

Scott Jackson

Via Email

15 December 2025

Dear Sir/Madam,

PA/2024/124- Solar Farm on land adjacent to AALPS College, Winterton Rd

I write to you in relation to the Agricultural Land Classification (ALC) and to provide justification in relation to the use of Best and Most Versatile land for the proposed solar farm development on land adjacent to AALPS College, Winterton Road (planning reference PA/2024/124).

The applicant remains of the view that an alternative site assessment (ASA) is not required to satisfy any policy, guidance or to address the written ministerial statement in relation to the use of Best and Most versatile land. Nonetheless it is understood that justification for the use of Best and Most Versatile land is a requirement. Therefore further to the previous submission the attached plan provides a consideration of alternatives and the table below provides justification as to why these have been discounted.

The 'potential areas for development plan' shows the inverse result of the constraints mapping process we undertake on any site, as previously stated a 5km buffer from the point of connection is usually what is applied. In this instance our site is slightly further than this due to the site specific benefits, not least of which is the secured grid connection which is available in the very near future making the site viable even though it is slightly further away. The landowner owns the land to the immediate south of our submitted red line, which falls within the 5km radius. This land was originally looked at but rejected due to the proximity to the Medieval village of Sawcliffe, mining lease restrictions and topography, at this point we had a willing landowner. However, the matter of distance to be considered in relation to alternative sites was recently considered by the Examining Authority (and the secretary of state) in allowing the Hellios DCO solar application. In that decision the ExA considered a 5km buffer sufficient for reasons set out in the decision- predominantly financial viability and energy efficiency due to longer cables resulting in electricity losses. This consideration related to a 190MW development which is sited on land comprising 44.9% Grade 1 or Grade 2 and 52.4% Grade 3a. In allowing the Hellios solar farm the Secretary of State confirmed, policy does not prevent solar development on BMV land. The availability of grid connection and the mapped constraints in the surrounding area are practical

drivers of site selection which influence not just BMV but e.g. the approach to the sequential test.

Notwithstanding the above considerations, which are relevant, to assist the Local Planning Authority in determining planning application PA/2024/129 and to incorporate the site within the consideration area a buffer of 5km-7km has been applied. The area of search includes the full application site. As shown on the plan both policy and physical constraints have been applied and available land areas remaining have then been reviewed for suitability and commercial viability based on the available grid connection capacity and its location. It is very important to note that the grid offer we have been issued by the DNO relates only to the land within the red line boundary. There is no opportunity to novate the grid offer (with the current date of connection) to alternative land. Therefore a significant benefit of this site is the significant contribution the site will make to renewable energy generation in a very quick period of time as our grid connection gate is 2028.

Helios Renewable Energy Project - Project information

The resultant potential site areas are broken down below.

Constraint	Buffer	Comment
ALC grades 1, 2, Urban & Non-Agricultural	Area only	Undertaken to show all areas with lower grade land, other areas of grade 1 and 2 land are available free of other constraint but do not offer a lower agricultural value to consider further than the proposed development site.
Surface Water Flood Risk	Area only	Flood risk areas avoided due physical constraints in construction and and insurance requirements for the scheme. There is also potential impacts to

		neighbouring land in terms of flooding. National and local policy requires a sequential approach which would fail due to alternatives (such as our current site) which is not constrained by flood risk.
Flood zone 2 & 3	Area only	Discounted as above
Mineral Lease Area	Area only	Areas under existing mineral lease restricts access therefore development cannot be achieved and there is not opportunity to include cable easement within this restricted area.
RAMSAR Buffer	4.8km	Survey work at the application site has satisfied Natural England (NE) and local ecologist that the application site is not functionally linked to RAMSAR site, Humber SAC and Humber SPA. Areas closer to these ecological designations closer than the application site are discounted in the absence of survey work and due to the risk of impacting functionally linked land (which is highly likely given the closer distance to protected area)
Residential Property	250m	Set back included to preserve residential

		amenity and avoid resident objections
Conservation Areas	250m	Set back included to preserve conservation area (including setting) which are designated heritage assets which are protected by planning policy.
Local Nature Reserves	50m	Set back to minimise impacts on locally important sites protected by policy
Scheduled Ancient Monuments	50m	Set back to minimise impacts on setting of any scheduled monuments protected by policy
SSSI	50m	Set back to minimise direct or indirect impacts on SSSI status of sites
Woodland	25m	Set back to avoid ancient woodland and root protection zones of other wooded areas in line with the Woodland Trust guidance. These areas also provide a physical constraint in terms of shading potential. Woodland and set backs may extend in excess of this dependent on the age structure of the woodland in question. This is a minimum set back.
Railway	15m	Set back to avoid impact to the operational rail network and conflict with network

		rail in relation to piling activity.
Roads	15m	Set back to reduce driver distraction and road safety also distance is required to allow for any mitigation
Overhead lines	10m	Set back required as a minimum for all OHLs
Watercourses	10m	Set back to avoid impacts to water courses this may be required to be larger depending on

Taking into account the above policy and physical constraints there were some sites identified to be unconstrained and therefore identified as ‘developable’. All of these have been discounted for reasons set out below. For clarity these are colour coded for discussion however some are discounted for more than one of the reasons below.

Magenta – These potential areas all sit on the southern side of the M180 motorway, this is a significant barrier to any grid connection route and requires detailed legal arrangements with the relevant operator and landowner under the road in order to pass under the motorway, opportunities to cross the M180 are limited and areas set away from the Messingham area result in a grid connection distance well in excess of the current grid route for the application site, as set out above, and agreed on the Hellios DCO an increased cable route negatively impacts the viability of the development and reduces electrical efficiency due to its length and the associated impact this has on associated losses and increased grid connection costs, it adds a significant financial burden to the project which yields an unviable site potential for the grid connection which is currently secured.

Areas around Messingham have been avoided to reduce the inclusion of infrastructure in areas of green space between the two settlements. In these areas there may be a perception of erosion of green space between Messingham and Scunthorpe and therefore coalescence of the two settlements. Avoiding these areas retain green space on the main route into Scunthorpe from the south.

Light Blue / Cyan – These potential areas are all situated in high amenity value green space and would present development between the residential southern extent of Scunthorpe and the M180 eroding the availability of green space directly adjacent to the town.

Yellow / Gold – These areas are all too small to accommodate a development of a scale suitable for the grid connection secured by the DNO, those areas to the east of the B1207 are also separated significantly from the connection point and would not be viable given the losses associated with an increased grid route length coupled with the significantly higher costs and disturbance for residents associated with the route.

Dark Blue – These areas are identified as ‘existing land use’ these comprise a golf course area south of Scunthorpe, land associated with the steel works, operational solar farms, solar farms in planning and proposed areas where other developers have land under option to progress applications. None of these offer a feasible alternative to the proposed development site.

Sites referred to above include but are not limited to:

- PA/2025/620
- PA/SCR/2025/7
- PA/2024/123
- Operational Solar Development at Raventhorpe Farm and Mendle Farm

Green – The remaining green area south east of the proposed site is of sufficient size and the land appears suitable for the purposes of accommodating a solar development. However this land is discounted for a number of reasons. Some areas of this are physically constrained due to topography which in itself would discount these areas which are not physically capable of accommodating the infrastructure, sites on steeper ground impacts the actual developable available. However, notwithstanding this this ‘green’ area is also limited by the length of cable route required for the reasons discussed above long cable routes impact upon the viability and developability of sites. The land to the immediate west of our site is also of a sufficient size but is discounted due to grid route length as this would be wholly via the road due to the impact of mining lease land.

These areas also have limited options for cable route to the point of connection to satisfy the DNO requirements to be within a public highway for adoption of the cable asset upon completion of the connection, a route to the east then either north / south to other main roads into Scunthorpe are the only opportunity available to accommodate the connection to the DNO we hold and would result in a grid connection length of more than 13km, this is simply unviable and would result in significant losses at the available connection voltage and would render a project of this scale unviable.

Conclusion

Whilst there is no policy requirement to provide an alternative site assessment, on the basis of the above justification is provided for the selection of the current site, in line with NPPF, PPG, Local Policy and the Written Ministerial Statement the use of BMV land in this instance is fully justified on this basis by virtue that there are no alternative sites available on lower grade agricultural land which is suitable to accommodate the development to facilitate the grid connection secured for this land.

Roxby Solar Farm site presents the only available opportunity to us to develop a solar farm in the north Lincolnshire council area to support local and national objectives and make a meaningful contribution to legally binding renewable energy generation targets as set out in the submitted Planning Statement and subsequent submission in this regard. The project has received notification of a Gate 2 offer under the TMO4+ grid reform process and is listed as a Phase 1 project with a connection date before 2030 being strategically aligned with the Governments CP2030 action plan.

By virtue of the justification provided above, the proposed development is fully policy compliant in this regard and should be approved without delay.