

Leaford Solar Farm Addendum Report

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For: Renewable Energy Systems Ltd.

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1. Introduction

This addendum report has been prepared in response to feedback received from case officer Vanessa Blake in her email dated 23rd August 2024 in support of the Leaford Solar Farm planning application and should be read in conjunction with the supporting Addendum Covering Letter.

This addendum report also covers the following important aspects raised in the above-mentioned email:

- Swale location at the Proposed Development;
- Water Crossing Drawing;
- The location of residential receptors for the Glint & Glare and LVIA;
- Further Landscape Assessment;
- Our response to the comments received from Conservation Officer;
- Updated Figures; and
- The removal of Figure 18;

As discussed in the attached covering letter, responses have been prepared by the project team, including the relevant technical authors where applicable.

This addendum report discusses the latest updates with the National Planning Policy Framework (NPPF) and the newly published Clean Power 2030 – Action Plan both of which are material considerations in respect of determining the planning application.

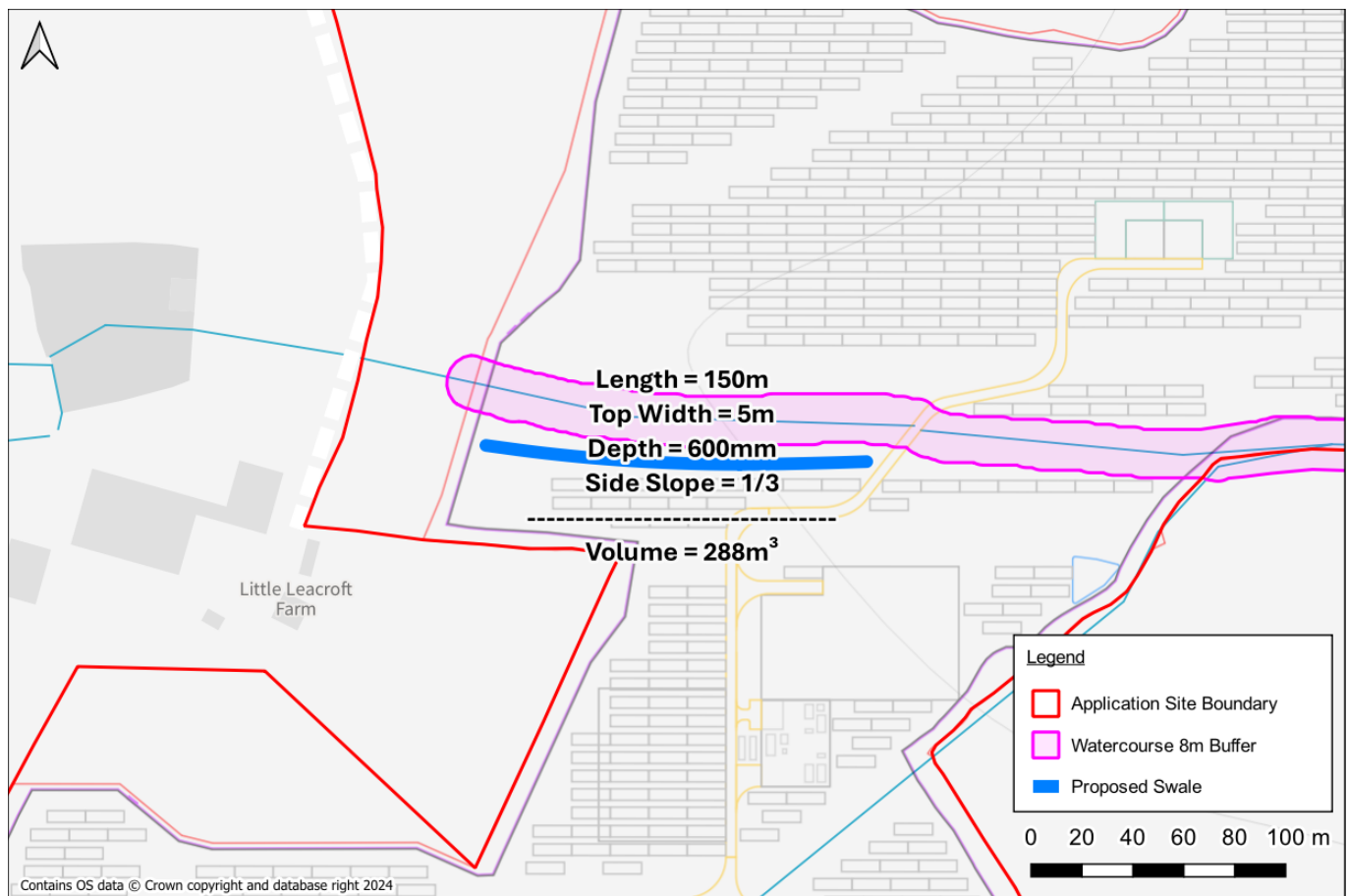
2. Swales

2.1 Swale Location

In response to query Y of the email list provided on the 23rd of August 2024, details of a swale for the Proposed Development have been provided. A swale with dimensions listed below could be positioned adjacent to the watercourse to provide more than the required storage of 284m³. The exact location and design of the swale would be confirmed at the detailed design stage.

Length	= 150m
Top width	= 5m
Depth	= 600mm
Side slopes	= 1/3
<hr/>	
Total volume	= 288m³

Image 2.1: Location of Proposed Swale



3. Water Crossing Drawing

In addition to these amendments, Figure 18 – Typical Water Channel Crossing Culvert (drawing number: 05004-RES-DRN-DR-PT-001) has been submitted alongside this Addendum Report following comments received from the Environment Agency and a request to provide this information in the email list provided on the 23rd of August 2024. This can be found as Appendix A.



4. Residential Receptors for Glint & Glare (G&G) Report and LVIA

4.1 Residential Receptors for Glint & Glare (G&G) Report and Landscape and Visual Impact Assessment (LVIA)

Regarding points W and X of the email list provided on the 23rd of August 2024, we attach a figure (Appendix B) showing the location of the residential receptors for both the G&G Report and LVIA (312040 Leaford Solar Farm – Modelled Dwelling Locations), of which the following are in the same locations:

- Observation Point (OP)8 and R26 (Field View)
- OP9 and R23 (Long Lane Head Farmhouse)
- OP10 and R20 (The Hollies Farm)
- OP11 and R17 (Meadow View House)
- OP12 and R9 (Leacroft View)
- OP15 and R5 (Logobi)
- OP16 and R29 (Crofters Cottage)
- OP17 and R33 (Fulford Manor)
- OP18 and R6 (Little Leacroft Farm)

The LVIA residential dwellings receptors chosen are all located within 1km of the Proposed Development which is considered sufficient to assess any potential impacts. Residents located within settlements were assessed within a greater area as these included public places.

Regarding the OPs selected for the Glint & Glare Report, only the receptor points closest to the Proposed Development with a potential line of sight towards the PV panels were considered, as other dwellings would be screened by these receptors, as well as vegetation and/or other buildings found in between them. The receptors do not cover every house but are considered to be representative general locations of potential glare impacts toward nearby receptors in various directions around the development.

Also please find the excel spreadsheet of the coordinates used in the G&G report attached as Appendix C to this Addendum Report.



5. Further Landscape Assessment

Following comments received from Design Midlands, it was agreed that an additional viewpoint at the Fulford 3 PRoW should be assessed given this viewpoint provides a “*dramatic and clear panoramic view over the distant countryside*”. This Viewpoint (VP10) has been assessed as having a medium-low magnitude of change and a moderate, adverse not significant level of visual effect by Year 5. This assessment is detailed below and the VP10 photomontage can be found as Appendix D of the Addendum Report.

Assessment of additional Viewpoint 10:

This viewpoint is located at OS grid reference E394940 N338841 294m from the nearest proposed solar panels. The viewpoint is located on a public footpath (Fulford No.3) which links Fulford with Stallington, and represents recreational users located on high ground to the west of the Site. It is located in Settled Plateau Farmland Slopes LCT. The view is centred on an east-north-easterly direction and a panorama photograph, photomontage and wirelines with a 90-degree view splay are presented in Visualisations 10a-d. It should be noted that the visualisations have been created using photography taken during a period of lying snow, showing a worst-case view on a sunny day when the solar panels would appear dark in tone and more prominent in places. This visual pattern is relatively unusual.

The solar panels located in F10 and F13 would be prominent seen in front of the wider Site to the north and the changes to the view would affect much of a 90-degree viewsplay. The front face of the panels would be visible from this angle of view. The solar panels in F7 and F10 would be clearly visible, partially screened by the intervening hedge line and trees. In addition, the solar panels located in F8 and F11 would be partially visible. The solar panels located in the north-western part of the Site including F1, F3, F4, F5 and F6 would be visible in the middle distance. The communications mast and substation building would also be visible centrally. Built development in the north-east, east and south parts of the Site would be fully screened by landform and the existing trees and hedges within the Site.

These areas would be located within the existing field pattern, and occasional hedge trees and blocks of woodland would partly filter the view and break up the grouping. In the winter conditions shown in the photograph, the solar panels would stand out in colour and tone relative to the snow although on cloudy days they may appear paler and more recessive. In summer conditions, trees and hedges would provide more screening, and the solar panels would appear differently depending on the appearance of skies.

The Development would be the focus of the view and would affect 65% of a 90-degree view, introducing large areas of built development into a rural view. The solar panels would retain the field patterns, tree cover and the physical openness of fields, albeit affecting visual amenity and character.

The Development would be seen cumulatively with the Newton Farm Solar Farm located 2.5km to the east, although it is a glimpsed view and the two developments seen together would not cause a significant sense of renewable energy proliferation within the assessed or wider view.

The Development would be seen within the context of areas of built development in the distance including Blythe Bridge and Draycott the Moors. The outskirts of Stoke-on-Trent would be visible in the wider view including the large scale and pale coloured sheds (Meyer Timber Ltd.) located 1.6km to the north. On cloudy days the solar panels may share some visual characteristics with the pale tone and large scale of these buildings although they would be clearly separated by an area of countryside.

Construction processes would introduce machinery, built structures and excavations and would be clearly visible across the parts of the Site which are visible, albeit temporarily.

The proposed infill and management of the hedges, and the tree planting proposed on the west side of F7, F10 and F13 would filter or screen views to parts of the closer solar panels over time in winter and summer. Internal



additional hedges across the Site would tend to become fuller and taller, and additional trees located within the northern part of the Site would increase the presence of trees in the middle distance. These would be planted as heavy standards to provide some filtering of views at Year 1. Within the first five years, existing and proposed hedges would provide screening, and over time the visual prominence of the solar farm would reduce, although areas of solar panels would remain clearly visible, particularly in winter. During periods of leaf cover, the view would take on a more wooded and generally vegetated character, strengthening the presence of existing hedges, hedge trees and small woodland blocks that already exist within the Site. The increased heights of hedges and numbers of hedge trees are in character with and would strengthen the character of Settled Plateau Farmland Slopes LCT.

Effects on recreational users of the path would be significant and adverse during the temporary construction period and the operational period up to approximately five years when hedges would have grown sufficiently to have an effect on screening and softening views to the solar panels closest to the viewer and across the Site generally. Visual effects would continue to decrease over time with the growth of the proposed trees.

Sensitivity	Recreational Users: High			
	Construction	Year 1	Year 5	Year 15
Magnitude of Change	Medium	Medium	Medium-Low	Medium-Low
Greatest Level of Visual Effect	Major/Moderate, adverse significant	Major/Moderate, adverse significant	Moderate, adverse not significant	Moderate, adverse not significant

Additionally, following comments received from Design Midlands, it was noted that there was a 'double hedgerow' effect illustrated in the photomontage of Viewpoint 2 (VP2) at the entrance to the site which is not characteristic of the area. This issue has since been resolved and an updated VP2 photomontage can be found as Appendix E of the Addendum Report.



6. Response to Comments received from Conservation Officer

Following the meeting with the Planning Case Officer, Design Midlands, SBC Conservation Officer, the Applicant and the Agent on the 14th November 2024, the Applicant confirmed they were happy to accept a condition relating to the detailed design of the CCTV cameras and fencing as per the below comment received in the Conservation Officer's response dated 27th September 2024:

"In addition to the mitigation measures requested in these comments, I would also request that the CCTV camera poles be reduced from 4m in overall height to no more than 2.5m in overall height, which has been the standard height for CCTV camera poles on other solar farm applications in Stafford Borough. All CCTV cameras, their poles and the galvanised security and palisade fences to the compounds should have a dark colour finish such as black or dark green as opposed to the standard steel galvanised finish which is out of keeping with the rural landscape and would make them unnecessarily visually obtrusive - this can be secured by condition if the case officer/committee is minded to approve the proposed development."

In addition to this, the Applicant is happy to accept a condition for the requirement of heavy standard trees to be planted to the northwestern corner at Field 1 as requested by the Conservation Officer in the above-mentioned meeting. The location of this planting can be found in the updated Figure 19: Landscape and Ecology Management Plan (LEMP) and Figure 20: Landscape and Ecology Management Plan (LEMP) Enlargement found as Appendix F of the Addendum.



7. Heritage Statement Addendum

In response to the other comments received from the Conservation Officer, please see below.

7.1 Introduction

This section of the addendum should be read in conjunction with the Historic Environment Assessment (HEA), Heritage Archaeology, 2023.

Conservation Officer comments have been received (27 September 2024 consultee comments). The comments outline their concerns with the proposed scheme and sets out that in their assessment the scheme would result in a harmful effect on the significance of non-designated built heritage assets at Lower Gorsty Birch Farm and Higher Gorsty Birch Farm. They conclude that *“There is currently a conservation objection to the application in its current form, however it is deemed that this could be adequately resolved through additional landscape mitigation measures as recommended in these comments.”*

This section of the addendum has been prepared in response to the comments received, and addresses points referenced by the conservation officer in reaching the above conclusion

Also, since the Historic Environment Assessment was drafted, the National Planning Policy Framework has been revised, in December 2024. The changes do not materially alter the historic environment assessment, however the paragraph numbers referenced have been updated and the relevant paragraphs are as follows:

- Paragraph 207: An applicant should describe the significance of any heritage assets affected by a planning application, the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- Paragraph 212: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- Paragraph 213: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- Paragraph 215: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- Paragraph 216: In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.



- Paragraph 218: Local Planning Authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact.

7.2 Description of the Heritage Asset

Lower Gorsty Birch Farm and High Gorsty Birch Farm are described in the HEA as follows:

- *Para 5.3: Asset IDs 11 and 12: Lower and Higher Gorsty Birch Farmsteads, these are historic farms shown on the tithe and first edition Ordnance Survey mapping. The tithe apportionment for Stallington (1848) records the owner of Lower Gorsty Birch as Charles Harway and the occupier as James Farrall. The 1851 census records a James Farrall at Stallington Farm, a farmer of 84 acres. James Farrall is also listed as the occupier for some of the land within the northern part of the Site. These assets have a degree of aesthetic and historic value, but have been extended and altered since the 19th century and they are of low value.*
- *Para 5.12.4: Non-designated Lower Gorsty Birch is approximately 250m to the north west of the Site. Its historic and aesthetic value includes its association with the land farmed by its inhabitants and the rural surroundings in which it is experienced. The surrounding agricultural fields that can be viewed from or with the historic building therefore make a positive contribution to appreciating its heritage value. The Site is in part of this setting.*

Image 7.1: Lower Gorsty Birch Ordnance Survey 1:2,500 1899ⁱ and modern aerial image, showing modern buildings to east and southeast of historic farm stead

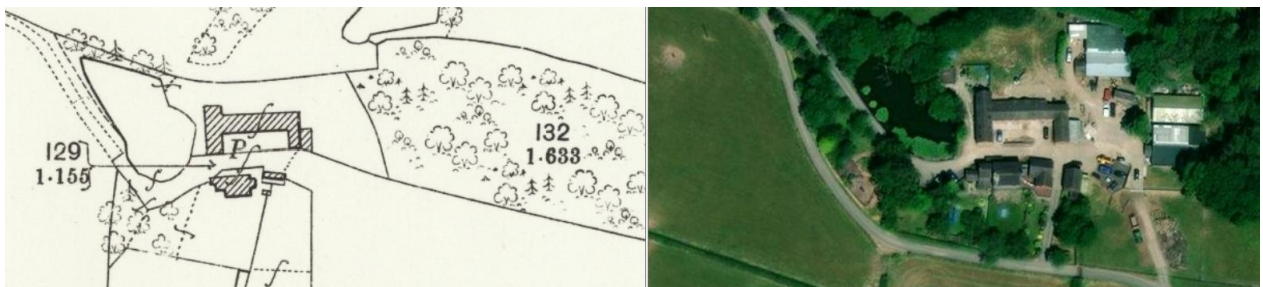


Image 7.2: Higher Gorsty Birch, Ordnance Survey 1:2,500 1899 and modern aerial image, showing modern buildings to east of historic farm stead



Lower Gorsty Birch is a 19th century farmstead with a regular courtyard plan and a range of historic buildings including a detached farmstead, these historic buildings appear to be substantially intact, although there are also a number of modern agricultural buildings to the east. The conservation officer notes that these have not interfered with the traditional range of farm buildings which have been converted to holiday lets. Similarly, Higher Gorsty Birch is a 19th century farmstead with a regular courtyard plan and a high rate of survival of the traditional farm buildings. The L shaped barn has been converted to a house.

Both are recorded as non-designated heritage assets by the Staffordshire Historic Environment Record and these are assets that hold a degree of heritage value, both architectural and historic. The settings of these assets includes agricultural land in which these buildings are experienced, which makes a positive contribution to appreciating the heritage values of these assets.

7.3 Assessment of Effects

Given the distance of separation (which preserves all of the agricultural land immediately surrounding the farmstead) and lack of intervisibility due to the distance of separation, intervening mature trees, hedges and modern farm buildings, Higher Gorstybirch Farm was not taken forward to a 'Step 3' assessment within the HEA. A neutral effect is recorded.

The HEA records the effect in relation to Lower Gorsty Birch as follows:

- *Para 6.11: Non-designated Lower Gorsty Birch is approximately 250m to the north west of the Site. The northern fields of the Site forms part of this setting, however, not all of the asset's setting includes the Site. Most of the Site lacks any intervisibility with Lower Gorsty Birch, as a result of the intervening mature vegetation and topography, and also the modern farm buildings situated between the historic building and the Site. The ability to appreciate the rural context of Lower Gorsty Birch would be largely preserved and the contribution made by setting to its heritage values largely unaltered. The predicted effect is of negligible magnitude and significance.*

The conservation officer reaches the conclusion that “*in summary, by virtue of the industrialisation of the character of the historic open and rural landscape and setting of Lower Gorsty Birch Farm and Higher Gorsty Birch Farm, non-designated heritage assets, with insufficient mitigation, the proposed development is contrary to Policies N1, N8 and N9 of the Plan for Stafford Borough, it is also contrary to paragraph 209 of the National Planning Policy Framework 2023.*”

7.4 Scale of Effect and Design of the Proposed Development

The proposed development comprises a solar farm and associated infrastructure within a site area of 69.21 hectares. The landscape design includes retention of the hedgerows within and bounding Fields 1 and 3, which are the closest to Lower Gorsty Birch and Higher Gorsty Birch, with a grassland buffer along the north-south aligned western boundary to those fields. Also, tree planting is proposed along the northern boundary of Field 1 and southern boundary of Field 3, and within Field 3.



The design of the development included consideration of historic environment constraints and includes the retention of historic landscape features within the proposed layout, such as existing trees, hedgerows and woodland areas.

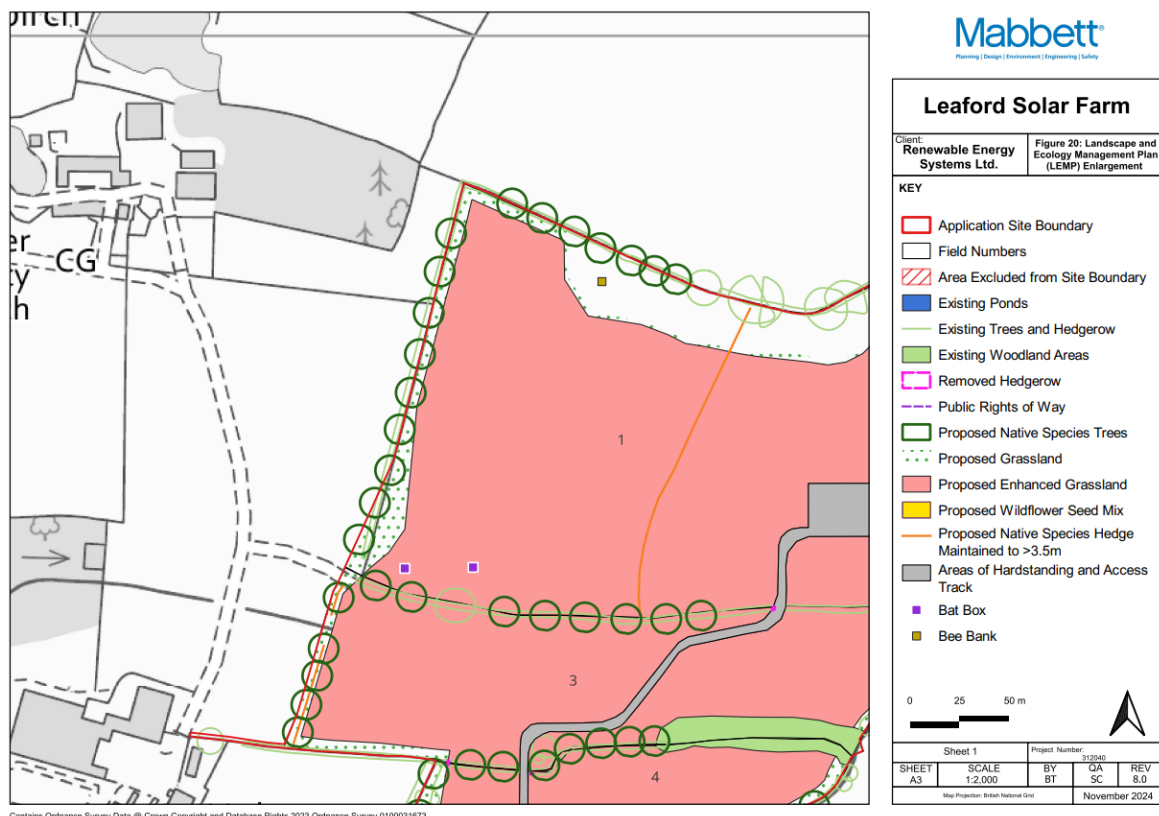
Consequently, the topography and intervening (retained) mature trees and hedgerows within and surrounding the site is such that only parts of the site will be visible in views of and from Lower Gorsty Birch Farm.

However, in response to the recommendations from the conservation officer, further landscape measures are proposed, comprising:

- Tree planting along the hedgerow forming the western boundary of Field 1, heavy standard trees are proposed in the north west corner of Field 1;
- Tree planting along the hedgerow between Field 1 and Field 3; and
- Planting a native species hedgerow within Field 1, along the line of the hedgerow depicted in historic mapping.

Please see Image 7.3 below taken from the Landscape and Ecology Management Plan (LEMP) (revision 8.0) depicting this planting mitigation. The latest version of the LEMP has been included in the addendum submission.

Image 7.3: Proposed Additional Landscape Planting



The following conclusions take these additional landscaping measures, as set out above, into consideration and also the comments made by the conservation officer in their consultation response.

The HEA concluded an effect of negligible significance in relation to Lower Gorsty Farm and a neutral effect in relation to Higher Gorsty Farm. The HEA included consideration of the relative heritage values of these assets, which was concluded to be low on a relative scale where high is generally equivalent to assets that hold national significance and low are generally assets of a more common type or less well preserved that are significant at a local level.

The heritage value of the assets relates to (a) their historic built form and fabric (the buildings themselves), (b) the building groups and intervisibility between them, and (c) the broader historic context of these formerly agrarian buildings derived from the agricultural land in which they are experienced. It is only the third of these elements (c) that would be impacted by the proposals, and then only to a limited degree, with neither asset encircled by development or immediately adjoining it, both have a degree of separation and limited views to and from parts of the proposed development, with large areas of their rural surroundings unaffected. The degree of intervisibility is greater for Lower Gorsty Birch than for Higher Gorsty Birch. It is also the case that while the proposals would change the landscape from agricultural land to a solar farm, this includes a landscaping scheme and throughout the operational phase, the land beneath and between the solar arrays will be used for agriculture (e.g. sheep grazing).

7.5 Conclusion

The LVIA material was cross referenced in undertaking the HEA, and updated material has been considered in preparing this addendum. However, it is noted that the receptors of each study are different, and consequently different levels of effect are likely to be reached. The relevant guidance on assessing effects on the setting of heritage assets is set out in Historic England Guidance Note 'The Setting of Heritage Assets' (ed. 2, 2017, 'GPA3'). This guidance sets out that *"Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all"* (paragraph 14).

Paragraph 202 of the NPPF sets out that heritage assets should be *"conserved in a manner appropriate to their significance"*, while paragraph 208 also notes that *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal."* Relative significance (or heritage value) is therefore important to assessing the impacts of development on the historic environment.

The Higher and Lower Gorsty Birch are non-designated heritage assets. They are buildings of a type that is well represented and they are of low heritage value.



The planning balance set out in paragraph 216 of the NPPF directs the decision maker that *“In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*. Here, both the scale of harm in terms of impacts to the heritage values of the assets, and the significance of the heritage assets, is low. In assessment terms this is an effect of negligible significance, to be weighed against the benefits of the proposals. The proposals are not therefore contrary to the policy provisions of the NPPF.

The relevant local plan policy in relation to heritage assets is N9, which requires that *“Development and advertisement proposals will be expected to sustain and, where appropriate enhance the significance of heritage assets and their setting by understanding the heritage interest, encouraging sustainable re-use and promoting high design quality. All potential loss of or harm to the significance of a heritage asset, including its setting, will require clear justification”*. The policy requires harm to be justified by considering (among other things) the settings of heritage assets. This consideration is demonstrated by the mitigation embedded into the original design of the development, and the additional mitigation which has now been included in the updated landscape plan in response to the comments received from the conservation officer.

The conservation officer also refers to local plan policies N1 (design) and N8 (Landscape Character). In relation to policy N1, the Proposed Development is consistent with the policy aims and particularly with part f. *“Retention of significant biodiversity, landscaping features, and creation of new biodiversity areas that take into account relevant local information and evidence”*. In relation to N8, historic environment considerations, the Proposed Development is again consistent with the aims of the policy in so far as retaining heritage assets and historic elements that contribute to the landscape character. The design has also been carefully considered and refined to reduce effects on the settings of heritage assets as far as reasonably practicable.

It is therefore consistent with both national and local policy that the negligible effect on a non-designated heritage asset could be determined positively when balanced against the benefits of the proposal.



8. Figure 18 – Sheep Handling Facility

The Applicant would kindly request that Stafford Borough Council remove Figure 18 - Sheep Handling Facility (05004-RES-PRO-DR-PT-001) from the live planning application as this specific facility is no longer applicable.



9. Updated Figures

Following discussions and feedback from consultees and the case officer, the following figures have been updated and can be found as Appendix G, H, I and J of the Addendum Report:

- Figure 1: Site Location Plan (Rev 4) (drawing number: 05004-RES-LAY-DR-PT-002).
- Figure 2: Site Location Map (Rev 3) (drawing number: 05004-RES-LAY-DR-PT-003).
- Figure 4: Infrastructure Layout (Rev 8) (drawing number: 05004-RES-LAY-DR-PT-004).
- Figure 5: Infrastructure Layout Enlargement (Rev 7) (drawing number: 05004-RES-LAY-DR-PT-005).

The infrastructure layout updates have taken into the account the following amendments following discussions/comments received from the Conservation Officer, SBC Tree Consultant, Design Midlands and the Case Officer:

- Solar panels have been removed from all locations detailed on Page 2 of the Planning Consultation – Tree Response dated 07/08/2024;
- A further setback of approximately 37m in Field 17 was implemented following comments received from Design Midlands dated 27/08/2024;
- Some panels have been removed in Field 1 following the amendments to the LEMP where inclusion of a hedgerow reinstating the historic field boundary was recommended by the Conservation Officer and has been implemented; and
- The AC-AC storage compound has been removed from the layout.



10. National Planning Policy Framework (NPPF) Update

10.1 Introduction

Since the Leaford Solar Farm planning application was submitted to Stafford Borough Council, there have been important changes to the National Planning Policy Framework (NPPF), published on the 12th December 2024, which are summarised below. These changes include new policy in relation to Green Belt, which will be covered in section 10.4 of this addendum.

10.2 NPPF December 2024 Update

Paragraph 161, Section 14 ‘Meeting the Challenge of Climate Change, Flooding and Coastal Change’ states that *“the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change”*. The inclusion of a definitive net zero 2050 target will require projects like Leaford Solar Farm, and many more, to be consented, to enable them to play a critical role in the future energy mix.

Paragraph 164 of the updated NPPF discusses how *“new development should be planned for in ways that:*

- a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and*
- b) Help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government’s policy for national technical standards.”*

A Flood Risk Assessment & Drainage Strategy was submitted alongside the planning application which details the way in which the Proposed Development would facilitate the implementation of sustainable urban drainage systems (SUDS). In addition, details have been provided in Section 2 below to explain how swales can be used to provide additional water storage. The specifics of the drainage systems can be conditioned, with more information provided and agreed at the detailed design stage.

Additionally, the very nature of the Proposed Development would make a significant contribution towards meeting climate change targets set by the UK Government. It will have a maximum generation capacity of 30MW which has the potential to power up to 8,000 UK homes per year, with a carbon offset of approximately 16,900 tonnes/year, or 676,000 tonnes over the lifetime of the project.

Furthermore, Paragraph 168 states that *“when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should expect new development to:*



- a) *Not require applicants to demonstrate the overall need for renewable or low carbon energy and give **significant weight** (our emphasis) to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future."*

As highlighted in bold in the quote above, this amendment gives significant added weight to renewable energy proposals in the planning balance, highlighting the step change necessary to deliver these much-needed renewable energy projects and enabling the country to achieve the ambitious net zero targets

Paragraph 188, in relation to conserving and enhancing the natural environment, outlines that *"plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries"*. As detailed in the Preliminary Ecological Appraisal submitted alongside the original planning application, no adverse impacts are anticipated at any designated sites.

Regarding footnote 65, the new NPPF has also omitted the following wording from footnote 65 (formerly 63) a previous footnote: *"the availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development"*. The removal of the text in this footnote does not change this commitment from Government but makes the position clearer.

The Agricultural Land Classification (ALC) Survey undertaken for the Proposed Development found that the majority of the land at the site is Grade 3b (95.68%) with only a small area within the Application Site boundary consisting of Grade 3a (4.32%) located in Fields 9 and 12. The Proposed Development complies with these amendments, with the vast majority of the site being not Best and Most Versatile (BMV) land.

10.3 Clean Power 2030 Action Plan

Following publication of the revised NPPF in December 2024, the Government also released the Clean Power 2030 (CP30) Action Plan: A new era of clean electricity.

The Action Plan highlights that achieving clean power is now a wider goal and is fundamental to growing the economy and both improving national security and standards of living. The document identifies the urgency required in enacting policy by *"sprinting to clean, homegrown energy"*, placing delivering clean power by 2030 at the heart of one of the Prime Minister's five missions and the Plan for Change.

The Action Plan outlines three major challenges: *"the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change."* There is a clear



link made between the steps to tackle energy security and climate change, and the potential economic benefits from employment and investment in the energy industry, assisting the national plan for growth. The document (page 20) refers to the Clean Power 2030 action plan *“Playing a key part in supporting hundreds of thousands of jobs, as part of the wider transition to net zero”*.

The Government have clearly stated their ambitious target of 45-47 GW solar before 2030 within the Action Plan. It is obvious from this document that the Government acknowledges that renewable energy development is going to be increasingly more crucial for national and international targets to reach net-zero.

The plan also outlines the role of a clean power system in meeting net zero by 2050. In this it is noted that *“By 2050, annual electricity demand is likely to at least double as a result of electrification”*.

In terms of the need to act immediately and take advantage of the opportunity for renewable energy to connect where grid capacity is present, the Action plan states at page 50 *“There is particular urgency to accelerate the planning process across Great Britain for energy infrastructure since we do not have long for many clean power projects to begin construction if they are to be operational for 2030”*. In relation to existing network constraints and steps to deliver the decarbonised power system by 2030, the Action Plan states (page 63) *“Wherever renewables can connect to the distribution network, this should be encouraged for reasons of speed and efficiency.”*

The Government’s Action plan looks to the planning sector to be one of the key aspects of supporting progress, stating that *“Accelerating clean infrastructure projects through the planning system is critical to achieving our goal and unleashing investment to support the Prime Minister’s Growth Mission. Our capacity range will ensure that planners and statutory consultees at the national and local level have a clear sense of which projects to prioritise for consideration and, where appropriate, fast-track through the process to enable decisions on consent to be taken sooner”* (page 36).

The Action Plan includes addressing planning and consenting as a measure for removing roadblocks to enable consenting regimes to bring new projects through the system at pace. It is stated that *“Our planning system needs to quickly change to enable government’s missions to grow the economy and deliver clean power”*. The plan states *“There is particular urgency to accelerate the planning process across Great Britain for energy infrastructure since we do not have long for many clean power projects to begin construction if they are to be operational for 2030, especially networks and offshore wind developments.”* (pages 49 and 50)

Reform of locally consented decision making is proposed to deliver clean power by 2030. The Action Plan identifies that the NPPF does not make clear that local planning authorities should *“consider the benefits associated with renewable energy generation, and proposals’ contribution to meeting a net zero future when determining applications for these developments”*. Please note that the revision to the NPPF in December 2024 incorporates this into the new Paragraph 168 (a) as discussed above.



It is also stated that the Planning Practice Guidance for renewable energy “*requires updating to reflect new policies*” (page 54). The Government states that this will be updated in 2025 to provide clarity on the application of planning policy (page 56).

In relation to the electricity networks and grid connections, the Action plan acknowledges that grid infrastructure requires strengthening, with a requirement for “*unprecedented expansion*” (page 62). Whilst the process of network improvement is needed to reduce network constraints, the Action Plan confirms that “*Whenever renewables can connect to the distribution network, this should be encouraged for reasons of speed and efficiency*” (page 63).

It should be noted that in the context of the Clean Power 2030 Action Plan, the Proposed Development has a grid offer with the Local Distribution Network Operator, and an energisation date of 2027.

10.4 Green Belt/Grey Belt

No further material has been requested by Statutory Consultees in relation to the Green Belt and the appropriateness of the development within it. This is indicative that the Green Belt Assessment already provided, and the outcomes of the technical reports that support the planning application, allow for the Very Special Circumstances test to be passed.

However, further to the changes noted above in the new NPPF, and to keep up to date with the most current policy documentation, it should be noted that there has been the introduction of a new term. Namely, Grey Belt.

For completeness, we will now explore Grey Belt in relation to the proposed development.

Grey Belt has been defined within the Glossary of the NPPF (Annex 2) as follows:

*“For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not **strongly contribute to any of purposes (a), (b) or (d) in Paragraph 143.**(our emphasis) ‘Grey Belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”*

Footnote 7 of the NPPF, states that:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”



This footnote is therefore related to the habitats sites stated within it, (and those sites listed in Paragraph 194 namely “*potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites*”) and footnote 75 (*non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets*”).

The Proposed Development does not sit within any of these areas or sites, and there are no significant impacts as per the conclusions of the specialist reports submitted as part of the planning application. Therefore, it can be considered that the site falls within the definition of Grey Belt.

Paragraph 143 of the NPPF remains unchanged. The full list of the five purposes of the Green Belt, can be seen below:

- a) *“To check the unrestricted sprawl of large built-up areas;*
- b) *To prevent neighbouring towns merging into one another;*
- c) *To assist in safeguarding the countryside from encroachment;*
- d) *To preserve the setting and special character of historic towns; and*
- e) *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

As per the Green Belt Assessment submitted as part of the planning application, purposes (a), (b) and (d) were all assessed as having low impact on the Green Belt and therefore do not “*strongly contribute to purposes (a), (b) or (d) from Paragraph 143 of the NPPF.*”

For ease of reference the Table 1.1 below is repeated from the Green Belt Assessment submitted alongside the planning application. This illustrates the Proposed Development assessed against the defined purposes of Green Belt.

Table 1.1: The Proposed Development assessed against the defined purposes of Green Belt

Purpose	Assessment	Impact on Green Belt
Purpose 1: To check the unrestricted sprawl of large built-up areas.	Urban sprawl will occur when new development is proposed on the urban fringe of settlements. The Application Site is located in a countryside location approximately 2.5km to the southeast of the closest significant urban settlement of Stoke, Small village settlements surrounding the Application Site includes Fulford located approximately 0.5km to the southwest, Stallington located approximately 0.5km to the northwest and Saverley Green located approximately 0.3km to the east of the Application Site at its closest. The Application Site is a greenfield site within the designated Green Belt.	Low



	The Proposed Development would effectively preserve openness and prevent urban sprawl, acting as a barrier to urban development. Furthermore, consent is being sought for 40 years after which the components at the Application Site will be removed and returned as close as practicable to its original condition. Therefore, the Proposed Development will not be a permanent addition to the countryside location.	
<p>Purpose 2:</p> <p>To prevent neighbouring towns merging into one another.</p>	<p>The Proposed Development does not represent a typical “bricks and mortar” development that would contribute towards the merging of the neighbouring towns of Cheadle, Stone or Blythe Bridge into one another physically or visually.</p> <p>In addition, the consent for the Proposed Development is being sought for a temporary period of 40 years. One of the benefits of solar farm developments is the reversible nature of such developments. Following the end of the operational phase, the components of the Proposed Development would be removed and recycled where appropriate, with the land returned as close as practicable to its original condition.</p>	Low
<p>Purpose 3:</p> <p>To assist in safeguarding the countryside from encroachment</p>	<p>It is acknowledged that the Proposed Development is located on greenfield land, however it is unlikely to result in significant encroachment on the surrounding countryside. A countryside location is required for the viability of the Proposed Development, including the availability of a large parcel of land with minimal environmental and technical constraints, located within close proximity to a viable and available grid connection. In this case, the Forsbrook Substation, located to the northeast of the Application Site. Furthermore, the Proposed Development has been designed in order to ensure that the existing hedgerow and trees at the site are retained and enhanced in order to be utilised as natural screening in the surrounding area, further protecting the local countryside from encroachment.</p>	Moderate
<p>Purpose 4:</p> <p>To preserve the setting and special character of historic towns</p>	<p>The Proposed Development would not significantly affect the setting and special character of Fulford and its Conservation Area due to the physical distance of approximately 0.5km between the Application Site and the village, as well as the topography which forms a ridge line, the trees already in situ and the proposed planting located between the Application Site and the village.</p>	Low
<p>Purpose 5:</p> <p>To assist in urban regeneration by</p>	<p>The Application Site is not located within an area of derelict or urban land and therefore does not assist with urban regeneration. As discussed in the Green Belt Assessment, there are also no suitable</p>	Negligible



encouraging the recycling of derelict and other urban land.	areas of brownfield land within Stafford Borough Council that could accommodate the Proposed Development.	
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Paragraph 153 of the new NPPF highlights that *“when considering planning applications, Local Planning Authorities (LPAs) should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness (footnote 55). Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very exceptional circumstances. ‘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.”*

Footnote 55: *“other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.”*

Paragraph 155 then goes on to outline that *“the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where;*

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.”*

Considering purpose (c) of Paragraph 143 on ‘encroachment’, it is acknowledged that the development will result in some degree of harm. However, within the context of Stafford Borough Council, it is noted from the Stafford Borough Local Plan 2020-2040 that the council covers nearly 230 square miles. Of this, there are two areas of Green Belt in the Borough; North Staffordshire Green Belt (covering extensive parts of the north of the Borough) and West Midlands Green Belt (covering parts of the south-eastern area of the borough). The Application Site is located within North Staffordshire Green Belt. North Staffordshire Green Belt equates to some 44,400 Hectares in extent whereas the Proposed Development equates to approximately 69.21 Hectares. Therefore, the Proposed Development would result in a temporary encroachment of approx. 0.0016% of the Green Belt within the Borough. This is not considered to be a significant impact.

It follows therefore that in consideration of both the definition of Grey Belt and the wider Green Belt context, the Proposed Development will clearly not fundamentally undermine the purposes of the remaining North Staffordshire Green Belt within the Borough. Therefore, it can be concluded that criterion (a) of Paragraph 155 has been met.



Furthermore, when considering criterion (b) of Paragraph 155 and the unmet need for this type of development, it is no longer required that the need for renewable energy must be demonstrated and evident from the “*significant weight to the benefits associated with renewable and low carbon energy generation*” that must now be given to schemes like the Proposed Development, that there is a clear direction of travel towards a greater reliance on renewable energy generation by Government (both points as stated within NPPF Paragraph 168 (a)). The proposed development therefore clearly meets criterion (b).

With regards to criterion (c) of Paragraph 155 on transport sustainability, there are no objections from relevant statutory consultees on this matter; accordingly, the Council accepts that the proposal is satisfactory in this regard. Paragraph 110 of the NPPF states that:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

Once operational, the Proposed Development will only generate a small number of journeys to the site for maintenance purposes, likely around once a month. Therefore, the effects of the proposal on reducing congestion and emissions and improving air quality and public health as a result of traffic movements are likely to be very limited. With regards to Paragraph 115 of the Framework, this states:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a. Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b. Safe and suitable access to the site can be achieved for all users;*
- c. The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d. Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”*

It is considered in relation to Paragraph 115 (a) that the sustainable transport options have been prioritised, taking account of the nature of the proposal and its suitable location. This meets criterion (c) of Paragraph 155.



Finally, the 'Golden Rules' are applicable more broadly to residential development. Therefore, Paragraph 155 (d) is not considered to be applicable to the Proposed Development.

In conclusion, noting the definition of Grey Belt, it is considered that the Proposed Development meets this definition and in accordance with Paragraph 155. The proposal would not constitute inappropriate development and does not require the demonstration of Very Special Circumstances, as demonstrated in the recent Baird Decision at Great Barr, Walsall (Appeal Reference APP/V4630/W/24/3347424). This Appeal has been included as Appendix K of the Addendum Report.

Nonetheless, in the event that it is not agreed that the Proposed Development should be considered Grey Belt, and that the Very Special Circumstances balance is required, this bar has been demonstrated to be met in the Green Belt Assessment submitted alongside the original planning application.

10.5 Conclusion

In conclusion, the latest update on the NPPF, and the new Clean Power 2030 Action Plan highlight a strengthening in position from the Government's views in favour of the Proposed Development and other renewable energy projects, especially those which can connect to the grid system swiftly. The updated NPPF emphasises that **significant weight** should be given to the benefits associated with renewable and low carbon energy generation which have been sufficiently demonstrated in the planning application and associated addendum documents submitted alongside the Leaford Solar Farm application.



11. Conclusion

In conclusion, this addendum has provided the additional information and amendments required for the Leaford Solar Farm planning application as per responses received from Statutory Consultees and discussions with Case Officer Vanessa Blake.

We look forward to receiving responses on the submitted addendum documentation in due course.

