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Project:
THE NEIGHBOURHOOD SERVICES
COMPANY - INSTALLATION OF A 2848
PANEL SOLAR FARM AT LARKINS FARM,
GELLINGS LANE, KNOWSLEY. L34 9EN

By:
MCC

Date:
11/9/2023
Revision:

**DESIGN AND ACCESS STATEMENT TO SUPPORT A PLANNING APPLICATION THAT PROPOSES THE INSTALLATION
OF A 2848 PANEL SOLAR FARM AT LARKINS FARM, GELLINGS LANE, KNOWSLEY. L34 9EN**

PREPARED BY MR MIKE CARR MSc MRTPI

MAT DESIGN LIMITED

PROPOSED DEVELOPMENT: -

INSTALLATION OF A 2848 PANEL SOLAR FARM, ORGANIC
BOUNDARY FENCING, 1No SUB STATION, 1No
TRANSFORMER BUILDING, SITE SERVICE ACCESS,
ASSOCIATED LANDSCAPING AND BIO-DIVERSITY
IMPROVEMENTS (NET GAIN)

PREPARED ON BEHALF OF:-

THE NEIGHBOURHOOD SERVICES COMPANY

DATE:

SEPTEMBER 2023

1. INTRODUCTION

This Design & Access Statement has been prepared by MAT Design Limited on behalf of The Neighbourhood Services Company and forms part of a planning application submission to Knowsley Metropolitan and should be considered in conjunction with the supporting plans, statements and supporting information.

Overall, this statement will seek to identify all the relevant material planning considerations, along with national and local planning policy frameworks that are applicable to the development, then seek to assess all of the principal planning issues attached to the consideration of the planning application. In particular, this statement will consider the following matters:-

- Whether the proposals accord with the National Planning Policy Framework (NPPF) 2023 and represent a sustainable form of development and,
- Whether the proposals are consistent with the adopted development plan, which in this case is made up of Knowsley Local Plan Core Strategy (2016).

2. THE NATIONAL & LOCAL PLANNING POLICY FRAMEWORK ATTACHED TO THE CONSIDERATION OF THIS PLANNING APPLICATION

The National Planning Policy Framework (NPPF 2023) sets out the Government's economic, environmental and social planning policies for England, and these policies articulate the Government's vision for sustainable development which should be interpreted and applied in determining planning applications.

The National Planning Practice Guidance (PPG) adds further context to the NPPF and it is intended that the two documents should be read together, thereby achieving a sustainable form of development as described in paragraph 8 of the NPPF. In addition, the National Design Guide provide further advice on what elements are considered to make up good design within the setting of any particular site, whether it be urban or rural.

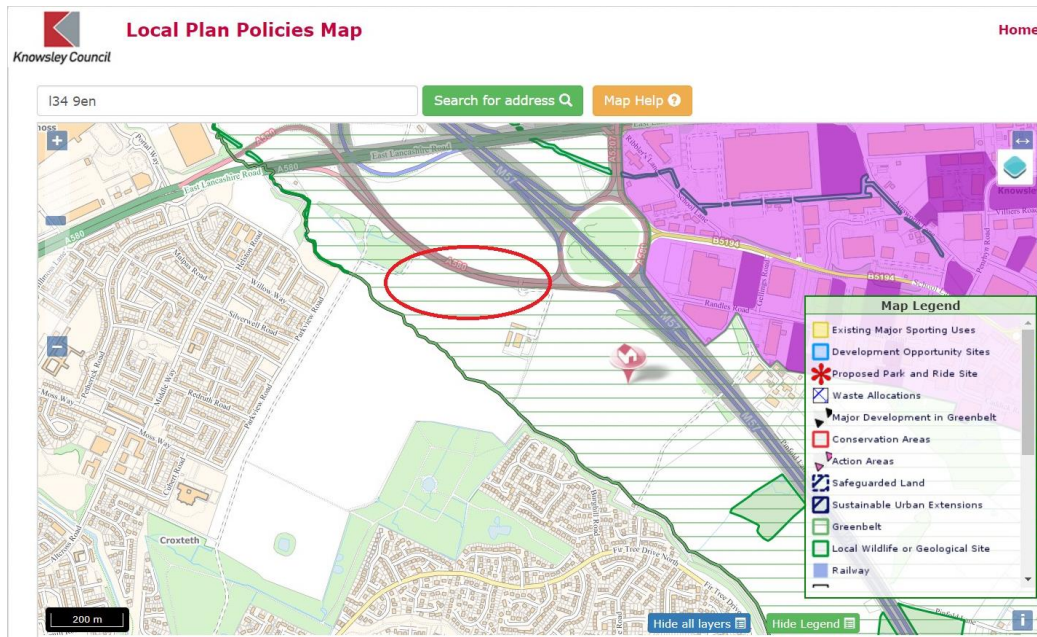
Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

In this particular case, given the type, size and scale of the development, the principle policies that provide the framework for the consideration of this planning application are:-

- NPPF Section 13 - Protecting Green Belt Land – Paragraphs 147, 148 and 151;
- NPPF Section 14 - Meeting the challenge of climate change, flooding and coastal change – Paragraphs 152 & 153 – 158 and;
- Knowsley Local Plan Core Strategy Policy CS23 - Renewable and Low Carbon Infrastructure.

3. THE APPLICATION SITE LAND USE ALLOCATION

The application site is 2 hectare parcel of land, which is identified as being within the green belt on the Knowsley Local Plan Proposals Map. In addition, we would also highlight that the site is not restricted by other land use planning constraints such as flood risk, protected trees within or heritage assets.



The application site edged red – Source – Knowsley Local Plan Proposals Map

4. THE SITE AND ITS SURROUNDS

The application site is a parcel of grade 3b agricultural land that is sandwiched between the settlement boundaries of Croxteth & Gilmoor (within the Liverpool City Borough) to the south and west, whilst the main NSC commercial hub and A580 link from the M57 form the sites northern and eastern boundaries

Access and egress into the site is taken directly from the A580/M57 slip road and onto access track that links to the site. Ample visibility splays are available at the track junction with the A580/M57 slip road

In terms of the setting of the site in the wider area, the application site sits approximately 300m from the nearest settlement boundary, and is located close to local services, schools, medical facilities and public transport. As such, the development site can be described as being located in a sustainable location for purposes attached to the consideration of this planning application.

In terms of the agricultural quality of the land, we would highlight the following material considerations:-

- Government guidance on assessing development proposals on agricultural land identifies that grade 3b land, is land with moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting or the level of yield;

- In this case, the land has been used for barleycorn crop, as varieties of crops are limited that can grow in the soil;
- 220kg of fertiliser per hectare has been used over time to make the soil more for crop growing, meaning that an expensive and intensive headland management system has to be used to prevent the higher levels of nutrient run-off from the spreading to the wetland area.

5. THE PROPOSED DEVELOPMENT

The proposed redevelopment of land would involve the following elements:-

- The installation of a 2848 south facing solar panels and mounting systems, which would provide 1424Kwh of green energy into the national/local grid;
- The erection of a 2m high paladin "living fence" to the northern boundary of the site to promote habitats for different life streams around the fence line.;
- The erection of a sub-station building to the north west corner of the site, close to the telecommunications mast;
- The erection of a transformer building to the north west corner of the site, close to the telecommunications mast;
- The formation of 2No gravel access tracks to allow maintenance of the solar array and
- The planting of a wildflower meadow to promote wildlife and defensive planting to the south of the solar arrays
- The completion of a biodiversity net-gain assessment (already carried out), that is projected to achieve over 10% net-gain in Area and Linear units, which is the minimum threshold expected to be mandated by the forthcoming Environment Bill;
- The habitat creation and enhancement proposed can be delivered through a Biodiversity Management Plan (BMP) detailing landscaping, management and biodiversity provision prescriptions, which can be secured by planning condition.

6. PLANS AND INFORMATION PRESENTED TO SUPPORT THIS PLANNING APPLICATION

The following plans and supporting information have been prepared to support the consideration of this The Planning Statement

- Site Location Plan;
- Site Location Plan;
- Proposed Site Plan And General Arrangements;

- Flood Risk Assessment;
- Ecological Appraisal;
- GCN Survey;
- Bio-Diversity Net Gain Report;
- The Planning Statement;
- The Applicant Company Profile Statement & Associated Very Special Circumstances;
- Sub-Station Building Details;
- Transformer Building Details;
- Solar Panel Field Mounting System and;
- Solar Panel Data Sheet And Design.

7. PLANNING HISTORY

There are no current planning applications that we are aware of, which would affect the consideration of this planning application.

8. PLANNING APPRAISAL

Having regard to the planning policy context set out within the previous sections of this statement, the key planning matters requiring consideration in the determination of this planning application include:-

- Achieving Sustainable Development;
- The Harm to the Openness of the Green Belt;
- Meeting the Challenge of Climate Change, Flooding and Coastal Change;
- Flood Risk & Drainage;
- Ecology and Bio-Diversity Gain;
- Accessibility;
- Car Parking;
- Heritage Matters;
- Trees;
- Landscaping;
- Planning Conditions and;
- Very Special Circumstances (VSC).

Achieving Sustainable Development

The proposed development would contribute to achieving sustainable development and will deliver a range of economic, social and environmental benefits:-

Economic benefits will be associated with the scheme through employment associated with the proposed development, and the positive contribution in terms of the purchase of materials/products associated with the development, along with convenience sales nearby.

Social benefits will be delivered through the new development and the generation of renewable energy to support the transition to a low carbon future in a changing climate;

Environmental benefits will be secured through the environmental benefits associated with increased production of energy from renewable sources, along with the wider environmental benefits and bio-diversity net gain on and around the application site

On the basis of the above, we consider that the proposed development would provide a series of positive economic, social and environmental benefits and therefore constitutes sustainable development. As such the development complies with the provisions of the NPPF, along with the relevant Local Plan Policies.

The Harm to the Openness of the Green Belt

Paragraph 147 of the 2023 (NPPF) identifies that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”, whilst paragraph 148 identifies that “when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

In terms of the delivery of renewable energy projects, and unlike other types of inappropriate development in the green belt, NPPF paragraph 151 provides some clarity in supporting renewable energy projects in the green belt, and advises that “when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development.

In such cases developers will need to demonstrate VSC if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources”.

Taking the provisions of paragraph 151 into account, we consider that there are significant and evidence based VSC associated with the delivery of 1424Kwh renewable energy and the wider environmental benefits associated with bio-diversity net gain.

We consider that when these VSC are positively considered and balanced against the national and local planning policy framework, the VSC associated with the merits of this development would clearly outweigh the harm to the openness of the green belt.

The site and project specific VSC are listed later in this statement.

Meeting the Challenge of Climate Change, Flooding and Coastal Change;

NPPF paragraph 152 sets out that “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”.

Furthermore, and in this particular case, paragraph 158 identifies that “when determining planning applications for renewable and low carbon development, local planning authorities should-

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions;
- b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Flood Risk & Drainage - The Environment Agency’s Flood Risk mapping system (see image below) shows it is at low risk of surface water flooding (Flood Zone 1). As such, and for the purposes of this planning application, there are no flood risk issues associated with the site.



Map Source – The UK.GOV Flood Mapping Service For Planning

However, and given that the development site exceeds 1 hectare (ha) in flood zone 1, a full Flood Risk Assessment (FRA) has been prepared to support the consideration of this application.

The FRA, which has been prepared by UK Flood Risk Consultants, set out all of the relevant flood risk material considerations, and should be read in conjunction with this planning statement, other supporting statements and the plan pack that makes up this application.

In terms of the findings in the FRA, section 8 identifies that the proposed development is categorised as 'less vulnerable' and is located in Flood Zone 1. As such, the development is therefore appropriate at this location.

The nearest Main River from the site is the Knowlsey Brook which runs adjacent to the southern site boundary, and is located outside of its floodplain. According to the information available from the SFRA and the Environment Agency, there were no records of flooding events at the site.

The Environment Agency's Flood Maps show that the site lies within the Flood Zone 1 (low probability flooding). Flood Zone 1 is an area where flooding from rivers is very unlikely. There is less than a 1 in 1000 chance of flooding occurring in any one given year (i.e. a less than 0.1% annual probability of flooding). The Environment Agency's flood risk map indicates that the site is located outside of the flood risk zone.

The overall risk of surface water flooding to the site is low. The flood risk from other sources including underground water, sewer and reservoir is low.

The FRA concludes that the development will not give rise to backwater affects or divert water towards other properties. This report demonstrates that the proposal will be safe, in terms of flood risk, for its design life and will not increase the flood risk elsewhere.

Ecology and Bio-Diversity Gain

As part of the preparation of this planning application, and following pre-application engagement with the LPA through the Environmental Impact Assessment process, we commissioned Tyrer's Ecological Consultants to carry out a Preliminary Ecological Appraisal, carried out Great Crested Newt (GCN) Surveys and formulated a Biodiversity Net-gain Assessment.

In terms of the reports, the following conclusions and recommendations were reached:-

- **The Preliminary Ecological Appraisal** – See section 8 of the attached report;
- **The Great Crested Newt (GCN) Surveys** - The combined survey effort has found no evidence of great crested newt in any of the four ponds surveyed using traditional survey methods. As such, no licence requirements or specific intervention measures for great crested newts are recommended and;
- **The Biodiversity Net-gain Assessment** - Following the completion of a biodiversity net-gain assessment, the scheme is projected to achieve over 10% net-gain in Area and Linear units, which is the minimum threshold expected to be mandated by the forthcoming Environment Bill.

The habitat creation and enhancement proposed can be delivered through a Biodiversity Management Plan (BMP) detailing landscaping, management and biodiversity provision prescriptions; this document can be secured by planning condition.

Accessibility

The site is highly accessible and is served by public transport that travels through the area and links the site to the wider Merseyside Region.

Transportation, Highways & Car Parking

Highway access will utilise the existing site opening onto the A580/M57 slip road, which has visibility splays the look at least 150m in each direction. In addition, we would highlight that this junction is already used by large

and small commercial vehicles and employee cars. As such, and given the size, type and scale of the development that is proposed, there would only be a modest increase in the use of this junction.

Paragraphs 110 and 111 of the 2021 NPPF confirms that development should only be prevented or refused on highways grounds if a safe and suitable access to the site can be achieved for all users, there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Bearing in mind that and in this particular case, vehicle movements associated with the replacement dwelling would have no impact on the local network and as we consider that the proposed development would be compliant with the provisions of the NPPF.

Boundary Treatments Landscaping

This planning application proposes the erection a 2m high paladin “living fence” to the northern boundary of the site to promote habitats for different life streams around the fence line. We have provided a detailed planting statement with the application and we are happy to work with the LPA to secure further landscaping improvements by working positively the LPA and the introduction of the proposed Biodiversity Management Plan (BMP).

Trees - There are no trees that would be affected by the proposed development. We are happy to provide trees on the site via suitably worded landscaping condition.

Heritage Matters – The site is not located within or near to any heritage assets.

Planning Conditions & Obligations

NPPF paragraph 55 identifies that Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

In addition, paragraph 57 sets out that Planning obligations must only be sought where they meet all of the following tests: -

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

We can confirm that we are happy to work with the LPA to secure any reasonably related planning conditions and/or a suitable and viable planning obligation to ensure that the proposed development provides the green power generation and environmental enhancements that are proposed.

Very Special Circumstances

- NPPF paragraph 151 advises that VSC that are associated with renewable energy projects may include the wider environmental benefits associated with increased production of energy from renewable sources;
- NPPF paragraph 152 sets out that the planning system ***should support the transition to a low carbon future***;
- NPPF paragraph 158 sets out that LPA's should not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that ***even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions***;
- NPPF paragraph 158 sets out that LPA's ***should approve the application if its impacts are (or can be made) acceptable***. Planning conditions and/or planning obligations can be used if necessary;
- ***Positive economic benefits*** associated with the scheme through employment associated with the proposed development, and the positive contribution in terms of the purchase of materials/products associated with the development, along with convenience sales nearby;
- ***Positive social benefits would be delivered through the new development and the generation of renewable energy to support the transition to a low carbon future in a changing climate***;
- ***Positive environmental benefits*** will be secured through the environmental benefits associated with increased production of energy from renewable sources, along with the wider environmental benefits and bio-diversity net gain on and around the application site;
- ***The proposed development would provide environmental and bio-diversity gain*** through the installation of the living boundary fence, the formation of the wildflower meadow and the wider net gain that is set out in the Biodiversity Net-gain Assessment;
- As set out in section 5 (Conclusions & Recommendations) of the Biodiversity Net-gain Assessment, the habitat creation and enhancement programme that is proposed, can be delivered through ***a Biodiversity Management***

Plan (BMP) detailing landscaping, management and biodiversity provision prescriptions. This can be secured by planning condition, which is supported by NPPF paragraph 158;

- ***NSC has an established track record of not for profit community involvement and stakeholder engagement;***
- ***NSC has an established track record in the delivery of renewable energy projects in Merseyside;***
- ***NSC provides local community employment opportunities;***
- ***NSC have commissioned and completed various community based projects for the benefit of local people;***
- ***NSC have commissioned and completed environmental improvement projects for the benefit wildlife and bio-diversity improvements at and around the site;***
- ***NSC have formed educational environmental learning and training for the community;***
- ***NSC would provide further employment and local educational opportunities as part of the new solar farm project;***
- ***NSC would add to its community engagement programme through a new working agricultural farm model, to focus on sustainable farming with the solar farm and turbines.***
- ***NSC would enhance its relationship with local schools experiencing the wetlands, woods and renewable energy;***
- ***NSC have already delivered 6 renewable energy projects that provide 188Kwh to the national/local grid;***
- ***Overall, NSC would provide a further 1424Kwh of energy to the to the national/local grid that would be a sustainable form of development, by delivering renewable and low carbon energy and wider environmental benefits.***

PLANNING CONCLUSIONS

To summarise this planning application, the supporting plans & planning statements, whilst taking all relevant and material planning considerations into account, we consider that the VSC that are presented to support the

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inappropriate elements of this development, clearly and outweigh the harm to the openness of the green belt in this particular case.

Taking these factors into account, we consider that the proposed development would with the relevant provisions of the NPPF 2023 and Knowsley Local Plan Core Strategy. On this basis, we would ask Knowsley Council to assess this planning application positively.

We look forward to working with the Council in progressing this planning application towards a positive determination and we are happy to agree and suitable and reasonable amendments to the proposed development, and/or consider planning conditions that that are consistent with paragraph 55 of the 2023 NPPF.