FAO Planning Department

Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek Staffordshire Moorland
ST13 6HQ

SunEdison
1 Oliver's Yard, 7th Floor
55/71 City Road
London
EC1Y 1HQ

Dear Sir/Madam,

SCREENING REQUEST FOR LAND AT PARK FARM, ENDON, ST9 9JB

I write to formally request a Screening Opinion to determine the requirement for an Environment Impact Assessment (EIA) to be undertaken as part of a planning application for a solar farm at the above location. The request is made in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (EIA Regulations).

DESCRIPTION OF THE SITE

The site (Appendix 1: Site Location Plan) comprises two fields of gently undulating farmland with a total area of approximately 10 hectares. The site is located within an area designated as Greenbelt.

The closest residential areas are Stanley located approximately 750m west of the site and Endon, which lies approximately 1.1km north west of the site at its nearest point.

The closest residential properties lie within 300m of the site boundary at their nearest point.

The site is currently in agricultural use. It is broadly identified as Grade 3 or Grade 4 quality land as defined within Natural England's Agricultural Land Classification maps.

DESCRIPTION OF THE DEVELOPMENT

The proposed development involves the installation of photovoltaic panels with an installed capacity of approximately 5MW.

The panels will be laid out in rows which run east west across the site and will orientated to face due south. The rows of modules would be spaced approximately 6.5 to 7 metres apart and would likely be set back from any existing hedgerows by a distance of 5 metres.

Each panel would be mounted on two rows of supporting posts, with a tilt, depending on final design of between 10 and 15 degrees. The maximum height of the panels will be approximately 2.5 metres.

The structures will be designed to withstand the appropriate levels of environmental stresses for the location, including wind and snow loading.

Each photovoltaic module will be connected by an underground cable to one of the central inverters units that will be located around the site.

Electricity generated from the site will then be distributed to the national gird network via a substation which will be built in accordance with the standards of the Distribution Network Operator (DNO).

The site will be surrounded by a security fence of approximately 2 metres in height and the site will not require any external artificial lighting.

The key components of the proposed development are considered to be:

- Solar Panels (maximum height of 2.5m);
- Inverter Housing Units (assumed 3 in total. Approximately 2.2m(h) x 2.5m(w) x 8m(l));
- Site Tracks (Utilisation of existing farm tracks where applicable);
- Security Fence located around the perimeter of the site (approximate height of 2m);
- CCTV cameras; and
- Customer and DNO substation (designed to DNO required specification).

The final layout of the proposed development within the red line boundary will be informed through environmental studies and consultation with stakeholders and is yet to be finalised.

POTENTIAL ENVIRONMENTAL IMPACTS

Landscape and Visual

It is considered that as the height of the arrays would likely be limited to a maximum height of 2.5 metres, the visual impacts of the proposed development on the wider landscape will be limited.

In regards to the local landscape one public right of way (PROW) dissects the site from east to west and one PROW follows the eastern boundary. It is considered that any visual impacts would be mitigated by existing or new planting of vegetation to screen the solar farm. Additionally, any planting of vegetation will be used to enhance the biodiversity of the site.

The potential for glint and glare to occur is minimal as solar panels are designed to absorb light rather than reflect it.

A Landscape and Visual Impact Assessment (LVIA) would be undertaken and submitted as part of any forthcoming application. The LVIA would be completed in accordance with current best practice guidance.

Ecology and Biodiversity

The proposed development will be constructed on arable land that is broadly classified as either Grade 3 or Grade 4 quality land as defined within Natural England's Agricultural Land Classification maps

The proposed development site is not subject to any statutory designations for ecology or biodiversity.

The site is located within an area designated as Greenbelt. Any impact on the Greenbelt will be assessed within any forthcoming planning application.

It is unlikely that the proposed development will require the removal of any hedgerows or trees. Any trees and hedgerows planted to provide visual screening would be agreed with the Council to ensure the any biodiversity enhancements to the site will be maximised.

The design of the proposed development and forthcoming planning application will be informed by a full ecological assessment of the site.

Cultural Heritage and Archaeology

There are three Grade II listed buildings located within approximately 600m north of the site. However, the buildings are anticipated to screened by topography, hedgerows and existing built form.

There are two Scheduled Ancient Monuments (SAMs) located within 1.7km of the site. A moated site 1.3km north and a moated site located 1.7km south of the site. There are no Registered Parks and Gardens or Historic Battlefield within 1.5km of the site boundary.

The effects on below ground heritage features will be limited as it is likely that no more than 2% of the site would be penetrated, and in these limited areas the structure would extend to a maximum depth of 1.5 metres.

An archaeological desk based assessment will be undertaken to inform the final design of the proposed development and any forthcoming planning application.

Flooding

A Flood Risk Assessment (FRA) is required for the proposed solar farm as the site is larger than one hectare. The purpose of the FRA is to demonstrate that the development would remain safe throughout its lifetime, that it would not increase flood risk elsewhere and where practicable, that it would reduce flood risk overall.

The site is located outside any Environment Agency Flood Risk Zone and is therefore not at risk of flooding from rivers.

Furthermore, the coverage of the site by solar panels is limited due to the spacing between the solar arrays. On occasion where rainwater does fall onto the panels it would run off below and infiltrate the ground. The solar panels are therefore considered not to constitute an impermeable surface and would not increase the risk of flooding.

Noise

The only component of the proposed solar development to emit limited levels of noise will be the centralised inverters. Noise levels will be at their highest during hours of peak sunlight and will diminish during periods of cloud cover and lower intensity sunlight.

The proposed development will be powered down at night, so will be completely silent during hours of darkness.

Traffic

The proposed development's impact on the local highways will be limited to the construction period only. Once operational, traffic will be limited to infrequent maintenance checks.

A Traffic Management Plan will be submitted as part of any forthcoming planning application.

REQUIREMENT FOR AN EIA.

The EIA Regulations for the purposes of this Screening Opinion have been considered. An EIA is automatically required for 'Schedule 1' developments. The proposed development is not Schedule 1 development.

It is considered that the proposal falls within the category of 'industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)' under Schedule 2, paragraph 3(a) as described by the EIA Regulations.

Development proposals described under Schedule 2 require an EIA if they are considered likely to have significant effects on the environment by virtue of factors such as nature, size or location. Taking into account that the development site exceeds the screening threshold in Schedule 2 of 0.5 hectares it is necessary to screen the proposed development with the Local Planning Authority to determine if there are significant effects likely to arise from the proposal.

In determining whether or not an EIA is required the development proposal should be assessed against a number of selection criteria as stated within the Schedule 3 of the EIA Regulations. The selection criteria are as follows:

- Characteristics of development;
- Environmental sensitivity of the location; and
- Characteristics of the potential impacts.

Characteristics of the development

The key component of the proposed development will be the solar arrays which are limited to a height of 2.5 metres and will be screened by existing or new planting of vegetation.

Other infrastructure will be limited to a number of centralised inverter stations, a substation, security fencing and CCTV cameras.

The characteristics of the proposed development are considered to relatively unobtrusive.

Environmental Sensitivity of the Location

The site is not located within an environmentally sensitive area as stated by Regulation 2 (1) of the EIA Regulations (National Parks, World Heritage Sites, SSSIs and AONBs). Due to the unobtrusive nature of the proposed development it is considered that no impacts upon these areas would occur.

Characteristics of the Potential Impacts

The solar panels are of limited height, have no moving parts and will not produce any noise or pollution during their operation it is therefore considered that the magnitude and complexity of the potential impacts is limited.

The proposed development may be considered to be inappropriate development within the Greenbelt, however a number of Very Special Circumstances exist and will be demonstrated within any forthcoming application.

Any potential impacts will be further limited as the site's natural topography and vegetation will screen the majority of the site.

CONCLUSIONS

Given the nature of the proposed development there will be some local environmental impacts, however, it is not considered that these will be significant as set out in the relevant guidance. Accordingly, it is considered that this project is not classed as an EIA development.

In consideration of the above a full range of documents and reports will be commissioned from suitably qualified third party experts.

We propose that the following studies are prepared ad submitted with the planning application:

a) Landscape and Visual Impact Assessment;
b) Phase 1 Habitat Survey;
c) Desk based Heritage Assessment;
d) Flood Risk Assessment;
e) Transport Statement; and

f) Agricultural Land Classification Report.

This approach will provide Staffordshire Moorlands District Council with all the necessary information regarding the potential impacts of the development to carry out a thorough analysis of the proposed development, thereby facilitating the taking of an informed decision.

I would be grateful if receipt of this screening request could be formally acknowledged and we look forward to receiving the Council's Screening Opinion within the statutory three week timeframe as specified by the EIA Regulations.

Yours faithfully

Robert Stockford

Planning and Permitting Manager