



# PLANNING SUPPORTING STATEMENT

on behalf of Alfred G Pearce Ltd.

Erection of solar installation

Middle Farm, Wormegay.

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For and on behalf of Brown & Co.

*Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.*

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Reference: 22/042910

## INTRODUCTION

**1.1** This statement has been prepared by Brown & Co to support an application for full planning permission submitted on behalf of Alfred G Pearce Ltd for the erection of a solar installation at Middle Farm, Wormegay.

**1.2** Middle Farm is a vegetable processing plant located close to the centre of Wormegay. The plant is operated by Alfred G Pearce Limited, who have occupied the site for more than 25 years. Alfred G Pearce is a family-run business supplying the food industry with processed vegetables. Around 50 people are employed at the Middle Farm plant typically, although this figure can increase to around 80 people at peak times, such as the Christmas period

**1.3** The purpose of this statement is to set out the background to the applicants' proposals and the key planning issues raised by them. The statement is structured as follows:

- **Section 1:** introduction
- **Section 2:** describes the physical characteristics of the site and its surroundings;
- **Section 3:** outlines the proposed development;
- **Section 4:** summarises pre-application consultations;
- **Section 5:** outlines relevant national and local planning policy context;
- **Section 6:** provides a planning assessment of the key considerations raised by the proposal; and

- **Section 7:** sets out in brief our overall conclusions on the proposal.

**1.4** The purpose of this statement is to set out the background to the applicant's proposals and the key planning issues raised by them. This statement should be read in conjunction with the following documents:

- Site Location Plan - Dwg no. 22-042910-001
- Proposed Site Plan - Dwg no. 22-042910-003
- Proposed solar panels - Dwg no. 22-042910-004
- LONGi Solar Panel Datasheet
- Solarport Ground Mount Technical Datasheet.

## APPLICATION SITE

**2.1** The vegetable processing plant operated by A G Pearce Ltd occupies around 1.3 hectares of land on the southern edge of the Wormegay. Existing buildings include the main processing plant, offices, staff facilities, workshop/stores and a cold store. Access to the unit is gained from Castle Road. The facility is bound to the north by residential development and to the south and west by open countryside.

**2.2** The proposal site comprises a largely rectangular parcel of farmland immediately to the west of the main yard of the vegetable processing plant. The site is presently unused, not having been used for agricultural production for a number of years.

**2.3** The site is bounded to the south and west by open fields and to the north by the site of the former Wormegay Castle, which is a scheduled monument. The nearest residential properties on Castle Street are located some 50 metres to the north-east.



Figure 1 - Aerial view [Source: Google Maps]



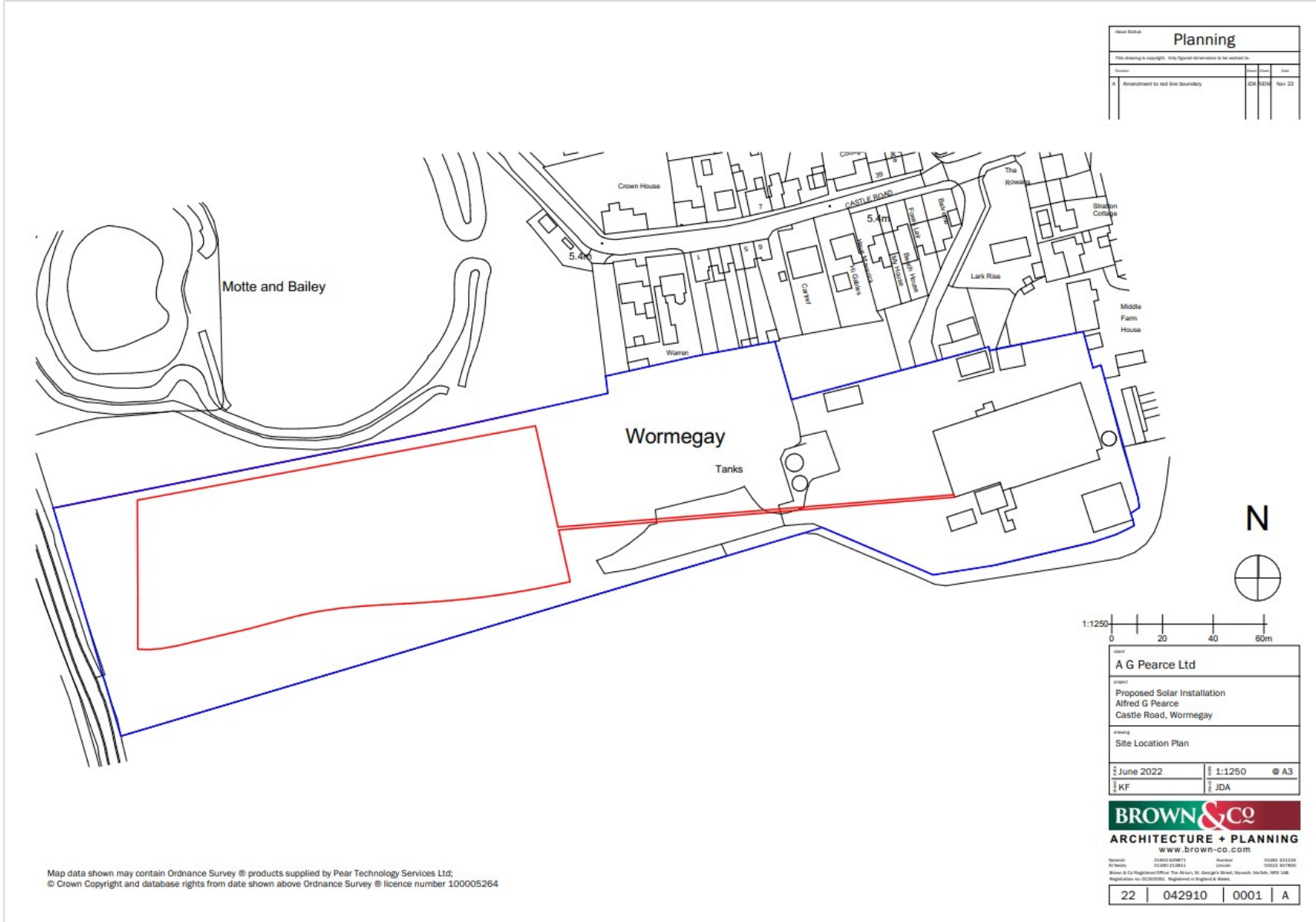


Figure 2 - site location plan

## PROPOSED DEVELOPMENT

**3.1** It is proposed to install a 725kW solar array on the field immediately west of the vegetable processing plant to generate power for the plant. The solar panels would be ground-mounted, secured to metal posts drilled into the ground, and oriented to face directly southwards.

**3.2** It is proposed to install five rows of panels over circa. 6,000 square metres of the field in order to provide an estimated 690,925kWh of energy per annum. The rows would vary in length, tapering towards the western boundary, so as to reflect the position of the existing scattered trees within the site.

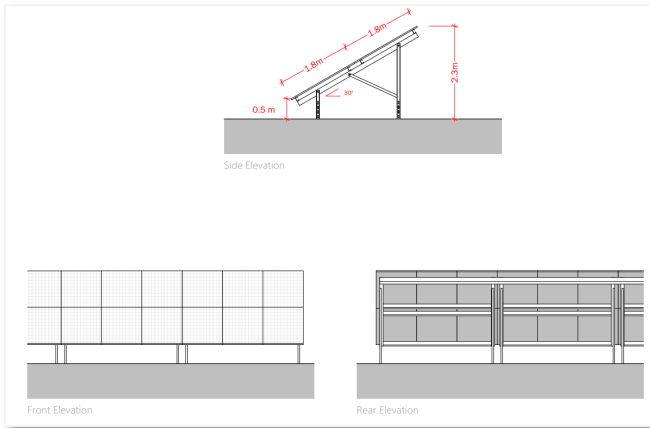


Figure 2 - Proposed Solar Panels

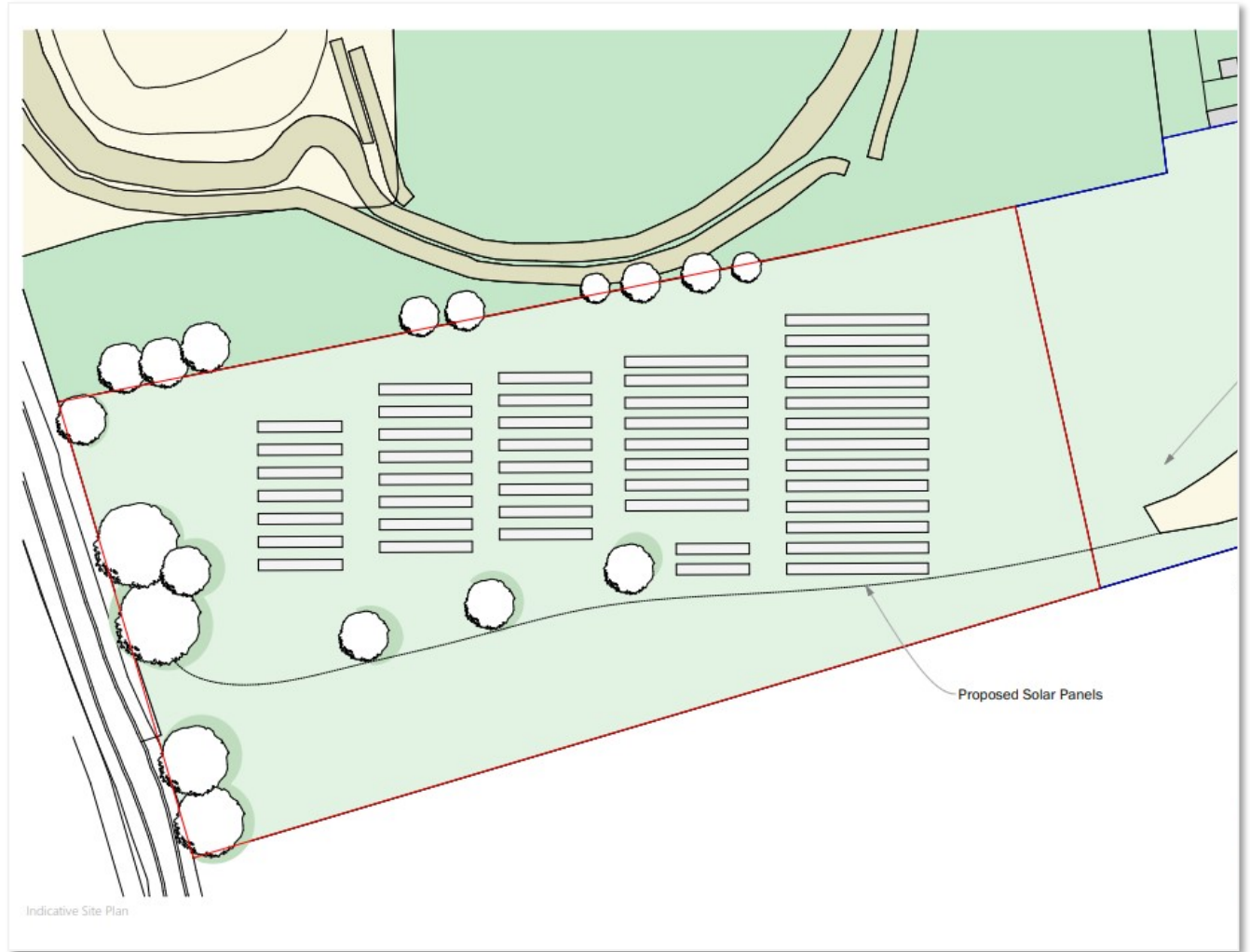


Figure 3 - Proposed Site Plan

## CONSULTATIONS

**4.1** In June 2022, pre-application enquiries were submitted to the Borough Council and to Historic England concerning the proposed solar installation.

**4.2** Historic England responded in July 2022 indicating that it would object to a planning application on heritage grounds. This was because it was considered that the proposal would adversely affect the setting of the adjacent ancient monument by intruding into views of and from the former castle site. Concerns were also raised about potential disturbance to buried archaeology.

**4.3** At the time of writing in November 2022, a response had not been received from the Borough Council.

## PLANNING POLICY

### Development plan

**5.1** In the Borough of Kings Lynn & West Norfolk, the development plan comprises the:

- Local Development Framework – Core Strategy (adopted 2011) (the Core Strategy); and the
- Site Allocations & Development Management Policies Plan (adopted 2016) (the SADMP Plan).

**5.2** National planning policy, as set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance, is also a material consideration.

**5.3** Development Plan policies of relevance to this enquiry include:

- Core Strategy Policy CS01 *Spatial Strategy*
- Core Strategy Policy CS06 *Rural Areas*
- Core Strategy Policy CS08 *Sustainable Development*
- Core Strategy Policy CS10 *The Economy*
- Core Strategy Policy CS12 *Environmental Assets*
- SADMP Policy DM1 *Presumption in favour of sustainable development*
- SADMP Policy DM2 *Development Boundaries*
- SADMP Policy DM15 *Design, Environment and Amenity*
- SADMP Policy DM20 *Renewable Energy*

### Emerging policy

**5.4** The Council has prepared a Local Plan Review to cover the period between 2016 and 2036. The draft plan is currently being examined by Government inspectors. For the purposes of this proposal, the draft policies are broadly the same as existing.

### National policy

**5.5** The NPPF sets out the Government's planning policies, and advises that the purpose of the planning system is to contribute to the achievement of sustainable development. Three objectives of sustainable development are identified: economic, social and environmental.

**5.6** Economic considerations include ensuring that sufficient land of the right type is available in the right places and at the right time to support growth. Social considerations include supporting healthy communities by creating high quality environments with accessible local services. Environmental considerations include protecting and enhancing the natural, built and historic environments, as well as adapting to climate change, including moving to a low carbon economy.

**5.7** To help increase the use and supply of renewable and low carbon energy, the NPPF says that planning policies should adopt a positive strategy for renewable energy that maximises the

potential for suitable development. For decision making purposes, the NPPF goes on to indicate that local planning authorities should recognise that even small scale projects provide a valuable contribution to cutting greenhouse gases, and should approve applications if their impacts are (or can be made) acceptable.

**5.8** Other relevant policies in the NPPF relate to the following:

- making effective use of land;
- protect and conserve the natural environment; and
- protecting and conserve the historic environment.

**5.9** National Planning Practice Guidance provides further more detailed advice on renewable energy projects. In relation to ground-mounted solar installations, it notes whilst large scale proposals can have a negative effect on the rural environment, visual impacts can be properly addressed if they proposals are well planned and screened. Guidance also encourages the use of brownfield land and for greenfield sites, the use of lower quality agricultural land.

## Principle of development

**6.1** Local Plan Policy CS08 states that the Council will support and encourage the generation of energy from renewable sources, and that such schemes will be permitted unless there are unacceptable locational or other impacts.

**6.2** Local Plan Policy DM20 sets out the matters to be considered when determining individual or cumulative impacts, including:

- local landscape character;
- designated heritage assets and their settings; and
- amenity.

**6.3** For the reasons as discussed below, it is not considered that the proposed development would overall result in unacceptable impacts upon the local landscape, adjacent heritage asset or neighbour amenity, when these are balanced against the renewable energy benefits. Accordingly, the proposal would comply with the provisions of local and national planning policies.

## Need for development

**6.4** The proposed development would support the energy requirements of the vegetable processing plant, helping to reduce demand on the national grid, and embed climate resilience into the business. The proposed panels would allow the plant to meet a significant amount of its energy

needs through renewable sources, equating to annual carbon savings of 3,403 tonnes.

**6.5** Currently, during the daytime (0800-1900 hours), the vegetable processing plant consumes around 1,175,958 KWh of electricity per annum. It is estimated that the proposal solar installation would generate 690,925 KWh per annum, which equates to 59% of the processing plant's energy uses. All energy generated by the solar installation would be used by the plant, with none being exported to the electricity grid. Further details are set out in Appendix 1 of this statement.

**6.6** Consideration has been given to alternative energy solutions, including scaling back the proposals and/or utilising the roofs of existing buildings. However, reducing the scale of the installation is not considered viable given the power demands of the processing plant and the capital costs of the installation. Use of the existing buildings has been discounted as:

- the roofspace is not large enough;
- roof pitches are too low for optimum solar gains; and
- the roofs are not strong enough to support the additional weight.

**6.7** As well as significantly reducing the carbon footprint of the business, the cost savings to the business would support its continued viability and help to secure the employment provided.



## Local character

**6.8** Although the land proposed for development falls outside the development boundary for Wormegay, as defined in the Local Plan, it is closely related to the existing built up area of the village and effectively forms part of an established commercial premises. The proposal would not therefore result in an isolated development in the countryside.

**6.9** NPPF paragraph 170 indicates that planning decisions should recognise the intrinsic character and beauty of the countryside. Consistent with this, Core Strategy Policy CS12 indicates that all new development to be sympathetic to the landscape character of its surroundings. Careful consideration has been given therefore to the likely effects of the development on its surroundings.

**6.10** The application site falls within the E2 Saddlebow and Wormegay Open Island Marshes Landscape Character Area, as defined in the Council's Landscape Character Assessment (LCA). Key characteristics of this landscape type include its large scale, open vistas, strong geometric patterns, Development management guidelines include conserving rural character, open views and tranquillity.

**6.11** In terms of landscape character, the proposal would introduce new elements into the landscape in

the form of the proposed solar panels and supporting posts, which would have an urbanising effect. However, the land affected would not be large, no permanent buildings are proposed and the panels would sit lightly on the land. Existing landscape features such as established trees would be retained. Consequently, effects on landscape character would be minor.

**6.12** The proposed development would not generally be visible from nearby public viewpoints, being screened from Castle Road by the adjacent scheduled monument and existing housing. There are limited public viewpoints to the south of the site. Views across the nearby fields would be experienced in the context of the adjacent processing plant and main form of Wormegay. Long range views of the site from the south would be prevented by the large woodland blocks located a short distance from the site.

**6.13** When seen in private views across open fields to the south, the proposed development would be seen against the backdrop of existing buildings and as a minor element in the existing complex of commercial buildings. As a result, the scheme would have only a minimal impact on the rural setting of the village.

**6.14** The nature of the development is such that the panels would not occupy a significantly elevated position, and so would not become

prominent or dominant within the landscape. Existing landscaping within the site would help to screen the panels, whilst the retained grassland between the panels would help them to assimilate with the wider rural setting.

**6.15** For these reasons, it is considered that the proposal would be compatible in scale with its surroundings and would not result in unacceptable effects on the character and appearance of the application site, or the wider rural landscape. The proposal would thus accord with local and national planning policies.

## Heritage impacts

**6.16** The application site is located immediately adjacent to a scheduled ancient monument encompassing the earthworks associated with a former 11th century Norman motte and bailey castle (list entry number 1018651).

**6.17** The proposed development would introduce a solar array to the south of the scheduled monument. The panels would be orientated to face southwards in order to maximise solar gain, and therefore away from the monument site. As such it is considered that the proposed panels would not appear prominent or dominant within views of the monument on approaching from the north, east or west.

**6.18** Indeed, the nature of the monument is such that it would screen the application site from wider views. There are no public vantage points from the south within which clear views of the proposed panels and adjacent heritage asset would be visible.

**6.19** Existing trees within the site, and to the site boundaries would be retained, providing filtered screening from the adjacent heritage asset. If required then further planting could be provided to the northern boundary in order to screen the proposed solar array.

**6.20** The potential for underground archaeological remains in the vicinity of the monument is considered high. It is proposed for the solar panels to be ground mounted, with mounting poles drilled directly into the ground. No foundations or other excavations would be required in connection with the mounting of the panels. A narrow cable trench would be required from the eastern end of the solar array to link with the main plant processing plant. Archaeological investigations could be undertaken prior to the development taking place. As such it is considered that the proposed development would not result in harm to the significance of buried artefacts.

**6.21** For these reasons, it is considered that the proposed development would not result in significant harm to the setting or significance of the

Wormegay motte and bailey castle scheduled ancient monument.

### Amenity

**6.22** Careful consideration has been given to potential impacts on the amenities of local residents.

**6.23** The proposed solar panels would be located away from neighbouring properties and their rear gardens. Intervening vegetation, and outbuildings associated with the neighbouring dwellings would largely screen the proposed development from the view of residents.

**6.22** The panels would be orientated so as to face southwards, and so it is not anticipated that there would be impacts upon neighbours as a result of glint, glare or reflections.

**6.23** As such, the proposal would have little visual impact on neighbouring properties. Furthermore, as set out above, additional planting could be introduced to the site boundaries so as to further screen the site as a result,

**7.1** It is proposed to install a solar array on land to the west of the applicant's vegetable processing plant at Wormegay. The solar panels would help to address the energy needs of the unit, thereby reducing the associated carbon footprint and demand on the national grid.

**7.2** The panels would be positioned so as to minimise impacts upon the amenity of neighbouring dwellings and the wider landscape. The nature of the adjacent scheduled monument is such that it would largely screen the proposed development. The panels would be orientated to face away from the monument, therefore preventing impacts from glare and reflections. The ground mounted nature of the panels would minimise potential adverse impacts upon any buried items of archaeological interest.

**7.3** For the reasons set out above, it is considered that the proposed development would not result in any significant individual or cumulative adverse impacts upon neighbour amenity, local landscape character, or heritage assets. Any impacts resulting would be outweighed by the benefits of the scheme in terms of renewable energy generation and climate resilience. On this basis it is considered that the proposal would accord with local and national planning policies.

## APPENDIX 1 - FORECAST MONTHLY SOLAR PV GENERATION PLOTTED AGAINST CURRENT ELECTRICITY USAGE

Current Usage Derived from:	Client Estimation													
Solar Photovoltaic System Size	725	KWp												
Estimated Solar Photovoltaic Generation	690,925	KWh												
Est Solar Photovoltaic Generation Exported	0%	KWh												
<b>Monthly Current Daylight Electricity Usage</b>														
	Total	January	February	March	April	May	June	July	August	September	October	November	December	
<b>Estimated electricity purchased from the grid between 8:00am and 7:00pm per Month</b>														
Current Electricity Daylight Hours - KWh	1,175,958	90,477	85,619	91,725	98,574	98,092	98,302	114,919	102,943	107,175	102,784	93,951	91,397	
<b>Solar Photovoltaic Generation</b>														
Solar Photovoltaic Generation - KWh	690,925	13,819	20,728	48,365	76,002	89,820	96,730	110,548	76,002	76,002	48,365	20,728	13,819	
<b>New Situation</b>														
On Site Solar Usage	690,925	13,819	20,728	48,365	76,002	89,820	96,730	110,548	76,002	76,002	48,365	20,728	13,819	
Grid Purchased Electricity	485,033	76,658	64,892	43,360	22,572	8,272	1,573	4,371	26,942	31,173	54,419	73,223	77,578	
Solar Export	-	-	-	-	-	-	-	-	-	-	-	-	-	
Solar Generation Vs On Site Day Usage Demand	59%	15%	24%	53%	77%	92%	98%	96%	74%	71%	47%	22%	15%	
<b>Monthly Analysis</b>														
On Site Solar Usage	59%	15%	24%	53%	77%	92%	98%	96%	74%	71%	47%	22%	15%	
Grid Purchased Electricity	41%	85%	76%	47%	23%	8%	2%	4%	26%	29%	53%	78%	85%	
Solar Exported % of Solar Generation	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
On Site Solar Usage	100%													

