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| **From:** | Steve Massey |
| **To:** | Planning Comments (SMDC) |
| **Cc:** | Curley, Jane; Kate Dewey (k.dewey@staffs-wildlife.org.uk); Bayliss, Gillian |
| **Subject:** | SMD/2019/0368 - Bird Grove Farm, Hilderstone - request for Screening Opinion |
| **Date:** | 08 July 2019 18:30:54 |

The proposed development would be an industrial installation for the production of electricity, and the area of the development would exceed 0.5 hectares. The site is not within or adjacent to any of the "sensitive areas" (a) to (g) inclusive as defined in Section 2(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and therefore this 0.5ha threshold correctly applies in this case. In consequence, the proposed scheme would be a "Schedule 2 Development" in accordance with Item 3(a) of Schedule 2 of the Regs, for which an EIA may be necessary.

Government Guidance on Environmental Impact Assessment includes an Annex giving indicative screening thresholds for Schedule 2 developments; in relation to industrial installations for the production of electricity, the indicative threshold for requiring EIA is suggested as thermal output of more than 50MW, and further advises that small *(i.e. below this threshold?)* stations using novel forms of generation should be carefully considered. The applicant's screening request information advises that the proposed solar farm would have a planned capacity of approximately 49.9MW, just below the threshold. A solar panel farm would not now be regarded as a novel form of generation. Strict reference to these indicative threshold and criteria would therefore suggest that this particular Schedule 2 development would not require an EIA; however, the Guidance makes clear that these thresholds and criteria should not be applied rigidly, and that the LPA should still have regard to general guidance on determining whether EIA is required.

The Annex suggests the key issues to consider for electricity generation development are likely to be: level of emissions to the air; arrangements for the transport of fuel; and any visual impact. In practice, air emissions and fuel transport do not appear relevant to a scheme generating electricity by solar panels. However, visual impact clearly would be a key issue to consider for this proposal. Whilst it is evident from the site location plan provided that this would be a large scale development, the true extent of the site is even more fully appreciated from a site visit.

Due to:

- the location and aspect of the site on a plateau, and in a contained shallow valley, within a gently rolling wider topography;
- the existing landscape structure of fields, hedges, hedgerow trees and woodlands;
- the relative sparsity of public rights of way and public highways in the immediate vicinity affording views of the site;
- and the relative lack of elevated viewpoints in the surrounding area offering mid-range or close-range views of the site,

at this stage it appears more likely that any visual impact of the proposed development would be mainly experienced from adjacent to or within the overall extent of the site. The Cresswell-Hilderstone Road runs close to and in some places immediately adjacent to the site boundary, and Public Footpath No. 24 (Draycott Parish) – also carrying the promoted route of the "Stone Circles Challenge" – runs along the tarmac farm track bisecting the site, being immediately

adjacent to the site boundaries for some 585m and also affording close range views of the site for a further 430m – 600m or so of its length.

The applicant's screening request advises that a Landscape and Visual Impact Assessment (LVIA) would anyway accompany any planning application; a full and comprehensive LVIA certainly should be required even if full EIA is not, and at this stage the screening request's contention that visual impact of the proposed scheme would be "minimal" is considered premature.

In a similar vein, the screening request somewhat jumps to the conclusion that the ecological value of the various fields "is limited to the hedgerows" as the "majority" of the fields have been the subject of progressive and modern agricultural practices. Whilst it is appreciated that improved grassland or intensive arable farming may well be less favourable for wildlife, it would not be safe to assume no/limited ecological impact without proper assessment. Further to this, the screening request states that the site neither includes nor is in close proximity to any national or local nature conservation designation, but in fact it is noted that the site has over 400m common boundary with the immediately adjacent Bromley Wood which is included as an Ancient Semi-Natural Woodland in the Staffordshire register of Ancient Woodlands and therefore of notable and irreplaceable habitat value.

In addition to assessing any potential ecological impact on Bromley Wood, any planning application should also be supported by a suitable tree survey/arboricultural impact assessment report in accordance with British Standard 5837:2012 *Trees in Relation to Design, Demolition and Construction - Recommendations* which should consider how the trees in Bromley Wood, and also the hedges and hedgerow trees forming the boundaries of the various fields making up the site, may be physically affected by the proposed solar farm – unless it is demonstrably clear from the layout and structure details to be submitted with a planning application that there would be no such impact. Such consideration should take account not only of the construction/installation of the frames and panels themselves, but also any impact arising from temporary construction access and on-going operational/servicing access, together with any associated infrastructure provision for drainage, transformers and links to the electricity network etc.

Whilst there are no "sensitive areas" within /adjacent to the site, which would include Scheduled Ancient Monuments, it is noted that in the south-easterly field of the subject site adjacent to the north-western boundary of Bromley Wood there is a non-designated heritage asset being identified on Statmap as the earthwork remains of a medieval moated site. Presumably therefore some appropriate heritage assessment of the nature, condition and value of this moated site, and of how it may be affected by the proposed solar farm development, should also be submitted with any planning application.

**Having regard to the location and description of the proposed development provided in the screening request, the absence of "sensitive areas", and the indicative criteria and thresholds set out in Government Guidance on EIA, it is considered on balance that a full EIA would NOT be required in relation to the issues addressed in this e-mail, but subject to the submission with any subsequent planning application of the following supporting assessments (which would anyway be required in connection with an application for a large scale development proposal in the rural area irrespective of EIA screening requests):**

- **A full, comprehensive LVIA**

- **An ecological assessment report (subject to/in accordance with guidance from SMDC's ecological planning advisers)**
- **A tree survey/arboricultural impact assessment report (unless the submitted details of the application evidently demonstrate that any such impact would not occur or would be so unlikely as to not reasonably require such a report)**
- **A heritage assessment/statement in relation to the medieval moated site (subject to/in accordance with guidance from SMDC's senior conservation officer)**

**Steve Massey**

Arboricultural Officer / Development Services
Staffordshire Moorlands District Council and High Peak Borough Council

*Moorlands House, Stockwell Street, Leek, Staffordshire Moorlands ST13 6HQ*
*Tel: 01538 395788 Mobile: 07545 423071*

E-mail: steve.massey@staffsmoorlands.gov.uk

www.staffsmoorlands.gov.uk www.highpeak.gov.uk

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