



SUNNICA ENERGY FARM

Preliminary Environmental Information Report

Appendix 10A: Relevant Policy

Sunnica Ltd

AUGUST 2020



Quality information

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Table of Contents

1	LVIA Methodology	1
1.1	Introduction.....	1
1.2	National Level Policy	1
	Overarching National Policy Statement for Energy (EN-1), adopted 2001	1
	National Policy Statement for Electricity Networks Infrastructure (EN-5), adopted 2011	6
	National Planning Policy Framework (NPPF), adopted 2019	7
	National Planning Practice Guidance (PPG), Natural Environment (2019) ...	10
	National PPG, Renewable and Low Carbon Energy (2015)	11
1.3	County Policy.....	12
	Suffolk – Creating the Greenest Country – Suffolk Climate Change Partnership	12
	Suffolk Climate Action Plan 3, 2017.....	12
	East Cambridgeshire Local Plan, 2015	13
	East Cambridgeshire District Council Renewable Energy Development (Commercial Scale) Supplementary Planning Document, 2014	17
	East Cambridgeshire District Council Design Guide, SPD, 2012	20
	West Suffolk, Forest Heath and St Edmundsbury Local Plan, Joint Development, Management Policies Document, 2015	21
1.4	Local Policy	26
	Forest Heath Local Development Framework, Core Strategy Development Plan Document, adopted 2010	26
	Forest Heath District Council, Accessible Natural Greenspace Study (2017)	27
1.5	Neighborhood Policy	27
	Fordham Neighbourhood Plan, 2016-2036	27
1.6	Newmarket Neighbourhood Plan 2018-2031, 2019.....	29
1.7	References	31

1 LVIA Methodology

1.1 Introduction

1.1.1 This appendix sets out those policies which are considered relevant to landscape and visual matters at national, county and local levels.

1.2 National Level Policy

Overarching National Policy Statement for Energy (EN-1), adopted 2001

1.2.1 EN-1 (Ref. 1) is part of a suite of NPSs issued by the Secretary of State for Energy and Climate Change and it sets out the Government's policy for delivery of major energy infrastructure, to help deliver the Government's climate change objectives by clearly setting out the need for new low carbon energy infrastructure to contribute to climate change mitigation.

1.2.2 Paragraph 1.7.2 states:

“The development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on biodiversity, landscape/visual amenity and cultural heritage. However the significance of these effects and the effectiveness of mitigation possibilities is uncertain at the strategic and non-locationally specific level at which EN-1 to EN-5 are pitched. Short-term construction impacts are also likely through an increased use of raw materials and resources and negative effects on the economy due to impacts on existing land and sea uses. In general, it should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs, and they explain ways in which this can be done; however, the impacts on landscape/visual amenity in particular will sometimes be hard to mitigate.”

1.2.3 Paragraph 1.7.11 states:

“As noted above, the principal area in which consenting new energy infrastructure in accordance with the energy NPSs is likely to lead to adverse effects which cannot always be satisfactorily mitigated is in respect of landscape and visual effects. EN-1 already contains policies which severely limit the prospects for development of large-scale energy infrastructure in the most attractive landscapes and townscapes. Tightening the development consent policies in EN-1 to make it harder for energy infrastructure to be consented which would have adverse landscape or townscape effects would be likely to make it significantly more difficult to gain consent for a range of large-scale energy infrastructure projects...”

1.2.4 Paragraph 4.1.3 states:

“In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:

- its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
- its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.”

1.2.5 Paragraph 4.1.4 states:

“In this context, the IPC should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology-specific NPS, in the application or elsewhere (including in local impact reports).”

1.2.6 Paragraph 4.2.1 states:

“All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically refers to effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.”

1.2.7 Paragraph 4.2.3 states:

“For the purposes of this NPS and the technology-specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. In some circumstances (for example, gas pipe-lines) it may be appropriate to assess effects arising from commissioning infrastructure once it is completed but before it comes into operation. Details of this and any other additional assessments are set out where necessary in sections on individual impacts in this NPS and in the technology-specific NPSs. In the absence of any additional information on additional assessments, the principles set out in this Section will apply to all assessments.”

1.2.8 Paragraph 4.2.4 states:

“When considering a proposal the IPC should satisfy itself that likely significant effects, including any significant residual effects taking account of any proposed mitigation measures or any adverse effects of those measures, have been adequately assessed. In doing so the IPC should also examine whether the assessment distinguishes between the project stages and identifies any mitigation measures at those stages. The IPC should request further information where necessary to ensure compliance with the EIA Directive.”

1.2.9 Paragraph 4.2.8 states:

“Where some details are still to be finalised the ES should set out, to the best of the applicant’s knowledge, what the maximum extent of the proposed

development may be in terms of site and plant specifications, and assess, on that basis, the effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.”

1.2.10 Paragraph 4.2.9 states:

“Should the IPC determine to grant development consent for an application where details are still to be finalised, it will need to reflect this in appropriate development consent requirements. Clearly, if development consent is granted for a proposal and at a later stage the developer wishes for technical or commercial reasons to construct it in such a way that its extent will be greater than has been provided for in the terms of the consent, it may be necessary to apply for a change to be made to the development consent, and the application to change the consent may need to be accompanied by further environmental information to supplement the original ES.”

1.2.11 Paragraph 4.2.10 states:

“To help the IPC consider thoroughly the potential effects of a proposed project in cases where the EIA Directive does not apply and an ES is not therefore required, the applicant should instead provide information proportionate to the scale of the project on the likely significant environmental, social and economic effects. References to an Environmental Statement in this NPS should be taken as including a statement which provides this information, even if the EIA Directive does not apply.”

1.2.12 Paragraph 4.5.1 states:

“The visual appearance of a building is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object — be it a building or other type of infrastructure — including fitness for purpose and sustainability, is equally important. Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.”

1.2.13 Paragraph 4.5.2 states:

“Good design is also a means by which many policy objectives in the NPS can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies can help mitigate adverse impacts such as noise.”

1.2.14 Paragraph 4.5.3 states:

“Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity

substations will assist in ensuring that such development contributes to the quality of the area.”

1.2.15 Paragraph 5.1.1 states:

“Some impacts (such as landscape and visual impacts) arise from the development of any of the types of energy infrastructure covered by the energy NPSs...”

1.2.16 Paragraph 5.1.2 states:

“The list of impacts (generic and technology-specific) and the policy in respect of the consideration of impacts in this Part and in the impact section of the technology-specific NPSs is not exhaustive. The NPSs address those impacts and means of mitigation that are anticipated to arise most frequently; they are not intended to provide a list of all possible effects or ways to mitigate such effects. The IPC [Planning Inspectorate] should therefore consider other impacts and means of mitigation where it determines that the impact is relevant and important to its decision. The technology-specific NPSs may state that certain impacts should be given a particular weight. Where they do not do so, the IPC should follow any policy set out on the level of weight to be given to such impact set out in this NPS. Applicants should identify the impacts of their proposals in the ES in terms of those covered in this NPS and any others that may be relevant to their application.”

1.2.17 Paragraph 5.9.5 states:

“The applicant should carry out a landscape and visual assessment and report it in the ES...the landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant’s assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.”

1.2.18 Paragraph 5.9.6 states:

“The applicant’s assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character.”

1.2.19 Paragraph 5.9.7 states:

“The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on local amenity, and nature conservation.”

1.2.20 Paragraph 5.9.8 states:

“Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having

regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.”

1.2.21 Paragraph 5.9.14 states:

“Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England or a local development plan in Wales has policies based on landscape character assessment, these should be paid particular attention. However, local landscape designations should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.”

1.2.22 Paragraph 5.9.15 states:

“The scale of such projects means that they will often be visible within many miles of the site of the proposed infrastructure. The IPC should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.”

1.2.23 Paragraph 5.9.16 states:

“In reaching a judgment, the IPC should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the IPC considers reasonable.”

1.2.24 Paragraph 5.9.17 states:

“The IPC should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by reasonable mitigation.”

1.2.25 Paragraph 5.9.18 stated:

“All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.”

1.2.26 Paragraph 5.9.21 states:

“Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.”

1.2.27 Paragraph 5.9.22 states:

“Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration.”

1.2.28 Paragraph 5.10.2 states:

“The Government’s policy is to ensure there is adequate provision of high quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Open spaces, sports and recreational facilities all help to underpin people’s quality of life and have a vital role to play in promoting healthy living. Green infrastructure in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change.”

1.2.29 Paragraph 5.10.5 states:

“The ES (see Section 4.2) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan.”

1.2.30 Paragraph 5.10.19 states:

“Although in the case of much energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some at least of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project.”

National Policy Statement for Electricity Networks Infrastructure (EN-5), adopted 2011

1.2.31 EN-5 (Ref. 2) provides the primary basis for decisions taken by the Infrastructure Planning Commission [Planning Inspectorate] on applications it receives for electricity networks infrastructure.

1.2.32 Paragraph 2.2.5 states:

“There will usually be some flexibility around the location of the associated substations and applicants will give consideration to how they are placed in the local landscape taking account of such things as local topography and the possibility of screening.”

1.2.33 Paragraph 2.8.4 states:

“Where possible, applicants should follow the principles below in designing the route of their overhead line proposals and it will be for applicants to offer constructive proposals for additional mitigation of the proposed overhead line.

While proposed underground lines do not require development consent under the Planning Act 2008, wherever the nature or proposed route of an overhead line proposal makes it likely that its visual impact will be particularly significant, the applicant should have given appropriate consideration to the potential costs and benefits of other feasible means of connection or reinforcement, including underground and sub-sea cables where appropriate. The ES should set out details of how consideration has been given to undergrounding or sub-sea cables as a way of mitigating such impacts, including, where these have not been adopted on grounds of additional cost, how the costs of mitigation have been calculated.”

1.2.34 In terms of screening, paragraph 2.8.11 states:

“Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and

Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.”

National Planning Policy Framework (NPPF), adopted 2019

1.2.35 The NPPF (Ref. 3) sets out the Government’s planning policies for England and how these should be applied.

1.2.36 NPPF paragraph 8(c) states the environmental objective of sustainable development is:

“to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

1.2.37 NPPF paragraph 98 states:

“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

1.2.38 NPPF paragraph 110 states that developments should:

“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...”

1.2.39 NPPF paragraph 118 states planning policies should:

“a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside...”

1.2.40 NPPF paragraph 127 states:

“Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

1.2.41 NPPF paragraph 128 states:

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

1.2.42 NPPF paragraph 130 states:

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).”

1.2.43 NPPF paragraph 131 states:

“determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the

standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

1.2.44 NPPF paragraph 148 states:

“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

1.2.45 NPPF paragraph 151 states:

“To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”

1.2.46 NPPF paragraph 153 states:

“In determining planning applications, local planning authorities should expect new development to:

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”

1.2.47 NPPF paragraph 170 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (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, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

1.2.48 Paragraph 171 states:

“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”

1.2.49 Paragraph 180 states:

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*

National Planning Practice Guidance (PPG), Natural Environment (2019)

1.2.50 The PPG (Ref. 4) identifies Green Infrastructure, Biodiversity and Landscape.

1.2.51 In respect of Green Infrastructure, the PPG includes:

“Green infrastructure opportunities and requirements need to be considered at the earliest stages of development proposals, as an integral part of development and infrastructure provision, and taking into account existing natural assets and the most suitable locations and types of new provision.”

1.2.52 In respect of landscape, the PPG refers to Natural England guidelines and the benefits of landscape character assessments.

National PPG, Renewable and Low Carbon Energy (2015)

1.2.53 The PPG (Ref. 15Ref. 4) states:

“Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.”

1.2.54 Planning considerations include:

“cumulative impacts require particular attention, especially the increasing impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases; and

local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas.”

1.2.55 In respect of buffer zones:

“Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis.”

1.2.56 Particular considerations for ground mounted solar are:

“The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.

Particular factors a local planning authority will need to consider include:

- encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land, provided that it is not of high environmental value;*
- where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.*

- *that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;*
- *the proposal's visual impact, the effect on landscape of glint and glare (see guidance on landscape assessment) and on neighbouring uses and aircraft safety;*
- *the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;*
- *the need for, and impact of, security measures such as lights and fencing;*
- *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;*
- *the potential to mitigate landscape and visual impacts through, for example, screening with native hedges;*
- *the energy generating potential, which can vary for a number of reasons including, latitude and aspect.*

The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.”

1.3 County Policy

Suffolk – Creating the Greenest Country – Suffolk Climate Change Partnership

1.3.1 The CGC (Ref. 15Ref. 5) vision states:

“Suffolk wants to be an exemplar in tackling climate change and protecting and enhancing its natural...environment...to be the county with the greatest reduction in carbon emissions.”

Suffolk Climate Action Plan 3, 2017

1.3.2 The Suffolk Climate Action Plan 3 (Ref. 6) includes actions for delivering carbon savings including a:

“range of projects that may be brought forward under this theme is wide and can include Solar PV, Solar Thermal, Air Source Heat Pumps, Battery Storage, Insulation programmes amongst others.”

East Cambridgeshire Local Plan, 2015

1.3.3 The East Cambridgeshire Local Plan (Ref. 7) sets out a blueprint for the future growth of East Cambridgeshire and is the main basis for making decisions on planning applications.

1.3.4 Two key issues for East Cambridge are:

“Retaining distinctiveness and character – There is a need to ensure that the character and appearance of the built environment is protected and enhanced, especially within areas of historic importance. It will also be important to ensure that all new development is well designed and locally distinctive. Enhancing the character and distinctiveness of the district will help to benefit tourism.

Climate change and green infrastructure – The district is particularly vulnerable to the impacts of climate change such as flooding and drought, because many areas are low lying and within areas of water stress. The provision of green infrastructure is recognised as a desirable 'win-win' approach to combating climate change, since it can deliver other social, economic and environmental benefits. Maximising the creation of new green infrastructure will help to deliver a sustainable 'green living landscape.’

1.3.5 The spatial vision includes:

“The overall diversity and quality of East Cambridgeshire’s countryside and natural environment will have improved and the historic environment conserved and enhanced. There will be better access to the countryside and green spaces for local communities which helps to improve people’s quality of life. The challenges presented by climate change will have been embraced, with new development being located and designed to minimise resource and energy use and reduce the risk of flooding. Renewable energy production will have increased, and a proportion of all energy will be created from local renewable sources such as bio-fuels, biomass, and wind power.”

1.3.6 The strategic objectives include:

“Ensure that new development is of high quality and sustainable design which reflects local character and distinctiveness, provides attractive and safe environments, and is supported by appropriate facilities and services;

Protect and enhance the quality, local distinctiveness and diversity of the natural, historic and built environment.”

1.3.7 Chapter 6: Environment and Climate Change includes:

“The character areas are described in more detail in the County Council’s ‘Cambridgeshire Landscape Guidelines’ (1991), which remains the baseline evaluation of landscape in the County. The Guidelines stress the need to pay special attention to the design of edges of towns and villages and their integration with and relationship to the wider landscape. This requires the location, scale and height of development, views into and out of the settlement and the detailed edge treatment to be considered carefully. These matters are particularly important given the predominantly flat landscape of the district. A clear distinction between countryside and developed areas, including that

between gardens and farmland, should be maintained and ad hoc changes damaging this relationship will not be permitted;

...; and

In protecting landscape and settlement character the Council will expect: important existing views into and out of settlements to be maintained and enhanced and new ones to be created; important open spaces to be retained; and wildlife features to be undisturbed, as detailed in other policies within this Plan.”

1.3.8 Policy ENV 1: Landscape and settlement character states:

“Proposals for development should be informed by, be sympathetic to, and respect the capacity of the distinctive character areas defined in the Cambridgeshire Landscape Guidelines. Development proposals should demonstrate that their location, scale, form, design, materials, colour, edge treatment and structural landscaping will create positive, complementary relationships with existing development and will protect, conserve, and where possible enhance:

- The pattern of distinctive historic and traditional landscape features, such as watercourses, characteristic vegetation, individual and woodland trees, field patterns, hedgerows and walls, and their function as ecological corridors for wildlife dispersal.
- The settlement edge, space between settlements, and their wider landscape setting.
- Visually sensitive natural and man-made skylines, hillsides and geological features.
- Key views into and out of settlements; this includes quintessential views of Ely Cathedral and the setting of the City as a historic ‘isle’ settlement close to the fen edge and the valley of the River Great Ouse.
- The unspoilt nature and tranquility of the area.
- Public amenity and access; and
- Nocturnal character of rural areas free from light pollution. Suitable compensatory provision must be made in the event of significant harm where necessary.”

1.3.9 Paragraph 6.3.3 states:

“The Local Plan objectives also address the impacts of development on climate change. Good design can reduce energy consumption and improve sustainability through mitigation. The Council will actively promote development incorporating new technology that promotes energy and water conservation, and landscaping that mitigates climate change effects. Further details are set out in Policy ENV 4 on sustainable design and construction.”

1.3.10 Policy ENV 2: Design includes:

“All development will be designed to a high quality, enhancing and complementing local distinctiveness and public amenity by relating well to existing features and introducing appropriate new designs. Design which fails

to have regard to local context including architectural traditions and does not take advantage of opportunities to preserve, enhance or enrich the character, appearance and quality of an area will not be acceptable and planning applications will be refused. The Council will prepare and adopt development frameworks to guide the development of key sites. Developers will be required to prepare detailed Masterplans for these sites, and for other large-scale developments and developments in sensitive areas, and submit these alongside an outline or initial application. In addition to key design principles, masterplans should include details on infrastructure delivery and phasing. Design codes will be required for certain proposals and should be submitted for approval between outline and reserved matters application stages.

- Make efficient use of land while respecting the density, urban and village character, public spaces, landscape and biodiversity of the surrounding area;
- Retain existing important landscaping and natural and historic features, and include landscape enhancement schemes;
- Protect important views into and out of settlements and key views of landmark buildings, especially ensuring that there is no detrimental effect on the appreciation of Ely as an historic cathedral city in the quality of the approaches and the quality of distant and close up views of the cathedral;
- Ensure there is no significantly detrimental effect on the residential amenity of nearby occupiers, and that occupiers and users of new buildings, especially dwellings, enjoy high standards of amenity;
- Provide structure and legibility to navigate through developments by making use of existing views, vistas, landmarks and built and natural landscapes and creating new ones; and
- Incorporate the highway and access principles contained in Policy COM 7 into designs to ensure:
 - *That networks of pedestrian and cycle routes (linking to existing routes where opportunities exist) give easy access and permeability within developments and to adjacent areas; and*
 - *Protection of rights of way.”*

1.3.11 Paragraph 6.7.1 states:

“Opportunities for renewable energy generation in the district includes solar radiation, wind power, anaerobic digestion, biomass, ground heat sources and other technologies.”

1.3.12 Paragraph 6.7.3 states:

“Proposals for renewable energy schemes will be supported wherever possible. The wider environmental, social and economic benefits will be given significant weight in planning decisions. However when assessing proposals, consideration will also be given to potential impacts on the local environment and amenity, including key views (in particular of Ely Cathedral), important wildlife sites, protected species and residential amenity, and significant adverse effects will be avoided. A landscape assessment will be a key part of this evaluation. Various types of technology will give rise to different impacts,

and Policy ENV 6 sets out the broad criteria against which any scheme for renewable energy will be assessed. The Council will expect developments for energy generation to remediate potential adverse impacts, especially in relation to visual impact, through careful location, design and landscaping following the design principles set out in this Plan.”

1.3.13 Policy ENV 6: Renewable energy development states:

“Proposals for renewable energy and associated infrastructure will be supported, unless their wider environmental, social and economic benefits would be outweighed by significant adverse effects that cannot be remediated and made acceptable in relation to:

- The local environment and visual landscape impact.
- Impact on the character and appearance of the streetscape/buildings.
- Key views, in particular those of Ely Cathedral.
- Protected species.
- Residential amenity.
- Safeguarding areas for nearby airfields; and
- Heritage assets.
- Renewable energy proposals which affect sites of international, national and local nature importance or other irreplaceable habitats will be determined against the relevant sections of Policy ENV 7. The visual and amenity impacts of proposed structures will be assessed on their merits, both individually and cumulatively. Provision should be made for the removal of facilities and reinstatement of the site, should they cease to operate.”

1.3.14 Policy ENV 11: Conservation Areas states:

- *“Development proposals, within, or affecting a Conservation Area should: Be of a particularly high standard of design and materials in order to preserve or enhance the character or appearance of the area.*

Seek to retain attractive traditional materials and features such as original doors, windows, chimneys and boundary walls; and

Only involve the demolition of buildings where:

- *They are structurally unsound (for reasons other than deliberate damage or neglect), beyond reasonable repair, and measures to sustain the existing use or find an alternative use/user have been exhausted; and in all cases*
- *They have little or no architectural, historic or visual significance or have a negative impact on the Conservation Area; and in all cases*
- *Comprehensive proposals for reconstruction or redevelopment have been submitted and have received planning permission.*

Where there is an adopted Conservation Area Appraisal SPD, developers will be expected to show how this has informed their proposals.”

1.3.15 Policy ENV 15: Historic Parks and Gardens states:

“Proposals that affect the significance of a Historic Park or Garden will not be permitted where they would have a detrimental impact on its character, amenity or setting. As part of any permission, the Council may seek the agreement of a management plan to secure the long-term preservation of the asset promote good land management and encourage best use of resources.”

1.3.16 Policy COM 5: Strategic green infrastructure states:

“Proposals which would cause loss of or harm to existing strategic green infrastructure will not be permitted, unless the need for and benefits of the development demonstrably and substantially outweigh any adverse impacts on the green infrastructure. The Council will support proposals for new and improved strategic green infrastructure where these:

- Are consistent with the objectives of the Cambridgeshire Green Infrastructure Strategy (2011).
- Provide increased public access for quiet recreation and/or increased provision for biodiversity.
- Do not harm the character and appearance of any existing buildings or the locality.
- Will have no adverse effects on any existing designated sites of conservation or biological importance and impacts will be monitored to ensure the effectiveness of alternative provision away from more sensitive sites.
- Would not (by itself or cumulatively) have a significant adverse impact in terms of the amount or nature of traffic generated.
- Will not detract from residential amenity; and
- Will aim to achieve Natural England's Accessible Natural Greenspace Standards (ANGSt) through improving accessibility, naturalness and connectivity of greenspaces, which are appropriate in scale and location to the needs of the local community. New development will be expected to contribute towards the establishment, enhancement and on-going management of strategic green infrastructure by contributing to the development of strategic green infrastructure network within the district, in accordance with Policy GROWTH 3.”

East Cambridgeshire District Council Renewable Energy Development (Commercial Scale) Supplementary Planning Document, 2014

1.3.17 The Supplementary Planning Document (Ref. 8) sets out East Cambridgeshire District Council's approach to renewable energy proposals, focusing on larger 'standalone' renewable energy schemes which are of a commercial scale.

1.3.18 It states that 'benefits' of renewable energy are a reduction of carbon emissions and environmental benefits, including creating new habitats.

1.3.19 Paragraph 2.4.5 states:

“In summary proposals for renewable energy generation will be considered on their merits, on a case by case basis. The Council will take account of any environmental, economic or social benefits (as outlined on page3), and will consider whether there are any adverse impacts, for example on landscape

character, the natural and historic environment, public rights of way and highway network, residential amenity and the operation of aviation sites. The Council will refuse planning permission for commercial scale renewable energy schemes where it is considered that there are significant adverse impacts which outweigh the wider benefits of renewable energy development identified above.”

1.3.20 Paragraph 3.1 states:

“The visual impacts on the landscape as a result of renewable energy development will come about as a result of changes in the available views through intrusion or obstruction and whether these views may be improved or reduced. Applicants will need to consider the impacts of renewable energy development on these landscapes and existing views within the district...”

1.3.21 Paragraph 3.2 states:

“Solar farms can change the character of an area particularly where sites are likely to be more visible e.g. located in a hilly area.”

1.3.22 The matters applicants must consider with an application are:

Impacts upon views: *The potential impact the development may have on views Within the district and potentially neighbouring districts (both during and after construction). Given the low lying nature of the district it will be important to consider the impact on any long distance view(s). In doing so applicants should have regard to views which are currently available from and to settlements, roads, railway lines, publicly accessible land, public rights of way and designated heritage assets (Conservation Areas, Scheduled Monuments, Listed Buildings and Historic Parks And Gardens). Applicants will be expected to undertake a desktop review which identifies sensitive receptors from the above list which are relevant to the proposed Development.*

Ely Cathedral: *The potential impact that development may have on the views and wider landscape setting of Ely Cathedral should be fully considered, given its national and international importance. Proposals which are visually dominant an have an adverse impact on views of Ely Cathedral and its landscape setting, including those outlined in the Council’s Ely Environmental Capacity Study or success or document, are unlikely to be acceptable.*

Associated buildings and infrastructure: *Consideration should also be given to the design of associated buildings and infrastructure on the landscape and neighbouring land. For example connections to the electricity supply have a significant visual impact dependent upon the location and scale of such infrastructure and will need to be considered by the applicant where these form part of the planning application. Applicants will also be expected to provide sufficient detail relating to the design of associated infrastructure including any access roads/tracks and security fencing to enable the application to be determined.*

Cumulative landscape and visual impacts: *Where more than one renewable energy scheme is proposed, or where a single scheme is proposed in an area with existing schemes, the combined effect of all schemes taken together is known as the ‘cumulative effect’. Guidance relating to the issues which need to be considered in assessing cumulative effects of wind farms is outlined in the*

Government's 'Planning Practice Guidance'. Applicants will be expected to provide sufficient evidence to demonstrate that these issues have been fully assessed.

Similar considerations are relevant to development of solar farms within the district. However it is important to note that the impacts of ground mounted panels can be mitigated with effective screening. Where new hedging is proposed the expectation is that native species will be provided as part of the development.

Mitigation measures: *Where it is possible to mitigate any landscape impacts sufficient detail should be provided of any proposed landscaping to enable the application to be determined. Any off-site landscape mitigation would need to be secured through a Section 106 agreement.*

Landscape and Visual Impact Assessment: *A Landscape and Visual Impact Assessment will be required for renewable energy proposals identifying changes to existing view(s) and the significance of any impacts relative to the sensitivity of the landscape. The Landscape and Visual Impact Assessment of renewable energy proposals provided should be consistent with the methodology set out in 'Guidelines for Landscape and Visual Impact Assessment', 3rd Edition (2013). Applicants should also have regard to the Landscape Institute's published advice relating to the use of photomontages(AdviceNote01/11). Reference should also be made to the guidance relating to the landscape character within the district provided in the following sources:*

- Natural England's National Character Area Profiles (currently under review)
- Cambridgeshire Landscape Guidelines (1991) (Cambridgeshire County Council)
- Cambridgeshire Historic Landscape Characterisation (Cambridgeshire County Council)
- Ouse Washes Landscape Character Assessment (Ouse Washes Landscape Partnership) (2014)."

1.3.23 Paragraph 8.3 (2) states:

"Renewable energy development schemes will be expected to incorporate existing public rights of way without the need for existing routes being diverted. Applicants will also be expected to seek advice when developing their proposals from the Rights of Way and Access Team at Cambridgeshire County Council. Where renewable energy developments adversely affect the existing public rights of way network, provision should be made to offset the disadvantages to the public. Any proposed diversions to the public rights of way network would need to be agreed with Cambridgeshire County Council."

1.3.24 Paragraph 9.5 states:

"Where it is proposed to develop a solar farm on a green field site applicants will be expected to provide the following information as part of the planning application:

- The amount of high quality agricultural land (Grades 1, 2 and 3a) which will be developed as part of the application;

- Alternative sites which have been considered including the agricultural or environmental value of these sites and why these have been discounted;
- To what extent the proposed site will remain in agricultural use following development; and
- How the site is intended to be restored to agricultural use.”

East Cambridgeshire District Council Design Guide, SPD, 2012

1.3.25 The Design Guide (Ref. 9) sets out prescribed rules that should be adhered to, unless material considerations indicate otherwise and focuses attention on the design issues that will be assessed when determining applications.

1.3.26 Development is required to consider:

- “Urban/rural context;
- Historical context;
- Geographical context;
- Links to other places; and
- What sort of development do we want?”

1.3.27 In terms of landscape matters, the EC DG adapts the Cambridgeshire Landscape Guidelines (1995) and notes that in order to ‘stem the decline’ in the countryside:

*“it is essential that there is a positive response to the issues highlighted below:
Renewable energy and the impact that this may have on the landscape e.g. solar farms...”*

1.3.28 Achieving landscape goals for development includes:

“Consider existing important views from roads, paths and public areas. Pay special regard to views of church spires, fine buildings or designed landscapes. Consider framing existing views or creating new ones;

Paying particular attention to the edges of new development, especially where boundaries are adjacent to the countryside. Avoid clutter, bland or repetitive compositions and large-scale masses;

Consider using hedges and woodlands as screening. Where quality architecture exists (i.e. walls or buildings), planting could be used as a foil rather than a screen;

Reflect the local landscape character through the choice of appropriate native species; pattern of woodland/copses/hedgerows; use of landform; avoidance of harsh lines; use of local materials for walls and structures;

Seek opportunities for creative habitat enrichment including open watercourses and dense native species hedgerows rather than using ornamental shrubs or coniferous hedging. Such enrichment could include hedges, copses, ditches and ponds; and

Major development schemes should offer environmentally based opportunities as an integral part of the proposal. Possibilities could include woodlands, ‘pocket parks’, off-site landscape improvements, nature reserves, teaching

areas close to schools, formal and informal recreation and links to the countryside utilising existing rights of way or newly created footpaths.”

1.3.29 With respect to solar developments, the EC DG states:

“It is the smaller projects that represent the greatest challenge when dealing with development and design. Small-scale installations can have a significant effect visually, with regard to urban and rural vistas, street scenes, historic buildings and heritage assets.”

West Suffolk, Forest Heath and St Edmundsbury Local Plan, Joint Development, Management Policies Document, 2015

1.3.30 The Management Policies Document (Ref. 10) will be used in day-to-day planning decisions across both Forest Heath and St Edmundsbury.

1.3.31 Policy DM2: Creating Places includes:

“Proposals for all development (including changes of use, shopfronts, and the display of advertisements) should, as appropriate:

a. recognise and address the key features, characteristics, landscape/townscape character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape/townscape character appraisal to demonstrate this;

b. maintain or create a sense of place and/or local character, particularly restoring or enhancing localities where strong local characteristics are lacking or have been eroded;

c. preserve or enhance the setting of, or views into and out of, a Conservation Area;

g. taking mitigation measures into account, not affect adversely:

i. the distinctive historic character and architectural or archaeological value of the area and/or building;

ii. the urban form, including significant street patterns, individual or groups of buildings and open spaces;

iii. important landscape characteristics and prominent topographical features;

iv. sites, habitats, species and features of ecological interest;

v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or

vi. residential amenity; and

j. produce designs that respect the character, scale, density and massing of the locality.”

1.3.32 Policy DM5: Development in the Countryside states:

“Proposals for economic growth and expansion of all types of business and enterprise that recognises the intrinsic character and beauty of the countryside will be permitted where:

- *it will not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a);*
- *there will be no significant detrimental impact on the historic environment, character and visual amenity of the landscape or nature conservation and biodiversity interests; and*
- *there will be no significant adverse impact on the local highway network.”*

1.3.33 Policy DM8: Low and Zero Carbon Energy Generation states:

“All proposals for generation or recovery of low carbon or renewable energy, such as wind turbines, biomass, and combined heat and power, will be encouraged subject to the following criteria:

a. proposals will be required to demonstrate the new carbon saving benefit that they will create, taking into account both carbon dioxide savings from renewable energy generation and any additional carbon dioxide generation that results from the proposal;

b. proposals will be required to include a landscape and visual assessment which should, where appropriate:

i. show the impact of the proposal in the landscape or townscape. All development should be designed and sited to minimise intrusion and visual impact;

ii. include mitigation measures to address the visual impact of the scheme;

iii. include an appraisal of the impact on the environment of the proposal either in isolation or cumulatively with any other similar developments;

c. where appropriate the proposal includes provision for mitigation and compensation measures, such as habitat enhancement or relocation.

All proposals will need to demonstrate to the satisfaction of the Local Planning Authority that due regard has been given to the following:

d. the impact of off-site and on-site power generation infrastructure including achieving underground connections to the electricity grid system; and

e. in respect of proposals for wind turbines, current standards relating to noise emission, shadow flicker and other negative effects such as interference to television transmission and air traffic control systems and the effects on public health; and

f. soil quality is not affected adversely by either construction or the operation or decommissioning of the development.

In the case of proposals in nature conservation sites, or within or visible from Conservation Areas or other heritage assets, the developer or operator must be able to demonstrate to the satisfaction of the Local Planning Authority that the proposal represents the highest standards of siting and design appropriate to the location.”

1.3.34 Policy DM13: Landscape Features states:

“Development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value.

Areas of particular landscape sensitivity, including Special Landscape Areas (as defined on the Policies maps) have been identified. These areas, and other valued landscapes such as The Brecks and the Stour Valley (subject of a management and delivery plan through the Dedham Vale AONB and Stour Valley Project) have, by reason of their landform, historic landscape importance and/or condition, a very limited capacity to absorb change without a significant material effect on their character and/or condition. However, individual proposals within or adjacent to these areas will be assessed based on their specific landscape and visual impact.

All proposals for development should be informed by, and be sympathetic to, the character of the landscape. Landscape Character Types are identified in the Suffolk Landscape Character Assessment.

However, the ‘Type’ boundaries are only indicative, being mapped for the whole county at a scale of 1:50,000.

Therefore, the character of the site and setting of a proposal should be individually assessed.

All development proposals should demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape.

Developers/applicants will be required to submit, where appropriate, landscaping schemes with applications for planning permission and for the approval of reserved matters.

Where any harm will not significantly and demonstrably outweigh the benefit of the proposal, development will be permitted subject to other planning considerations.

However, it is essential that commensurate provision must be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features.

Where this is not possible development will not be permitted.”

1.3.35 The supporting text to the above policy also states:

“Across West Suffolk gaps between settlements, including in those parishes with a number of separate greens or hamlets, and the landscape setting of settlements are essential components of their character and local distinctiveness. It is therefore important that the significance of these gaps is recognised and that new development does not dilute their contribution to maintaining the distinct form of these settlements, their landscape setting and separation from other settlements.”

1.3.36 Policy DM15: Listed Buildings states:

“Proposals to alter, extend or change the use of a listed building, or development affecting its setting, will be permitted where they:

- a. demonstrate a clear understanding of the significance of the building and/or its setting, alongside an assessment of the potential impact of the proposal on that significance;*
- b. contribute to the preservation of the building;*
- c. are not detrimental to the building’s character or any architectural, archaeological, artistic or historic features that contribute towards its special interest;*
- d. are of an appropriate scale, form, height, massing, and design which respects the existing building and its setting;*
- e. use appropriate materials and methods of construction which respect the character of the building;*
- f. have regard to the historic internal layout and other internal features of importance;*
- g. respect the setting of the listed building, including inward and outward views;*
- h. respect the character or appearance of a park, garden or yard of historic or design interest, particularly where the grounds have been laid out to complement the design or function of the building. A curtilage and/or setting which is appropriate to the listed building, and which maintains its relationship with its surroundings should be retained; and*
- i. have regard to the present and future economic viability or function of the listed building.*

Proposals to demolish all or part of a listed building will only be permitted in very exceptional circumstances. Applicants must demonstrate that all reasonable efforts have been made to sustain existing uses or find viable new ones, and that they have addressed the considerations set out in national legislation and guidance. Where appropriate, the recording of the building to a specified standard will be required prior to the commencement of demolition.

All development proposals should provide a clear justification for the works, especially if these works would harm the listed building or its setting, so that the harm can be weighed against any public benefits.

The level of detail of any supporting information should be proportionate to the importance of the building, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.”

1.3.37 Policy DM19: Development Affecting Parks and Gardens of Special Historic Interest:

“Proposals for development which affect the character, setting, or views into and/or out of parks and gardens of special historic or design interest and their settings must not have a detrimental impact upon:

- a. the overall design and layout;*
- b. features, both built and natural, which form an integral part of the design and layout; and*

c. views into, through, or out of the park or garden, particularly those which are an integral part of the design.”

1.3.38 Policy DM31: Farm Diversification:

“Proposals for farm diversification will be permitted providing they meet the following criteria:

a. the proposal is a subsidiary component of the farm enterprise and contributes to the continuing viability of the farm as a whole, retaining existing or providing new employment opportunities and services for the local community;

b. the scale and nature of the proposal must be appropriate within its rural location and where it is likely to create significant vehicular movements to and from the site it should be well located in relation to sustainable settlements;

c. the proposal should re-use or adapt any existing farm buildings which are suitable and where appropriate include the removal of any redundant buildings which are derelict or offer no opportunity for beneficial use;

d. if a new building can be justified it should be sited in or adjacent to an existing group of buildings, be compatible in scale, design, siting and materials, must relate satisfactorily to the surrounding landscape and character, and must avoid where possible the loss of the best and most versatile agricultural land;

e. there would be no significant detriment to the amenity of nearby residents, the surrounding landscape, biodiversity or geodiversity, and no unacceptable effect on water quality or flooding on any watercourse in the vicinity of the site;

f. the proposal should have regard to the local road network and the associated traffic movement should not compromise highway safety or the free flow of traffic; and

g. where a retail use is proposed it must be directly related to the farm unit.

Proposals for retail development in the countryside, not related to a farm enterprise, will not be permitted and should be directed to more sustainable settlements identified within the Core Strategies and other adopted Local Plans.”

1.3.39 Policy DM44: Rights of Way states:

“Across West Suffolk gaps between settlements, including in those parishes with a number of separate greens or hamlets, and the landscape setting of settlements are essential components of their character and local distinctiveness. It is therefore important that the significance of these gaps is recognised and that new development does not dilute their contribution to maintaining the distinct form of these settlements, their landscape setting and separation from other settlements.”

1.4 Local Policy

Forest Heath Local Development Framework, Core Strategy Development Plan Document, adopted 2010

1.4.1 The Core Strategy (Ref. 11) is the principal document that provides the overall strategic vision for the future of Forest Heath to 2026, for which the prime objective of the Core Strategy is to deliver sustainable development in Forest Heath and that:

“There is no renewable energy contributing to the National Grid currently being produced within the District.”

1.4.2 Environmental Spatial Objectives include:

“To conserve and enhance the many habitats and landscapes of international, national and local importance within Forest Heath and improve the rich biodiversity of the whole District (ENV1);

To promote a diverse range of renewable energy schemes and more energy efficient developments whilst protecting our landscapes and quality of life (ENV3); and

To ensure that all new development exhibits a high standard of design and architectural quality that respects and enhances the distinctive landscapes and townscapes of Forest Heath’s towns and villages (ENV4).”

1.4.3 Policy CS2: Natural Environment states:

“Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures, Links between areas will also be sought. Measures will include:

- minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network;
- promotion of Green Infrastructure enhancement and/or provision on all new developments; and
- using Landscape Character Assessment (LCA) to inform development decisions within the District.”

1.4.4 Policy CS3: Landscape Character and the Historic Environment states:

“The quality, character, diversity and local distinctiveness of the District’s landscape and historic environment shall be protected, conserved and, where possible, enhanced.

Proposals for development will take into account the local distinctiveness and sensitivity to change of distinctive landscape character types, and historic assets and their settings. Landscape types are described in the Forest Heath Landscape Character Assessment (LCA).

The Landscape Character Assessment will inform detailed assessment of individual proposals. All schemes should protect and seek to enhance overall

landscape character, taking account of the key characteristics and distinctiveness of the landscape and the landscape setting of settlements.”

1.4.5 Policy CS5: Design Quality and Local Distinctiveness states:

“All new development should be designed to a high quality and reinforce local distinctiveness. Design that does not demonstrate it has regard to local context and fails to enhance the character, appearance and environmental quality of an area will not be acceptable. Innovative design addressing sustainable design principles will be encouraged, if not detrimental to the character of the area.

Regard should be taken of current good practice concerning design, and any local design guidance adopted by the Council.”

Forest Heath District Council, Accessible Natural Greenspace Study (2017)

1.4.6 The Study (Ref. 12) provide evidence on appropriate accessible open space that will support the planned growth in the district.

1.4.7 Opportunities for Red Lodge include:

“Opportunities to provide sustainable routes to Mildenhall and to Kennet station should be explored;

Any development along the A11 should have regard to the issues associated with the road and its impact on residential amenity and should take the approach of providing an easement which could be used to provide pedestrian access with the view to linking the north of Red Lodge to the River Kennet valley;

All opportunities to provide public access and connectivity should be explored including village walks and also focusing on the River Kennet potentially providing links to Kennet and Kentford in the south. There is an existing link to Freckenham in the north-west.”

1.5 Neighborhood Policy

Fordham Neighbourhood Plan, 2016-2036

1.5.1 The Fordham Neighbourhood Plan (Ref. 13) sets out a local blueprint for how Fordham should develop sustainably in the best interest of the village, in the context of the wider Local Plan.

1.5.2 In respect of landscape, FNP paragraph 2.35 notes:

“Around Fordham the area can be characterised as flat or lightly undulating arable fields, lined with hedgerows and punctuated by copses. This often results in big sky views with depth and interest being provided by trees, woodlands, or man-made structures such as barns, telegraph poles, pylons or the water tower to the north of the village. There is a greater amount of undulation to the south east of the village towards Chippenham, providing a variety of landscapes around the village.”

1.5.3 The ‘Vision’ for Fordham includes:

“Fordham will maintain its distinct identity – its rural, green and leafy setting will be preserved, including woodland open areas both in and outside of the village, maintaining visual and physical separation from Soham and other nearby villages, and through encouraging the retention of a tight village nucleus, avoiding further ribbon development.

Access to the countryside along the many public rights of way will be preserved and wherever possible enhanced ensuring that the close relationship between the village and the countryside is preserved. This includes ensuring the important rural views from and near to the village remain open and that wildlife and their habitats are protected.”

1.5.4 The ‘Objectives’ include:

“To preserve the rural setting of the village and to ensure that access to the countryside and important rural views and open areas are maintained;

To protect local wildlife and habitats and enhance the green infrastructure in and around Fordham;

To ensure that people can move safely and without hindrance throughout Fordham and to neighbouring areas; and

To ensure new development creates a safe and secure environment.”

1.5.5 Policy 2: Character and Design includes:

“Development proposals must deliver high quality design through:

a. Delivering a quantum of development that is appropriate for the site, taking into account the site size and shape, making the best use of the site given its context;

b. Responding to key features on the site such as trees, topography, and buildings and retaining them as part of the scheme wherever possible;

c. Responding to important characteristics of the surrounding area including views, buildings and their materials and design features, building heights, space between buildings, heritage assets, and trees;

d. Introducing visual interest from the surrounding area through the overall design, orientation and position of buildings, architectural details, landscaping and materials, particularly when viewed from publicly accessible areas;

e. Providing a mix of dwelling styles and sizes where appropriate;

f. Ensure the height of new development is reflective of the low (two storeys or fewer) character of present development in the village;

g. Including a robust green landscaping scheme that is appropriate for the site and links well with surrounding green infrastructure;

h. Providing adequate amenity space for future occupiers of the proposals;

i. Not resulting in unacceptable impacts on the amenity of occupants of neighbouring or nearby properties;

j. Providing buildings and spaces that are accessible, inclusive and safe; and

k. Using high quality materials throughout the scheme. Proposals that exhibit substandard design quality, particularly when considered against these requirements, will not be supported. Plans and supporting statements submitted with planning applications should make clear how decisions on the design of the proposal were arrived at and why they are appropriate for the context of the site. Development that exhibits outstanding or innovative design will be supported in principle, where this is appropriate for the context of the site.”

1.5.6 Paragraph 4.18 states:

“At present there is a sense of separation as you travel between these neighbouring settlements but, in many cases, development has occurred in these gaps over recent decades which has somewhat reduced this sense of separation. It is important to maintain this separation so that the distinctive identities of each settlement can be maintained.”

1.5.7 The general location of gaps is located on Map 5 in the Fordham Neighbourhood Plan and none are within the Site.

1.5.8 Policy 4: Maintaining Separation states:

“proposals located in areas between Fordham and any neighbouring settlement that would either visually or physically reduce the separation, or sense of separation, will not be supported. Any development proposals in these gaps should be accompanied by evidence of the visual impact of the proposed scheme in relation to the gap.”

1.5.9 Map 7 identifies locally important views, none of which are orientated towards the Site.

1.5.10 Policy 6: Locally Important Views states:

“Development proposals should not obstruct or detract from a Locally Important View. Any proposals that has potential to impact on these views should be accompanied by supporting information to demonstrate why the proposal will not have a negative impact on the view.”

1.6 Newmarket Neighbourhood Plan 2018-2031, 2019

1.6.1 The Newmarket Neighbourhood Plan (Ref. 14) states that the following assets could be developed in the future to ensure sustainability:

“a unique landscape setting which envelops the town, including the SSSI of the chalk grassland of Newmarket Heath and the Special Area of Conservation of the Devil’s Dyke, and the training grounds and stud farms with their boundaries of hedges and trees. Trees and tree belts form a significant part of Newmarket’s natural and urban landscapes, and the town also benefits from many well-kept roadside verges, which are maintained by the Studs and Jockey Club Estates at no expense to the public.”

1.6.2 Identified constraints in respect of future development includes:

“undeveloped land to the north-west of the town is particularly important in helping maintain a gap between Newmarket and Exning in order to avoid coalescence of the two settlements.”

- 1.6.3 Opportunity 1: to maintain, promote and increase awareness of Newmarket's key features include:
"The unique landscape surrounding the town."
- 1.6.4 Policy NKT2: Key Views sets out a number of key views, however none are towards the Site.

1.7 References

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- Ref. 7 East Cambridge Local Plan, April 2015,
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- Ref. 12 Forest Heath District Council, Accessible Natural Greenspace Study, 2017,
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- Ref. 13 Fordham Neighbourhood Plan 2016-2036,
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