

Bagnall Parish Council OBJECTS to SMD/2023/0523, Solar Complex at Rownall Farm. ST9 0BT

Bagnall Parish Council notes the recent policy document and press release produced by Staffordshire Moorlands District Council :-

Moorlands Plan to help reverse nature decline Published on 27 October 2023

With studies revealing that the UK is one of most nature-depleted countries in the world, halting the decline of the natural world has never been more important - and here in the Staffordshire Moorlands a plan for helping do just that has been launched.

The Plan for Nature will focus and guide the work of the District Council to stop, and reverse, habitat loss in the Moorlands. It has been developed in partnership with Staffordshire Wildlife Trust and key stakeholders.

To fulfil the vision for biodiversity, these targets have been developed:

- *30% of Staffordshire Moorlands land will be managed for wildlife by 2030*
- *Support priority species with the help of community groups*
- *Develop plans to improve water quality in nature*
- *Improve wildlife sites*
- *Improve the Churnet Valley as a home for biodiversity*
- *Ensure access for all to green spaces*

Councillor Nigel Yates, Cabinet Member for Climate Change and Environment, met colleagues from Staffordshire Wildlife Trust, and the some of the Friends of Cecilly Brook at the nature site in Cheadle to launch the plan.

He said: "We're extremely fortunate that here in the Moorlands we have some of the most scenic landscapes and natural spaces in the country. We at the Council take our responsibility for protecting and enhancing these sites seriously which is why I'm so pleased that we're launching our Plan for Nature."

The Plan is based on detailed mapping by Staffordshire Wildlife Trust and will help meet the Council's new enhanced statutory duty on biodiversity as well as other provisions in the Environment Act 2021 including Biodiversity Net Gain in new developments.

Councillor Yates added: "This evidence base will help us prioritise our use of resources, and our work with other partners, to deliver conservation actions that minimise habitat loss and help species recover.

"I'd like to thank the team at Council, the Wildlife Trust, and everyone who has contributed to the Plan, for all their hard work. We'll continue to work together to ensure we're making a positive difference whilst ensuring everyone has access to the green spaces and natural environments that are so important to our wellbeing."

Dave Cadman, Head of Nature Recovery Networks at Staffordshire Wildlife Trust, said: "It's vital local authorities are at the forefront of targeted efforts to tackle the nature crisis. We're hopeful that as the Plan for Nature is implemented, we will see wildlife recover and become plentiful across the Moorlands.

"We'd encourage other local authorities to follow suit and would be only too happy to help them to formulate area specific plans."

With the above statements in mind Bagnall Parish Council strongly suggests that the plans for the solar complex at Rownall Farm should be rejected for reasons which follow. For example, if we just focus on one of the species out of those mentioned in the applicants own report, **Skylark**, it confirms that the species was detected at the proposed solar site. Solar Energy UK make the following observation, *“Skylarks can be found on agricultural land which is also suitable for solar farms and consequently, there is concern surrounding potential impacts. Preferring to nest in open fields, away from tall structures, skylarks need clear sight lines in order to spot predators. The presence of solar arrays is therefore not conducive to nesting by skylarks.”*

The survey undertaken by Elite Ecology for the applicant states:-

Skylark (Alauda arvensis)

A resident breeder, passage/winter visitor, populations are declining in almost all countries of northern and western Europe. In the UK, the population halved during the 1990s, and is still declining. The UK Farmland Bird Indicator 1970-2007 shows a 51% drop. It is also a species “of principal importance for the purpose of conserving biodiversity” covered under section 41 (England) of the NERC Act (2006).

They are classed as a UK BAP priority species identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

One sighting was observed in song February which suggests it is likely looking for an early place for nesting.

With the Skylark population generally declining we consider that it is inappropriate to create an industrial development at the site which will clearly disrupt the species nesting and breeding activity.

Other birds noted at the site and reported in the applicants own study and also on the at risk RED list included the Lapwing and Snipe with the former stated to prefer open grassland which, we would suggest, is significantly different to the proposed industrial development.

At this point let us remind ourselves of Councillor Yates statement “.....will help us prioritise our use of resources, and our work with other partners, **to deliver conservation actions that minimise habitat loss and help species recover.**” (Our emphasis.)

The proposed development, we consider, is incompatible with the above statement. Habitat loss will certainly take place and consequently it may be expected that at risk bird species will not recover if the solar development is allowed to go ahead.

Turning to the site location itself we note the following statements made in the applicants submission:-

- 3.1.2 The proposal must be located close to an agreed point of connection, because as distance from the point of connection increases the scheme will experience increasing thermal losses and incur increasing costs for trenching and cable runs, eroding the financial viability.
- 3.3.1 Having limited the site search to areas outside of the above planning designations, the site selection process is then refined to identify the most suitable site within viable proximity to the agreed point of connection. The extent of the search area will vary depending on some key factors influencing the economics of the project, including the costs of connection to the grid, the anticipated yield of the planned scheme (closely related to the solar irradiation levels within the area) and other commercial issues pertaining to related landowner agreements required to facilitate the connection. In this instance, the search covered an area of approximately 3km from the point of connection. 3km is considered to be the maximum distance from the grid connection point within which the scheme can remain commercially viable.

Bagnall Parish Council questions these observations., We suggest, “3km considered to be the maximum” is the applicants own criteria and we further suggest it is created to suit the circumstances of the Rownall site.

In the Council for Preservation of Rural England (CPRE) report, THE PROBLEM WITH SOLAR FARMS, this aspect is considered with an alternative distance of 11km quoted and the report also indicate developers preferences :-

- *Developers promote the cheapest solutions only and do not consider a range of feasible options.*
- *Low Carbon’s Great Wilbraham solar development (which is connected to a sub-station 11km from the site) demonstrates that there is no technological barrier to connecting sites at a range of locations.*
- *Developer’s preference for the lowest cost options leads to clustering around sub-stations (Thaxted and Stocking Pelham).*
- *Harm to the landscape is therefore intensified.*
- *Increased harm to the character of Public Rights of Way.*
- *Increased impact on local wildlife.*

Bagnall Parish Council have found **no evidence** in the submitted documentation to confirm that sites further afield have been considered by the developer .

The comments of a Planning Inspector are considered to be relevant in this regard:-

Elizabeth C Ord LLB(Hons) LLM MA DipTUS

Appeal Ref: APP/D3505/A/13/2204846 Valley Farm, Wherstead, Ipswich, Suffolk, IP9 2AX 2 June 2014

The Sequential test:

The first question to ask is whether the use of agricultural land is necessary. This exercise should demonstrate that no suitable brownfield land or non agricultural land is available within a reasonable search area...

...there is no policy guidance which advocates restricting searches to within a local authority's administrative area...

Even if the use of agricultural land were considered to be necessary, the Appellant has not demonstrated that poorer agricultural land has been chosen in preference to higher quality land...

Whilst the sequential test must be proportionate, no good reasons have been advanced to show why it could not involve a robust desk based assessment supported by surveys of selected sites within a realistic area of search. Simply surveying one site is wholly inadequate.

So to reiterate the point we have found **no evidence** in the submitted documentation to confirm that sites further afield have been given consideration by the developer .

Bagnall Parish Council considers that the content of the CPRE report is useful in summarising the several areas of concern and indeed supports our Councils objection to the proposed development at Rownall, a copy is consequently attached for reference.