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CARDIFF COUNCIL

LAMBY WAY SOLAR FARM

DESIGN AND ACCESS STATEMENT

FEBRUARY 2019

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CARDIFF COUNCIL

LAMBY WAY SOLAR FARM

DESIGN AND ACCESS STATEMENT

FEBRUARY 2019

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1 INTRODUCTION

1.1 Synopsis

The purpose of a Design and Access Statement (DAS) is to provide a clear and logical document to demonstrate and explain the various facets of design and access in relation to the application site, and outline planning policy relevant to the proposal. The DAS also acts as a method of demonstrating the details of a planning application in a way that can be read by both professionals and the public.

1.2 Overview of the Proposals.

Wardell Armstrong LLP has been instructed by Cardiff Council (the applicant) to prepare a planning application for the construction of a ground-mounted solar farm and associated works on land at Lamby Way landfill site. The development will relate to a site area of 16.89 Ha and provide an expected output of 8.7MW.

The installation of a series of solar panels will be formatted in rows across the site, in an appropriate south facing direction and at an angle of approximately 20 to 25 degrees from the ground.

The installation will include an estimated 30,688 individual panels combined to form arrays that are arranged in rows. Each array will be supported by a galvanized steel mounting structure supported on a surface mounted ballasted/concrete pad. The arrays are not proposed to exceed 2.8m in height and the lower edge will be will be approximately 750mm above ground level. All panels will be secured onto a ballasted/concrete pad with no penetrative or demolition works proposed.

The eastern portion of the application site comprises of a former landfill site which has since been capped such that it now resembles a grassland habitat. In addition, the site is in close proximity to the Severn Estuary designations and the Gwent Levels: Rumney and Peterstone SSSI.

The electricity supply generated from the solar panels will be fed into the National Grid, connecting to a substation found to the north of the site via the installation of subterranean cabling.

The proposed development also requires the installation of ancillary containerised and similar structures containing high voltage electrical equipment including inverters, transformers and switchgear. Each will be set on a concrete raft foundation to spread the load across a wider area.

The solar panel site will require appropriate security protection and as such a fence will be installed at its perimeter with a network of CCTV cameras within the site itself.

The site is in close proximity to the Severn Estuary designations (Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area and RAMSAR site) and the Gwent Levels: Rumney and Peterstone SSSI – all designations to be treated as 'Ecological Assets'.

1.3 Structure of the Document

The DAS will start by studying the features of the site and provide a contextual analysis in regard to the local character and surrounding land uses, concluding with the identification of key issues. Following this, the planning policy framework with which to appraise the development proposal will be put forward. The document will go on to examine the relevant design and access facets before holistically assessing the planning permits associated with the scheme. The document will finish by concluding why the proposal should be given planning permission.

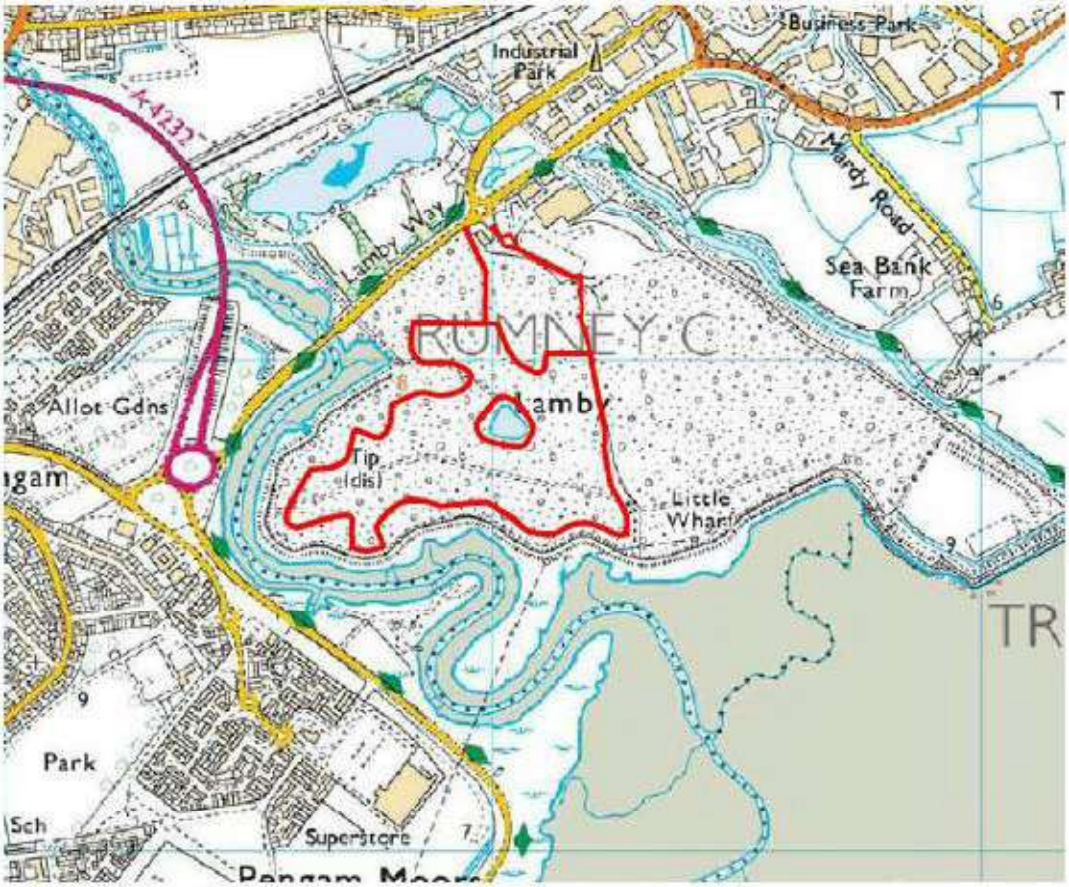
2 SITE CONTEXT AND ANALYSIS

2.1 Location and Access

The site is located within the vicinity of the district known as Rumney, located to the east of Cardiff and therefore falls under Cardiff Council jurisdiction.

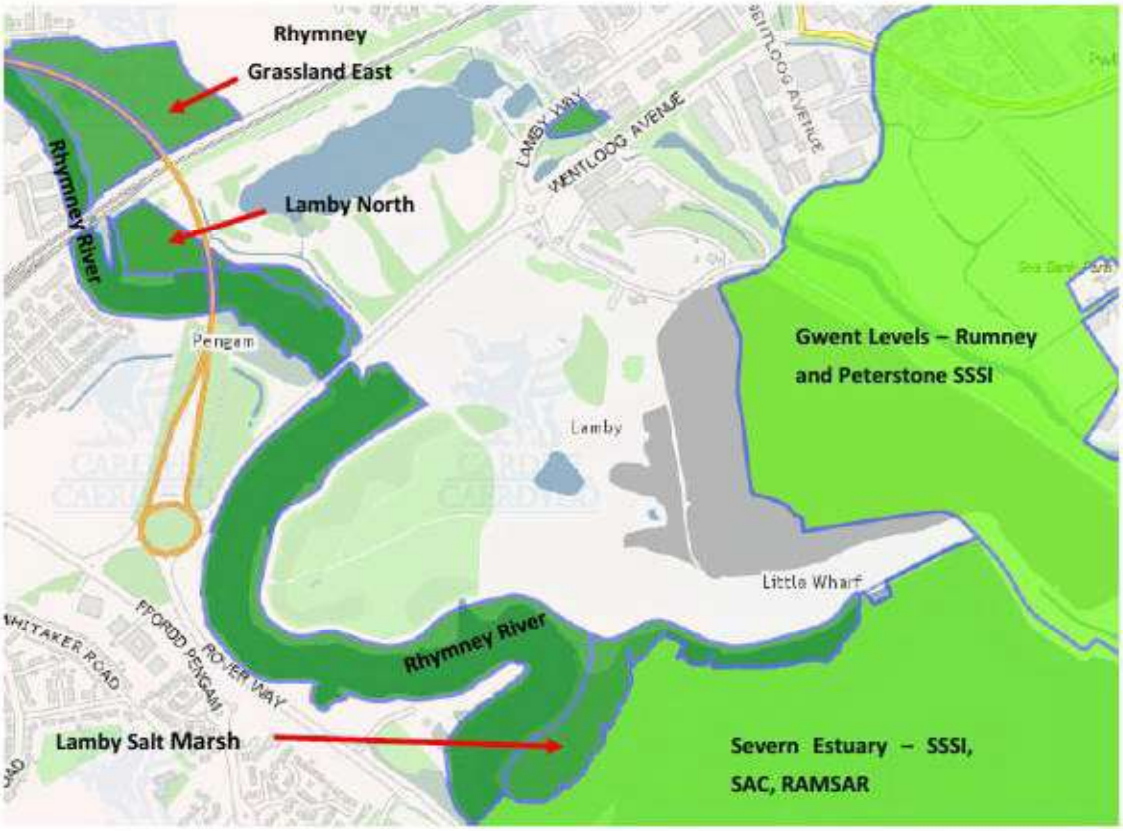
The application site consists of a 16.89Ha parcel of land that is generally bounded by the Rhymney River to the south west, Lamby Way to the north west and the Severn Estuary to the south and south east. The remainder of the landfill site bounds the site to the east.

Figure 1: The application site and the surrounding area



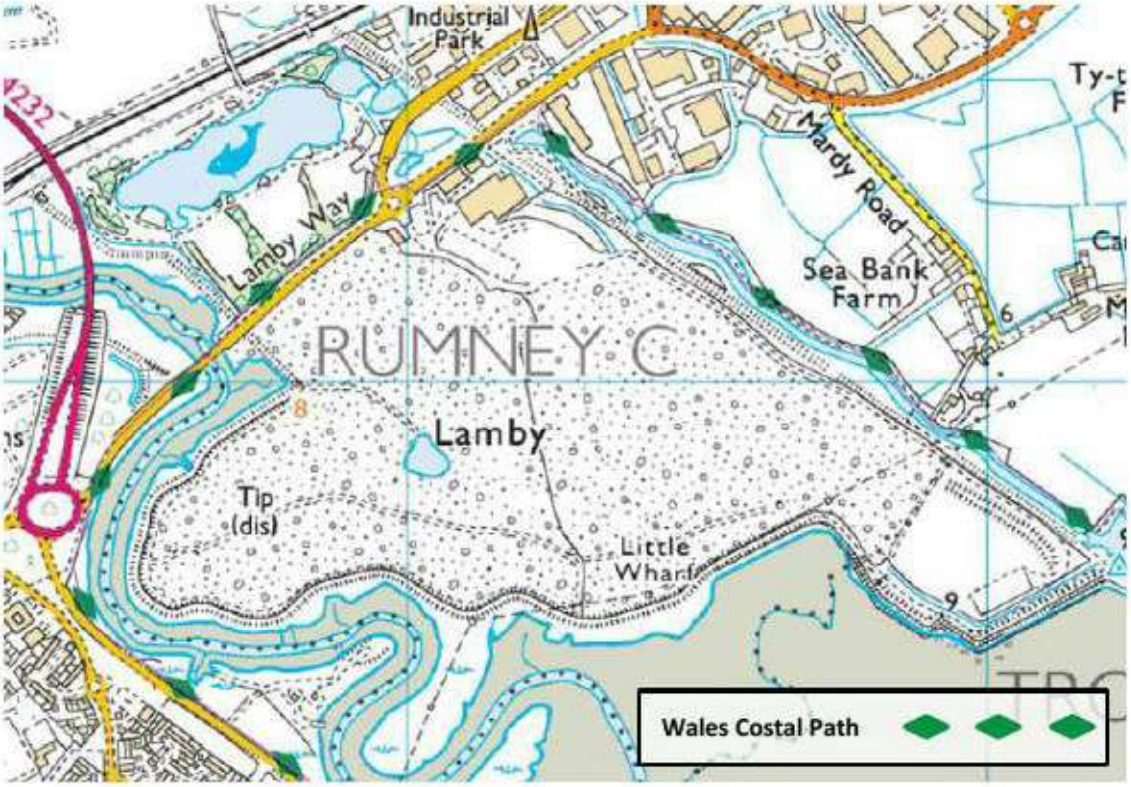
There are several ecological assets located in close proximity to the site including the Severn Estuary designations (Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area and RAMSAR site). Furthermore, the Gwent Levels: Rhymney and Peterstone SSSI is located approximately 114m to the east and the Rhymney River which constitutes a Local Nature Conservation Site is found to the west.

Figure 2: Map illustrating ecological assets near to the application site (courtesy of http://ishare.cardiff.gov.uk/). Not to scale.



The Wales Coastal Path is situated approximately 110m away from the site to the north of the site. In total the Wales Coastal path provides leisure and amenity value to the welsh coast. Figure 3, displayed overleaf, illustrates the exact location of the current Wales Coastal Path around the Lamby Way site.

Figure 3: Map of the Wales Coastal Path near to the Lamby Way site (courtesy of: https://www.walescoastpath.gov.uk/plan-your-visit/interactive-coast-path-map/).



The site can be accessed via Lamby Way, located to the north west of the site. Additionally, the A4232 is positioned to the north west of the site providing direct access to the A48 and further access to the M4.

Several bus stops are situated further to the north of the site. The Brachdy Lane bus stop is the closest public transportation stop to the application site (approximately 0.5 miles to the north) and offers several services between St Mellons, Llanrumney and Cardiff.

For completeness, a satellite image of the site of the application site and the surrounding area which illustrates the main transport links is shown overleaf.

Figure 4: Map denoting the accessibility of the Lamby Way site (image courtesy of Google.com)

For further information in respect of the application site location, please refer to Drawing: LAM-DWG001, which also shows the extent of Cardiff Council's land ownership surrounding the site.

2.2 Land Use Context

The surrounding area is heavily urbanised and comprises of industrial and residential land uses. The nearest industrial point comprises a waste recycling centre known as Cardiff Household Waste and Recycling Centre which is approximately 194m from the northern point of the site. A variety of other industrial businesses lie further afield being active components of the Eastgate Business Park, Waterside Business Park and the Capital Business Park respectively.

The nearest residential settlement is located on the opposite side of the Rhymney River approximately 230m to the west of the site (Tremorfa). In addition, there is another residential settlement (Rumney) and community allotments located to the north west of the site.

2.3 Site Features

The application site comprises part of the former Lamby Way Landfill Site and also adjacent land to the west. The landfill portion has since been remediated and capped, subsequently developing as a rough grassland and shrub habitat. Established woodland blocks are identified around the perimeter of the landfill, partially surrounding the site.

Most of the surrounding land is flat at or below 10m Above Ordnance Data (AOD) with land to the north/ north west rising gently to an area of higher ground. The tip itself forms a local large mound and as such the site is elevated relative to the surrounding landscape. Around its perimeter, the tip is between 9 and 10m AOD and rises to a relatively central point towards the north east of the site at just below 25m AOD.

Reflecting the remediation and capped nature of this site, a network of gas wells are distributed throughout the area to monitor the gas levels within the ground. It is essential that appropriate easements are maintained around each gas well to provide easy access to the infrastructure for maintenance and monitoring purposes. For reference, Figure 5 illustrates the appearance of a typical gas well.

Figure 5: Example of gas infrastructure at former Lamby Way Landfill site.

A 3,000m^2 attenuation pond is situated centrally within the application site. In periods of high rainfall, water from the pond travels down slope towards the north east of the site and discharges directly into the Rhymney River. For the purpose of this application, the pond is not included in the site boundary as it cannot be developed and will remain free of development for ecological purposes. It will however, be utilised for the management of surface water on the site as it currently is. Please see figure 6, which displays an image of the pond area with a red arrow indicating the location of the pond for clarity.

Figure 6: Pond area located centrally within the proposed site.

For further details about the location of the pond area, please refer to drawings LAM-DWG001 and LAM-DWG002.

2.4 Site Access

The application site is currently accessed via a network of private tracks, connecting to the House Waste Recycling Centre (HWRC) to the north, all of which are within Cardiff Council's ownership. The network of private tracks connects to the public highway at Lamby Way which is positioned to the north of the site. A private road connects immediately to the Lamby Way/Wentloog Avenue roundabout found at grid ref. ST21977 78309 which provides access to the east and west of Cardiff.

Lamby Way is well connected to the A48 which in turn offers direct access to the M4.

2.5 Site Visit

An initial site visit to the former Lamby Way landfill was undertaken on 26th November 2018. To provide a further understanding of the current state of the application site, this section comprises a selection of photographs taken at the time of the visit.

Figure 7: Existing maintenance track located to the south of the application site. Presence of linear overhead National Grid infrastructure providing separate service from the coastline.

Figure 8: Gates located to the south of the application site providing access to National Grid services and overhead infrastructure.

Figure 9: Newly installed sub-station located on Lamby Way (north of the application site).

Figure 10: Image displaying pylons surrounding the application site and an example of gas monitoring apparatus (foreground).

Figure 11: Close up of gas monitoring apparatus present within the application site.

3 PLANNING POLICY FRAMEWORK

3.1 Overall Context

The overall planning policy context for the determination of this application comprises the following:-

- Planning Policy Wales (PPW)
- The Wales Spatial Plan (WSP)
- Technical Advice Notes (Wales)
- Cardiff Local Development Plan 2011-2026

These will be summarised under the following subsections. For further details on policies presented in this section please refer to the planning statement to accompany the submission.

3.2 Planning Policy Wales

Planning Policy Wales (PPW) (Edition 10, December 2018) is the Welsh Government's principal planning policy document as it identifies land use planning policy guidance for Wales. Furthermore, PPW confirms that The Environment (Wales) Act 2016 sets a legal target of reducing greenhouse gas emissions by at least 80% by 2050 in addition to other interim targets (for 2020, 2030 and 2040) and associated carbon budgets for key sectors.

The importance of delivering sustainable development is consistently emphasised throughout PPW. The Welsh Government has set targets for the generation of renewable energy:

- For Wales to generate 70% of its electricity consumption from renewable energy by 2030;
- For one Gigawatt of renewable electricity capacity in Wales to be locally owned by 2030; and
- For renewable energy projects to have at least an element of local ownership by 2020.

The Environment (Wales) Act 2016 sets a legal target if reducing greenhouse gas emissions by at least 80% by 2050 in addition to other interim targets (for 2020, 2030 and 2040) and associated carbon budgets for key sectors.

Paragraph 5.7.8 outlines the benefits of renewable and low carbon energy and states that they are of paramount importance. With that in mind, the planning system should:

- Integrate development with the provisions of additional electricity grid network infrastructure;
- Optimise energy storage;
- Facilitate the integration of sustainable building design principles in new development;
- Optimise the location of new developments to allow for efficient use of resources;
- Maximise renewable and low carbon energy generation; and
- Move away from the extraction of energy minerals, the burning if which is carbon intensive.

Sub-section 5.9 of PPW focuses on renewable and low carbon energy and emphasises how planning authorities should facilitate all forms of this type of development. Furthermore, planning authorities should seek to ensure their area's full potential for renewable energy generation is maximised and renewable energy targets are achieved.

In determining applications for the range of renewable and low carbon energy technologies, planning authorities should take into account:

- The contribution a proposal will make to meeting identified Welsh, UK and European targets;
- The contribution to cutting greenhouse gas emissions; and
- The wider environmental, social and economic benefits and opportunities from renewable and low carbon energy development.

Planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of the overall approach to tackling climate change and increasing energy security. In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision-making process, only direct irreversible impacts on statutorily protected sites and buildings and their settings should be considered.

3.3 Wales Spatial Plan

The Wales Spatial Plan (WSP) (updated in 2008), entitled 'People, Places, Futures', sets a strategic framework to guide future development and policy interventions.

A main principle of the WSP is that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources. In addition, the WSP recognises that climate change is an urgent and compelling issue which will have fundamental impact in communities and working environments, the way of life and health and well-being in Wales.

3.4 Technical Advice Notes

Technical Advice Notes (TANs) provide detailed planning advice on a variety of different subjects accompanying the land use policy set out in PPW.

The following TANS are considered to be of relevance: -

- TAN8: Planning for Renewable Energy (July 2005)
- TAN 12: Design (March 2016)
- TAN 15: Development and Flood Risk (July 2004)

3.5 Cardiff Council Local Development Plan 2011-2026

On the 28th January 2016 Cardiff City Council adopted their Local Development Plan (LDP). The LDP is used to guide and manage development, providing a basis by which planning applications will be determined.

Key policies of relevance include the following:

- Policy KP5: Good Quality and Sustainable Design
- Policy KP6: New Infrastructure
- Policy KP7: Planning Obligations
- Policy KP15: Climate Change
- Policy KP16: Green Infrastructure
- Policy EN3: Landscape Protection
- Policy EN4: River Corridors
- Policy EN5: Designated Sites

- Policy EN6: Ecological Networks and Features of Importance for Biodiversity
- EN7: Priority Habitats and Species
- Policy EN10: Water Sensitive Design
- Policy EN12: Renewable Energy and Low Carbon Technologies
- Policy EN14: Flood Risk

3.6 Cardiff Council Supplementary Planning Guidance

Supplementary Planning Guidance (SPG) is introduced to provide further details in specific polices sand proposals contained within Cardiff's Development Plan.

Specific SPG documents of relevance include: -

- Green Infrastructure

4 DESIGN EVOLUTION

Upon appointment of the development team by Cardiff Council, a capacity layout plan was prepared. This showed the maximum development/ energy generation from the site based on an area of 16.5ha and entailed the installation of 1,258 structural support units each containing 24 panels. The maximum output of the application site was calculated as 7.5MW. The first draft of the proposed site layout is illustrated in figure 12 below.

Figure 12: Initial site layout plan of proposed solar farm at Lamby Way

Analysis of the capacity layout through a combination of desk-top research and a site visit identified the following principal constraints:

1. Previous use and site remediation;
2. Ecology;
3. Landscape and Visual Impact;
4. Site security; and
5. Surface water drainage.

The following immediate actions were taken by the team in response:

1. Providing details of existing comprehensive suite of information requested from Cardiff Council;
2. Instruction of ecology assessments to understand the full nature of constraints, both for the site and adjacent land;
3. Instruction of technical assessment to advise on the likely impact from public viewpoints;
4. Identifying the need to ensure sufficient means of enclosure to maintain; and
5. The impact created by a change to the status quo from a drainage standpoint. Instruction of a technical assessment to advise further.

The following commentary on each constraint outlines how the design evolved to address the constraint.

Gas Infrastructure

The application site comprises of a former landfill site therefore, it is essential that the ground gas levels are monitored and maintained on a regular basis. Gas infrastructure including gas wells and pipes are present across the site both above and below the surface of the capping. The gas wells each require an easement of 3m to ensure that they can be easily and regularly accessed. Taking this into consideration led to a significant reduction of the total amount of solar panels that can be installed at Lamby Way if the original site area was to be taken forward.

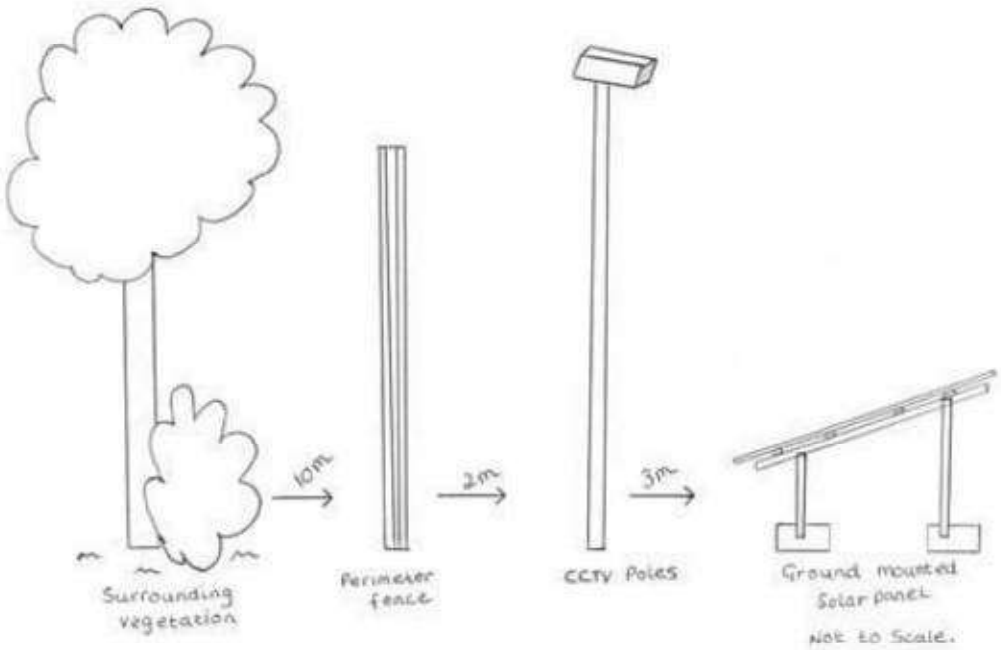
Ecology

Since the remediation of the land at Lamby Way, wildlife has inhabited the site. Part of the site has developed a grassland habitat and, historically, it has been used as an area for reptile translocation. A key part of the design evolution entailed providing enough spacing between the photovoltaic solar panels and small pockets of land around the site to ensure linear corridors for fauna. In addition, maintaining the strips of open grass land surrounding the pond area to allow enough room for birds to take off and land and gain access to the pond.

A 10m radius around the pond has been introduced to ensure that the development does not impact upon the pond habitat and any wildlife using this space. Additionally, a 5m distance between the perimeter fence and the solar panels is proposed to ensure that wildlife can

circulate around the site. The perimeter fence itself has been moved inwards from original intentions as shown in the capacity layout to ensure a 10m clearance from nay tree/scrubs areas.

Figure 13: Sketch of the cross-section of the proposed Lamby Way Solar Farm (not to scale)



Ensuring adequate space has been left clear for wildlife has consequently led to the reduction of space available for in the installation of solar panels within the original site. Subsequently, the total output of the site (originally 7.5MW) would be significantly jeopardised in making these necessary changes.

Landscape and Visual Impact

For the purpose of protecting the surrounding landscape of the application site, a Landscape and Visual Impact Assessment (LVIA) has been undertaken by Wardell Armstrong LLP. Details of this assessment have guided the design of the overall site layout in terms of its shape, solar arrangement and screening.

The site is already well screened to the north and vegetation along the Rhymney River softens views from the west and the LVIA concludes that during operation, effects of the proposed development are not considered to be greater than Negligible to Slight Adverse. Taking this

into consideration, the LVIA does not proposed any additional mitigation that need to be incorporated into the site layout.

Security

It is a legal requirement that appropriate security measures are put in place for the protection of National Grid infrastructure. For that reason, it was essential that the solar farm at Lamby Way was fully enclosed by a secure fencing. Security will ensure there is no animal or human interference with the grid electricity equipment.

The proposed fencing will be approximately 2.2m in height and will run around the entirety of the site's perimeter. As already stated, the fence will be situated at a distance of 10m from any trees outside of the site. It was also key that there was an additional 5m between the fence and the arrays, 2m distance for CCTV camera poles and a further 3m to the arrays.

Surface Water Drainage

To ensure that the proposed development will not cause a detrimental impact to the surface water drainage of the site and subsequently increase the potential of floods, it was considered essential to prepare a surface water drainage strategy to support this planning application.

The strategy proposes the retention of the existing surface water drainage systems that are already in situ comprising of the attenuation pond and the Geocomposite drainage layer which conveys the flow to the existing drainage system. In addition to the existing features, the drainage strategy proposes that rainwater gaps should be designed into the solar panels to allow rainwater to infiltrate into the ground beneath each row of panels. Furthermore, ancillary equipment should be contained in small cabinets so that roof water is discharged directly onto the surrounding ground. These recommendations have been incorporated into the proposals to ensure that surface water on the site is sufficiently drained.

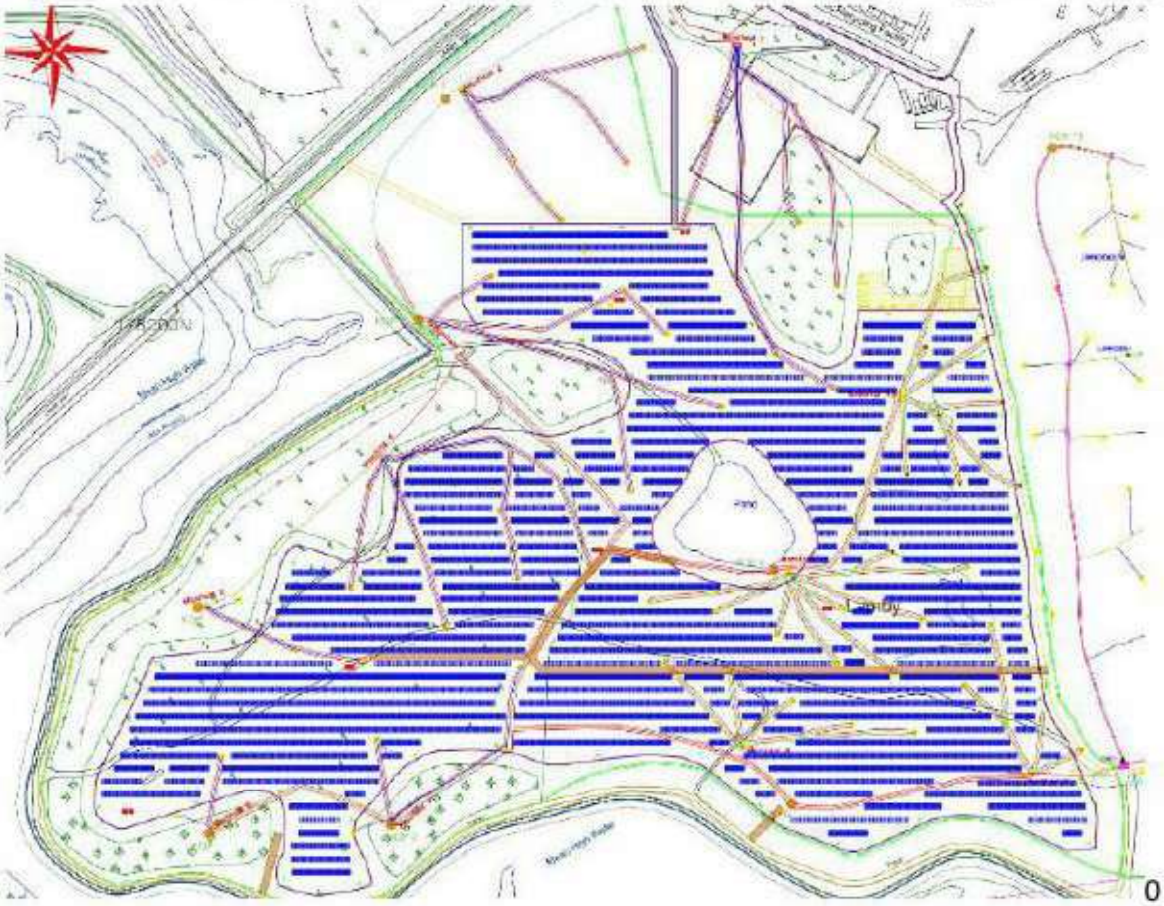
Introduction of additional substation

An additional substation has been incorporated into the proposed design to future proof the development in case of a private wire arrangement with a third party. The proposed substation will be positioned to the south west of the application site. Although the route of any private wire has not been established at this juncture, it was considered best practice to include the additional substation in this formal planning application. For further information in regard to the additional substation, please refer to drawing LAMDWG-002.

Implications of Site Constraints

Due to the factors outlined above, the overall output of the site (as shown on page 16) was significantly reduced from 7.5MW and as a result this had a negative impact on the viability of the whole project. It was essential for the project to increase the renewable energy output which led to the inclusion of land to the north of the original application site outlined figure 1. Expanding the site area to 16.89Ha allows the total renewable energy output to be increased to 8.7MW whilst ensuring the appropriate ecological mitigation, site security and access to the gas infrastructure. Figure 14 illustrates the final site layout of the proposed solar farm.

Figure 14: Final site layout plan of the proposed solar farm at Lamby Way (not to scale)



Please refer to drawings LAM-DWG002 LAM-DWG003 and LAM-DWG006.1 for further details in regard to the final site layout.

5 RESPONSE TO OBJECTIVES OF GOOD DESIGN

5.1 Access and Movement

The Cardiff Household Waste Recycling Centre (HWRC) is served by a dedicated entrance off the Lamby Way/Wentloog Avenue roundabout found at grid ref. ST21977 78309. The access off this roundabout represents the end of the public highway, and beyond this the road into the HWRC is private in nature.

The road serving the HWRC is dual width and constructed in an adoptable manner (see figure 15 below).

A further roundabout is found within the site which forms part of a circulatory system of roads for vehicle movements.

Figure 15: North west facing image (towards the roundabout) of the unnamed road leading to Cardiff HWRC.

The access route continues to the bottom of the Cardiff HWRC until it adjoins a junction leading to an off-road single width track which travels south towards the north east corner of the site.

Figure 16: South east facing image of the unnamed road leading to Cardiff HWRC junction to single width track visible on the right-hand site (denoted by red arrow).

Figure 17: Access to the single width track from the unnamed road

Figure 18: Satellite image illustrating the access track to the proposed site (image courtesy of Google.com)

As shown in figure 17, a junction with a slight incline will adjoin the unnamed road and the track. The existing dirt track initially travels westwards before continuing in a south direction.

This track will provide direct access to the Lamby Way Solar Farm site for all vehicles during construction and for maintenance purposes. The proposed access route will be reinforced with a hardcore base where necessary.

For completeness, the overall access route is denoted by a red arrow on Figure 19 overleaf.

Figure 19: Site access route from Lamby Way (image courtesy of Google.com)

Most equipment will enter the site in HGV trucks, with approximately 50 vehicles expected throughout the construction period. It is estimated that there will be 5 tracks (4 for transformer stations and 1 for customer substations) across the construction site in order to install the solar farm. Please note that not all 50 HGV will be on site at the same time.

In total, the construction period is expected to last 12 weeks. Deliveries to the site will be spaced out over the installation period with a likely maximum of 10 deliveries per day. Larger electrical infrastructure will be lifted into place using 20T cranes which are proposed to be on site for 2 days throughout the installation.

For further information in regards of site access please refer to drawings LAM-DWG002.

5.2 Character

Amount and Layout

The application site is proposed to be utilised for solar panel generation with an output of 8.7MW. The panels will be arranged in arrays on galvanized steel structures supported on mounted ballasted/ concrete pads.

In total, there will be 30,688 individual solar panels positioned in rows across the site projecting the solar panels to be in a south facing orientation to maximise their solar exposure.

The panels would be set back from the boundary with the scrub adjacent to the Rhymney River being retained.

The proposed development also requires a series of containerised and similar structures containing high voltage electrical equipment including inverters, transformers and switchgear. Each will be set on a concrete raft foundation to spread the load across a wider area.

To provide areas of open habitat and safeguard for the potential for a realigned Wales Coastal Path route, a 10m buffer will be retained between any areas of scrub surrounding the site and any means of enclosure. To this end, the site will be enclosed using a 2.2m high security fence constructed from agricultural posts and wire. CCTV camera poles approximately 3 to 4 m high will be positioned in intervals inside the site and in close proximity (2m) to the fence. Panels will be positioned 3m from CCTV cameras and therefore 5m from the fence line. In total, there will be a distance of 15m between any surrounding scrub/ trees and solar panels.

For further information in regard to site layout, please refer to the following drawings LAM-DWG002, LAM-DWG003 and LAM-DWG006.1.

Scale

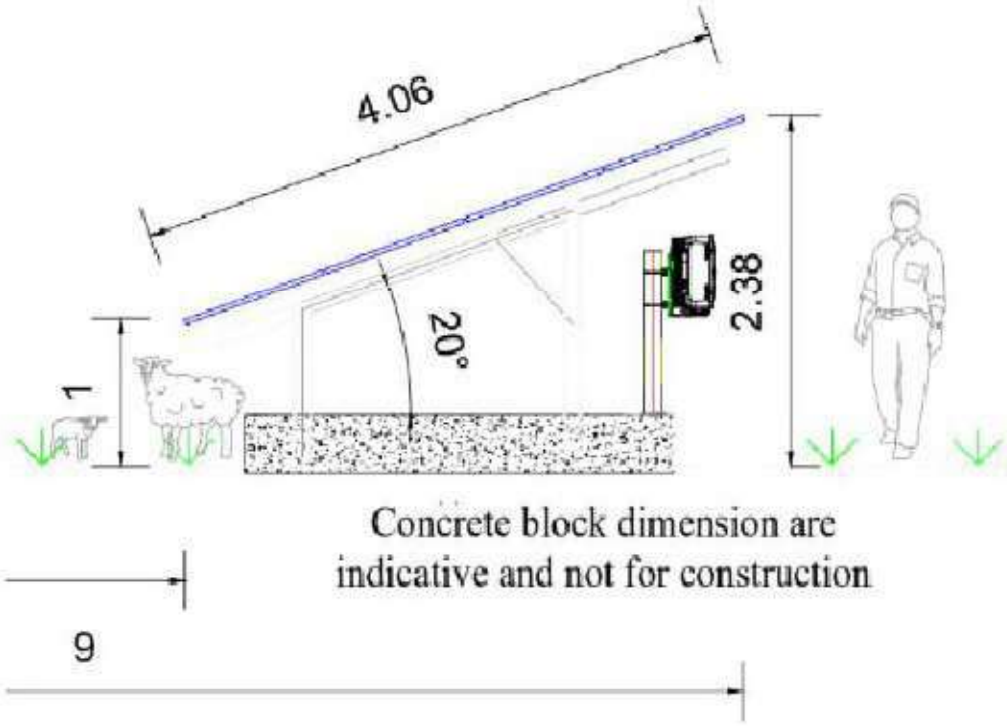
The total area of the site is 16.89 hectares in total. This comprises the solar arrays and ancillary equipment, access route and cable route to substation.

The dimensions of the solar panels will each measure 1m x 1.67m and will be fixed directly to a galvanized steel supporting structure which combined are referred to as arrays.

The arrays will not exceed 2.8m in height and the lower edge of the array will be approximately 750mm above ground level. Due to the uneven nature of the ground

level within the application site an exact height of the lower arrangement cannot be specified.

Figure 20: Side view of proposed solar panels (image not to scale)



For further information in regard to the scale of the solar panels, please refer to the following drawings LAM-DWG004.1 and LAM-DWG004.2.

Appearance

The site is currently a vacant grassland area with various elements of gas infrastructure apparatus present and therefore the installation of a solar farm will change the nature of the site in appearance, albeit temporary for the duration of the planning consent.

The solar panels will be tilted at an angle of 20 to 25 degrees to the ground facing in a southerly direction ensuring that they are facing away from residential areas. The visual appearance of the site will therefore vary depending on the viewpoint.

For further details of the solar panel appearance, please refer to the following drawings LAM-DWG004.1 and LAM-DWG004.2.

Landscaping

It is considered that the existing landscape will allow for robust containment of the proposed development such that no further planning by way of mitigation is required.

Furthermore, any existing vegetation within the application site will be retained and allowed to recover after construction has been completed.

Please refer to the submitted Landscape and Visual Impact Assessment for additional details in regard to necessary landscape mitigation.

5.3 Environmental Sustainability

As stated Technical Advice Note 12, the objectives that developers need to respond to in respect of Environmental Sustainability include that of achieving efficient use and protection of natural resources, enhancing biodiversity and designing for change.

The proposals enable the site to be utilised for renewable energy creation on a temporary basis. The development therefore does not represent an irreversible impact on the land. At the end of the life span of the energy generation it is also likely that necessary site remediation will have concluded.

There is a natural buffer of vegetation to the north east and east between the application site and the Rhymney River which will be retained. Tree planting around the site provides screening from the majority of the surrounding area to the north and east, although some areas are elevated. The views from the north are controlled by vegetation along Lamby Way and the household waste recycling plant. In addition, vegetation along the Rhymney River softens views from the west as does the embankment immediately south of Rover Way. Beyond this existing built development within east Cardiff screens any potential views from the west.

5.4 Community Safety

The construction of the development should have no impact on the community's safety as it is taking place on land owned by Cardiff Council. To provide extra assurance, the installation of a perimeter fence and CCTV serve a dual purpose of protecting the solar farm equipment from wildlife interference and keeping nearby communities at a safe distance.

6 CONCLUSION

Wardell Armstrong LLP has been instructed by Cardiff Council (the applicant) to prepare a planning application for the construction of a solar farm on land south of Lamby Way partly comprising of the former Lamby Way Landfill Site. The proposals entail the installation of ground-mounted photo-voltaic solar panels and ancillary equipment with a maximum output of 8.7MW.

The proposed development is supported in principle by national and local planning policy in that there is a presumption in favour of sustainable development and that there is a need to encourage renewable energy generation across the nation.

Overall, the acceptability of the proposed development is emphasised by Technical Advice Note 8 which states that:

"Other than in circumstances where visual impact is critically damaging to a listed building, ancient monument or a conservation area vista, proposals for appropriately deigned for solar thermal and PV systems."

Taking all the above into consideration, it is contended that there are no material considerations of sufficient merit or weight to resist the accompanying planning application for the proposed development and therefore it should be approved.

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