

SMDC Planning Reference –	SMD/2022/0343		
Site Name –	Totmonslow Farm Solar Facility		
Summary of proposals -	Photo voltaic array facility with control equipment		
Consultation Note Subject –	Landscape and Visual Matters		
Planning Case Officer –	Arne Swithenbank		
Landscape Comments Prepared By –	Stuart Ryder of Ryder Landscape Consultants		
Date of site visit —	2/9/22	Date of response	22/9/22
Recommendation –	Seek Clarification – Of proposed landscape mitigation measures / treatment near footpath / cumulative effects from A50		

Dear Arne

Totmonslow Farm Solar Facility – Landscape and Visual Consultation

Thank you for appointing us to review the landscape and visual aspects of the submitted planning application and I pass a series of comments under the following headings;

1. Methodology
2. Site and surrounding's landscape character
3. Proposals for the site
4. Landscape effects
5. Visual effects from surrounding areas
6. Compound effects
7. Potential design considerations
8. Landscape Policy Compliance
9. Suggested Planning Conditions

1. Methodology

Staffordshire Moorlands District Council (SMDC) appointed Ryder Landscape Consultants to consider the submitted scheme and supporting documents in August 2022. Stuart Ryder an experienced Chartered Landscape Architect attended site on 2nd September 2022, walked nearby public footpaths and highway corridors and took site photography.

The site visit was unaccompanied, but I had the following plans and report to inform me about the proposals;

- Unnamed – Site Location Plan 1107_01 Re2 dated July 2022
- Renergy Engineering – Preliminary Design Rev R03 dated 31/3/22
- Ubu Design - LVIA material
- Unnamed – Landscape and ecology mitigations and enhancements plan – 1107_11, 1107_11A and 1107_11B – all Rev 1 and all dated April 2022
- Photomontage representations.

2. Site and surrounding's landscape character

The site is comprised of a series of pasture fields (13 counted off plan) put to improved grass set to the north side of the A50 but south of the Draycott Road. Construction access is proposed from the north off Draycott Road via an existing track past a small clutch of houses. The topography of the Site is varied but largely relates to the Blithe Valley to the south. This collection of fields is on the 'watershed' or cusp of the two valleys in this part of the District. To the south lies the Blithe and to the north the Tean.

The most notable characteristic of this group of fields is their small size and demarcation by full hedgerows. The field size, particularly when compared to other larger amalgamated fields nearby provides a positive landscape feature that should be conserved. The hedgerows when viewed from ground level on Site provide good visual containment and compartmentalisation between fields.

Other Site features include a small area of woodland towards the centre of the proposed Site, mature hedgerow standard trees and a series of field ponds typically surrounded by further tree growth. Crossing the north eastern field is a high voltage overhead transmission line but no pylons appear to be set within the red line boundary.

The contextual area to the proposals if summarised using the cardinal points are;

- North – rural area with some dispersed settlement leading down into the Tean Valley towards the small town of Upper Tean.
- East – rural area with a mix of medium sized, hedged fields put to both arable and pastoral use.
- South – A50 major road corridor part set in cutting and part on embankment with associated highway planting, to the south of the A50 lies the Blythe Farm PV facility.
- West - rural area with a mix of medium sized, hedged fields put to both arable and pastoral use leading to the Blithe Valley which is largely rural in character with dispersed settlement.

Typical boundaries to the fields in the contextual area are native hedgerows with mature hedgerow trees reinforced in places by timber post and agricultural mesh fences. Some of the hedgerows may be Important Hedgerows under the Hedgerow Regulations given their position between Parishes.

There are a number of public footpaths near to and adjacent to Site. These include Checkley 4 that leads onto Draycott in the Moors 32 along the northern side of the Site and Checkley 5 to the east of the Site.

The Wardell Armstrong 2008 Landscape Character and Settlement Assessment study shows no landscape constraints on the Site or in its contextual area. The Site is classified as being part of the Settled Plateau Farmland Slopes Landscape Character Type (LCT).

In landscape character terms there is both connectivity with and influences of the A50 road corridor and the rural landscape however the overall landscape character is however rural pastoral fields. There are no structures on Site but a farm and converted barn complex at Highlands Farm is in close proximity to the south east corner of the scheme.

Totmonslow Farm itself is a handsome three storey farm house set off Draycott Road to the south of the proposals and has no direct physical or visual relationship with the Site.

I would not class the Site as a 'valued landscape' as per NPPF Para 174 a) but its hedgerow pattern is of value and its long term preservation as hedgerow is critical to sustaining landscape character in the area.

3. Proposals for the Site

Access is proposed from the NW corner of the Site utilising the farm track that Drayton in the Moors Footpath 15 follows. An existing field gate is identified as the point of access but this is the route of a footpath (believed to be Draycott in the Moors FP27) that is indicated on General Layout drawing as running down the former railway line. This is one of two potential footpath / proposals discrepancies identified during the Site visit.

The first field reached would have two sub-stations, one is labelled as DNO and the other as Customer.

An internal road is indicated running from the access point to snake around the various central fields to provide access to the series of small fields. It is not indicated on the plan what type of surfacing is proposed, if any at all but its removal on cessation of PV operations should be Conditioned if you are minded to grant consent. The internal road does not reach two fields to the south adjacent to the A50, nor the most easterly near Highfields Farm. It is unclear how construction and operational access would be taken to these 'outlying' fields.

The other point to query with regard to the access road is how much, if any hedgerow has to be removed at the numerous 'hedge crossing points' particularly for construction access.

Every field unit with the redline boundary is proposed to receive PV arrays. The filling of the fields appear total with no spaces for mitigation habitat, increased screening or stand-offs from residential properties such as Highlands Farm.

Clearance of existing trees, hedgerows and central small wood appear not to be required with the caveat placed to this comment that new, or widened hedge openings may be required to allow the access road to run around the Site including the fields not currently linked. The proposals also appear to respect the existing farm ponds that are on Site.

Surrounding each set of arrays in each field is set a fence, presumably a deer-stop fence that has become the de facto treatment for solar parks. It is questioned why every field of arrays requires fencing when many are away from public access routes and could rely on the existing hedgerows as barriers.

The proposals as shown on the Landscape and ecology mitigations and enhancements plans (1107_11 series) are not sufficient to form a judgement upon. They are not readily transferable to what occurs where on the ground and should be placed on OS or topographical bases to allow comparison to what is already present. There is also the need to describe initial establishment and ongoing maintenance of new and existing landscape features thoroughly so they can be taken into account in the determination of the application and if you are minded to grant consent allow ready Conditions to be prepared.

An '*Area to be managed for biodiversity*' is indicated on the 1107_11 plans but does not appear on the General Layout 1107_02 drawing.

4. Landscape effects

The proposals will effectively turn the collection of fields into a solar park and this change can only be classified as a **Major, Adverse and Temporary** effect that is an inevitability of development. It is classed as Temporary as it is assumed that the development will be granted under licence for a period of 25 years or similar. This temporal period will be perceived as **Permanent** by human receptors who pass by the Site but in landscape terms can be classed as Temporary particularly given the ease of reversibility with regards to the fixtures and fittings of a PV Site. The proposals are not considered in keeping with the wider pastoral landscape character of the Settled Plateau Farmland Slopes but there is the existing Blythe Farm PV facility nearby providing some local context for the proposals.

The ability to retain the existing hedgerow network as a multitude of strong planting buffers is acknowledged and in reality the numerous hedgerows will likely screen views to the PV arrays from the outset as discussed further in the visual effects section below. The point of greater landscape concern however is what state the hedgerows are likely to be in with the adjacent land use changing from agricultural to energy production. The former requires regular hedgerow maintenance (cutting and shaping) which the latter does not. The Applicant should explain by way of detailed landscape management proposals how they are proposing to keep the hedgerows within and around the Site as

hedgerows rather than overgrown, straggly tree lines. This same concern about the field ponds can be expressed because they too can succeed to woody areas without ongoing management.

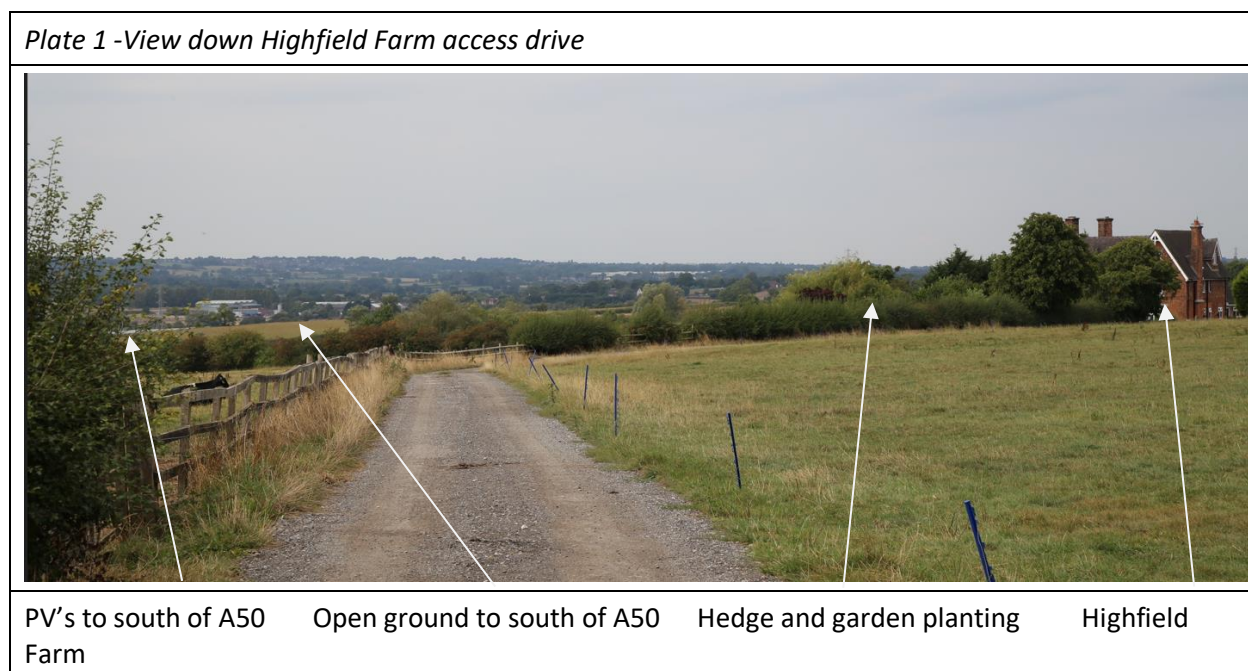
There is only a limited area of bio-diversity creation indicated and not shown at all on the General Layout. The retention of hedgerows and trees on Site cannot be classed as a Biodiversity Net Gain (BNG) however new hedgerow planting can. Allowing grazing swards to grow up around the arrays is not necessarily a BNG either without some form of species or management change that actually promotes a more varied, grass and wildflower sward.

5. Visual effects from surrounding areas

The Site is visible in parts from public footpaths to the north, east and from the A50 to the south. Of these it is walkers on Checkley 4 / Draycott in the Moors 32 & 27 that have the longer duration and closer view whilst vehicle users on the A50 to the south have shorter kinetic views. There will also be visual change for the residents of the Highfield Farm complex with the arrays set to the west of their properties. The discussions are split into Footpaths, A50 and Residential Visual Receptors.

Footpaths

Checkley FP5 is set along a surfaced farm access track to the east of the Site and a view down to Highfield Farm is gained down the access drive to the farm. The buildings are set with a reasonable hedge and garden planting screen facing eastwards but access onto the private land was not taken to see if there were open views to the west from the rear of these properties. It is considered unlikely that there will be any extensive views to the Totmonslow Farm PV Facility for users of this path however there may be an increased ability to see the arrays in the winter months. Path users are more likely to see the extension to the Blyth Farm PV facility set to the south side of the A50. This is judged on the fact that open ground to the south of the A50 is visible currently as are existing PV arrays on lower ground. This would be a suitable place to consider cumulative visual effects.



Checkley FP4 – Is the location where there appears to be a discrepancy between the definitive plan and physical routing on the ground. This footpath routes up towards the corner of the eastern most field and then through the field to exit into another large pasture field, this time with pylons in. Whereas the

General Layout plan 1107_02 and the landscape plan 1107_01 Rev 1 have the PRoW outside of the field rather than ‘nibbing’ it’s corner off as occurs on the ground. This would mean the actual physical PRoW would pass through a field with solar arrays within it. This field is also different to the majority of the southern and western fields whose topographical fall is towards the Blithe Valley as it’s slopes towards the Tean Valley. It is in fact the Tean Valley and Upper Tean itself that provides visual interest for users of this path particularly when walking west to east.

<i>Plate 2 – Access onto eastern field from east</i>	<i>Plate 3 – Within eastern field looking west</i>
	
Double stile arrangement into field.	Route across field corner
<i>Plate 4 – Attractive views into Tean Valley from elevated position</i>	
	
Views to Tean Valley	Access point into eastern field
Sparse boundary hedge	

Unfortunately, the attractive view to the Team Valley occurs where the eastern field’s northern boundary hedge is sparse. The presence of end on views to the PV arrays will notably detract from the quality of the view from Checkley 5. Restoration of the boundary hedge is one solution to provide more visual screening but this would not address the need to revise footpath routes in this area.

There is also the landscape question to consider with regards to the PV arrays running over the top of the local watershed between valleys and exerting an influence on the Tean Valley where no such installations are visible from the surrounding area unlike the Blithe Valley.

Whatever landscape treatment of this part of the Site is proposed (cannot be discerned from the landscape drawings) the Applicant should be requested to definitively confirm the route of the footpath on the ground compared to the Definitive Map and what their intentions are to its final position on or around the Site.

Draycott in the Moors FPs32 & 27 are continuations of Checkley FP4 and run close to the Site with the adjacent boundary hedgerow screening the majority of views to the PV arrays. There are breaks and gaps in the hedgerow where close range sight of the PV arrays will be available particularly in winter months with less foliage screening,

<i>Plate 5 – Full hedgerow</i>	<i>Plate 6 – Hedgerow gap</i>
	
Generally full hedges line the route of FPs 32 & 27	Where gaps occur there will be clear sight into the adjacent PV fields

There is a further potential footpath route discrepancy on this path with it routed through the entrance field exiting it at a stile adjacent to the Site entrance. The proposal drawings appear to have it routing along the former railway line.

<i>Plate 7 – Footpath exiting access field</i>	<i>Plate 8 – Former railway line</i>
	
Site notice fixed to access gate with PRow marker and stile indicating on the ground route	Former railway line that leads back towards Upper Tean.

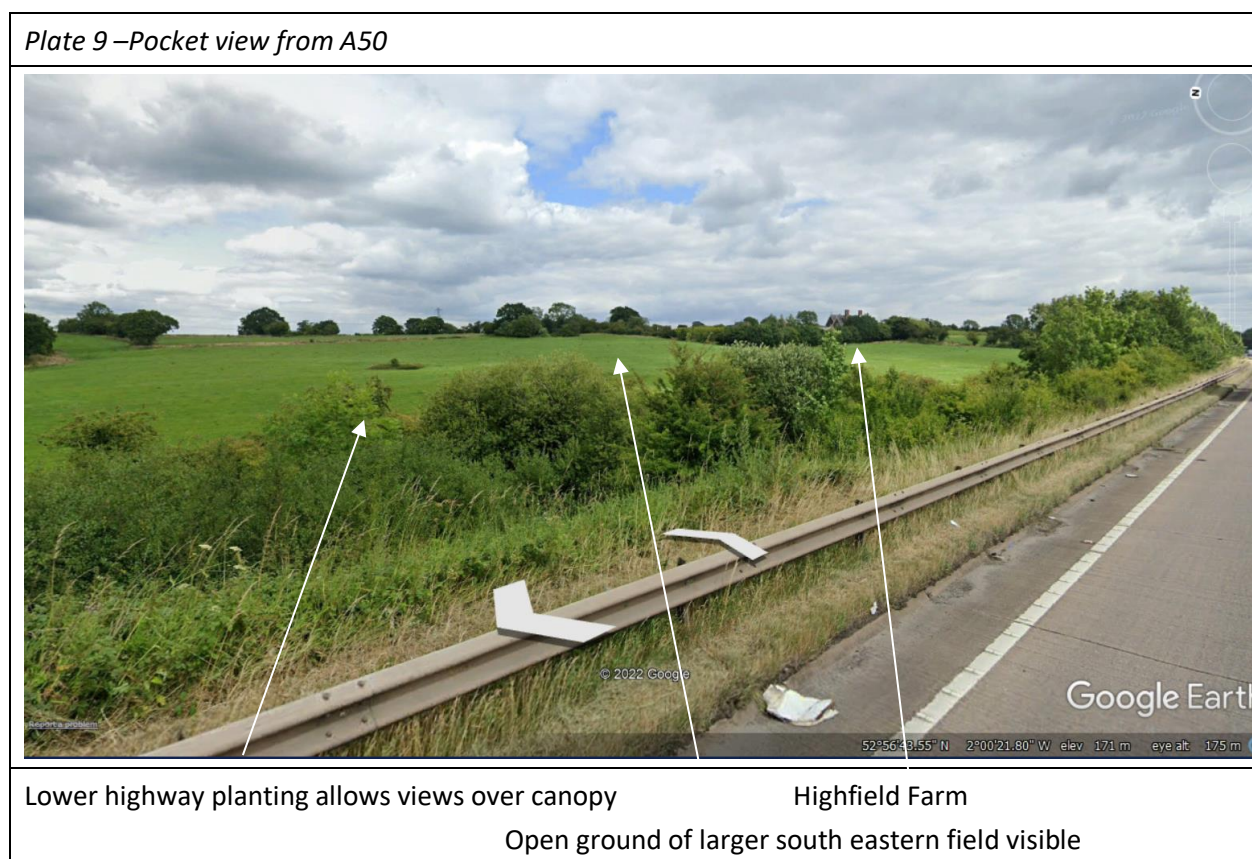
Final footpath comments relate to creating a 6m wide walking corridor (see 1107_11A Rev 1). Walkers would prefer to walk with longer, more open views and placing footpaths in visually constrained corridors is a less enjoyable walking experience than being at a field edge with longer views. As there is

footpath uncertainty in this area it could be that path routes could be modified to retain as much of an open view as possible.

A50

This important transport route allows a view to be taken to the raising ground to the north of the A50 where highway planting is thin and before the local cutting is entered into. Even though a fleeting view it will allow understanding that there is a PV facility to that side of the A50. The landscape proposals do not show any additional screen planting to reduce sight into the south eastern PV field. The view is limited in duration given the speed of the A50 road users and most of the route past the PV facility is either screened by highway planting, embankment cutting or both. However the sudden appearance of the view to east bound travellers will add a 'surprise' element to the unexpected feature adding to its notability.

Plate 9 below is an extract from Google Earth and even taking into account the higher eyeline of the camera at 2.4m there is still a clearly visible view into the lower south eastern field running up to Highlands Farm on the skyline.



Screen planting of this view is recommended, possibly with quick growing tree species set off the highway land and within the field margin. If they are considered to cast too much shade on the PV's the shaded area could be a further BNG area.

Residential visual receptors

Residents of the Highland Farm group of buildings made up of Highfield Farm, Horseshoe Barn and The Old Barn appear to have a mix of boundary treatments set around the edge of their curtilage when viewed on aerial photography. The greatest amount of planting is set to the south west boundary facing the primary distraction in the locality which will be noise and possible visible traffic movement on the

A50. The least amount appears to be on the north west facing boundary with intermittent hedge and planting groups. The visual effect of the PV arrays positioned close to these two boundaries can only be judged on Site and this is a private view so was not taken in my field survey. I recommend you as a Planning Officer take this view to determine what effects, if any occur to the residential amenity of these properties. The view will exist from the garden spaces around the properties and from first floor level rooms facing south and west.

If the PV arrays are considered to be too incongruous or overpowering to the outlook and setting of these homes there is sufficient space within the field to develop a suitably sized stand-off, possibly planted and still retain a large area of PV's.



In considering the comments from the ubu Design LVIA at §5.33 it states that there would be Minor significant effects on completion and rather confusingly Minor / Moderate (a greater level of effect) on establishment of the mitigation planting. This level of visual change to residential amenity may be correct but I cannot definitively comment on it as I have not taken the view in either direction.

6. Cumulative effects

There are two sets of cumulative effects to consider. The first with the existing Blythe Farm PV facility (SMD/2014/0197) and the second with the potentially extended Blythe Farm PV facility (SMD/2022/0160). Realistically there is only the A50 where both facilities can be seen from a close distance and possibly from the access drive to Highlands Farm.

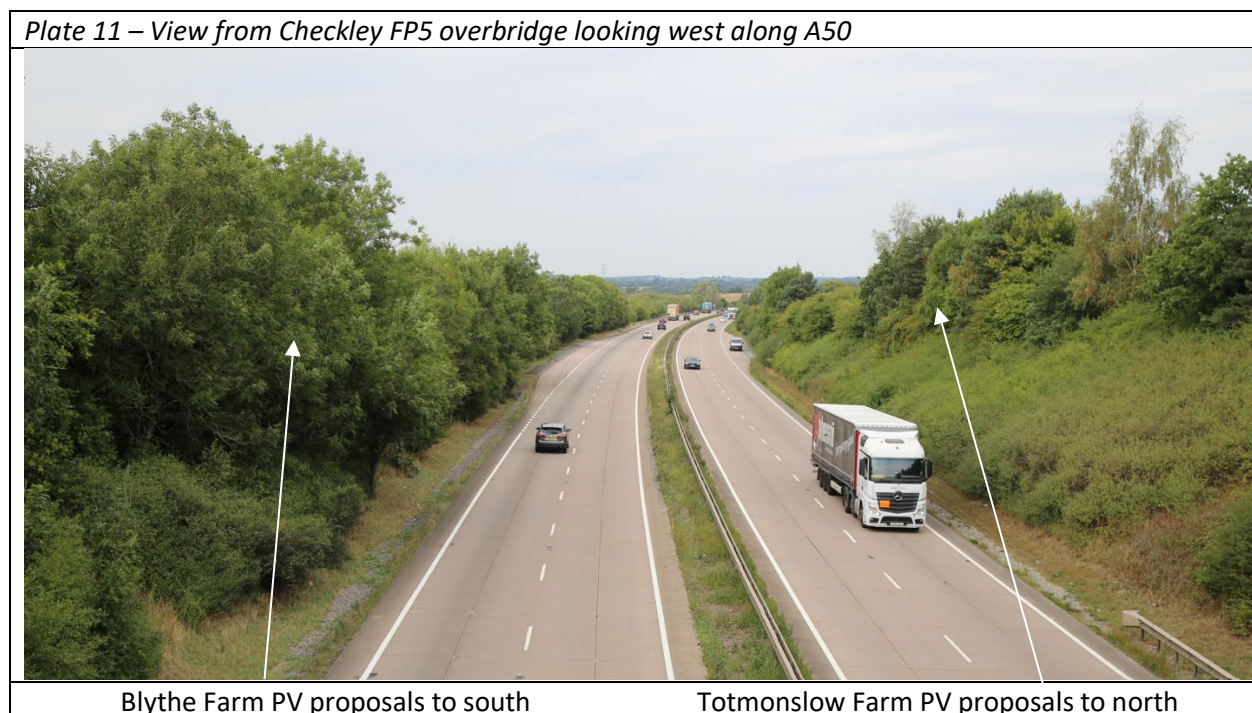
The ubu LVIA reports on cumulative effects at Section 7 and does identify the existing and pending consents. However it is not definitive in its comments and reports cumulative effects are 'unlikely'.

Further information on the likelihood of seeing both solar parks on either side of the A50 would be useful in the determination of this application.

The points that I think are relevant to considering this effect are;

- That there is generally a good screen of either highway planting or embankment cutting along this stretch of the A50 which restricts site to both the north and south;
- This screen is not however total so some sight of the PV arrays should be anticipated;
- The screening value of the highway planting has not been assessed in winter conditions;
- That westbound travellers on the A50 are more likely to see the Blythe Farm solar park in its current and potentially expanded state than eastbound travellers;
- That eastbound travellers on the A50 are more likely to see the PV arrays leading up to Highfield Farm than westbound travellers;
- That even though it is not certain that both schemes will be visible at the same time from the A50 the physical and temporal proximity of views will mark both sides of the road as having solar parks, this in turn will increase the sense of size for both facilities and perception of landscape character change.

To assist in your decision making process I would recommend driving both ways on the A50 to understand how much open ground in the fields are currently visible as this would change to PV arrays until any screening takes effect. In addition standing on the overbridge that Checkley FP5 uses to cross the A50 is useful to understand the rise and fall of embankments, cuttings and the levels of the proposed array fields.



In addition to the close range cumulative effects there may be longer views from the south side of the Blithe Valley. The ridge that runs from Spot Acre to Middleton Green is high enough to possibly allow views to both solar parks and the A50 would no longer be visible or act as a divide. The scale of the two parks in the view would be small and set within a wider panoramic scene. Cumulative visual effects are considered to be Minor, Adverse where they exist.

7. Potential design amendments

The following summary of potential design amendments are given as a way of improving the landscape and visual aspect of the proposals. Their adoption should be sought if you are minded to consent the proposals.

- Modification of the proposals in the eastern most field that faces into the Tean valley so that the footpath route is satisfactorily addressed and the view into the valley is not degraded by the PV arrays.
- Confirmation of long-term management of valuable landscape features (also ecological assets) of hedgerows, field ponds and conversion of nutrient rich mono-culture grass sward to the varied wildflower meadow as indicated;
- Screening to the south eastern field to reduce view to PV arrays from the A50;
- Confirmation of proposed footpath routes at the eastern most field and the access field and comparison to what is waymarked on the ground and what is shown on the Staffordshire Definitive Plan;
- Diverting footpath alignment to keep open views across fields rather than constraining into visually narrow corridors;
- Confirming the positions and widths of the access route through the various hedgerows including how the fields where it does not apparently run are accessed;
- Provision of increased stand-off and screen planting to the Highlands Farm interface to the south east of the scheme; and
- Increase in the number and therefore size of BNG areas that appear to be minimal compared to the scale of the PV park.

These design amendments should be shown on scheme bases that allow their consideration with existing site features. In addition a Landscape Maintenance and Management Plan (LMMP) will be required so the initial establishment and ongoing upkeep of the various landscape features and ecological habitats can be confirmed and Conditioned.

8. Landscape Policy Compliance

The SMDC landscape planning policies that need to be considered are;

SS11 – Churnet Valley Strategy

Not applicable.

DC3 – Landscape and Settlement Setting

This is the main landscape focussed policy of the Local Plan that seeks to protect and where possible enhance local landscape. The five parts to its policy box are set below and considered in turn;

1. Resisting development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into and out of the settlement as identified in the Landscape and Settlement Character evidence.

There would be intrusion arising from the new facility but it is not considered prominent with the view from the A50 the primary source of visual intrusion and this can be partly if not totally screened. The proposals do not affect the setting of any settlement.

Conflict with Part 1 of the policy has been found but not at a significant scale.

2. Supporting development which respects and enhances local landscape character and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character evidence.

The proposals respect the hedgerow and tree planting pattern on Site but as of yet cannot be classed as enhancing local landscape character but rather detracting from it. Reinforcement and enhancement of settlement setting does not apply. With further reassurances of how the hedgerows and field ponds will be managed and how BNG will be delivered the long term landscape character of the area could be respected so at a point when the arrays are removed the rural landscape is returned to the same and possibly improved character.

Likely conflict with Part 2 of the policy but confirmation of management through LMMP would address this conflict.

3. Supporting developments which conserve or enhance the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds.

The proposed field sward diversification and the current small amount of hedgerow planting and biodiversity would all comply with this part of the policy but the scale of the proposed works are considered minor to negligible at the moment. Their long-term establishment and ecological contribution will need to be delivered through an appropriate landscape management and maintenance plan.

Likely compliance with Part 3 subject to confirmation of management through LMMP.

4. Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape.

The sustainable building techniques could be applied to the demountability of the scheme and ease of removal should the proposals become defunct or superfluous to the power grid. The materials and building form, particularly of PV arrays and extensive deer fencing, are clearly not sympathetic to the landscape when compared to traditional materials and rural land uses in the area.

Conflict with Part 4 even though this part of the policy does not appear to be strongly applicable to the proposals.

5. Ensuring that development does not adversely affect the wider setting of the Peak District National Park.

This part of the policy is not applicable to these proposals as the site is not in the PDNP setting.

Not applicable.

In considering DC3 as a whole there is more conflict than compliance. However there also appears to be the opportunity to improve the landscape and visual effects of the scheme so that it would be possible to demonstrate clear compliance with Parts 1,2 & 3 and therefore the wider policy as a whole.

NE2 – Tree, Woodland and Hedgerows

This three-part policy is aimed to ‘*protect existing trees, woodlands and hedgerows, in particular, ancient woodland, veteran trees and ancient or species-rich hedgerows from loss or deterioration.*’

The first part that seeks the integration of trees, woodlands and hedgerows on site unless their removal clearly outweighs their loss is complied with by the retention of field boundary hedgerow and trees. It would however be useful to understand fully the potential effect the access track would have on the individual hedgerows.

Part 1 - Compliance.

The second part seeks new tree planting associated with development that this scheme could demonstrate more than is currently indicated. It is recognised that trees can shade solar arrays so their positioning has to be carefully chosen the north side of fields or where they are required to perform other functions such as screening to the A50 or near Highfields House.

There is also the opportunity to address ash die-back disease by felling infected ash trees and replacing them with a locally appropriate and more disease resistant tree species. The proposed species, size at planting and planting densities all will require further information in detailed proposals.

Part 2 – Part - Compliance.

The third and final part of the policy addresses the retention of ancient woodland, veteran trees and ancient or species rich hedgerows. The hedgerows and associated trees around the Site are retained around the Site but confirmation of root protection areas and avoidance of excavations e.g. cable runs that could affect the tree and hedge roots is recommended if not already submitted.

Part 3 – Compliance.

9. Suggested planning conditions

There is clear landscape and visual harm to be put in the planning balance but should you be minded to grant planning consent and notwithstanding the already submitted landscape proposals the following Planning Conditions are suggested;

- A. That a detailed hard and soft landscape mitigation scheme is submitted for consideration.
Reason – to ensure that the proposals maintain the boundary character and respect the neighbouring landscape.
- B. The soft landscape proposals should be implemented in the first growing season after construction has commenced and replacement of dead, diseased or dying stock should be undertaken in accordance with a Landscape Maintenance and Management Plan. *Reason – to ensure the quality of the landscape mitigation measures.*
- C. That no tree felling is undertaken on , or excavation within root protection areas, without the express written agreement of SMDC's Arboricultural Officer and after consideration of tree sensitive construction processes – *Reason to protect the mature tree and hedge stock that contributes to the local landscape.*
- D. That a Landscape Maintenance and Management Plan (LMMP) is prepared for implementation by the site owners / tenants for the full operational life of the facility and that an arrangement for continuation of the LMMP by future owners is entered into – *Reason – to reflect the importance of the soft landscape mitigation proposals for the local landscape character.*
- E. Low light level scheme – *Reason – to reduce the intrusive nature of lighting in the rural landscape in the hours of darkness.*
- F. That a schedule of works activities in the form of a site restoration plan is produced to explain the removal of arrays, ancillary equipment and tracks as part of full restoration of the site back to pasture fields is submitted for agreement with SMDC prior to the Site becoming operational –

Reason to protect local landscape character and rural amenity on the cessation of use as a power storage park.

I recognise that the suggested conditions could possibly be combined with others that you may be considering and will require careful re-wording to be enforceable but wished to explain the reasoning behind them.

I trust you find these comments useful as you consider the determination of this application and I can forward further photography from my site visit for your Officer Report. Should you have any queries please do not hesitate to contact me.

Stuart Ryder

22/9/22