Green Belt Statement

In Support of a Planning Application for the Installation of Standalone Solar PV Modules and Associated Infrastructure on Land at Heywood Grange, Dilhorne, Staffordshire, ST10 2PL

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Contents

Figures

1 Introduction

This report has been constructed during the determination period of a planning application for the installation of Solar PV and associated infrastructure on land at Heywood Grange, Dilhorne.

The aim of this report is to demonstrate that the proposed development does not impact upon the area designated as Green Belt and that the benefits of the scheme form the special circumstances which make the proposal suitable in this location.

The proposed site is shown in relation to the Green Belt designation in figure 1 below,

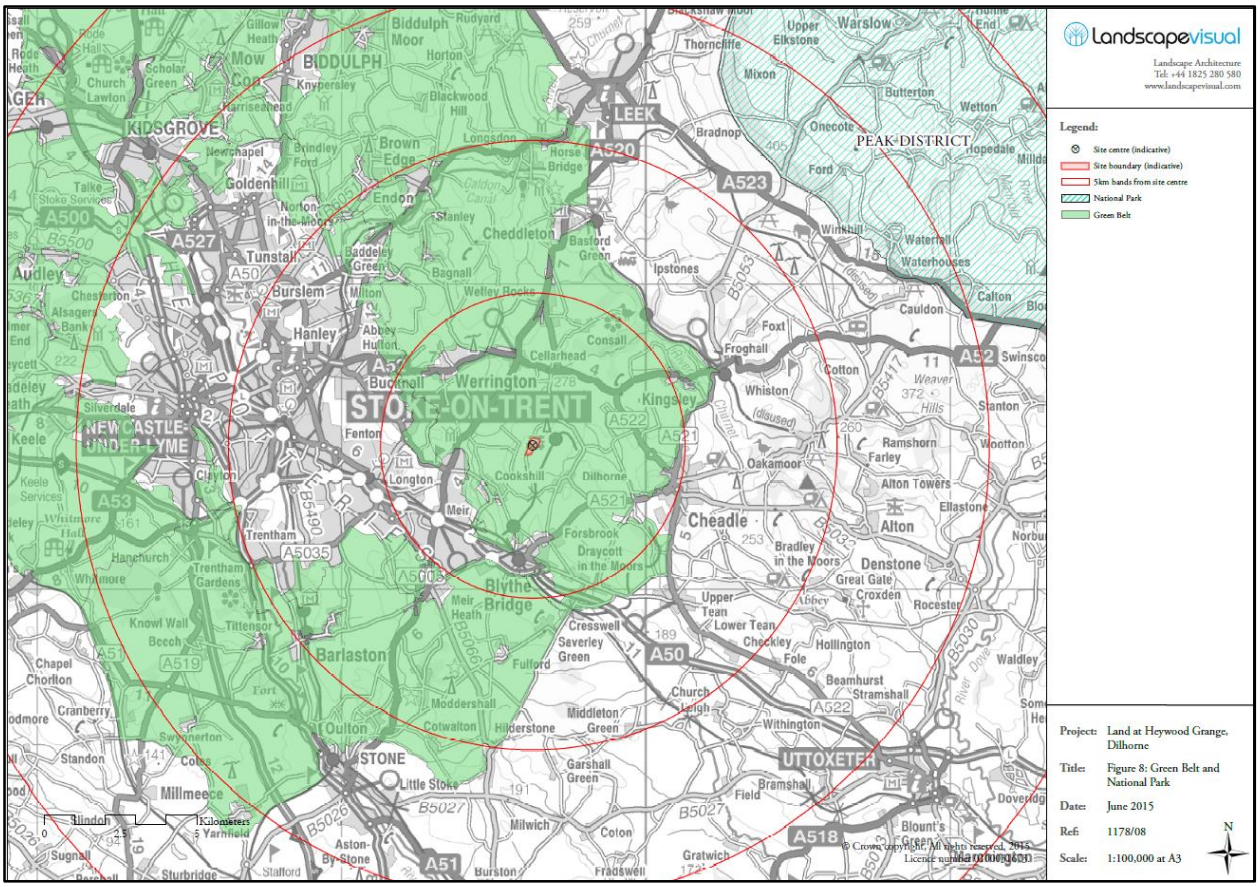

Figure 1: Showing the position of the proposed development in relation to the Green Belt designation

2 Green Belt Planning Policy in Relation to Renewable Energy

2.1 National Planning Policy

The National Planning Policy Framework incorporates policy which protects areas designated as Green Belts from inappropriate development.

Paragraph 79 of the NPPF confirms that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to **prevent urban sprawl** by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 91 confirms 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.

The NPPF clearly sets out that the purpose of the Green Belt is **to control urban sprawl**, (commonly understood to be permanent buildings such as houses and commercial buildings) and to guard against the coalescence of settlements. In this case, the proposal is not a form of development that could reasonably be described as urban sprawl and it is in any case temporary. It would also not give rise to or contribute towards the coalescence of two settlements. The proposals therefore do not offend against the core purposed of the Green Belt.

The framework is clear that while renewable energy proposals can constitute inappropriate development in the Green Belt, if the developer can demonstrate very special circumstances relating to the wider environmental benefits of the scheme then development can proceed.

2.2 Local Planning Policy

The relevant local policy is contained within the Staffordshire Moorlands District Council, Core Strategy Development Plan Document March 2014. This document reflects the themes regarding protection of the Green Belt as outlined in the NPPF as follows.

Policy SS6c Other Rural Areas Strategy states that, rural areas comprise the countryside and the Green Belt outside of the development and infill boundaries of the towns and villages, as defined in the Site Allocations DPD, including those small settlements and dispersed developments not identified in policies SS5, SS6a and SS6b.

These areas will provide only for development which meets an essential local need, **supports rural diversification and sustainability of the rural areas**, promotes sustainable tourism or enhances the countryside.

A number of measures are identified to ensure that development is appropriate in the Green Belt the most relevant being;

- Ensuring renewable energy schemes are of an appropriate scale, type and location; and
- Encouraging measures which protect and enhance the biodiversity, geological resources and heritage of the District.

Policy R1 Rural Development outlines the measures by which all development should be assessed against in rural areas, including; the extent to which development enhances the character, appearance and biodiversity of the countryside, promotes sustainable diversification of the rural economy, facilitates economic activity, meets a rural community need and sustains the historic environment.

With regard to Green Belt designation this policy also mirrors the NPPF's requirement for the demonstration of special circumstances in relation to development within the Green Belt.

3 Green Belt Appraisal

As part of the Landscape and Visual Impact Assessment undertaken in support of this planning application a Green Belt Appraisal has been undertaken to provide an appraisal of landscape and visual aspects of the five Green Belt Purposes which are to:

1. Check the unrestricted sprawl of large built-up areas;
2. Prevent neighbouring towns merging into one another;
3. Assist in safeguarding the countryside from encroachment;
4. Preserve the setting and special character of historic towns; and
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Seven individual viewpoints were considered and the impacts of the proposed development were assessed against each of the Green Belt Purposes. The Green Belt Appraisal concluded that none of the viewpoints show any significant impacts upon the Green Belt Purposes. This is primarily because of the following reasons:

- The layout respects the existing landscape structure of pastures bounded by hedgerows and woodlands.
- Dilhorne and Stansmore Woods to the east provide a high level of visual containment, meaning there are only limited views of the small parcels of the site from the surrounding area.
- Topography and woodland provide containment of views from the north and west.
- Landscape mitigation has been proposed which in the long-term would improve the structure of the landscape and reduce visual effects.

The above factors mean that there would be no perceived sprawl, merger, or encroachment from viewpoints near the site or in the surrounding area. This is particularly due to the separation from Stoke-on-Trent (above 2km to the west and totally outside of the ZTV) and Cheadle (approximately 3.5km to the east and largely outside of the ZTV), which are the nearest towns. The site is topographically separate from these nearest settlements and due to the containment provided to the development by the surrounding landscape, there would be no perceived contribution to sprawl or merger.

With respect to landscape and visual aspects of preserving the setting and special character of historic towns, the development is well-contained and would not be extensively visible from historic settlements with the exception of Dilhorne, from where the development could easily go unnoticed. The fifth Green Belt purpose would not be applicable to this site, which is currently grazing pasture.

The appraisal concludes that, the development is well-sited with respect to landscape and visual factors, and that the Green Belt purposes would not be harmed.

4 Sequential Test Approach

It has been highlighted by the case officer with regard to this application that a sequential test approach, considering other available sites outside of the Green Belt designation or suitable Brownfield sites has not been undertaken.

It can however be argued that a form of sequential test has been applied to this site, the applicant is an experienced solar PV developer and before considering this site sent out over three thousand letters to land owners across the country who own land within a viable distance from required HV power lines.

As a result of this process the site was chosen and a comprehensive design programme was undertaken, a planning application would not have been submitted at the site, if the site did not meet the limiting factors associated with any solar development. This form of sequential test has not considered the need for this development in this particular location due to the following reasons.

4.1 Limitations of the Sequential Test Approach

A sequential test approach for solar PV sites is considered impractical, due to the lack of publically available information regarding available sites and / or sites that have a viable grid connection for solar farm development. The sequential test approach is usually applied to housing developments where flood risk is an issue, in such instances the LPA's hold registers of sites available for housing.

The potential of land to accommodate a solar farm will principally depend upon the following factors:

- The availability of the land. In the absence of a register of available sites, this would involve identifying all landowners and personally entering dialogue with each.
- The suitability of the land. This would principally turn on the potential visual and landscape impact of developing each site for a solar farm. To obtain this information an individual Landscape and Visual Impact Assessment would be required for each site.
- The viability of the land. This would principally turn upon the proximity and capacity of local grid connections and the associated costs of accessing those services, as well as the land rent to be negotiated with the land owner.

Clearly for Heywood Grange it would not be practical to seek to contact and enter into negotiations with all potential landowners in the area. Initiating the process would require the LPA to hold a list of available sites for renewable energy development.

Similarly, even if the available sites could be identified, it would be impracticable and unviable to undertake initial landscape assessments as a minimum on each site, to establish whether or not a solar farm proposal would be likely to give rise to an unacceptable harm to the landscape.

Finally, (and notwithstanding the possible issues in negotiating a viable ground rent with a landowner), the availability of a suitable grid connection that would be within a reasonable proximity of a site and with suitable capacity, to enable the solar farm operator to be sure a development would be viable, can only be understood by undertaking a DNO grid capacity study, of each possible connection point. These searches are charged at a significant costs (usually in excess of £3,000) and undertaking numerous searches with no guarantee of a viable site being found is itself unviable and impractical.

4.2 Consideration of Nationally Available Previously Developed Land

On behalf of the Government, the Homes and Communities Agency manages the National Land Use Database of Previously Developed Land (NLUD-PLD), this provides a record of all brownfield sites in England. The database was set up in response to Government targets introduced in the late 1990s, for 60% of new housing development to be undertaken on brownfield land.

The NLUD-PLD categorises land into different land types. Of relevance to solar farm developments are categories A and C, land which is either vacant or derelict. Vacant buildings will not provide the size of land required for a solar farm (Category B), and land that is in use and allocated in local plan or with planning permission (Category D) will not be available for solar farm development.

The latest data available from the Homes and Communities Agency is from 2012. According to this data there are 4,487 sites categorised as Type A and C previously developed land in England.

Removing from this, those sites that are identified in the register as; having draft or full allocation in local plans, and outline, full or detailed planning permission. Leaves a total of 2,173 sites in England which may potentially be viable and available for solar farm developments.

Each of these 2,173 sites is assessed for its suitability for housing development within the register, analysis of the data has shown that:

- 1,235 sites are suitable for housing;
- 638 sites are not suitable for housing; and
- At 300 sites the suitability for housing is unknown.

If it is assumed that the 300 unknown sites are not suitable for housing then only 938 previously developed sites in England could be deemed suitable for solar farm development. This represents only 10.5% of all identified previously developed land in England.

Of all the 938 sites that could potentially be available for solar farm developments only six sites are available within Staffordshire Moorlands, these are summarised as follows;

- A 1.9 ha area of previously developed defence land;
- A 2.2 ha area of previously developed defence land, its listing suggests that the site may be of nature conservation interest;
- A 8.1 ha former quarry in the process of natural reversion;
- A 0.2 ha footprint of a former industrial building, the most suitable use of this site is listed as employment;
- A 0.4 ha area described as a former industrial works; and
- A 0.3 ha area associated with a redundant reservoir.

Only the former quarry site from the above listed sites is considered to provide a large enough area to accommodate a solar PV development, its listing states that this area is in the process of natural reversion. This suggests that this area will have a high ecological value, and therefore the installation of a solar PV development in this area would represent a net loss of biodiversity. This would be in direct contradiction to the NPPF.

4.3 Availability of Previously Developed Land within Staffordshire Moorland District

It is important that consideration is given to identifying previously developed land within the local area, even though the national statistics suggest that there is little suitable land within the local area.

The proposed development sits within the boundaries of Staffordshire Moorlands District Council, the Staffordshire Moorlands Core Strategy – March 2014 is the in force local development framework. The framework refers extensively to previously developed land and voices strong support for development to be concentrated in urban areas where there is the greatest potential for previously developed land.

Where identified, the driving force behind allocating previously developed land appears to be for Employment, Residential or mixed use land uses. It is not clear if any land has been allocated purely as previously developed.

A product of the Core Strategy will be the Site Allocations Development Plan Document, this document will identify land suitable for future development to help deliver the objectives set out in the Core Strategy. At the time of writing this report a public consultation exercise is ongoing between June and August 2015. It is not clear if sites suitable for renewable energy developments will be put forward during this process, or if the exercise will focus purely on housing and employment allocation.

As with the consideration given to nationally available previously developed land, it is reasonable to draw the conclusion that land which is allocated for residential, employment or mixed used development purposes will be unavailable for renewable energy developments of this scale. This is due to the cost associated with acquiring and preparing this land which would make renewable energy projects unviable.

4.4 Summary

It is clear that using a sequential approach, which is normally reserved for housing and employment land, to locate land suitable for renewable energy development is not practical, reasonable, viable or appropriate. The most appropriate approach is therefore to follow the requirements of planning policy and to consider the proposal on its merits having regard to the impacts on the openness of the Green Belt and the benefits of the proposal.

5 Benefits and Special Circumstances of the Heywood Scheme

The NPPF does not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and recognises that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. Therefore any contribution should be considered with significance and can form part of very special circumstances.

Estimates relating to the renewable energy generating potential of the site have been provided within the planning documents and further information has been provided by the developer during determination. It is worth noting that industry experience overwhelmingly points to the fact that installed systems often out preform their predicted generating potential.

The scheme proposed is the product of a detailed design phase and has been shown to be an integrated scheme which; adheres to the core principles of sustainable development, adheres to all relevant planning policy guidance and offers a range of environmental and economic benefits.

Aside from renewable energy generation the scheme incorporates the following benefits;

- The scheme is a simple and proven passive technology providing a source of safe, locally produced renewable energy for many years after construction, with no by-products.
- The application is supported by a range of assessments and reports which have found that potential impacts of the development are not significant and where they exist can be suitably mitigated.
- The proposal includes targeted plans to provide places for nature and wildlife, both by preserving the ecological assets onsite and by seeking to increase the biodiversity of the site in the future through sensitive management methods. These factors represent net gains for biodiversity in comparison to the current poor grade permanent pasture.
- The proposals are fully reversible and temporary. Therefore there would be no long term impacts from the development.
- The proposals will also generate both short term and longer term employment opportunities. In the short term, a local labour force will be required to prepare the site, deliver materials to the site and erect the solar farm. In the longer term a labour force will be required to monitor the site through CCTV, maintain the panels, and maintain the site, including the hedges and trees.
- The proposal will still enable the site to be grazed and subject to a suitable local flock being found will provide an additional agricultural income for a local tenant farmer.
- The landowner will receive a consistent and elevated income (per acre) for the land, over the period of the installation. The rent for the land would be expected to exceed the return for conventional farming on this land. This makes a significant contribution towards the rural economy, at a time when farming is becoming less and less viable and when farmers are beginning to rely upon innovative farm diversification schemes to support and compliment traditional farming practices.
- The development will be required to pay business rates at an annual fee of approx. £3,800 per installed MW. Over the life of the development this could total approx. £600,000.
- The Farm Business Review undertaken in support of this application has shown that the current business model for farming operations onsite is no longer profitable. The milking facilities onsite are out dated and no longer cost effective. This proposal represents an attainable diversification project for the farm, with few upfront costs and risks for the land

owners. The independent report concludes that without the income from the proposed development the business faces an unsecure future.

6 Conclusion

The proposed development of a solar PV installation at Heywood Grange is located within an area designated as Green Belt.

National planning policy confirms that the benefits of renewable energy may outweigh the harm to the openness of the Green Belt.

In this case, the proposed development has been considered to not impact upon the five Green Belt Purposes, and the number and extent of social, economic and environmental benefits of the proposal along with the significant contributions toward renewable energy targets form the special circumstances which make this proposal suitable.

The scheme also represents a clear oportunity to accord with the rural diversification policies as set out within the NPPF, the Farm Business Review undertaken in support of this application confirms that the existing farming regieme at Heywood Grange is in desperate need of support to ensure that the farm remains within the family.

In addition, the development is temporary, so the Green Belt will be fully restored in the future.