



Third Revolution Projects

Totmonslow Solar Farm

Summary of Changes Made to the Proposed Development



Applicant: RE Projects Development Ltd

April 2023

1. Introduction

This planning summary document accompanies the resubmission of a planning application for:

“Temporary development of a solar farm with ancillary infrastructure, security fence, access, landscaping and continued agriculture, to generate power to feed into the local distribution network.”

The purpose of this document is to summarise the amendments and to provide planning commentary on how the proposed amendments satisfy the reasons for refusal. It should be read alongside the drawings, Planning Statement and supporting documents.

The application site is located on land between the settlement of Draycott in the Moors and Upper Tean, in Staffordshire Moorlands, ST10 4JJ. This includes land for landscaping and biodiversity measures with the total area used for solar being around 27.7 hectares.

Application reference number SMD/2022/0343 was refused at committee on 23 February 2023 for the following reasons:

“1. Due to its design characteristics, scale and extent in the landscape the proposed development of a c.38 hectare solar energy generation site using photo-voltaic panels mounted on metal frame support structures would have an industrialising effect which would not maintain the local distinctiveness of the character of the area and fails to protect and enhance the natural and historic environment. The close proximity with a nearby existing similar development and a second one of similar scale recently approved means moreover that these effects would be experienced cumulatively in the local area. Notwithstanding its predicted significant renewable energy output the proposal is therefore found contrary to policies SS1, SS10, DC1, DC3 and SD2 of the Staffordshire Moorlands Local Plan and to the NPPF

2. The proximity of the development to certain residential dwellings in particular three dwellings at Highfields Farm, and of these especially Horseshoe Barn, would result in a very intrusive and oppressive visual intrusion resulting in unacceptable living conditions for the occupiers. In addition there is uncertainty as to how CCTV surveillance and noise impacts could be experienced at these dwellings. For these reasons the development is found contrary to SS1, SS10, DC1 and SD2 of the Staffordshire Moorlands Local Plan.”

2. Proposed development amendments

Comments received from the local community and planning committee, which led to the refusal of the previous application, have been taken on board by the applicant. They have undertaken the following new and updated survey work:

- Updated Landscape and Visual Impact Assessment, including cumulative impact assessment – Ubu Landscape Design, LVIA02 April 2023.
- Updated Cultural Heritage Impact Assessment – Abrams 00123, 1.4, April 2023.
- Updated Preliminary Ecological Appraisal – Phlorum 10669 Rev 3, March 2023.
- Updated Ecological Enhancement, Mitigation and Management Plan – Phlorum 10669 Rev 2, March 2023.

- Updated Biodiversity Net Gain Assessment – Phlorum 10669 Rev2.
- Protected species surveys:
 - Updated National Vegetation Classification Survey – Phlorum 10669.
 - **New** Breeding Bird Surveys – currently being undertaken by Enzygo with report to follow.
- Photomontages
 - Updated Viewpoint 03 (very minor change resulting from proposed changes).
 - Viewpoint 04 (unaffected by proposed changes).
 - **New** Viewpoint B from Old Barn (Figure 2).
 - **New** Viewpoint A from Horseshoe Barn (Figure 3).
- Updated Flood Risk Assessment and Drainage Strategy – Hydrock 20399-HYD-XX-XX-RP-FR-0001, 4 April 2023.
- Update Agricultural Land Classification (ALC) Survey – Land Research Associates 1885/2, 23 March 2023.
- Updated Transport and Access Statement – Apex Transport Planning C21075/TS02, 30 March 2023.
- **New** Construction Traffic Management Plan – Apex Transport Planning C21075/CTMP01, 30 March 2023.
- Updated Noise Impact Assessment – Hepworth Acoustics P22-471-R02v2, March 2023.
- Updated Glint and Glare Assessment – PagerPower 12009A Rev 5, March 2023.
- Topographical Survey – Parish Land Surveys, PLS-902, October 2021.
- Updated Arboricultural Appraisal – Salopian Consultancy SC:510 AA_V4, 19 April 2023. Contains:
 - Arboricultural Impact Assessment.
 - Tree Survey.
 - Arboricultural Method Statement.
 - Tree Constraints and Tree Protection Plans.
- Updated Site Search – Third Revolution 1107_Site Search, April 2023.
- **New** Planning Design and Access Statement – Third Revolution 1107_PDAS, April 2023.
- Updated Environmental and Community Benefits Proposals – Third Revolution 1107_ECB, April 2023.
- **New** Statement of Community Involvement – Lexington, April 2023.

These have been used to make important amendments to the proposals. These are summarised below and detail provided later in the report:

- The layout has been revised to remove part of the two southern fields, bordering properties at Highfields Farm to further reduce the impact on privacy and quality of life of these residents. A new double thickness hedge planted with semi-mature native species (planted at approximately 1m high) will provide more rapid and year-round screening from residential properties. It will help screen the development from the start of operation and mature to the shown extent within 3-5 years of energisation of the project. The views from the rear of properties at Highfields Farm (Old barn and Horseshoe Barn) following this change can be seen in the updated layout Figure 1 and Photomontages Figure 2 and Figure 3.
- Inverters and transformers are at least 200m from the nearest property so the development will not be audible.

- CCTV cameras have been positioned away from properties. They will be directed into the site and along the boundaries and will not capture images of nearby properties, users of the Public Rights of Way (PRoW) or surrounding areas.
- Undertaken more detailed ecological surveys and prepared an Ecological Enhancement, Mitigation and Management Plan (EEMMP), which describes how the hedges, trees and other habitats will be managed for the duration of the project.
- Off-site mitigation area was proposed for breeding birds as shown in Figure 4, which may be used if the ongoing breeding bird surveys confirm the need.
- Detailed analysis of the alignment of the footpaths has been undertaken and reflected in the layout. Figure 1 shows an alignment that corresponds with the definitive plan so that no trees or hedges will need to be removed and pruning and root protection area intrusion kept to a minimum.
- Although the proposed number of solar panels has decreased, the energy capacity has been maintained (15MW export / 19.82MWp) which will enable the generation of clean renewable energy contributing to the British Energy Supply's Strategy's ambition for a five-fold increase in new solar power by 2035. This has been achieved by positioning the solar arrays closer together.
- The applicant has undertaken further work to minimise impacts of construction traffic, cumulative impacts with nearby solar farms, and glint and glare.



Figure 1 – Proposed amended layout (drawing 1107_02 Rev 12) and pull-out showing changes made from refused scheme (planning reference: SMD/2022/0343, drawing 1107_02 Rev 07)



Figure 2 - Photomontage showing the development from rear of Old Barn at year 1 with semi-mature hedges planted at approximately 1m tall (top image) and after maturity of the new semi-mature hedging after approximately 5-years (lower image)



Figure 3 - Photomontage showing the development from rear of Horseshoe Barn at year 1 with semi-mature hedges planted at approximately 1m tall (top image) and after maturity of the new hedging after approximately 5-years (lower image)



Figure 4 - Updated Mitigation and Enhancement Plan (1107_12 Rev 5) which replaces 1107_12 Rev 4

3. Appraisal against reasons for refusal

The following table provides an overview of the reasons for refusal, key resident and planning committee comments and demonstrates how these have been addressed in the resubmitted application.

Reasons for refusal	
The proposed development would have an industrialising effect	<p>The applicant does not consider the proposed scheme to have an industrialising effect on the local landscape. It has been established by other local authorities that solar farms can be considered ‘semi-rural’ as opposed to an ‘urban’ or ‘industrial’ form of development (e.g. 22/01816/FUL - Land to the West of County Lane Albrighton Shropshire), while appeal reference 3304561 concludes that the existing and proposed landscape features around the site would limit the industrialising effects of the solar farm.</p> <p>In the case of Totmonslow, the development does not contain large buildings, is low to the ground and space is left between and around the solar arrays. They are more like greenhouses than industrial units.</p> <p>Ultimately, the location has been determined by a careful site search (1107_Site Search, April 2023) around the available grid connection and a reasonably well screened chosen where additional screening will contain the effect on the landscape to a localised area (see below).</p>
The proposed development would not maintain the local distinctiveness of the character of the area	<p>The LPA’s landscape advisor concluded that the original scheme would detract from local landscape character but that following removal of the solar farm, character would be returned, so long as hedges and ponds were well managed.</p> <p>The original LVIA (Ubu, Rev A, Jan 2023, Totmonslow_LVIA01_A) did not disagree with this but concluded that the <i>“residual effects on the landscape will not exceed minor moderate in terms of the site, its setting and the broad landscape character and therefore the effects are not considered to be significant.”</i> (8.5)</p> <p>For the proposed submission, an updated LVIA (Ubu Landscape Design, LVIA02) has been prepared to address the following:</p> <ul style="list-style-type: none"> ▪ More detailed baseline analysis. ▪ Detail of the experience of users of the footpaths and confirmation of footpath alignment. ▪ Consideration of effects of construction phase. ▪ More detailed cumulative impacts assessment. ▪ Detailed analysis on landscape visual and residential receptors. ▪ Updated consideration of winter views.

	<ul style="list-style-type: none"> ▪ New viewpoints and photomontages from Old barn and Horseshoe Barn (Figure 2 and Figure 3). ▪ Review of the proposals to inform design response to landscape character. <p>Mitigation measures such as new native hedging along the PRow will soften the effects of the proximity of the panels to the footpaths. Drawing 1107_12 Rev 5 and the EEMMP (Phlorum 10669 Rev 2, March 2023) show how habitats will be protected, including features important to landscape character such as trees and hedges.</p> <p>Recent appeal decisions have reinforced that significant weight should be applied in decision-making to climate change, generation of renewable energy and biodiversity net gain and that these can outweigh landscape harm (e.g. appeal references 3293667 and 3292579). The applicant considers that this should be the case at Totmonslow, particularly as the harm to landscape receptors and setting is assessed as no greater than minor moderate adverse during operation and therefore below the threshold of significance.</p>
The proposed development fails to protect and enhance the historic environment.	<p>The updated Heritage Impact Assessment, prepared by Abrams Archaeology (00123, 1.4, April 2023), concluded that the proposed development will have only a minimal impact to one heritage asset, and this is outweighed by the significant benefits of the project. Any potential harm arising from post determination archaeological evaluation can be appropriately mitigated.</p> <p>The proposal is in accordance with the guidance relating to historic environment in the NPPF and Local Plan Policy DC2 in that it succeeds in protecting and enhancing the surrounding historic environment.</p>
The close proximity with a nearby existing similar development and a second one of similar scale recently approved means moreover that these effects would be experienced cumulatively in the local area.	<p>The original LVIA (Ubu, Rev A, Jan 2023) included a cumulative assessment and the Officer Report concluded impacts to be low or negligible (7.31).</p> <p>The updated LVIA (LVIA02) studied the impacts in greater detail, including adding a winter viewpoint from Blythe Valley, and concludes that the addition of the proposed development would not be significant and changes to the overall landscape character would be minimal.</p> <p>The site is visually contained by dense mature hedgerows and trees, especially along the A50 which will visually separate the sites and it was concluded that there would be no, or extremely limited visibility of the proposed development – this can be seen in the cumulative ZTV within the LVIA.</p> <p>The change in land use will influence the overall landscape character as described in the Council's LCA publications however, these were written before the introduction of the Blythe Valley Solar Farm and need to be considered as an emerging feature in all landscape throughout the country. In terms of cumulative effects on the broader landscape</p>

	<p>character this will still remain at the lower end of significance considering the majority of the landscape within the LCA will retain the key characteristics and be consistent with the descriptions that contribute to the overall character.</p> <p>There are no public viewpoints from which the sites would be visible simultaneously. Extensive field study has been carried out on the footpath receptors in this region and concluded that there will be little to no visual connection of significance due to the distance and intervening landform and vegetation within the landscape. It is also unlikely that there would be any inter-visibility between the proposed developments.</p> <p>Therefore, the cumulative effects would be negligible.</p>
The proximity of the development to certain residential dwellings in particular three properties at Highfields Farm, and of these especially Horseshoe Barn, would result in a very intrusive and oppressive visual intrusion	<p>To address concerns about proximity to residents, the proposed application now shows a setback of 120m from the boundary with properties at Horseshoe Barn (at least 140m from the nearest house) – see Figure 1.</p> <p>Additionally, a new double thickness hedge planted with semi-mature native species to provide more rapid and year-round screening (1107_12 Rev5).</p> <p>The effect of this change can be seen in the photomontages (Figure 2 and Figure 3).</p> <p>As such, the development will not be intrusive, create an oppressive visual intrusion or result in unacceptable living conditions for the occupiers of nearby properties.</p>
Noise impacts	<p>The amended layout has addressed any residual noise impact to neighbouring residents. This has been confirmed by the updated Noise Impact Assessment, prepared by Hepworth Acoustics (P22-471-R02v2, March 2023).</p> <p>Solar panels themselves do not generate noise.</p> <p>Inverters have been positioned approximately 206m from the nearest property Horseshoe Barn. Old Barn is approximately 218m from the nearest inverter.</p> <p>Transformers are located further away (approximately 275m from the nearest property) in order to reduce the potential for noise pollution.</p> <p>The Noise Impact Assessment concludes that <i>“Based on the development proposals, future residual ambient noise levels will not be increased by anticipated plant noise, even based on worst-case assumptions”</i> (5.11) and that <i>“considering both the initial assessment of impact and the relevant contextual factors, in line with BS 41242 and other relevant guidelines, no unacceptable noise impact, and consequently no harm to residential amenity, is anticipated as a result of proposed development.”</i> (5.15)</p> <p>Therefore, there should be no noise impact to the amenity of nearby residents or users of the footpaths.</p>

	Construction noise will be kept to a minimum, with operations restricted to normal working hours. The entire construction period is expected to last no more than 26 weeks.
CCTV surveillance impacts	<p>The CCTV cameras are designed specifically to secure the solar farm. They will be directed into the site and along the boundaries and will not capture images of nearby properties, PRowS or surrounding area.</p> <p>The applicant has provided details of the CCTV cameras to be used (Drawing 1107_09). The number (36) and position around the site can be seen on drawing 1107_02 Rev12.</p>
Other resident and planning committee comments	
Insufficient ecology works in particular comments regarding bat surveys, and the resultant mitigation is not based on correct information.	<p>The applicant is committed to protecting habitats and species but also providing a set of ecological enhancements. Significant further work has been undertaken to provide robust information.</p> <p>The Preliminary Ecological Appraisal (PEA, Phlorum 10669 Rev 3, March 2023) recommends at 5.19 precautionary approach to protecting bat roosts in 5 identified trees. The Arboricultural Appraisal (Salopian SC:510 AA_V4, 19 April 2023) confirms that none of these 5 trees will be removed or impacted by the works in ways that could affect potential roosts.</p> <p>The National Vegetation Classification Survey (NVC, Phlorum 10669 Rev 1) recommended that an Ecological Enhancement, Mitigation and Management Plan (EEMMP, Phlorum 10669 Rev 2, April 2023) be used to benefit the Local Wildlife Site. The accompanying EEMMP provides this.</p> <p>An updated Biodiversity Net Gain Assessment has been undertaken using the latest Natural England calculator (4.0). This details the habitats to be lost, retained, enhanced and created, supported by the EEMMP and species recommended in the PEA (Phlorum 10669 Rev 3, March 2023). This confirms a very significant net gain.</p> <p>The submitted Illustrative Landscape and Ecological Mitigation Plan (1107_12 Rev 5) shows possible off-site mitigation areas for breeding birds. The applicant's ecologist Enzygo is undertaking 6 breeding bird surveys:</p> <ul style="list-style-type: none"> ▪ The first was undertaken on 20th March 2023 – which revealed a common and typical assemblage of farmland conditions with the majority of species restricted to field boundaries. Notably, there were no ground-nesting farmland species such as Skylark, Lapwing or Yellow Wagtail. ▪ The remaining surveys will be undertaken between April and June 2023. <p>As agreed with the LPA's ecological advisor in draft planning conditions 5 and 6 of the refused application, the same or all of</p>

	<p>these mitigation areas will be used if confirmed as necessary by these surveys. Otherwise, they will not be used.</p> <p>These surveys and mitigation measures will ensure that important habitats and species are protected and enhanced.</p>
Hedging photographs were taken in summer with full coverage and wouldn't be sufficient in the winter months.	An updated LVIA (Ubu, LVIA02) including updated viewpoints and was carried out during Winter 2023 when the deciduous trees surrounding the site had no vegetation. The screening effect of the deciduous trees, hedgerows and under-storey shrubs will increase during the summer months. However, the density of the extensive surrounding vegetation will mostly retain the screening effects during the winter months due to the dense network of branches within the hedgerows and tree canopies.
Impact from glint and glare on residential properties	<p>PagerPower prepared the updated Glint and Glare Assessment (12009A Rev 5, December 2022, updated 30 March 2023) which assesses each individual property within the properties in the neighbouring residential complex, which comprises Horseshoe Barn, Old Barn and Highfields Farm, including from first floor level, along with all other residential and road receptors.</p> <p>Based on the proposed layout (Figure 1) and mitigations (Figure 4) the report concludes no impact upon residential amenity, aviation receptors or road safety.</p> <p>Solar reflections are geometrically possible towards 13 of the 14 assessed dwellings. For all of these dwellings, screening in the form of existing and proposed vegetation and/or intervening terrain is predicted to obstruct views of reflecting panels. No impact is predicted with the proposed mitigation.</p>
How long will hedgerows take to grow and what is the maintenance process? Further information required as to what is proposed in terms of planting.	<p>The retained hedgerows and trees will be maintained during the tenure of the site by a local management company, employed by the solar farm operator.</p> <p>Planting and maintenance of hedgerow and other landscape features within the site will take place in accordance with the EEMMP (Phlorum 10669 Rev 2, April 2023).</p> <p>Species will be native to the area, drawn from the list in Appendix D and E of the PEA (Phlorum 10669 Rev 3, March 2023).</p> <p>Existing hedges will be managed so that they grow to around 3m in height (similar height as the solar arrays). New hedges planted from whips will typically take around 10-years to mature.</p> <p>The new double thickness hedge in the field closest to properties at Horseshoe Barn, Old Barn and Highfields Farm will be planted with semi-mature native hedgerow species to provide more rapid and year-round screening from residential properties. These will be planted at approximately 1m high and are expected to mature in around 3-5 years.</p>

<p>Impacts on local residents during construction phase</p>	<p>The applicant has submitted a Construction Traffic Management Plan (Apex Transport Planning C21075/CTMP01, 30 March 2023), as part of the revised planning application which seeks to ensure efficient and reliable operation of the road network during construction.</p> <p>Access into the site by construction vehicles will be taken from Draycott Road and will turn into the lane located west of the site. This access will also be used for operational purposes. The site will not be accessed via any other farm entrances.</p> <p>The construction process is rapid, lasting only a few months. A transport assessment has been undertaken which confirms the most suitable access and route for construction traffic in order to avoid nearby villages.</p> <p>Noise from on-site activities will vary across the construction period, with noisier activities such as the piling close to residential properties confined to around 1 week. The management plan includes details of when these periods will be, how disturbance will be minimised and will include contact details for the site manager, should the need arise.</p> <p>The temporary construction compound will be located close to the site entrance, well away from residential properties. Details can be agreed via a planning condition.</p> <p>REPD are committed to using local suppliers during construction and operation, which will benefit the local economy.</p>
<p>Land should be used for farming practices as opposed to solar use</p>	<p>The farms have always been used for grassland and grazing and the solar farm has been designed to allow this to continue during the lifetime of the development alongside the biodiversity measures that have been proposed throughout the site. Additionally, there is no loss of any agricultural land as the temporary development will be restored its original form at the end of its life.</p> <p>More detail is provided in Section 7.2 of the Planning Design and Access Statement (April 2023).</p>
<p>There will be no benefits for the local community</p>	<p>The development will bring significant benefits in the form of renewable energy supply, climate change mitigation and biodiversity enhancements. However, the applicant recognises that the development will have some more immediate impacts on some residents and therefore have agreed to offer a Community Benefit Fund Agreement to Draycott and Checkley Parish Councils. These will be payable annually with RPI increase for the lifetime of the project starting from energisation.</p> <p>Draycott Parish Council have confirmed they are happy to finalise the Community Benefit Fund Agreement formally in due course with the re-submission.</p>

4. Conclusion

This planning summary document accompanies a full resubmission of a planning application at the land between the settlement of Draycott in the Moors and Upper Tean, in Staffordshire Moorlands, ST10 4JJ. The purpose of this document was to summarise the proposed amendments and to provide planning commentary on how these address the reasons for refusal.

It is considered that the proposed amendments result in low level and localised landscape and visual harm, including cumulative or in combination effects, and the proposals protect the natural and historic environment. The impact on neighbouring amenity has been further reduced by the proposed set back from the neighbouring properties at Horseshoe Barn, Old Barn and Highfields Farm and new hedge planting.

Alongside this, the development delivers considerable benefits to climate change, renewable energy and biodiversity.

The Secretary of State and planning inspectors have confirmed at recent planning appeals that significant weight should be applied in decision-making to climate change, generation of renewable energy and biodiversity net gain and that these can outweigh landscape harm. The applicant considers that this should be the case at Totmonslow as there was no significant harm identified by the LVIA surveyors and as a result, planning permission should be granted for this sustainable development.