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27 August 2024

Dear Dryden and Vanessa,

Leaford Solar Farm Application - Landscape Comments

Design:Midlands are working with Stafford Borough Council in providing expert landscape input on Leaford Solar Farm application (reference 24/38719/FUL). This has involved Fiona Heron (Landscape architect) undertaking a thorough site visit with Dryden McNair Lewis and Vanessa Blake from Stafford Borough Council officers including a briefing on the site history and local context and undertaking an assessment of the planning application, specifically the Landscape and Visual Impact Assessment (LVIA).

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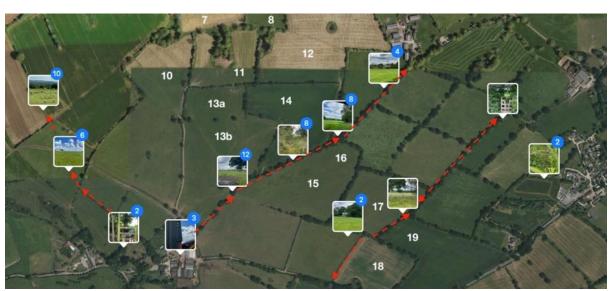


Photo points taken on the site visit July 2024. These are enlarged and referred to in the document.



BACKGROUND

1.1 The Site

The site comprises 69 acres of agricultural grassland in 19 fields which are largely bounded by well-established and mature hedgerows, woodland and trees [part of Littlecroft and Fulford Hall Farm] and is currently used for grazing livestock. The land is gently undulating, south facing ranging from 165 above ordnance datum to 205 in field 11.

Two public rights of way run through the application site. Fulford 12 and Fulford 15. An overhead line runs west-east through field 2 and Field 3 and one crosses 5,6,8 and 9. A50 is to the North. Stallington is to the west, Fulford to the south east and Saverley Green to the east. Saverley Green Road runs adjacent the southern boundary.

1.2 The Proposal

Development consists of solar arrays, with piles [allowing access below for sheep grazing] and battery storage enclosures [BESS]. There is a stand-alone BESS compound and throughout the site battery storage units with concrete footings. Deer fencing is proposed, high tensile steel wire with mammal gates. Security fencing lines the BESS palisade or weld mesh, 2.0-3.0m high lighting and security cameras. There are no changes to topography.

90m of hedgerow will be removed for access. New hedgerows are proposed, and trees within hedgerows. Management of existing hedgerows and infill is proposed

1.3 LVIA

- LVIA recognises the development would result in some long-term alteration to and loss
 of landscape elements for access tracks and associated services at localised points in the
 site.
- The LVIA is comprehensive and well considered however a number of additional viewpoints along the PRoWs within the site or further clarification of elements may be helpful.
- Mitigation is predominantly new hedgerows and tree planting to strengthen and restore historic field boundaries and provide natural screening from key viewpoints.
- A Landscape and Ecology Management Plan has been provided which demonstrates how natural planting supports this approach.



2.0 GENERAL COMMENTS

2.1 Strategic Approach to location of panels & Red Line/Development Boundary

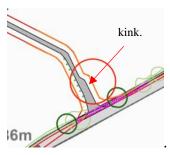
- Hedgerows and existing field patterns generally define locations of panels though there are a number of exceptions primarily related to topography or screening.
- The red line boundary does not always follow the hedgerow lines or field pattern and splits Field 5. The red line boundary at fields 15/16, 17 appears to response to the topography however mitigation indicated in the LEMP for 17 is outside the red line boundary. This presents potential legal problems.

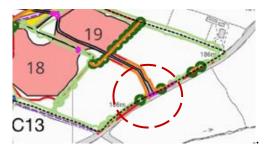
2.2 Easement, Battery, Lighting and Associated Services

- Overhead lines cross the site in a number of fields; fields 5, 6 and 9 and 12 and 14. A set back of 3m and 4.3m has been provided where no solar arrays are proposed. These areas will not be shaded and may result in the long term a variance in wildflower species but otherwise have little impact on users or from viewpoints.
- Permanent lighting is be kept to a minimum and those for maintenance manually controlled.
- The area of hardstanding in field 4 appears expansive filling the field. The Initial Preliminary Layout drawing indicated the location was on the lower slopes and this needs clarifying.

2.3 Vehicular Access from Saverley Green Road LVIA Viewpoint 2

- Localised sections of hedgerow or planting will be removed for a 4m wide access track.
- Vehicular access is provided from Saverley Green Road with a resulting large visibility splay of 160m and 46m of hedgerow will need to be trimmed to 1.05m high.
- The access track between 18 and 19 bends to avoid tree loss on Saverley Green Road.
- The reduction of the width and how this point is treated however is unnatural, manmade and unsympathetic to the context.
- The double hedgerow at the entrance (view 2c below) is not characteristic of the area.
 This new planting/ hedgerow will be permanent so will need sensitive landscape treatment.
- The approach here will have a negative impact on the character and nature on of the road which is currently lined on both sides by verges and a well maintained hedgerow.
- The approach here needs further consideration.





Proposed hedge bend & narrowing

Broader context and planting at Saverley Green Road.

• The photographic montages below [View 2 from the LVIA] show that panels 18 1nd 19 are not likely to be visible from the road and there is additional planting on the border of 19.



LVIA View 2a currently from Saverley Green Road towards field 19



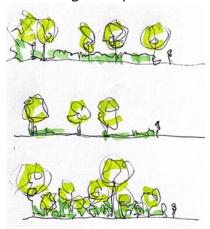
View 2c from road towards field 19 after 15 years showing double hedgerow

2.4 Screening and Mitigation

- Native hedgerow and tree planting have been introduced provide natural screening from key viewpoints.
- Screening is provided by new hedgerows, infill and trees in lines or groups which
 generally responds to field patterns and sit comfortably with the character of the area
 responding to specific areas of the site. There are a number of areas which seem
 uncharacteristic or may need clarification. [see below]
- Existing characteristics of hedgerows differ throughout the site, from more natural to well managed. Those to the north of the site have been identified as heavily flailed. The



detailed approach to tree planting and management of new hedges will be crucial as to how hedgerows provide screening yet sit naturally with their neighbours.



These simple images demonstrate some of the differing landscape characters of the hedgerows in the area and how approach to mitigation may not always be tall planting or total infill of trees.

3.0 CHARACTER AND FEATURES OF THE LAND

3.1 Water and Ditches

- Field ditches occur, often bordering hedgerows. These are not identified as species rich. The waterbodies also provide terrestrial habitats which have value as movement and foraging corridors. They are to be retained. Streams/water and crossings courses do contribute to the character of the area.
- The site is linked to the river Blythe by the open burn less than 1m deep to the north running west—east, with steep sides and little cover. This is indicated in Field 3 where panels are set back so a buffer has been retained along the ditch edge.
- The PRoW between 14 and 15 and 16 lines a watercourse and is waterlogged, inaccessible and we were unable to use it on the site visit. (See info in PRoW section later). It is unclear how use of this route will be improved and access resolved. It is important that this is addressed as part of the development.





PRoW between 14 and 15 and 16

Bridge on PRoW C12

There are a number of areas where water collects preventing walkers or deterring use
of the public rights of way. This is this is particularly apparent at Fulford Hall which
though outside the boundary should be recognised as a barrier to improving access to
the countryside.



Waterlogged public footpath from Fulford Hall outside red line



Unclear signage at Fulford Hall



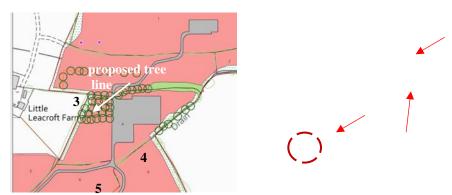
3.2 The Land

- The land is grade agricultural, approx. 96% grade 3b with only 4% grade 3a, the best and 'most versatile' in Field 9 and Field 12. Modified grassland was the dominant habitat, invariably species poor and dominated by perennial and annual rye grass. Grasslands are of limited ecological value due to repeated application of fertilizers and extensive grazing. The approach has been to enhance these (see BNG).
- Proposed grassland surrounds existing features and ponds.
- Buffers are provided to woods, edges and ditches.

3.3 Trees

Trees are proposed generally within hedgerows and field boundaries which provide value for both screening and biodiversity as well as reinforcing field patterns.

- Trees have been planted along the western edge to support screening [fields 5,7&10].
- Smaller trees are often sporadic within hedgerows and not in continuous lines so how new trees and infill are introduced and maintained and the rational or how they tie in with the landscape character strategy will need careful justification.
- A proposed line of native trees in Field 3 seems out character not responding to historic field patterns and the logic, approach, positioning and rational is unclear apart from screening. These need justification.



Line of trees in F3 & proposed tree screening



Current hedgerows, stream, path and solitary tree with new hedgerow from Little Leacroft farm

• The is a logic to infilling/adding trees and extending existing east-west hedgerow between 3 and 4 towards Little Leacroft Farm.



Stream, solar with hardstanding in field 4 and visibility of panels from the farm in field 5

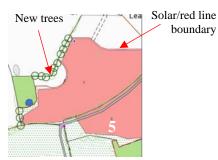
3.4 Boundaries, Hedgerows and Field patterns

Boundaries are generally well-maintained hedgerows with dense mature trees typically restricted to hedgerows. Hedgerows are generally consistent. Most of the hedgerows to the north of the site have been identified as heavily flailed whereas to the south many are uncut.

 There are areas in the ecology management plans where it is indicated in an orange line that "Proposed native Hedge species are maintained to greater than 3.5m". These are often outside the boundary and in some instances it is not clear that these hedgerows exist for example on the southern boundary of field 15



- Field patterns have been shown on a variety of the documents and understood. Plans showing historic field patterns and boundaries, hedgerows or drainage ditches have not been included and are often helpful to inform difficult approach planting.
- Field boundaries will be generally be strengthened which will help towards restoring characteristic features of the landscape.
- Introducing hedgerow trees on its western boundary will contribute towards screening. Existing planting in 7 and 8 will help screen and is supported by additional planting.
- We were not able to access this part of the site but the panels in field 5 will be clearly seen from the farm. It is unclear what has determined this line of solar panels and red line panels on this Northern boundary.
- The boundaries between 6 and 8 and 6 and 9 seem to reference the ditches however it is unclear whether how much the existing trees/hedgerows have been reinforced.





Field 5 & 6 Additional trees help screen from the west

Fields 6,8, & 9

4.0 ECOLOGY, BIODIVERSITY AND MANAGEMENT

- Proposed enhancements, suggested in the ecological report and indicated on the plans, if carried out will improve the sites ecological value.
- BNG calculations show and increase above 10%.
- The approach to planting and management of hedgerows and trees has been identified in the LEMP and well considered. Approach must ensure they continue not only as valuable habitats and wildlife corridors but also contribute to the landscape character and local boundary characteristics.
- The approach has focused on enhancing modified grassland habitats to those of other neutral grassland habitats as this is realistic long term.
- The establishment of a wildflower meadow would be dependent on depletion of nutrients over time and shading would impact flower diversity so a full enhancement of these habitats under the solar panels to lowland meadow has been identified as unlikely.
- It has been identified that additional future management will be required which will increase the ecological value of the grasslands in the long term. A number of options,



from light grazing, cutting, complete removal of grass cuttings or further application in the future have highlighted the importance of a commitment to annual management.

5. PUBLIC RIGHTS OF WAY

The following section relates primarily to the Public Rights of Way. [See plan for reference numbers in Appendix 2b]. The images and notes below are information and images gained from the site visit or provided within the LVIA and raise a number of points which may need developing or clarification.

- Planting of new hedgerows and trees and approach to the landscape seems to be generally well considered.
- Native hedgerow planting is introduced as mitigation and enhancement
- Panels are set back 7.5m from the PRoWs which cross the site C12 and C15 and nature and open / more closed character discussed in the appropriate section below.

5.1 Public Rights of Way to the west C1, C4, C2, C3, C10

• The LVIA recognises there are some long some long views to the north and Blythe Valley and that the development will be largely screened by woodlands except at points where there are elevated views. Whilst The LVIA suggests significant effects are not considered to occur and are identified as moderate. South facing solar panels will be more visible heading north but less when walking south. Over time it is suggested trees and hedges would help screen views but the development would remain visible.

C3 - Walk Northwards from St Nicholas' Church Fulford towards Stallington

- This is long-distance route through the churchyard, with a visible style leading to the more open countryside beyond. The land rises directly to face the horizon interrupted at points by hedgerow and trees. To the west are clear views of gently undulating open countryside with characteristic hedgerows (sometimes gappy) and groups of trees and to the east similar open ground with the rising hill obscuring any view of the site.
- No sign of the sight will be visible from this point until the top of the ridge is reached prior to the next style.



1st Style at church boundary



View to west beyond the style and churchyard hedgerow



View on C3 towards horizon following PRoW with 2 distinct 'navigational' trees and style

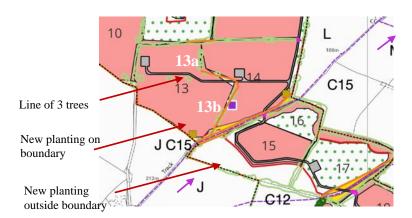
- A dramatic and clear panorama over the distant countryside is revealed at the apex of the site with far reaching views to the north and east. See below. A number of the fields will be apparent. 1,4, & 9 and Home Farm are in view in the distance.
- This viewpoint has not been supplied in the LVIA and should be provided with an assessment of the mitigation or impact from here.
- This extensive view of the horizon and distant features and villages provides a valuable experience for the user aiding with navigation and placing them within a broader context of the County and landscape.
- It is worth noting that this view is revealed through open fields or gaps in the hedgerows which are outside the site boundary. Clarification of which were remnant, which were originally open and a vision for the future hedgerow management may help support the approach to these views.



Distant View at apex looking North-East from elevated section of the PRoW

5.2 PUBLIC RIGHTS OF WAY C15 between Fulford and Saverley Green

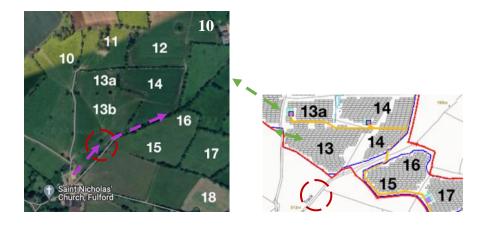
Where the Prow C15 runs through the site the solar array will be close to the route. This will be seen intermittently and partially screened.



- Panels are set back in field 15 and 17 to reduce impact There are areas in the LEMP where it is indicated in an orange line that "Proposed native hedge species are maintained to greater than 3.5m". Some are outside the boundary, eg. the hedgerow south of field 15 so it is unclear how this will be achieved.
- Whilst 3.5m tall hedgerows may screen, the nature of the surrounding and on site
 hedgerows are not always high. They are often of varied and interrupted by trees. It
 would be helpful to explain the nature of the differing characteristics and how this 3.5m
 or new planting sits or links with its neighbours and whether this approach to hedgerow
 management reinforces the immediate and current landscape character.
- Field 13 is a large open field and the panels are set back so not visible on the initial part
 of the route due to the falling nature topography moving north-east from Fulford. The
 LEMP, indicates proposed native species greater than 3.5m will be planted" following
 the contours. Further clarification of this rational for this orientation and how the line
 fits within field patterns or is determined would be helpful.
- There are a number of isolated trees outside the site to the south of the boundary of 13. There are also 3 existing mature trees on site which separate what is indicated as 13a



and 13b. Whether these were part of a remnant hedgerow and could contribute to screening could be considered and also the impact of planting in 13b and whether there should be panels here.



Outside the boundary on C15 leaving the farm walking North west, along PRoW 15 the development will be screened due to the rising topography. This route continues to a gate where views are provided in the LVIA -1 (see later)



PRow15 from the farm walking north west towards brow site entrance (F13&15)

Below are open views to the north towards field 13 where panels have been set back on the lower reaches and a new boundary hedge proposed. Any hedgerow planting along the route here and to the east appears outside the boundary. It appears that field 15 would be visible and glimpses of the panels.





PRow15 towards entrance to site F13 at brow of hill. Hedgerow planting here will be outside the site boundary

- Heading towards Fulford, hedgerow planting following the line of the PROw is proposed.
- The landscape approach to this route between 13 and 15 will become more enclosed
 for walker. This does have a clear logic both supporting screening and creating a 'green
 sunken route' and a continuity of the characteristics of this immediate area of the site.
 There are large trees along this boundary and the proposal provides an opportunity for
 a rich experience for the users of the site.



LVIA Viewpoint 1 demonstrates a number of views and montages between Fulford and the site. LVIA assessed intermittent visibility, glimpses of the southern parts especially 13 and 15 and high sensitivity with visibility of the outer edges of solar panels but not significant as it will be screened by growth of trees and hedges over time.





LVIA View 1c montage

LVIA View 1e



LVIA View 1f after hedgerow IS established



LVIA View 1b from gate



LVIA View 1d montage from gate



From the site visit





PRoW & entrance to site from route walked between PRoW looking back towards Fulford Hall/Farm. It appears planting along 13 & 15 where additional planting is proposed clarification of views would be helpful

the route would screen any panels.

The route of the path between the hedgerows of 14 and 15 and is not visible, is boggy, inaccessible and lined by a steep watercourse The panels will be close to the route and whilst the proposals indicate screening It is unclear from the plans how navigation and access will be resolved. The approach to this footpath enhancements and impact of the panels will therefore need exploration and further clarification.



Images showing steep watercourse and lack of indication of the PRoW demonstrating access issues from field 15

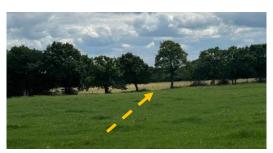




View looking back South west on PRoW towards ridge from field 15



Location of images PRoW [route diversion]



Proposed infill hedgerow on boundary of 16 from field 15 east of



Exit style at field 14



Field 1 in the distance and 12 in the foreground from PRoW

The PRoW [C15] exists through a style at the boundary of the site revealing open fields and open views to the distant countryside. Field 1 appears to be visible in the distance as does Field 12. See below. Appropriate infilling of the boundary hedge will support mitigation. There may be glimpses of 9. The PRoW continues to the farm.



Field 17 will not be visible from here

5.3 PUBLIC RIGHTS OF WAY C12 From Saverley Green

- Prow C12 from Saverley Green leading to field17 is not well signposted and involves
 crossing the lawned garden of a residential property. From here it is very much
 overgrown, not navigable and unsurprisingly seems little used. Whilst outside the
 boundary again a coordinated approach to how the public rights of way are managed
 and maintained needs consideration within a broader picture.
- There is a bridge linking the PRoW across the water courses still outside the site.
 Opportunities arise to explore how character of the path could be developed elsewhere where water is an issue.







Overgrown path and bridge both outside boundary

The PRoW currently runs within the field as indicated in the photo below. Solar panels are proposed in this field and suggested mitigation is a new hedgerow in field 17 and meadow planting.

The approach here would increase the sense of enclosure and would not be in keeping
with the adjoining hedgerows which are single in nature. A double hedgerow here is not
considered appropriate here or sit naturally within the immediate context.



- On entering from Saverley Green, panels would be in the direct line of view then continuing sideways through the field whilst not in the general line of movement they are would certainly be perceived by walkers.
- Not introducing panels in field 17 will retain the open nature of the link between Fulford and Saverley Green. This will allow a route where that development does not split the open nature of the landscape between the east and west.
- It is suggested that the solar panels and BESS are removed from field 17.



Entrance/ Exit point from within field 17 to the east and footpath route



Open nature of hedgerow on border in field 17 between 17 & 19 looking south west .

5.4 Route C13 From Fulford to Saverley Green Road south of site

The nearest point is along boundary of F18 where panels will be visible through hedge though not in the line of direction of the walkers but not are identified in the LVIA as prominent due to the set back. It is assumed over time the hedgerow would contribute to screening. LVIA regards this as negligible.



OTHER VIEWS and other PROWS - NOTES AND VIEWS ASSESSED IN THE LVIA

This report has focussed on the public rights of way. A number of views are assessed in the LVIA see p101 LVIA Viewpoints. and some of them included in the Appendix 3 for information. Many of these are glimpses or distant views from public rights of way or gates. There are also views from residential properties including those from the northern part of the site - Gorsty Birch, Lower Gorsty Birch and R6.

6. SUMMARY OF LANDSCAPE COMMENTS

Generally A well considered approach to the landscape. Number of key areas need consideration.

6.1 Red Line

Hedgerows and existing field patterns generally define locations of panels though there are a number of exceptions.

- The red line boundary does not follow the hedgerow lines or field patterns and splits Field 5.
- The red line boundary at fields 15/16, 17 appears to response to the topography however mitigation indicated in the LEMP for 17 is outside the red line boundary. This presents potential legal problems.

6.2 Vehicular Access

- Treatment to the vehicular access point along Saverley Green Road is currently out of character with the surrounding context. Whilst it is understood that a large splay may be required and the hedgerow needs to be trimmed, the approach to planting of double hedges here is uncharacteristic and out of character with the area.
- This will have a negative impact on the character and nature on of the road which is currently lined on both sides by verges, single well-maintained hedgerows.
- The approach here needs further consideration.

6.3 Ecological Diversity and net gain

 Proposed enhancements, if carried out will improve the sites ecological value and achieve a 10% net gain

6.4 Public Rights of Way - Navigation, accessibility and use

- More views from the public rights of way particularly through the site would be helpful and the user experience clarified.
- Where the 2 PRoWs C12 and C15 cross the site, walkers will become more enclosed and solar panels will be seen at close quarters though planting partially screens views. This may be more obvious in winter months.



- This development provides an opportunity to improve the public rights of way through the site, particularly where they are currently inaccessible.
- There are a number of areas where the public rights of way are not easy to navigate and are wet, boggy and not well sign posted. Whilst some of these are outside an approach and strategy should be provided as to how the development will or could contribute to improving access along the PRoW.
- The PRoW between 14 and 15 and 16 lines a watercourse and is waterlogged, overgrown and inaccessible. Whilst planting lining this provides some screening, is appropriate in nature and extends the character of the lane and it is unclear how access and use of this route will be improved. This needs resolving.

6.5 Mitigation

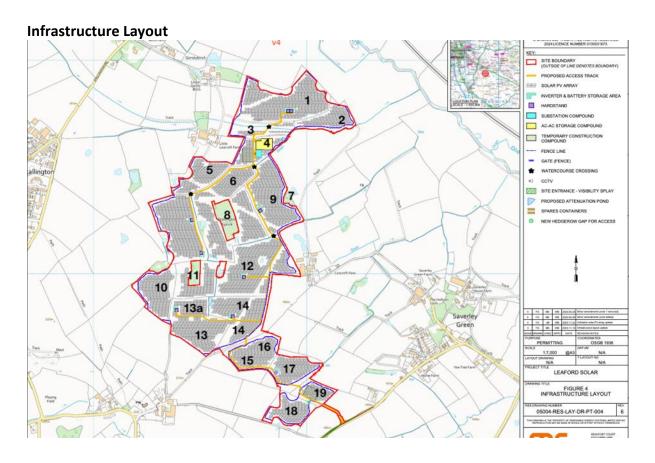
- Field 17 is open in nature. The PRoW currently runs within the field open field. Solar
 panels are proposed in this field. Mitigation is a new hedgerow in field 17 and meadow
 planting. This would increase the sense of enclosure and would not be in keeping with
 the adjoining hedgerows which are single in nature. A double hedgerow is not
 considered appropriate here and does not sit naturally within the immediate context.
- Retaining the open nature of this field would provide a green open vista through the site from Fulford to Saverley Green and minimise the impact of the solar panels.
- Removal of the panels and BESS from Field 17 is suggested.

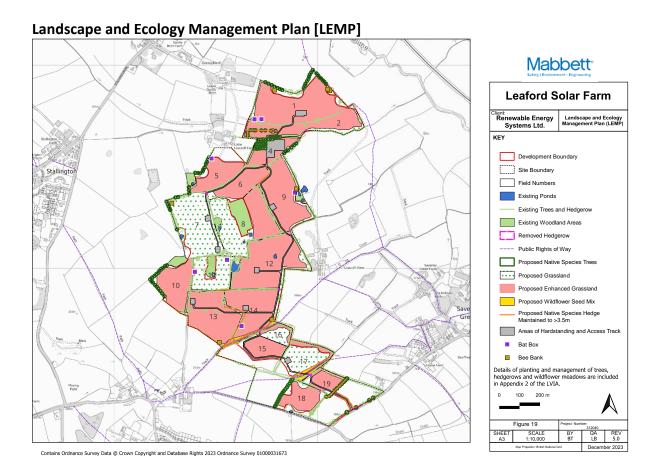
6.6 Hedgerows and Field Boundaries

- Whilst tree planting and new hedge planting does screen and provide biodiversity it may
 be helpful to clarify how these contribute to the character of the area. The nature and
 character of the hedgerows differs throughout the landscape. In some instances lower
 hedgerows with sporadic small trees, other areas taller less managed hedgerows.
 Appropriate approaches to mitigation may not always be planting 3.5m high.
- Field boundaries are generally strengthened, though there are a number of instances where new planting seems uncharacteristic. This includes -
 - A line of proposed trees in Field 3 and a new hedgerow Whilst they may be native they do not seem to respond to any historic field patterns and their logic, orientation, length, positioning and rational is unclear apart from screening.
 - o Entrance hedgerow treatment at the vehicular access
 - Hedgerow and enclosure in field 17



APPENDIX 1



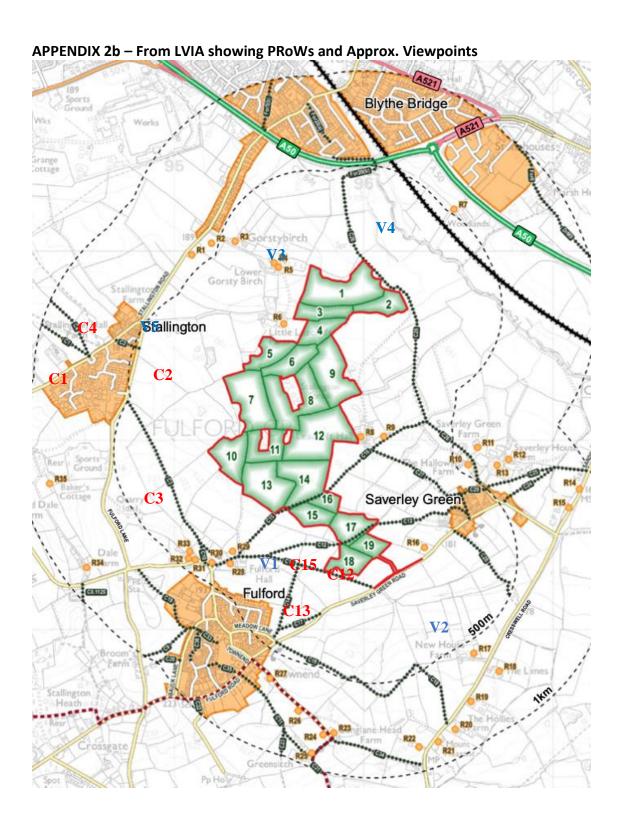




APPENDIX 2a
Google Map showing field patterns









APPENDIX 3 - Information from the LVIA.

Viewpoint 5 - C1, C4, will be largely screened by Stallington.

Viewpoint 5 on **C2** with a montage has been provided below from the gates at Fulford Road where panels are only partially visible behind sweetcorn and current planting. The panels will be south facing.



V5a from Stallington from road to east to fields 1,3,5,7 & photomontage

VIEW 4 - Footpath North of site C25

Visible in the distance as solar panels are on rising slopes



Little Gorsty Birch LVIA Visualisation V4a towards farm looking south



Little Gorsty Birch LVIA Visualisation V4b towards farm looking south



VIEW 7 from North end of Creswell from Road



VIEW 6 FROM SOUTH - PRoW's C11,C18,C23,C31,and C 34

Some views of fields 17-19 will be visible on these routes and south facing panels will be stronger. Likely to be broken up by hedges and trees on site and assessed as moderate-moderate minor



View 6 from Long

Lane near Fulford - south ?R26 looking North from residential near C34 PRoW

SECTIONS WEST OF FULLWOOD – PRoWs C19, C20,C33,C36

Could be views to 13, 15, 7 18 but in they are context of built environment and partially screened. stessed as moderate-minor.

LVA Viewpoint 3 - View from Little Gorsty Birch



Little Gorsty Birch LVIA V3c year 15





Little Gorsty Birch LVIA V3b



Little Gorsty Birch LVIA V3d

The Stone Circles Challenge [from the south]

Stone circles Challenge long distance footpath crosses the development and is well used and there may be distant glimpses from here.

Public footpath north of A50 - For 6 and DR M9

Views to are assessed as not prominent, or significant from path mall area of visibility at central more elevated parts.

Foxfield Steam Railway & Blythe Bridge

Some visibility close to station in northern part of line, trees & hedges screening – negligible and changes in views imperceptible



APPENDIX 4. - Policy and other Relevant Issues to consider

Local Authorities existing or proposed policies will need to be re-examined to face future challenges. As increasing numbers of these schemes come forward planning will have to have to address the long term implications and impacts on other issues such as food resources, health and wellbeing. The variety of approaches to sustainable energy supply and storage, efficiency, value and nature of locations will need careful interrogation and consideration.

- Future of cumulative impacts and precedents
- Rational and justification for sites
- Complimentary approaches to sustainable energy
- Policy preferences for sites and locations, rural, brownfield, industrial, housing etc
- Efficiency of solar panels and future technological advances
- Decommissioning, and guarantees in the event companies cease trading
- Recyclability of panels
- Benefits to the community
- Ability of national grid