Planning, Design and Access Statement Addendum

January 2024

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Issue / revision		Prepared by	Zarina Ali
Reference	277101	Signature	ZA
This document is issued for		Date	16 January 2024
[ ] Information	[ ] Approval	Checked by	Neil Trollope
[ ] Comment	[x] Submission	Signature	NT
Comments		Date	16 January 2024
		Authorised by	Neil Trollope
		Signature	NT
		Date	16 January 2024
		Please return by	N/A

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1.0 Introduction

1.1 This Planning, Design and Access Statement Addendum has been prepared to provide additional commentary on the proposed solar farm and associated infrastructure for which full planning permission is sought (LPA ref. 2023/0845).

1.2 This document should be read alongside the Planning, Design and Access Statement (dated September 2023). Together, the documents provide the necessary information to justify the proposed solar farm and its use to support an established business and to support the UK's transition to a low carbon economy.

Critical National Need to Transition to Low Carbon Economy

National Drivers

1.3 As a source of renewable energy, solar power has an important role to play in combating climate change by helping to reduce the extraction and combustion of non-renewable fossil fuels and generation of associated CO_2 emissions, providing energy security, and meeting growing energy demands.

1.4 The Government has set out a range of commitments, objectives and goals which are considered relevant to the development and are a material consideration. Significantly, since planning application reference 2023/0845 was submitted, in November 2023 the Chancellor's Autumn Statement 2023 provided a significant focus on the renewable energy sector and measures to transform the delivery of renewable energy infrastructure in the UK. Alongside the Autumn Statement, the Government published new National Policy Statements (NPSs) for energy on 22nd November 2023. These include the Overarching National Policy Statement for Energy (EN-1) and Renewable Energy Infrastructure (EN-3), which come into force in early 2024. Although the guidance is targeted at Nationally Significant Infrastructure Projects (NSIPs), paragraph 5 of the NPPF states "*NPSs form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications"*. The significance of the Autumn Statement and NPSs are addressed in further detail below.

<u>UK Legislation and Policy Context – Towards Zero Carbon by 2050</u>

1.5 In June 2019, the UK became the first major economy to legislate for a 2050 net zero greenhouse gases (GHG) emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

1.6 On 12 December 2020, the UK published its Nationally Determined Contributions (NDC) to reduce GHG emissions by at least 68% from 1990 levels by 2030.

1.7 Aligned with the publication of the UK's NDC, the Energy White Paper was published on 14 December 2020. It outlines the Government's strategy and policies for achieving net-zero carbon emissions by 2050, promoting renewable energy sources, enhancing energy efficiency, and fostering innovation in clean technologies. It emphasises the transition to a low-carbon economy, addressing climate change, and ensuring a secure and affordable energy supply.

1.8 In April 2021, the Government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78% by 2035 compared to 1990 levels.

1.9 On 20 September 2023, the Government "recommitted" the UK to Net Zero by 2050[1].

Autumn Statement 2023: National Policy Statements (Energy)

1.10 The Chancellor's Autumn Statement 2023 provided a range of measures to transform the delivery of renewable energy infrastructure, including:

- Permanent extension of the Full Expenses regime, with qualifying plant and machinery continuing to qualify for 100% or 50% tax allowances in the year of acquisition
- A £960 million fund for Green Industries Growth Accelerator
- An Advanced Manufacturing Plan for growth to include green industries
- Plans to tackle the significant planning and grid connection issues for renewable energy, including new policy papers for:
    - Get Britain Building Again
    - Transmission Acceleration Action Plan: Government Response to the Electricity Networks Commissioners Report on Accelerating Electricity Transmission Network Build
    - Connections Action Plan: Speeding up Connections to the Electricity Grid Network Across Britain

1.11 Alongside the Autumn Statement, on 22nd November 2023, the Government published NPS EN-1 and EN-3, which provide substantial support for the development of low carbon and renewable energy infrastructure. They are discussed in further detail below.

National Policy Statement EN-1 (Overarching)

1.12 The overarching policy message in EN-1 is as follows (our emphasis added):

"*2.3.3 Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.*

2.3.4 Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments ***and small-scale developments determined at a local level.*** *This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains.*

[1] Prime Minister's Office, 10 Downing Street and The Rt Hon Rishi Sunak MP, published 20 September 2023

2.3.5 The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources."

1.13 Paragraphs 3.3.20 onwards cover the role of wind and solar energy, with these being the lowest cost for generating electricity. It states that the Government's analysis *"shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*. Paragraphs 3.3.25 to 3.3.31 set out the important role of electricity storage, which is due to play a key role in achieving net zero and providing flexibility in the energy system.

1.14 In Paragraph 4.2.4, the Government concludes that there *"is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure"*. Whist a CNP relates specifically to NSIPs, the overarching message is very clear that the provision of renewable low carbon energy infrastructure is a national priority and thereby a material consideration of substantial weight for Town and Country Planning Act (TCPA) planning applications.

1.15 Of further significance are paragraphs 4.2.15 to 4.2.17, which state that, in all but exceptional circumstances, for CNP renewable energy proposals that are judged to cause harm to national designations, such as a SSSI, AONB, designated landscape area or designated heritage asset, the Secretary of Statement (SoS) will pre-judge the provision of CNP to outweigh harm to these. Given the status of NPS EN-1, this planning balance is also likely to be a material consideration for renewable energy projects that are not NSIPs.

National Policy Statement EN-3 (Renewable Energy)

1.16 Section 2.10 of the statement covers solar photovoltaic generation and acknowledges that the Government is committed to sustained growth in solar capacity to ensure net zero emissions are reached by 2050. The policy statement acknowledges that the British Energy Security Strategy[2] expects a five-fold increase in roof and ground solar deployment by 2035. Furthermore, the Powering Up Britain: Energy Security Plan[3] emphasises the Government's pursuit of large-scale ground-mounted solar deployment in the UK, focusing on brownfield, industrial, and low to medium-grade agricultural land. The plan highlights the potential for synergy between solar energy and farming, promoting financial and environmental support, as well as shared land use.

Other National Drivers

<u>Government Energy-related Plans and Strategies</u>

1.17 In addition to the key documents highlighted above, the Government has published a series of plans and strategies to support the delivery of new renewable energy infrastructure, including:

[2] See https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy
[3] Co-location could be an application solely seeking consent for solar, but co-locating with an existing use / function; or an application seeking consent for solar and other functions.

- Ten Point Plan for a Green Industrial Revolution (November 2020)
- Net Zero Strategy: Build Back Greener (October 2021)
- British Energy Security Strategy (April 2022)
- Powering Up Britain: Energy Security Plan (March 2023)

1.18 The British Energy Security Strategy 2022 targets a fivefold increase in solar deployment by 2035 to achieve a target of 70GW with further deployment to 2050 such that the UK's electricity system predominantly comprises of wind and solar. In the strategy, the Government outlines its intention to consult on amending planning rules to strengthen policy in favour of development of ground-mounted solar on non-protected land, whilst ensuring communities have opportunities to engage and environmental protections remain in place. It continues to support large scale solar projects on greenfield sites, subject to appropriate design and consideration of potential impacts.

1.19 The Powering Up Britain: Energy Security Plan provides a commitment to establish a solar government-industry taskforce and to publish a solar roadmap setting out a clear step by step deployment trajectory to achieve 70GW of solar by 2035. The plan reaffirms that ground-mounted solar is one of the cheapest forms of electricity generation and is readily deployable at scale. The Government seeks large scale ground-mounted solar deployment the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. Solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land. The plan states that the Government considers that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. This is now reflected in the revised NPSs.

Climate Change Committee

1.20 The Climate Change Committee (CCC) is an independent, statutory body established under the Climate Change Act 2008. Its purpose is to advise the UK and devolved governments on emissions targets and to report to parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change. The CCC publishes annual progress reports on the UK's progress in reducing emissions and adapting to climate change. In its latest report, Progress in Reducing Emissions: 2023 Report to Parliament (June, 2023), the CCC states that confidence in the UK meeting its medium-term targets for carbon reduction has decreased. The report notes that whilst renewable electricity capacity increased in 2022 this was not at the rate required to meet government targets, particularly for solar deployment and hence solar PV is considered to be significantly off track.

National Infrastructure Commission

1.21 The National Infrastructure Commission (NIC) provides impartial, expert advice on major long-term infrastructure challenges. It carries out in-depth studies into the UK's major infrastructure needs and makes recommendations to the Government. The NIC's Second National Infrastructure Assessment (October, 2023)[4] provides an assessment of the UK's infrastructure needs to 2055 and beyond, providing a 30-year plan for a low carbon and resilient economy that supports economic growth and protects the natural environment. The first

[4] https://nic.org.uk/studies-reports/national-infrastructure-assessment/second-nia/

assessment was undertaken in 2018 and the second assessment acknowledges that significant progress in boosting renewable energy has been made. However, it highlights that significant investment is necessary to deliver a fully renewable electricity network that provides energy security. Its key recommendations in this regard are:

- Accelerate deployment of offshore wind, onshore wind and solar power generation
- Scale up the grid to cope with increased demand, and transform the planning system to ensure it is built on time
- A new contingency energy reserve to boost Britain's resilience to external shocks

National Planning Policy

1.22 In addition to the revised NPSs, there is general recognition that the planning system has a critical role to play in delivering the vision for renewable energy. The NPPF places considerable emphasis on local planning authorities delivering renewable energy schemes. The PPG (Reference-ID: 5-001-20140306) states that, increasing the amount of energy produced from renewable and low carbon technologies, will help ensure the UK has a secure energy supply and reduce greenhouse gas emissions.

1.23 It is within this context that the applicant seeks permission to deliver a scheme that aligns with the UK's energy vision and maximises wider economic and environmental benefits.

Commentary

1.24 Transitioning to renewable energy production will significantly help the UK progress towards net zero by 2050. In considering how to reduce carbon emissions across the economy, switching to low carbon energy is one of the most important changes businesses can make.

1.25 Significant reductions in greenhouse gas emissions in the UK have already significantly reduced and in 2022 were 49.7% lower than they were in 1990[5]. In December 2023, as a total generation, renewable energy generation increased to 44.5% in the UK[6]. This has outpaced fossil fuel's share for the fourth consecutive quarter.

1.26 However, the next step towards achieving net zero is to decarbonise businesses, replacing the flexibility that we get from utilising gas with low carbon alternatives. The success of such a phase is reliance on education and people's choices along with ensuring that access to renewable energy is both reliable and cheaper than fossil fuel alternatives. The strength of government policy is significant in changing people's behaviour and adoption of low emission technologies. Decarbonising businesses will also be made much easier for those whose processes can be done via electrification.

1.27 Premier Foods' production lines are electrified, thus the installation of a solar farm is an effective solution to decrease emissions. Furthermore, Premier

[5] See Final UK Greenhouse Gas Emissions National Statistics; 1990 to 2020 https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2020
[6] See Energy Trends and Prices Statistical release: 21 December 2023 https://www.gov.uk/government/statistics/energy-trends-and-prices-statistical-release-21-december-2023

Foods' business case demonstrates that this is a viable solution and can be installed as soon as possible, supporting its Environmental, Social Governance (ESG) Strategy. The scheme, which meets the Government's agenda to offset greenhouse gas emissions, should be supported as a matter of urgency.

1.28 Through the publication of NPS EN-1 and EN-2, the Government has identified a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to urgently reduce the UK's reliance on carbon emitting sources such as coal, oil and gas. Whist a CNP relates specifically to NSIPs, the overarching message is very clear that the provision of renewable low carbon energy infrastructure is a national priority and thereby a material consideration of substantial weight for Town and Country Planning Act (TCPA) planning applications.

1.29 Given the CNP presumption for the delivery of renewable energy, on balance, the proposal itself and the environmental benefits arising from the scheme are considered to outweigh any limited harm arising from the proposal.