



URBANA
TOWN PLANNING

Planning Statement

Burston PV, Diss



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Client: Zestec Asset Management
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INSTALLATION OF SOLAR PV SYSTEMS ON THE LAND TO THE REAR OF BURSTON MILL

Planning Statement

1.0 Introduction

- 1.1 The following statement has been prepared by Urbana on behalf of Zestec Asset Management to assist with the submission of a full application for the proposals noted above.
- 1.2 The statement describes the application site and its physical and planning context, alongside the proposals and the application process, before assessing them against relevant planning policy, both national and local.



2.0 Site & Location

- 2.1 The development is proposed on the land to the east of the Burston Mill which is used for the operations of For Farmers UK Ltd. The site sits in proximity of Bridge Rd, which passes to the immediate North of the site and the main access is from Mill Rd which runs alongside the West of the site. The A140 is approximately 1.94 miles away from the site, providing easy linkages into Norwich City Centre and existing larger settlements.
- 2.2 The Site is located within a rural setting, approximately 0.625km north of the Burston settlement area. The broader area is predominately rural in character consisting of arable fields, with the



proposed site being designated as countryside land with no policy designations within the South Norfolk Local Plan (SNLP) Policies Map. The proposed development land has a gross area of approximately 1.98 Ha (4.89 acres).

3.0 Relevant Planning History

3.1 The proposed site does not have any historic planning applications; however, it is currently under the same ownership as the Burston Mill, which sits adjacent to the proposed development land. A brief history of relevant planning applications for Burston Mill is listed:

- **1993/0504**- Extension to staff car park. **Approved with Conditions.**
- **1994/1019**- Erection of covered driveway. **Approved with Conditions.**
- **2006/1989**- Request for screening opinion as to whether EIA is required for extension to production facility at Burston Mill. **EIA not required.**
- **2006/2216**- Demolition of existing building and construction of warehouse extension, additional production plant and replacement silo. **Approved with Conditions.**

4.0 Proposal

4.0 The proposals for development include the Installation of a ground mounted PV System on the rear land of Burston Mill (For Farmers UK Ltd).

4.1 The proposed size and energy capacity for this scheme is 1,199.00 kWp and this system will take up an approximate space of approximately 2.06 Hectares. A 2m tall fence will run around the perimeter of the PV system and will be partially obscured by new planting along the northern boundary of the fence to soften the impact of the proposal where it interacts with the public right of way (PROW) which runs to the north of the development site.

4.2 A temporary site road runs centrally through the site from north to south with a smaller off shoot running from the existing pavilion to the west of the site. Both an LV PVDB and a Spares Container are located to the north west of the site – full elevational details of these are submitted which evidence that both containers will be 2.90m x 6.06m x 2.44m wide.

4.3 To minimise cable runs, trenching works and security fencing the design keeps the solar array all together in one place. As such the final design has all of the solar panels sitting to the south of the footpath keeping the impact on the site as minimal as possible. This layout also sees the array kept as far from nearby residential properties as possible, again minimising any negative impact that could be perceived.



5.0 Pre-application enquiry

- 5.1 The applicant submitted a pre-application enquiry (ENQME/2022/0659) to ascertain where the LPA's potential areas of concern may be to enable the applicant to address them to the satisfaction of the Planning Authority through the full application.
- 5.2 The pre-application response received noted that there were no issues with the principle of development and that, subject to full details being provided through the full application, the design and appearance of the proposed solar panels in their own right would be acceptable with any identified constraints unlikely to be insurmountable.
- 5.3 In terms of impact upon the neighbouring dwelling's amenity, the pre-application response considered that there would not be any harm to the amenity of neighbouring properties given the passive nature of solar panels and the anticipated frequency of maintenance activities, however the response also highlighted that there would be the potential for neighbouring properties to be sensitive visual receptors which would need to be investigated and addressed as part of the LVIA. Accordingly, the applicant is submitting a full LVIA to deal with this accordingly, as well as a Glint and Glare assessment.
- 5.4 The pre-application advice ultimately summarised that whilst it was not possible to conclude whether the development would be acceptable when assessed against the Development Plan as a whole based off the level of information submitted, it was not anticipated that there would be any insurmountable issues to overcome, as many of the potential impacts could be addressed through the submission of supporting information, or the application of sensitive design and landscaping. Drawing on the main element of potential concern, the LPA advised that comfort would need to be provided that the solar array would not lead to the erosion of the existing tree belts to maximise solar gain.

6.0 Planning Policy Assessment

- 6.1 In determining the application, the most relevant planning policy documents include the following:
- 6.2 The NPPF states that at the heart of the document is a presumption in favour of sustainable development which is a fundamental consideration in the process of both plan-making and decision-taking. Sustainable development is defined by three core dimensions: economic, social and environmental. It is established that: "For decision taking this means approving development proposals that accord with the development plan without delay."
- 6.3 Part 14 of the NPPF is directly relevant to renewable energy generation. Paragraph 152 states that in order to increase the use of renewable and low carbon energy generation: 'The planning system should support the transition to a low carbon future in a changing climate and should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions whilst also supporting renewable and low carbon energy and associated infrastructure'. Paragraph 158 goes on to state that when LPAs determine planning applications for renewable and low-carbon



development, they should; “not require applicants to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions’ 158 (b) asks for applications to be approved if the impacts are (or can be made) acceptable.” It is considered that the potential impacts of the proposed development are, or can be made acceptable in this specific location, given the careful site selection which provides natural screening from nearby dwellings and highways, as well as through the proposed mitigation measures.

7.0 Accordance with Local Planning Policy

7.1 In the following section it will be demonstrated that the proposal is acceptable and should be viewed favourably by the LPA.

7.2 The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk, adopted March 2011 (amended 2014) ‘sets out the long-term vision and objectives for the area’ through a number of policies upon which we have assessed this proposal.

7.3 Policy 1 seeks to address climate change and protect environmental assets by encouraging development that is energy efficient. If approved, this proposal will not only minimise the applicant’s existing contribution to climate change, but also provide scope to further reduce South Norfolk’s overall demand on the grid.

7.4 Paragraph 5.1 asks that national and regional policy place considerable emphasis on the need to minimise emissions and respond to the effects of climate change.

7.5 Policy 3 aims to minimise reliance on non-renewable high-carbon energy sources and maximise the use of decentralised and renewable or low-carbon energy sources.

7.6 South Norfolk’s Local Plan promotes a series of Development Management Policies to determine how the Council carries out its development management responsibilities in supporting sustainable development and how it will determine planning applications.

7.7 The following SNLP Development Management Policies are considered applicable to the proposed development:

- Policy DM 1.1 Ensuring development management contributes to achieving sustainable development in South Norfolk.
- Policy DM 2.1 Employment and business development
- Policy DM 2.7 Agricultural and forestry development
- Policy DM 2.8 Equestrian and other changes of agricultural land
- Policy DM 3.14 Pollution, health and safety
- Policy DM 4.1 Renewable Energy



- 7.8 Development Management Policy DM 4.1 of is of particular importance to the acceptance of this proposal, with it supporting renewable energy generating development. The policy explains that proposals requiring planning permission other than for proposals for wind energy development will be supported and considered (taking account of the impact of relevant ancillary equipment) in the context of sustainable development and climate change on the wider environmental, social and economic benefits of maximising use of renewable energy.
- 7.9 The Diss and District Neighbourhood plan outlines policies shaped by the local community and these policies are used to decide whether planning applications are approved or not, alongside the adopted policies of South Norfolk Council and Mid-Suffolk Council.
- 7.10 The Diss and District Neighbourhood Plan registers one non-designated heritage asset and a number of listed buildings within the settlement of Burston & Shimpling. It is noted that the non-designated heritage asset of 'School & Old School House' and the listed buildings are all outside of the immediate proximity of the proposed development site, with the location of these buildings, being within Burston village (approximately 0.6 mile away from the site).
- 7.11 The Diss and District Neighbourhood Plan registers a number of Key Views which are protected under Policy 13 of the DDNP. Policy 13 states 'development proposals that would adversely affect these key views will not be supported. Proposals are expected to demonstrate that they are sited and designed to be of a form and scale that avoids or mitigates any harm to the key views'. There are three key views designated in the DDNP and these include: views towards St George's Church, views all around from Market Lane, views towards the village from Back Lane. It is believed that although Key View 7 of the DDNP is located 500m away from the proposed development site, the hedgerow on Back Lane provides natural screening that interrupts any views of the site.
- 7.12 The Diss and District Neighbourhood Plan identifies several Green Corridors that run through the settlement of Burston & Shimpling. Policy 5 of the DDNP states 'The management, enhancement, and creation of wildlife habitats within the 13 green corridors identified is a key priority. These will be a focal point for local conservation to create a more joined up Green Infrastructure Network and where possible increased public access, helping people to experience wildlife first-hand... Proposals for new development within or adjacent to a green corridor will be resisted unless they are able to demonstrate how they deliver appropriate net gains in biodiversity or qualitative improvement to the corridor. This should relate to quality of habitat or its ability to facilitate movement of fauna or flora'.
- 7.13 The Green Corridor identified as being within closest proximity of the proposed development site passes 2Km to the South of the development site, to the North of Burston Village. Therefore, it is regarded that there isn't a Green Corridor that intersects or is within a close proximity of the land to the rear of Burston Mill. The overall impact of the proposed development on local ecology is demonstrated in full through the submission of a full suite of supporting ecological reports in conjunction with the advice received through the pre-application advice. The findings and recommendations of these surveys and reports will be summarised and discussed later in this statement.



8.0 Economic and Social Considerations

- 8.1 Beginning with the social benefits of the scheme, the most substantial of these is undoubtedly the stimulation of economic activity in the locale through the employment of local contractors and the attraction of specialist contractors to the area. This workforce will spend time and money in the area during the installation of the PV system. This will benefit the local economy by boosting sales of nearby food vendors that serve the existing workforce of the area, providing the associated social and economic benefits for the duration of the scheme's installation period. Furthermore, local contractors will be used for the ongoing maintenance and repair service of the solar panel farm, which will generate long term jobs within the locality and create a more prosperous local economy.
- 8.2 On a localised scale, the social impact of this scheme deserves to be recognised at this stage of planning. Naturally, the activities of For Farmers UK Ltd contribute to the release of greenhouse gases through the operation of their factory. For Farmers UK Ltd has two core activities which encompasses the majority of their business operation. These activities are predominately the production and transportation of animal feed, which are two carbon intensive activities. The UN's Food and Agriculture Organization estimates that feed production represents 45% of the carbon footprint of livestock products globally and although the scheme is miniscule in scale from a national perspective, the proposal represents an important commitment from one of the largest manufacturing plants in the local area towards offsetting its commercial carbon footprint through the production of clean, renewable energy. This will power For Farmers UK Ltd's operations and increase the share of renewable energy in the national grid.
- 8.3 It is a universally accepted fact that the climate crisis affects the poorest in society, again, both nationally and internationally, most severely on account of this section of society's lack of financial resilience against a reduction in the predictability of weather patterns and devastating extreme weather events. Therefore, a proposal such as this, which will solely aim at increasing the availability of green energy and moves us further forward as a nation towards net-sustainability in the process, should be viewed in an extremely favourable light from the LPA.
- 8.4 The production of renewable energy that is fed into the National Grid is essential as the cost-of-living crisis continues to escalate in the UK. The crisis has escalated to the extent that the UK Government have been forced to intervene in overhauling the price cap mechanism for a period of 6 months due to the spiralling costs of electricity and gas. It is estimated that 7 million households in the UK will suffer from fuel poverty in the 2022-2023 winter period and therefore a proposal which feeds cheap, renewable sources of energy into the national grid should be viewed favourably from the LPA. It will act as a step towards moving Britain to net-sustainability and reduces the UK's over reliance on sources of non-renewable energy.
- 8.5 Paragraph 81 of the NPPF emphasises the need for planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local



business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential. Specifically, to the rural economy, Paragraph 84 requires LPAs to support a prosperous rural economy, whereby Local Plans enable an environment that development and diversification of agricultural and other land-based rural businesses is supported.

- 8.6 Farming diversification can result in a more productive use of a segment of a farm estate and can provide a consistent source of income to the farm as a balance to the traditional fluctuations in farming income, which can then be reinvested in farming activities. Diversification into renewable energy will increase farm income security, making farm owners less vulnerable to agricultural subsidy cuts and commodity price fluctuations. Furthermore, it can help to preserve farming tradition by removing the incentive to sell parcels of land in order to maintain income.
- 8.7 It is understood that the site, specifically the footpath which dissects the site, is used by the public as a walking route. Regardless of the end layout and location of the PV system, this proposal will retain this footpath and ensure it is protected for continued and future use.

9.0 Environmental

- 9.1 This proposal to install a PV system on the rear land of Burston Mill should be recognised as a development explicitly intended to reduce the carbon impact of the For Farmers UK Ltd production facility and to increase the percentage of renewable energy in the national grid. The justification of this proposal rests heavily on the simple proposition that installing a PV system will have a significant positive environmental impact, and that planning decisions should always be taken in favour of applications which offer such an undeniable environmental benefit without any discernible negative impact on social amenity. Planning policy at both a local and national level is explicit in the support LPAs should show for proposals aimed at boosting energy sustainability.
- 9.2 Given the size of the system proposed, it is anticipated that a great deal of this energy will be diverted into to the National Grid. Naturally, this reduces the burden of reliance on polluting means of energy generation used to reliably meet the nation's energy needs on a day-to-day basis, edging the UK further towards energy sustainability and net zero emissions which the Government has, by law, committed to achieving by 2050. The continued and increased deployment of privately owned PV systems to harness solar energy – both to reduce the burden on the grid and to feed excess, clean energy back into the grid – will be a crucial tool used in order to achieve this goal. This is evidenced by the government's offer of financial incentives which have been offered at various times to individuals and companies to install PV systems – namely, the Smart Export Guarantee (SEG), Feed-in Tariff (FIT) (now no longer available to new applications) and the reduced VAT on Energy-Saving Products. The entire purpose of this proposal directly aligns with this national policy goal and the production of a significant amount



of clean, renewable energy on a daily basis will help the Government to meet emissions targets set at a national and an international level.

- 9.3 As part of the Full Application process, a Landscape and Visual Impact Assessment (LVIA) has been undertaken and is submitted alongside this application and will be available for local residents to view as part of a consultation process. The proposed site is not located within, adjacent to or in close proximity to any landscape designations or any areas or features of high landscape or scenic value. The siting of the proposal to the south of the Public Right of Way (PROW) means that the landscape effects arising from the proposed development are considered to be entirely limited to the site itself and the immediate setting due to the site being well screened from neighbouring properties and nearby public highways. Visual effects are considered to be relatively localised, with visibility of the site being unapparent from the public highways at Bridge Road and Mill Road. It is recognised that the only public viewpoints of the solar farm will be from the public right of way that bisects through the site and any visual harm caused by the solar farm will be mitigated by screening measures.
- 9.4 There is recognition that there are several residential properties within the vicinity of the site, however it is considered that because of the natural screening from existing trees and hedgerows, that the site is already relatively well screened from neighbouring properties and therefore the residential visual amenity from neighbouring dwellings will be limited. In the medium to long-term, the management of other existing field boundaries along the western site boundary would help to screen the large majority of the proposed development from most near views from the bisecting PROW.
- 9.5 In terms of ecology, a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) were undertaken in January 2023 to ascertain the current value of the site and surroundings from an ecological perspective. In terms of designated sites and habitats and flora, the report recommends that best practice measures are followed during construction to minimise potential impacts, however no evidence was found that would necessitate any more intensive recommendations. Most impactfully, the surveying work identified that some risk to Great Crested Newts (GCN) was possible as a result of the development. Specifically, the development will result in the loss of 0.073ha of modified grassland for the construction of the solar development which could result in the death or injury of GCN if present.
- 9.6 To establish whether GCN are present within the pond 15m south of the site, it was recommended within the PEA that environmental DNA (eDNA) testing should be carried out for any pond within 100m of the site. These surveys must be undertaken between mid April and June. Accordingly, the applicant has commissioned this work and will submit the results latterly to establish the extent of the mitigation measures that will need to be implemented.
- 9.7 Aside from the above-described ecological considerations that have been considered and mitigated against as a result of the extensive survey work which is submitted as part of this application, it remains an important consideration that ground mounted PV systems represent a non-invasive form of development as they do not result in any permanent land use change. The arable land that the solar panels are sited on therefore has the ability to be easily reinstated



following any future decision taken to decommission the solar farm. Therefore, it is regarded that the proposed development is limited in the impact and harm that it poses to the long term biodiversity and quality of what could still become arable land after this development in instated if priorities shifted in this direction.

- 9.8 This analysis demonstrates at a high level that the development scheme fulfils the underlying sustainable development requirements in terms of its economic, social and environmental sustainability. It is considered that proposals here will have an entirely positive impact. It is evident that the proposals represent sustainable development and is therefore compliant with local and national planning policy.

10.0 Principle of Development

- 10.1 As already established, one of the most important factors is that the site and proposals represent sustainable development in all three of the elements as defined by the NPPF. This helps to demonstrate that the proposals represent suitable development and that the benefits of this from a social, economic and environmental perspective are significant. The following paragraphs draw out particularly relevant national and local planning policy as a means of evidencing the acceptability of this proposal.

- 10.2 Paragraph 153 of the NPPF states that local planning authorities should adopt proactive strategies to mitigating and adapting to climate change, which is in line with the objectives and provisions of the Climate Change Act (2008). At the core of the 2008 Climate Change Act is a duty for the government (and by proxy LPAs) "to ensure that the net UK carbon account for the year 2050 is at least 80 per cent lower than the 1990 baseline". As has been outlined in the above section on environmental sustainability, this proposal is a directly tackling this goal. Undeniably, this proposal will have a wholly positive impact on carbon emissions and directly contribute to reducing the carbon footprint of the UK in line with the above policy.

- 10.3 This proposal to install a PV system towards the rear land of a production facility represents an extremely efficient use of land with no official designations within the SNLP. Paragraph 122 of the NPPF states that "planning policies and decisions should support development that makes efficient use of land". Using an unused piece of land for the generation of significant quantities of green energy on a daily basis represents a huge leap in the efficient of use of this space.

11.0 Design + Access

- 11.1 The technical information which accompanies this Planning Statement details the regular lay out of the PV system in the field to the rear of Burston Mill. This detail outlines the aesthetic considerations which have been undertaken to ensure that the associated plant apparatus which will sit on site has a minimal visual impact. The specific detail of these arrangements is outlined in technical notes, plans and drawings accompanying this application and has been discussed in detail previously within this application. For the purposes of this Planning and



Design Statement, however, it is felt pertinent to draw attention to the fact that this detail has been considered the proposed scheme is appropriately designed to have minimal impact on the surrounding context of the site.

- 11.2 The screening assessment undertaken as part of the Glint and Glare assessment indicated that glare from the proposed solar panels at the site will not be visible at surrounding residential dwellings and road infrastructure. In addition, a review of major aviation receptors and rail infrastructure indicated that there are no receptors within the screening criteria for detailed glint and glare assessment.
- 11.3 As part of the above application, we have submitted a Transport Statement which details the impacts of the scheme from an access and highways perspective. This report concluded favourably in support of the application from a transport perspective.
- 11.4 More specifically, it was considered that impacts from the operational phase of the site, consisting of between 10-15 LGVs per year, is not considered to be significant and therefore a full Transport Assessment is not required. However, elements of the NPPG which are relevant to this project, namely, to include details of the existing conditions and issues relating to the Proposed Development, have been considered in this Transport Statement. Increased volumes of traffic will be generated by the Proposed Development during the construction period.
- 11.5 However, the overall volumes of traffic generated were considered to be quite low. During the anticipated 17- week construction period, a total of 24 HGV deliveries will be made to the Site. The haulage route will likely comprise:
- Exit off the A140 onto Dickleburgh Road - Burston Road - Station Road - Crown Green Road - Mill Road - Site access.
- 11.6 The site will be accessed from an existing service access, currently utilised by a Food Processing Unit. The access currently accommodates HGV traffic and does not require any winding or improvement. The Applicant will conduct a pre- and post-construction condition survey of Mill Road that the site is accessed from, from the public road up to the site access point. The Applicant will be liable to repair any damage to the road attributed to the construction of the Proposed Development.
- 11.7 The submitted Transport Statement sets out a variety of specific mitigation measures that will be implemented during construction that will minimise the impact of the construction traffic on the environment and local communities; these include:
- Limitations on working times and HGV scheduling.
 - Site security and signage.
 - Measures to control emissions of dust and other airborne contaminants.
- 11.8 Based on the content of this Transport Statement, it is considered that the development is supportive of National, Regional and Local Transport policy.



11.9 In light of the above and given the nature of the proposed development, it has been demonstrated that the application is acceptable in terms of access considerations.

12.0 Flooding

12.1 The development site is wholly located with Flood Zone 1, which are areas classified as having less than a 0.1% chance of flooding. It is asserted that due to the nature of this proposal not resulting in the removal of permeable surfaces for additional impermeable surfaces, there are no implications for drainage and/or flood risk. As the proposed development site is above 1 ha in size, a supporting Flood Risk assessment is supplied alongside other supporting documents as part of this application.

13.0 Conclusions

13.1 Based on the considerations outlined above and the implementation of the mitigations proposed following from the conclusions of the various supporting reports and surveys submitted, the proposed development is understood to be compliant with both national and local planning policies. The impact of the scheme has been considered from the perspective of a number of important perspectives including Landscape & Visual, Ecology, Drainage and Transport and the applicant's wider project team considers that the proposals submitted will be to the satisfaction of the LPA and statutory consultees in these regards.

13.2 It is therefore demonstrated that the principle of the proposals is acceptable and that this proposal completely aligns with national and local planning policy relating to sustainable development and the relevant goals set out within the JCS & SNLP. Through the supply of extra renewably sourced energy into the national grid, this proposal will directly contribute towards achieving a more sustainable energy mix for the UK and the Government's commitment to achieve net zero emissions by 2050. On top of this, the development is able to achieve this without any negative impact on local resident or visual amenity. As a result of this, it is considered that it has been proven that the application complies with relevant national and local policy.

