

Third Revolution Projects

Planning Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell St.
Leek, ST13 6HQ

Registered No.:
10204013

10 June 2021

Totmonslow Solar Farm, ST10 4JJ – Request for a Screening Opinion for a Solar Farm.

Dear Sir / Madam,

Third Revolution Projects has been instructed by RE Projects Development Limited (REPD, “the applicant”) to request an EIA Screening Opinion for a proposed solar photovoltaic (PV) farm development with continued agricultural use, ancillary infrastructure and security fencing, landscaping provision and ecological enhancements at on parcels of land south of Totmonslow Farm, Draycott in the Moors, Staffordshire Moorlands, ST0 4JJ. The land is currently grazed and is approximately 36 hectares in area.

1.0 Development Proposal

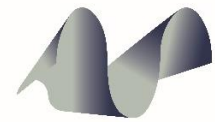
The proposal is for the temporary erection of multiple rows of Solar PV arrays similar to those shown in the image below, for a duration of up to 40 years. The approximate maximum installed capacity the applicant is looking to develop would be 15 MW though this is subject to detailed design and site layout. The PV arrays will be ground-mounted and are not expected to exceed 3m in height at their highest point. Solar panels will be positioned within the existing field boundaries to avoid needing to remove hedges or trees.

Site access is expected to be taken via Draycott Road and into the existing farm access for Totmonslow Farm located to the northwest of the site. The proposal will require the installation of several inverters (or micro-inverters) and transformer cabins, in order to convert the generated electricity into a form compatible with the substation.

The solar arrays will generate electricity during daylight hours, which will be fed into the local distribution network for use in homes and businesses on the network.

In order to secure the site, the applicant proposes installing a new post and wire deer fence with associated access gates. The proposals will promote the opportunity to graze sheep on the land, alongside significant biodiversity enhancements.

Images of a similar solar farm are shown below. The first image shows solar panels in their setting enclosed by protective fencing and the subsequent images show the sufficient gap from the ground to accommodate the grazing of sheep and the sorts of ancillary infrastructure that will be required alongside the solar arrays.



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A typical solar array and post and wire deer fencing



Use of hedging to screen a solar farm



Solar farms are designed to allow sheep to graze around and under the panels



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Typical fencing and security cameras



Example of a brick substation building and inverter/transformer cabin

2.0 Proposed Planning Application Data

Subject to the feedback received from this communication, it is our intention that a subsequent detailed planning application will be accompanied by some or all of the following information and studies:

- Site Location Mapping
- Site-Specific Layout Plan
- Sample Elevation details of key components
- Planning, Design and Access Statement
- Photomontages or similar visualisations
- Landscape and Visual Impact Assessment
- Heritage Impact Assessment

- Agricultural Land Classification Survey
- Flood Risk Assessment and high-level Surface Water Drainage Strategy
- Preliminary Ecological Appraisal Report
- Construction Traffic Management Plan
- Topographic Survey
- Mitigation and Enhancements Plan

It is considered that the above information would enable the assessment of the application, but we would welcome the opportunity to discuss submission requirements as need be.

3.0 Screening Opinion Checklist

On Assessing the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, our opinion is that the site's Screening Opinion Checklist would result in the following responses:

1. Is this a Schedule 1 Development? *No*
2. Is this a Schedule 2 Development? *Yes - (3) Energy Industry, (a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*
 - a. Is the site in a 'sensitive location'? *No*.
 - b. Is any of the applicable threshold or criterion in the table in Schedule 2 met or exceeded? *Yes*
3. Would the development site be likely to have significant effects on the environment (nature, size, location) *No*

Our opinion of the responses for the Schedule 2 conclusions are set out below.

While the proposed development exceeds the Schedule 2 threshold of 0.5ha, it does not sit within or partly within a sensitive area. The Regulations define sensitive areas as Sites of Special Scientific Interest (SSSI) and European Sites, National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB), and World Heritage Sites and Scheduled Monuments.

The Environmental Impact Assessment Planning Practice Guidance (PPG) (paragraph 032) states that local designations which are not included in the definition of "*sensitive areas*" but which are nonetheless environmentally sensitive may also be relevant in determining whether an EIA is required. In considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards are already being approached or exceeded.

There are no sensitive sites or areas as defined within the EIA Regulations or PPG located within the site. The closest designated area is the Slatersford Lane Meadows, SSSI located approximately 9.1km northeast of the site.

Additionally, there are no protected or ecologically sensitive areas on or around the location in close proximity which could be affected by the project, e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. However, a small parcel of land located within the proposed development area has been identified to have biological importance and has been given a status of a Local Wildlife Site with species-rich semi-improved pasture as per the adopted Staffordshire Moorlands Local Plan, 2014-2033.

A Preliminary Ecological Appraisal will be undertaken to identify any protected, important or sensitive species, and additional surveys will be undertaken if required. The land is currently grazed, existing field access points utilised and hedges and trees protected our development will not create any additional impacts on existing wildlife or protected species that cannot be managed through the normal planning application process.

The following demonstrates why we have concluded that the scheme will have no significant effects on the environment and therefore should not require an Environmental Statement:

3.1 Characteristics of the development

The size of the development – The proposed development will be approximately 36 hectares in size located within two parcels of grazed farmland. When deployed this will have a capacity of approximately 15 MW. The panels will stand up to 3m (highest point) off the ground and the site will be secured by a post and wire deer-proof fence, which will be approximately 2.4m high.

The cumulation with other developments – An operational solar farm is located at Lower Newton Farm, approximately 250m south of the proposed development. While this operation solar farm is located in close proximity, they are separated by the A50. Due to the topography, intervening vegetation, hedgerows and mature trees along with a major road located between the two sites, any additional visual impacts are expected to be negligible and the developments will not be seen in the same view. A cumulative impact assessment can be submitted as part of the planning application.

The use of natural resources – The development utilises sunlight, a renewable resource, to generate power. However, the materials used in the manufacture of the equipment for the scheme are an abundant resource that can be recycled at the end of the development's life. In this regard, the use of any natural resource would be sustainable.

The production of waste – The development will not produce any waste during operation. At the end of the development's life, the materials used can be recycled. The minimal amount of waste generated during the construction period will be sustainably managed.

Pollution and noise – Potential nuisance from the development would be mostly limited to some short-term noise, vibration, vehicle movement and dust, potentially created during the construction phase. The nature of solar farms means that no hazardous, toxic or noxious substances will be released, nor will there be a risk of contamination to air, water or land. There will be no permanent lighting and no releases of heat, energy or electromagnetic radiation to the environment. The proposal does not require significant earthworks and the site will be self-contained. It would be a normal practice that the potential construction phase nuisances would be controlled via planning conditions attached to any subsequent planning permission. As such there would be no significant impacts in terms of pollution or nuisances. The only noise arising from the development will be associated with the equipment used to keep the inverter units cool during hot weather. These are unlikely to be audible from outside the site.

The risk of accidents having particular regard to substances or technologies – Solar farms contain no materials that are combustible or liable to explode.

The risk to human health – Solar farms do not produce any pollutants that would present a risk to human health.

3.2 Location of development

The existing land use – The land is currently grazed. During operation, it is intended that sheep will be permitted to graze around the solar panels in order to manage field growth and therefore will retain an agricultural use throughout its operation. The site can be returned to agriculture at the end of the development's operational life.

The relative abundance, quality and regenerative capacity of the natural resources in the area – The natural resource being used is sunlight, which for all intents and purposes is limitless. The location, layout and design would retain and enhance natural biodiversity and landscape features. The site comprises lower grade agricultural land (Grade 3) which is abundant in the area and the development would not result in the loss of agricultural use. The lower intensity agricultural use, its continuity during operation, plus the ecological and long-term agricultural benefits would improve the ecological quality of the site. Therefore, the quality and regenerative capacity of the natural resource will improve as a result of the scheme.

The absorption capacity of the natural environment – The site is currently divided into two areas by a disused railway line. The fields located to the south/south-east of the railway line slopes upwards towards the north-eastern boundary, and down towards the south-eastern boundary. The proposed layout will set the arrays away from this disused railway and PRoWs that are located within and adjacent to the site to be able to absorb easily into the natural environment. Additionally, no existing hedging and trees will be removed thereby helping screen the development to avoid any visual harm along with retaining the existing field pattern. Further analysis on visual impacts will be covered in the Landscape and Visual Impact Assessment which will be submitted with the planning application.

The effect of this is to allow the scheme to be absorbed easily into the natural environment. The effect that the proposals have on the natural environment should not be considered significant, due to its limited visual and negligible pollution and waste impacts as detailed above.

3.3 Characteristics of the potential impact

The magnitude and spatial extent of the impact – In terms of magnitude, the impacts are likely to be low or can be mitigated through siting and design measures. The visual impacts of the site will be limited due to the low height of the development, existing hedgerows, limited numbers of sensitive receptors and the proposed inclusion of additional screening around boundaries and PRoWs. These will be addressed within the Landscape and Visual Impact Assessment which will accompany the subsequent application.

The nature of the impact – Solar farms are typically low impact developments and on the proposed site, these would be limited to some visual impacts. However, the impact would be largely limited to within the site itself and could be suitably mitigated as part of this development.

The development sits on moderate quality agricultural fields which will enable diversification of agricultural land. This proposed development has been designed to allow for substantial biodiversity

improvements and the land to naturally regenerate while activities such as sheep grazing can take place.

A PEA will be submitted as part of the planning application which will determine any precautionary approach or further surveys which will be required for the development of a solar farm. The Local Wildlife Site will be protected during operation by restricting grazing and other management, protection and enhancement measures to be determined following the PEA.

The site is located within Flood Zone 1. A Flood Risk Assessment will be submitted as part of the planning application.

The nature of the scheme will keep the ground beneath available for agriculture and biodiversity enhancements and these risks are not expected to place significant constraints on the development or the surrounding area.

The transboundary nature of the impact – No significant transboundary (national or international) impacts are envisaged.

The intensity and complexity of the impact – In terms of complexity, the principal impacts have been defined above and are not considered to be complex in nature and are clearly understandable. Any visual impact would be limited to a small area. The noise would be emitted by the substation and transformers during operational (i.e. daylight) hours but this will be very low level and the equipment can be sited away so that the intensity of this impact will not be significant outside of the site itself.

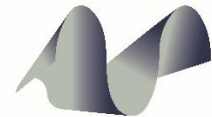
The probability of the impact – Although a small amount of impact will arise from the development during operation, as described above, it is considered that these will not be significant and can be appropriately mitigated.

The expected onset, duration, frequency and reversibility of the impact – Although the proposed development is for 40 years, at the end of the operational period, site restoration will be relatively simple and all equipment removed, leaving no long term impacts or pollution. Due to the continued grazing of the land throughout its lifespan and the limited construction impact, any potential impacts are completely reversible.

The possibility of effectively reducing the impact – The visual impact from the development would be minimised through enhancing the existing natural and introducing additional screening where necessary.

Additionally, the land beneath and around the solar farm can be managed to provide significant biodiversity enhancement. This includes:

- The land being taken out of intensive agriculture and the fields planted with lowland meadow seed or similar to enhance biodiversity to benefit a wider range of species.
- The mix will be agreed upon with a qualified ecologist but will include native forage plants for butterflies and bumblebees and fine grasses which encourage diversity.
- Other parts will be managed for conservation, with sheep grazing or mowing from September - March and a pause from April - September to allow wildflowers to flower and set seed.



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- Herbicides reduce wildflower diversity and create conditions suitable for weeds. Therefore, their use will be restricted to spot treating of pernicious weeds (docks, thistles and ragwort) wherever possible.
- Open areas within the solar farm will be managed specifically for ground-nesting birds by grazing at low stock density through the winter and allowing the grasses to grow up through the bird breeding season (March - July inclusive).
- Existing hedges will be retained and managed while new hedging will be proposed to enhance existing biodiversity and screen the development wherever necessary.
- Extra care will be taken when clearing any vegetation or when working within proximity to the hedges and trees to not disturb any habitats and/or species.
- Any construction works to be undertaken outside of the main bird nesting season or works appropriately managed to avoid any harm.

Based on these and the site-specific location, we hope you support our view that our proposals will have limited but acceptable environmental impacts, which should be addressed via the formal planning application process and the development is not likely to result in significant impacts in terms of the EIA Regulations, so does not need to be subject to an EIA.

I look forward to receiving the Screening Opinion in due course. Please do not hesitate to contact me with any queries.

Yours Faithfully,

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