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**VICARAGE DROVE SOLAR FARM** 

**LAND NORTH-WEST OF BICKER** 

**ALTERNATIVE SITE ASSESSMENT** 

Date: September 2021

DWD Ref: 15349

# Vicarage Drove Solar Farm Alternative Site Assessment





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### 1.0 INTRODUCTION

- 1.1 This Alternative Site Assessment has been prepared on behalf of Renewable Connections

  Developments Ltd (the 'Applicant') in support of a planning application for the development of a

  solar photovoltaic farm with battery storage and associated infrastructure.
- 1.2 The proposal is hereafter referred to as the 'Proposed Development'. The project is known as 'Vicarage Drove Solar Farm'.

### Site Summary

- 1.3 The Proposed Site comprises approximately 80.36 hectares ('ha') of agricultural land located within the administrative area of Boston Borough Council (the 'Council') to the north west of the village of Bicker.
- 1.4 The Proposed Site is located directly adjacent to a point of connection into the National grid Electricity Transmission network, to its east.
- 1.5 The submitted Agricultural Land Classification finds that the Proposed Site comprises Grade 3a land (good quality) and a smaller proportion of Grade 2 land (very good quality). It follows that the Site is farmed as a unit of Grade 3a land and is classed as Grade 3 for the purposes of this ASA. The Proposed Site is therefore considered to be best and most versatile ('BMV') agricultural land.

# **Renewable Connections**

1.6 Renewable Connections Developments Ltd ('Renewable Connections') are one of the most experienced renewable energy teams in the UK having developed over 1GW of solar projects globally since 2010. Renewable Connections work in partnership with European Energy, one of the largest renewable energy investors in Europe.

### **Purpose and Structure of this Report**

- 1.7 The assessment set out in this report seeks to identify if there are any potentially more suitable sites situated on:
  - previously developed and or/non-agricultural land (hereafter referred to collectively as 'previously development land'); or
  - lower or equal grade agricultural land (i.e. Grades 3, 4 and 5).
- 1.8 This assessment is carried out in support of the planning application and seeks to demonstrate that the Applicant has given due consideration to the benefits and constraints associated with the Proposed Site.

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- 1.9 Importantly, it should be noted that there is no statutory or defined policy requirement to carry out an 'alternative site assessment' or similar. The Applicant has adopted a policy to carry out alternative site assessments for solar farm proposals when developing on greenfield sites.
- 1.10 Commercial rooftops are not considered because (i) there are no known rooftops of sufficient size in the local area and (ii) it is considered that assessing the potential for development of multiple rooftops is not comparable to a ground-mounted solar PV farm. Furthermore, paragraph 013 (REF:5-013-20150327) in the Government's National Planning Practice Guidance states that in considering ground-mounted solar farms, the focus should be on the effective use of previously developed land and non-agricultural land. Rooftops are not mentioned.
- 1.11 The remainder of this report is structured as follows:
  - Section 2 key features of the site and the proposed development;
  - Section 3 relevant planning policy;
  - Section 4 the methodology applied to identify and assess alternative sites;
  - Section 5 application of the methodology and assessment of alternative sites; and
  - Section 6 summary and conclusions.



# 2.0 PROPOSED DEVELOPMENT

# The Proposed Site

- 2.1 The Site comprises agricultural land located north-west of the village of Bicker. The Site is delineated in red on the submitted Site Location Plan (Reference: RNC004-SP-01). The Site measures approximately 80.36 Ha.
- 2.2 The Site is located approximately 2.5km to the north west of Bicker village. It is located within the administrative area of Boston Borough Council however it abuts South Holland District Council boundary to the south. The National Grid Reference for the centre of the Site is TF18743879.
- 2.3 Renewable energy generation is already a component in the area as the Site is adjacent to an existing operational 13 turbine wind farm (known as Bicker Fen). The Site is also adjacent to large substation complex which contains various electricity substations, infrastructure and equipment, and into which the Proposed Development is proposed to connect.
- 2.4 The Site is bound to the north by Bicker Drove and beyond this to the north is a substation associated with the Triton Knoll offshore wind farm. The South Forty Foot Drain, a designated Local Wildlife Site, runs adjacent to the western boundary.
- 2.5 In addition to the existing wind farm and substation complex, the skyline surrounding the Site is also broken up by the many electricity pylons which cross the landscape. The surrounding area is predominantly agricultural and the topography of both the Site and nearby land is relatively flat.
- 2.6 There are few PRoWs in the locality. The Cross Britain Way, a National Trail, crosses the landscape to the south of the Site along North Inge Road and then along part of the South Forty Foot Drain embankment going south. The footpath continues as a ProW along the embankment. A local footpath passes to the east of the Site along the Hammond Beck.

### The Proposed Development

- 2.7 The Proposed Development comprises the construction and operation of a solar photovoltaic ('PV') farm with battery storage and associated infrastructure. The Proposed Development includes the following equipment:
  - rows of solar photovoltaic ('PV') panels;
  - inverters within containers;
  - battery storage units within containers;
  - substation compound, including:

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- o DNO Substation and Customer Switchroom;
- internal access tracks;
- perimeter fence; and
- CCTV cameras.
- 2.8 The point of connection to the electricity grid is a direct connection to the Bicker Fen substation which houses both transmission and Western Power Distribution infrastructure. The proposed onsite substation will facilitate the connection.
- 2.9 It is estimated that the solar panels would generate up to 49.9 megawatts ('MW'), enough to power approximately 14,000 homes.
- 2.10 The Indicative Site Layout Plan (Reference: RNC004-PL-01) that forms part of the planning application submission illustrates the indicative layout.



### 3.0 PLANNING POLICY

- 3.1 The Search Area described and used below is within the local planning authorities of Boston Borough Council, South Holland District Council and North Kesteven District Council. However, Boston Borough Council and South Holland District Council form the South East Lincolnshire Joint Strategic Planning Committee, along with Lincolnshire County Council, and share policy, while North Kesteven District Council are part of the Central Lincolnshire Joint Strategic Planning Committee along with Lincoln City Council and West Lindsey District Council. As such, the planning policy and guidance most relevant to the consideration of alternative sites in the context of this assessment is considered to comprise the following:
  - South East Lincolnshire Local Plan 2011 2036 (2019);
  - Central Lincolnshire Local Plan 2012 2036 (2017);
  - National Planning Policy Framework ('NPPF') (2019);
  - National Planning Practice Guidance ('NPPG') (online resource); and
  - Overarching National Policy Statement ('NPS') for Energy Planning ('EN-1') (2011).
- 3.2 For further detail to the planning policy specifically relevant to the Site and the compliance of the Proposed Development with it, please refer to the Planning Statement that forms part of the application submission.
- 3.3 The specific guidance set out in each of the above documents is summarised below.

### **Local Planning Policy**

- 3.4 Policy 31 (Climate Change and Renewable and Low Carbon Energy) of the South East Lincolnshire Local Plan 2011 2019 states that "the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies on existing or proposed structures will be permitted provided, individually, or cumulatively, there would be no significant harm to:
  - 1. visual amenity, landscape character or quality, or skyscape considerations;
  - 2. residential amenity in respect of: noise, fumes, odour, vibration, shadow flicker, sunlight reflection, broadcast interference, traffic;
  - 3. highway safety (including public rights of way);
  - 4. agricultural land take;
  - 5. aviation and radar safety;



- 6. heritage assets including their setting; and
- 7. the natural environment"
- 3.5 Policy LP19 (Renewable Energy Proposals) of the Central Lincolnshire Local Plan 2012 2036 states that "Proposals for non-wind renewable technology will be assessed on their merits, with the impacts, both individual and cumulative, considered against the benefits of the scheme, taking account of the following:
  - The surrounding landscape and townscape;
  - Heritage assets;
  - Ecology and diversity;
  - Residential and visual amenity;
  - Safety, including ensuring no adverse highway impact;
  - MoD operations, including having no unacceptable impact on the operation of aircraft
  - movement or operational radar; and
  - Agricultural Land Classification (including a presumption against photovoltaic solar farm
  - proposals on the best and most versatile agricultural land)."

# **National Planning Practice Guidance**

- 3.6 The policies contained within the NPPF are expanded upon and supported by the NPPG, which was originally published in March 2014 and has been updated periodically since.
- 3.7 With regards to the location of solar farms, paragraph 013 (Ref: 5-013-20150327) cites the following factors that local planning authorities should consider:
  - 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 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.



# **Overarching National Policy Statement for Energy Planning**

- NPS EN-1 is a material consideration for planning applications under the Town and Country 3.8 Planning Act 1990 and has been included because it is the only policy document that provides any practical guidance in terms of alternative site assessments for energy projects.
- 3.9 The principles set out at paragraph 4.4.3 of EN-1 provide useful guidance, as follows:
  - the consideration of alternatives should be carried out in a proportionate manner;
  - there should be a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development;
  - alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable (e.g. on the market and available), should be excluded on the grounds that they are not important and relevant; and
  - alternative proposals which are vague or inchoate can be excluded on the grounds that they are not important and relevant.
- 3.10 The above principles are effective provisions in terms of scoping the assessment; although, as previously stated, it is important to note that there is no statutory or specific planning policy requirement to consider alternative sites in relation to the development of best and most versatile (or other) agricultural land in EN-1 or in other planning policy document.



# 4.0 METHODOLOGY

#### Overview

- 4.1 This section sets out the qualitative, sequential methodology utilised to carry out the assessment. It should be noted that this type of methodology has been utilised to support many planning applications relating to solar farms in the UK.
- 4.2 The assessment is split into two parts:
  - 1. Previously developed land to establish whether there are any potential alternative sites located on previously developed land that could be utilised (note: the Proposed Site is not previously developed land); and
  - 2. Lower or equal grade agricultural land to establish whether there are any potential alternative sites located on lower or equal grade land that could be utilised (note: the Proposed Site is classed as Grade 3b for the purposes of this assessment).
- 4.3 As previously stated, commercial rooftops have not been considered because (i) there are no known rooftops of sufficient size in the area and (ii) it is considered that assessing the potential for development of multiple rooftops is not comparable or realistic when considered relative to a ground-mounted solar farm. Furthermore, as previously stated, the NPPG states that in considering ground-mounted solar farms, the focus should be on the effective use of previously developed and non-agricultural land. Rooftops are not mentioned.
- 4.4 The methodology utilised to carry out the assessment is sequenced as follows:
  - definition of a search area;
  - analysis of previously developed land;
  - analysis of lower or equal grade agricultural land;
  - establishment of a long-list;
  - long-list filtering to create a short-list of sites; and
  - assessment of the short-list.
- 4.5 The above are explained in turn in the remainder of this section.

### The Search Area

4.6 It is important to identify a proportionate and appropriate area of search (hereafter referred to as the 'Search Area') from which potential alternative sites are identified for assessment.



- 4.7 There is no specific guidance in relevant planning policy documents to determine the geographic area that should be applied. The Search Area for this assessment has therefore been based on the requirement to connect the Proposed Development to a local electricity distribution network (hereafter referred to as the 'Grid') and the parameters associated with this, because any solar farm without a feasible grid connection is not viable.
- 4.8 The Proposed Development would connect into an existing substation located south east of the Proposed Site (the 'Point of Connection').
- 4.9 The Search Area for alternative sites has therefore been defined to include an area of 3 km around the Point of Connection please refer to Figure 1 at Appendix 1, which illustrates the Search Area.

# **Analysis of Previously Development Land**

- 4.10 Relevant publicly available data was reviewed to identify previously developed land within the Search Area that could potentially be available for the Proposed Development.
- 4.11 The data included what are considered to comprise the most up-to-date, relevant adopted and/or emerging Development Plan Documents ('DPD') produced by the South East Lincolnshire Joint Strategic Planning Committee and the Central Lincolnshire Joint Strategic Planning Committee. The following types of allocation/sites were added to a 'long-list' of potentially suitable sites;
  - land allocated for renewable energy or other similar development; and
  - land allocated for employment, or another land use that could potentially be compatible with energy development.
- 4.12 To further supplement the DPDs, the following were also reviewed:
  - the Estates Gazette website (http://propertylink.estatesgazette.com) where a search for commercial/industrial land can be carried out within a defined search area; and
  - the most recent version of the Boston Borough Council, South Holland District Council and North Kesteven District Council brownfield land registers which are maintained on the Councils' registers in accordance with government guidelines.

# **Analysis of Lower or Equal Grade Agricultural Land**

<u>Scope – Agricultural Land Classification Grades Considered in The Assessment</u>

4.13 The Agricultural Land Classification ('ALC') system classifies land into five grades (1-5), with Grade 3 subdivided into sub-grades 3a and 3b. The BMV land is defined as Grades 1, 2 and 3a and is the



land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations.

- 4.14 The nationally available (or 'Provisional') ALC survey data obtained from Natural England does not distinguish between Grade 3a and 3b. There are small areas within the Search Area where the subdivision data is available from Natural England and, where available, this has been applied.
- 4.15 The Proposed Site comprises a mixture of Grade 3a (good quality) and Grade 2 (very good quality) agricultural land as established by the Agricultural Land Classification Report that forms part of the planning application submission, with Grade 3a land predominating. It follows that the Site is farmed as a unit of Grade 3a land, and is classed as Grade 3 for the purposes of this ASA. Therefore, the assessment set out in this report focuses on considering whether there are any potential alternative Grade 3, 4 or 5 sites, i.e. lower or equal grade agricultural land than the Proposed Site.

#### Site Identification Criteria

- 4.16 In order to identify potentially suitable sites, the first stage of the identification process utilised Geographical information Systems ('GIS') to discount constrained sections of land from within the Search Area. The definition of 'constrained' land was determined by reference to the planning policy set out earlier in this report, with particular focus on environmental considerations.
- 4.17 The criteria applied to rule out constrained land are as follows:
  - Slope and gradient sites where the topography is unsuitable (note: small areas of adverse topography can be dealt with via engineering adjustments to the solar arrays);
  - Designated sites/assets land within designated sites/assets avoided (including National Parks; Areas of Outstanding Natural Beauty; World Heritage Coast; Special Protection Areas ('SPA'); Special Areas of Conservation ('SAC'); Ramsar Sites (International Wetlands Designation); Sites of Special Scientific Interest ('SSSI'); National Nature Reserves; Local Nature Reserves; Royal Society for the Protection of Birds Reserves; Important Bird Areas; Listed Buildings; Scheduled Monuments; Registered Battlefields; and Registered Parks and Gardens);
  - Green Belt land within the Green Belt avoided where more viable non-Green Belt land is available; and
  - PRoW areas crossed by a significant number of PRoWs avoided, where possible.
- 4.18 Please note that Flood risk areas dominated by Zone 2 and 3 are usually discounted (the zones with the highest risk of flooding) however this criteria has not been applied in this instance due to the



significant proportion of land in the surrounding area including the vast majority of Boston Borough that is within Flood Zones 2 and 3. This is demonstrated in Figure 4.1 below.

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Figure 4.1: Extract from the EA Flood Map for Planning

- 4.19 The second stage of identification process comprised splitting any remaining 'unconstrained' areas/tracts of land into potential sites for assessment. The sites were defined through the application of professional judgement and having regard to the following:
  - irregular areas discounted;
  - any urban/built up areas removed;
  - clear and continuous area of land (e.g. avoiding woodland);
  - avoiding sites split by roads, railway lines and water bodies, where possible; and
  - boundaries defined by man-made and natural features (e.g. roads, properties and woodland).
- 4.20 Any identified sites were then added to the long-list.

# Filtering of the Long-list

4.21 The long list was then 'filtered' to remove any sites below 80 ha (the approximate area of the Proposed Site). Any sites that did not meet this criterion were filtered out.



- 4.22 Multiple sites equating to a total of 80 ha were not considered in the assessment, because a scheme comprising of multiple sites is not considered to represent a comparable alternative. This is because in comparison to a single, continuous site, multiple sites would have other potentially limiting factors, including, but not limited to, legal agreements with multiple land owners; the complexity of connecting multiple sites to the electricity distribution network; and the potential for intensified disruption associated with the development of multiple sites.
- 4.23 For the above reasons, the consideration of multiple sites is not considered proportionate, realistic or deliverable as an alternative when considering, amongst other things, the principles set out in paragraph 4.4.3 of NPS EN-1.

#### Assessment of the Short-list

- 4.24 The remaining sites were added to a 'short-list' and assessed against a range of policy, environmental and viability criteria (determined with reference to relevant planning policy), as follows:
  - Is the land likely to be available, e.g. on the market or proposed for another use?
  - Distance from the potential point of connection is the potential point of connection on site or further away?
  - Are there obstacles between the site and potential point of connection?
  - Shape of the site is it regular/irregular?
  - Is the land clear and developable?
  - Are there any footpaths crossing the site?
  - Flood risk areas Flood Zone 1 favoured.
  - Any other relevant considerations, such as, for example, whether the site benefits from a suitable highway access?
- 4.25 The Applicant is aware that there are aerodromes located in the wider area. It is expected that the operator(s) would be consulted by the Council during determination of the planning application. The aerodrome is not considered a constraint for the purposes of this assessment, on the basis that ground-mounted solar panels are low lying and are designed to absorb sunlight.
- 4.26 The assessment of the short-list determined whether there are any potential feasible alternative sites. The assessment utilised professional experience and judgement to draw conclusions.

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4.27 It should be noted that the consideration of some criteria is repeated at the short-list stage, in order to apply the criteria to sites generated by the search of previously developed land or non-agricultural land, as these sites were not subjected to the GIS exercise utilised by the search for lower or equal grade agricultural land (where these criteria has previously been applied).



# 5.0 ASSESSMENT

- 5.1 This section sets out the following parts of the assessment:
  - previously development land search;
  - lower or equal grade agricultural land search;
  - long list and filtering; and
  - assessment of sites on the short-list.

### **Previously Development Land**

- 5.2 As set out above, the search area lies across the administrative areas of Boston Borough Council, South Holland District Council and North Kesteven District Council. Development Plan Documents and supporting evidence base documents. Relevant brownfield land registers and the Estates Gazette online search were also reviewed. Where Sites were identified in multiple documents, only one entry is included below.
- 5.3 One Site was added to the long-list following analysis of previously developed land.

### **Lower or Equal Grade Agricultural Land**

- 5.4 The GIS criteria set out in Section 3 of this report were applied. The sequential application of the GIS criteria is illustrated in Figures 1-9 of Appendix 2 of this report. Figure 9 shows the location of unconstrained land in the Search Area.
- 5.5 **No Sites** were added to the long-list following the analysis of lower or equal grade agricultural land.
- 5.6 The long-list (with application of the filtering criterion) is set out in Table 5.1.

Table 5.1: Long-list and Filtering

Site Reference	Site Address	Approx.	Source		Filtering – 80 ha
		Area (ha)			or above?
BLR/DON/001	Former Red Cow Hotel, 8 High Street,	0.33	South	Holland	No – insufficient
	Donington		Brownfield	Land	size
			Register		

- 5.7 No sites were added to the short-list.
- 5.8 The criteria set out in Section 4 of this report are applied to the Proposed Site to provide context and demonstrate suitability and would be applied to short-listed sites if any had been identified. The assessment was desk-based; carried out with reference to, amongst other things, available aerial imagery, and Figures 1 – 9 Appendix 1.



# The Proposed Site

5.9 The Proposed Site comprises a number of agricultural fields located west of Bicker and north west of Donington, covering an area of approximately 80 ha.

**Table 5.2: Assessment of the Proposed Site** 

Criteria	Assessment
Is the land likely	The Proposed Site is available to the Applicant, is ready for development
to be available,	and is not subject to any other proposed uses or allocations that might be
e.g. on the	considered incompatible.
market or	
proposed for	
another use?	
Is the topography	The Proposed Site benefits from favourable topography for the purposes of
favourable?	a solar farm.
Distance from the	The point of connection is located directly to the east of the Proposed Site.
potential point of	
connection – is	
the potential	
point of	
connection onsite	
or further	
away?	
Are there	No – as mentioned above, the point of connection is located directly
obstacles	adjacent to the Proposed Site.
between the site	
and point of	
connection?	
Shape of the site	The Proposed Site consists of a number of agricultural fields which are
– is it	considered to be of regular shape for a solar farm.
regular/irregular?	
Is the land clear	The land is clear of built development and considered to be developable.
and developable?	
Are there any	A footpath runs along the western boundary of the Proposed Site.
PRoWs crossing	
the site?	
Flood risk areas –	The Proposed Site is located entirely within Flood Zones 1-3. However as
Flood Zone 1 –	noted in paragraph 4.18 above, a significant proportion of land in the
favoured.	surrounding area including the vast majority of Boston Borough is located
	within Flood Zones 2 and 3.
Any other	An Agricultural Land Classification survey found that the majority of the
relevant	Proposed Site is Grade 3a with the remainder being Grade 2. It follows that
considerations?	the land is farmed as Grade 3a land.

5.10 Summary and discussion: The Proposed Site complies with the main criteria, including that it has a viable connection, is immediately available to the Applicant for the development of a solar farm and battery storage, and is clear, developable and of regular shape. It is noted that it is located on



BMV agricultural land, however, it is on land farmed as Grade 3a land whereas the remainder of the agricultural land in the surrounding area is Grade 1 and 2 according to the Government's nationally available (or 'Provisional') ALC survey data. As shown in Figure 8.1 below, the wider surrounding area (including the entirety of Boston) comprises a combination of Grade 1 (mid blue) and Grade 2 (light blue) agricultural land.

5.11 Therefore, the ASA demonstrates that there are no more suitable alternative sites located on lower grade land in the area and the development of the Site would mean that the area's high-quality agricultural land is preserved and the development of any designated sites is avoided.



Figure 5.1: Extract from the Natural England ALC data



# 6.0 SUMMARY AND CONCLUSIONS

- 6.1 The Search Area is significantly constrained due to the agricultural land being a mixture of Grade 1 and Grade 2 according to the Government's Provisional ALC survey data, which is of a higher grade than the Proposed Site which is farmed as Grade 3a land. As a result, no alternative agricultural sites could be identified on lower or equal grade agricultural and none were added to the long-list or short-list.
- 6.2 With regards to brownfield sites and those allocated for development, just one site was identified and added to the long-list. This is because the search area is predominantly rural and with regards to build up areas it only takes in part of two small villages.
- 6.3 The Proposed Site demonstrably complies with the main criteria, as outlined in Table 5.2. Although it is located on BMV land, it is of a lower grade than agricultural land in the surrounding area.
- 6.4 It is therefore concluded that there are no sites which comprise a more feasible alternative to the Proposed Site.



# **APPENDIX 1: FIGURES 1-9 (GIS FIGURES)**

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