

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 16 August 2021 19:36:58

Application Reference No. : SMD/2021/0496 Site Address: Land at Greenfields Farm Thorney Edge Road
Bagnall Staffordshire ST9 9LA Stoke On Trent Comments by: Mark Johnson Moorlands Climate Action

From:

12
Hawthorn Terrace
Leek
Leek
Staffordshire
ST13 6AW

Phone:

Email:

Submission: Support

Comments:

Moorlands Climate Action is writing to express its support for the proposed solar energy farm at land adjacent to the Cellarhead electricity substation.

We respectfully ask that the following is taken into account in the planning decision:

1) SMDC's declaration of a Climate Emergency in June 2019, its promise to get the district to Net Zero by 2030, and repeated declarations since then that encouraging renewable energy will be a key part of SMDC's Climate Action Plan. The first definitive version of this iterative Plan is due in November and will contain a more concrete expression of SMDC's strategy for encouraging renewable energy generation in the district.

2) SMDC's commitment to action on climate change is already woven through the Local Plan. This is expressed in general, but unmistakable terms on Page 28. Planning has a key role to play in mitigating the causes and effects of climate change through the location and nature of development and by helping to shape places which have lower carbon emissions and are resilient to climate change. The District should aim to contribute to the wider Government objective of achieving a low carbon future.

3) This is translated into explicit support for renewable energy within the Local Plan. This, together with any potential for conflict with other Local Plan imperatives, is fleshed out in Policy SD2 (Renewables/Low Carbon Energy), which states: "The Council will strive to meet part of the District's future energy demand through renewable or low-carbon energy sources (which could be through a variety of technologies, for example solar energy, biomass etc)." Wind energy is treated under a separate, more restrictive planning formula but in the words of the Local Plan: "For all other forms of renewable energy [other than wind] the Council will support small- and large-scale stand-alone renewable or low-carbon energy schemes, subject to the following conditions:"

4) With regard to those conditions (set out in Policy SD2) MCA asks SMDC to note:

- a. The environmental, social, and economic benefits of a scheme for renewable energy in the district are clear and are in line with national policy as expressed in the National Policy Planning Framework (NPPF), multiple relevant Acts as well as consequent SMDC policy, as expressed (inter alia) in the Local Plan.
- b. The proposed site will be screened and will be far less visible than the pylons which already march across adjacent countryside (and directly over Wetley Moor).
- c. The site is in an agriculturally 'Less Favoured Area' and we believe it to be Grade 4 agricultural land, defined as 'poor', thus according with the stated preference for use of 'poorer quality land' for sustainable energy development set out under Policies SD2 and SD1 (Sustainable Use of Resources.)
- d. Policy SD2 states a preference for brownfield sites for solar development where possible. We note that brownfield sites with sufficient footprint, unobstructed south-facing aspect and unallocated for housing are likely to be very rare in Staffordshire Moorlands, particularly when associated with ready offtake to the National Grid. Other superficially attractive locations, such as Conrad Energy at Chatterley Whitfield, lie in Stoke-on-Trent Unitary Authority and cannot therefore be regarded as options for the purpose of this decision. Nor would they contribute to SMDC's explicitly expressed desire in the Local Plan to foster in-district renewable energy.
- e. Brownfield sites are anyway typically worth far more if developed as housing and have often been allocated for this purpose already. This will rule out market availability of many (if not any) potential brownfield sites for solar energy. [We suggest that, subsequent to this decision, SMDC's planning department and the communities and climate officer together draw up a roster of unallocated brownfield sites in the district that have potential for renewable energy generation. This cannot be a difficult task as the planning department should already maintain a brownfield register under The Town and Country Planning (Brownfield Land Register) Regulations 2017.]
- f. The proposed site under this application is set next to an electricity sub-station and its extant pylon structures, allowing for efficient offtake of output and without the need for substantial further infrastructure.
- g. The site has no particular landscape, habitat, or species designation (other than proximity to Wetley Moor SSSI which we presume will be covered by the Staffordshire Wildlife Trust submission). It is not in, or near, any Area of Outstanding Natural Beauty nor National Park. Nor is it near any statutory Historic Monument.
- h. The biodiversity impact of any solar farm development can (approximately) be divided into two categories: site-specific ecological value and any incident effect upon patterns of wildlife behaviour (e.g., bird and bat flight patterns from significant locations). The site's biodiversity itself is more likely to be enhanced than damaged by use as a solar farm; as heavily used land with probably substantial historic inputs of fertiliser and pesticides the site is very likely to be relatively degraded in terms of flora and fauna.
- i. There is a growing literature on the subject of solar farms and wildlife; a comprehensive survey of the evidence is presented by Natural England in its 2016 research survey. We ask SMDC to familiarise themselves with the December 2014 RSPB Policy Briefing on Solar Energy which states that: 'Large PV arrays mounted in agricultural fields (or other non-urban/unsealed areas) are unlikely to be a concern from a nature conservation perspective provided they are developed in suitable locations. There is no evidence that solar farms displacing agricultural production is a concern at the current scale of deployment. Furthermore, solar farms can in fact provide complimentary opportunities for agricultural activities such as conservation grazing and may also benefit future production by effectively letting land lie fallow whilst the installation is in place.' The RSPB caveat on scale cannot, of course, be relevant in Staffordshire Moorlands where only one solar array exists, many miles away, near Draycott-in-the-Moors.
- j. We suggest that SMDC requires the plan sponsor to provide the necessary biodiversity management plan for the application. Staffordshire Wildlife Trust could be asked to advise on using the opportunity to help the site 'bounce back' in terms of biodiversity if it is taken out of intensive agricultural use as a consequence of approval of the solar farm project. We recommend SMDC consults the BRE (2014) Biodiversity Guidance for Solar Developments. An RSPB document on best-practice mitigation and biodiversity enhancement for solar farms is also available.
- k. Unlike other developments, such as housing, the solar farm site has an assigned life cycle and can be returned to agriculture or other uses (and as the RSPB report makes clear, almost certainly in a better state of

biodiversity and soil quality).

5) With regard to the siting of the proposed solar farm in the Green Belt, MCA fully understands and shares the general commitment of SMDC and many of its residents to its preservation, but notes that the founding principles of the Green Belt are (inter alia) (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment. Green Belts are not a legal designation like a National Park, but are established by policy, through local development plans, which themselves are established in the context of national planning policy. We therefore note two considerations we believe highly relevant to this application: one relating to the wider issue of solar farms and the Green Belt, the other to the specifics of Staffordshire Moorlands and the council's freedom to pursue clearly expressed policy objectives woven into the Local Plan.

6) Section 6.67 of the Local Plan asserts that 'The Green Belt serves a number of purposes which are derived from Government policy in the NPPF; national policy on Green Belts is set out in the NPPF and will apply to the whole of the Green Belt.' There is now a growing and coherent body of planning precedents on solar PV generation in England (much in the Green Belt); these have taken into material account national government policy on climate as expressed through the Climate Change Act 2008, Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (policy must 'contribute to the mitigation of, and adaptation to, climate change') and the NPPF. These decisions have made clear that solar farms can be considered appropriate developments in the Green Belt, that the NPPF can be taken to support this, and that a council's own declaration of a climate emergency is a relevant matter in planning decisions. We ask that SMDC fully takes the time to understand this challenged but unmistakable shift in balance in the national planning agenda.

7) As pointed out by SMDC planning officers in the August 5th, 2021, presentation to members of its Climate Change Working Group, national government has recently strengthened language and guidance on climate in the National Policy Planning Framework, including the taking in of the UN Goals for Sustainable Development and the explicit insertion of climate change mitigation and adaptation in the 'presumption in favour of sustainable development' requirement.

8) Around one-third of SMDC surface area is covered by the National Park, almost another third falls under the Green Belt. To designate the Green Belt as a no-go area for renewables such as solar would leave only the remaining third of SMDC land area in which to operate both its legal requirements and clearly expressed policy commitments on climate change and renewable energy. SMDC has clearly said that the response to climate change must be borne equitably across the district and its citizens; all residents of the district consume energy which must be produced somewhere (and in this case, sustainably).

9) We ask SMDC to take note of the 2010 CAMCO study on renewable energy across Staffordshire (commissioned by, among others SMDC, and referenced in the Local Plan). This study preceded the decade-long advances in the technical and economic viability of solar PV energy, which have been a major component of national decarbonisation, and so did not deal with solar energy. It did, however, highlight the relative paucity of options for renewables in the district: 'Staffordshire Moorlands offers the smallest potential for meeting its energy needs locally, compared to other partner Authorities'. renewable energy generation by 2020 struggles to meet half of the 'lower' benchmark level approximated from national targets. The analysis contained in the second part of the above quote is out of date; given the subsequent shift in the climate and renewables arena, SMDC is likely to have to now run faster to stand any chance of catching up with comparable authorities.

10) Wind-generated energy in the district has all but been ruled out by national and local planning policy. SMDC's own CAMCO report shows that hydropower potential in the district is tiny. If SMDC is to approach

levels of sustainable energy generation elsewhere in the county and country, let alone meet its declared aim of being a leader in action on climate change, it seems inconceivable that well thought-out and appropriate opportunities for in-district solar generation can be spurned.

11) We note that the issue of safety of battery installations has been raised. We ask that SMDC acquaints itself with the latest scientific and technical knowledge on the subject which we are confident will show that properly installed and managed installations present no undue danger.

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at <https://www.staffs Moorlands.gov.uk/YourData>
