

9th September 2021

Mr Sylger Jones
Hut On A Hill Limited

By email

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

Proposed development: Solar farm (approx 2268 panels) of approximately 1.5MW with Battery storage facility (approx 60 containers) up to 57MW on 4.25 hectares of land at Greenfields Farm Thorney Edge Road Bagnall Staffordshire ST9 9LA

I refer to your request under 6 (1) of the above Regulations for an opinion as to whether the above proposal is EIA development requiring the submission of an Environmental Statement

The proposal is for solar panels and battery storage. The site extends to approx. 4.25 hectares. It comprises of approx. 2268 fixed solar panels each with inverter and maximum height of 3m. There would be approx. 60 lithium ion battery containers mounted on concrete plinths 0.6m high. The containers would have dimensions of approx. 8m x 3.5m x 3m. There would be a substation, inverter/transfer stations 7m x 2.5m x 3m, other storage containers for operations and maintenance purposes, cabinet containing communication and monitoring equipment, perimeter fencing with CCTV, internal gravel access tracks. A new access linking the site to Thorney Edge road via an existing farm access is also included.

The proposal is Schedule 2 development. It falls within Column 1 under 3a) *Energy Industry: Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1)*

For such development Column 2 refers to the applicable threshold and criteria being the development area exceeding 0.5 hectares. As this is exceeded in this case, a Screening opinion is required.

In preparing this screening opinion the LPA has had regard to the selection criteria in Schedule 3 of the Regulations. To assist in determining whether the project is likely to have significant environmental effects the LPA has also had regard to the Indicative thresholds in the Planning Practice Guidance. This advises that key issues to consider include emission to air, arrangements for the transport of fuel and any visual impact.

The LPA also has used the recommended Screening Matrix.

Characteristics of the development

The size of this proposal is larger than the threshold area which may suggest an EIA could be needed. These refer variously to sites of more than 0.5 hectares and outputs of more than 50MW.

The main impacts are expected to be landscape/visual, noise and traffic during construction. However the view reached is that these impacts are unlikely to give rise to significant effects in terms of the Regulations but that is not to say they will not require very close scrutiny at the planning application stage.

The solar panels and battery containers would sit within a compound enclosed by 3m high security fencing with surveillance equipment at a similar height and at regular intervals. Although the structures are not particularly high, the development as a whole has the potential to impact adversely in this rural area, constituting as it would a very urban form of development. The new access track shown on Appendix A adds to this impact. A comprehensive Landscape and Visual Impact assessment and detailed Landscaping scheme will be required to demonstrate that landscape/visual impact can be mitigated to an acceptable level.

There are houses relatively nearby whose amenity could be impacted by the proposal as a result of noise emissions from the battery containers, substation, construction traffic etc. A Noise Impact Assessment will be required to demonstrate that any impact identified can be mitigated so as not to add to ambient noise levels or result in undue disturbance to the occupiers of nearby residential properties.

In terms of traffic generation, once operational it is understood that the facility will be largely unmanned and thus traffic generation would be minimal. During commissioning there would be construction traffic. Full details of this are unknown and would need to be provided in a Transport Statement and Construction Management Plan to include the daily number, types and sizes of delivery vehicles; approach routes for deliveries; consideration of the effect of large delivery vehicles on relatively narrow lanes and proposals to safeguard or repair damage to carriageway, edge and verge. Details of visits required for ongoing operations and maintenance will also be required.

The ecology of the site is not known. However advised by Staffordshire Wildlife Trust, it is considered unlikely that the proposal would lead to significant ecological impacts provided net gain is provided. However were a major fire to occur on the site, this could impact a large area in terms of pollutants and potentially cause habitat loss via fire spreading. The likely significance would depend on appropriate fire avoidance and management design/ actions during operation.

The export of the energy stored would be transmitted via new underground high voltage cable to Cellarhead substation which is understood to be located 450m to the northeast.

Overall the characteristics of the development are considered unlikely to give rise to significant effects for the purposes of the Regulations.

Location of the development

The site is not within a Sensitive area in terms of the Regulations. The site is within the Wetley Moor SSI impact zone but the proposal is considered unlikely to cause any direct impacts. The main risk would likely be from a major fire outbreak but this is considered unlikely given the ability to incorporate mitigation measures. The site is within the Green Belt and is open countryside in a rural area characterised by isolated farmhouses and dwellings. The character of the landscape will completely change for the lifetime of the development. Although it is reversible, the submission indicates a life of 40 years. The matter of landscape character and

visual impact will be a key consideration in the planning application. It will need to be addressed as part of the comprehensive Landscape and Visual Impact Assessment referred to above. For the purposes of the Regulations however significant effects are considered to be unlikely

Characteristics of the potential impact

The impacts in this proposal are specific and judged relatively limited in the EIA assessment context so as not to be considered complex. Although the life of the project is given to be 40 years, which would represent a significant proportion of people's lives, the impacts are likely in the main to be readily reversible should the development be brought to an end and removed. Overall, the LPA is of the opinion that any potential impacts would not be of a magnitude to suggest that an environmental statement is required. There would be no trans frontier impact. The development would not be of more than local importance and would not involve unusually complex and potentially hazardous environmental effects. There would be no significant cumulative effect. Although the proposal will be seen in association with the existing substation, the scale is such that it would not be significant in terms of the Regulations.

In terms of cumulative impact, the Council has recently issued negative Screening opinions for two battery storage facilities in the vicinity of the site, also associated with the Cellarhead Substation, references SMD/2021/0352 and 0413. The site SMD/2021/0352 had formed part of much larger site for a solar farm for which a negative opinion was also issued in 2019 under SMD/2019/0568.

In your e-mail of the 5th August 2021 it is said that should applications subsequently be granted for the SMD/2019/0568 site and the subject site, then the intention of the applicant would be to develop both. No planning applications have been received or granted for any of the proposals mentioned above. Neither has the LPA has not been provided within any substantive information/evidence concerning the likelihood of all the developments progressing or the timing of this. Furthermore the subject site has limited if any visual connection with the other sites and it uses a different access route.

It is known that the available capacity for new connections at the Cellarhead substation is likely to be a limiting factor, see National Grid document, National Grid, GSP Availability, publicly available on line but brought to the attention of the Council by another party, which shows 276 MW of available demand headroom/ import capacity at Cellarhead This could presumably be increased by expanding capacity but there is no evidence that this is being considered by National Grid.

For all of these reasons and although cumulative impact will need to be addressed in the planning application, based on the information available to the Council at present it is considered unlikely to lead to significant environmental effects in terms of the Regulations

Given the nature, scale and location of the proposal it is not anticipated to have any significant environmental effects in terms of use of natural resources, waste, heritage, pollution, flooding, population and human health, water resources, biodiversity, landscape and visual, transport/access, land use, land stability and climate change, nor will it result in a risk of major accidents/disasters.

For the reasons above it is considered that the development would not be likely to have EIA significant effects on the environment by virtue of factors such as its nature, size or location.

This judgement is based on the information provided with the Screening request and currently available to the Local Planning Authority.

Under regulation 6(9) it is hereby confirmed that in the opinion of the Local Planning Authority the above development is not EIA development in terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Yours faithfully,

X *B.J. Haywood*

Signed by: Ben Haywood
Head of Development Services