

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 07 June 2022 18:27:36

Application Reference No. : SMD/2022/0160 Site Address: Upper Newton Farm Draycott Road Upper Tean
Staffordshire ST10 4JN Stoke On Trent Comments by: Mark Johnson Moorlands Climate Action

From:
12
Hawthorn Terrace
Leek
Leek
Staffordshire
ST136AW

Phone:
Email:
Submission: Support
Comments:

Moorlands Climate Action is writing to express its support for the proposed solar energy farm under
SMD/2022/0610

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, and its promise to get the district to Net Zero by 2030.
- 2) The explicit commitment to 'promote the use of renewable energy' contained on page 22 of Part 2 Climate of the Action Plan.
- 3) The statement on Page 21 of the Part 2 of that document: 'The amount of renewable energy available in the district will increase to 110 MW by 2025 and 318 MW by 2030'.
- 4) 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.'
- 5) 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:'.
- 6) 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 is well designed and screened.
- c. The site is 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 application has the benefit of a guaranteed offer of connection to the National Grid. These are not easy to come by and that offer should weigh heavily in satisfying the 'location feasibility' condition for renewable energy set out in the penultimate point of SD2.
- g. The site has no particular landscape, habitat, or species designation. It is not in the Green Belt, or near any Area of Outstanding Natural Beauty nor National Park. Nor is it near any statutory Historic Monument.
- h. The project has a defined life cycle and can be returned to other uses once finished.
- i. The application has a biodiversity net gain of 69% (applicants own figures based on Defra Metrics)

SMDC's commitment to promoting renewable energy is clear. We argue that this specific application fulfils all the specific requirements set out in the Local Plan. To spurn a well thought-out and well-located proposal which would provide 7,000 homes in the Moorlands with low carbon electricity and save 5,600 tonnes of CO2 per annum seems inconceivable.

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>
