

Planning Policy Context

**In support of a planning application for the installation of
Standalone Solar PV modules and Associated Infrastructure on
land at Heywood Grange, Tickhill Lane, Dilhorne, Staffordshire,
ST10 2PL**

February 2015




Prepared by



On Behalf of



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1 Executive Summary

Planning permission is sought for the installation of standalone solar PV modules and associated infrastructure on land at Heywood Grange.

The submission of an Environmental Impact Assessment (EIA) screening opinion request was sought in accordance with section 5 of the 2011 Regulations which deemed that an EIA was not necessary.

The application is supported with standalone surveys addressing landscape and visual impact, ecology, agricultural land classification, impact upon heritage assets and flood risk. In summary;

- The agricultural land classification for the site is Grade 4
- The Landscape and Visual Impact Assessment considers the impact of the proposals upon the surrounding area in some detail, including an analysis of landscape character, and concludes that no unacceptable harm would arise from the development of a solar PV farm in this location
- There is negligible/low archaeological potential on site
- The proposal will not add to flood risk at the nearby watercourses and neighbouring sites
- The ecology survey concludes that through implementation of mitigation measures there will be no adverse impacts arising from the proposal.

Whilst the need to assess the impact of solar PV energy developments is recognised by both national and local policy, it is clear that significant importance is attached to the contribution renewable energy developments make to strategic sustainable development targets.

Government policy set out in the NPPF strongly advocates a positive approach, commenting that renewable energy developments are vital to meeting the government's climate change commitments. The designing and preparation of this application has been achieved with respect to the relevant planning policy and guidance.

The proposals do not contravene any policies and do not cause unacceptable harm. This proposal represents an opportunity for Staffordshire Moorlands District Council to increase renewable energy generation and thus meet its own objectives, as well as contributing to the UK's climate change commitments, without unacceptably compromising other environmental and sustainability objectives

The overall statutory and non-statutory policy and guidance supports the proposed development.

2 Introduction

Aardvark EM Ltd has been instructed by Elgar Middleton to prepare and submit a planning application for the installation of standalone PV modules and associated infrastructure on land at Heywood Grande, Tickhill Lane, Staffordshire.

This planning policy statement has been constructed to demonstrate that the proposal is supported by the relevant national and local planning policy as well as guidance documents.

2.1 The Site

The site is located on land west of the village of Dilhorne, within the boundary of Staffordshire Moorlands District Council. Located approximately 8.5km south east of Stoke-on-Trent, 3.0km north of Blythe Bridge and 4.5km North West of Cheadle, the land is accessed via a farm track leading off from Tickhill Lane.

A detailed description of the site and its location in relation to the surrounding landscape is provided within the Landscape and Visual Impact Assessment (LVIA) that accompanies this planning application.

2.2 Proposed Development

The proposed development is for the erection of 32,188 solar photovoltaic (PV) modules, with associated infrastructure for export of renewable energy to the National Grid. There will be seven transformer houses, one private high voltage switchgear building, one DNO Substation building and one storage container located adjacent to the grid connection point on the northern boundary of the site.

The total installed capacity based on 260w panels of the array is 8.36MWp. Based on the site's solar irradiation level of 3.01kWh/m², the array is anticipated to generate approximately 9,540 MWh per year.

The scheme has been specifically designed to maximise the amount of electrical hours of production per hectare. The design layout takes into account topography, orientation, appropriate ecological buffer zones and mitigation planting.

The proposed site layout and design is shown within the development plan accompanying this application.

2.3 The Applicant

Rochester 007 Limited is a subsidiary company wholly owned by Elgar Middleton Environment Energy Investments Ltd; henceforth the applicant shall be referred to as Elgar Middleton.

Elgar Middleton is an independent solar development and financial advisory company based in both the City of London and Ross-on-Wye in Herefordshire. Their core expertise is in the development, and financing of renewable energy and infrastructure projects across the United Kingdom. Elgar Middleton is a development business focusing on ground based solar photovoltaic (PV) farms and brings together a team with extensive track record and knowledge of the renewable energy sector with capabilities including finance, legal, planning, design and development. Their experience coupled with close links to institutional funders ensures that they are well positioned to deliver projects for their own account, for clients and for partners.

3 Pre-application Consultations

3.1 Planning History

There is no relevant planning history in relation to this site.

3.2 EIA Screening & Pre-application Discussions

An Environmental Impact Assessment screening opinion was submitted to Staffordshire Moorlands District Council in October 2014.

The response deemed that a formal Environmental Impact Assessment (EIA) was not necessary for the proposed development, due to the reversibility of any potential impacts. The screening opinion highlighted that the impacts of the development would be limited to relatively few factors. Specifically stating that *“the proposal has a significant positive environmental benefit in that its core purpose is to generate energy sustainably from the naturally available light resource”*.

The screening opinion response outlined the need for robust assessments regarding potential impacts upon landscape character as a result of the development and in combination with existing development (cumulative impact). Due to the proximity of the proposal to Ancient Semi-Natural Woodland and/or County Site of Biological Importance, there is also a need to assess the impact upon existing ecology onsite.

3.3 Statement of Community Involvement

In line with national planning policy guidance, the relevant Parish Councils were contacted at the early stages of the project (Nov/Dec 2014) to provide an opportunity for the community to ask questions and have their input into the development of the scheme.

Invitations were sent to Dilhorne Parish Council where the proposed development is situated and to the adjoining Caverswall Parish Council, to attend a meeting/event, along with a project summary document. Both Parish Councils confirmed that they would discuss the proposal at their meetings.

Subsequently representatives from the Elgar Middleton Team attended the Dilhorne parish council meeting on the 20th January 2015 where information was presented and any concerns and questions were addressed.

The meeting was well attended with both councillors and members of the general public present. Councillors and local residents were able to question the developer directly and also raise any concerns relating to the proposed development. The main themes raised were; impact upon the local area during construction, vehicular access to the site during construction, potential flood risk and impacts on local springs.

Caverswall the adjoining parish council discussed the proposed development at their January 2015 meeting. At the time of writing this report no interest has been expressed by Caverswall parish council with regard to attendance of a meeting/event before submission of a formal application.

The applicant intends to continue correspondence throughout the determination with both parish councils and the clerks of each have direct contact details for the applicant.

4 Planning Policy Context

The planning policy to be considered in the examination of the proposal is derived from European Directive, National Planning Policy Framework, Planning Practice Guidance and the Staffordshire Moorlands Core Strategy, adopted March 2014. Consideration is also given to the recently published Staffordshire County-Wide Renewables / Low Carbon Energy Study 2010 and other non-statutory guidance documents.

4.1 European Policy

The availability of energy from renewable sources is increasingly important, specifically highlighted through laws brought in by the European Parliament Directive 2009/28/EC. As well as this, there is also pressure for obligating member states to commit to renewable energy targets, for the UK there is a commitment that by 2020, 15% of its energy will be sourced from renewable sources.

In the directive, paragraph (1) states:

‘The control of European energy consumption and the increased use of energy from renewable sources, together with energy savings and increased energy efficiency, constitute important parts of the package of measures needed to reduce greenhouse gas emissions and comply with the Kyoto Protocol to the United Nations Framework Convention on Climate Change, and with further Community and international greenhouse gas emission reduction commitments beyond 2012. Those factors also have an important part to play in promoting the security of energy supply, promoting technological development and innovation and providing opportunities for employment and regional development, especially in rural and isolated areas.’

For the UK to achieve their targets, a strategy is outlined in the Renewable Energy Strategy (RES) and Low Carbon Transition Plan. This involves utilising a range of energy production from wind, sunlight, water, sustainable biomass and some other methods, all of which will need necessary progression to achieve this target. There is a foreseeable need to transition to a low carbon economy and society with RES recommending that over 30% of the UK’s electricity should come from renewable sources.

In order to meet targets that have been set by the EU Directive there is a need set out by the Department for Energy and Climate Change (DECC) that *“deployment [of renewable energy sources] will need to be further increased”*.

4.2 National Policy and Guidance

National planning policy is contained within various different guidelines including the *National Planning Policy Framework (NPPF) March 2012* and the *Planning Practice Guidance (PPG) March 2014*. In particular, sections; *ID5 – Renewable and Low Carbon Energy*; *ID6 – Climate Change*; *ID8 – The Natural Environment*; and *ID18a – Conserving and Enhancing the Historic Environment* have been addressed. Supplementary policy has been prepared by the Department of Energy and Climate Change and that relevant to the proposals is contained within *EN1 (Overarching Policy Statement for Energy)* and *EN3 (National Policy Statement for Renewable Energy)*. Whilst intended for larger energy projects, some of the principles are applicable to smaller scale development.

4.2.1 Overarching National Policy Statement for Energy (EN-1) (July 2011)

This document emphasises the need for new energy infrastructure and the importance of having a good national supply, particularly of renewable and low carbon energy, given the country's legally-binding commitment to reduce greenhouse gas emissions by 80% by 2050. It explains in paragraph 3.4.1 that the UK is committed to sourcing 15% of energy from renewable sources by 2020. It goes on to underline (Para 3.4.5) the urgency of need and that it is imperative that renewable electricity generating projects are brought forward as soon as possible.

Paragraph 4.1.3 states that in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, account should be taken of:

- Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and
- Its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

The document also seeks to encourage applicants *“to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations”*. The site at Heywood Grange is situated within Grade 4 land in adherence with EN-1 Policy.

4.2.2 National Policy Statement for Renewable Energy Infrastructure (EN-3) (July 2011)

This Policy is primarily directed at larger scale energy proposals but the principles of assessing the impacts of new renewable developments are transferable to smaller scale developments such as the one proposed at Heywood Grange.

The document reiterates the desirability of good design which should be applied to all energy infrastructures as outlined in EN-1.

4.2.3 National Planning Policy Framework (NPPF) March 2012



National Policy
Framework March 2012

The NPPF encourages a proactive and supportive approach to economic development and renewable energy projects.

Paragraph 17 of the NPPF states that:

*“At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking”.*

This means planning authorities should, when decision-taking:

- Approve development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out of date, grant permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
 - Specific policies in the NPPF indicate development should be restricted.

Paragraph 7 explains that the planning system should facilitate sustainable development and has 3 dimensions: social, economic and environmental:

- **Economic Role** - Planning should contribute to building a strong, responsive and competitive economy. There should be sufficient land to identify and coordinate development and support innovation and technology. This will also apply to the provision of infrastructure
- **Social Role** - Planning should support strong, vibrant and healthy communities; and
- **Environmental Role** - Planning should contribute to the prudent use of natural resources and **help to mitigate and adapt to climate change working to move towards a low carbon economy.**

Paragraph 17 of the NPPF sets out 12 core planning principles, including:

- Proactively drive and support sustainable economic development
- Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and **encourage the use of renewable resources (for example, by the development of renewable energy)**
- Contribute to conserving and enhancing the natural environment and reducing pollution; and
- Encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, and/or food production).

Paragraph 18 explains that the Government is committed to securing economic growth and to **meeting the twin challenges of global competition and a low carbon future.**

Paragraph 28 requires planning policies to **support economic growth in rural areas** by taking a positive approach to sustainable new development. To promote a strong rural economy, planning should:

- **Support the sustainable growth and expansion of all types of business and enterprise in rural areas;** and
- **Promote the development and diversification of agricultural and other land-based rural businesses.**

Paragraph 93 states that, central to the economic, social and environmental dimensions of sustainable development, planning plays a key role in:

- Helping **to secure radical reductions in greenhouse gas emissions**
- **Minimising vulnerability and providing resilience to the impacts of climate change;** and
- **Supporting the delivery of renewable and low carbon energy and associated infrastructure.**

Paragraph 97 states that ***there is a responsibility on all communities to contribute to energy generation from renewable or low carbon sources.***

Local planning authorities should:

- Have ***a positive strategy to promote energy from renewable and low carbon sources***
- Design their policies to maximise ***renewable and low carbon energy development*** whilst ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts
- Consider identifying suitable areas for both renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources
- Support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and
- Identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

Paragraph 98 discusses the determination of planning applications, stating that local planning authorities should:

- Not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and
- Approve the application if its impacts are (or can be made) acceptable.

Paragraph 91 of the NPPF states that when a proposal is located within a Green Belt, *developers will need to demonstrate very substantial circumstances if projects are to proceed.* It is however outlined that projects may gain planning permission if such very special circumstances can encompass wider environmental benefits with *increased production of energy from renewable resources.* The proposed development at Heywood Grange would be temporary and reversible, therefore not altering the landscape in the long-term. The land would be secured and protected from other developments for 31 years, with a secured landscape and management plan to encourage further biodiversity on site. This scheme would therefore allow the beneficial use of the Green Belt and contribute significantly to the UK's climate change commitments with adherence to the National Planning Policy.

Full assessment of the Green Belt is considered within the submitted Visual Impact Assessment and Historic Environment Assessment.

4.2.4 Planning Practice Guidance (March 2014) (PPG)

In July 2013 the government issued a document "Planning practice guidance for renewable and low carbon energy" intended to help developers and councils understand the specific planning issues associated with renewable and low carbon energy projects and the governments stated policy in this regard.

ID5 – Renewable and Low Carbon Energy

Paragraph 001 advises that increasing the amount of energy from renewable technologies will contribute to a secure UK energy supply; reduce greenhouse emissions and stimulate investment in new jobs and businesses. It states that planning has an important role in

delivering renewable energy infrastructure where the local environmental impact is acceptable.

Paragraph 003 refers to the NPPF policy that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protection or the planning concerns of local communities.

The PPG advises that local and neighbourhood plans are important in helping to guide renewable energy development to appropriate locations, and local authorities need to identify the local potential for renewable to ensure they can encourage their development in the appropriate locations. **Paragraph 005** stresses that the views of local communities must be heard.

Paragraph 005 also advises that local authorities need to take in to account technological requirements alongside the potential impacts of renewable energy development, including cumulative impacts. For solar developments, this is particularly relevant given their rural locational requirements.

The PPG recommends local authorities identify areas suitable for renewable development in the local plan so that proposals outside these areas which have an unacceptable impact are not granted. The PPG encourages the provision of certainty in terms of identifying areas of potential and clearly indicating those factors which will be taken in to account. It reiterates that applications should only be granted where the impact is (or can be made to be) acceptable.

Paragraph 007 advises that local authorities should refer to the National Policy Statements on energy for criteria-based policy guidance. The criteria should include local topography; heritage assets conservation; local amenity; cumulative impact. The acknowledged national need for renewables is not an automatic override of other material considerations. The paragraph lists safety, ecological risks, reflected light, energy output and cumulative visual and landscape impacts as key considerations.

The PPG advises that inflexible buffer zones should be avoided.

Paragraph 013 considers the specific factors to be addressed in respect of photo-voltaic installations. It notes that these have the potential for mitigation and well-planned and well-screened developments can have minimal visual impacts. It also advises proper consideration of security aviation safety (in respect of glint and glare), landscape and heritage setting and agricultural use and potential for its continuation.

ID6 - Climate Change

Paragraph 001 reiterates the importance of planning in delivering appropriately-sited green energy development. It states that addressing climate change is one of the core land use planning policies of the NPPF and therefore local authorities are required to adopt proactive strategies to mitigate and adapt to climate change.

Paragraph 002 explains that local authorities have statutory obligations under law (Section 19 (A) of the planning and Compulsory Purchase Act 2004 and the Climate Change Act

2008) to include in their plans policies to secure the mitigation of, and adaptation to, climate change and to contribute towards national targets of greenhouse gas and carbon reduction.

Paragraph 003 goes on to advise that local authorities can contribute to the mitigation of climate change via reduced emissions by providing opportunities for renewable technologies.

ID8 – Natural Environment

Paragraph 001 deals with landscape and refers to the NPPF requirement that local authorities must recognise the intrinsic character and beauty of the countryside within their policies and decisions. Local plans should include policies for the conservation and enhancement of the natural environment, including landscape, for the wider countryside as well as designated areas.

Paragraph 007 addresses biodiversity, ecosystems and green infrastructure. It advises that local authorities must have regard to the conservation of biodiversity, and that they must adopt a pragmatic approach to fulfilling their statutory obligations in respect of designated sites and protected species in order to avoid unnecessary costs and burdens.

The PPG provides detailed guidance on how to assess the geological, geomorphological and bio-geographical character and ecological importance of the area and to follow and avoid, mitigate or compensate regime.

ID18a – Conserving and Enhancing the Historic Environment

Paragraph 001 advises that the appropriate conservation of heritage assets is an NPPF core principle.

Paragraph 003 states that conservation should be in a manner appropriate to their significance and that an active, flexible and thoughtful approach to conservation should be adopted.

“Significance” relates to the special architectural and historic interest of the asset and its national importance.

Paragraph 013 advises that the impact upon the setting of an asset is usually assessed through visual impacts although other impacts may need to be considered (such as historical context, noise or other nuisance).

The proposed development has taken this guidance into consideration during the site design process. Specifically the scheme can be said to adhere to this guidance in the following ways:

- The proposed scheme has been designed to allow continued agricultural use in the form of grazing should it be suitable, as well as enhancing the biodiversity of the site by following the measures outlined in the landscape and ecological management plan
- It has been shown in the accompanying Agricultural Land Classification assessment that the proposed development area comprises of land that cannot be described as the best and most versatile
- The quality of the land will be safeguarded as solar panels are passive and can be removed with minimal disturbance to the land

- The site is well screened from neighbouring uses shielding any potential impacts of glint and glare
- The proposal is for fixed ground mounted solar panels with no moving parts
- The security features proposed onsite are necessary from a public safety point of view
- No sensitive heritage assets have been identified within the proposed development site
- The proposal includes plans to enhance existing hedgerows and create new woodland areas to aid screening; and
- The generating potential of the site has been assessed as appropriate and the site design has taken into consideration measures which maximise the potential to capture solar irradiance.

4.3 Staffordshire Moorlands District Council, Core Strategy Development Plan Document March 2014

The Core Strategy was adopted on the 26th March 2014 and is the key Local Development Framework (LDF) document. It is a strategic District wide plan which influences how and where the Staffordshire Moorlands will develop in the future. It sets out what the District Council would like to achieve in each of the main towns and the rural areas outside the Peak District National Park.

The Core Strategy is based upon the principle of sustainable development. Spatial Objective 2 states *“to create a District where development minimises its impact on the environment, helps mitigate and adapt to the adverse effects of climate change and makes efficient use of resources.”*

Policy SS1 Development Principles:

“The council will expect the development and use of land to contribute positively to the social, economic and environmental improvements of the Staffordshire Moorlands in terms of delivering, in partnership with other agencies and services;

- *....development which maintains the distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings;*
- *Development that is undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas both now and for future generations;*
- *Development which secures high quality, sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduce carbon emissions.*

All proposals for development will be considered in the context of the District-wide Spatial Strategy and with regard to both its direct and indirect cumulative impact over the longer term. New development will make the best use of previously developed land and buildings will follow a sequential approach to the sustainable location of development.”

Policy SS1a Presumption in Favour of Sustainable Development:

“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental condition in the area.

Planning applications that accord with the policies in this Core Strategy (and where relevant, with policies in neighbouring plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision when the Council will grant permission unless material the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account weather:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted”.*

Policy SS6c Other Rural Areas Strategy:

“The other rural areas comprise the countryside and the green belt outside of the development and infill boundaries of the towns villages, as defined in the Site Allocations DPD, including those small settlements and dispersed developments not identified in policies SS5, SS6a and SS6b.

These areas will provide only for development which meets an essential local need, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. The Council and its partners will achieve this through the following actions ... enhance and conserve the quality of the countryside by:

Giving priority to the need to protect the quality and character of the area and requiring all development proposals to respect and respond sensitively to the distinctive qualities of the surrounding landscapes;...

Ensuring renewable energy schemes are of an appropriate scale, type and location...

Encouraging measures which protect and enhance the biodiversity, geological resources and heritage of the District.”

Policy SD2 Renewable/Low-Carbon Energy:

“The District will strive to meet part of its future energy demand through renewable or low-carbon energy sources (which could be through a variety of technologies, for example wind power, solar energy, biomass etc.), in line with current evidence which identifies the feasibility of these forms of energy across the District. This will be achieved by supporting small- and large- scale standalone renewable or low- carbon energy schemes, subject to the following considerations:

- *The degree to which the scale and nature of a proposal impacts on the landscape, particularly having regard to the Landscape Character Assessment and impact on the Peak District National Park (taking into account both individual and cumulative effects of similar proposals);*
- *The degree to which the developer has demonstrated any environmental/economic/social benefits of a scheme as well as how any environmental or social impacts have been minimised (e.g. visual, noise or smell);*
- *The impact on designated sites of European, national and local biodiversity and geological importance in accordance with policy NE1;*
- *The impact on the amenity of residents and other interest of acknowledged importance, including the historic environment;*
- *The degree to which individual proposals reflect current local evidence regarding the feasibility of different types of renewable or low-carbon energy at different locations across the District.”*

Policy SD4 Pollution and Flood Risk

“The Council will ensure that the effects of pollution (air, land, noise, water, light) are avoided or mitigated by refusing schemes which are deemed to be (individually or cumulatively) environmentally unacceptable and by avoiding unacceptable amenity impacts by refusing schemes which are pollution-sensitive adjacent to polluting developments, or polluting schemes adjacent to pollution sensitive areas, in accordance with national guidance...”

Policy DC2 the Historic Environment

“The Council will safeguard and, where possible, enhance the historic environment, areas of historic landscape character and interest of acknowledged importance, including in particular scheduled ancient monuments, significant buildings (both statutory listed and on a local register), the settings of designated assets, conservation areas, registered historic parks and gardens, registered battlefields and archaeological remains by:

- 1. Resisting development which would harm or be detrimental to the special character and historic heritage of the District’s towns and villages and those interests of acknowledged importance.*
- 2. Promoting development which sustains, respects or enhances buildings and features which contribute to the character or heritage of an area and those interests of acknowledged importance through the use of conservation area appraisals, design statements archaeological assessments, characterisation studies and Masterplanning.*
- 3. Preventing the loss of buildings and features which make a positive contribution to the character or heritage of an area through appropriate reuse and sensitive development, including enabling development, unless their retention is not viable or there would be substantial planning benefits to outweigh the loss.”*

Policy DC3 Landscape and Settlement Setting:

The Council will protect and, where possible, enhance local landscape and the setting of settlements in Staffordshire Moorlands by:

- 1. Resisting development which would harm or be detrimental to the character of the local and wider landscape or the setting of a settlement as identified in the Landscape and Character Assessment;*
- 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 Character Assessment;*
- 3. Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape;*
- 4. Identify through the Site Allocations DPD and protecting from inappropriate development , areas of visual open space where the intention will be to retain the land’s open and undeveloped appearance. Where appropriate the Council will seek public access agreements with the land owners and seek proposals for the enhancement or improvement of these areas as part of the green infrastructure network in accordance with policy C3. In exceptional cases, limited development of areas of visual open space may be acceptable where this will bring about overriding improvements to the space itself;*
- 5. Recognising and conserving the special quality of the landscape in the Peak District National Park, and ensuring that development does not adversely affect the wider setting of the National Park.”*

Policy R1 Rural Diversification:

“All development in the rural areas outside the development boundaries of the towns and villages will be assessed according to the extent to which it enhances the character, appearance and biodiversity of the countryside, promotes the sustainable diversification of the rural economy, facilitates economic activity, meets a rural community need and sustains the historic environment.

Appropriate development should not harm the rural character and environment quality of the area or any sites designated for their nature conservation, or historical interest by virtue of the scale, nature and level of activity involved and the type and amount of traffic generated or by other effects such as noise and pollution.

Wherever possible development should be within suitably located buildings which are appropriate for conversion. Where new or replacement buildings are involved, development should have minimal impact on the countryside and be in close proximity to an existing settlement.

Within the Green Belt, inappropriate development which is otherwise acceptable within the terms of this policy, will still need to be justified by very special circumstances.”

Policy NE1 Biodiversity and Geological Resources:

“The biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development by:

- 1. Resisting any proposed development that could have an adverse effect on the integrity of a European site alone or in combination with other plan or projects unless it can be demonstrated that the legislative provisions to protect such sites can be fully met.*
- 2. Conserving and enhancing any Site of Special Scientific Interest. The Council will not permit any development proposals which would directly or indirectly (either individually or in combination with other developments) have an adverse effect on a Site of Special Scientific Interest.*
- 3. Conserving, and enhancing regional and locally designated sites. The Council will not permit any development proposal which would directly or indirectly result in significant harm to geological and biodiversity conservation interests including ancient woodland, unless it can be demonstrated that:*
 - There is no appropriate alternative site available; and*
 - All statutory and regulatory requirements relating to any such proposal have been satisfied; and*
 - Appropriate conservation and mitigation measures are provided; or if it is demonstrated that this is not possible*
 - The need for, and benefit of, the development is clearly demonstrated to clearly outweigh the need to safeguard the intrinsic nature conservation value of the site and compensatory measures are implemented.*
- 4. Supporting opportunities to improve site management and increase public access to wildlife sites including supporting the objectives of the Staffordshire County Council Rights of Way Improvement Plan.*
- 5. Ensuring development where appropriate produces a net gain in biodiversity, and ensuring that any unavoidable impacts are appropriately mitigated for.*
- 6. Ensuring development promotes the appropriate maintenance, enhancement, restoration and/or re-creation of biodiversity through its proposed nature, scale, location and design. The Staffordshire Moorlands Biodiversity Opportunity Map, in conjunction with the*

Staffordshire Biodiversity Action Plan, will be used to guide biodiversity enhancement measures to be included in development proposals as appropriate to the nature and scale of development proposed and other environmental interests, in particular supporting opportunities to increase grassland and heathland habitats including supporting targets in the UK and Staffordshire Biodiversity Action Plan.

- 7. Protecting and enhancing habitats and species of principle importance for the conservation of biodiversity as identified in legislation, and recognising and implementing appropriate measures, including landscape-scale conservation management, to take account of the fact that the distribution of habitats and species will be affected by climate change.*
- 8. Recognising the value of the natural environment for sport and leisure activities and the need to manage such activities to ensure there is no conflict.*
- 9. Ensuring the provision and protection of green infrastructure networks in line with Policy C3.”*

Policy T1 Development and Sustainable Transport:

“The council will promote and support development which reduces on the private car for travel journeys, reduces the need to travel generally and helps deliver the priorities of the Staffordshire Local Transport Plans, where this is consistent with other policies. This will be achieved by:

- Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development...”*

4.4 Other Non-Statutory Guidance Documents

4.4.1 The Staffordshire County-Wide Renewables / Low Carbon Energy Study 2010

The Staffordshire County-wide Renewable / Low Carbon Energy Study was produced in 2010 by Camco on behalf of the authorities of Cannock Chase, East Staffordshire, Lichfield, Newcastle-under-Lyme, South Staffordshire, Stafford, Staffordshire Moorlands, Tamworth and Staffordshire County Council.

The aim of the study is to inform the partner authorities about the technical potential, the viability and the deliverability of various renewable and low carbon options through the preparation of a local evidence base.

The report offers the following summary statements in relation to the potential for low carbon / renewable energy generation;

“There are significant low carbon energy generation resources within the study area which are estimated to be able to provide between 8% and 11% of energy consumption by 2021. This is arguably within the range required for the local areas to support the national target of 15% (with large centralised generation significantly contributing towards this and thereby displacing the need for additional local generation) by the same period.”

The report doesn't consider large scale ground mounted solar PV systems as an option, at the time of the publication of this report large scale ground mounted PV systems were not economically viable.

With regard to specific renewable energy technologies the report states that *“each authority should seek to maximise the use of the low and zero carbon resource available to them and where they do not have access to specific resources such as wind energy or biomass then they should explicitly focus on those other solutions that are possible, such that they make a fair contribution.”*

4.4.2 BRE, Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems

This guidance produced by the Building Research Establishment, National Solar Centre provides best practice planning guidance in respect of how large ground mounted arrays are developed setting out planning considerations and requirements.

The guidance acts as a focal point for the national planning policy associated with development of ground mounted solar schemes. The guidance within this document relating to planning application considerations has been followed during the site design process and construction of this planning application.

5 Conclusion

The NPPF wholeheartedly supports renewable energy development. The government view is clear that planning is fundamental to facilitating the national carbon reduction strategy. Accompanying documents (EN1, EN3 and the suite of online PPGs) underpin the basic positive encouragement of such development with helpful guidance on how to assess proposals.

The NPPF seeks to promote community involvement in the planning system and goes so far as to say that there is a responsibility upon communities to contribute to the generation of energy from renewable/low carbon sources. The NPPF prioritises sustainable economic development, and positively supports rural economic projects such as farm diversification.

This planning policy statement has shown that the proposed development is an integrated scheme, which:

- Adheres to the core principles of sustainable development
- Adheres to all relevant planning policy and guidance; and
- Offers a range of Environmental and Economic benefits.

Whilst the need to assess the impact of solar PV energy developments is recognised by both national and local policy, it is clear that significant importance is attached to the contribution renewable energy developments make to strategic sustainable development targets.

The NPPF strongly advocates a positive approach, commenting that renewable energy developments are vital to meeting the government's climate change commitments. The proposals do not contravene any policies and do not cause unacceptable harm. This proposal represents an opportunity for Staffordshire Moorlands District Council to contribute to the UK's climate change commitments and adhere to National Planning Policy.

The application is supported with standalone surveys addressing, *inter alia*, landscape and visual impact, ecology, flood risk and heritage assets.