

Project No: 312040

Planning Statement – Leaford Solar Farm

Prepared for:



Renewable Energy Systems Ltd.

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This report has been prepared for the sole and exclusive use of Renewable Energy Systems Ltd. in accordance with the scope of work presented in Mabbett & Associates Ltd (Mabbett) Letter-Agreement (312040/LA/SB/pb Rev 5.0), dated 30th January 2023. This report is based on information and data collected by Mabbett. Should any of the information be incorrect, incomplete or subject to change, Mabbett may wish to revise the report accordingly.

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Section 1.0: Introduction

1.1 Planning Application

Renewable Energy Systems Ltd. (herein the Applicant) is applying to Stafford Borough Council (SBC) for full planning permission for the construction and operation of Leaford Solar Farm and its associated infrastructure (herein the Proposed Development). The proposed solar farm would include integrated energy storage to help increase the flexibility and generation opportunities of the site. The Proposed Development would comprise the construction and operation of a maximum generation capacity 30MW solar array and its associated infrastructure on a site of 69.21 hectares, on land to the northeast of Fulford, between Stallington and Saverley Green, Staffordshire, approximately centred on grid reference 395651, 339248.

The description of the Proposed Development is as follows:

“Construction and Operation of a solar farm with all associated works, equipment, necessary infrastructure and biodiversity net gains.”

1.2 Planning Application Submission

In addition to the completed application forms and certificates, the planning application is supported by technical and environmental assessment reports, including the following:

- Planning Statement (this report);
- Green Belt Assessment;
- Design and Access Statement;
- Statement of Community Involvement;
- Landscape and Visual Impact Assessment;
- Preliminary Ecological Assessment;
- Biodiversity Net Gain Assessment;
- Flood Risk Assessment and Drainage Strategy;
- Cultural Heritage Impact Assessment;
- Geophysical Survey Report;
- Transport Statement;
- Glint and Glare Assessment;
- Noise Assessment;
- Agricultural Land Classification Report; and
- Tree Survey Report.

The planning application is supported by the following technical drawings:

- Figure 1: Site Location Plan (Drawing Number: 05004-RES-LAY-DR-PT-002)
- Figure 2: Site Location Map (Drawing Number: 05004-RES-LAY-DR-PT-003)
- Figure 3: Field Numbers
- Figure 4: Infrastructure Layout (Drawing Number: 05004-RES-LAY-DR-PT-004)
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1.3 The Applicant

Renewable Energy Systems Ltd. (RES) is the world's largest independent renewable energy company which has delivered more than 23GW of renewable energy projects across the globe. RES is active in 14 countries working across onshore and offshore wind, solar, energy storage and transmission and distribution.

RES has developed a rigorous site selection process in order to ensure that only the best projects are developed, and such projects are able to be sensitively integrated into the wider landscape, encouraging the protection and enhancement of the environment.

1.4 Scope of Planning Statement

This Planning Statement has been prepared by Mabbett and Associates Limited (Mabbett) on behalf of the Applicant to assess the extent to which the Proposed Development complies with relevant national and local planning policies and any other material considerations. The remainder of this Planning Statement is structured as follows:

- Section 2.0: Application Site & Surrounding Area;
- Section 3.0: Proposed Development;
- Section 4.0: The Development Plan;
- Section 5.0: National Planning Policy and Other Material Considerations;
- Section 6.0: Planning Policy Assessment;
- Section 7.0: Need for the Proposed Development; and
- Section 8.0: Summary and Conclusion.

Section 2.0: Application Site and Surrounding Area

2.1 Introduction

This section details the location of the Application Site and the surrounding area. It also provides a description of the Application Site and how this is proposed to be accessed from the local road network. This section of the Planning Statement also discusses the planning history of the Application Site and details any solar PV developments within 5km of the Proposed Development. Furthermore, this section details the site selection process for the Application Site by the Applicant.

2.2 Application Site Location and Surrounding Area

For the purposes of this Planning Statement, the term ‘Application Site’ refers to the red line illustrated on the Location Plan, submitted with the planning application.

The Application Site is located on land to the northeast of Fulford, between Stallington and Saverley Green, Staffordshire. The surrounding area is characterised by a combination of agricultural, residential and industrial uses. The closest residential area to the Application Site is the village of Saverley Green which lies approximately 0.3km to the east of the Application Site at its closest. The village of Stallington lies approximately 0.5km northwest of the Application Site at its closest, the village of Fulford lies approximately 0.5km to the southwest at its closest and the village of Blythe Bridge is situated approximately 0.5km to the north at its closest.

The A50 is situated approximately 0.5km to the north and east and runs between the Application Site and Blythe Bridge. Saverley Green Road runs adjacent to the Application Site’s southern boundary.

2.3 Application Site Description

The Application Site comprises 69.21 hectares (Ha) of agricultural land which forms part of Little Leacroft Farm and Fulford Hall Farm. The land within the Application Site is divided into 19 fields, which are largely bound by well-established and mature hedgerows, woodland and trees. Field numbers are illustrated on Figure 3: Field Numbers. To the north of the site, a 33kV overhead line runs in a west-east direction crossing Field 2 and Field 3. In addition to this, there are two 11kV overhead lines that cross the site towards the middle of the Application Site boundary; one of these flows in a northwest-southeast direction and crosses Fields 5, 6, 8 and 9 and the other line flows in a southwest-northeast direction and crosses Field 12 and Field 14.

According to the Cranfield University Soilscales Map¹, the soil within the Application Site comprises “*slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils*”. According to Natural England Provisional Agricultural Land Classification (ALC) Map², the land within the Application Site comprises Grade 3 land. An Agricultural Land Classification Report was submitted alongside this planning application. The report determined that 95.68% of the Application Site is Grade 3b and 4.32% is Grade 3a land. The Proposed Development largely avoids development in Grade 3a land, which is considered best and most versatile land, with only small areas in Field 9 and Field 12 of Grade 3a being utilised for development.

The Application Site comprises grassland divided by hedgerows with areas of woodland and trees present. The land within the Application Site is gently undulating, south-facing and ranging in elevation from approximately 165m above ordnance datum (AOD) in Field 3 to approximately 205m AOD in Field 11. Critically, the development will not alter the topography of the site.

2.4 Accessibility

Little Leacroft Farm currently has multiple access points to the Application Site through Fields 1, 3 and 5 and Fulford Hall Farm currently has an access point into the Application Site at Field 13. Due to the

¹ Cranfield Soil and Agricultural Institute. Soilscales. Available online: <http://www.landis.org.uk/soilscales/>

² Natural England, Provisional ALC Map. Available online: <https://naturalengland-defra.opendata.arcgis.com/datasets/provisional-agricultural-land-classification-alc-england?geometry=-1.582%2C54.587%2C-1.543%2C54.596>

standard of road and need for HGVs to enter the Application Site during construction, these access points were considered less suitable for use as the vehicular access point to the Application Site during construction.

The proposed point of vehicular access to the Application Site is at the southern boundary, taken from Saverley Green Road. The access will take the form of a simple priority junction.

Details of this can be found within the Transport Statement submitted alongside the planning application.

2.5 Planning History of Application Site

A search was undertaken in August 2023 of any existing and/or approved developments located within the boundary of the Application Site using the Stafford Borough Council planning search facility. No planning history was found at the Application Site. Table 2.1 below details the information found in relation to solar PV developments within a 5km vicinity of the Application Site using the Stafford Borough Council, Staffordshire Moorlands District Council and City of Stoke on Trent Council planning search facilities.

Table 2.1: Cumulative Search

Reference	Description of Development	Year Determined	Decision
Staffordshire Moorlands District Council			
SMD/2022/0466	Installation of Solar Panels on Flat Garage Roof 87 Hillesden, Caverswall Road, Blythe Bridge, Staffordshire, ST11 9BG. Located approximately 1.8km N.	2022	Grant
SMD/2014/0197	The erection of a solar photovoltaic (PV) array (11.5MW) and ancillary development. Located approximately 3km E.	2014	Grant
SMD/2012/1038	Installation of Solar Photovoltaic Panels at Ground Level (Retrospective) Upper Newton Farm, Draycott Road, Staffordshire, Upper Tean, ST10 4JN. Located approximately 2.65km E	2013	Grant
City of Stoke-on-Trent Council			
52978/FUL	Installation of solar PV panels to south facing roof Meir Park Day Nursery, Lysander Road, Meir Park, Stoke on Trent, ST3 7TW. Located approximately 2.5km NW.	2012	Grant

2.6 Site Selection

The Applicant undertook an alternative site analysis. The results of this determined that there are no viable alternatives to The Proposed Development within 5km of the grid point of connection. Please see Figure 1 of the Green Belt Assessment. As highlighted in Figure 1 of the Green Belt Assessment, the owners of three other sites were contacted for potential solar farm development, but the Applicant received no response from the relevant landowners.

The Stafford Borough Council Brownfield Land Register 2022³ was also considered when selecting a site for this development. The Applicant has reviewed the Stafford Borough Council brownfield register. There is just over 48 hectares of brownfield land spread across 23 different locations in the area, with an average area of 2 hectares. These are not practicable for ground-mounted solar projects. From the Land Register, all Part 1 sites detailed a minimum net dwelling number that would be expected for housing developments; all sites comprised previously developed land suitable, available and achievable for residential development. The remaining sites on the register do not have details specified but were all located within urban areas and settlements that are out with the 5km buffer of Forsbrook Substation.

³ Stafford Borough Council Land Register 2022 (December 2022). Available online: [Brownfield Land Register Site Plans 2022 \(staffordbc.gov.uk\)](https://staffordbc.gov.uk/brownfield-land-register-site-plans-2022)

As per the Town and Country Planning (Brownfield Land Register) Regulations 2017, brownfield land is designed to identify and promote brownfield land for residential development. Therefore, the location of the Proposed Development on an area of greenfield land ensures that the development is not in conflict with land that could otherwise be utilised for residential purposes.

Furthermore, the Application Site was deemed suitable for solar development for the following reasons:

- The Application Site has good solar irradiation levels.
- It lies outside of any statutory environmental, archaeological and landscape designations with a viable grid connection.
- It is bound by hedgerows and trees, allowing for natural screening of the Proposed Development.
- It maintains sufficient distance from potentially sensitive residential receptors.
- It maintains sufficient distance from potentially sensitive environmental receptors; and
- The Application Site abuts the local highway network, with access available from Saverley Green Road, located to the south of the Application Site.

Section 3.0: Proposed Development

3.1 Introduction

The Proposed Development comprises the construction and operation of a ground-mounted solar farm of a maximum generation capacity of 30MW with supporting energy infrastructure, associated site works and fencing and security measures.

The Proposed Development would be temporary, with an operational phase of up to 40-years, after which the Application Site would be returned to its current condition.

The layout of the Proposed Development is illustrated in the Figure 4: Infrastructure Layout (Drawing Number: 05004-RES-LAY-DR-PT-004) which has been submitted alongside the planning application.

3.2 Proposed Development

The key elements of the Proposed Development are detailed within Table 3.1 below. As part of the planning application package, typical drawings and plans have been submitted.

Table 3.1: Key Elements of the Proposed Development

Element	Description
Solar PV Arrays	<p>The Proposed Development comprises the installation of state-of-the-art polycrystalline solar photovoltaic (PV) modules. The modules ensure optimal use of solar irradiation and perform very efficiently at different angles to the sun. The PV modules will generate electricity with no air emissions, no waste production and no water use.</p> <p>The PV modules are fixed to a mounting structure (frame) in a fixed orientation to form arrays across the Application Site. These frames are strong, robust and not easily damaged, allowing them to withstand environmental pressures. The metal racks would be pile driven into the ground, and therefore would not require concrete foundations. This construction method limits the footprint associated with the Proposed Development and allows for the remaining land beneath and between the arrays to remain accessible so it can be utilised for livestock purposes, such as sheep grazing. Typically, this construction method only covers around 5% of the land for a solar farm.</p> <p>The PV modules would be supported on galvanized steel or aluminium support structure that is supported on embedded piles. The modules would be orientated to face the south at a range of panel tilts between 10° and 40°, subject to detailed design. The lowest point of the modules is approximately 0.7m above ground and is designed to allow sheep to graze underneath the arrays. The maximum total structure height will be approximately 3.5m. There will be a minimum clearance spacing between the rows of arrays of approximately 2m to avoid shading by adjacent arrays. Details of this are shown in Figure 8: Typical PV Module and Rack Detail (Drawing Number: 05004-RES-SOL-DR-PT-001).</p>
Battery Storage Enclosures	<p>Battery Energy Storage Systems (BESS) use batteries to store and distribute electrical energy. The energy that is stored in these containers can be drawn upon when needed to meet the demand for power.</p>

	<p>On the Infrastructure Layout (05004-RES-LAY-DR-PT-004) there is a standalone BESS Compound. This would contain battery storage enclosures, a PCS system, the customer substation building, an auxiliary transformer, LV distribution equipment, aggregation panels with LV pillar, a pre-insertion resistor, a spares container and lighting/CCTV columns.</p> <p>The Infrastructure Layout also shows battery storage units located throughout the Application Site next to the 9 inverter locations, located on areas with concrete footing surrounded by gravel, subject to detailed design.</p> <p>It is only intended to install battery storage units either adjacent to the inverters or within the standalone BESS Compound. Both have been presented here to allow the project the flexibility to respond to market requirements at the time of detailed design when further specifics will be confirmed.</p> <p>Details of this are shown in Figure 12: Typical Battery Storage Enclosure (Drawing Number: 05004-RES-BAT-DR-PT-001), Figure 14: Indicative BESS Compound Layout (Drawing Number: 05004-RES-LAY-DR-PT-006) and Figure 9: Typical Inverter and Storage Layout (Drawing Number: 05004-RES-SOL-DR-PT-002).</p>
Inverter Units	<p>Inverter units are required to control the voltage of the electricity generated by the Proposed Development, prior to reaching the substation.</p> <p>There would be 9 inverter units located on the Application Site.</p> <p>Details of this are shown in Figure 9: Typical Inverter and Storage Layout (Drawing Number: 05004-RES-SOL-DR-PT-002) and Figure 10: Typical Inverter Substation (Drawing Number: 05004-RES-SOL-DR-PT-003).</p>
DNO Substation	<p>A Distribution Network Operator (DNO) substation is required for the solar farm. The DNO substation contains the electrical switchgear, which comprises of disconnect switches used to control and protect the electrical equipment, as well as isolate the circuit if a fault occurs in the solar farm or on the local electricity distribution network.</p> <p>Details of this are shown in Figure 13: Client/DNO Substation Plan & Elevations (Drawing Number: 05004-RES-SUB-DR-PT-001).</p>
Onsite Cabling	<p>Cabling would connect the electrical infrastructure across the site. The cabling would be buried in trenches.</p>
Fencing & Security Measures	<p>Deer fencing would be constructed around the Application Site for health and safety and security reasons. The fencing is anticipated to be high tensile steel wire with hinge joints, with mammal gates included. Security fencing would be constructed around the proposed Client/DNO Substation, BESS Compound and Inverter and Battery Storage Area. This fencing is anticipated to be palisade or weld mesh and measure 2.0-3.0m in height, comprising a standard wire mesh fence on post foundation dependent on ground conditions. Subject to detailed design.</p>

	<p>121 inward facing CCTV security cameras at a maximum height of 4m constructed on concrete foundations are anticipated to be installed on the security and deer fencing. There will be no artificial lighting around the site as CCTV is inward facing infra-red. However, floodlights are to be used for infrequent maintenance and operational activities only. Lighting will be manually controlled rather than PIR, in order to prevent unnecessary activation.</p> <p>Details of this are shown in Figure 15: Typical Security Fence Detail (Drawing Number: 05004-RES-SEC-DR-PT-001)</p> <p>Details of the deer fencing are shown in Figure 16: Typical Deer Fence (Drawing Number: 05004-RES-SEC-DR-PT-002) and the CCTV detail can be seen at Figure 17: Typical Security CCTV Detail (Drawing Number: 05004-RES-SEC-DR-PT-003).</p>
Maintenance Tracks & Site Access Gate	<p>Maintenance tracks will be constructed within the fenced boundary of the Application Site to provide access to the infrastructure by construction vehicles. The tracks will be designed to have sufficient radii for turning of the construction vehicles.</p> <p>Site access will be taken from the southern boundary at Saverley Green Road. A double leaf vehicle gate for access alongside a pedestrian gate, where required, will be installed in order for construction and maintenance vehicles to enter and exit the site appropriately. The gate will also adhere to safety and security measures required on site. Details of the proposed site access are shown in Figures 21-24: Site Access Drawings.</p> <p>In order to create the access tracks throughout the site, some short sections of hedge or scrub would be removed from field boundaries to facilitate access or construction of fencing. The access tracks would be approximately 4m wide with 0.25m shoulders at either side. Details of this are shown in Figure 6: Typical Access Track Detail (Drawing Number: 05004-RES-ERW-DR-PT-001).</p>

3.3 Construction Phase

The construction phase of the Proposed Development is anticipated to take place over a period of approximately 12 months. The construction activities that will be required include:

- Erection of deer fencing;
- Construction of access tracks, temporary construction compounds and hardstanding;
- Delivery of components and materials;
- Installation of racks and panels;
- Cable works;
- Removal of temporary construction compounds;
- Reinstatement works and demobilisation from site; and
- Landscape planting and habitat enhancement measures.

Two construction compounds will be located within the Application Site in order to facilitate the construction of the Proposed Development. The compound would allow for the laydown of materials and vehicle parking throughout the duration of the construction phase.

3.4 Operational Phase

Consent is being sought for a period of 40 years. During the operational phase, the Proposed Development will be largely autonomous and will not require resident staff. There will be around 10-15 LGV trips to site per year for maintenance. Therefore, activity on site during the operational phase would be limited to vegetation and habitat management, equipment maintenance, servicing of components and any emergency servicing requirements.

Any non-routine maintenance and repair operations would be undertaken as and when they arise. Therefore, activity on site associated with the Proposed Development would be limited to equipment maintenance and the servicing of components, such as periodic panel cleaning throughout the year and any emergency servicing.

During operation, small livestock can graze the site beneath and between arrays, thereby retaining agricultural activity while the solar farm introduces new economic activity to the area.

3.5 Decommissioning Phase

Following the cessation of electricity generation at the end of the operational phase, the Proposed Development would be decommissioned, and the components removed from the Application Site. The new site access would remain post-decommissioning for utilisation by landowner. The land would then be reinstated as close as practicable to its original condition. The following activities may be associated with the decommissioning of the Proposed Development:

- The components of the solar farm would be dismantled and removed from the site utilising the proposed access;
- As much material will be recycled or re-used on-site where possible, and
- The land will be restored by infilling holes, backfilling cable trenches and landscaping/re-seeding.

Once the BESSs comes to the end of their life, the reuse of batteries and recycling of the materials they contain can take place.

Should the opportunity arise for re-powering of the Proposed Development, then a new consenting process would be required.

Section 4.0: The Development Plan

4.1 Introduction

Sections 25 and 37(2) of the Town and Country Planning Act 1990⁴ gave statutory force to a plan led system of development control. Section 38(6) of the Planning and Compulsory Purchase Act 2004⁵ requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.

This section of the Planning Statement identifies the Development Plan and policies that are relevant to the Proposed Development.

4.2 Development Plan

The Adopted Local Plan for Stafford Borough consists of the following:

- The Plan for Stafford Borough 2011-2031 (PSB1)⁶;
- The Plan for Stafford Borough: Part 2 2011-2031 (PSB2)⁷; and
- The Policies Map⁸.

The Plan for Stafford Borough 2011-2031 (PSB1) was adopted in June 2014. PSB1 sets out the strategic policies associated with the Borough, including identification of the sustainable settlement hierarchy. Following the publication of PSB1, The Plan for Stafford Borough: Part 2 2011-2031 (PSB2) was adopted in January 2017. This document sets out an approach to development in the sustainable settlement hierarchy.

As the PSB1 was adopted in 2014, national planning policy has changed considerably and indeed the approach to the development of solar PV projects in the Green Belt. In addition to this, the approach to solar PV projects on agricultural land has changed significantly by way of not only national planning policy and guidance but also in relation to various appeal decisions.

Stafford Borough Council are in the process of updating the Plan for Stafford Borough. Once formally adopted, the Stafford Borough Local Plan 2020-2040 will replace PSB1 and PSB2. The weight attached to the emerging Local Plan as a material consideration is still currently limited although this will increase once the Proposed Plan is published.

The adopted Local Plan policies considered to be relevant to the Proposed Development have been identified in Table 4.1 below. No additional policies included in PSB2 are considered to be directly relevant to the Proposed Development.

Table 4.1: Local Plan Policies

Policy	Title
The Plan for Stafford Borough 2011-2031	
Spatial Principle SP1	Presumption in Favour of Sustainable Development
Spatial Principle SP3	Stafford Borough Sustainable Settlement Hierarchy
Spatial Principle SP6	Achieving Rural Sustainability
Spatial Principle SP7	Supporting the Location of New Development
Policy T1	Transport

⁴ UK Government (1990) The Town and Country Planning Act 1990. Available online: [Town and Country Planning Act 1990 \(legislation.gov.uk\)](#)

⁵ UK Government (2004) The Planning and Compulsory Purchase Act 2004. Available online: [Planning and Compulsory Purchase Act 2004 \(legislation.gov.uk\)](#)

⁶ The Plan for Stafford Borough 2011-2031 (2014). Available online: [The Plan for Stafford Borough - Adoption \(staffordbc.gov.uk\)](#)

⁷ The Plan for Stafford Borough: Part 2 2011-2031 (2017). Available online: [The Plan for Stafford Borough: Part 2 \(staffordbc.gov.uk\)](#)

⁸ Stafford Borough Council Policies Map. Available online: [The Plan for Stafford Borough 2011 - 2031 \(arcgis.com\)](#)

Policy N1	Design
Policy N2	Climate Change
Policy N3	Low Carbon Sources & Renewable Energy
Policy N4	The Natural Environment & Green Infrastructure
Policy N5	Sites of European, National & Local Nature Conservation Importance
Policy N8	Landscape Character
Policy N9	Historic Environment

4.3 The Minerals Local Plan for Staffordshire 2015 to 2030

In addition to the Adopted Local Plan, Staffordshire County Council have published a Minerals Local Plan for Staffordshire 2015 to 2030⁹ (MLPS). This plan identifies suitable land and planning policies that will be used to determine planning applications to develop Staffordshire's mineral resources during the period 2015 to 2030. Policy 3 in the plan has been identified as being relevant to the Proposed Development due to the Application Site's location.

4.4 Supplementary Planning Documents and Guidance Notes

As part of PSB1 and PSB2, Supplementary Planning Documents (SPDs) have been published in order to provide further information. The relevant SPD for the Proposed Development is as follows:

- Design Supplementary Planning Document (2018)¹⁰.

⁹ Staffordshire County Council: The Minerals Local Plan for Staffordshire 2015 to 2030. Available online: [Consultation on Emerging Staffordshire Minerals Local Plan](#)

¹⁰ Stafford Borough Council: Design Supplementary Planning Document (2018). Available Online: [Adopted SPD on Design April 2018.pdf \(staffordbc.gov.uk\)](#)

Section 5.0: National Planning Policy and Other Material Considerations

5.1 National Planning Policy

5.1.1 Introduction

This section discusses national planning policy that is relevant to the Proposed Development.

As discussed previously, the PSB1 was adopted in 2014. National planning policy has changed considerably since that time, as has the approach to development of solar PV projects in the Green Belt. In addition to this, the approach to solar PV projects on agricultural land has changed significantly by way of not only national planning policy and guidance but also in relation to various appeal decisions. Therefore, the importance of up-to-date national planning policy with regard to the Proposed Development is paramount when assessing this application.

5.1.2 National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF)¹¹ was published in March 2012 and subsequently updated most recently in December 2023. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The Proposed Development has been assessed against all relevant NPPF sections.

5.1.2.1 Sustainable Development

Sustainable development is at the heart of the NPPF, as the purpose of the planning system is to contribute towards the achievement of sustainable development. A presumption in favour of sustainable development is introduced within Section 2 'Achieving Sustainable Development'. Paragraph 11, Part C outlines that this means *"approving development proposals that accord with an up-to-date development plan without delay..."*

In order to achieve sustainable development, the planning system has three overarching objectives; economic, social and environmental. Of key importance to the Proposed Development is the protection and enhancement of the natural, built and historic environment, making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.1.2.2 Climate Change & Renewable Energy Developments

Paragraph 152 in Section 14 'Meeting the Challenge of Climate Change, Flooding and Coastal Change' of the NPPF states that *"the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."*

Paragraph 154 highlights that new developments should be planned for in ways that *"can help to reduce greenhouse gas emissions, such as through its location, orientation and design."*

Paragraph 156 is of particular relevance, stating *"local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning."*

Paragraph 157 states that *"in determining planning applications, local planning authorities should expect new development to:"*

¹¹ Ministry of Housing, Communities and Local Government (2023): National Planning Policy Framework. Available Online: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/national-planning-policy-framework-2023)

- a) *comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- b) *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption”*

When determining planning applications for renewable and low carbon energy developments, Paragraph 158 states that Local Planning Authorities (LPAs) should:

“a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”

Furthermore, Paragraph 174 discusses that *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) *remediating and mitigating despoiled.”*

5.1.2.3 Green Belt

The Proposed Development is located in the North Staffordshire Green Belt. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open. Section 13 of the National Planning Policy Framework (NPPF)¹² (2023) sets out the national policy approach to protecting the Green Belt. As stated in Paragraph 137 of the NPPF, the Government attaches great importance to Green Belts, and has adopted a fundamental aim of preventing urban sprawl by keeping Green Belt designated land open to maintain its essential characteristics of openness and permanence.

Paragraph 138 of the NPPF states that the Green Belt serves five purposes, including:

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

¹² Ministry of Housing, Communities and Local Government (2023): National Planning Policy Framework. Available Online: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115114/nppf-2023.pdf)

As noted in Paragraph 147, *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*

Paragraph 151 states that *“when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases, developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”*

A separate Green Belt Assessment has been submitted alongside the planning application which details the very special circumstances of which the Proposed Development outweighs the potential harm to the Green Belt.

5.1.3 National Planning Practice Guidance

5.1.3.1 Renewable & Low Carbon Energy

The NPPF is supported by a number of National Planning Practice Guidance (NPPG) documents. Of relevance to the Proposed Development is the ‘Renewable and Low Carbon Energy’ NPPG¹³, which was published in 2015 and has since had various updates in the relevant sections. This NPPG provides guidance to aid LPAs in developing policies and identifies planning considerations for renewable and low carbon energy, and specifically large-scale, ground-mounted solar farm developments, including:

- *“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 (i) 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; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.*
- *that solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use;*
- *the proposal’s visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety;*
- *the need for, and impact of, security measures such as lights and fencing;*
- *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;*
- *the potential to mitigate landscape and visual impacts through, screening with native hedges, and*
- *the energy generating potential, which can vary for a number of reasons including, latitude and aspect.”*

5.1.3.2 Other Relevant NPPGs

Other relevant NPPGs have been addressed within the supporting environmental and technical assessments where relevant, including:

- Flood and Coastal Change (2014)¹⁴;
- Green Belt (2019)¹⁵;
- Historic Environment (2019)¹⁶.
- Natural Environment (2019)¹⁷; and
- Noise (2019)¹⁸.

¹³ Ministry of Housing, Communities and Local Government (2015) Guidance: Renewable and Low Carbon Energy. Available Online: [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/renewable-and-low-carbon-energy)

¹⁴ Ministry of Housing, Communities and Local Government (2014) Guidance: Flood and Coastal Change. Available Online: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-and-coastal-change)

¹⁵ Ministry of Housing, Communities and Local Government (2019) Guidance: Green Belt. Available online: [Green Belt - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/green-belt)

¹⁶ Ministry of Housing, Communities and Local Government (2019) Guidance: Historic Environment. Available Online: [Historic environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/historic-environment)

¹⁷ Ministry of Housing, Communities and Local Government (2019) Guidance: Natural Environment. Available Online: [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/natural-environment)

¹⁸ Ministry of Housing, Communities and Local Government (2019) Guidance: Noise. Available Online: [Noise - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise)

5.2 National Climate & Energy Policy

5.2.1 Overarching National Policy Statement for Energy (EN-1) (2023)

The current Overarching National Policy Statement for Energy (EN-1) (NPS)¹⁹ was published by the Department of Energy Security and Net Zero (DESNZ) (which replaced the former Department of Energy and Climate Change (DECC)) in November 2023, replacing the previous NPS EN-1 published in 2011. The NPS sets out the national policy for energy infrastructure. Although the primary purpose of the NPS is for the determination of Nationally Significant Infrastructure Projects (NSIP), it is set out within the NPS that it is still relevant as a material consideration for the determination of applications that fall under the Town and Country Planning Act 1990 (as amended).

The NPS emphasises the need to increase energy generation from renewable sources. Section 3.3.20 of the NPS states that *“wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominately of wind and solar.”*

In relation to BESS and solar developments, Section 3.3.22 the NPS EN-1 states that *“it is recognised that ensuring affordable system reliability, today and in the future, means wind and solar need to be complemented with technologies which supply electricity, or reduce demand, when the wind is not blowing, or the sun does not shine.”* Alongside this, Section 3.3.27 of the NPS highlights that *“storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the National Electricity Transmission System Operator (NETSO) and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.”*

5.2.2 National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)

The NPS for Renewable Energy infrastructure (EN-3)²⁰ was also adopted in November 2023, replacing the previous NPS EN-3 published in 2011. Similarly, with NPS EN-1, NPS EN-3 is primarily focussed on NSIP developments. However, it is still relevant as a material consideration for the determination of applications that fall under the Town and Country Planning Act 1990 (as amended).

In relation to solar farm developments, Section 3.10.1 of the EN-3 states that *“the Government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector.”*

The EN-3 also details within Section 3.10.4 that *“solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.”*

5.3 Other Material Considerations

The following sections detail other material considerations that are considered to be relevant to the Proposed Development as a renewable energy proposal.

5.3.1 The United Nations Framework Convention on Climate Change

International energy policy is based on the demand to battle climate change and reduce carbon dioxide (CO₂) emissions and, therefore, is relevant to renewable energy development. The United Nations Framework Convention on Climate Change (UNFCCC) implemented by the United Nations in May 1992, determined a long-term objective to stabilise greenhouse gas concentrations in the atmosphere, with the

¹⁹ DECC (2023) Overarching National Policy Statement for Energy (EN-1). Available Online: [EN-1 Overarching National Policy Statement for Energy \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/EN-1_Overarching_National_Policy_Statement_for_Energy.pdf)

²⁰ Department for Energy Security and Net Zero (2023). National Policy Statement for Renewable Energy Infrastructure (EN-3). Available online: [NPS EN-3 - Renewable energy infrastructure \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/NPS_EN-3_-_Renewable_energy_infrastructure.pdf)

purpose of preventing anthropogenic interference with the climatic system. Subsequently, the Kyoto Protocol²¹ was implemented in 1997. National governments who signed up to the Kyoto Protocol are committed to reducing their greenhouse gas emissions.

5.3.2 The Paris Agreement

The Paris Agreement's central objective is to boost global response to climate change, keep global temperature rise low and strengthen efforts to support this. The European Union signed the UK and Northern Ireland up to the Agreement on 22nd April 2016 and it came into force on the 18th December 2016. In line with Article 4 of the Paris Agreement, a Nationally Determined Contribution (NDC)²² was drawn up which commits the UK to reduce economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels.

European and national energy policy has been established from the Kyoto Protocol and Paris Agreement requirements and will continue to be framed by emerging guidance and scientific information.

5.3.3 The Clean Growth Strategy

The Clean Growth Strategy Policy Paper²³ sets out the “*ambitious blueprint*” for the UK's low carbon future. The Strategy sets out ambitions for the delivery of clean, smart and flexible power, including the need for a diverse electricity system that supplies homes and businesses with secure, affordable and cheap energy. The Strategy identifies that this requires the development of low carbon sources of electricity.

5.3.4 The Climate Change Act (2008) (2050 Target Amendment) Order 2019

The Climate Change Act (2008) is the basis for the UK's approach to tackling and responding to climate change. This act legally committed the UK to reducing greenhouse gas emissions by at least 80% in 2050, when compared to the 1990 levels.

In May 2019, the Committee on Climate Change published their ‘Net Zero Technical Report’²⁴, setting out a new emissions target for the UK of net zero greenhouse gases by 2050. In response to this, the Climate Change Act 2008 (2050 Target Amendment) Order 2019 came into force on 27 June 2019 and amended the previous legally binding target to reduce greenhouse gas emissions from 80% to 100%.

In order to track progress, the 2008 Act introduced a system of carbon budgets setting five-year caps on greenhouse gas emissions. The carbon budgets restrict the amount of greenhouse gas the UK can legally emit in a five-year period. The UK is currently in the third carbon budget period, which runs from 2018 – 2022. The Climate Change Committee states:

“UK emissions were 44% below 1990 levels in 2018. The first carbon budget (2008 to 2012) was met, as was the second (2013 to 2017) and the UK is on track to outperform the third (2018 to 2022). However, it is not on track to meet the fourth (2023 to 2027). To meet future carbon budgets and the 100% target for 2050 it will require the government to apply more challenging measures.”

The Act also requires the UK Government:

- To assess regularly the risks to the UK of the current and predicted impact of climate change;
- To set out its climate change adaptation objectives; and
- To set out its proposals and policies for meeting these objectives.

Reports have shown that in order to achieve net zero by 2050 the UK will need to quadruple its low carbon electricity generation. Solar energy has an important part to play in helping reach these targets, as well as providing a balanced energy mix, and it is estimated that 40GW²⁵ of solar will be needed by 2030 to stay

²¹ United Nations: Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997) Available online: [kpeng.pdf \(unfccc.int\)](https://unfccc.int/kpeng.pdf)

²² United Kingdom of Great Britain and Northern Ireland's Nationally Determined Contribution (2022). Available online: [United Kingdom of Great Britain and Northern Ireland's Nationally Determined Contribution \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101444/uk-ndc-2022.pdf)

²³ HM Government (2017): The Clean Growth Strategy. Available Online: [Clean Growth Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/624447/clean-growth-strategy.pdf)

²⁴ Climate Change Committee (2019) Net Zero Technical Report. Available online: [Net Zero - Technical Report - Climate Change Committee \(theccc.org.uk\)](https://www.theccc.org.uk/publication/net-zero-technical-report/)

²⁵ The Committee on Climate Change (2019): Accelerated Electrification and the GB Electricity System. Available online: [Accelerated electrification and the GB electricity system \(theccc.org.uk\)](https://www.theccc.org.uk/publication/accelerated-electrification-and-the-gb-electricity-system/)

on track with net zero ambitions, with 63% (or 25GW²⁶) of this coming from large scale ground mounted solar farms.

5.3.5 Climate Change Committee: The Sixth Carbon Budget: The UK's Path to Net Zero

The Climate Change Committee advised the UK Government to set its Sixth Carbon Budget to require a reduction in emissions of 78% by 2035, relative to 1990 levels, a 63% reduction from 2019²⁷. The accompanying document 'The Sixth Carbon Budget: Electricity Generation'²⁸ contains a summary of content for the electricity generation sector. The Report identifies the *"need to continue to reduce emissions from electricity generation, while meeting new demands from the electrification of heat and transport"*. In order to meet this need, the UK will require a portfolio of renewable energy generation technologies, including variable renewables, such as solar PV.

The Report states that *"variable renewables (i.e. wind and solar) have a key role to play in the decarbonisation of electricity generation, as they can provide zero-carbon electricity generation at low cost"*.

The Report also highlights that the UK has the potential to deploy capacity to generate 145 – 615 GW of solar capacity.

5.3.6 Climate Change Committee: Progress on Reducing Emissions, 2023 Report to Parliament

The 2023 Report to Parliament²⁹ identified that greenhouse gas emissions rose by 0.8% in 2022. It was reported that emissions from aviation and surface transport rose, however there was a decrease in emissions from homes. In terms of electricity, the UK became a net exporter of electricity in 2022, rather than an importer. This increased gas-fired electricity generation, although increased renewable generation meant that the power sector emissions were stable.

The report states: *"Renewable electricity capacity increased in 2022, but not at the rate required to meet the Government's stretching targets, particularly for solar deployment. Given short lead-times, rapid deployment of onshore wind and solar could have helped to mitigate dependence on imported gas during the fossil fuel crisis."*

Urgent action is required in relation to electricity decarbonisation, the report states:

"The Government has committed to decarbonising electricity supply by 2035, subject to ensuring security of supply, together with ambitious targets for building new renewables and nuclear. However, the Government has not yet published an overarching standalone plan or strategy for delivering a decarbonised and reliable electricity system by 2035 that is resilient not only to average weather, but to plausible future extreme weather and demand scenarios. Doing so would facilitate a more coordinated and strategic approach to delivery and improve visibility and confidence for investors. In parallel with this, there is an immediate need for policy to move ahead with ensuring adequate network capacity and connections, bringing forward low-carbon flexibility solutions, and reforming electricity market design."

It is clear in the report that renewable energy generation capacity increased in 2022, but this was below the rate required to meet Government targets. With regards to solar deployment, 0.7GW of solar was deployed in 2022, which is significantly off track from the annual average deployment rate of 4.3GW required to achieve 70GW of solar by 2035.

²⁶ Solar Energy UK: Lighting the Way: Making Net Zero a Reality with Solar Energy. Available online: [Lighting the way: Making net zero a reality with solar energy • Solar Energy UK](#)

²⁷ Climate Change Committee (2020) Sixth Carbon Budget. Available Online: [Sixth Carbon Budget - Climate Change Committee \(theccc.org.uk\)](#)

²⁸ Climate Change Committee (2020) The Sixth Carbon Budget: Electricity Generation. Available Online: [Sector-summary-Electricity-generation.pdf \(theccc.org.uk\)](#)

²⁹ The Committee on Climate Change (2023) 2023 Progress Report to Parliament. Available online: [2023 Progress Report to Parliament - Climate Change Committee \(theccc.org.uk\)](#)

5.3.7 Energy White Paper: Powering our Net Zero Future (2020)

The Energy White Paper: Powering our Net Zero Future³⁰ was published in December 2020. The White Paper states that the UK energy system is still largely dominated by the use of fossil fuels, which will need to change dramatically by 2050 if the net zero target is to be achieved. Decarbonising the energy system over the next thirty years means replacing – as far as it is possible to do so – fossil fuels with clean energy technologies such as renewables. The UK Government is not planning for any specific technology solution; however, the future generation mix will comprise a low-cost, net zero consistent system, likely to be composed predominately of wind and solar, alongside complementary technologies such as battery storage. The White Paper states *“we will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios.”*

5.3.8 The Ten Point Plan for a Green Industrial Revolution

In November 2020, the Prime Minister announced his Ten Point Plan³¹ for the UK to lead the world into a new Green Industrial Revolution. This innovative programme sets out ambitious policies and significant new public investment to support green job creation, accelerate our path to reaching net zero by 2050 and lay the foundations for building back greener. Spanning clean energy, buildings, transport, nature and innovative technologies, the Ten Point Plan will mobilise £12 billion of government investment to unlock 3 times as much private sector investment by 2030; level up regions across the UK; and support up to 250,000 highly skilled green jobs.

5.3.9 National Infrastructure Strategy (2020)

The National Infrastructure Strategy (NIS)³² was published in November 2020, setting out the Government's plans to deliver a radical improvement in the quality of the UK's infrastructure. Chapter 3: Power of the NIS emphasises the importance of renewable energy deployment as part of the plan, whilst balancing between reducing power sector emissions, maintaining energy security and providing affordable electricity for households and businesses.

To achieve net zero by 2050, the NIS states *“the power system will need to be virtually carbon free and significantly larger to cope with the additional demand from electrification in transport, heating and some industrial processes...”*. It is acknowledged that the greatest proportion of this generation will be provided by low-cost renewable technologies. Therefore, the share of generation from renewable energy needs to “dramatically increase” with capacity provided by a range of technologies, including solar, onshore wind and offshore wind.

5.3.10 Net Zero Strategy: Build Back Greener (2021)

The Net Zero Strategy³³ was published in October 2021, setting out the policies and proposal for decarbonising all sectors of the UK economy in order to meet the net zero target by 2050. The Net Zero Strategy identifies key policies in relation to the energy sector, those considered relevant to the Proposed Development include:

- *“By 2035, the UK will be powered entirely by clean electricity, subject to security of supply.*
- *40GW of offshore wind by 2030, with more onshore, solar, and other renewables.*
- *Deployment of new flexibility measures including storage to help smooth out future price spikes.”*

Paragraph 47 of the Net Zero Strategy highlights the importance of community energy, outlining that communities can come together to reach local and national net zero targets. Community Energy England estimates that the community energy sector could *“contribute up to 5,270 MW, power 2.2 million homes, support 8,700 jobs and add £1.8 billion to the economy each year”*.

³⁰ UK Government (2020). Powering our Net Zero Future. Available Online: [Energy White Paper \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94411/energy-white-paper.pdf)

³¹ HM Government (2020): The Ten Point Plan for a Green Industrial Revolution. Available online: [The Ten Point Plan for a Green Industrial Revolution \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94411/ten-point-plan.pdf)

³² HM Treasury (2020) National Infrastructure Strategy. Available Online: [CP 329 – National Infrastructure Strategy – Fairer, faster, greener – November 2020 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94411/cp-329-national-infrastructure-strategy-fairer-faster-greener-november-2020.pdf)

³³ HM Government (2021) Net Zero Strategy: Build Back Greener. Available Online: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

5.3.11 BEIS Outcome Delivery Plan: 2021-2022

The Department for Business, Energy and Industrial Strategy (BEIS) sets out their priority outcomes for the period to 2022 in the Delivery Plan³⁴. Of relevance to the Proposed Development is Priority Outcome 2: Tackle Climate Change. The aim of this Outcome is to reduce the UK greenhouse gas emissions to Net Zero by 2050.

Outcome 2 provides background on the carbon emissions reduction journey, stating *“since 1990, the UK has reduced emissions by 44% whilst increasing GDP by 78%, the fastest decarbonisation rate in the G7. In June 2019, the UK became the first major economy to set a legally binding target to reach net zero greenhouse gas emissions by 2050, in recognition of the transformative change needed to tackle global climate change.”*

In order to achieve net zero by 2050, the Plan identifies a number of steps, including the targeting of the deployment of low carbon renewable energy technologies.

5.3.12 British Energy Security Strategy (2022)

The British Energy Security Strategy (BESS)³⁵ was published in April 2022 to address energy security across the UK, highlighting our vulnerability to international oil and gas prices and identifying the need to reduce dependence on imported oil and gas. As set out within the BESS, increasing the proportion of electricity generated from renewable sources reduces the exposure of the UK to volatile fuel markets. The BESS identifies the need to be bolder in the *“removing of red tape that holds back new clean energy developments and exploit the potential of all renewable technologies.”*

In relation to solar, the BESS identifies that there is currently circa 14GW of solar capacity in the UK, split across various scales of development, ranging from large scale to smaller scale roof-mounted solar. It is expected that solar development will increase five-fold by 2035, which would result in the need for an additional 70GW of solar generation to be built across the UK to help us get to Net Zero.

In order to increase the deployment of solar across the UK, the BESS seeks to consult on *“amending planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place. We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.”*

5.3.13 Powering Up Britain

The Powering Up Britain report³⁶ (April 2023) emphasises energy security as one of the Government's greatest priorities and sets out how the Government aim to enhance our country's energy security, seize the economic opportunities of this transition and deliver on the UK's net zero commitments. Regarding solar, the report states that:

“Solar has huge potential to help us decarbonise the power sector. We have ambitions for a fivefold increase in solar by 2035, up to 70GW, enough to power around 20 million homes. We need to maximise deployment of both ground and rooftop solar to achieve our overall target. Ground-mount solar is one of the cheapest forms of electricity generation and is readily deployable at scale. Government seeks large-scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low/medium grade agricultural land.”

5.3.14 COP 28

COP 28 took place in Dubai, United Arab Emirates from the 30th November until the 13th December 2023. A summary of Global Climate Action from COP 28³⁷ was published by the UNFCCC following this.

³⁴ BEIS (2021) Outcome Delivery Plan 2021-2022. Available Online: [BEIS Outcome Delivery Plan: 2021 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97443/BEIS_Outcome_Delivery_Plan_2021_to_2022_-_GOV.UK.pdf)

³⁵ HM Government (2022) British Energy Security Strategy. Available Online: [British Energy Security Strategy \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/104443/BESS.pdf)

³⁶ HM Government: Powering Up Britain. Available online: [Powering Up Britain - Joint Overview \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/104443/Powering_Up_Britain_-_Joint_Overview.pdf)

³⁷ UNFCCC (2023) Summary of Global Climate Action at COP 28. Available online: [Summary_GCA_COP28.pdf \(unfccc.int\)](https://unfccc.int/publications/summary-of-global-climate-action-at-cop-28)

The summary discussions the launch of the Global Renewables and Energy Efficiency Pledge by the COP 28 presidency which *“stipulates that signatories commit to work together to triple the world’s installed renewable energy generation capacity to at least 11,000 GW by 2030 and to collectively double the global average annual rate of energy efficiency improvements from around two per cent to over four per cent every year until 2030.”*

5.4 Local Climate & Energy Policy

The Committee on Climate Change (CCC) states that LPAs have a crucial role in contributing to the reduction in emissions and helping the UK to meet its carbon reduction targets. LPAs are well placed to influence reductions in emissions across their wider areas through the services they deliver, their role as trusted community leaders and major employers, as well as their regulatory and strategic functions.

5.4.1 Stafford Borough Council

Stafford Borough Council (SBC) declared a climate emergency in July 2019 and have stated that the Council’s vision is *“to create a green, healthy and resilient Stafford Borough where everyone can thrive, by limiting the impacts of climate change and meeting our climate change and green recovery commitments”*³⁸. SBC have published a Climate Change and Green Recovery Strategy 2020-2040³⁹ (2021) which details the importance of the installation of renewable energy infrastructure when considering ways to limit the effects of climate change. The document also highlights that the new Local Plan that is currently being prepared will continue to encourage renewable energy production throughout the Stafford Borough.

5.4.2 Staffordshire County Council

Staffordshire County Council (SCC) also declared a climate emergency in July 2019 to achieve net zero emissions by 2050 across all aspects of the Council’s service provision and estate.

SCC published a Climate Change Action Plan 2021-2025⁴⁰ (revised in November 2022) which details actions that are needed to either stop carbon emissions, develop a way to remove carbon already in the atmosphere or help businesses and communities prepare for the impact of climate change. Alongside this document, SCC have also published a Climate Change Strategic Development Framework⁴¹ (February 2021) which sets out five delivery themes in order to deliver the Council’s vision of achieving net zero carbon emissions by 2050: Waste, Organisational Carbon Reduction, Air Quality, Natural Environment and Behaviour Change. The increased utilisation of renewable energy is noted as one of the priorities in Organisational Carbon Reduction in order to aid in reducing the carbon footprint of SCC’s services.

³⁸ Stafford Borough Council: Climate Change and Green Recovery. Available online: [Climate Change and Green Recovery | Stafford Borough Council \(staffordbc.gov.uk\)](https://www.staffordbc.gov.uk/Climate-Change-and-Green-Recovery)

³⁹ Stafford Borough Council: Climate Change and Green Recovery Strategy 2020-2040. Available online: [Climate Change Strategy \(staffordbc.gov.uk\)](https://www.staffordbc.gov.uk/Climate-Change-Strategy)

⁴⁰ Staffordshire County Council: Climate Change Action Plan 2021-2025 (revised 2022). Available online: [CCAP 3 \(staffordshire.gov.uk\)](https://www.staffordshire.gov.uk/CCAP-3)

⁴¹ Staffordshire County Council: Climate Change Strategic Development Framework (2021). Available online: [COP2263 Climate Change Strategic Development Framework \(staffordshire.gov.uk\)](https://www.staffordshire.gov.uk/COP2263-Climate-Change-Strategic-Development-Framework)

Section 6.0: Planning Policy Assessment

6.1 Introduction

While the Development Plan always has to be read as a whole, it follows that the greatest weight should be attributed to both site-specific policies relating to the Application Site and bespoke policies that are designed to address a specific development type or policy area. In this case, the predominant policy is Policy N3: Low Carbon Sources & Renewable Energy.

Furthermore, consistency with the up-to-date national planning policy position on renewable energy is maintained throughout the assessment given that PSB1 was adopted in 2014.

Having regard to the Development Plan as a whole, it is possible to identify a number of policies that the planning application should be assessed against. The following section of this Planning Statement considers each of these policies in turn, assessing the Proposed Development against the terms of the Development Plan. Table 6.1 sets out these policy topics and cross refers the relevant Local Plan policies and applicable material considerations.

Table 6.1: Planning Policy Topics and Policies

Topic	Local Plan	Supplementary Guidance/National Planning Policy Considerations
Energy	<ul style="list-style-type: none"> Policy N3: Low Carbon Sources and Renewable Energy 	<ul style="list-style-type: none"> NPPF Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change NPPG: Renewable and Low Carbon Energy
Green Belt		<ul style="list-style-type: none"> NPPF Section 13: Protecting Green Belt land
Landscape	<ul style="list-style-type: none"> Policy N8: Landscape Character 	
Sustainability	<ul style="list-style-type: none"> Spatial Principle SP1: Presumption in Favour of Sustainable Development Spatial Principle SP6: Achieving Rural Sustainability 	<ul style="list-style-type: none"> NPPF Section 2: Achieving Sustainable Development
Location of Proposed Development	<ul style="list-style-type: none"> Spatial Principle SP3: Stafford Borough Sustainable Settlement Hierarchy Spatial Principle SP7: Supporting the Location of New Development 	<ul style="list-style-type: none"> MLPS Policy 3: Safeguarding Minerals of Local and National Importance and Important Infrastructure
Design	<ul style="list-style-type: none"> Policy N1: Design 	<ul style="list-style-type: none"> Design Supplementary Planning Document
Flood Risk and Water Management	<ul style="list-style-type: none"> Policy N2: Climate Change 	<ul style="list-style-type: none"> NPPF Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change
Biodiversity	<ul style="list-style-type: none"> Policy N4: The Natural Environment and Green Infrastructure Policy N5: Sites of European, National and Local Nature Conservation Importance 	<ul style="list-style-type: none"> NPPF Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change NPPF Section 15: Conserving and Enhancing the Natural Environment NPPG: Natural Environment Environment Act 2021

Historic Environment	<ul style="list-style-type: none"> Policy N9: Historic Environment 	<ul style="list-style-type: none"> NPPF Section 16: Conserving and Enhancing the Historic Environment NPPG: Historic Environment
Transport	<ul style="list-style-type: none"> Policy T1: Transport 	

6.2 Energy

Policy N3 states that proposals for renewable energy schemes will be supported provided that the following assessment criteria is adhered. This assessment criteria is detailed in Table 6.2 below.

Table 6.2: Policy N3 Assessment Criteria

Criteria	Assessment of the Proposed Development
a. The technology is suitable for the proposed location, does not cause harm to residential amenity, the significance of heritage assets and their setting and has limited adverse effects on the surrounding landscape and townscape character;	<p>As concluded from the Landscape and Visual Impact Assessment (LVIA), at no residential property would visual effects from the Proposed Development cause an overbearing impact, visual dominance or a loss of outlook. The LVIA also concluded that, with the implementation of landscape planting detailed in Figure 19 and Figure 20, the effect on the surrounding landscape character would greatly reduce.</p> <p>In addition to this, the Cultural Heritage Impact Assessment determined that the Proposed Development will not have a significant impact on any designated or non-designated heritage assets and their settings located within or adjacent to the Application Site. Additionally, the historic landscape character of the site will be retained within the layout of the Proposed Development.</p>
b. Levels of noise, overshadow, flicker (associated with some wind turbines), or other harmful emissions are minimised and there is no adverse effect on public safety;	<p>The Proposed Development will not result in any significant impact to overshadow and will not emit shadow flicker. No other harmful emissions or detrimental effect on public safety will derive from the Proposed Development.</p> <p>Although the solar panels themselves do not generate noise, the associated infrastructure with the Proposed Development can generate limited noise throughout the operational phase. These components of the Proposed Development have been sited away from potentially sensitive receptors. A Noise Assessment was submitted alongside the planning application. This report concluded that noise levels resulting from the operation of the site will generally be low and no specific noise mitigation is required.</p> <p>Additionally, a Glint & Glare Assessment was undertaken which determined that provided that on-site hedgerow is retained to a height of 3.5m, the Proposed Development poses a low impact to public safety.</p>
c. The technology does not affect the integrity of the water environment, or locally, nationally and internationally designated sites;	<p>There are no significant changes in land cover planned by the scheme design and the nature of the Proposed Development consists of solar panel modules which are raised off the ground, therefore not reducing any existing permeable areas significantly and only increasing runoff by a small amount. Therefore, the integrity of the water</p>

	<p>environment will not be affected. Details of this can be found within the Flood Risk Assessment as part of this planning application.</p> <p>The Proposed Development is located in the North Staffordshire Green Belt designation. A Green Belt Assessment was undertaken and is submitted alongside the planning application which details the need for the Proposed Development and the way in which the development presents very special circumstances and will not have an impact on the integrity of the designated Green Belt site.</p> <p>The Proposed Development is a sufficient distance from any other locally, nationally and internationally designated sites and therefore significant effects on designated sites are not predicted during either the construction or operation of the Proposed Development.</p>
<p>d. Every proposal is accompanied by decommissioning conditions and the ability to ensure restoration of the site following cessation of energy production.</p>	<p>As detailed in Section 3.6, the operational phase of the Proposed Development is expected to take place over a period of 40 years, following which, the Proposed Development would be decommissioned, and all components removed from the site.</p> <p>The land at the application site would then be reinstated as close as practicable to its original condition with the benefit of the retained and enhance landscape and biodiversity value from the matured mitigation planting detailed within the LEMP.</p>

Alongside the above criteria, Policy N3 details additional matters regarding the cumulative impact of additional developments and the benefits renewable energy schemes should aim to deliver:

“In areas where other renewable energy schemes are in operation, the cumulative effect of additional developments will be an important factor that will be taken into consideration. Large scale renewable energy proposals should deliver economic, social and environmental benefits that are directly related to the Proposed Development.”

A search was undertaken in August 2023 of any existing and/or approved solar array developments within a 5km buffer of the Application Site in order to address the potential cumulative effect of the Proposed Development. Details of the search are set out in Section 2.5 of this Planning Statement. The closest approved solar array development is approximately 1.8km north of the Application Site at its closest. Therefore, the potential cumulative effect of this Proposed Development is not considered to be significant.

Furthermore, the Proposed Development is for a renewable energy development that at its core will benefit the environment and help reduce emissions from greenhouse gases and our reliance on fossil fuels.

In addition to this, the NPPF is supportive of renewable and low carbon energy projects, such as the Proposed Development, assuming potential impacts are, or can be made acceptable. Paragraph 152 in Section 14 of the NPPF ‘Meeting the Challenge of Climate Change, Flooding and Coastal Change’ states:

“the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.

The Renewable and Low Carbon Energy NPPG, which supports the NPPF, sets out considerations for LPAs when determining planning applications for proposed ground-mounted solar developments. Each of these considerations is identified in Table 6.3 below, followed by an assessment of compliance of the Proposed Development.

Table 6.3: Renewable & Low Carbon Energy NPPG Assessment Criteria

Criteria	Assessment of the Proposed Development
<p><i>“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.”</i></p>	<p>There are a number of aspects to consider when siting a large-scale solar farm development. The purpose of the Proposed Development is to generate a renewable source of electricity, ultimately contributing towards the transition to a low carbon economy.</p> <p>The Agricultural Land Classification (ALC) Survey found that the land at the Application Site is majority Grade 3b (95.68%) with only one small area within the Application Site boundary consisting of Grade 3a (4.32%) located in Fields 9 and 12.</p> <p>The Ecological and BNG surveys found that there was no particular interest on the site in this regard and that the Proposed Development would result in an overall BNG of 74.2% for habitat units and a BNG of 22.04% for hedgerow units.</p> <p>The Application Site boundary is currently used as a dairy farm. The Proposed Development is designed to enable continued agricultural use and to be dual purpose in both solar and sheep grazing.</p>
<p><i>“Where a proposal involves greenfield land, whether (i) 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; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.”</i></p>	<p>The guidance acknowledges that agricultural land is appropriate for renewable energy developments, provided that it allows for continued agricultural use, or encourages biodiversity improvements around the arrays. An ecological survey has been undertaken and a Biodiversity Net Gain (BNG) calculation supports the application for planning permission. The suggested enhancement and habitat creation measures detailed in the BNG calculations provide for a long-term biodiversity increase across the site. The Proposed Development would result in an overall BNG of 74.2% for habitat units and a BNG of 22.04% for hedgerow units.</p> <p>The Guidance also identifies the temporary nature of solar farm developments, whereby planning conditions can be used to ensure that installations are removed at the end of the operational phase, with land restored to its previous use. During its operational phase, sheep grazing is proposed to take place at the Application Site, allowing for continued agricultural use. Following the decommissioning period of the solar farm, all of the components would be removed from the site and the land restored to its current agricultural use with the benefit of retaining the enhanced landscape and biodiversity value from the matured mitigation planting.</p>

	<p>A recent granted appeal decision by the Planning Inspectorate (Appeal Ref: APP/G2713/W/23/3315877)⁴² for a ground-mounted solar PV farm in Scruton, North Yorkshire determined that, despite North Yorkshire Council refusing the planning application on the grounds that the development was on Grade 2 agricultural land, the proposal would not result in the loss of agricultural land and it was concluded that there are no suitable alternative sites on lower grade land. The temporary nature of solar farm developments of 40 years and the ability for the land underneath and around the solar panels to be utilised for sheep grazing resulted in the Planning Inspectorate concluding this would not result in a loss of agricultural land.</p>
<p><i>“That solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use.”</i></p>	<p>The Proposed Development would be a temporary structure, with an operational phase of up to 40 years. Following the end of the operational phase, the Proposed Development would be removed, with the land restored as close as practicable to its current condition.</p>
<p><i>“The proposal’s visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety.”</i></p>	<p>All of these aspects have been considered in the specialist reports submitted alongside the planning application.</p> <p>Regarding visual impact, the Proposed Development has the capacity to accommodate the scale of the development within the vicinity of the Application Site and surrounding area without any significant effects on public amenity. As detailed in the LVIA, any significant visual effects would be restricted to residential, recreational and road user receptors crossing the site itself or located within 500m of which these effects can be reduced through appropriate landscape measures.</p> <p>The Glint and Glare Assessment concluded that impact on rail infrastructure and aviation infrastructure are out with the screening distance noted in guidance and were therefore not assessed further. Provided that on-site hedgerow is maintained to a height of 3m, the Proposed Development poses a low impact to residential dwellings.</p>
<p><i>“The need for, and impact of, security measures such as lights and fencing.”</i></p>	<p>Deer fencing would be constructed around the Application Site and security fencing constructed at the Client/DNO substation and BESS compound. Inward facing infrared CCTV cameras will be installed around the perimeter of the Proposed Development. There will be no artificial lighting around the site as CCTV is inward facing infra-red. However, floodlights are to be used for infrequent maintenance and operational activities only. Lighting will be manually controlled rather than PIR, in order to prevent unnecessary activation.</p>
<p><i>“Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.”</i></p>	<p>A Historic Environment Assessment has been undertaken for the Proposed Development. The assessment concludes that the Proposed Development will not have a significant impact on any designated or non-designated heritage assets and their settings located within or adjacent to the Application Site.</p>

⁴² UK Government: The Planning Inspectorate: Appeal Decision (Appeal Ref: APP/G2713/W/23/3315877). Available online: [CD121 Appeal Decision 3315877 Scruton.pdf](#)

<p><i>“The potential to mitigate landscape and visual impacts through screening with native hedges.”</i></p>	<p>The proposal reflects inputs from the landscape architect, ecologist and heritage specialist. The reinforcement of boundaries with trees and hedges has been proposed within the Landscape and Ecology Management Plan along with ensuring the general maintenance and gap filling of outer boundary hedges at the Application Site.</p>
<p><i>“The energy generating potential, which can vary for a number of reasons including latitude and aspect.”</i></p>	<p>Taking into account the latitude of the Application Site and the topography of the land, the Proposed Development would have a maximum generation capacity of 30MW with containerised battery storage units at the Application Site utilised for energy storage to aid in increasing the flexibility and generation opportunities of the site. The renewable electricity provided by the solar farm development would be distributed to the local electricity network.</p>

Therefore, it is concluded that the Proposed Development successfully accords with Policy N3: Low Carbon Sources & Renewable Energy, NPPF Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change and NPPG: Renewable and Low Carbon Energy.

In addition to local and national planning policy and guidance, there have been a number of publications in relation to national energy generation, net zero and energy security that can be considered material considerations of the Proposed Development, including:

- Overarching National Policy Statement for Energy (EN-1) (2023);
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023);
- The United Nations Framework Convention on Climate Change (1997);
- The Paris Agreement (2016);
- The Clean Growth Strategy (2017);
- The Climate Change Act (2008) (2050 Target Amendment) Order 2019;
- Climate Change Committee: The Sixth Carbon Budget: The UK's Path to Net Zero;
- Energy White Paper: Powering our Net Zero Future (2020);
- The Ten Point Plan for a Green Industrial Revolution (2020);
- National Infrastructure Strategy (2020);
- Net Zero Strategy: Build Back Greener (2021);
- BEIS Outcome Delivery Plan: 2021-2022;
- British Energy Security Strategy (2022); and
- Powering up Britain (2023).

The Energy White Paper states that the UK energy system is still largely dominated by the use of fossil fuels, which will need to change dramatically by 2050 if the net zero target is to be achieved. Decarbonising the energy system over the next thirty years means replacing – as far as possible– fossil fuels with clean energy technologies such as renewables. Many recent publications emphasise the importance of decarbonising the electricity system, with the deployment of low-cost renewable energy technologies being key, including solar developments.

The BESS specifically addresses solar generation across the UK, stating that there is currently circa 14GW of solar capacity in the UK, split across various scales of development, ranging from large scale to smaller scale roof-mounted solar. It is expected that solar development will increase five-fold by 2035, which would result in the need for an additional 70GW of solar generation to be built across the UK to help us get to Net Zero. In order to increase the deployment of solar across the UK, the BESS seeks to consult on:

“Amending planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place. We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.”

Of particular importance to the Proposed Development is the support within the BESS for the co-location of solar alongside other functions, including agriculture. As noted throughout this Planning Statement, the land within the Application Site comprises majority Grade 3b agricultural land. However, the Proposed Development is designed to enable sheep grazing beneath and between the solar arrays.

Additionally, given the nature of the Proposed Development, agricultural use can resume following the decommissioning phase and improvements to biodiversity would also remain once the Proposed Development is decommissioned. The agricultural land quality at the Application Site can also be enhanced by resting the land from more traditional intensive farming methods. The Proposed Development would therefore not result in the loss of agricultural land.

In addition to this, the Climate Change Committee Report further highlights the deployment capacity of solar PV, stating that the UK has the potential to install 145 – 516GW of solar capacity.

Therefore, it can be determined from the above assessment of material considerations that the Proposed Development is compliant.

6.3 Green Belt

A separate Green Belt Assessment has been submitted alongside the planning application which assesses the way in which the Proposed Development accords with NPPF Section 13: Protecting Green Belt land.

This assessment also details the very special circumstances of which the Proposed Development outweighs potential harm to the Green Belt.

6.4 Landscape

Policy N8: Landscape Character states that *“development proposals must be informed and be sympathetic to, landscape character and quality, demonstrated through local site-specific assessments in the context of the Staffordshire Landscape Character Assessment together with Historic Landscape Characterisation Assessment and the Historic Environment Character Assessment.”*

After discussion with the case officer, it was requested that a Landscape and Visual Impact Assessment (LVIA) was undertaken rather than a Landscape and Visual Appraisal (LVA) due to SBC not having an in-house Landscape Officer that could guarantee the application would be made valid as an LVA. This decision was not due to the application being an EIA as the screening response returned as a non-EIA development (application reference: 23/37774/ESS on SBC online planning search facility). As discussed from the LVIA, the Proposed Development has been designed with stand-offs to limit effects on the village of Fulford and its setting, and to reduce the effect on the PROWs that cross the Application Site and Saverley Green Road. Thus, significant effects would affect a relatively small number of receptors located on or within the immediate vicinity of the Application Site of which would be further mitigated through the implementation of suitable landscape measures set out in Figure 19: Landscape and Ecology Management Plan (LEMP) and Figure 20: Landscape and Ecology Management Plan (LEMP) Layout Enlargement. Therefore, an LVIA was not undertaken due to the possibility that the Proposed Development would have a significant impact and detriment to the surrounding landscape or have a profound visual impact.

The LVIA has been undertaken to assess the potential impact of the Proposed Development upon landscape and visual receptors. This report has taken into account the Staffordshire Landscape Character Assessment alongside the Historic Landscape Characterisation Assessment and the Historic Environment Character Assessment. Policy N8 details criteria that developments should adhere to in order to demonstrate how proposals with landscape and visual implications should protect, conserve and, where appropriate, enhance the local landscape. This assessment criteria is illustrated in Table 6.4 below.

Table 6.4: Policy N8 Assessment Criteria

Criteria	Assessment of the Proposed Development
a. The elements of the landscape that contribute to the local distinctiveness of the area (including heritage	The LVIA submitted alongside the planning application details the mitigation measures that have been adhered to in the design process in order to protect and conserve

assets, cultural character and biodiversity);	<p>the local distinctiveness of the area. These measures include:</p> <ul style="list-style-type: none"> • Removal of solar infrastructure from the fields to the southwest and southeast, reducing potential visibility from Fulford village and from Saverley Green Road; • Avoidance of the existing watercourse to the north of the site and ponds located at the Application Site with a 10m buffer; • A minimum setback of 7.5m from the Public Rights of Way (a larger setback has been achieved in some areas); • Additional planting on the western boundary to reduce potential visibility; and • Generally preserving existing hedgerows, trees and woodland through adhering to a 5m buffer.
b. Historic elements of the present-day landscape that contribute significantly to landscape character;	<p>The Proposed Development has been designed with stand-offs to limit effects on the village of Fulford and its setting, and to reduce effects on the footpaths that cross the Site and Saverley Road.</p> <p>Furthermore, as detailed in the Historic Environment Assessment, no significant impact on any historic elements of the present-day landscape is anticipated from the Proposed Development.</p>
c. The setting and views of or from heritage assets, including conversation areas. Registered Parks and Gardens, Scheduled Monuments, Listed Buildings and assets identified in the Historic Environment Record;	<p>As detailed in the Historic Environment Assessment and the LVIA, the Proposed Development is not anticipated to have a detrimental impact on the setting and views of or from any heritage assets in the surrounding area.</p>
d. The locally distinctive pattern of landscape elements such as woodland, streams, hedgerows, trees and field boundaries.	<p>As previously discussed, the vast majority of the hedgerow will be retained across the site throughout all phases of the Proposed Development. There would be the need however for short sections of hedge or scrub to be removed from field boundaries to facilitate track access or construction of fencing. Hedgerow would also be lost at the access point on Saverley Green Road to cater to the required visibility splays and access tracks. All other existing hedgerows will be retained and, where appropriate, enhanced through management in order to improve overall hedge condition as well as wider ecological benefits to biodiversity.</p> <p>Figure 19: Landscape and Ecology Management Plan (LEMP) and Figure 20: Landscape and Ecology Management Plan (LEMP) Enlargement submitted alongside the planning application detail the areas considered to be suitable for proposed tree planting and enhancement measures.</p>

Following this assessment criteria, it can be concluded that the Proposed Development accords with Policy N8: Landscape Character.

6.5 Sustainability

Spatial Principle SP1: Presumption in Favour of Sustainable Development states that *“when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants and communities jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”*.

The Proposed Development is for the successful delivery of a low carbon generating technology that would result in a maximum generation capacity of 30MW of solar energy alongside containerised battery storage units.

Renewable energy sources such as solar do not emit carbon dioxide and other greenhouse gases that contribute to global warming. The manufacturing of products will ultimately result in the emission of some carbon, including the components required for a solar array development. Recent research shows that the average carbon payback period for solar panels is generally between one and three years⁴³, therefore, the carbon emitted during the production process will be paid back in a short period of time. As manufacturing processes advance, it is likely that the carbon payback period for solar will decrease further.

Additionally, Spatial Principle SP6: Achieving Rural Sustainability highlights that *“priority will be given to supporting the rural sustainability of the Borough by protecting and enhancing its environmental assets and character whilst sustaining the social and economic fabric of its communities. This will be achieved by promoting:*

- i. A sustainable rural economy.*
- ii. Conservation or improvement of the rural environment.*
- iii. Appropriate rural housing schemes to achieve sustainable communities.*
- iv. The appropriate re-use of redundant buildings.*
- v. Use of sources for renewable energy.”*

The Proposed Development adheres to Criteria V above; ‘use of sources for renewable energy’. As concluded in the various specialists’ reports submitted alongside the planning application, the Proposed Development will not have a significant or detrimental impact on the environmental assets and character of the Application Site and surrounding area.

At a national level, Paragraph 7 of the NPPF states that *“the purpose of the planning system is to contribute to the achievement of sustainable development”*. In order to achieve sustainable development, the planning system has three overarching objectives: economic, social and environmental. Each of these objectives are independent and need to be *“pursued in mutually supportive ways”*. These objectives include:

- *“An economic objective – to help build strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- *An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently,*

⁴³ What is the Carbon Footprint of a Solar Panel? Overview and Emissions (2022). Available online: [What Is the Carbon Footprint of a Solar Panel? Overview and Emissions \(treehugger.com\)](https://www.treehugger.com/what-is-the-carbon-footprint-of-a-solar-panel-overview-and-emissions)

minimising waste and pollution, and mitigating and adapting climate change, including moving to a low carbon economy.”

The NPPF sets out that these objectives should be delivered through the preparation and implementation of plans and policies. Planning policies and decisions on planning applications should play an active role in guiding sustainable development.

Sustainable development is at the core of the Proposed Development, as it is a renewable energy proposal to provide electricity and contribute towards the transition to a low carbon economy.

Therefore, the Proposed Development successfully accords with Spatial Principle SP1: Presumption in Favour of Sustainable Development, Spatial Principle SP6: Achieving Rural Sustainability and NPPF Section 2: Achieving Sustainable Development.

6.6 Location of Proposed Development

Spatial Principle SP3: Stafford Borough Sustainable Settlement Hierarchy states that *“the majority of future development will be delivered through the Sustainable Settlement Hierarchy based on the following areas:*

1. *County Town of Stafford*
2. *Market Town of Stone*
3. *Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood/Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield.”*

The Proposed Development is not situated within any of the above-noted areas. By their very nature, solar farm developments are not normally located in villages or other built-up areas. This policy is also largely aimed at new residential development and employment uses, setting out the Council’s settlement strategy. Nonetheless, Spatial Principle SP3 aims to identify the hierarchy of settlements as a basis for establishing the future sustainable pattern of growth and facilities and as discussed previously, sustainability is at the heart of any solar farm development. Spatial Principle SP7: Supporting the Location of New Development discusses the criteria that must be met in order for development in other locations out with the areas noted in Spatial Principle SP3 to be supported. These criteria are listed in Table 6.5 below.

Table 6.5: Spatial Principle SP7 Assessment Criteria

Criteria	Assessment of the Proposed Development
i) If located within the Green Belt, it is consistent with national policies for the control of development and Policy E5;	<p>A Green Belt Assessment Report has been submitted alongside the planning application. This report details the way in which the Proposed Development accords with national policies for the control of development within the Green Belt. The report also details the benefits associated with the Proposed Development and the very special circumstances which outweigh the potential harm to the Green Belt. These include:</p> <ul style="list-style-type: none"> • Mitigation against climate change; • Low carbon energy generation; • Support of energy security; • Economic benefits; • Landscape enhancement; • Biodiversity enhancement; and • Protection of agricultural land. <p>Policy E5 is not relevant to the Proposed Development as it defines major development sites within the existing Green Belt where the Application Site is not situated.</p>

<p>ii) It is consistent with the objectives of Spatial Principles SP6, Policies E2 and C5 in supporting rural sustainability;</p>	<p>An assessment against Spatial Principle SP6 has been conducted in Section 6.2 and determines that the Proposed Development is consistent with the policy's objectives of supporting rural sustainability through the use of sources for renewable energy.</p> <p>Policy E2 focuses on rural areas outside the Green Belt and Policy C5 is in relation to residential properties outside the settlement hierarchy and therefore both are not relevant to the Proposed Development.</p>
<p>iii) It does not conflict with the environmental protection and nature conservation policies of the Plan;</p>	<p>The Proposed Development will not have a detrimental impact on the natural environment, as concluded in the Preliminary Ecological Appraisal (PEA). In addition to this, the LVIA concluded that the Proposed Development is not anticipated to have a significant impact or detriment to the surrounding landscape or have a profound visual impact to sensitive receptors. The Proposed Development seeks to protect and enhance the surrounding environment through the suggested enhancement and habitat creation measures detailed in Figure 19: Landscape and Ecology Management Plan (LEMP) and Figure 20: Landscape and Ecology Management Plan (LEMP) Enlargement and shown in the results of the Biodiversity Net Gain (BNG) calculations which detail that there is an overall BNG of 74.2% for habitat units and a BNG of 22.04% for hedgerow units.</p>
<p>iv) Provision is made for any necessary mitigating or compensatory measures to address any harmful implications.</p>	<p>As concluded from the various specialist reports undertaken and submitted alongside the planning application, the Proposed Development is not anticipated to result in any harmful implications.</p>

In addition to this, Spatial Principle SP7 also notes that *“development proposals should maximise the use of brownfield redevelopment sites within the Borough’s towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.”*

Alternative sites were considered during the site selection process as discussed in Section 2.6. There is just over 48 hectares of brownfield land spread across 23 different locations in the Stafford Borough area, with an average area of 2 hectares. These are not practicable for ground-mounted solar projects. The Application Site was therefore considered the most appropriate location for the Proposed Development.

Furthermore, Policy 3: Safeguarding Minerals of Local and National Importance and Important Infrastructure of The Minerals Local Plan for Staffordshire (2015 to 2030) (MLPS) states that *“within a Mineral Safeguarding Area, where important mineral resources do exist, except for those types of development set out in Appendix 6, non-mineral development should not be permitted unless it has been demonstrated that:*

- a) The non-mineral development is temporary and does not permanently sterilise the mineral; or*
- b) The material planning benefits of the non-mineral development would outweigh the material planning benefits of the underlying or adjacent mineral; or*
- c) It is not practicable or environmentally acceptable in the foreseeable future to extract the mineral.”*

As can be determined from the Policies and Proposals Map for the MLPS⁴⁴, the Application Site partially falls within an area identified for Mineral Safeguarding. Appendix 6 of the MLPS lists the exemptions criteria

⁴⁴ Staffordshire County Council: Policies and Proposals Map for the Minerals Local Plan for Staffordshire (2015-2030). Available online: [Minerals Local Plan - Policies & Proposals Map - February 2017 \(staffordshire.gov.uk\)](https://www.staffordshire.gov.uk/minerals-local-plan-policies-proposals-map)

for mineral safeguarding. The Proposed Development is considered exempt from the list through Criterion 10 “Applications for temporary planning permission”. Alongside this, Criterion a) above lists temporary development as acceptable. As detailed in Section 3.5, the operational phase of the Proposed Development is expected to take place over a period of 40 years, following which, the Proposed Development would be decommissioned, and all components removed from the site. The land at the application site would then be reinstated as close as practicable to its original condition and former use; a commercial farm. Following this, the potential for the site to be used for mineral extraction in the future remains unaffected.

As can be concluded from the above assessment, the Proposed Development successfully accords with Spatial Principle SP3: Stafford Borough Sustainable Settlement Hierarchy, Spatial Principle SP7: Supporting the Location of New Development and MLPS Policy 3: Safeguarding Minerals of Local and National Importance and Important Infrastructure.

6.7 Design

The key policy that addresses design and the Proposed Development is Policy N1: Design. Consideration of the Design Supplementary Planning Document has also been included within the following assessment. Criteria have been set out within Policy N1 that all developments are expected to meet when securing enhancements in design quality. These criteria are set out in Table 6.6 below.

Table 6.6: Policy N1 Assessment Criteria

Criteria Use	Assessment of the Proposed Development
a. Ensure that, where relevant the scale, nature and surroundings, major applications are comprehensively master planned or, where appropriate, are accompanied by a development brief;	A Landscape and Ecology Management Plan has been submitted alongside the planning application.
b. Be designed, sited and grouped in order to provide access for all;	<p>Access to the Proposed Development will only be required for construction vehicles and thereafter any maintenance vehicles during the operational phase of the development.</p> <p>Two Public Rights of Way (PRoW) routes are located within the Application Site Boundary (Fulford 12 and Fulford 15, both of which are Category C footpaths). During construction, the PRoWs will remain open at all times, with priority given to the users of the PRoWs. There will be banksmen where the PRoWs are crossed by the access track to supervise any manoeuvres.</p> <p>The Proposed Development has been designed to ensure that all infrastructure has been set back from the PRoWs by a minimum of 7.5m. Alongside this, existing hedgerows and the proposed native species hedge will be planted and maintained to 3.5m to aid in screening the Proposed Development from users of the PRoWs.</p>
c. New development of ten dwellings or more should demonstrate compliance with the Building for Life 12 assessment and any successor documents, unless it makes the development unviable or it has been sufficiently demonstrated, through a	This criterion is not applicable to the Proposed Development.

Design & Access Statement, that each of the twelve Building for Life questions has been optimally addressed, or conversely why it is not practical or appropriate to do so;	
Form	
d. Incorporate sustainable construction and energy conservation techniques into the design in accordance with Policy N2;	The Proposed Development is for the construction and operation of a solar PV farm, containerised battery storage units and other essential infrastructure that incorporate sustainable construction and materials and utilises renewable energy, therefore in accordance with Policy N2: Climate Change.
e. Require the design and layout to take account of noise and light implications, together with the amenity of adjacent residential areas or operations of existing activities;	<p>Although the solar panels themselves do not generate noise, the associated infrastructure can generate limited noise throughout the operational phase. These components of the Proposed Development have been sited away from potentially sensitive receptors. No specific noise mitigation is required. Please see the Noise Assessment submitted alongside the planning application for more detail.</p> <p>Artificial light would be utilised during the construction phase and during construction hours which are proposed to be:</p> <ul style="list-style-type: none"> ▪ 07:00 to 19:00 on weekdays; and ▪ 08:00 to 16:00 on Saturdays. <p>The only exception to this is the floodlights present on the Client/DNO Substation and BESS compound which would be used for infrequent maintenance and operational activities only. Lighting will be manually controlled rather than PIR, preventing unnecessary activation.</p> <p>Therefore, light implications are not considered to have a significant impact.</p>
f. Retention of significant biodiversity, landscaping features, and creation of new biodiversity areas that take into account relevant local information and evidence;	<p>The vast majority of the hedgerow will be retained across the site throughout all phases of the Proposed Development. There would be the need however for short sections of hedge or scrub to be removed from field boundaries to facilitate track access or construction of fencing. Hedgerow would also be lost at the access point on Saverley Green Road to cater to the required visibility splays and access tracks. All other existing hedgerows will be retained and, where appropriate, enhanced and managed in order to improve overall hedge condition as well as wider ecological benefits to wildlife.</p> <p>The Landscape and Ecology Management Plan illustrates the areas considered to be suitable for proposed planting and enhancement measures.</p>

	The Biodiversity Net Gain calculations show that there will be an increase of 74.2% in habitat units and 22.04% in hedgerow units.
g. Include high design standards that make efficient use of land, promote activity and takes into account the local character, context, density and landscape, as well as complementing the biodiversity of the surrounding area;	<p>The design of the Proposed Development has taken into account all potential constraints of the Application Site and has been situated carefully out with these areas.</p> <p>The Proposed Development will ensure there is ability for the land to be dual use as both a solar and sheep grazing site.</p> <p>As concluded from the LVIA, the Proposed Development will not have a significant impact on the local character of the Application Site and surrounding area. The hedgerow planting proposed at the Application Site will be done using local species in order to enhance the landscape character and to ensure the Proposed Development is screened from view.</p>
h. Designs must have regard to the local context, including heritage assets, historic views and sight lines, and should preserve and enhance the character of the area including the use of locally distinctive materials;	<p>As discussed in the LVIA, the Proposed Development is largely screened from view and further mitigation is proposed at the Application Site in the form of landscape planting.</p> <p>The Historic Environment Assessment concludes that the Proposed Development will not have a significant impact on any designated or non-designated heritage assets and their settings located within or adjacent to the Application Site. Additionally, the historic landscape character of the site will be retained within the layout of the Proposed Development.</p>
Space	
i. Strengthen the continuity of street frontages and enclosure of space;	This criterion is not applicable to the Proposed Development.
j. Development should clearly distinguish between public and private space, and provide space for storage, including recycling materials;	<p>The Proposed Development is largely screened from view by surrounding hedgerows and woodland and the A50 to the north of the site, as detailed in the LVIA. Mitigation planting has also been proposed in order to limit any potential views further.</p> <p>In addition to this, the Application Site boundary will be fenced off using deer fencing in order to establish public and private space. Storage containers are also proposed near the Client/DNO Substation and at inverter hardstandings.</p>
k. Streets and public open spaces are designed to be usable, easy to maintain and productive for the amenity of residents by being overlooked to create a safe environment;	This criterion is not applicable to the Proposed Development.

l. Require the design and layout of new development to be safe, secure and crime resistant, by the inclusion of measures to address crime and disorder through environmental design and meet “Secured by Design” Standards;	As detailed in Section 3.2, fencing and security measures are to be implemented alongside the Proposed Development in the form of deer fencing along the perimeter of the site, standard wire mesh fencing around the substation and BESS facility and inward facing infrared CCTV cameras for health and safety and security reasons.
m. Development should be well-connected to public transport and community facilities and services, and be well laid out so that all the space is used efficiently, is safe, accessible and user-friendly;	This criterion is not applicable to the Proposed Development.
n. Where appropriate, development should ensure that there is space for water within the development layout to facilitate the implementation of Sustainable Drainage Systems (SUDS).	The FRA and Drainage Strategy submitted alongside the planning application details the way in which the Proposed Development will facilitate the implementation of SUDS.
Movement	
o. Ensure that places inter-connect using important routes and linkages, including Rights of Way, which are pedestrian, vehicle and cycle friendly, whilst allowing for ease of movement, legibility and permeability through a clearly defined and well-structured public realm; and	There are two Public Rights of Way (PRoW) within the Application Site Boundary (Fulford 12 and Fulford 15, both of which are Category C footpaths). During construction, the PRoWs will remain open at all times, with priority given to the users of the PRoWs. There will be banksmen where the PRoW is crossed by the access track to supervise any manoeuvres.
p. Ensure car parking is well integrated and discreetly located.	There will be provision for parking at the construction compounds in the Application Site boundary for necessary construction vehicles and any maintenance vehicles during the operational period of the Proposed Development. The construction compounds have been carefully and discreetly located in order to reduce any potential visual impact from road users or users of the PRoWs.

As can be concluded from the above assessment, the Proposed Development complies with the provisions of Policy N1: Design and the Design Supplementary Planning Document.

6.8 Flood Risk and Water Management

Policy N2: Climate Change states that *“all development must incorporate sustainable design features to facilitate a reduction in the consumption of natural resources, improve the environmental quality and mitigate against the impact of climate change. Proposals must take particular account of the need to ensure protection from, and not worsen the potential for, flooding.”*

At a national level, Paragraph 14 of the NPPF states that *“inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)”*.

A Flood Risk Assessment (FRA) was undertaken and is submitted alongside the planning application, which provides a more detailed commentary on this matter. The report determines that fluvial flooding from the unnamed tributary of the River Blithe is the main potential source of flood risk to the site. Both local topographic survey levels and the EA FMfP suggest any overtopping water would follow the local topography and the general route of the watercourse towards the east. The unnamed watercourse is not an EA designated main river. The associated flood zones are understood to be the product of a national

scale modelling exercise using JFlow software or similar and therefore the EA surface water flood maps may offer a more appropriate assessment of flood risk to the site from this watercourse in this instance.

The EA Flood Map for Surface Water indicates there is a very low likelihood of pluvial flooding across much of the site, with higher risk shown along the route of the unnamed watercourse to the north and in the vicinity of an existing pond feature in the centre of the site. Small local depressions across the site are shown to be at low risk of pluvial flooding. The EA Flood Map for Surface Water can also be used to highlight potential fluvial risk from smaller watercourses either not represented or poorly represented by the EA FMfP. No significant additional flow routes are shown, suggesting the fluvial risk from smaller watercourses is also low.

Solar panels can be considered water-compatible up to depths of around 1m, therefore it should be possible to install panels within areas highlighted to be at risk of flooding. Comparison of the EA surface water flood extent (low likelihood) with underlying topographic survey where available and EA LiDAR DTM data elsewhere (outside the site boundary, 1m resolution, dated 2022), produces a map of flood depths through the site, shown in Figure 8 in the FRA. This flood depth map shows depths outside an 8m easement from the banks of the unnamed watercourse remain below 1m, suggesting solar panels can be installed up to the 8m buffer, derived from EA Guidance Documentation⁴⁵.

In addition to this, a 10m buffer has been implemented in design in order to adhere to the 8m buffer and more for caution.

Additionally, Paragraph 14 of the NPPF highlights that *“major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*

- a) Take account of advice from the lead local flood authority;*
- b) Have appropriate proposed minimum operational standards;*
- c) Have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d) Where possible, provide multifunctional benefits.”*

Furthermore, Policy N2 sets out the expectations of new developments incorporating Sustainable Drainage Systems (SUDS). The policy states that *“each system should:*

- 1. Discharge clean roof water to ground via infiltration techniques such as soakaways, unless demonstrated by an infiltration test that due to ground conditions or underlying contamination, this is not possible;*
- 2. Limit surface water discharge to the greenfield run-off rate or, where this is demonstrated to not be viable, a minimum of 20% reduction from the existing situation;*
- 3. Improve the water quality of run-off by ensuring that foul and surface water run-off are separated;*
- 4. Protect and enhance wildlife habitats, existing open spaces/playing fields, heritage assets. Amenity and landscape value of the site, as well as being sympathetically designed to meet the needs of the local community, based on the scale and location of the new development”.*

Alongside the FRA, a Drainage Strategy has been submitted with the planning application. This report found that there are no significant changes in land cover or land use planned by the scheme design. The nature of the Proposed Development consists of solar panel modules which are raised off the ground, therefore not reducing existing permeable areas. It is generally accepted that runoff from the solar panels will fall to the ground below where it will naturally infiltrate. It is possible that runoff from the solar panels will be concentrated along the drip line. This could lead to an increase in ponding of water and increased runoff from the site below the solar panel module. However, as the site is to remain grass beneath the solar panel modules, this will assist in controlling surface water runoff and maintaining a relatively natural infiltration capacity. It is considered that well maintained and established vegetation will dissipate the runoff along the drip line and allow water to runoff or infiltrate, mimicking the pre-development scenario.

⁴⁵ Environment Agency (2022): Flood Risk Activities: Environmental Permits. Available online: [Flood risk activities: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/flood-risk-activities-environmental-permits)

The solar array will involve the placement of impermeable surfaces associated with the solar panels. This will consist of approximately 10,230m² of hardstanding in the form of BESS areas and the substation and AC-AC storage, accounting for approximately 1.5% of the total site area. Hardstanding at each of the BESS sites will have a negligible impact on runoff given the relatively minor area of each site, and that each site is surrounded entirely by greenfield land. Therefore, the BESS sites will have negligible impact on the existing runoff rates, volumes, or flow routes and no localised storage is required. Surface water runoff from hardstanding areas associated with the substation will discharge to the unnamed watercourse passing through the north of the site at a rate of 2.1l/s. Surface water runoff up to the 1 in 100 year plus 25% climate change allowance event will be attenuated on site. An estimated total attenuation volume of 284m³ will be required to achieve the discharge rate. The proposed surface water drainage scheme will ensure no increase in runoff over the lifetime of the development.

Therefore, the Proposed Development successfully accords with Policy N2: Climate Change and NPPF Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change.

6.9 Biodiversity

Local and national policies and guidance that aim to protect and enhance local biodiversity include:

In the Adopted Local Plan:

- Policy N4: The Natural Environment & Green Infrastructure; and
- Policy N5: Sites of European, National & Local Nature Conservation Importance.

Other guidance and statute include:

- NPPF Section 15: Conserving and Enhancing the Natural Environment;
- NPPG: Natural Environment; and
- The Environment Act 2021.

Policy N4 on Protecting Biodiversity and Geodiversity states that all development should meet the following criteria detailed in Table 6.7 below.

Table 6.7: Policy N4 Assessment Criteria

Criteria	Assessment of the Proposed Development
<p>a. Implementation of the Staffordshire Biodiversity Action Plan, the Stafford Borough Green Infrastructure Strategy and guidance including 'Biodiversity by Design' or any other successor documents to increase and enhance biodiversity, in terms of habitats and species as well as geological conservation or geodiversity through appropriate management for a network of:</p> <ul style="list-style-type: none"> • Designated sites (international, national, regional and local); • Biodiversity Action Plan habitats and species populations; • Wildlife Corridors and Ecological Networks; 	<p>When undertaking the Preliminary Ecological Appraisal (PEA), information was requested from Staffordshire Ecological Record (SER) on the priority habitats and species listed within the Staffordshire Biodiversity Action Plan (SBAP).</p> <p>There are two statutory designated sites identified within 5km of the Application Site boundary: Barlaston and Rough Close Common Local Nature Reserve (LNR) and Coyney Woods LNR. Details of this are included in the PEA. The PEA concluded that based on the lack of ecological connectivity, no adverse impacts are anticipated at these sites.</p> <p>There are six non-statutory designated sites located within 2km of the Application Site boundary; New Inn Biodiversity Alert Site (BAS), Mount Pleasant Local Wildlife Site (LWS), Blythe Bridge Woods BAS, Stallington Heath LWS, Blacklake Plantation BAS and Hose Wood LWS and Ancient Woodland Inventory site. Details of this are included in the PEA. Due to there only being two short sections of hedgerow to be removed as part of the Proposed Development to allow for access</p>

and the ecological separation of certain sites, there are no adverse impacts anticipated at any non-statutory designated sites.

The grassland habitats found on the site have been improved through the application of fertilisers and grazing which has impacted the diversity of plant species present. All grasslands that were recorded within the site in the PEA are species-poor and of little ecological value.

Hedgerows recorded throughout the site consisted of native species and consistently contained mature trees. Condition assessments were conducted on all the hedges and consistently found that many hedgerows, particularly to the north of the site, had been subjected to a hard cut/flail which resulted in reduced overall height and width to below 1.5m, contained gaps and lacked a natural vegetation buffer between fields. In comparison, many of the hedgerows in the south of the site have been completely unmanaged.

All areas of woodland found on site are potentially of value for a range of wildlife. No tree felling or woodland clearance will take place as part of the Proposed Development. Approximately 90m of hedgerow is required to be removed at the Application Site for the inclusion of access tracks and the access point at Saverley Green Road. Nonetheless, the BNG Report details that there will be an increase of 22.04% in hedgerow units at the site.

In addition, the hedgerows and woodlands within the site boundary have potential ecological value for invertebrates due to the variety of native flowering and fruiting species present, the presence of butterfly and moth caterpillar foodplants and dead wood for saproxylic species. The impact of the Proposed Development on invertebrates is anticipated to be negligible if woodland and hedgerows are retained (excluding the small areas to be removed for access). As highlighted in the LEMP, the introduction of bee banks are included in the Application Site boundary to enhance the invertebrate population. Furthermore, the introduction of hedgerow planting and enhancement will benefit the local invertebrates.

Nine suitable standing waterbodies for Great Crested Newts (GCN) were identified within the site and a further three immediately adjacent to the Application Site boundary. Habitat Suitability Index (HSI) assessments were conducted for these twelve ponds during the field survey. All ponds along with better quality terrestrial habitat for GCN are to be retained and only the improved grasslands are to be developed. Impacts on the improved grassland are anticipated to be temporary and limited to the construction phase only; the foraging habitat quality for GCN should improve post-development provided the proposed enhancement measures detailed in the PEA are implemented. A

	<p>District Level Licensing (DLL) scheme for GCN is operated in Staffordshire by NatureSpace Partnership and covers the site. A GCN DLL was applied for in November 2023. It is considered likely that GCN mitigation will be achieved through the DLL.</p> <p>Regarding breeding birds, as previously stated, it is anticipated that approximately 90m of hedgerow will be removed for access in and around the site. It is recommended that these works are scheduled outside of breeding bird season (March – August inclusive) in order to prevent disturbance to nesting birds. If this is not possible, all hedgerows to be removed should be checked for nesting birds by an ECoW ahead of any vegetation clearance works as appropriate exclusion zones implemented if nests are found.</p> <p><u>Bats</u></p> <p>Numerous mature and some likely veteran trees with suitable features to support roosting bats were recorded throughout the site within areas of woodland or within hedgerows. The Proposed Development will not require any tree felling and therefore there should be a limited impact on roosting bats. A 30m buffer around trees with the potential for bat roosting was implemented during the design stage in order to ensure limited impact on roosting bats during the construction period.</p> <p>Habitats within the site boundary are considered highly suitable for commuting and foraging bats due to the prevalence of native woodland, hedgerow and open water and their connectivity to similar habitats within the wider landscape. No tree felling and only a limited amount of hedgerow removal is anticipated as a result of the Proposed Development. The key bat commuting and foraging corridors would therefore be maintained and, aside from a small amount of temporary disturbance, no overall decline in the quality of habitats for commuting or foraging bats its anticipated for bats.</p> <p><u>Badger</u></p> <p>The mix of open grassland and wooded habitats on site are considered highly suitable for foraging badger. Due to the volume of badger activity recorded on site a badger license to disturb and/or exclude may be required to be obtained from Natural England.</p>
<p>b. Conservation and enhancement of water courses and their setting for their landscape character, biodiversity and recreational value, particularly for the Borough's extensive rivers and extensive canal system;</p>	<p>The Application Site of the Proposed Development has one watercourse to the north of the site running directly through it that has been assessed as the main potential source of flooding at the site.</p> <p>As previously discussed, solar panels can be considered water-compatible up to depths of around 1m, therefore it should be possible to install panels within areas highlighted to be at risk of flooding. A 10m buffer has been implemented in design in order to adhere to the 8m buffer derived from EA Guidance and more for caution. The Proposed Development will also be including a</p>

	<p>raised freeboard for modules located closest to the flood extent.</p> <p>As discussed in the PEA submitted alongside the planning application, all ponds, along with higher quality terrestrial habitat, are to be retained as part of the proposed works. A GCN DLL was applied for in November 2023.</p>
<p>c. Protecting, conserving and enhancing the natural and historic environment and irreplaceable semi-natural habitats, such as ancient woodlands, and ancient or veteran trees;</p>	<p>As discussed in the PEA, the Proposed Development does not require the removal of irreplaceable semi-natural habitats.</p> <p>The vast majority of the hedgerow will be retained across the site throughout all phases of the Proposed Development. There would be the need however for short sections of hedge or scrub to be removed from field boundaries to facilitate track access or construction of fencing. Hedgerow would also be lost at the access point on Saverley Green Road to cater to the required visibility splays and access tracks. All other existing hedgerows will be retained and, where appropriate, enhanced and managed in order to improve overall hedge condition as well as wider ecological benefits to wildlife.</p>
<p>d. Increasing the ability of landscapes and ecosystems to adapt to different weather patterns and climate change, by increasing the range and extent of habitats, informed by Biodiversity Opportunity mapping;</p>	<p>The Proposed Development has been designed such that sheep grazing can take place on the land beneath and between the solar arrays.</p> <p>Furthermore, as detailed in the Biodiversity Net Gain Report submitted alongside the planning application, the Proposed Development will increase the range and extent of habitats with an increase of 74.2% in habitat units and an increase of 22.04% in hedgerow units at the Application Site.</p>
<p>e. Ensuring that no new development takes place in areas where environmental risks, particularly flooding, cannot be properly managed;</p>	<p>An area of potential flood risk was identified from the unnamed tributary to the River Blithe. Details of potential flood risk can be found in the FRA submitted alongside the planning application. The tributary is not an EA designated main river and the EA surface water maps offer a more appropriate assessment of fluvial flood risk to the site in this instance. Comparison of the low likelihood surface water flood extent and the underlying DTM data suggests that flood depths remain below 1m outside an 8m easement from the banks of the unnamed watercourse. As a water-compatible development, solar panels can be installed up to the easement. Therefore, the Proposed Development is not taking place in an area where environmental risk cannot be properly managed.</p>
<p>f. Any new development where damage to the natural environment is unavoidable must include measures to mitigate and/or compensate such impacts, through the establishment of replacement habitats or features, including</p>	<p>No damage to the natural environment is anticipated from the Proposed Development.</p> <p>The BNG for the Proposed Development demonstrates a 74.2% increase in Habitat Units and a 22.04% increase in hedgerow units through enhancing biodiversity at the Application Site.</p>

appropriate site management regimes.	
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Furthermore, Policy N5 on Sites of European, National & Local Nature Conservation Importance states that all development should meet the following criteria detailed in Table 6.8 below.

Table 6.8: Policy N5 Assessment Criteria

Criteria	Assessment of the Proposed Development
<p>The highest level of protection will be given to European Sites, with new development only permitted where:</p> <ol style="list-style-type: none"> There will be no adverse effect on the integrity of any European site, or If adverse effects are identified, it can be demonstrated that the proposed mitigation measures show that there will be no adverse effect on the integrity of any European site; or If it cannot be ascertained that no adverse effect on integrity will result, the proposed development will only be able to proceed where there is no alternative solution and there are imperative reasons of overriding public interest. 	<p>As detailed in PSB1, within Stafford Borough, there are the following European sites:</p> <ul style="list-style-type: none"> Cannock Chase Special Area of Conservation (SAC); Chartley Moss SAC (under the West Midlands Meres and Mosses SAC); and Pasturefields Salt Marsh SAC. <p>The Proposed Development is not located within or in the vicinity of any of the above European Sites and therefore will not result in adverse effects on these SACs.</p>
<p>In relation to air quality issues identified, planning permission will only be granted where:</p> <ol style="list-style-type: none"> It can be demonstrated that development will not significantly contribute to adverse effects caused by local and/or diffuse air pollution at European Sites, alone or in combination with other plans and projects; or Where development would result in an increase in local and/or diffuse air pollution at European Sites it would be expected to include measures in line with the Staffordshire Local Transport Plan towards securing an equivalent improvement in air quality, or reduction in emissions from other sources; and Require a pollution-neutral strategy for major development near to European sites. 	<p>Due to the nature of the Proposed Development, there will be no impact on air quality. Additionally, the Application Site is of a sufficient distance from the above listed European Sites that the Proposed Development would not have an adverse effect.</p>
<p>In relation to water quality, supply and run-off issues, planning permission will only be granted where:</p> <ol style="list-style-type: none"> There will be no demonstrable impact on the integrity of the European site; 	<p>Due to the nature of the Proposed Development, it will not have an impact on water quality or supply.</p> <p>It is generally accepted that runoff from the solar panels will fall to the ground below where it will naturally infiltrate. It is possible that runoff from the solar panels will be concentrated along the drip line. This could lead</p>

<p>b. The development takes account of the Water Cycle Study and Surface Water Management Plan and any other successor documents.</p>	<p>to an increase in ponding of water and increased runoff from the site below the solar panel module. However, as the site is to remain grass beneath the solar panel modules, this will assist in controlling surface water runoff and maintaining a relatively natural infiltration capacity. It is considered that well maintained and established vegetation will dissipate the runoff along the drip line and allow water to runoff or infiltrate, mimicking the pre-development scenario.</p> <p>The solar array will involve the placement of impermeable surfaces associated with the solar panels. This will consist of approximately 10,230m² of hardstanding in the form of BESS areas and the substation and AC-AC storage, accounting for approximately 1.5% of the total site area. Hardstanding at each of the BESS sites will have a negligible impact on runoff given the relatively minor area of each site, and that each site is surrounded entirely by greenfield land. Therefore, the BESS sites will have negligible impact on the existing runoff rates, volumes, or flow routes and no localised storage is required. Surface water runoff from hardstanding areas associated with the substation will discharge to the unnamed watercourse passing through the north of the site at a rate of 2.1l/s. Surface water runoff up to the 1 in 100 year plus 25% climate change allowance event will be attenuated on site. An estimated total attenuation volume of 284m³ will be required to achieve the discharge rate. The proposed surface water drainage scheme will ensure no increase in runoff over the lifetime of the development.</p>
<p>Developments likely to affect Sites of Specific Scientific Interest will not be permitted unless the reasons for the development clearly outweigh the nature conservation value of the site itself and the national policy to safeguard the national network of such sites. Cumulative effects will also be considered.</p> <p>Development likely to have an adverse effect (either directly or indirectly) on:</p> <ul style="list-style-type: none"> - A Local Nature Reserve - A Site of Biological Importance or a Biodiversity Alert Site - A Local Geological Site - A natural watercourse, lakes, reservoirs, rivers, canals and groundwater areas, including Water Framework Directive protected areas as listed in the Humber and Severn River Basin Management Plans. <p>Will not be permitted unless:</p> <p>(a) It can be clearly demonstrated that there are reasons for the proposal</p>	<p>There are no Sites of Specific Scientific Interest (SSSIs) located within 5km of the application Site. Therefore, the Proposed Development is of a sufficient distance from environmental receptors at these sites. There are two statutory designated sites located within 5km of the Application Site, both Local Nature Reserves (LNRs): Barlaston and Rough Close Common and Coyney Woods. Nonetheless, as detailed in Table 6.7, no adverse impacts are anticipated on any statutory or non-statutory designated sites from the Proposed Development.</p> <p>No adverse effect is anticipated on any Sites of Biological Importance or Local Geological Sites.</p> <p>The EA Flood Map for Surface Water indicates there is a very low likelihood of pluvial flooding across much of the site, with higher risk shown along the route of the unnamed watercourse to the north and in the vicinity of an existing pond feature in the centre of the site. Small local depressions across the site are shown to be at low risk of pluvial flooding. The EA Flood Map for Surface Water can also be used to highlight potential fluvial risk from smaller watercourses either not represented or poorly represented by the EA FMfP. No significant additional flow routes are shown, suggesting the fluvial risk from smaller watercourses is also low.</p>

<p>that outweigh the need to safeguard the special ecological/geological interest of the site.</p> <p>(b) It has been demonstrated, where development would result in significant harm, that it can not be reasonably located on an alternative site that would result in less or no harm.</p> <p>(c) Harm can be prevented, minimised, adequately mitigated or compensated for.</p>	<p>Solar panels can be considered water-compatible up to depths of around 1m, therefore it should be possible to install panels within areas highlighted to be at risk of flooding. Comparison of the EA surface water flood extent (low likelihood) with underlying topographic survey where available and EA LiDAR DTM data elsewhere (outside the site boundary, 1m resolution, dated 2022), produces a map of flood depths through the site, shown in Figure 8 in the FRA. This flood depth map shows depths outside an 8m easement from the banks of the unnamed watercourse remain below 1m, suggesting solar panels can be installed up to the 8m buffer, derived from EA Guidance Documentation⁴⁶.</p> <p>In addition to this, a 10m buffer has been implemented in design in order to adhere to the 8m buffer and more for caution. The Proposed Development will also be including a raised freeboard for modules located closest to the flood extent.</p> <p>Development has also been set back at a distance of 10m at ponds located within Application Site in order to preserve potential habitat and landscape character.</p>
<p>Where development is permitted, SBC requires all developers to:</p> <ol style="list-style-type: none"> Minimise disturbance; Protect and enhance the site's ecological value; Ensure appropriate management; Ensure appropriate mitigation measures are designed into the proposal and work on the site does not commence until these measures are in place; Work to approved methods; and Create new or replacement habitats equal to or above the current ecological value of the site if damage or loss is unavoidable. <p>Where possible, the preservation, restoration and re-creation of priority habitats and the recovering of priority species populations will be encouraged in line with the Staffordshire Biodiversity Action Plan.</p> <p>New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient</p>	<p>As noted in the PEA and BNG, the Proposed Development adheres to this assessment criteria. Furthermore, the NPPG on Natural Environment states that <i>"it is good practice to establish a detailed management plan to ensure appropriate management of the habitat in the long term, and to arrange for regular but proportionate monitoring on how the habitat creation or enhancement is progressing, indicating any remedial action necessary."</i> The LEMP illustrates the areas for proposed tree planting and mitigation measures.</p> <p>Additionally, under the 2021 Environment Act, all new development in England will have to demonstrate a Biodiversity Net Gain of at least 10% from January 2024. As identified in the BNG Report, the Proposed Development demonstrates a BNG increase of 74.2% in Habitat Units and 22.04% in hedgerow units following the development of the proposed solar farm. Therefore, the Proposed Development accords and exceeds the requirements of the Environment Act.</p>

⁴⁶ Environment Agency (2022): Flood Risk Activities: Environmental Permits. Available online: [Flood risk activities: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/flood-risk-activities-environmental-permits)

woodland, veteran trees or ancient or species-rich hedgerows.	
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Furthermore, NPPF Section 15: Conserving and Enhancing the Natural Environment discusses the way in which planning policies and decisions should contribute to and enhance the natural and local environment. The criteria assessing this is detailed in Table 6.9 below.

Table 6.9: NPPF Section 15 Assessment Criteria

Criteria	Assessment of the Proposed Development
a. Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);	<p>The Proposed Development will result in 74.2% BNG habitat units increase at the Application Site alongside a 22.04% BNG increase in hedgerow units, enhancing and protecting the biodiversity at the Application Site.</p> <p>Measures such as design buffers set back from areas for potential bat roosting and badger setts are included in the Proposed Development alongside no felling of trees and a limited loss of hedgerow at the Application Site in order to reduce impact on habitats.</p>
b. Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;	<p>It is acknowledged that the Proposed Development is located on greenfield land. Nonetheless, 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.</p> <p>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, protecting the local countryside from encroachment.</p> <p>In addition to this, an ALC Survey was undertaken at the site, determining that the land comprises 95.68% ALC Grade 3b. The agricultural quality at the Application Site can be enhanced through the continued use of the land under the panels for agriculture.</p>
c. Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;	This criterion is not applicable to the Proposed Development.
d. Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;	As previously discussed, there will be an increase of 74.2% BNG habitat units at the Application Site alongside a 22.04% BNG increase in hedgerow units. The creation and enhancement taking place at the site will ensure that established and maintained coherent ecological networks are at the site. These features will also remain following the decommissioning phase of the Proposed Development.
e. Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by,	Due to the nature of the Proposed Development, it will not result in soil, air or water pollution or land instability.

unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and	<p>The Noise Assessment undertaken at the Application Site concluded that noise levels resulting from the operation of the Application Site will generally be low and no specific noise mitigation is required.</p> <p>The introduced of hedgerow and tree planting alongside enhancement of existing hedgerow and grassland at the Application Site will benefit the local wildlife populations.</p>
f. Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	This criterion is not applicable to the Proposed Development as it is not situated in an area of contaminated and unstable land. It is located in a greenfield site currently used as a dairy farm.

The Proposed Development therefore accords with the provisions of Policy N4: The Natural Environment & Green Infrastructure, Policy N5: Sites of European, National & Local Nature Conservation Importance and NPPF Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change, NPPF Section 15: Conserving and Enhancing the Natural Environment, NPPG: Natural Environment and The Environment Act 2021.

6.10 Historic Environment

There are a number of policies which aim to protect and conserve the local cultural heritage and archaeological resource, including:

- Policy N9: Historic Environment;
- NPPF: Section 16; and
- NPPG: Historic Environment.

Policy N9: Historic Environment states that *“proposals that would affect the significance of a heritage asset will not be accepted for consideration unless they provide sufficient information for that impact to be assessed.*

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.

Table 6.10 notes the assessment criteria that needs to be taken into account for development proposals in order to avoid all potential loss or harm to the significance of heritage assets, including its setting.

Table 6.10: Policy N8 Assessment Criteria

Criteria	Assessment of the Proposed Development
i. Settlement pattern including street patterns, orientation of buildings and sites, boundaries and density of development;	<p>As discussed in the Historic Environment Assessment Report, the design iterations for the Proposed Development have taken account of the settings of the nearest listed buildings and the layout has allowed for a significant buffer between the solar array development and the following designated assets the Application Site in part forms the setting of:</p> <ul style="list-style-type: none"> • Fulford Conservation Area • Grade II Listed Church of St Nicholas, Fulford; and • Grade II Listed Fulford Hall. <p>Furthermore, the design has taken account of the topography of the Application Site and the Proposed Development infrastructure has been placed at the other side of the hill to the south of the Application Site.</p>

	<p>Additional hedgerow has been included to prevent any potential views from the village of Fulford and therefore from the Fulford Conservation Area.</p> <p>In addition to this, the non-designated asset of Lower Gorsty Birch has part of its setting within the northern fields of the Application Site. Nonetheless, most of the Application Site lacks any intervisibility with Lower Gorsty Birch, as a result of the intervening mature vegetation and topography alongside the modern farm buildings situated between the historic building and the Application Site.</p>
ii. <i>The scale, form and massing of buildings and structures;</i>	Detailed constraints mapping took place during the design period of the Proposed Development which took in to account any potential buffers that would need to be implemented at the Application Site. From this careful mapping, the scale, form and massing of the Proposed Development is such that it would not have a detrimental impact on any heritage assets and their settings due to the vegetation and topography on site.
iii. <i>Materials, including colours and textures;</i>	The materials and colours of the Proposed Development's infrastructure are subject to detailed design but will not have a detrimental impact on the heritage assets within the vicinity of the Application Site Boundary or their settings.
iv. <i>Significant landscape features including open spaces, trees and planted boundaries;</i>	The Proposed Development has utilised the existing topography at the Application Site such as mature hedgerow and trees in order to screen the development from view to road users, nearby residents and users of the PRoW. In addition to this, the LEMP details the proposed tree and hedgerow planting at the Application Site that will be implemented to further screen the Proposed Development from potential views.
v. <i>Significant views and vistas;</i>	As mentioned above, due to the existing mature hedgerow and trees at the site alongside proposed planting of hedgerow and trees, the Proposed Development will largely be screened from view.
vi. <i>Locally distinctive architectural or historical detail;</i>	As discussed in the Historic Environment Assessment Report, the Proposed Development will not have a significant impact on any architectural or historic detail.
vii. <i>The setting of heritage assets;</i>	As concluded from the Historic Environment Assessment Report, the Proposed Development was concluded to not have a significant impact on the setting of nearby heritage assets, with the greatest significance being considered negligible.
viii. <i>Archaeological remains and potential;</i>	The Historic Environment Assessment Report stated that no archaeological remains have been recorded at the site and from the two site visits that took place by the heritage specialist, no assets were identified within the site to add to the baseline data. Furthermore, the Geophysical Survey Report concluded that the

	archaeological potential of the area is assessed as very low and no anomalies of archaeological potential were identified.
ix. <i>Traditional permeable building construction."</i>	This criterion is not applicable to the Proposed Development.

Further to the above, there are a number of listed buildings within a 1km radius of the Application Site Boundary, with the closest listed building situated approximately 400m west of the Proposed Development at its closest.

Data on designated heritage assets was obtained for the Application Site Boundary at a buffer of 2km and data on non-designated heritage assets was obtained for the Application Site Boundary at a buffer of 1km.

A Historic Environment Assessment was undertaken and has been submitted alongside the planning application. This report concluded that there are no designated heritage assets within or adjacent to the site. There are three designated heritage assets with settings that include, in part, the site; Fulford Conservation Area, the Grade II Listed Church of St Nicholas and the Grade II Listed Fulford Hall.

The Application Site forms part of the setting for the Fulford Conservation Area. It is concluded that most of the Application Site lacks any intervisibility with the Conservation Area, as a result of the intervening mature vegetation and topography. Where views between the Conservation Area and Site are available, they are filtered by trees and hedgerows and buffered by the intervening fields. Therefore, the predicted effect of the Proposed Development on the Conservation Area is negligible.

The Grade II Listed Church of St Nicholas, Fulford is another of the designated heritage assets mentioned above. The more immediate setting of the adjacent churchyard and fields most strongly contribute to the asset's heritage values, the Application Site is at the periphery of this setting. The majority of the Application Site lacks any intervisibility with the church, as a result of the intervening mature vegetation and topography. Where views between the church and Application Site are available, they are filtered by trees and hedgerows and buffered by the intervening fields. The ability to appreciate the rural context of the church will be preserved and the contribution made by setting to its heritage values unaltered. Therefore, given the lack of intervisibility and that the key aspects of setting that contribute to the heritage values of the asset are unaltered, the effect is none.

Furthermore, the Grade II Listed Fulford Hall designated heritage asset has the potential for the Application Site to impact it's setting. Most of the Site lacks any intervisibility with Fulford Hall, as a result of the intervening mature vegetation and topography, and also the large modern farm buildings situated between the listed building and the Site. The ability to appreciate the rural context of Fulford Hall and its relationship with the working farm in which it is experienced will be largely preserved and the contribution made by setting to its heritage values largely unaltered. Therefore, the predicted effect of the Proposed Development on the setting of this heritage asset is negligible.

In addition to the above-mentioned designated heritage assets with settings that include, in part, the site, there are several non-designated heritage assets within a 1km buffer of the Application Site Boundary as discussed below.

The parish boundary between Stallington and Fulford, evident on historic mapping and through the geophysical survey data and aerial images follows field boundaries and crosses Field 6. It is an asset of low heritage value. The impact on this asset would be low, given the scale of ground works necessary for the Proposed Development. Therefore, a negligible impact is predicted.

A ridge and furrow recorded by Historic Environment Records (HER) in Field 7 was not evident in a walkover survey or geophysical survey and is an asset of negligible value. Therefore, the impact on this asset is none. Furthermore, there is possible ridge and furrow in Field 18, detected by the geophysical survey. This is an asset of low heritage value. The impact on this asset would be low, given the scale of ground works necessary for the Proposed Development therefore a negligible impact is predicted.

Additionally, a number of former field boundaries are documented within the site by historic mapping, and aerial images which were also identified by the geophysical survey. These are assets of at most low heritage value. The impact on these assets would be negligible, given the scale of ground works necessary for the Proposed Development. A negligible impact is therefore predicted.

The non-designated Lower Gorsty Birch is approximately 250m to the northwest of the Application Site. The northern fields of the Application Site forms part of this setting, however, not all of the asset’s setting includes the Application Site. Most of the Application 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 Application Site. The ability to appreciate the rural context of Lower Girsty Birch would be largely preserved and the contribution made by setting to its heritage values largely unaltered. Therefore, the predicted effect is negligible.

The results of the desk-based assessment and field surveys undertaken indicate a low potential for archology within the Application Site boundary and the Proposed Development will have relatively limited below ground impacts.

Overall, the historic landscape character of the site is retained within the layout of the Proposed Development, with hedgerows retained throughout the Site. The ponds which may be evidence of former quarrying activity are either outside of the Application Site Boundary or retained within the layout.

Therefore, this proposal accords with Policy N9: Historic Environment, NPPF: Section 16: Conserving and Enhancing the Historic Environment and NPPG: Historic Environment.

6.11 Transport

Policy T1: Transport focuses on delivering sustainable transport systems across the Stafford Borough in line with Spatial Principle SP1 and Spatial Principle SP3. The assessment criterion that developments should follow regarding transport is detailed in Table 6.11 below.

Table 6.11: Policy T1 Assessment Criteria

Criteria	Assessment of the Proposed Development
a. Reducing the need to travel by private car in urban areas by ensuring that, wherever possible, new development is located close to access points (bus stops, railway stations, and park and ride facilities) along public transport corridors;	This assessment criterion is not applicable to the Proposed Development.
b. Requiring new developments to produce Transport Assessments and Travel Plans, where appropriate, including maximising the use of public transport, as well as facilitating the provision of safe and well-integrated off-street parking;	<p>A Transport Statement (TS) has been prepared and submitted to accompany the planning application. The TS evaluates the existing transport infrastructure in the vicinity of the Application Site and identifies the key transportation impacts that may occur during the construction and operational phases of the Proposed Development.</p> <p>The main transport impacts will occur during the construction phase. Once operational, the Proposed Development would generate a very small number of vehicle trips.</p> <p>Due to the semi-rural location of the site, there are no walking or cycling facilities and very limited public transport services within the vicinity that could serve the development. However, construction personnel will be encouraged to carpool, or to travel to site in minibuses.</p>

	<p>There will be no permanent staff based at the site once operational so the lack of access by sustainable transport modes is not seen as a barrier to development of the site.</p>
<p>c. Working with the Local Highway Authority, the Highways Agency and, where appropriate, developers to improve road safety;</p>	<p>As concluded from the Transport Statement, the junction proposed for vehicular access at the Proposed Development is considered to be sufficient for providing access for the maximum legal articulated vehicles to the Proposed Development. Saverley Green Road is subject to a 60mph speed restriction and any DMRB compliant junction would subsequently require visibility splays of 215m in each direction. Speed surveys undertaken during October 2023 at the proposed access location determined that the 85th percentile speeds are 45.7mph and 46.2mph in the east- and west-bound direction, respectively. As such, a reduced visibility splay of 160m is applicable for a design speed of 50mph, adhering to road safety at the access point.</p> <p>Alongside this, a Framework Construction Stage Traffic Management Plan (CTMP) has been included as a chapter within the TS which sets out the measures needed to be put in place in order for traffic impacts to be minimised, in turn improving road safety at the construction access point.</p>
<p>d. Encouraging walking and cycling, through links to existing routes, and the provision of facilities such as secure, accessible and sheltered bicycle parking with changing facilities on site. prospective developers should assess the transport impact of new development in accordance with 'Guidance on Transport Assessment' (DfT/CLG, 2007) and any subsequent revisions. Consideration of the impact on the Highways Agency Strategic Road Network (SRN) should be in accordance with national policy;</p>	<p>Two Public Rights of Way (PRoW) routes are located within the Application Site Boundary (Fulford 12 and Fulford 15, both of which are Category C footpaths). During construction, the PRoWs will remain open at all times, with priority given to the users of the PRoWs. There will be banksmen where the PRoWs are crossed by the access track to supervise any manoeuvres.</p> <p>Therefore, the Proposed Development encourages walking and cycling at the existing PRoWs.</p>
<p>e. Provision for lorry parking facilities on the road network, together with adequate space for off-street manoeuvring, loading and unloading;</p>	<p>There will be provision for parking at the construction compounds in the Application Site boundary for necessary construction vehicles and any maintenance vehicles during the operational period of the Proposed Development.</p>
<p>f. Reducing the need to travel through providing a balanced mix of land uses, retention of local services, and encouraging the use of Information & Communication Technology;</p>	<p>This criterion is not relevant to the Proposed Development.</p>
<p>g. Seeking to reduce the impact of traffic from new development on the road networks by</p>	<p>As concluded from the Transport Statement, the local road network is considered capable of</p>

<p>ensuring that the generation of traffic is minimised through sustainable transport measures. Ensuring that all developments that generate significant traffic flows, including commercial traffic must be located in close proximity to the primary road network, do not have negative impact on the network or at junctions, air quality, and nearby communities, and should have adequate capacity to accommodate the development or can be improved or mitigated as part of the development;</p>	<p>accommodating the temporary construction traffic to the Application Site.</p> <p>The majority of construction traffic is expected to arrive from the strategic road network via the A50. Traffic will then take Uttoxeter Road east from the Tean Roundabout. After approximately 1.8km vehicles will take the right-hand turn into Cresswell Lane. Vehicles will then travel along Cresswell Lane for approximately 2km, taking caution around the level crossing. Traffic will then take the right-hand turn into Saverley Green Road before travelling approximately 1.1km to the proposed site access.</p> <p>As previously discussed, the local road network is considered to be sufficient for providing access for the maximum legal articulated vehicles to the Proposed Development and can accommodate the Proposed Development without significant detriment to existing road users or local residents.</p>
<p>h. Proposals that generate significant levels of traffic, which cannot be accommodated in terms of capacity, road safety and load, will not be permitted.</p>	<p>As concluded from the Transport Statement, the Proposed Development is not anticipated to generate significant levels of traffic.</p>

Therefore, the Proposed Development complies with the provisions of Policy T1: Transport.

Section 7.0: Need for the Proposed Development

7.1 Climate Change

As set out in Section 5.3, it is evident that Climate Change is the greatest challenge facing our society. Planning plays a key role in contributing to both mitigation and adaptation to climate change, through decision making on the location, scale and character of development⁴⁷. This is further emphasised within paragraph 8 of the NPPF, which makes it clear that ‘mitigating and adapting to climate change’ is a core planning objective.

In May 2019, the UK Parliament passed a non-binding motion declaring a climate emergency. The definition of which is “a situation in which urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it.”⁴⁸ Both Stafford Borough Council (SBC) and Staffordshire County Council (SCC) declared a climate emergency in July 2019. As discussed in Section 5.3.1, SBC have published a Climate Change and Green Recovery Strategy 2020-2040 detailing the importance of renewable energy infrastructure when considering ways to limit the effects of climate change. The strategy emphasises that the new Local Plan that is currently being prepared will continue to encourage renewable energy production throughout the Stafford Borough.

Furthermore, as previously discussed in Section 5.4.2, SCC published a Climate Change Action Plan 2021-2025 detailing the actions required to reduce carbon emissions. Alongside this plan, SCC have also published a Climate Change Strategic Development Framework Which sets out the five delivery themes that will ensure the Council’s vision of achieving net zero emissions by 2050 is reached. Within this strategic development framework, the increased utilisation of renewable energy is noted as one of the priorities to address in order to reduce carbon footprint.

In response to the Climate Change Committee ‘Net Zero Technical Report’⁴⁹ the Climate Change Act 2008 (2050 Target Amendment) Order came into force in 27th June 2019. This amended the previous legally binding target to reduce UK greenhouse gas emissions from 80% to 100% by 2050, based upon 1990 levels.

As a whole, the Proposed Development would make a significant contribution towards these targets. It will have a maximum generation capacity of 30MW which has the potential to power up to 8,000 UK homes⁵⁰ with a carbon offset of approximately 16,900 tonnes/year⁵¹.

7.2 Low Carbon Energy Generation

Increasing the amount of energy produced from renewable and low carbon technologies will reduce the dependence on the conventional use of fossil fuels. It will also help to make sure the UK has a secure energy supply and reduce greenhouse gas emissions which will slow down climate change, a key Government priority.

The Energy White Paper: Powering our Net Zero Future⁵² was published in December 2020. The White Paper states that the UK energy system is still largely dominated by the use of fossil fuels, which will need

⁴⁷ Town and Country Planning Association & RTPI (2023): The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change. Available Online: [The Climate Crisis \(rtpi.org.uk\)](https://www.rtpi.org.uk/the-climate-crisis/)

⁴⁸ Oxford Learner’s Dictionaries: Climate Emergency Definition. Available Online: [climate-emergency noun - Definition, pictures, pronunciation and usage notes | Oxford Advanced Learner's Dictionary at OxfordLearnersDictionaries.com](https://www.oxfordlearnersdictionaries.com/definition/oxford/urgent-action-is-required-to-reduce-or-halt-climate-change-and-avoid-potentially-irreversible-environmental-damage-resulting-from-it)

⁴⁹ Climate Change Committee (2019) Net Zero Technical Report. Available Online: [Net Zero - Technical Report - Climate Change Committee \(theccc.org.uk\)](https://www.theccc.org.uk/reports/net-zero-technical-report/)

⁵⁰ The homes equivalent figure has been calculated by taking the predicted annual electricity generation of the site (based on RES assessments Leaford has a predicted capacity factor of 11.2% and dividing this by the annual average electricity figures from the Department for Business, Energy & Industrial Strategy (BEIS) showing that the annual UK average domestic household consumption is 3,509 kWh (December 2022).

⁵¹ The Carbon offset calculation is 39.9GWh (average annual yield over 40 years) x 424 = 16,900 tonnes/year. RES uses DESNZ’s “all non-renewable fuels” emissions statistic of 424 tonnes of carbon dioxide per GWh of electricity supplied in the Digest of UK Energy Statistics (July 2023) Table 5.14 (“Estimated carbon dioxide emissions from electricity supplied”). Carbon reduction is calculated by multiplying the total amount of electricity generated by the solar farm per year by the number of tonnes of carbon which fossil fuels would have produced to generate the same amount of electricity).

⁵² HM Government (2020) The Energy White Paper: Powering our Net Zero Future. Available online: [Energy White Paper \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901117/energy-white-paper.pdf)

to change dramatically by 2050 if the net zero target is to be achieved. Decarbonising the energy system over the next thirty years means replacing - as far as it is possible to do so - fossil fuels with clean energy technologies such as renewables. The UK Government are not planning for any specific technology solution; however, the future generation mix will comprise a low-cost, net zero consistent system, likely to be composed predominantly of wind and solar, alongside complementary technologies such as battery storage. The White Paper states *“we will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet net zero emissions in all demand scenarios.”*

Furthermore, the Powering Britain Report, published in 2023, emphasises the need for more solar developments in the UK in order to address energy security and grasp economic opportunities, stating that *“solar has huge potential to help us decarbonise the power sector. We have ambitions for a fivefold increase in solar by 2035, up to 70GW, enough to power around 20 million homes. We need to maximise deployment of both ground and rooftop solar to achieve our overall target. Ground-mount solar is one of the cheapest forms of electricity generation and is readily deployable at scale. Government seeks large-scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low/medium grade agricultural land.”*

7.3 Energy Security

The British Energy Security Strategy⁵³ was published in April 2022 to address energy security across the UK, highlighting our vulnerability to international oil and gas prices and identifying the need to reduce dependence on imported oil and gas. As set out within the Strategy, increasing the proportion of electricity generated from renewable sources, reduces the exposure of the UK to volatile fuel markets. The strategy identifies the need to be bolder in the *“removing of red tape that holds back new clean energy developments and exploit the potential of all renewable technologies.”*

In relation to solar, the strategy identifies that there is currently circa 14GW of solar capacity in the UK, split across various scales of development, ranging from large scale to smaller scale roof-mounted solar. It is expected that solar development will increase five-fold by 2035, which would result in the need for an additional 70GW of solar generation to be built across the UK to help us get to Net Zero.

In order to increase the deployment of solar across the UK, the strategy seeks to consult on *“amending planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place. We will continue supporting the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites.”*

Of particular importance to the Proposed Development is the support for the co-location of solar alongside other functions, including storage.

7.4 Biodiversity Net Gain

A Biodiversity Net Gain (BNG) Report was undertaken at the Application Site. This report discusses that the Proposed Development plan focuses on enhancing the existing habitats underneath and around the solar panels. Alongside this, hedgerow creation, enhancement and the planting of trees within existing hedgerows is recommended throughout the site. The hedgerow enhancement predominately focuses on hedgerows considered to be in a poor condition due to consistent gaps or a lack of mature trees.

The Proposed Development will create approximately 1.4km of hedge, enhance 0.98km of hedge and plant trees within 0.96km of hedge. This therefore results in a BNG increase of 74.2% for habitat units and a BNG increase of 22.04% for hedgerow units at the Application Site, both of which are above the 10% threshold set out by the 2021 Environment Act, which is to be made a requirement from January 2024.

⁵³ HM Government (2022) British Energy Security Strategy. Available online: [British Energy Security Strategy \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106422/bes-2022.pdf)

7.5 Legacy

The Proposed Development will provide a stable and diversified source of revenue over a sustained period while improving the ecological value of the site and safeguarding its reuse for agriculture in future.

Where possible, the Proposed Development retains and enhances existing landscape features, particularly the surrounding hedgerow field boundaries. Additionally, the Proposed Development will leave a positive legacy in the form of improved biodiversity and landscape value thanks to additional planting and infilling of hedgerows following the construction phase. Alongside this, the ecological enhancement measures detailed in the LEMP highlight areas for proposed enhanced grassland, proposed wildflower seed mix, native species trees and hedgerow maintained to 3.5m. These ecological and landscape enhancement measures are a benefit to be afforded further weight in favour of granting planning permission.

Following decommissioning, the site can be returned to agricultural use with the benefit of retaining the enhanced landscape and biodiversity value from the matured mitigation planting.

7.6 Socio Economic

Paragraph 82 of the NPPF states that the Government is committed to ensuring that the planning system does everything it can do to support sustainable economic growth. Paragraph 84 of the NPPF is also supportive of economic growth in rural areas and as part of this states that local plans should promote the development and diversification of agricultural and other land-based rural businesses.

The Proposed Development would contribute to the diversification of the current function of the farms at the Application Site, increasing their profitability as farming businesses and ultimately providing more economic security to the landowners than the existing agricultural activities. This support for “*ongoing viability and stability of a rural business*” was considered an important determining factor in an appeal decision for a 10MW solar farm development on land at Rowles Farm, Bletchington which is situated within the Oxfordshire Green Belt (appeal ref. APP/C3105/A/13/2207532)⁵⁴.

Furthermore, the Proposed Development would allow the site to remain in agricultural use with enough land beneath and between the arrays to remain accessible for livestock purposes such as sheep grazing. There is also potential to support economic growth from the Proposed Development through the creation of jobs associated with the ongoing maintenance onsite at the solar farm, as well as a number of other indirect jobs associated with the construction and decommissioning of the Proposed Development.

⁵⁴ UK Government: The Planning Inspectorate: Appeal Decision (Appeal Ref: APP/C3105/A/13/2207532). Available online: [Microsoft Word - mimeattach.bin \(hertsmere.gov.uk\)](#)

Section 8.0: Summary and Conclusion

The Application Site lies within the boundary of Stafford Borough Council on land to the northeast of Fulford, Staffordshire.

As can be concluded from the assessment of the Local Development Plan, there is no conflict between the relevant key policies outlined in this plan and the Proposed Development.

As discussed, National Planning Policy has changed considerably since the PSB1 was adopted in 2014 and indeed as has the approach to solar PV developments in the Green Belt. Furthermore, the approach to solar PV developments on agricultural land has changed significantly by way of not only national planning policy and guidance but also in respect of numerous appeal decisions. As can be determined from the Planning Statement, there is no conflict between the Proposed Development and National Planning Policy and Other Material Considerations discussed in Section 5.

There are a number of key points and advantages in favour of the Proposed Development concluded from the Planning Statement which are required to be considered when reaching a decision on this planning application, including:

- The installation of the Proposed Development is to generate a renewable source of electricity, contributing towards the transition to a low carbon economy.
- The installation of battery storage units at the Application Site will allow for electricity to be stored until it is required. Therefore, this can allow excess electricity generated from the solar panels to be used at a later time when these sources are not available.
- The Proposed Development will aid the council in achieving their vision of net zero emissions by 2050 through increasing the utilisation of renewable energy in SCC.
- The Proposed Development will have a maximum generation capacity of 30MW which has the potential to power up to 8,000 UK homes.
- The Proposed Development will contribute to the diversification of the current function of the farms at the Application Site, increasing their profitability as farming businesses and ultimately providing more economic security to the landowners than the existing agricultural activities whilst ensuring viability of the farming businesses for future generations.
- It will allow the site to remain in agricultural use with enough land beneath and between the arrays to remain accessible for livestock purposes such as sheep grazing.
- Has the potential to support economic growth through the creation of jobs associated with the ongoing maintenance onsite at the solar farm, as well as a number of other indirect jobs associated with the construction and decommissioning of the Proposed Development.
- Increased energy security, through the generation of a clean, homegrown, renewable source of electricity.
- Limited likely effects upon the local environment and nearby residential receptors.
- Reversible form of development, allowing the land to be restored to original condition following the operational phase.
- The land comprises 95.68% ALC Grade 3b. The agricultural quality at the Application Site can be enhanced through the continued use of the land under the panels for agriculture.
- Agricultural land will not be lost as a result of construction or operation as the Proposed Development has a very limited and temporary footprint. The Agricultural land quality at the Application Site can be enhanced by resting the land from more traditional intensive farming methods and it is temporary in nature and very easily reversed, unlike traditional brick and mortar developments which form permanent additions to the countryside.
- A BNG of 74.2% for habitat units and 22.04% for hedgerow units can be achieved, both of which are above the soon to be required 10% threshold.
- Landscape enhancement measures proposed includes the implementation of proposed native species trees, proposed grassland and enhanced grassland and proposed native species hedge maintained to 3.5m with the benefit of retaining the enhanced landscape and biodiversity value from the matured mitigation planting remaining after decommissioning.
- The Proposed Development is proposed to create approximately 1.4 km of hedge, enhance approximately 1km of hedge and plant approximately 138 trees within approximately 1km of hedge.
- The Public Rights of Way crossing the Application Site Boundary will remain open and available for use during construction, increasing accessibility at the Application Site.

A number of environmental and technical assessments have been undertaken to support the planning application, none of which have identified any significant adverse effects as a result of the Proposed Development.

As identified throughout this Planning Statement, decisions on planning applications are required to be made in accordance with the provisions of the Local Plan, unless material considerations indicate otherwise. The Proposed Development has been assessed against the relevant policies and guidance contained within the Local Plan. The Proposed Development has been assessed as being in compliance with the provisions of each of these, and no material considerations have been identified which indicate that the Proposed Development should not proceed.

There is significant support for the principle of renewable energy developments and presumption on favour of sustainable development throughout the NPPF. Paragraph 148 of the NPPF is clear that the planning system should support transition to a low carbon future, specifically renewable and low carbon energy and associated infrastructure. Granting planning permission for the proposed solar farm would comply with these requirements and demonstrate support for such schemes. Ultimately, climate change is the biggest threat we as a society face. The Proposed Development would have a significant contribution towards the Climate Change Committee 'Net Zero Technical Report' and the Climate Change Act 2008 (2050 Target Amendment) Order which amended the previous legally binding target to reduce UK greenhouse gas emissions from 80% to 100% by 2050, based upon 1990 levels. It will have a maximum generation capacity of 30MW which has the potential to power up to 8,000 UK homes.

The NPPF also directs that planning applications for renewable development should be approved if impacts are (or can be made) acceptable. As outlined above, the assessments of environmental effects have been shown to be limited and would also accord with the provisions of national policy and the NPPG where these specifically refer to environmental effects. The Proposed Development is deemed to have struck an acceptable balance between renewable energy production and all relevant planning and environmental considerations and, on this basis, we contend that planning permission should be granted.

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