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# Mallard Pass Solar Farm

# Local Impact Report

# A Report prepared by Rutland County Council

# June 2023

## Contents

## Introduction

1. This Local Impact Report has been prepared by Rutland County Council to identify the impacts that the proposed Mallard Pass Solar Farm will have on the land, countryside and communities within the County of Rutland.

2. The report is not a technical response to the submission made to the Planning Inspectorate in respect of the proposed development, it is an overview of the likely issues that will arise from the development and its construction in this location. This report is not intended to make any recommendation about the overall acceptability of the scheme but will identify areas where there appears to the Local Authority to be conflict with planning policy, and where impacts are considered to be temporary and short term in nature as opposed to those where the impacts will be long-term or permanent. The report will also confine itself to referencing matters relating to Rutland, as South Kesteven and Lincolnshire Planning Authorities will be producing their own reports.

## Description of proposed site and its current characteristics

3. The application site is a large parcel of land located within the northeast section of Rutland and the South Kesteven District of Lincolnshire. The site extends to approximately 825 Hectares and encompasses land in the vicinity of a number of smaller communities and villages within both Rutland and Lincolnshire. In particular, the proposed development is focused around the settlement of Essendine, and is in proximity to Ryhall, Belmesthorpe, Great Casterton, Little Casterton and Pickworth (Parishes beyond the boundary of Rutland are not referenced in this list – please refer to the LIRs produced by South Kesteven and Lincolnshire in this regard).

4. Essendine itself is a village of modest size with the 2011 census indicating a population of 448. It is also a village of limited facilities with the 2019 Sustainability of Settlements Assessment identifying its main community facilities being the village hall and a play area. The sole village pub closed a number of years ago and has since been demolished. The village is known for being near to the location (approx. 2km to the northwest of the village) where LNER locomotive 4468 “Mallard” set the land speed record for a steam locomotive, which stands to this day. Also of note are the remains of Essendine Castle (the moat and its mount) and its Chapel, which now stands as Essendine Parish Church (St Mary Magdalene) on the north-eastern side of the village. The area is popular with cyclists and has seen cycle races passing through the settlement between Carlby and Ryhall.

5. In the Local Authority’s opinion one of the main reason’s this site has been chosen for the proposed development is the fact that to the south of the village there is an existing substation providing power (import capacity) to the East Coast Mainline, consequently this offers a connection point to the National Grid for export capacity. In terms of power capacity, this offers a fairly unique

strategic opportunity in the UK for any investor looking to bring forward a significant renewable energy infrastructure project. The location of such projects is driven by the ability to connect to the grid. Most existing connections opportunities have limited capacity.

6. Further to the south is the village of Ryhall, a larger settlement than Essendine with a greater number of facilities albeit more removed from the immediate proximity of the proposed solar farm. This village and the smaller village of Belmesthorpe to its southeast form the hub of a number of longer-distance public rights of way providing access to the countryside.

7. Further to the south-west lies Great Casterton, which lies along proposed Route 1 from the A1 southbound to the site. Great Casterton is a settlement of greater service provision than Essendine and is central to a number of travel patterns in the area – this is due in particular to it being the site of a local primary school (5–11-year-olds), day nursery (under-fives) and secondary school (11–16-year-olds). As is common with such establishments there are also a number of adult education programmes and clubs/societies that use the facilities in the evenings. Both of these campuses (the primary school and the secondary school) are accessed directly from Ryhall Road, along which construction traffic is proposed to be routed from the A1.

**Proposed development**

8. The development proposed is described by the applicant as the "Construction of a Solar Farm that would allow for the generation and export of electricity exceeding 50 megawatts (MW) on approximately 825ha of land within Lincolnshire, South Kesteven and Rutland." The grid connection allows for export of up to 240MW of electricity from the development.

9. The proposal is for the solar farm to be constructed on a number of existing agricultural fields in the east of Rutland and in the adjoining district of South Kesteven, and for a new substation to be constructed to facilitate export of the electricity generated at the site to the National Grid through the existing connection point to the north of Ryhall.

10. Leading on from the description of the area the proposal has the following impacts that the Examining Authority will need to consider. They are not listed in any particular order of importance, and all should be considered to be of equal relevance to the proposal. The Local Impact Report guidance indicates this report should provide a statement of positive, neutral and negative local impacts but should not contain a balancing exercise, as that is for the Examining Authority to undertake. The points are considered on a topic basis rather than being grouped by the nature of the impact, as it is considered that there may be both positive and negative effects of the development within the same topic area.

## Relevant local policies

11. The development plan comprises a number of documents at the local level, including the Rutland Local Development Framework Core Strategy (2011) and the Rutland Local Plan Site Allocations and Policies Development Plan Document (2014). A number of neighbourhood plans have been and are being developed however none of these are located within the vicinity of the proposed development.

12. It is envisaged that the relevant policies from the development plan that apply to the development scheme will be addressed within the Statement of Common Ground to be produced between the applicant and the Local Authority. However it is considered relevant and necessary to consider the compliance of the proposal with the development plan policies at this stage and to identify where there is conflict and the nature of impacts that would arise from that conflict. The remainder of this report therefore uses the renewable energy specific policies as a framework for consideration of the matters relevant to the Local Impact Report.

## Development principles

13. Sustainable Development Principles.

14. Core Strategy Policy CS1 – Sustainable Development Principles

15. This policy is aimed at ensuring that development within the county adheres to a number of key principles regarding sustainable development. These can reasonably be summarised as regards the proposed development in terms of ensuring that measures are taken in respect of climate change and minimising development's impact on that topic, whilst enhancing the natural and man-made assets of the county (environment, culture and heritage). This policy also seeks to encourage the use of previously developed land where possible, and respects and enhances the character of towns, villages and the landscape.

16. Policy CS1 specifically requires that new developments in Rutland will:

- minimise the impact on climate change and include measures to take account of future changes in the climate;
- maintain and wherever possible enhance the county's environmental, cultural and heritage assets;
- be located where it minimises the need to travel and wherever possible where services and facilities can be accessed safely on foot, by bicycle or public transport;
- make use of previously developed land or conversion or redevelopment of vacant and under-used land and buildings within settlements before development of new green field land;
- respect and wherever possible enhance the character of the towns, villages and landscape;

- minimise the use of resources and meet high environmental standards in terms of design and construction with particular regard to energy and water efficiency, use of sustainable materials and minimisation of waste;
- avoid development of land at risk of flooding or where it would exacerbate the risk of flooding elsewhere;
- contribute towards creating a strong, stable and more diverse economy
- include provision, or contribute towards any services and infrastructure needed to support the development

17. Site Allocations Plan Policy SP1 – Presumption in favour of sustainable development.

18. Policy SP1 states that when considering new development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. It will always work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

19. The proposed development is for the construction of a renewable energy generation station, generating electricity from sunlight and feeding that generated capacity back into the National Grid via a connection to that network between the villages of Essendine and Ryhall.

20. The development carries a significant benefit in terms of its contribution towards national renewable energy targets, with in the region of 350 Megawatts of energy generated at the site which is comparable to the demand created by 92,000 homes. This contribution to renewable energy generation would be considered to be a positive impact in terms of national contribution and would also be in accordance with this policy. There would be an embedded carbon impact in respect of the manufacture of the panels and equipment associated with the development itself and the associated construction operations in order to develop the site. However, it is accepted that this will be outweighed by the renewable energy generated throughout the lifespan of the development.

21. Policy CS1 also requires that development proposals are measured in respect of their impacts on the character of towns, villages and the surrounding landscape and in this respect the proposal would result in significant change to that character.

22. Finally, policy CS1 seeks that development generally makes use of previously developed land in preference to greenfield sites. It is acknowledged that National Policy Statement for energy NPS EN-3 states that "*as most renewable energy resources can only be developed where the resource exists and where economically feasible, the IPC should not use a sequential approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).*"

23. Notwithstanding that point, the development proposed involves the construction of the solar farm on an extremely large parcel of land and would constitute one of the largest solar farm developed in the country at this stage. This would involve the loss of a substantial amount of land from contributing to agricultural production in the region. It is also acknowledged that the applicant's submission includes the consideration of a number of alternative sites that could have accommodated comparable generation capacity - these have been ruled out for a number of reasons including the land not being available for the development proposed, and the distance of the land from any connection point to the National Grid. The Examining Authority must come to their own conclusions regarding the rigour of the site selection process, however for the purposes of the Local Impact Report at this stage the loss of such a significant amount of agricultural land would be considered by the Local Authority to be a negative impact. The matter of agricultural land loss is addressed separately later in this report.

24. Core Strategy Policy CS2 – Spatial Strategy

25. Policy CS2 requires the consideration of the impact of development in terms of whether it is appropriate in both scale and design to reflect local character and to be consistent with maintaining and enhancing the local environment and contributing to local distinctiveness.

26. Whilst it is accepted that it is not helpful to include repetition of a particular point the scale of the project is seen as a key concern by the Local Planning Authority and the local communities in terms of its impact on the area and the character of the countryside and the settlements affected by the project. In this respect the project is considered to have a significant negative effect on the village of Essendine, in particular, and its surrounding countryside.

27. The extensive nature of the application site is such that it would not be possible to travel into or out of the village without experiencing the proposed solar farm and its effects on the character of the village and its countryside setting. As noted earlier, a key aspect of the character of the village is its easy access to the countryside and its relationship with that resource given the lack of other community facilities generally available to residents. This impact is considered to be negative and significant.

28. Policy CS2 does include reference to the promotion of renewable energy however this is specifically with reference to policy CS20 which requires consideration of the specific impacts of the proposed developments, with support for schemes being conditional upon the balancing exercise of benefits versus harm that is the responsibility of the Examining Authority in this instance.

29. Location of Development

30. Core Strategy Policy CS4 – location of development

31. This is a general locational policy seeking to ensure that development where possible is located within existing settlement boundaries and restricting development beyond those locations to only those types of proposal that require such a countryside location. The nature and scale of the proposed project is one that could not be accommodated within the limits of development of any of the existing settlements within the County, and as such it is considered that the principle of locating the development within the countryside would be a neutral impact in respect of this planning policy.

32. Site Allocations Plan Policy SP7 – Non-residential development in the countryside

33. Similarly to policy CS4 of the Core Strategy policy, SP7 seeks to restrict development in the countryside to a number of development types that are able to justify requiring a countryside location. The scale of the project precludes its incorporation within the development limits of any of the villages. SP7 point 'b' states that sustainable development in the countryside will be supported where it is essential for the provision of sport, recreation and visitor facilities for which the countryside is the only appropriate location.

34. It goes on to state however that such support will only be given provided that:

i) the development cannot reasonably be accommodated within the Planned Limits of Development of towns and villages;

ii) the amount of new build or alteration is kept to a minimum and the local planning authority is satisfied that existing buildings are not available or suitable for the purpose;

iii) the development itself, or cumulatively with other development, would not adversely affect any nature conservation sites or be detrimental to the character and appearance of the landscape, visual amenity and the setting of towns and villages;

iv) the development would not adversely affect the character of, or reduce the intervening open land between settlements so that their individual identity or distinctiveness is undermined; and

v) the development would be in an accessible location and not generate an unacceptable increase in the amount of traffic movements including car travel.

35. In considering the development in relation to points iii and iv above, the Local Planning Authority considers that the scale of the proposal and its location, in particular in relation to the village of Essendine, is such that it will have a detrimental effect on the character and appearance of the landscape and the setting of villages. As noted, in particular with reference to Essendine it is considered that the extensive spread of the proposal will result in this village feeling like it is located within the solar farm, rather than the solar farm being located near to the village. This impact is considered to be negative in relation to the visual appearance and character of the area and the setting of the village.

36. Core Strategy Policy CS6 – Re-use of redundant military bases and prisons.

37. Policy CS6 acknowledges that there are a number of sites within the County that fall within this description and notes that alternative uses may need to be found in order to prevent them becoming derelict. The application considers these as potential alternative locations for development, however it concludes that for reasons relating to scale and connection distance none of them provide a comparable situation to the application site. The impact of the proposal in relation to this policy is therefore considered to be neutral.

**Local Planning Policies – renewable energy specific policies and considerations.**

38. Core Strategy Policy CS20 – Energy Efficiency and low carbon energy generation

39. Policy CS20 states amongst other things that wind turbines and other low carbon energy generating developments will be supported where environmental, economic and social impacts can be addressed satisfactorily and where they address the following issues:

a) landscape and visual impact, informed by the Rutland Landscape Character Assessment and the Rutland Historic Landscape Character assessment;
b) effects on the natural and cultural environment including any potential impacts on the internationally designated nature conservation area of Rutland Water;
c) effects on the built environment, public and residential amenity, including noise intrusion; d) the number and size of wind turbines and their cumulative impact;
d) the contribution to national and international environmental objectives on climate change and national renewable energy targets.

40. Site Allocations Plan Policy SP18 – Wind turbines and low carbon energy developments

41. Policy SP18 states that proposals for wind turbines and other low carbon energy developments will be supported where environmental, economic and social impacts can be addressed satisfactorily in accordance with Core Strategy Policy CS20 (Energy efficiency and low carbon energy developments).

42. With regard to proposals for other low carbon energy developments policy SP18 indicates that developments will be supported where they are acceptable in terms of:
a) impact on residential amenity;
b) landscape and visual effects;
c) the natural environment;
d) the historic and cultural environment;
e) noise;
f) emissions to ground, watercourses and air;
g) odour;
h) vehicular access and traffic;
i) proximity of generating plants to the renewable energy source;
j) grid connection;
k) form and siting;

l) mitigation;
m) the decommissioning of the development and reinstatement of land at the end of its operational life.

43. Policies CS20 and SP18 deal more specifically with proposals for renewable energy developments, and as such the remainder of the LIR will consider the detailed impacts of the proposal in light of the requirements set out in those policies.

**Residential Amenity**

44. Policy CS19 states that all new development will be expected to contribute positively to local distinctiveness and sense of place; be appropriate and sympathetic to its setting in terms of scale, height, density, layout, appearance, materials, and its relationship to adjoining buildings and landscape features; and shall not cause unacceptable effects by reason of visual intrusion, overlooking, shading, noise, light pollution or other adverse impact on local character and amenities.

45. Policy SP15 states under sub paragraph c) that development should protect the amenity of the wider environment, neighbouring uses and occupiers of the proposed development in terms of overlooking, loss of privacy, loss of light, pollution (including contaminated land, light pollution or emissions), odour, noise and other forms of disturbance.

46. It is acknowledged that due to the scale of the proposed development this solar farm will make a contribution of national significance in respect of power generation. It is also the case however that this proposal is not proposed to be constructed in a remote, isolated location. Whilst it is in the countryside, it is located in close proximity to a number of residential villages in the eastern part of Rutland. It is therefore incumbent on any balancing exercise undertaken by the Examining Authority to consider the impacts on the amenity of those residents and whether or not the development would result in harmful impacts.

47. The impacts on residential amenity can also be separated into two distinct categories; the permanent effects from the development once completed, and the ‘temporary’ effects from the construction phase, including construction noise, disruption and the impact of the required vehicular movements to and from the site to deliver components and construction materials, as well as construction staff to undertake the work.

48. With regard to the first of these impacts, given the likely operating parameters of the development proposed, the main impact on residential amenity will be related to views of the proposed solar panels from residential dwellings. It is noted from the layout plans submitted as part of the application that in proposing the precise location of panels in relation to residential dwellings, buffer zones have been incorporated into the scheme to ensure that panels are not located immediately adjacent to residential dwellings. In this regard therefore, the Local Planning Authority considers the impact on residential amenity to be negative as it will take a significant amount of time before any of the landscaping will

become mature enough to provide any meaningful screening. It will however be essential to ensure that any proposed landscaping/screening is secured by condition and maintained throughout the life of the development.

49. Noise and disruption

50. The second of the residential amenity issues will be felt considerably beyond the area of influence of the project itself once completed, and this relates to the impact of the construction phase of the proposal. The proposed delivery route for the construction phase passes through Great Casterton and Ryhall and will require further distribution of construction materials and equipment from the main compound to other parts of the site north of the railway line. This will require those vehicles to then pass through parts of the village of Essendine. The provision of average traffic figures within the documentation also does not present a complete picture of the likely impact given there will be periods for deliveries etc where those traffic movements will be intensified across a much smaller time period. This will result in much greater impact on the amenity of the properties along the proposed access route than is portrayed by the average movement figures provided. The Local Planning Authority therefore concludes that the construction phase activities will result in a negative impact on residential amenity in the area of the application site and along the proposed access routes.

**Landscape and Visual Impacts**

51. Site Allocations Plan Policy SP23 – Landscape Character in the Countryside

52. Policy SP23 states that proposals to develop on land in the countryside will only be permitted where the development complies with either Policy SP6 (Housing in the countryside) or Policy SP7 (Non-residential development in the countryside) and Policy SP15 (Design and amenity) and Policy SP19 (Biodiversity and geodiversity conservation).

53. New development in and adjoining the countryside will only be acceptable where it is designed so as to be sensitive to its landscape setting. Development will be expected to enhance the distinctive qualities of the landscape character types in which it would be situated, including the distinctive elements, features, and other spatial characteristics as identified in the Council's current Rutland Landscape Character Assessment.

54. Proposals will be expected to respond to the recommended landscape objectives for the character area within which it is situated.

55. The application site falls within the D(ii) – Clay Woodlands area of Rutland as detailed in the 2003 Landscape Character Assessment, and this area is described within that assessment as "gently undulating, predominantly arable countryside" with its key characteristic being large scale mixed broadleaved and coniferous woodlands (generally located in the north and west of this sub-area away from the application site). Woodlands of this type are generally less common and of a smaller size within the vicinity of the application site and the

Gwash Valley, where the assessment acknowledges there is a more open feel to the landscape and the railway line and its associated infrastructure are more visible. The assessment identifies that the key landscape objective for this area is to *"conserve and enhance the large-scale, gently undulating, agricultural landscapes with substantial woodlands and avenues, to enhance the sustainable management of existing woodlands and to create new woodlands in the less wooded parts around the Gwash Valley, especially where they would create skyline features. To improve the edges of the settlements and integrate large structures and modern buildings into the landscape where necessary. To protect historic features such as earthworks and restore characteristic drystone walls."*

56. The proposed development itself is a large-scale project - as noted earlier it would be one of the largest solar farm within the UK at the current time. The scale of the project is of significant concern to the Local Planning Authority and is a contributary factor in a number of the identified negative impacts within this report. With particular reference to landscape impact however the scale of the proposal is a matter that ensures that the impacts of the scheme will be felt across a significant part of the County. Although it is unlikely that the entirety of the proposed development will be visible from any single point at one time, the extensive nature of the site will magnify the significance of the negative landscape impacts due to the area over which they will be experienced.

57. The key landscape objective for the area within which the site is located notes the importance of improving the edges of settlements and integrating large structures and modern buildings into the landscape. The proposal under consideration has been amended so as to try and reduce its impact on the surrounding settlements, however its location and spread are such that even with these elements of the scheme removed, there remains a significant impact on the landscape from the proposed panel fields when travelling in and through the area, in terms of impact on Public Rights of Way users, road users, cyclists, residents and passengers on the railway line. These impacts are also addressed elsewhere in the report in relation to a number of other issues, however they are also relevant to consideration of the impact of the development on the landscape.

58. Whilst local plan policies generally provide support for renewable energy projects this is caveated subject to a review of their impacts on the proposed location. It is the Local Planning Authority's opinion that given the particular characteristics and quality of the countryside in this location and the nature of the landscape impacts arising from the overall significant scale of the development proposals, it is considered that the development would have a significantly negative impact on the landscape character of the area. It is also notable that in respect of the stated landscape objective of creating new woodlands in the less wooded parts of the landscape character area, the proposal only includes two areas of proposed new woodland. This is despite a considerable amount of land being set aside around the panel locations for wildflower and tussock grassland.

59. Overall therefore the proposal is considered to have a negative impact on the landscape of the surrounding area.

**Natural Environment**

60. Core Strategy Policy CS21 – The Natural Environment

61. Core Strategy CS21 requires that developments should be appropriate to the landscape character type within which it is situated and contribute to its conservation, enhancement or restoration, or the creation of appropriate new features.

62. The quality and diversity of the natural environment of Rutland will be conserved and enhanced. Conditions for biodiversity will be maintained and improved and important geodiversity assets will be protected.

63. Protected sites and species will be afforded the highest level of protection with priority also given to local aims and targets for the natural environment. All developments, projects and activities will be expected to:

a) Provide an appropriate level of protection to legally protected sites and species;
b) Maintain and where appropriate enhance conditions for priority habitats and species identified in the Leicestershire, Leicester and Rutland Biodiversity Action Plan;
c) Maintain and where appropriate enhance recognised geodiversity assets
d) Maintain and where appropriate enhance other sites, features, species or networks of ecological interest and provide for appropriate management of these;
e) Maximise opportunities for the restoration, enhancement and connection of ecological or geological assets, particularly in line with the Leicestershire, Leicester and Rutland Biodiversity Action Plan;
f) Mitigate against any necessary impacts through appropriate habitat creation, restoration or enhancement on site or elsewhere;
g) Respect and where appropriate enhance the character of the landscape identified in the Rutland Landscape Character assessment;
h) Maintain and where appropriate enhance green infrastructure.

64. Site Allocations Plan Policy SP19 – Biodiversity & Geodiversity Conservation

65. Policy SP19 states that development proposals will normally be acceptable where the primary objective is to conserve or enhance biodiversity or geodiversity. All new developments will be expected to maintain, protect and enhance biodiversity and geodiversity conservation interests in accordance with Core Strategy CS21 (The natural environment).

66. The Local Planning Authority considers there are four general areas within this topic that will result in impacts on the natural environment as a result of the proposals. These are:
67. The loss of a large amount of agricultural land from its current availability for food production
68. The impacts on biodiversity within and surrounding the site.

69. The impacts of ecological mitigation proposals for the development
70. The impact of the scheme on surface water in the vicinity of the application site and consequential potential for flooding.

71. Loss of agricultural land

72. The application seeks the permanent permission for the construction of a solar farm on the land, and therefore the impact considered in respect of the loss of agricultural land is not to be made on the basis that the land would be returned into agricultural production at a later date, but instead represents the permanent loss of that land from active production. This impact would be considered to be negative in nature, and the Examining Authority will be required not only to balance the impact of that loss in isolation, but also the cumulative impact with other proposed schemes involving large amounts of agricultural land loss in the wider region.

73. The documents accompanying the statement in this regard focus on the difference between the loss of additional production from the land due to its agricultural land quality over and above that which would be produced if the land were of lower quality not falling within the Best and Most Versatile grades. The statement does not appear to assess the overall impact of the loss of agricultural production from the site as a whole. This is a particular concern and needs to be fully assessed especially in relation to the matter of food security. Due to this and given the overall scale of the project, the Local Planning Authority considers that the loss of this quantity of agricultural land represents a negative impact.

74. Impact on biodiversity

75. The scale of the application site is such that it encompasses a wide range of habitats and biodiversity features, including nine Local Wildlife Sites and one Site of Special Scientific Interest within its scope. These sites are all excluded from the specific main development areas of the proposal, although some ancillary works such as cable routes and highway works could affect them. The extent to which these features are affected by those works and the weight to be attributed to those impacts will be a matter for the Examining Authority to balance, however any such impacts would be classified as negative.

76. The application site is located approximately 10km from Rutland Water, a designated RAMSAR site, Special Protection Area and a Nature Conservation review site. The reservoir is also a wetland site of International importance. The significance of Rutland Water in this regard is related to its suitability for wildfowl and associated species, and the application site is not therefore considered to be functionally linked to Rutland Water as it is not suitable for such species.

77. The fields are generally currently in use for agricultural purposes however the proposals have the potential to impact adversely upon ground nesting bird species and also brown hares. Currently available evidence would indicate that land uses of this nature will adversely impact skylarks in particular, which are the predominant species at this site. It is therefore concluded that in line with

advice provided by its advisors on ecological matters, the Local Planning Authority considers that there will be a negative impact on skylarks as a result of the proposal and the Examining Authority will need to be satisfied that any mitigation proposals satisfactorily address this point.

78. Surface Water and Flooding

79. The Lead Local Flood Authority has made an assessment of the proposals and the information submitted alongside it in relation to the impact of the scheme on surface water drainage and flows around the application site. The full text of their response is included as Appendix 1 to this report.

80. The LLFA considers that the application does not adequately address the matter of soil compaction, or the insertion of a concrete base or piling required to secure the installation of the panels and the combined impact this would have on the surface water drainage within the site. It is therefore considered that the proposals would have a negative impact on surface water drainage across the vicinity of the application site, and that the development could pose a flooding risk.

81. Furthermore, the information submitted alongside the application does not make provision for flood prevention measures throughout the construction period when works to implement any consent would also affect surface water drainage in ways that differ from those predicted once the development is complete. This can include the stripping back of land resulting in less infiltration taking place and has been experienced on other sites within the County in recent weeks. This would also constitute a negative impact.

82. Finally, the proposed development will result in the breaking of the existing land drains across the site, which if not reinstated as part of the project would result in potential for flood risk.

**Historic and Cultural Environment**

83. <u>Core Strategy Policy CS22 – The historic and cultural environment</u>
84. CS22 requires the quality and character of the built and historic environment of Rutland to be conserved and enhanced. Particular protection is to be given to the character and special features of:

a) listed buildings and features;
b) conservation areas;
c) scheduled ancient monuments;
d) historic parks and gardens;
e) known and potential archaeological sites.

85. All developments, projects and activities are expected to protect and where possible enhance historic assets and their settings, and maintain local distinctiveness and the character of identified features. Development should respect the historic landscape character and contribute to its conservation, enhancement or restoration, or the creation of appropriate new features.

86. Site Allocations Plan Policy SP20 – The Historic Environment

87. SP20 states that all developments, projects and activities will be expected to protect and where possible enhance historic assets and their settings, maintain local distinctiveness and the character of identified features in accordance with Core Strategy Policy CS22 (The historic and cultural environment).

88. Development proposals affecting or likely to affect any heritage asset or its setting will be expected to demonstrate an understanding of the significance of the asset and/or its setting by describing it in sufficient detail to determine its historic, archaeological or architectural interest to a level proportionate with its importance. As a minimum this should be through reference to the Historic Environment Record or by a desk-top analysis and reference to other relevant sources of information, which may include landscape character and historic landscape character appraisals, conservation area appraisals and management plans.

89. Measures may be taken to protect and enhance heritage assets at risk through neglect, decay or other threats including the serving of urgent works notices, repairs notices and enforcement and thorough the mitigation of impacts of development on site or off site.

90. Where a development has the potential to affect heritage assets with archaeological interest, Policy SP20 requires (amongst other things) the applicant to submit an appropriate desk-based assessment and where necessary a field evaluation.

91. Development proposals that would result in the removal or destruction of remains of archaeological interest that are considered to be of equal significance to a scheduled monument will not normally be permitted.

92. Proposals for development on areas that are of known or suspected archaeological interest must be accompanied by an archaeological field evaluation that determines the significance of the archaeological remains and assesses the implications of the development on those remains. Development that would have an adverse effect on a site of national archaeological importance, including scheduled ancient monuments, their setting and amenity value will only be acceptable in exceptional circumstances and where it would meet the requirements for designated heritage assets. Scheduled monuments designated as at the time of the preparation of this plan are shown on the Policies Map.

93. Development that would adversely affect other important archaeological remains will only be acceptable where:

a) the benefits of the development outweigh the harm to the remains and the value of retaining the remains in situ and;
b) the degree of disturbance has been minimised; and
c) satisfactory provision is made for the evaluation, excavation, recording and interpretation of the remains before the commencement of development.

94. Listed buildings and Scheduled Ancient Monuments

95. The only listed building within the vicinity of the application site is the St Mary Magdalene Church, located on the eastern edge of the village of Essendine. To the rear of this site lie the remains of Essendine Castle, designated as a scheduled ancient monument. These features are screened to their eastern elevation by an existing row of mature trees, which although deciduous and therefore offering a variable level of screening from the development site depending on the time of year, do provide some visual separation between the proposals and the designated heritage assets. With regard to the impact on the setting of these assets therefore the impact is considered neutral.

96. Conservation Areas.

97. The only Conservation Area within the vicinity of the application site is that located in Ryhall. Due to the nature of the boundary of the Conservation Area and the relationship between it and the site, there is not considered to be any impact from the proposed development on it.

98. Historic Parks and Gardens

99. There are none in the vicinity of the site, and therefore the impact is considered to be neutral.

100. Archaeology

101. The submission has been assessed by the Local Planning Authority's Archaeological advisors with a view to assessing the work undertaken to this point and whether or not this is sufficient to allow the full impacts of the proposal on archaeological assets to be understood. The full text of this response is included at Appendix 3.

102. In summary, the advice provided is that the assessment undertaken by the developer is inadequate and incomplete and does not provide enough information to fully understand the impacts of the proposed development, which results in an inability to adequately inform mitigation proposals. The impact is therefore considered to be negative.

103. The evaluation tools used so far are insufficient to inform a detailed mitigation plan. The principal construction compound has not been evaluated and the lack of trial trenching means it is unclear whether the proposed approach is achievable. Even utilising a 'no-dig' method could result in damage to archaeological features. The investigative work undertaken is also insufficient to identify the location or extent of key features.

104. The trial trenching undertaken at this stage fails to meet with the recommended 2-5% (depending on geophysical survey coverage) sample size of the area, with a number of locations not surveyed at all. The reporting of the fieldwork is also noted as being inadequate, with only a partial account of the work provided and a number of trenches indicated as still being under investigation. The report is noted as falling below professional standards for the reporting of archaeological investigations.

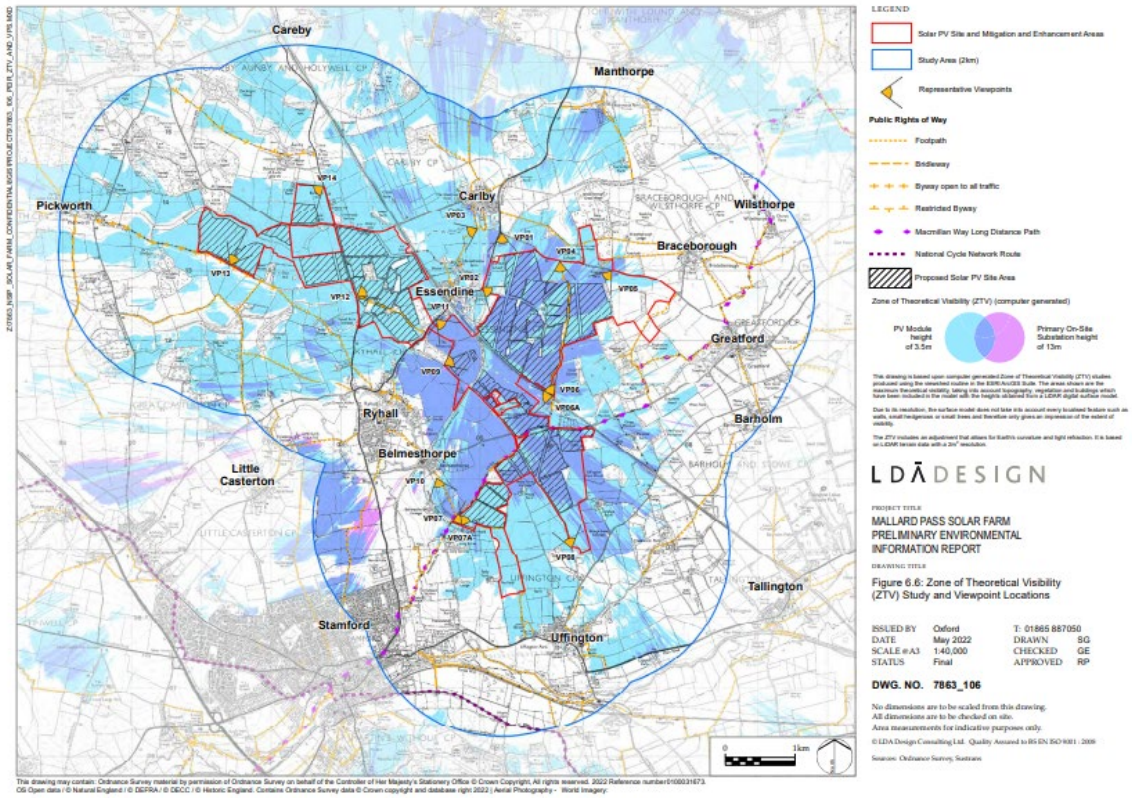
105. In conclusion the report fails to meet with the requirements of relevant policies both local and national, and the impact of the proposal in this matter is considered to be negative.

106. Core Strategy Policy CS23 – Green infrastructure, open space, sport and recreation

107. Policy CS23 relates to the provision and use of green infrastructure within the County It seeks to safeguard the existing green infrastructure network and improve and enhance that provision. The proposal will impact on the existing infrastructure and it is proposed to introduce a number of permissive paths. Due to the proximity to the proposals and the overall scale of the development it is considered that the development will have a negative impact on the very reason why users would seek to use the green infrastructure, namely for experiencing the countryside and the enjoyment of the quality of the landscape in this location.

108. Policy CS23 specifically seeks the continued development of a network of green spaces, paths and cycleways in and around the towns and villages. The policy also seeks to resist development that would result in the loss of green infrastructure or harm to its use or enjoyment by the public.

109. The image below shows the extent of the zone of theoretical visibility for the development around the villages of Pickworth, Careby, Manthorpe, Carlby, Essendine, Ryhall, Belmsthorpe and Uffington, with lesser visual impacts likely in Braceborough, Wilsthorpe, Greatford, Barholm, Stamford and Little Casterton. This is an image included in the developer's planning submission.




110. Whilst all of the solar farm will not be visible from a single point the extent of areas potentially impacted on the ZTV shows that it will not be possible to travel around the area without encountering frequent and potentially extensive views of the development. Anyone heading to or from Essendine, or out for a stroll, will inevitably see the solar farm on their journey, potentially from multiple locations and for a distance up to 2.5 miles.

111. The scale of the development is such that local residents are concerned about the impact on their amenity and potentially on property prices in the area. Whilst impact on property prices is not a material planning consideration it is a real life impact that will be bourn by local residents as a consequence of the scale and nature of the development. By the Developer's own assessment the development will have a Major – Moderate adverse impact which will be significant.

112. It is considered that the impact of the proposed development would be to discourage the use of the Public Rights of Way network in the vicinity of the application site and diminish the enjoyment of the existing green infrastructure network. The Local Planning Authority therefore considered that the impact of the development proposals in this regard is to be categorised as negative.

113. Whilst the Local Planning Authority acknowledges that additional proposed permissive paths are to be provided as part of the scheme their proposed location in amongst and adjacent to the panel installations is such that it is considered unlikely that these additional paths would be well used for the same reasons it is expected that usage of the existing paths will reduce. As

permissive paths the Local Planning Authority also recognises these can be withdrawn at any time by the land owner. Whilst they would provide an area to walk the enjoyment of those walks would be significantly reduced due to the impact on the visual amenity of the area whether by views of the solar panels themselves or by the screening of wider landscape enjoyment due to the need for additional screening along the routes.

114. Core Strategy Policy CS15 – Tourism

115. Policy CS15 considers the impact of proposals on tourism within the County, providing support for new initiatives and enhancement of existing facilities. It is important to recognise that a considerable factor in the appeal of the County to visitors is the aesthetic quality of its countryside and the ease of access to that resource. Essendine itself contains businesses that support the tourism industry within the area, such as a local vineyard, and key aspects of its appeal are the location in respect of the Mallard's speed record and the quality of the countryside and views over it encouraging tours of the vineyards themselves. It is therefore concluded that the proposal would have a negative impact in respect of the tourism industry both in relation to the specific businesses making use of that resource and the more general aspect of experiencing the local countryside for its own sake. That negative impact would also therefore have a resultant negative impact on the contribution made to that industry by the local area.

116. The scheme does propose a number (4) of new permissive paths to be provided through the countryside as part of the development scheme, however the appeal of such paths is likely to be significantly diminished by their location in and amongst the proposed solar farm itself. Therefore, it is not considered to be a direct comparable replacement of the existing footpaths through the countryside within the area. It is therefore the Local Planning Authority's opinion that the overall impact of the provision of paths across the site will be a negative one and at best neutral. It is considered that the 4 additional permissive paths cannot be considered as a significant positive benefit of the scheme when weighed against the wider impacts.

117. The proposal includes provision for new landscaping to be provided across the site. Of particular relevance to the tourism impact of the scheme is the indication that existing and proposed footpaths will generally be flanked by landscaping (either hedgerow or tree belt) to mitigate the impact of views of the panels and ancillary structures from those features. Whilst such planting may have the desired effect in terms of screening the panels themselves, the resulting associated impact is that in many cases users of the footpaths will then feel like they are walking a corridor in the countryside, with little to benefit in terms of views or appreciation of the wider area as a result. Consequently, even considering the proposed screening of footpaths around the site, the Local Planning Authority considers the impact of the scheme on the likely use of those footpaths to be negative.

118. There is also a significant downplaying of the impacts of construction on recreational activities. For example, the PEIR identifies that the local road

network has limited walking and cycling infrastructure. It also reports that whilst there may be some associated recreational used by pedestrians and cyclists, it is likely that this would be on an ad-hoc basis and outside of the typical proposed construction site working hours. Elsewhere the documentation goes on to note that construction hours are proposed to be 0700 – 1900 six days per week with workers arriving and leaving between 0600-0700 and 1900-2000 hrs. Between the arrival of deliveries and the length of the working day there is little opportunity for recreational walking and cycling not to be impacted during the 2+-year construction period. Furthermore the extended working week will potentially result in tired drivers entering and leaving the site, with the additional risk of accidents this will bring.

The extended working days are also likely to make horse riding in the area during the construction period very problematic.

Walking, cycling and horse riding are all activities in the area with significant participation and impact users from a much wider area than just the immediate environs of the villages at the centre of this development.

**Noise**

119. Impacts in respect of noise are expected to be classed within one of three categories.
- Construction noise
- Operational noise of the panels and immediately adjoining equipment
- Operational noise associated with the substation and transmission network.

120. The panels themselves do not emit noise as a result of their normal operation and therefore this is considered to be a neutral impact.

121. The substation and transmission network is likely to emit some noise, generally a low-level hum or buzz. The supporting ES indicates that this will rarely be audible except in immediate proximity of the equipment itself. The Council has some concerns in relation to this point and would want the examining authority to be satisfied that this statement is correct in order to ensure that there was no adverse impact from this element of the proposed development.

122. The matter of construction noise is a rather more complex matter than other noise impacts associated with the development. Impacts in this regard are going to be negative in nature but will by definition be temporary. This must be balanced however against the likely construction period of a project on this scale, which in this case will be measured in terms of a number of years rather than days or months. On that basis, it is considered that there will be a negative impact arising from the development in terms of construction noise, and the Examining Authority will need to consider if and by what means this impact is controlled through the development process.

123. Rutland County Council would in particular question the appropriateness of the proposed constructions times. Paragraph 5.13.8 of the ES [APP-035] sets out the core construction hours which would run from 07:00 to 19:00 Monday to

Saturday, and no working on Sundays or Bank Holidays. The Local Planning Authority would suggest that given the scale of the project and to provide local residence with some respite from the construction noise that there should be no working on Saturdays as well as Sundays.

**Emissions to ground, watercourses and air**

124. Solar Farms are generally considered to be a zero-emission energy generating solution (once any embedded carbon relating to their manufacture and transportation is factored in) and consequently it is not considered that there is any impact associated within emissions to ground, watercourse or air from the proposal. As such, the impact in relation to this point is neutral.

**Odour**

125. Similarly to the issue of noise arising from the development and other emissions, solar farm developments are not generally associated with odour emission during operation, however the construction phase is like to be an intensive part of any development process and there is the potential for this to result in negative impacts on the surroundings of the site.

126. As detailed earlier, it will be a matter for the Examining Authority to consider what controls to impose on the construction phase to ensure that these matters are kept within acceptable tolerances. Subject to the satisfactory resolution of this point, the odour impact of the proposal is considered to have a neutral impact.

**Vehicular Access and Traffic**

127. <u>Core Strategy Policy CS18 – Sustainable transport and accessibility</u>

128. Policy CS 18 states that the Council will work with partners to improve accessibility and develop the transport network within and beyond Rutland and accommodate the impacts of new development by focusing on:

a) supporting new development in the towns and local service centres in line with the locational strategy in Policy CS4 which are accessible by a range of sustainable forms of transport and minimise the distance people need to travel to shops, services and employment opportunities;
b) supporting development proposals that include a range of appropriate mitigating transport measures aimed improved transport choice and encourage travel to work and school safely by public transport, cycling and walking, including travel plans;
c) providing safe and well-designed transport infrastructure;
d) improving bus routes, services and passenger facilities around the key transport hubs of Oakham and Uppingham and linkages to the larger service villages and nearby cities and towns, such as Leicester, Peterborough, Corby and Stamford;
e) improving passenger rail services and facilities to Oakham and other parts of the region and bus, pedestrian and cycle links to the rail station;

f) supporting opportunities for sustainable freight movement by rail where possible;
g) Integration between the different modes particularly bus and rail services through provision of a sustainable transport interchange in Oakham;
h) providing adequate levels of car parking in line with Council's published car parking standards;
i) co-ordination and joint working between the education, public, business, voluntary and community sectors to achieve affordable and sustainable transport, wherever possible; and
j) the delivery of highways and transport improvements as guided by the Local Transport Plan through joint working with neighbouring authorities and transport providers, where necessary.

129. Full comments of The Local Highways Authority are attached as Appendix 2, with the following being a summary of those points.

130. The Local Highways Authority has indicated that the operational phase of the development will result in a negligible impact in respect of traffic generation, both in terms of the number of trips generated and the size of vehicles involved. It also considers that the decommissioning phase requirements and impacts should be addressed at a later stage closer to the time of decommissioning itself due to the potential for changes to the highway environment over the operational lifetime of the development.

131. The primary impact of this development therefore will be during construction and the following points are considered relevant to the balancing exercise to be undertaken by the Examining Authority.

132. Construction Route
133. The proposed routing strategy will lessen the impact of construction vehicles on roads in the area when compared to the use of a single route, however there will still be impacts arising in this regard.
134. Junction improvement work will be necessary to facilitate access during the construction phase and mitigate the impact of the increased loads on the access route. The Local Highways Authority indicates however that the improvement works can be undertaken safely through the use of temporary signals that will result in some delays to road users over the periods when those works are being undertaken.

135. Concern is highlighted by the Local Highways Authority over the number and type of vehicles using the Ryhall Road, Great Casterton route during school start and finish times. It is noted that the Outline Construction Traffic Management Plan (oCTMP) restricts the use of this road during those times and this is considered to be an essential requirement of the oCTMP without which there would be a significant negative impact on the safety of school children travelling to and from the school sites along that road. It is noted that Ryhall Road is a route designated for abnormal loads and does not carry a weight restriction and therefore it is not considered that it would be appropriate to prohibit the use of this road completely for access to the site. The impact is

therefore assessed as neutral provided the oCTMP is enshrined within any decision made in respect of the scheme.

136. Traffic Generation

137. As noted previously the operational phase of the development is considered to have no discernible impact in respect of trip generation. The Local Highways Authority has undertaken pre-application discussions with the developer in respect of the construction phase agreeing assessment methodologies and details to inform the application submission. The oCTMP restricts delivery vehicles to and from the primary site outside peak hours, and the Local Highways Authority are satisfied that subject to those restrictions and the implementation of the Travel Plan and Transport Assessment in respect of the construction, the impact on the highway would be neutral.

138. Accesses to the site

139. In general, the Local Highway Authority considers the impacts relating to the access proposals into specific fields to be low, with one exception, which is the junction of The Drift with the B1176. The LHA considers that in its current form this access would result in a high negative impact due to concerns relating to highway safety. It is therefore recommended that the Examining Authority consider requiring this access to be relocated to a more acceptable point and form.

140. Parking and Turning

141. Similarly to the previously considered impacts in respect of the highways issues surrounding the proposal, the Local Highways Authority indicates that subject to a number of details not currently provided being incorporated as a pre-commencement requirement into any Development Consent Order for the site, the matter of parking and turning for vehicles associated with the project will not result in negative impacts.

142. Verge damage

143. The Local Highways Authority indicates that unless pre-commencement and post-completion surveys of the local highways are secured alongside remedial work to be undertaken by the developer as part of any DCO, the impact of HGVs associated with the development damaging these features could be negative and significant. The Examining Authority must therefore satisfy itself that if a DCO is granted it satisfactorily addresses this point in a manner that ensures no long-term negative effect. This is equally important in any decommissioning scheme to be provided.

144. Detritus on the highway

145. The Local Highways Authority considers that the proposed wheel wash systems are not satisfactory, and have the potential to result in a significant negative impact through the deposition of mud and detritus on the highway. It proposes

therefore that the proposals should be required to be amended and full details specified to ensure that the risk is removed/lessened to a point where the impact will be low.

146. In summary, there are varying degrees of impact depending on what element is being considered, but overall, should the recommended Requirements, as shown above, be secured on the DCO, the impact is generally low to moderate. Whilst the junction improvement works may give a moderate to high impact, this is based on journey delay times, however this will be for a relatively short time period, not the whole two-year construction period. Where impacts are shown as negligible, low or moderate, but based on recommended Requirements on the DCO, should these not be secured the impact would increase, in some cases to high.

147. In addition to the above points raised by the Local Highway Authority Members of the Planning Committee also raised questions about what would happen if construction traffic was delayed due to an accident on the A1 and where would vehicles wait if they could not assess the site due to the timing restrictions avoiding the peak times on the access routes. RCC would therefore seek conformation of how this would be managed and where HGV's in particular could wait if they were to potentially arrive into the county at times when they could not use the access routes due to the time restrictions placed on any DCO.

**Proximity of generating plant to renewable energy source**

148. This is not considered relevant to the matter of solar power as the panels cannot be located in close proximity to the energy source. The impact is therefore considered to be neutral.

**Grid connection**

149. The proposed grid connection is the matter that the Local Planning Authority considers is the main reason for the choice of site, as the connection to the National Grid is already in existence and is in close proximity to the application site.

150. The full detail of this matter remains unresolved however despite the relatively advanced stage of the application process as the submission still presents three potential options for the transmission of power from the northern part of the site over the railway line to the substation in the south, where the generated electricity will be stepped up for transmission into the wider network and connected to the existing Ryhall 400kV substation under Uffington Lane. The lack of clarity at this stage of the process in this regard is concerning to the Local Planning Authority.

151. The proximity of the grid connection point to the site is considered to be a positive aspect of the proposal but until clarity is provided regarding the method by which the electricity generated to the north of the railway line is transmitted to the new substation and the grid connection point the Local Planning Authority must conclude that the overall impact of this is negative.

**Form and siting**

152. Core Strategy Policy CS19 – Promoting Good Design

153. Policy CS19 states all new development will be expected to contribute positively to local distinctiveness and sense of place, being appropriate and sympathetic to its setting in terms of scale, height, density, layout, appearance, materials, and its relationship to adjoining buildings and landscape features, and shall not cause unacceptable effects by reason of visual intrusion, overlooking, shading, noise, light pollution or other adverse impact on local character and amenities.

154. All new developments will be expected to meet high standards of design that:

a) are sympathetic and make a positive contribution towards the unique character of Rutland's towns, villages and countryside;

b) reduce the opportunity for crime and the fear of crime and support inclusive communities, particularly in terms of access and functionality;

c) incorporate features to minimise energy consumption and maximise generation of renewable energy as part of the development (see Policy CS20);

d) minimise water use and the risk of flooding to and from the development including the use of Sustainable Urban Drainage Systems wherever possible;

e) minimise the production of waste during their construction and operation and maximise the re-use and recycling of materials arising from construction and demolition and;

f) allow the sorting, recycling and biological processing of waste through the development's operational life.

155. Whilst it is accepted that the specific design of the solar panel arrays proposed are not a matter likely to be a design variable, this policy also considers the matter of design in a wider context with regard to impact on character of the development setting and the setting of villages as well as more detailed design choices. In that respect, the Local Planning Authority considers that the development would not make a positive contribution to the character of its surroundings and the countryside in general and would therefore have a negative impact in respect of this policy.

156. Site Allocations Plan Policy SP15 – Design and amenity

157. This policy states that all new developments are expected to meet the requirements for good design from Core Strategy policy CS19. Whilst not necessarily intended to influence design considerations in respect of large-scale solar farm development, a number of key principles are set out within this policy that can be considered in respect of the proposals. As has been set out previously in this regard the main considerations applicable to the development proposed are those relating to the large-scale nature of the development and the associated scale of its impact on the countryside and the appreciation and enjoyment of it in this feature of the County, with such impacts being considered to be negative.

**Mitigation**

158. Core Strategy Policy CS8 – Developer Contributions

159. Policy CS8 states developer contributions will be sought to ensure that new development meets the reasonable costs of providing the on and off-site infrastructure requirements to meet the needs for additional or improvements to existing local and strategic infrastructure, services and facilities that would mitigate and/or compensate for the impacts generated by the new development.

160. See consideration of policy CS16 for reference to the potential for community benefits to accrue from the development.

161. Core Strategy Policy CS16 – the Rural Economy

162. The proposal's benefits in terms of its impact on the rural economy are likely to be complex in nature and will vary over time dependant on what stage of the project is underway at the time.

163. There will be a direct benefit to landowners in relation to the land on which the proposed development is undertaken, however this is a private benefit and will not directly benefit the local economy except through support of those landowners and their increased spending power. There is likely to be some benefit to the local economy through spending associated with the construction phase, there may be scope for local contractors to be employed in elements of the project and there may be some spending in the local area undertaken by construction workers engaged in the project. However this is difficult to predict and is a transitional benefit that is likely to be reduced to zero once construction work is complete.

164. The Local Planning Authority consider it appropriate for the developer to provide a community benefits package in order to secure some wider benefits for the local community who will be most impacted by this national infrastructure project, as well as a community benefits offer across the whole of the Rutland County Council area, given the small geographic and population size (less than 42,000 people) of the county and the strategic size of the infrastructure project.

165. It is not clear at this stage if the applicant would agreed to provide such a package or at what scale it might be provided. It should be noted that there has been no discussions between the local community or Local Planning Authority with the developer at this stage regarding any benefits.

166. Biodiversity

167. The application indicates that there will be limited biodiversity impacts associated with the development due to the nature of the existing land being used to provide the panels, with the main identified effects being the loss of a

section of hedgerow to the Macmillan Way and the loss of grassland within existing verges. It is also noted that the proposed scheme includes a number of areas of planting that would also constitute mitigation relevant to biodiversity considerations, and the provision of management plans to ensure that biodiversity features are appropriately maintained throughout the lifetime of the development. The Local Planning Authority does have some concern however that the planting proposed is limited in quality, with much of it being limited to 'proposed tussock grassland with wildflowers' with only one small area of woodland copse and one are of wet woodland planting proposed.

168. Given the extensive nature of the site, the stated landscape objectives for the area and the scale of the impact of the proposal on the area, the Local Planning Authority considers that planting proposals for the site are not proportionate to the impact of the development, and therefore would have an overall negative impact when compared to the development proposed.

**Decommissioning**

169. The application is proposed on a permanent basis. It is the Council's opinion that this has the potential to have a negative impact. There will inevitably be significant improvements in the efficiency of solar panels over the lifetime of this development and this could result in the possible reduction in the overall site area covered by panels. If the DCO is allowed it should ensure that these future technological advances are secured and built into the ongoing operation of the scheme and where panels are no longer required that the land is returned back to agricultural use or formally restored to provide wider biodiversity enhancements.

**Minerals**

170. Policy 10 of the current Minerals Core Strategy and Development Policies DPD states:

MDC Policy 10 – Development in Mineral Safeguarding Areas
Planning Permission will not be granted for any form of development within the Mineral Safeguarding Area that is incompatible with safeguarding the mineral and significant infrastructure such as rail linked facilities unless:
• The applicant can demonstrate to the satisfaction of the Mineral Planning Authority that the mineral concerned is no longer of any value or potential value or that significant deposits of a similar quality exist elsewhere in the County; or
• The mineral can be extracted satisfactorily prior to the development taking place; or
• The incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
• There is an overriding need for the development; or

• The development is of a minor nature* which would not inhibit extraction of the mineral resource; or
• The development is, or forms part of, a specific site allocation in the Development Plan.

*minor nature will normally include sites with a floorspace or site area below 10,000 sq m (1ha). However, it will be at the discretion of the Council if proposals above this threshold were deemed to be minor depending on the nature of the proposal and the mineral concerned.

171. Whilst long term, the solar farm is still of a temporary nature and so unlikely to inhibit extraction within the timescale that the mineral is likely to be needed. It is considered that the solar farm will not permanently sterilise the mineral resources in the area.

Appendix 1

**LLFA Comments/Written Representation**

The LLFA have concerns regarding this site and the possible risk of flood from overland flow and increased flows into the River Glenn

The flood Risk Assessment states in section 3 – “The Strategy identifies that the implementation of PV Arrays will not contribute to an increase in hardstanding areas and that hardstanding is limited to the extents of the Onsite Substation and Solar Stations”.

Theses areas require relatively small areas of hard standing which can have positive discharges into either the adjacent water course (onsite substation) or to the grass around the Solar Stations. These are at a restricted rate which on their own wouldn’t cause a flood risk.

Within the flood risk assessment there has been no consideration to the compaction of the soil under the PV Module. The PV Module require a concrete base for foundations which is then back filled, and grass laid on top. Consideration has only been given to a PV Module drip line. The assessment suggests that there is no possible infiltration at some location, but other areas have good infiltration. The compaction of the soil under the large area of PV Modules, could result in the good infiltration locations becoming poor. This would result in surface water flows running across land and getting into watercourses quicker, posing a flood risk. This would result in a negative impact on the whole life of the development.

Therefore, I think more information needs to be provided considering the lie of the land, existing ground conditions and areas of infiltration and if areas of the land can be used for natural flood management (NFM). This will have a positive impact on the whole life of the development, as land can be used as part of the NFM.

If the site were to go forward before additional information is received, I would recommend 2 conditions;

**Condition 1**
The development hereby permitted shall not commence until details of the design, implementation, maintenance and management of a surface water drainage scheme have been submitted to and approved in writing by the local planning authority. Those details shall include:

a) Information about the design storm period and intensity (1 in 30 & 1 in 100 (+30% allowance for climate change), discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control surface water discharged from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters;

b) Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);

c) Flood water exceedance routes, both on and off site;

d) A timetable for implementation;

e) Site investigation and test results to confirm infiltrations rates; and

f) A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management and maintenance by a Residents' Management Company or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.

**Reasons**
To ensure that the proposed development can be adequately drained.
To ensure that there is no flood risk on or off the site resulting from the proposed development.

**Condition 2**
No development shall take place until a Construction Management Plan and Method Statement has been submitted to and approved in writing by the Local Planning Authority which shall indicate measures to mitigate against flooding of the site and neighbouring properties up and downstream, during the construction stage of the proposed development. The Construction Management Plan and Method Statement shall include:

- strategy stating how surface water run off on and from the development will be managed during construction and protection measures for any sustainable drainage features. This should include drawing(s) showing how the drainage systems (permanent or temporary) connect to an outfall (temporary or permanent) during construction.
  - And including phasing of the drainage systems in relation to the build out of the site

The Construction Management Plan and Method Statement shall be strictly adhered to throughout the construction period.
Reason: To ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, the permitted development during construction and to ensure that suitable traffic routes are agreed.

## Appendix 2

## Local Highways Authority comments

The proposal will have a negligible and barely noticeable impact in terms of traffic generation (both trips and size of vehicles) once constructed and commissioned. It has also been agreed that the impact at decommissioning stage will be determined nearer that time given the intended operational period is 40 years.

The primary impact of this development will be during construction and the following points have been considered:-

1. Suitability of proposed routes for large construction/delivery vehicles on the highway network

- The proposed routes will provide a one-way system from and to the strategic road network for hgv's. Incoming vehicles will travel from the A1 to the primary compound via the B1081, Ryhall Road, A6121 and Uffington Lane. Outgoing vehicles will travel from the primary compound to the A15 via Uffington Lane, the A6121 and A151. Whilst there will be an impact on all routes used by the construction vehicles, this route management strategy will lessen the impact as opposed to using one route only, other than Uffington Lane. LGV's could use either of these routes or a third route from and to the A15 via Stamford along the A6121 and the A1175.
- An assessment has been carried out and identified three junctions requiring improvement works to mitigate the impact of the increased trips and types of vehicles. These are Ryhall Road with the B1081 (in Great Casterton), Ryhall Road/ B1176/A6121 (in Ryhall) and Uffington Lane with the A6121 (southwest of Essendine). There will be a moderate to high impact to road users during the construction of these junction improvement works, however in the overall scheme of the proposal, this will be for a limited time and can be managed safely with the installation of temporary signals.
- Due to the existing narrow width of Uffington Lane and the need for two hgv's to potentially pass one another during construction, the Local Highway Authority (LHA) requested the construction of passing bays, which has been agreed. There will be a moderate impact to road users during the construction of these, which will require the use of temporary signals for safety and therefore will cause some delays for a short period of time.
- Whilst there are no weight restrictions or otherwise on the two routes used as a one-way system from the strategic road network to the primary compound, the LHA were concerned about the increase in trips and larger vehicle types, particularly along Ryhall Road, Great Casterton, during school start and finish times. Therefore, the LHA advised that we would strongly recommend a restriction for large construction/delivery vehicles during these times along Ryhall Road. It is noted that this has been included within the Outline Construction Traffic Management Plan (oCTMP) and should be secured by way of a Requirement on the Development Control Order (DCO) through the oCTMP. Should this be agreed by the Planning Inspectorate, there will be no impact from large construction/delivery vehicles during school opening and closing times.

- Whilst members of the public have raised concerns about the use of Ryhall Road for construction vehicles in general, it is important to note that this route has no restrictions (weight or size) in terms of hgv's and furthermore is a route designated for abnormal loads. Stamford and Little Casterton has a blanket 7.5 tonne weight limit, so Ryhall Road would regularly be used by large vehicles travelling from the A1 northeast bound and vice versa. As such, the LHA consider the impact to be low as the route is already regularly used by large vehicles, notwithstanding the fact that the developer is proposing junction improvements either end of Ryhall Road, which will be beneficial to all.
- Accident analysis was also carried out along the proposed routes to establish if there are any areas of concern or cluster patterns of accidents within the public highway, and in particular relating to hgv's. The results showed that there were no areas of concern, which would suggest the impact is negligible.
- Adequate vehicle to vehicle visibility is provided from the access to the primary compound, as demonstrated in the oCTMP, and furthermore a maintenance regime has been agreed to ensure the splays are maintained free of obstruction. Given this, the impact is low, subject to this being secured by way of a Requirement on the DCO.

2. Assessment of traffic generation

- Whilst there would be an impact from the increase in vehicles as a result of the construction, the impact on individual roads by hgv's have been lessened by virtue of the proposed traffic management system and introduction of a one-way routing from and to the strategic road network as explained above.
- The proposed trip generation has been robustly assessed and agreed, together with an assessment of the impact on individual affected junctions in peak hours. None of the junctions trigger the 30 two-way trip criteria which the LHA use and therefore there is no need for full junction assessments. In addition, the proposal within the oCTMP is that no construction or delivery vehicles will travel to and from the primary site during peak hours. Given this the impact is considered negligible during peak hours.
- Within the Transport Assessment, the development is likely to generate a maximum of 54 two-way HGV trips and 105 two-way LGV vehicles daily, which will have a negligible impact on the surrounding road network.
- All site construction staff will arrive before 7am and depart after 7pm, therefore there will be no impact on peak hour traffic.
- Within the Travel Plan and Transport Assessment, there are measures to reduce traffic from the primary compound to the secondary compounds by provision of a shuttle bus, which will further reduce the impact from staff traffic on the surrounding and affected road network, albeit well outside of peak hours.

3. Suitability of accesses to secondary compounds

- The proposal includes the use of widened existing field accesses and provision of some new accesses, all of which will have a low to moderate impact on road users during their construction whilst traffic signals are in use to manage traffic safely.
- Once the accesses to the secondary compounds are complete, there will be an impact from vehicles entering or exiting them, which are primarily off rural roads with derestricted speed limits. The slow vehicle movements associated with

these would be a cause for concern, however it is proposed to mitigate this impact by introducing temporary 30mph speed limits during the full extent of construction, and therefore the LHA are satisfied that any highway safety concern can be eliminated subject to detailed design. In terms of impact on road users, there could be a negligible to low impact caused by a slight delay should a vehicle be waiting to turn in to the access, although for those existing accesses, this would have been the case with farm vehicles in any event.

- There is one proposed access on the junction of The Drift with the B1176, which is currently a grassed field access. Whilst it is acknowledged by the LHA that this is an existing field access, the location and orientation of the access is not acceptable as shown and raises highway safety concerns. If this location and orientation is agreed as currently proposed, the LHA are of the view that this will be a high impact due to highway safety concerns. The LHA will be recommending that a new location is found for an access nearby, orientated at 90 degree to the carriageway, to address the safety concerns, which will reduce the impact to low.
- All accesses to secondary compounds are proposed to have a temporary speed limit of 30mph applied, which the LHA would support for safety reasons. The impact of these will cause a very slight delay to road users in journey time, so the impact would be categorised as low.
- Adequate vehicle to vehicle visibility is provided from each access, as demonstrated in the oCTMP, and furthermore a maintenance regime has been agreed to ensure the splays are maintained free of obstruction. Given this, the impact is low, subject to this being secured by way of a Requirement on the DCO.

4. On site provision for parking, loading/unloading and turning

- The proposal includes the provision in principal of parking, loading and unloading facilities within the primary and secondary compounds, and use of these will be managed under the CTMP. This will remove any risk of vehicles waiting or holding up other road users on the public highway, so the risk is nil to negligible. However, in order to ensure the level of parking is suitable throughout the entire construction period, usage must be monitored and increased if necessary.
- As well as on-site parking, loading and unloading facilities, each compound must provide additional and adequate space for the largest anticipated vehicle to enter in forward gear, turn within and leave the site in forward gear. This will eliminate the need for any reversing manoeuvres within the public highway and should be secured by way of Requirement under the DCO. Subject to the imposition of the Requirement, the impact will be nil. Detailed plans are yet to be provided, which should be a Requirement under the DCO.
- Depending on how the gates for each compound are to be operated (open all day/opened on arrival and departure), they will need to be located at a distance from the carriageway that will ensure the largest anticipated vehicle can fully exit the main carriageway whilst waiting to enter the site, should that be the case. The oCTMP refers to a set back of 20m, which is sufficient for a hgv, tractor and trailer, etc. but this should be secured by way of a Requirement on the DCO, which if secured will be a negligible to low impact on other road users.
- There are no detailed plans of this information, so this must be a pre-commencement Requirement of the DCO.

5. Impact on surrounding road network including overrunning of verges

- The impact of overrunning of verges from hgv's associated with the development is negligible to high, depending on the location. However, widening of certain routes or the installation of passing bays, combined with a detailed pre-commencement and post-completion highway survey (full extent of the public highway including verges) should reduce the impact to negligible in all locations. It will be recommended that these items are secured by way of a Requirement on the DCO, with any remedial work being the responsibility of the developer.

6. Mud and detritus on the highway

- Para. 4.9.1 states that wheel wash systems with rumble grids will be installed at all accesses. However, this does not provide sufficient detail and as a result could result in mud on the highway raising a highway safety issue and therefore a high impact. The LHA request that further information is supplied regarding the wheel wash system and request that they are drive thru jetted systems, which all vehicles must drive thru upon exiting the sites, and the area between said wheel wash and the public highway is surfaced with bound material. If this is agreed, then the risk of mud on the highway is removed/lessened and the impact with be low.

In summary, there are varying degrees of impact depending on what element is being considered, but overall, should the recommended Requirements, as shown above, be secured on the DCO, the impact is generally low to moderate. Whilst the junction improvement works may give a moderate to high impact, this is based on journey delay times, however this will be for a relatively short time period, not the whole two year construction period. Where impacts are shown as negligible, low or moderate, but based on recommended Requirements on the DCO, should these not be secured the impact would increase, in some cases to high.

## Appendix 3

## Archaeological Consultant Advice

We have reviewed the developer's submitted Cultural Heritage assessment contained within the Environmental Statement (Vol. 1, Chapter 8: Cultural Heritage: Document Index (DI): APP-038) and attached appendices, (DI: 066-070), together with indicative and illustrative layout plans for the proposed scheme (DI: APP-006-008). Particular consideration has been given to the conclusions of the Cultural Heritage Impact Assessment (ES Vol. 2, Appendix 8.4; DI: APP-068), together with the results of the Geophysical Survey Report (ES Vol.2, Appendix 8.5; DI: APP-069), the Interim Trial Trenching Summary Report (ES Vol. 2, Appendix 8.6; DI: APP-070), and the Outline Cultural Environmental Management Plan (EN010127/APP/7.6; DI PDA-006).

*Environmental Statement Vol.1, Chapter 8, Cultural Heritage*

The environmental statement is written to suggest that a sufficient assessment has been undertaken to fully support an application, however the assessment is inadequate and incomplete and therefore there is not enough information to fully understand the cultural heritage impacts and consequently it is unable to inform a clear mitigation. Further evaluation is needed for an informed decision regarding the cultural heritage to be made. This is essential to understand the extent, character and significance of the archaeological remains to enable a satisfactory mitigation plan.

The evaluative tools used so far, desk-based assessment, geophysical survey, and in particular the limited trenching, are insufficient to adequately inform a detailed mitigation plan. It is suggested that a 'no-dig' method can be used such as 'concrete or ballast shoes' (para 8.3.4), however the methodology for the use of shoes can include excavation, and the potential impact of development will also include the need for service cabling and other infrastructure, including the proposed construction compounds. It is notable that in the context of the latter, the principal construction compound has not been evaluated, despite its potential impact upon underlying archaeological remains. Without adequate trenching it is unclear whether such an approach is either suitable or achievable, particularly noting the generally shallow depth (c. 0.3-0.4m) of topsoil sealing the archaeological deposits. It has been our experience that a 'no-dig' method often comes with digging down to install the shoes. In addition, the shoes are heavy and with the shallow nature of the site, has the potential to compact the archaeology, and damaging any material culture within.

In areas where a 'no-dig' method cannot be used, it is proposed that 'small-scale and localised archaeological excavations will take place' (para 8.3.5). The mitigation is regarded as a 'critical component' (para 8.3.4), however we find it to be lacking in detail and poorly justified. It is not apparent that identification of important remains have been given any priority within the assessment, shown by the failure to adequately trial trench or present this information within the trenching report. Without this information it is not possible to determine the location and extent of these key remains let alone establish their appropriate mitigation requirements.

*Outline Construction Environmental Management Plan*

The outline Cultural Environmental Management Plan (oCEMP) provides an inadequate outline of the suggested mitigation approach to the buried cultural heritage. The oCEMP (Table 3-3) indicates the preparation of a Written Scheme of Investigation for Archaeological Mitigation, to be attached to the Trial Trenching Report (Appendix 8.6). This is not included with the submitted documents. As expressed above, we do not believe a satisfactory mitigation plan can be informed with the current available information. The CEMP acknowledges that some areas may require to be mitigated by preservation in situ. This must remove the development impact entirely, however the oCEMP appears to specifically exclude this in relation to cable routes, where 'monitoring' is proposed. Given the potential disruption to the delivery of the scheme, these areas should be known about before any development to ensure they are protected adequately by being removed from the red line boundary or fenced off to aid in the preservation. The oCEMP states that 'On-going archaeological evaluation and assessment under the WSI will allow for the identification of any areas where preservation in situ is the preferred strategy' (CEMP Table 3-3, p23). This makes it clear that further evaluation is required, and that the implications of this work cannot yet be adequately understood, and appropriate mitigation determined.

*Cultural Heritage Impact Assessment*

In support of the submitted application the developer has presented the results of a Cultural Heritage Impact Assessment (DI: APP-068). The report represents an adequate appraisal of the known resource, drawing upon the available archaeological and heritage data, as outlined in Section 2. However, the limitations of the current assessment are outlined in paragraph 2.22. The report notes that existing datasets are based upon historical and antiquarian record, as well as the work of more recent archaeological surveys. As such the current record must be assumed to be incomplete, presenting a record of the currently known resource, not a definitive record of all surviving heritage assets. Consequently, the conclusions of the CHIA do not preclude the subsequent discovery of further significant and as yet unassessed heritage assets. An example of the discovery of previously unknown archaeological remains is quoted in the CHIA (para 3.15-16); previously unrecorded early prehistoric flint scatters and later prehistoric settlement, were identified within the current development area by trial trenching, following inconclusive geophysical survey. The identified remains, deemed of local and regional significance, were subsequently excavated in advance of development. It is expected that similar evidence may well be more widely present, however without adequate evaluation, the state of preservation, significance and implications for the proposed development of such remains cannot be confidently anticipated.

While the CHIA notes the completed results of the developer's geophysical survey (DI: APP-069, below) and includes their interpretation in its considerations (para 3.9-3.13), the report indicates that only the interim results of the on-going trial trenching investigation (DI: APP-070, below) were available at the time of writing. Despite the assertion that the interim results confirm the conclusions of the CHIA, without the results of a complete and comprehensive assessment, it is not possible to properly evaluate the archaeological potential of the development site, assess the impact of the development upon the significance of any affected remains, or determine the need for and scope of appropriate mitigation.

LiDAR assessment reveals evidence of the extent of the pre-enclosure drainage pattern, former tributary streams and channels of the West Glen River. These buried features would have represent significant landscape features from the early prehistoric periods to as late as the mid-19th century, and have the potential for palaeoenvironmental remains of all periods, especially where they interact with or lie in the vicinity of know archaeological evidence, such as the prehistoric and Roman cropmark and geophysical complex south east of Essendine (Fig. 3, 84). Running broadly west to east through W1, W3, P2, P5 and P6, M1, PF3, PF4 and PF7. Although the limited trial trenching undertaken as part of the scheme has failed to locate evidence of palaeoenvironmental remains, previous archaeological investigation has identified well-preserved deposits with the potential to provide valuable landscape information (Fig. 3, 2).

Although the CHIA concludes that it has determined 'as far as possible' the significance of the identified and potential heritage assets, likely to be affected by the scheme, it is considered that in the absence of a completed trial trenching programme, the presented assessment is incomplete and inadequate. The report also states that any physical or non-physical effects of the proposals upon the significance of heritage resources will be a material consideration in the determination of consent. The report anticipates that the scheme may impact upon both potential and known below ground archaeological remains. In the latter case, the presence of known archaeological remains is at least in part evidenced by the geophysical survey and the interim results of the limited trial trenching. However the extent, character and significance of the resources has not been satisfactorily established in accordance with the NPPF, EIA Regulations and the National Policy Statement for Energy (EN-1), specifically due to the limited trial trenching programme, further compounded by the failure to fully report upon the limited results available. Impacts are expected in those areas affected by below ground services and the construction of the schemes infrastructure (sub-stations, services, etc.). Extensive impact will also be caused by unmitigated construction of the proposed solar arrays, it is essential that in order to establish the appropriate extent of any required mitigation, including the need to preserve affected remains in situ, a full and thorough assessment should be completed by the developer. In advance of such assessment it is not possible to determine the suitability or capacity of the scheme to mitigate its impacts upon the archaeological resource.

Geophysical Survey Report

The developer has presented the results of a geophysical magnetometer (magnetic) survey of the development area (Appeal Document Index reference: APP-069). The work has been undertaken by an experienced practitioner and presents a thorough investigation of the development area, within the constraints of the methodology. The survey has examined all surveyable areas (excluding c. 21 ha. due to local ground conditions and/or cropping) and presenting the results to an appropriate professional standard. As noted in the report (para 1.2), magnetic survey is the standard primary geophysical method for archaeological applications in the UK due to its ability to detect a range of different features. The report particularly emphasises suitability of the technique to identify anomalies indicative of fired or magnetically enhanced features, such as ditches, pits, kilns, sunken featured buildings (SFBs) and industrial activity. Consequently archaeological features with a poor or absent magnetic character will be under represented or absent from the survey data.

The report also provides a useful statement against which to review the survey results (para 7.1.1), stating that the technique will only identify features that can be detected against the natural background, and where the content or character of those features is detectable by the survey method. Furthermore the interpretation of any identified anomalies, taking into account the competence of the survey team, is inherently subjective, and as such, it is often not possible to classify all anomaly sources. The only way to improve the interpretation of results is through a process of comparing excavated results with the geophysical reports. It is not apparent that the results of the trial trenching have been reassessed by the developer's geophysical specialists.

Trial trenching Report

The developer has presented the interim results of a trial trenching investigation of the development area (DI: APP-070). The report states it represents a short interim summary and notes a full report is to follow. No subsequent report or update of the existing report appears to have been submitted. In that context, the following assessment is based upon the partial account presented in the interim report. The later provides outline results from c. 120 excavated trenches, all of which lie within Rutland, although the report numbers and depicts trenches in Lincolnshire in evaluation Area M11, as well as indicating trenches (unnumbered) in areas P1, N3-8 and N11-12. The absence of trenching results from the adjacent development areas weakens the overall trenching results, given the lack of context it presented.

The trenching represents a very limited sample of the development area. Considering only those areas proposed for solar arrays and associated infrastructure, only three areas appear to have been adequately sample trenching (P12 (2.4% of the developable area, e.g. solar panels, infrastructure and services, excluding landscaping), PF 1 (2.0%) and PF7 (5.8%). Six areas have not been targeted at all by the trenching programme (P5, P7/8, M4, M5, M9 and PF2), while the majority of the remaining areas have been targeted with an inadequate sample of between 0.13% and 1.55%. It is recommended that in response to a completed geophysical survey a minimum of 2% of the site area (with provision for addition contingency trenching) is undertaken. Where no prior geophysical survey has been undertaken a c. 5% sample is recommended. As indicated above with reference to the Geophysical survey results, trial trenching is necessary in order to adequately determine the validity, and character of the anomalies detected by the geophysical survey, and where confirmed, to establish their archaeological significance. It is commonly the case that additional undetected archaeological features will be identified by the trial trenching, owing to the inability of geophysical survey to located all sub-surface archaeological remains. As such trial trenching should be used to examine both the detected geophysical anomalies, and to test those areas apparently negative – without anomalies.

| Area Ref.(TT Report) | Indicative developed area (approx.) | Area trenched (@ 100 $m^2$) | Percentage Area Trenched (estimated.) |
|---|---|---|---|
| W1 | 6.6 ha | 100 $m^2$ (Tr 56) | c. 0.15% |
| W2 | 22.9 ha | 600 $m^2$ (Tr 57-62) | c. 0.26% |

| | | | |
|---|---|---|---|
| W3 | 34.2 ha | 800 $m^2$ (Tr 46-55) | c. 0.23% |
| P2 | 20.0 ha | 700 $m^2$ (Tr 68-74) | c. 0.35% |
| P3 | 4.8 ha | 400 $m^2$ (Tr 75-78) | c. 0.83% |
| P5 | 6.5 ha | 0 $m^2$ | 0.00% |
| P6 | 10.0 ha | 200$m^2$ (Tr 79-80) | c. 0.20% |
| P7/8 | 14.0 ha | 0 $m^2$ | 0.00% |
| P10 | 4.7 ha | 400$m^2$ (Tr 81-84) | c. 0.85% |
| P11 | 1.9 ha | 100$m^2$ (Tr 86) | c. 0.52% |
| P12 | 2.5 ha | 400$m^2$ (Tr 91-96) | c. 2.40% |
| P13 | 13.5 ha | 400$m^2$ (Tr 87-90) | c. 0.29% |
| P14 | 7.8 ha | 100$m^2$ (Tr 85) | c. 0.13% |
| M2 | 9.5 ha | 400 $m^2$ | 0.00% |
| M4 | 14.6 ha | 0 $m^2$ | 0.00% |
| M5 | 7.0 ha | 0 $m^2$ | 0.00% |
| M6 | 17.6 ha | 600 $m^2$ (Tr -) | c. 0.34% |
| M7 | 9.6 ha | 600 $m^2$ (Tr -) | c. 0.65% |
| M9 | 17.2 ha | 0 $m^2$ | 0.00% |
| M10 | 32.0 ha | 1900 $m^2$ (Tr -) | c. 0.59% |
| PF1 | 4.0 ha | 800 $m^2$ (Tr 97-104) | c. 2.00% |
| PF2 | 2.0 ha | 0 $m^2$ | 0.00% |
| PF4 | 8.6 ha | 400$m^2$ (Tr 108-111) | c. 0.46% |
| PF5 | 2.2 ha | 300$m^2$ (Tr 105-107) | c. 1.36% |
| PF7 | 1.7ha | 1000$m^2$ (Tr 112-121) | c. 5.88% |
| PF8 | 11.0 ha | 1700$m^2$ (Tr 122-138) | c. 1.55% |

In addition to the inadequate trial trenching coverage of the development area, the submitted report provides only a partial account of the fieldwork undertaken, with many trenches (e.g. Tr 97, 99, 101-104, 111, 113-115, 127) referred to as 'still under investigation'. Although the report makes occasional reference to the recovery of pottery (predominantly attributed to the Iron Age and Roman periods), animal bone, slag, metalwork and ceramic building material, no assessment of the finds assemblage is presented and is not possible to attribute finds to their context. The lack of finds analysis and reporting undermines confidence in the archaeological conclusions and falls substantially below accepted professional standards for the reporting of archaeological investigations. No indication is provided to determine whether environmental sampling and assessment has been undertaken, despite the investigation targeting a diverse range of features including some with a likely funerary context and taking into account the acknowledged potential for palaeoenvironmental remains.

In the absence of any of this data, together with the paucity of trial trenching coverage, the submitted assessment is regarded as an inadequate and incomplete record of the investigation. A such the assessment falls substantially short of the requirements outlined in the NPPF and the Overarching National Policy Statement for Energy (EN-

1), notably the applicant's duty to provide a description of the significance of the heritage assets affected by the proposed development (5.9.10), and to ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents (5.9.12).