



Third
Revolution
Projects

New Buildings Solar Farm

Alternative Site Search Report

Applicant: New Buildings Solar Farm Ltd.

Date July 2025

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Applicant: New Buildings Solar Farm Ltd.

1.0 Summary and Conclusions

The selection of sites for solar farms involves a complex process of site search and assessment to identify suitable locations, which are acceptable in terms of planning, technical and commercial considerations. Whilst the Government, East Staffordshire Borough Council and Staffordshire Moorlands District Council seek to urgently tackle climate change, it is essential to locate and develop suitable sites for renewable energy generation, to ensure a smooth transition from fossil fuel to a net-zero economy. This report describes the process the applicant has used to locate the site for the proposed New Buildings solar farm.

Solar farms provide clean renewable energy and are recognised as an important means to achieving the UK's legally binding target of net-zero carbon emissions by 2050 and the five-fold increase in solar power by 2035 in the 2022 British Energy Security Strategy¹. While solar farms require significant amounts of land, they are clean, quiet, and can dramatically enhance biodiversity within sites. Therefore, agriculture can continue alongside energy generation with little conflict (known as 'agrivoltaics').

Planning policy is supportive of solar farm developments. The National Planning Policy Framework (NPPF) is clear that *"the planning system should support the transition to net zero by 2050... in ways that contribute to radical reductions in greenhouse gas emissions...; and support renewable and low carbon energy and associated infrastructure"* (Paragraph 161). It should also support *"the development and diversification of agricultural and other land-based rural businesses"* (Paragraph 84), and for decisions to recognise *"the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land"* (Paragraph 187b).

The National Planning Practice Guidance (NPPG) and 2015 Written Ministerial Statement, advise further on the factors that local planning authorities should consider.

In summary, planning and other policies are very supportive of renewable energy, including solar farms, and do not restrict their development on agricultural land or prevent the use of higher-grade land. Importantly, the NPPF confirms the importance in decision-making of the wider benefits from natural capital and ecosystem services, including the economic and other benefits of best and most versatile (BMV) agricultural land. Such benefits include food growing, but also include control of climate, nutrient cycles, pollination, flood prevention, and energy – all of which can be provided by solar farms.

An Agricultural Land Classification (ALC) survey accompanies this analysis and has demonstrated that the land is a combination of Subgrade 3a and 3b agricultural quality, primarily limited by wetness/workability constraints.. This impacts the type and yield that any crop grown on the land can achieve. It could be beneficial to fallow the land or sow to grass, and potentially allow livestock grazing to increase the organic matter in the soil.

In the context of national planning policy and guidance:

- The use of agricultural land has been shown to be necessary.
- Poorer quality land has been used in preference to higher quality land.

¹ British Energy Security Strategy, Department for Business, Energy and Industrial Strategy, 7 April 2022.

- The proposal allows for continued agricultural use and encourages biodiversity improvements around arrays.
- Compliance with policy guidance combined with significant benefits creates a clear case for using a combination of 3a and 3b land within the pattern limitation of functional 3b:
- The development is temporary and completely reversible at the end of its life.
- Generating enough secure, available and affordable renewable energy to power around 5,700 homes, thereby supporting the transition to a zero-carbon energy system.
- Improved resilience of the electricity grid by offering power quality services to the national grid.
- Planting of new trees, hedges and meadow around the solar farm to deliver a significant increase in hedgerow and overall habitat compared to the existing use. This will support the diversity and abundance of flora and fauna, and in accordance with policy, will secure wider benefits from natural capital and ecosystem services. A management plan will ensure these benefits are maintained for the duration of the development.
- No loss of agricultural land and continued grazing throughout the development's operation.
- Farm diversification to help ensure the continued viability of the farm holding.
- In conclusion, the applicant has demonstrated that the use of agricultural land is necessary, that poorer quality land has been used in preference to higher and that in any case the land does not function as best and most versatile agricultural land, that an agricultural use can continue and biodiversity enhancements will be secured. Therefore, there is no conflict with policy or guidance relating to the use of agricultural land.

2.0 Introduction and Policy Context

This report accompanies the Agricultural Land Classification (ALC) survey² commissioned by the applicant to assess the proposed development in terms of the NPPF and local planning guidance on the use of agricultural land for solar farms. Its findings justify the selection of this site whilst demonstrating that a lower grade agricultural land has been prioritised for the site.

2.1 Site selection – an overview

The selection of sites for solar farms involves a complex process of site search and assessment to identify suitable locations, which are acceptable in terms of planning, technical and commercial considerations. This requires consideration of planning policy and integration with the UK's electricity network. Whilst the Government seeks to urgently tackle climate change, it is essential to locate and develop suitable sites for renewable energy generation, to ensure a smooth transition from fossil fuels to a net-zero economy.

A full ALC survey and report has been submitted as part of the planning application. To inform the site selection process, analysis of Defra ALC mapping suggests that the area under consideration is a combination of Grade 3 and Grade 4 land, suggesting a low to moderate possibility of being BMV land. The eventual site selected has been confirmed by survey work to be a combination of Subgrade 3a and 3b land.

² Agricultural Land Classification, Bateman Rural Associates (June 2022)

This report describes the process the applicant has used to locate the site, including identifying and assessing other potential sites.

Solar farms must address a range of planning considerations at both national and local levels, and at the same time meet the criteria set for electricity infrastructure by the National Grid and Distribution Network Operators (DNO). While forecast generation capacity and demand provide important context, Government policy presents an unconstrained need for additional renewable energy capacity and no requirement to demonstrate need for a particular facility.

The site selection process is first determined by locating those areas within the distribution network where there is capacity to connect additional electrical input. Having identified capacity, there follows a long process of identifying sites within a viable distance from the point of connection, where material planning considerations are, or are likely, to be able to be made acceptable, and where a site is deliverable.

Often located on agricultural land because of their size, there are also a growing number of solar farms allowing continued agriculture ('agrivoltaics') – such as grazing for example – and providing considerable benefits to the wider farm, and biodiversity. The selection process is therefore both iterative and thorough as detailed in this report.

2.2 Planning policy

Solar farms provide clean renewable energy and are recognised as an important means to achieving the UK's legally binding target of net-zero carbon emissions by 2050 and the five-fold increase in solar power by 2035 in the 2022 British Energy Security Strategy. In addition, they can also dramatically enhance biodiversity within the site.

Planning policy is supportive of solar farm developments:

“the planning system should support the transition to net zero by 2050 ...; and support renewable and low carbon energy and associated infrastructure” (NPPF, Paragraph 161).

Furthermore, the planning system should also support the development of the local economy and encourage *“the development and diversification of agricultural and other land-based rural businesses”* (NPPF, Paragraph. 88) and for planning decisions to contribute to and enhance the natural and local environment, including *“the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”* (NPPF, Paragraph 187b).

The NPPG³ sets out the factors to help local councils in developing policies for renewable and low carbon energy and identifies the planning considerations. It states:

“Encouraging the effective use of land by focusing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value;

Where a proposal involves greenfield land, whether:

(i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and

(ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate

³ Renewable and low carbon energy, UK Government National Planning Policy Guidance, (18th June 2015).

Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.” (NPPG, Paragraph: 013 Reference ID: 5-013-20150327).

The Written Ministerial Statement (WMS) was made nearly 9 years ago and pre-dates the legal commitment to Net Zero – this represents a step change in the importance given by government to addressing climate change and delivering renewable energy. The principal additional policy the WMS provides is to expect use of BMV land to be justified by the “most compelling evidence”. Because it has been established above that the site should be considered as lower grade 3b, the evidence is not provided.

The Overarching NPS for Energy (EN-1) sets out the Government’s policy for delivery of major energy infrastructure (paragraph 1.3.1). Paragraph 3.3.20 of EN-1 states that there is an urgent need for new electricity generating capacity to meet the energy objectives. It goes on to say:

“Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.

The NPS for Renewable Energy Infrastructure (EN-3) EN3 also states that *“land type should not be a predominating factor in determining the suitability of the site location”* (Paragraph 2.10.29).

The most relevant local planning policies contained in the adopted Local Plans of the two local authorities are:

Policy SD2 of The Staffordshire Moorlands Local Plan regarding renewable and low-carbon energy. This policy states that the Council will strive to meet part of the District’s future energy demand through renewable or low-carbon energy sources and will support large-scale stand alone renewable development.

Strategic Policy 28 of the approved East Staffordshire Local Plan states that the Council will promote and encourage all technologies and types of renewable and low-carbon energy generation

In summary, planning and other policies are very supportive of renewable energy, including solar farms, and do not restrict their development on agricultural land. Importantly, the NPPF confirms the importance in decision-making of the wider benefits from natural capital and ecosystem services, including the economic and other benefits of best and most versatile agricultural land. Such benefits include food growing, but also include control of climate, nutrient cycles, pollination, flood prevention, and energy – all of which can be provided by solar farms.

The next section of this report deals with the process of identifying the site area, and the site itself.

3.0 Identifying the Study Area and Sites

This section describes the Applicant's approach to identifying potential areas of the country and sites for development.

3.1 Overarching national need

The need for this type of development has been described in Section 2.2. Although the NPPF is clear at paragraph 168 that developers are not required to demonstrate need (and therefore there is an unconstrained need for new capacity), it is useful to describe the increasingly urgent need for the proposed development in the context of the climate emergency declared by the Government, East Staffordshire Borough Council and Staffordshire Moorlands District Council, and the transition away from fossil fuels to a renewable energy system.

3.2 Need for development in this location

Demonstrating specific local needs is not possible since the responsibility for ensuring supply and demand are in balance, locally and nationally, falls to The National Grid as the electricity system operator. It does this by prescribing requirements for power capacity (megawatts of generation) and services (e.g. provision of capacity at peak times, balancing and frequency response). This is becoming more challenging as the traditional large, centralised power stations become unviable and the Government's policy is to close all coal-fired power stations by 2024.

The UK's old, centralised electricity network is being replaced, with Government support, by a decentralised one powered by renewable energy, such as solar and wind, supported by small flexible demand responsive facilities, such as battery energy storage. Apart from the largest power stations, which connect directly to the transmission network, most projects connect to the distribution network (in this case Western Power Distribution Network now known as National Grid Electricity Distribution (NGED)).

The electricity network was designed for centralised generation and as a result, large parts of the network do not have the capacity to accommodate new connections. Therefore, in the context of an unconstrained policy need for new generation capacity (NPPF Paragraph 168a) and the Government's strategy to deliver a five-fold increase in solar by 2035, project locations are determined in relation to available grid connection capacity rather than by locally specified needs. It is therefore necessary to assume that all substations and circuits with capacity should be expected to accommodate some form of generation unless material planning policy reasons indicate otherwise.

3.3 Identifying the study area

The previous section established that each local substation or circuit should be considered for whether it can accommodate some form of generation, storage or balancing facility. Therefore, grid capacity maps are first consulted to determine those that may be suitable.

There are 11 Distribution Network Operators (DNO) operating across the UK. The Applicant's process involves consulting the data released by relevant DNOs and finding suitable sites with both capacity and a viable connection to the grid. Once an area has been identified, the publicly available information relating to the grid is consulted. The 132kV Forsbrook Circuit (see

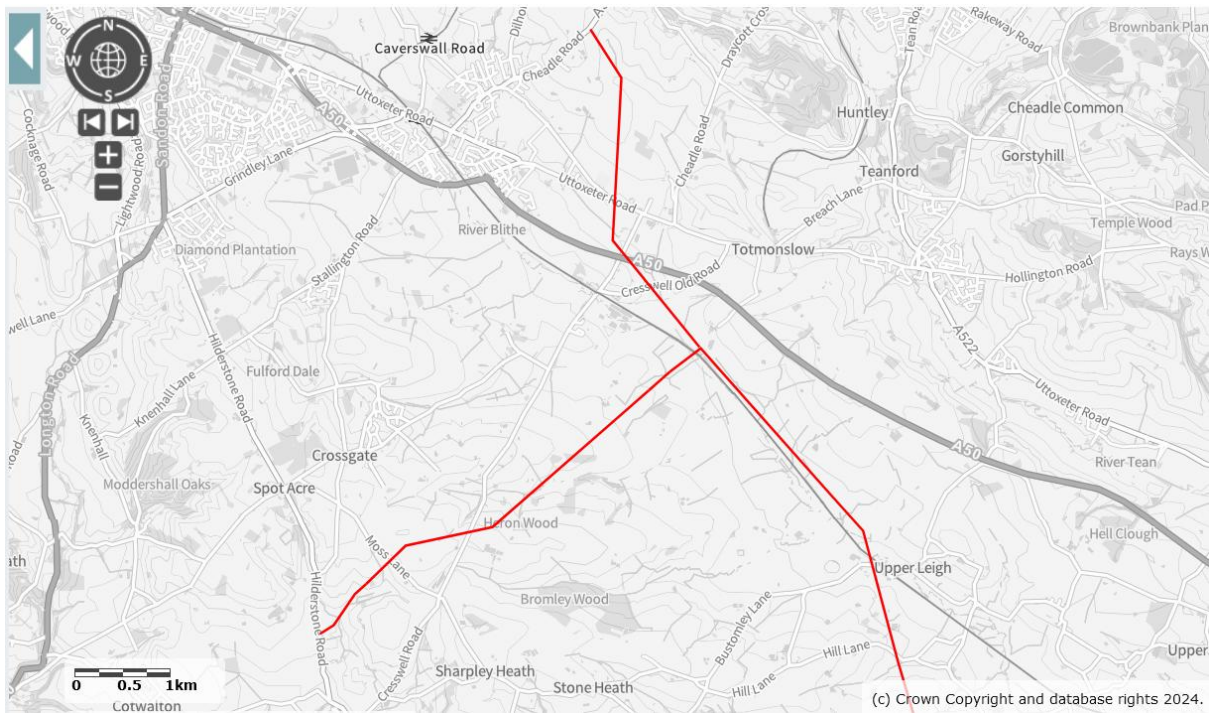


Figure 1) was identified as having sufficient capacity to connect a generation project.

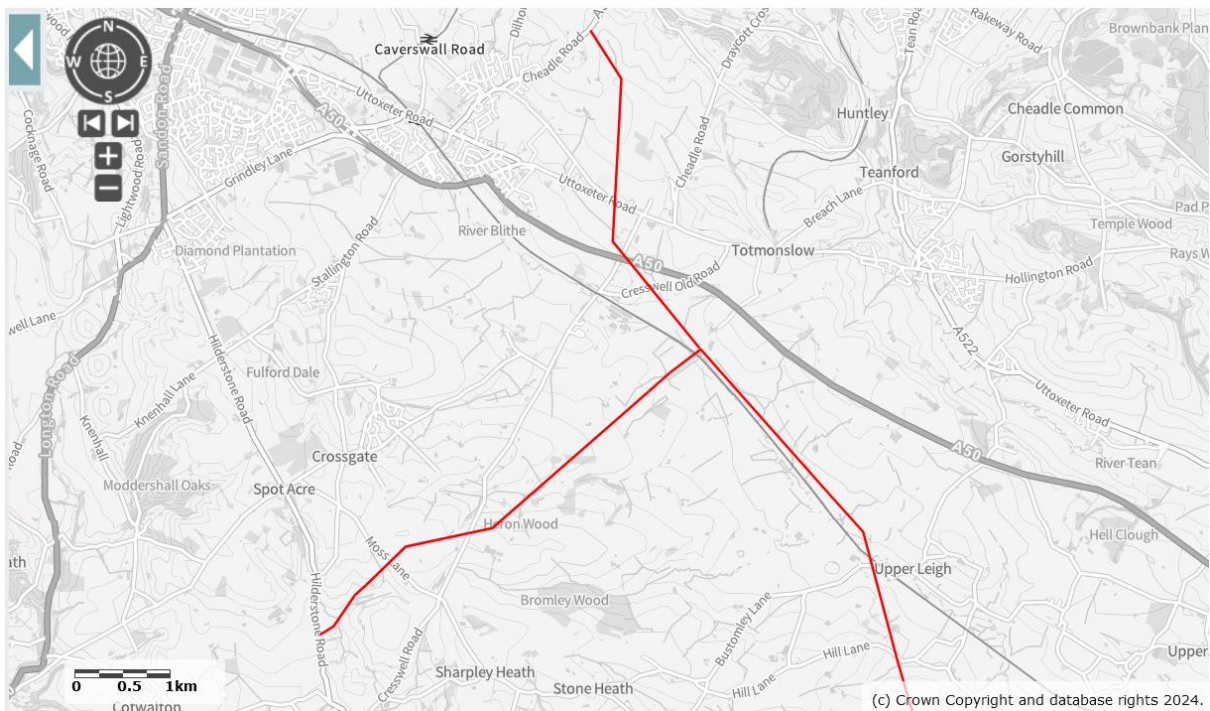


Figure 1: Location of Forsbrook Circuit (red) study area within the Staffordshire area (Source: Magic Maps)

This does not mean that it would be feasible or viable to connect every location near to the Forsbrook circuit. Factors such as the intervening presence of development, landscape features, infrastructure, and the type of terrain may render connections to the substation impractical or not commercially viable. For example, laying a cable across a field directly to a connection is significantly more viable than if it must cross a river, road, railway or pass through a settlement, and does not require additional rights to be secured. This is discussed further below.

In practice, a connection to a generation or storage development will need to run underground to the point of grid connection itself, with the viability of the connection (due to costs) declining as distance increases. Therefore, a search area with a 1km radius either side of the Forsbrook circuit was established to form the study area for potential sites (as shown in Figure 1).

3.4 Approach to identifying suitable sites within the study area

The Applicant has adopted a sequential approach to identifying sites within the study area. This is not a requirement of planning policy but has been used to demonstrate the rigorous approach taken by the Applicant. As the NPPF does not offer a methodology for selecting sites for energy developments, the Applicant has drawn on the sequential approaches used to identify housing sites and for avoiding sites at risk of flooding. The term *deliverable*, as defined in the glossary of the NPPF, has therefore been adapted for use as the basis for identifying suitable sites.

To be considered deliverable, sites should be:

- Available now; and
- Offer a suitable location for development now.

The Applicant considers a site to be suitable by applying the following criteria:

- Minimum site area of approximately 81 hectares (200 acres). For the available grid connection, sites could not be significantly smaller than this as there will be insufficient space to accommodate a solar facility.
- Seek to avoid key designations (see Figure 2) including:
 - Ancient Woodland
 - National, European, and International environmental designations: Areas of Outstanding Natural Beauty, Biospheric/Biogenetic Reserves, Environmental Sensitive Areas, RAMSAR sites, Sites of Special Scientific Interest, National Parks, Special Area of Conservation and Special Protection Areas
 - Heritage Coast
 - Country Parks
 - Historic Battlefields
 - National Heritage Future Zones
 - Nature Reserves
 - Registered Park or Gardens
 - Royal Society for the Protection of Birds areas
 - Scheduled Monuments
 - Flood zones 2 and 3
- Be able to overcome physical, environmental and policy constraints, including planning policy or other designations and on-site or connection route infrastructure or features (such as trees, pylons, railway lines and buildings).
- Be able to overcome amenity constraints, such as noise and visual impacts.
- An available and financially viable anticipated cost of connection. The costs to connect to the grid increases almost exponentially as the connection voltage increases.
- Competitive rent levels payable to the landowner.

In summary, this section has demonstrated a clear need for renewable energy installations to be located where there is capacity to connect to the electricity grid. It has also shown the approach the

Applicant has taken to identifying capacity across the country. Government policy presents an unconstrained need for new renewable energy infrastructure capacity and grid analysis has identified capacity for renewables development around the Forsbrook Circuit.

4.0 Policy Analysis

Planning policy is supportive of renewable energy developments, including BESS facilities. However, the proposed site is in the Green Belt, where inappropriate development should be avoided unless very special circumstances (VSC) can be demonstrated. In the context of need, described earlier, the remainder of this assessment demonstrates:

- That there are no viable brownfield or strategic sites in the search area.
- That the only viable and available sites are within the Green Belt.

4.1 There are no viable brownfield or strategic sites available

A search of the brownfield sites registers for both Staffordshire Moorlands District Council and East Staffordshire Borough Council was conducted to identify any possible brownfield sites in the study area. This found that all of the brownfield sites across both districts were too small to accommodate the proposed solar farm, or were earmarked for housing development, or already had planning permissions in place and were not available for this form of development.

The largest site within the brownfield site registers was the 19.3 hectare Branston Depot site in East Staffordshire. However, this site was of insufficient size and already has outline planning permission for housing development.

4.2 Choice of land within the study area

Any potential sites within the study area must be deliverable, as defined in Section 3.4, taking into account statutory and non-statutory designations. Key designations (not including the Green Belt) are shown in Figure 2.

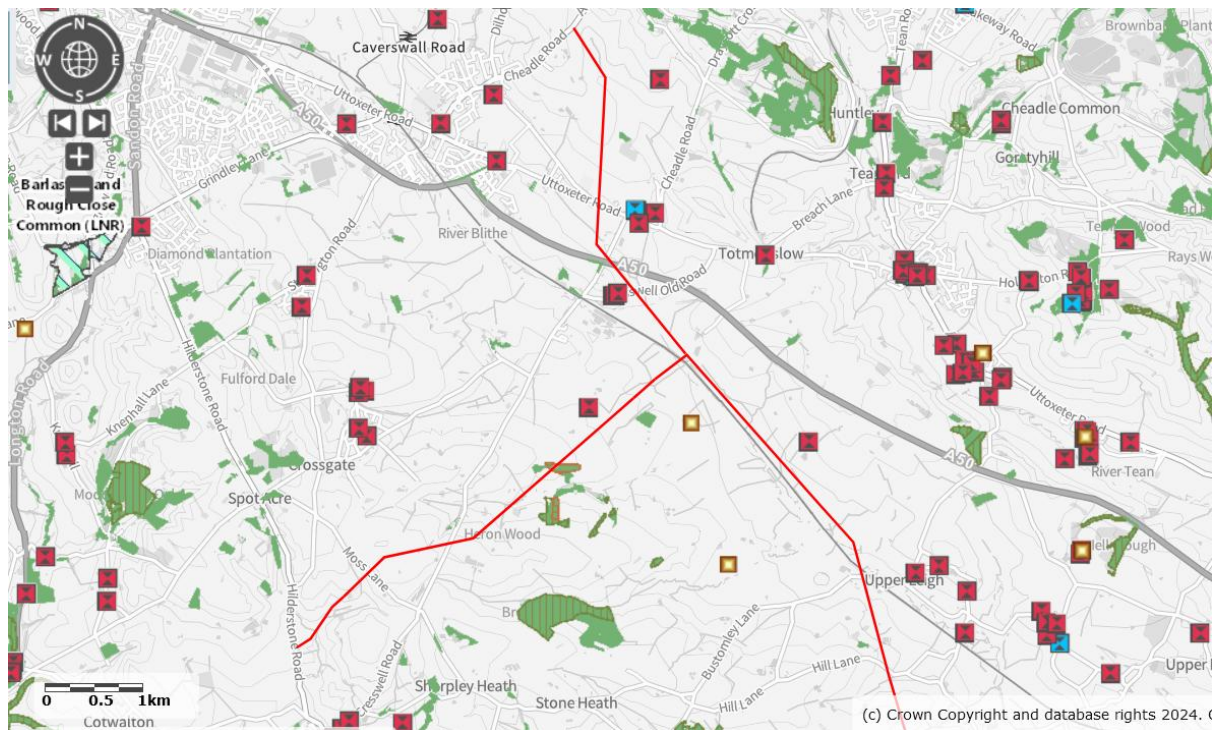


Figure 2: Image showing the key designations within the study area (Source: MAGIC Maps)

There are relatively few ecological designations in the study area that would be significant constraints, with these being limited to areas of ancient woodland and other priority woodland habitats.

There are no Historic Battlefields in the search area, there are five Scheduled Monuments within the area, along with three Grade II* listed building and a number of Grade II Listed Buildings around the area. The nearest Scheduled Monument (Paynsley Hall moated site and outer enclosure) is around 360m south west of the Forsbrook circuit at its closest point.

The nearest Grade II* listed building (Church of St Margaret) within the search area is approximately 370m east of the 132kV circuit, with the next nearest Grade II* building being almost 2km away from the 132kV circuit. There are a number of Grade II listed buildings within the search area, which are somewhat more concentrated in the east part of the search area, with comparatively few in the southern part of the study.

In terms of flood risk, Figure 3 below shows that the majority of the search area is in Flood Zone 1, the area of lowest risk. There are some areas within Flood 2 and 3 in close proximity to the River Blithe and the River Tean.

Figure 4 below regarding the risk of flooding from surface water shows a similar picture, with some areas of higher risk close to watercourses, but with the vast majority of the search area being in areas of very low risk.

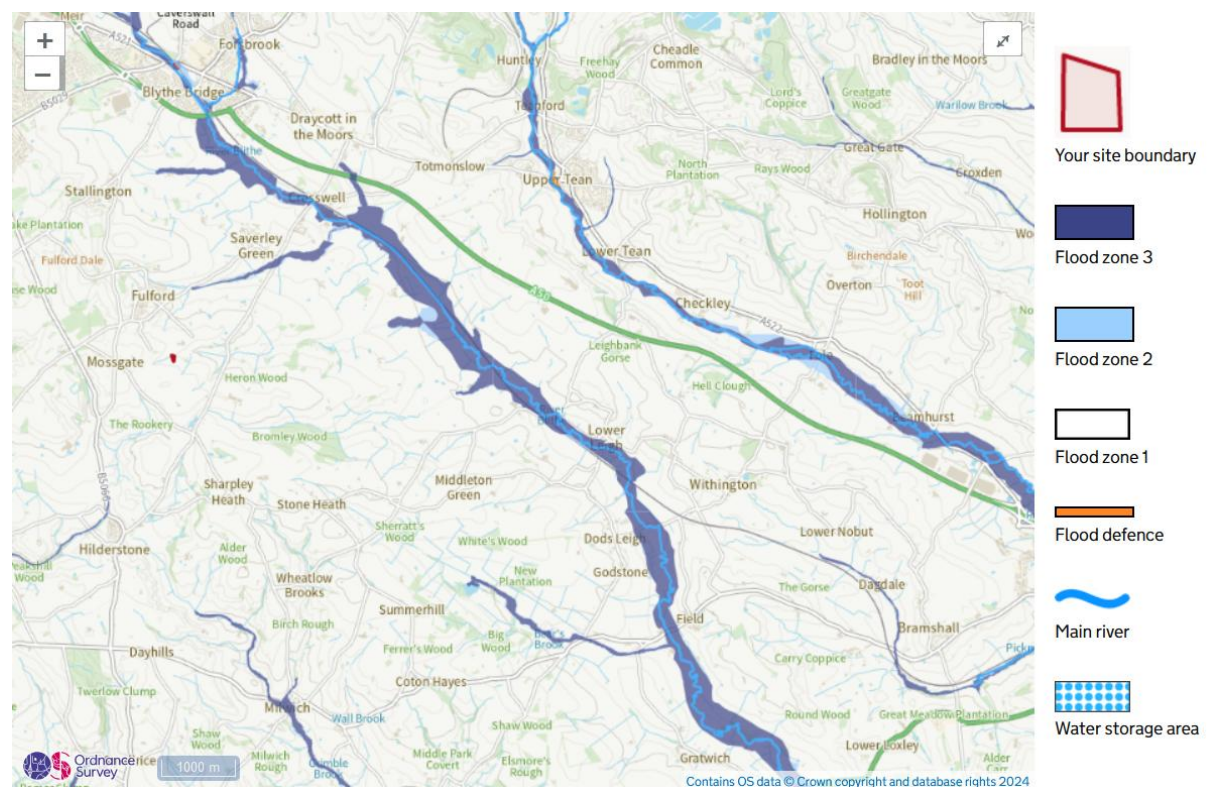


Figure 3: Flood Zones with the search area (Source: gov.uk)

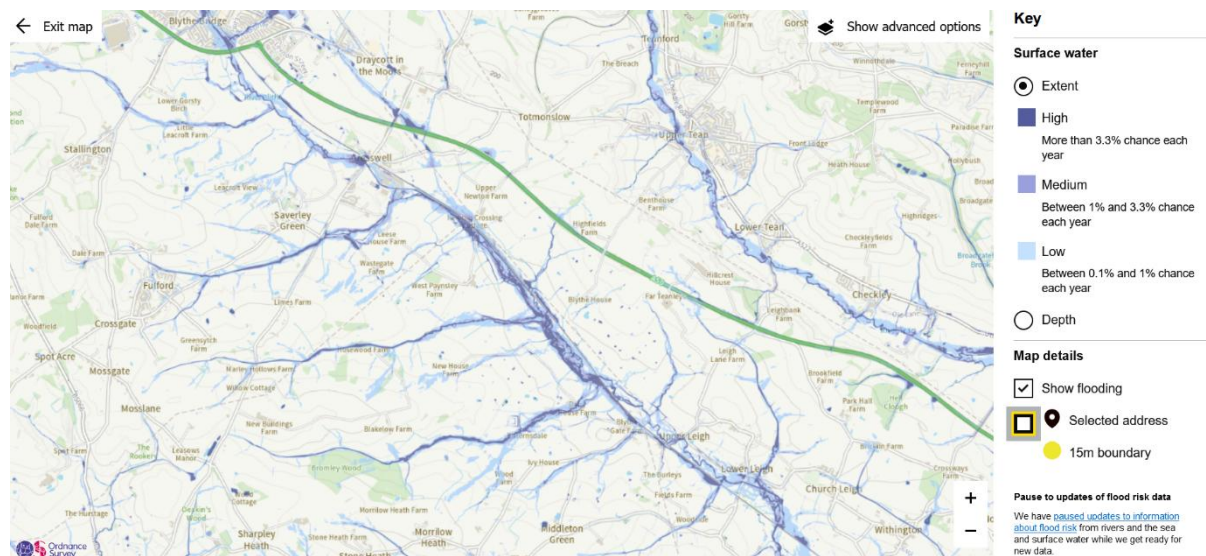


Figure 4: Surface Water Flooding Risk around the Coventry Substation (Source: gov.uk)

Selecting the Site

Within the study area shown in Figure 1, the applicant assessed whether sites would be available for the development of a solar farm. The applicant has undertaken a detailed feasibility assessment which included the following criteria:

- Areas with the fewest landscape and visual impacts.
- Areas with the fewest heritage and archaeological constraints.
- Areas with the lowest agricultural land quality.
- Areas that are available from the landowners.

This process confirmed that there were potential sites that could be deliverable on a sizeable plot of arable land in the vicinity of the Forsbrook circuit as shown in Figure 5.

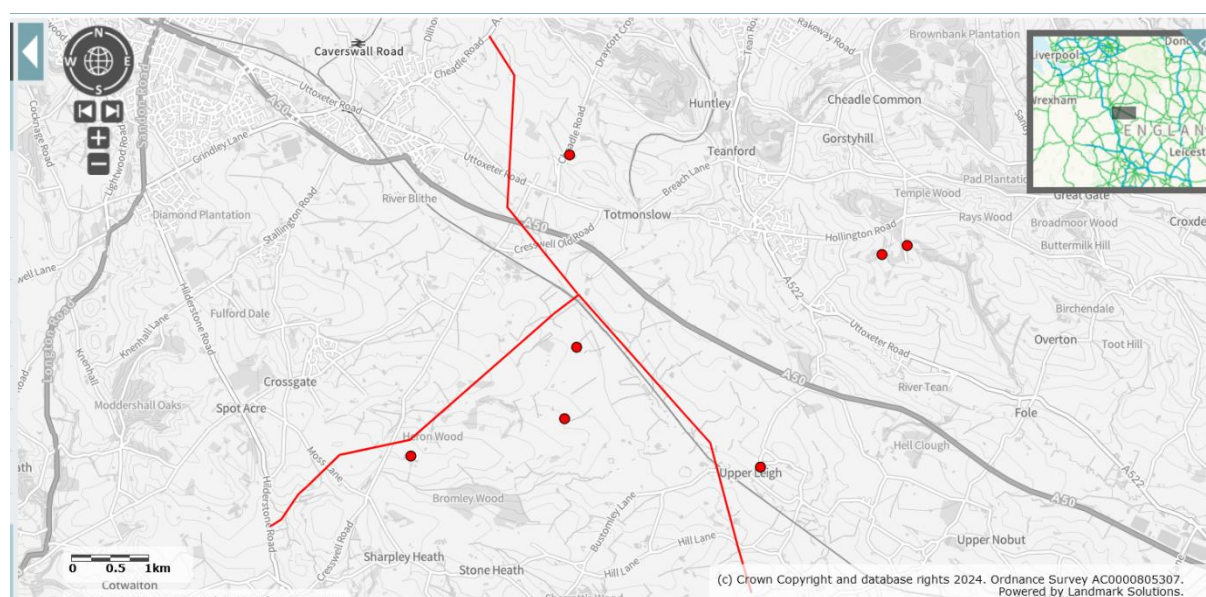


Figure 5: Potentially deliverable sites within study area (Source: Magic Maps)

Once identified, these sites were assessed based on a traffic light system and can be seen in Table 1:

- **Green** – criteria does not represent a significant constraint to development.
- **Amber** – a potential sensitivity requiring further investigation.
- **Red** – a clear sensitivity/constraint to development.

The site selected following this process was considered potentially suitable against all criteria. It has a willing landowner, is available for development now and therefore considered deliverable, as defined by the NPPF-based methodology described above. It is of a suitable size to accommodate a viable project, avoid all key designations and is capable of addressing all physical, environmental, policy and amenity constraints.

Table 1 - Assessment of site viability

Site Reference	Landscape and Visual	Heritage	Ecology	Availability from landowner	Overall Assessment
Paynsley Hall Farm	No specific landscape designations. Several Public Rights of Way within and close to the site. Moated site cultural receptor immediately adjacent. Few residential receptors in close proximity.	Site is immediately adjacent to a Scheduled Monument. Few other listed buildings in the vicinity.	One area of priority woodland habitat to the west of the site.	Not available	Not deliverable
Grange Farm	No specific landscape designations. One Public Right of Way crossing the site. Fairly steep sloping site that may give rise to views from residential receptors to the south and south west.	A cluster of listed buildings to the south, including a Grade II* listed building.	Small areas of priority woodland habitat close to the site.	Not available	Not deliverable
Bramble Cottage	No specific landscape designations. No Public Rights of Way within or close to the site. Few residential receptors in close proximity.	Very few heritage assets in close proximity.	No apparent ecology constraints.	Not available	Not deliverable
New House Farm	No specific landscape designations. Several Public Rights of Way within and close to the site. Moated site cultural receptor in the vicinity. Few residential receptors in close proximity.	Two Scheduled Monuments within 1km of site. Few other listed buildings in the vicinity.	Small areas of ancient woodland and priority woodland habitat close to the site.	Not available	Not deliverable
Goldhurst Farm	No specific landscape designations. One Public Right of Way immediately to the west of the site. One cultural	A cluster of listed buildings to the west, including two Grade II* listed buildings.	Areas of ancient woodland and priority woodland habitat close to the site.	Not available	Not deliverable

	receptor very close to the site.				
Heath House	No specific landscape designations. Two Public Rights of Way close to the site. Several cultural receptors close to site.	A cluster of listed buildings close to the site, including two Grade II* listed buildings.	Areas of ancient woodland and priority woodland habitat around the site.	Not available	Not deliverable
New Buildings Farm	No specific landscape designations. A Public Right of Way runs through the site. Few residential receptors in close proximity. Subject to detailed assessment of visual impact and impacts on landscape and consideration of appropriate mitigation, the site was deemed capable of addressing landscape concerns.	Generally suitable. Listed buildings nearby are unlikely to be affected. No designated archaeological assets within close proximity.	Adjacent to an area of Ancient Woodland, which is also a Local Wildlife Site. Any impacts could be satisfactorily addressed in scheme proposals. The site contains sufficient land to enhance biodiversity.	Available	Potentially deliverable

4.3 Planning Benefits

This document describes the process the Applicant has used to identify the site, confirm the need to use agricultural land, and assesses the proposed development against related policy and guidance. As detailed in the planning statement, the significant benefits of the development include:

The critical need for renewable energy generation and storage— As set out in Section 3 above, the UK Government and National Grid have both emphasised the need for a massive increase in renewable energy generation.

Net Zero and the climate emergency – in 2019 both East Staffordshire Borough Council and Staffordshire Moorlands District Council declared a climate emergency. With solar farms being a crucial factor in supporting the UK's transition to renewable energy generation, the proposed development would make a valuable contribution to achieving legally binding net zero emission targets on a national and local level and meeting the aims of the climate change strategy.

Energy security – the proposed development supports the maximisation of renewable energy production whilst providing security of supply in accordance with Government Policy in reducing reliance on fossil fuel generation, thereby avoiding adverse environmental and climate effects.

Economic Benefits - The proposed scheme will result in significant economic benefits for the area insofar as there will be new jobs created during the construction and decommissioning process. Once the development is operational, employment opportunities will arise in relation to the ongoing management and maintenance of the facility. There is likely to be wider economic benefits to the wider area through the movement to net zero which in turn contribute to positive impacts flowing from the development. The economic benefits therefore clearly support the development in this location.

Biodiversity net gain – the proposed development will deliver a number of biodiversity benefits and a significant net gain overall in excess of 87% as showing in the supporting metric. The biodiversity of the site will be enhanced, primarily through new habitat creation via planting, including native hedgerows. The Applicant has worked hard to ensure they have gone above and beyond in terms of the BNG requirements, and more details in respect of biodiversity are set out in the subsequent sections of the report and accompanying surveys prepared by Enzygo. This is in itself is significant and material consideration that should be given significant weight in the planning balance.

Good design - the design of the proposed development will be a key consideration in the layout of the site to minimise harm and provide significant benefits to the development as a whole. Further details are provided in the Planning, Design & Access Statement.

Lack of alternative sites – due to the requirement for a connection to the National Grid, there are no alternative sites which are suitable, available, and better suited for the proposed development than the proposed site. No brownfield sites were of sufficient scale to accommodate the proposal. All other potential alternative sites within the zone of search were discounted because commercial agreements could not be reached with landowners.

Temporary and reversible impacts – the development is proposed for a lifetime of up to 40 operational years. After this period the storage facility would be decommissioned and all battery storage containers and built structures associated with the proposed development would be removed and the site would revert to its pre-development use. It is therefore considered that the proposed development is considered a temporary and fully reversible development.

5.0 Conclusion

It is concluded that the application site and scheme are the most appropriate means of securing the scheme's benefits. In summary:

The proposal has very specific locational requirement for being sited within 1km of the Forsbrook circuit.

The applicant has undertaken a rigorous approach to site selection, the methodology of which is explained and detailed above.

It is demonstrated that this site performs well against the various planning, environmental and policy requirements and will enable the delivery of this important renewable energy facility whilst minimising impacts on all important planning considerations.

In further support of the scheme, there will considerable ecological and biodiversity enhancements which are detailed in full in the accompanying suite of documents.

Third Revolution Projects

July 2025