Councillor Ross Piper Response

Dear Isaac

As district councillor for this ward please see below for my comment on this application. I've also attached some relevant literature, which is cited in my comment.

I completely understand the concerns of many regarding this application; however, I am in full support of the application, and I think more of the public would be too they understood the benefits of solar farms. Love or hate them, PV panels are the future. The ability to produce electricity from sunlight is truly remarkable and we need to harness this form of electricity generation as much as possible if we are to have a sustainable future. As a professional ecologist, I am also keenly interested in the benefits to biodiversity of removing lower quality agricultural land out of production.

The land in question is indeed currently used for agricultural production, however, the vast majority of the site (91.4%) is classified as Grade 3B farmland and the remainder (8.6%) is Grade 3A. Grade 3B farmland is "Moderate quality agricultural land capable of producing moderate yields of a narrow range of crops or lower yields of a wider range of crops." This is far from being superb quality farmland and getting a crop from it requires the processes that are typical of intensive agricultural and all the consequences thereof, e.g. heavy machinery, fertilisers and pesticides. The impacts of intensive agriculture on soil quality, water quality and biodiversity have been well documented.

Releasing this area from agricultural production would have a significant impact on local biodiversity. There is a growing body of evidence that well-designed and managed solar farms have a significant, positive impact on biodiversity. Studies have shown that solar farms support a greater variety of plant species than equivalent farm fields (see Montag *et al.* 2016). More plant species results in more insect species, which, in turn, benefits larger animals, such as mammals and birds. As the soil is not disturbed each year it will have a chance to recover and there will be no fertilisers and pesticides going into the soil and gradually making their way into surrounding waterways. A huge variety of plant, insect, bird and mammal species that cannot survive on intensively farmed land will be able to survive and thrive in the sward around the PV panels and in the created habitats at the borders and through the PV arrays.

I urge the developers to read, take on board and implement the guidance in *Realising the Biodiversity Potential of Solar Farms* (attached here), which provides specific recommendations for habitat creation, management and biodiversity monitoring. The recommendations in this document should be considered as enforceable mitigation. The developers also need to follow the recommendations laid out by Suffolk Wildlife Trust in response to the application. There also needs to be specific mitigation for aquatic insects as they mistake PV panels for waterbodies. This is achieved by placing non-polarising white borders and white grates on the PV panels (see Horvath et al. 2010, Conservation Biology,24[6],1644-1653). In addition, a 2016 report entitled *The Effects of Solar Farms on Local Biodiversity: a Comparative Study* by Montag et al. provides data on the biodiversity benefits of solar farms (also attached here).

With the creation of new habitats we must also take advantage of this development to improve habitat connectivity at the landscape scale. We must also insist that rights of way are protected and enhanced within the development.

I completely understand that the proposal is a significant, visual change in land use, but I urge local residents to support it. Not only will it produce an abundance of clean electricity, but it will also greatly benefit the soil and biodiversity if well designed and managed. Crucially, if conditions in the future necessitate more farmland then the PV panels can be removed and the recharged land will be ready for production once more.

Thanks and best wishes.

Ross

Dr Ross Piper

Mid Suffolk District Council
Renewable and Low Carbon Energy Position Statement

This statement sets out the Council's position on renewable and low carbon energy developments that are considered through planning applications determined by the Councils, and those applications where the Councils are a consultee, for example in the case of Nationally Significant Infrastructure Projects (NSIPs).

Further information on large scale energy and NSIPs in our Districts can be found here.

Development plan policy will be set out in Policy LP25 of the Babergh and Mid Suffolk Joint Local Plan Part 1 on Energy Sources, Storage and Distribution (see appendix). The Policy sets out the Council's position for the determination of planning applications for these types of development. At the time of writing, the Joint Local Plan Part 1 is anticipated to be adopted in November 2023.

This position statement does not form part of the development plan but sets out what the Council would strongly like to see achieved relating to some aspects of renewable and low carbon energy development in our Districts, alongside the requirements of policy LP25.

This is not a definitive list of all material planning considerations relevant to such developments.

Climate Change
Mid Suffolk District Council is part of the Suffolk Climate Change Partnership (SCCP) and declared a climate emergency and developed a Carbon Reduction Management Plan. Further information regarding climate change can be viewed on the Mid Suffolk District Council website.

National policy clearly sets out measures to reduce greenhouse gas emissions with policies that seek to encourage renewable energy developments where they are acceptable. Within the National Planning Policy Framework (NPPF), the National Policy Statement for Energy (EN-1) and its draft replacement, the recent Energy White Paper – Powering Net Zero Future (December 2020) and the Net Zero Strategy: Build Back Greener (2021) there is a strong commitment to promoting the development of renewable energy. One of the key policies of the Net Zero Strategy is for the UK to be powered entirely by clean electricity by 2035, with a key policy of the provision of more solar renewable energy. Whilst some of these policies relate to nationally significant infrastructure projects above 50MW, the direction of travel is a material consideration for planning applications the Councils determine.

Any contributions to the provision of clean renewable energy would attract substantial weight in the balancing of any planning decision by the Councils.

Renewable and Low Carbon Energy development
There are many renewable and low carbon energy development projects coming forward in the District, providing a source of energy that is less harmful than fossil fuels. There are clearly wider environmental and social benefits of providing energy

security but there are also challenges when considering these types of developments. Whilst there are other material planning considerations, this position statement focuses on the following issues:

- The loss of best and most versatile agricultural land;
- The potential harm to the diverse character of the landscape; and
- Concerns and fears being expressed by some of our communities about harmful impacts.

Agricultural Land

The production of food through agriculture is an intrinsic part of the identity of much of our District, with strong traditions of agricultural land use. It is recognised however that food production is a complex matter with food being both imported and exported, with no certainty that an agricultural field would be used to grow food for consumption in the UK. It should be noted that there are also other non-food products grown on our agricultural land including biofuels.

It is recognised that there is more higher-grade agricultural land in our District rather than lower Grade 4 and 5, and also that the total farmed agricultural land according to DEFRA is:

- Mid Suffolk 71,319ha

The Council places great importance on preserving productive agricultural land including land categorised under Grade 3b of Agricultural Land Classification. However, the position set out in the NPPF is clear in that only Grade 1, 2 and 3a fall into the Best and Most Versatile Agricultural Land Classification. There has been no change in national policy and weight cannot reasonably be placed on the loss of Grade 3b, 4 or 5 agricultural land in this regard.

However, the planning reforms published by the Department of Housing, Levelling Up and Communities have identified a consultation on changes to make sure the food production value of land is reflected in planning decisions. Whilst the Council awaits that consultation, it is keen to make clear the importance it places on protecting productive agricultural land. Where these circumstances apply it strongly encourages any development bringing forward renewable or low carbon energy developments to consider our position and avoid loss to such development.

The Council also strongly encourages installing solar panels on existing and new buildings, whilst recognising that this is largely directed by national Building Regulations.

Landscape value

The landscape in our District has an intrinsic landscape value, as well as a cultural and often heritage importance. The Councils strongly recommend that these are given utmost consideration when selecting a site for renewable or low carbon energy development, and when considering the design, siting and layout of any development within that site.

Our landscapes are of great importance and value to our residents, businesses, visitors and our tourism offer. Any harmful effects to the landscape character and visual receptors of these areas including cumulative impacts, should be carefully considered when determining planning applications.

It is recognised that landscape and heritage impacts will be considered alongside the benefits that developments of this type would deliver, along with any other relevant legislative or policy considerations required for the planning balance for any decision to be made. We will seek applicants to minimise any harmful effects to visual receptors (e.g. Public Rights of Way, open access land and other public viewpoints).

It is widely perceived that the character of rural villages could be seriously compromised if settlements are surrounded or dominated by fields of solar pv panels. Such approaches would also create a visual monoculture which is likely to be harmful to landscape character.

Our Communities

We strongly recommend that applicants engage on these matters with local communities at the earliest possible stage of development. In doing so we would encourage developers to set out how such developments could provide benefits for local communities as well as the steps needed to address any concerns.

These could include financial and non-financial obligations secured through the planning process to make a development acceptable under the Town and Country Planning Act 1990 (such as planning conditions and Section 106 legal agreements) but also community benefits that can be secured through Section 111 agreements under the Local Government Act 1972.

Applicants are encouraged to engage with affected communities early in the process to see if there are any identified community aspirations for investment identified through Neighbourhood Plans, Parish Infrastructure Investment Plans or other Parish Plans. Even in the absence of these, any priorities for our communities that could be funded through contributions under Section 111 agreements should be considered.

Section 111 agreements can secure sums of money, which are typically administered by Councils and which are then allocated on to local community projects. Money can be secured provided it can demonstrate it will ‘facilitate, or is conducive or incidental to the discharge of any of their functions’.

Community energy schemes are also encouraged, brought forward in collaboration with our communities to provide clean energy.

Further information can be found at Green Suffolk.

In summary

This position statement notes the valuable contribution renewable and low carbon energy sources make to national energy security and we will reflect on any Ministerial Statements or national policy guidance issued on such developments as and when released.

It is important that any proposals for renewable and low carbon energy development reflect on the concerns around agricultural land, landscape and community benefit and address those matters explicitly in any submissions.