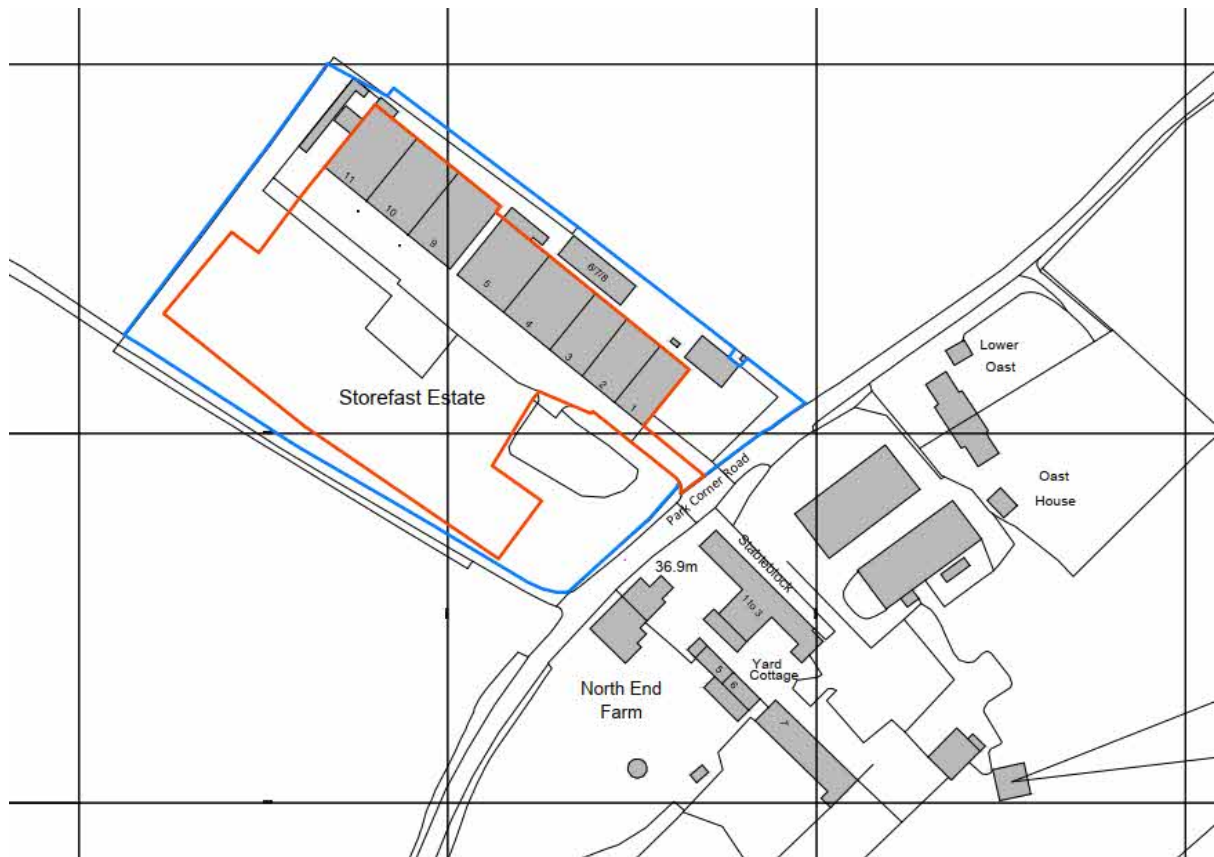


PLANNING AND HERITAGE STATEMENT

**STOREFAST ESTATE (INCLUDING LAND ADJACENT), PARK CORNER ROAD,
BETSHAM, SOUTHFLEET, KENT, DA13 9LJ**

Prepared on behalf of Storefast Ltd



DECEMBER 2023



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1.0 INTRODUCTION

- 1.1 This Statement is submitted in support of a planning application submitted to Dartford Borough Council (DBC) for the following proposed development at land including and adjacent to Storefast Estate, Park Corner Road, Betsham, Southfleet, DA13 9LJ ('the Site'):

Provision of ground mounted solar panels within field, car port mounted solar panels in car park and roof mounted solar panels on existing buildings

- 1.2 There are 2 Land Registry titles that relate to this site, the main one being K877544, which is described as 'land on the north west side of Park Corner Road, Southfleet, Gravesend.' Access to the main part of the Site is provided via land title K781275, both of which are under the ownership of the applicant.

2.0 SITE CONTEXT

- 2.1 The 0.8 hectare Site is located within the rural settlement of Betsham, to the north-west of Park Corner Road within the administrative area of DBC. The wider Storefast Estate site comprises a number of buildings and the surrounding concrete apron, which contain a range of business units and their associated parking and service yards (none of which are in agricultural use). An open field sits to the SW of these units.
- 2.2 The Site is located within the Metropolitan Green Belt and the wider estate is bound to the NW, NE and SW by agricultural land, with Park Corner Road with further industrial uses and residential properties to the SE.

3.0 RELEVANT PLANNING HISTORY

- 3.1 [Erection Of A Building For Refrigerated Storage, Grading & Packing Of Apples.](#)

Ref. No: 66/00610/FULA1 | Status: Application Permitted. This is the main original building, prior to any extensions or additional outbuildings.

- 3.2 [Erection Of Office Building With Toilets.](#)

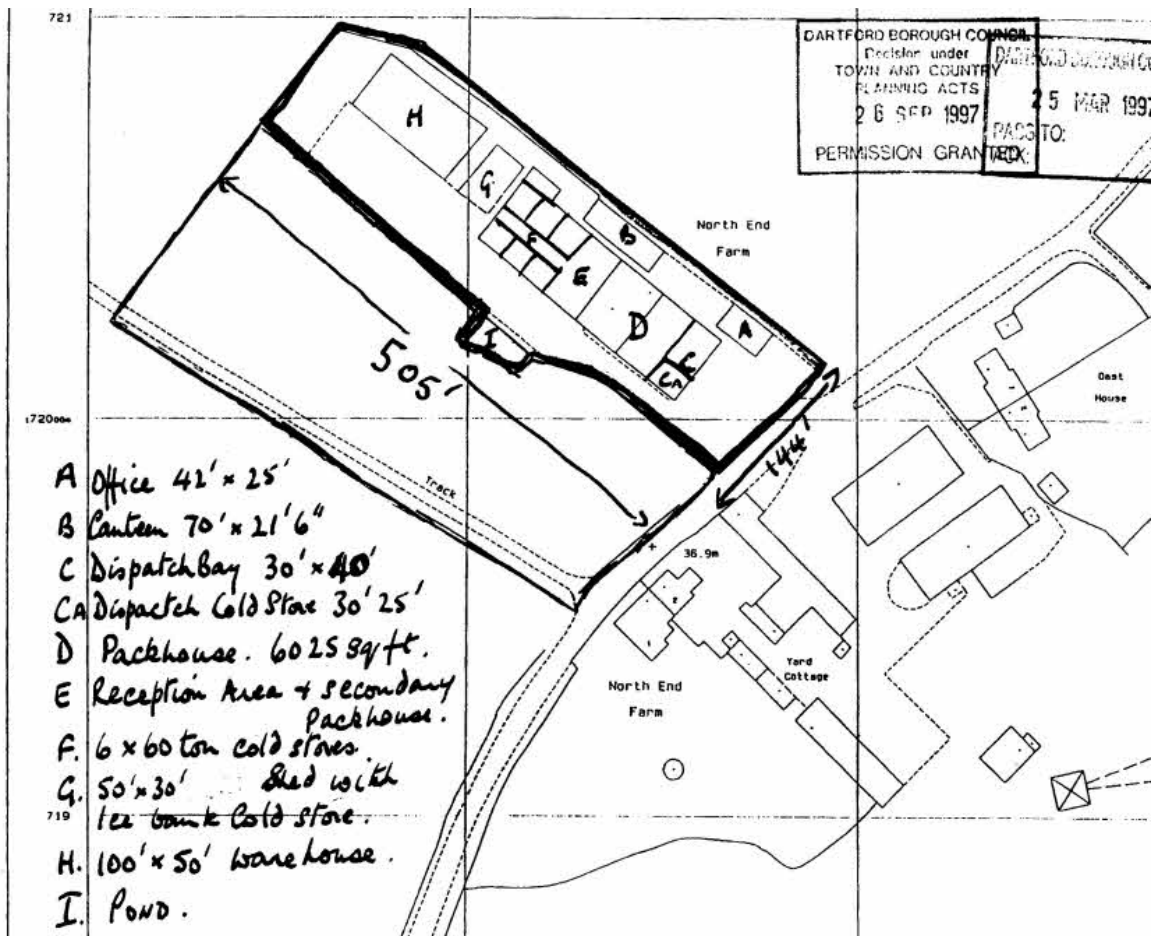
Ref. No: 70/00240/FULA3 | Status: Application Permitted

- 3.3 [Erection Of A Detached Building For Use As A Canteen.](#)

Ref. No: 90/00047/FUL | Status: Application Permitted

- 3.4 [Change of use from cold storage and packing of agricultural products with office and canteen facilities to cold storage and processing of agricultural products with office and canteen facilities](#)

Ref. No: 97/00194/COU | Status: Application Permitted, but this permission was never implemented and later expired. See below for an extract of the existing site plan:



- 3.5 [Application for the variation of Condition 1 of Planning Permission DA/97/00194/COU in respect of an extension of time for commencement of works relating to the change of use from packing to processing agricultural products](#)

Ref. No: 02/00837/FUL | Status: Application Permitted, but not implemented.

- 3.6 [Application under Schedule 2, Part 3, Class O of the Town and Country Planning \(General Permitted Development\) Order 2015 as to whether prior approval is required for change of use from office \(Class B1A\) to residential \(Class C3\) dwelling house and associated development](#)

Ref. No: 16/00346/P30 | Status: Prior Approval was required and approved. This related to the offices beyond the eastern corner of unit 1, which form part of the subject of EN2.

- 3.7 [Application under Section 10 of the Planning and Compensation Act 1991 \(Lawful Development Certificate\) for the erection of a single storey extension to warehouse](#)

Ref. No: 16/01894/LDC | Status: Permission Required. It is noted that the reasons why this proposed certificate of lawfulness was not issued were limited

to the proposed building being taller than 5m within 5m of the curtilage and would have resulted in a reduction in space for parking and turning.

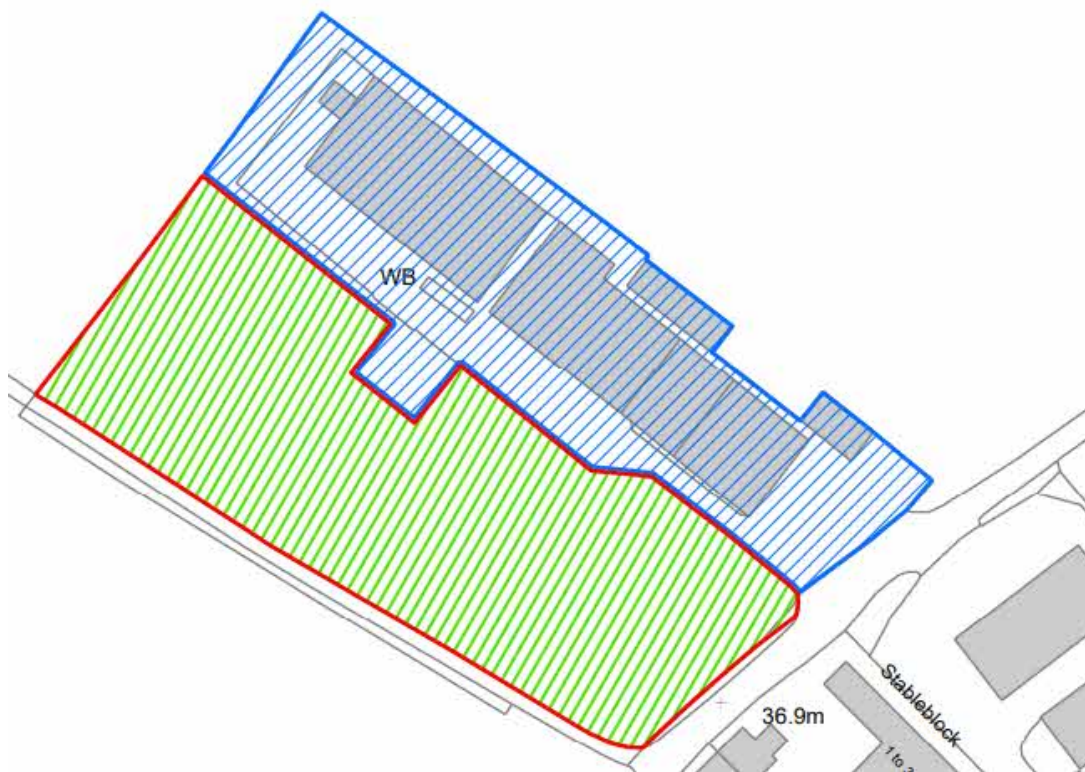
3.8 [Temporary use of land for the stationing of open storage - for the siting of intermediate bulk containers \(retrospective application\)](#)

Ref. No: 20/00029/COU | Status: Application Refused. The land that related to this application was as per the application site. The application was refused on Green Belt grounds as well as being harmful to the setting of a listed building.

3.9 [Application for a Lawful Development Certificate for existing use of land for B8 and B2 storage purposes ancillary to commercial premises known as 'Storefast Estate'](#)

Ref. No: 20/00030/LDC | Status: LDC Refusal. This land affected by this application was the open parcel to the SW of the buildings.

3.10 An enforcement notice ('EN1') was served on 12th February 2020 and was due to take effect on 11th March 2021 in connection with the subject land to the SW of the Storefast Estate buildings, as shown outlined in red below:



3.11 An appeal was lodged by Storefast Ltd, which duly proceeded under DBC reference 19/00162/ENF and appeal reference 3248672. As part of that appeal, under ground (a), the following deemed planning application was judged by the Inspector that involved the change of use of the land from agriculture to a mixed use involving:

- a) *The importation, deposit and open storage of waste, wood, scrap, skips, pallets, materials of various descriptions, including but not limited to, building materials, gas cylinders, plastics, a lorry body and shipping container(s);*
- b) *the parking of vehicles;*
- c) *the importation, deposit and open storage of intermediate bulk containers;*
- d) *areas of hardstanding for the parking of vehicles;*
- e) *the importation, deposit and open storage of soils and sub-soils, including the alteration of the land profile/grading, not in connection with the lawful agricultural use.*

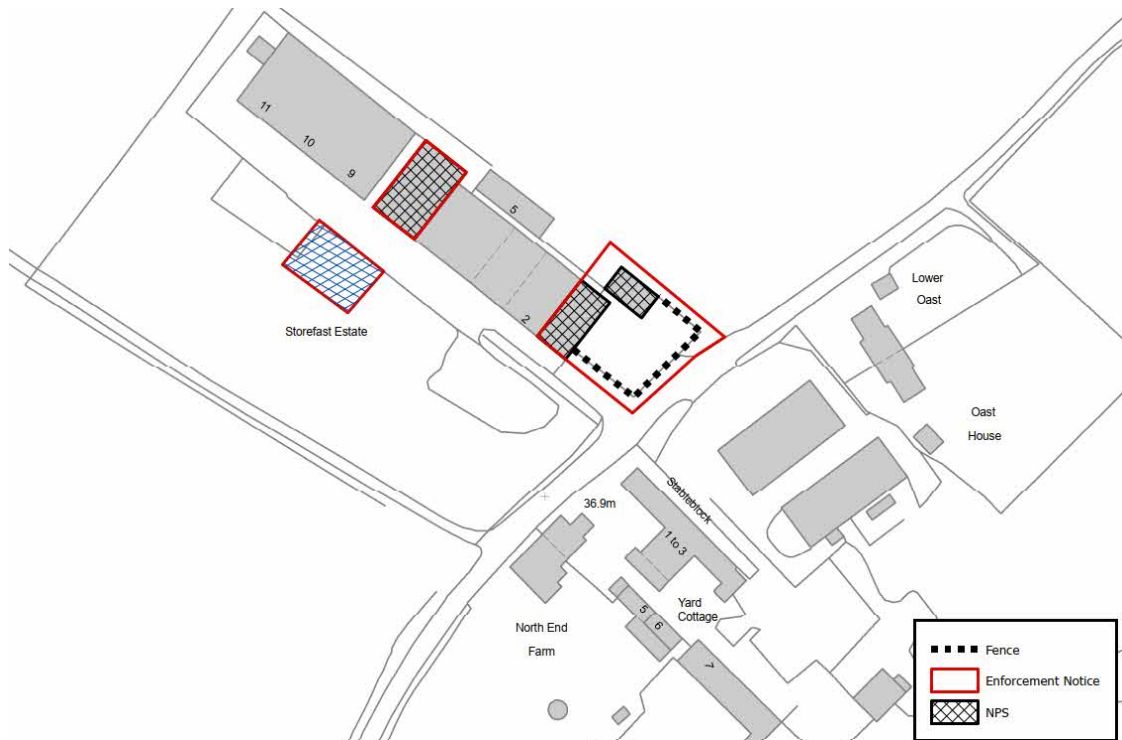
3.12 In judging the deemed planning application, the Inspector concluded that the development would cause substantial harm to the openness of the Green Belt, it would cause less than substantial harm to the adjacent listed building as well as unacceptable noise impacts on nearby residential occupiers.

3.13 The notice was upheld, with all grounds that were the subject of the appeal (i.e. (a), (c) and (d)) being dismissed; in addition to planning permission being refused under ground (a), the alleged use was not found to be lawful (ground (d)) and the matters raised in the notice were found to constitute a breach of planning control (ground (c)). Paragraph 19 of the appeal decision confirms the Inspector's view that the lawful use of the Site was agricultural (APP/T2215/C/20/3248672).

3.14 [Change of use of land for the parking and turning of vehicles and storage compound with associated hardstanding, concrete block enclosures, bund and boundary fence as well as a drainage pond \(part retrospective\).](#)

Ref. No: 21/01703/FUL | Status: Pending Consideration at time of writing. The application site includes some of the land that is the subject of the above extant enforcement notice and the subject application.

3.15 A second enforcement notice ('EN2') was served by DBC on Monday 16th May 2022, under reference 19/00161/ENF. The identified land is shown below:



3.16 EN2 claimed that there had been a breach of planning control relating to:

“The material change in use of the land to a telecommunications contractors yard.”

3.17 The reasons for issuing EN2 are summarised as follows:

1. *The breach occurred within the last 10 years;*
2. *It is inappropriate development in the Green Belt, contrary to the NPPF, policies CS13 and DP22 of the adopted development plan and M13 of the emerging plan;*
3. *The use causes harm by virtue of activity, noise and disturbance, on and off site, comprising traffic, parking, light pollution, and hours of use harming residential amenity, contrary to policies DP3 and DP5 of the adopted development plan and M2, M16 and M17 of the emerging plan;*
4. *The concrete block compound, Heras fencing, open storage of materials and metal fencing is a visually intrusive and incongruous, industrial feature, harming the rural landscape, pattern of development in the area and the setting of North End Farmhouse (Grade II), contrary to policies DP2 and DP13 of the adopted DP.*

3.18 The steps required to address the notice are:

1. *Cease the unauthorised use of the land;*
2. *Remove all items and vehicles associated with the unauthorised use from the land;*
3. *Remove the metal fencing and posts (location shown on the EN plan);*
4. *Remove the Heras fencing, concrete blocks, skips, vehicles, aggregate and all other items associated with the unauthorised use.*

3.19 EN2 was served on the landowner (the appellant) and the occupier, stated as being Network Planning Solutions Ltd (‘NPS’). An appeal was lodged in advance of the

effect date (17th June 2022). NPS later vacated the site on 1st August 2022. As a result, the appeal was withdrawn on 11th August 2022. EN2 remains 'live' given that not all steps to address EN2 have been completed.

3.20 Change of use of buildings to storage (Use Class B8) & offices (Use Class E(g)(i)) with associated parking, together with erection of paladin mesh fencing and gates

Ref. No: 22/01234/FUL | Status: Approved July 2023.

4.0 PROPOSED DEVELOPMENT

4.1 The following three elements are the subject of this planning application:

Ground mounted

Installation of system of 360 ground pole mounted solar panels;
To be located in field to SW of the Storefast Estate buildings;
Comprising four blocks of two rows;
Ground mounting system involves pile driving into the ground;
Maximum height off ground would be 2.3m;
Each individual panel would measure 1.72m (L) by 1m (W);
Footprint area of the panels measures 360 square metres;
The panels will have a SW directional inclination of 31 degrees;

Car port panels

Installation of system of 69 car port solar panels;
To be located opposite Unit 10/11;
Comprising one block of three rows;
Framed system involves pile driving into the ground;
Frame to measure 5.2m (L) by 26m (W);
Maximum height off ground would be 3.3m;
Each individual panel would measure 1.72m (L) by 1m (W);
Footprint of area of the panels measures 125 square metres;
The panels will have a SW directional inclination of 5 degrees;

Building panels

Installation of system of 343 solar panels;
To be attached to the roof of the existing buildings known as Units 1-11;
Comprising 10 clusters of panels of varying sizes;
Each individual panel would measure 1.72m (L) by 1m (W);
Panels to sit on roof with SW directional inclination of between 11-21 degrees.

5.0 PLANNING POLICY

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- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 In terms of the Development Plan for DBC, this comprises the following documents that are relevant to this application:
- Adopted Core Strategy (CS) (2011);
 - Adopted Development Policies Plan (DPP) (2017).
- 5.6 It is considered that the relevant CS policies are as follows:
- CS13: Green Belt.
- 5.7 In the DPP, the following policies are considered relevant:
- DP2: Good Design in Dartford;
 - DP11: Sustainable Technology and Construction;
 - DP12: Historic Environment Strategy;
 - DP13: Designated Heritage Assets;

DP22: Green Belt in the Borough.

Other Material Considerations

Draft Local Plan

- 5.8 DBC submitted for examination the Pre-Submission (Publication) Dartford Local Plan on 13 December 2021 (DLP). The policies of this emerging plan are therefore a material consideration in the determination of planning applications. NPPF paragraph 48 advises weight may be given according to the stage of plan preparation, extent of unresolved objections to relevant policies, and degree of consistency with the NPPF. DBC regards all emerging policies as consistent with the NPPF. DBC considers the plan well advanced, albeit there are currently no examination outcomes available. In terms of policy objections, the following policies lack unresolved objections and therefore may be material considerations afforded greater weight: S3, D1, D2, D3, D7, E3, M5, M6, M11, M13 & M16.
- 5.9 In this particular case, the following policies from the DLP are considered relevant:
- M1: Good Design for Dartford
 - M5 and M6: Historic Environment Strategy
 - M13: Green Belt
 - M15: Biodiversity and Landscape

The Framework

- 5.10 Paragraph 119 states that decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 120 adds that planning decisions should: encourage multiple benefits from rural land, and; promote and support the development of under-utilised land and buildings.
- 5.11 Section 12 of the Framework provides details regarding the requirement of good design. Paragraph 126 states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 130 adds that decisions should ensure that developments: function well and add to the overall quality of the area; are visually attractive; sympathetic to local character and history; establish a strong sense of place; optimise the potential of the site, and; create places that are safe, inclusive and accessible.
- 5.12 Paragraph 150 of the Framework confirms that certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include: (e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds).
- 5.13 Paragraph 151 of the Framework notes that elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need

to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

- 5.14 Paragraph 152 advises that the planning system should support the transition to a low carbon future in a changing climate, including specifically supporting renewable and low carbon energy and associated infrastructure.
- 5.15 Paragraph 158 adds that LPAs should not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions, and; approve the application if its impacts are (or can be made) acceptable.
- 5.16 Paragraph 174 of the Framework sets out several ways in which decisions should contribute to and enhance the natural and local environment. Given that the site is not on the coast and no environmental or ecological issues are expected to be raised, it is considered that the most relevant parts of this paragraph are as follows:
- (a) Protecting and enhancing valued landscapes... (in a manner commensurate with their statutory status or identified quality in the development plan);
 - (b) Recognising the intrinsic character and beauty of the countryside;
 - (d) Minimising impacts on and providing net gains for biodiversity;
 - (f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 5.17 Paragraph 199 advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 206 notes that local planning authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 5.18 The following additional documents are material considerations:
- Parking Standards Supplementary Planning Document 26 July 2012 (PSSPD);
 - National Design Guide 2019 (NPG);
 - National Planning Practice Guidance (NPPG).

6.0 PLANNING ISSUES

- 6.1 Given the above policy considerations and the nature of the proposal, it is considered that the relevant key planning issues are as follows:
- a) Appropriateness of the development in the Green Belt;
 - b) Character and appearance;
 - c) Impact on Heritage Assets;

- d) Biodiversity impact;
- e) If inappropriate development in the Green Belt, whether any very special circumstances exist that would outweigh any harm identified.

a) Appropriateness of development in the Green Belt

- 6.2 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. At the local level, policy DP22 states that inappropriate development in the Green Belt will be resisted in accordance with the Framework and will only be approved in very special circumstances.
- 6.3 In the Framework, regarding new buildings, there does not appear to be any exceptions that could apply to a solar array being sited within the Green Belt. For the adjacent field, that part of the Site is devoid of any buildings or structures, and whilst associated engineering works will not harm the openness of, or the purposes of including land within the Green Belt, the installation of such a vast number of solar panels covering an area of 2,500 sqm and having a maximum height of 4m would reduce the openness of this part of the Site. Man-made structures would be introduced into this part of the overall Site for the first time and would, as a result mean encroachment of development into the countryside, conflicting with one of the purposes of including land within the Green Belt, as per paragraph 134 (though it is noted that there is no suggestion of any other conflicts). This aspect of the development is therefore considered to be inappropriate in the Green Belt.
- 6.4 Conversely, the solar panels that are proposed to be sited on the existing Storefast Buildings will only protrude marginally above the height of the existing roof level. The man-made structures will be attached to existing man-made structures that already harm the openness of the Green Belt. At such a height, when at ground level the perception will be that there is no greater harm to the openness of this part of the Site caused by the addition of solar panels to the roof of the various units. This aspect of the application is therefore considered to constitute appropriate development in the Green Belt.
- 6.5 In assessing harm at the local level, the following criteria from policy DP22 is to be applied:
- (a) The extent of intensification of the use of the site;*
 - (b) The impact of an increase in activity and disturbance resulting from the development, both on and off the site, including traffic movement and parking light pollution and noise;*
 - (c) The impact on biodiversity and wildlife;*
 - (d) The impact on visual amenity or character taking into account the extent of screening required;*
 - (e) Impacts arising from infrastructure required by the development.*
- 6.6 On the first issue there will be no intensification of use of the site as a result of the siting of these solar panels. Once they are in position there will be no ongoing use within the adjacent land or on the roof of the Storefast Estate units other than for occasional maintenance. In connection with this point, there will be no activity or

disturbance, no traffic movements, increased parking demands, light pollution or noise. The applicants have addressed the third issue by agreeing to raise the height of the panels so that they are a minimum 2m off the ground, enabling planting and the overall ecological value of the Site to increase below the panels. The issue of impact on character and appearance is judged in more detail below, but it is the applicant's view that there will be no harm largely in part due to the significant mature screening that surrounds the open adjacent field, whilst the panels to be attached to the roof will be too high to be able to reasonably claim harm would arise. Finally, there would be no infrastructure impacts as a result of either set of panels. Collectively, the applicant considers that the detail of the application means that there will be no conflict with development plan DP22.

Conclusions on the harm to the Green Belt

- 6.7 To conclude on this issue, in the case of Samuel Smith Old Brewery and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd from 16 March 2018, paragraph 39 of the judgment confirms that the term 'preserve' "cannot mean that a proposal can only be regarded as 'not appropriate in Green Belt' if the openness of the Green Belt would be left entirely unchanged. It can only sensibly mean that the effects on openness must not be harmful."
- 6.8 The applicant accepts that the panels to be sited within the adjacent agricultural field could be considered inappropriate development in the Green Belt. However, that is not considered the case regarding the remaining panels that are to be located on the roofs of the Storefast Estate units.

b) Character and Appearance

- 6.9 Policy DP2 (Good Design) expects development to satisfy the local specific criteria for good design in the Borough. In areas of additional design or heritage sensitivity it will be necessary for developments to demonstrate that particular design consideration has been given to ensuring proposals enhance the locality.
- 6.10 Dealing first with the panels to be sited within the adjacent agricultural land, due to mature screening along the boundaries including adjacent to Park Corner Road, the applicant considers that any solar array will not materially harm the character and appearance of the area, despite the height extending to a maximum of 4m off the ground. This part of the Site benefits from a decent level of containment and enclosure and, as such, the applicant's believe that the proposed solar array within this agricultural land will not harm the character and appearance of the area. Should DBC be minded to disagree, it should be noted that there is already site-wide landscaping plan that has been submitted to inform the pending application for the change of use of unit 1. This includes a new native tree and shrub mix of planting around the perimeter of the subject agricultural land that will provide reinforced screening around the site of the proposed solar panels. A condition requiring the implementation of this landscaping plan is likely to be forthcoming and, as it affects land that is owned by the applicant and falls within 'blue land' as shown on the location plan relating to the unit 1 development, it is quite possible to secure via a permission relating to that unit the landscaping that would ultimately affect the perimeter of the subject agricultural land.

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- 6.11 In addition to this, it is noted that the nearest public right of way is to the far SE corner that heads northwards (DR128) but this sits beyond the buildings at the Storefast Estate so views of the panels within the agricultural land will not be wide ranging and possibly limited to only the start of the path.
- 6.12 In terms of the solar panels that are proposed to be attached to the roof of the existing commercial buildings, these are, for similar reasons to the arguments made in respect of Green Belt, unlikely to be visible within the immediate area due to their height and the fact that they will be attached to an existing and much more dominant existing structure that has a commercial appearance.
- 6.13 Given the above and the fact that the Site is not within an area that is covered by any national or local landscape designations it is considered that the development will not result in harm to the character and appearance of the area. In addition to this, even if DBC was minded to disagree, in an appeal decision (reference 3225810) an Inspector found harm to the character and appearance of the area, but went on to acknowledge the fact that the harm would be both temporary and reversible and that these facts outweighed the harm.

c) Impact on Heritage Assets

- 6.14 Policy DP13 states that designated heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Any harm or loss of any designated heritage asset will require clear and convincing justification. Development proposals affecting statutorily listed buildings should have special regard to the desirability of preserving the building or its setting.
- 6.15 North End Farmhouse is a Grade II listed building that exists directly to the SE of the subject agricultural land on the opposite side of Park Corner Road. Its listing entry says it has been listed due to its special architectural or historic interest. The Framework and Policy DP13 are clear that listed buildings, as heritage assets, are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 6.16 The applicant has reviewed the Inspector's comments in connection with the enforcement appeal decision (DBC reference 19/00162/ENF and appeal reference 3248672). The Inspector judged that the alleged development, which included encroachment into the subject agricultural land by virtue of its use for the storage of materials, containers and parking of vehicles, would have only resulted in 'less than substantial' harm to the significance of this listed building.
- 6.17 The scale of the proposed solar array is considered to be far less than the development that was the subject of the previous enforcement appeal and from an appearance perspective a consistent layout of solar panels would, in the opinion of the applicant, appear more appropriate than the random positioning of a variety of stored items and containers. Therefore, it is considered that the proposed solar panels coupled with the
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formalisation of the aforementioned landscaping would result in a material improvement to the current setting of the listed North End Farmhouse, and would have a minor beneficial impact on the designated heritage asset. Even if the impact of the proposed development for the agricultural land is considered to result in less than substantial harm to the listed building, the public benefits such as the vast environmental benefits should be considered to outweigh this perceived harm. For reasons similar to those mentioned above, the solar panels to be added to the existing commercial units will benefit from limited visibility given their height and integration with the existing units.

- 6.18 As such, the proposed development is considered to be in accordance with the Framework, and policies DP2 and DP13 in regards to impacts to heritage assets.

d) Biodiversity impact

- 6.19 The accompanying ecology report confirms that habitats within the application site primarily consist of recently cleared other neutral grassland bordered by a line of trees and mixed scrub. A waterbody used for run off from the grassland area and sealed surface access road and car park through the centre of the application site, was recorded during the preliminary survey.
- 6.20 The conclusions of the report set out suggestions for mitigation, without the requirement for further survey work, is recommended for foraging and commuting bats, hazel dormouse, badger, hedgehog, reptiles, great crested newt and birds (detailed within Appendix 5). Section 10 includes recommended appropriate biodiversity enhancement measures which can be secured as part of the development proposals.

e) Very Special Circumstances

- 6.21 If DBC is minded to conclude that any aspect of the development is inappropriate in the Green Belt, it is then necessary to turn to paragraph 147 of the Framework that confirms such development should not be approved except in very special circumstances. LPAs are expected to attach substantial weight to any harm to the Green Belt and paragraph 148 adds that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriate, and any other harm resulting from the proposal, is clearly outweighed by other considerations. At this point, it is noted that the applicant maintains that it would be unreasonable to find any other harm associated with this development.
- 6.22 Paragraph 151 then specifically states that elements of renewable energy projects will need to be the subject of very special circumstances if such projects are to proceed in the Green Belt. The paragraph adds that such circumstances may include the wider environmental benefits associated with the production of energy from renewable sources. In paragraph 26 of appeal decision 3225810 the Inspector accepts that the provision of 67 solar panels would be modest in scale, but goes on to conclude that the appeal scheme would still make a valuable contribution to cutting greenhouse gas emissions and that this attracted substantial weight. It is noted that this proposal entails the siting of 772 solar panels, significantly more than the referenced appeal

proposal and it would therefore appear to be entirely reasonable to attach even greater weight to the more significant environmental benefits associated with this much larger scale solar development.

- 6.23 Paragraph 158 of the Framework states that renewable energy projects should be located where impacts are, or can be made, acceptable. The applicant has already set out how the development can ensure any impacts on the character and appearance of the area could be addressed, which would be through the retention of the existing landscaping, coupled with a proposed perimeter landscaping scheme, which has already been approved as part of a planning application for unit 1.
- 6.24 In combination, the environmental benefits and the fact that any impacts on the character and appearance of the area can be made acceptable, this amounts to sufficient very special circumstances existing that outweigh the harm to the Green Belt. Such a conclusion on very special circumstances is entirely consistent with appeal decision 3225810 which related to a solar array of a much smaller scale.

7.0 CONCLUSIONS

- 7.1 The applicant accepts that the solar panels within the agricultural land may be considered inappropriate development in the Green Belt, however, there are no other harms associated with this proposal, including in regards to the solar panels that are to be attached to the roof of the existing commercial units at the Storefast Estate.
- 7.2 Through the implementation of a landscaping scheme, the proposal represents an ideal opportunity to improve the visual appearance of the Site, re-using what will otherwise remain a vacant parcel of agricultural land. It makes much better use and improves the efficiency of this site. It is the applicant's view that sufficient very special circumstances exist on this occasion given the vast scale of the solar array.
- 7.3 The applicant respectfully requests that DBC attaches appropriate weight to all relevant policies and come to the view that the proposal, on balance, is in accordance with the development plan as a whole.