

Our Ref: 397-05-PV

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East Staffordshire Borough Council Planning Services  
Box 8045  
Burton upon Trent  
Staffordshire  
DE14 9JG  
(by email only)

15 April 2021

Dear Sir/Madam,

**Proposed Solar Farm on Land at Field Head Farm, Uttoxeter  
The Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

Introduction

I write, under Section 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), to request an EIA Screening Opinion in relation to the proposed development of “solar farm and associated development” (the Proposals) at the location described above (the Site).

The Proposals fall under Schedule 2, Part 3 (a) of the EIA Regulations as they are for the installation for the production of energy which has an area of greater than 0.5 hectare. This request includes a plan sufficient to identify the land, a description of the Proposals (physical characteristics of the Proposals and a description of the location of the Proposals), a description of the aspects of the environment likely to be significantly affected, a description of the likely significant effects and other relevant information including features and measures taken to avoid or prevent what might have otherwise been significant adverse effects.

Based on the content of this request and the selection criteria in Schedule 3 of the EIA Regulations (characteristics of the development, location of development and types and characteristics of the potential impact), it is considered that the Proposals will not have a significant effect on the environment and the Proposals are, therefore, not EIA development. It is noted that the operational solar farm to the north was not subject to an EIA.

The Site

The Site is agricultural land in the open countryside and has a gently southward sloping topography. The Site is approximately 16 hectares in area and is not located within a “sensitive area” as defined by the latest EIA Regulations. The Site falls mostly within Flood Zone 1, with the Site’s margins along the brooks residing in Flood Zones 2 and 3.

The Site lies approximately 500m north of the settlement of Combridge and c.2km west of the village of Rocester. The Site's boundaries appear to comprise of thick trees and copse to the east and south, and hedgerow along the west. The Site lies adjacent to the JCB Golf and Country Club to the north. New native species hedges and trees will be planted along any exposed boundaries of the Site, and will be allowed to grow up to 3m in height to provide sensitive natural screening which is in-keeping with the surrounding area's character. Where hedging already exists, this will be 'gapped up' and allowed to grow to contribute towards the screening of the Site.

Brook and Alders Brook run along the south and eastern boundary of the Site respectively, and adjoin at Combridge Farm to the south.

An overhead power line cuts across the Site from Field Head Farm to Cornhill Farm to the east, with four masts located on the Site.

There are no PROW on the Site, however it appears two PROW run from Combridge Lane, opposite the north-eastern portion of the Site, north through the golf course towards the settlement of Alders.

### Designations and Allocations

Based on online mapping data, the Site lies almost entirely within Flood Zone 1, with the eastern and southern boundaries of the Site, where the brooks run, located in Flood Zone 2 and 3. These would be avoided for the purposes of locating panels and associated infrastructure.

It is noted that the Site lies within the buffer zone of the Saltersford Lane Sites of Special Scientific Interest (SSSI) which lies approximately 3.4km north of the Site. The Alders Ancient Woodland (AW) lies c. 115m to the east of the Site. Moreover, Nothill AW and Cotton's Wood and The Alders AW lie c.1km and 1.5km respectively south-west of the Site.

The Site lies to the east of three Grade II Listed properties: "Fieldhead Farmhouse", "Stables and Cartshed Approximately 10yards West of Fieldhead Farmhouse", and "Cowhouses, Granary and Stable Approximately 15yards North of Fieldhead Farmhouse". A number of further listed properties lie over 1km away from the Site, and are not likely to have intervisibility with the Site. The nearest Scheduled Monument to the Site is the "Site of Rocester Abbey and part of Roman town" located over 2.5km to the north-east in Rocester.

A number of non-statutory Historic Environment Records (HER) are located on the Site including the medieval "Ridge and Furrow, Fieldhead Farm" which identified cropmark remains of the ridge and furrow identified from an aerial photo taken in 1963. The Fieldhead Farmhouse also has a number of heritage records recognising the importance of the 18<sup>th</sup> century origin of the farmstead, and "gable-lit attic" of the farmhouse which is dated to circa 1700.

### Description of the Proposals

At this stage, it is anticipated that a solar farm of up to 12MW export would be developed, potentially powering approximately 3,600 homes annually for 40 years. It is anticipated that the Site will be accessed via the unnamed track to Combridge Road to the north. The Proposals will be connected to the grid via the Point of Connection at Rocester to the north-east.

Solar panels will be mounted on metal frames, secured to the ground by metal piles. The maximum height of the panels above ground level (AGL) will be three metres. The panels will face due south and will be dark blue or black in appearance. The bottom of the panels will be a minimum of 80cm AGL and

they will be positioned in rows with approximately a minimum of three metres of space from front to back, to ensure the land can remain in agricultural use, for example, through sheep grazing.

The Proposals will be enclosed by a two-metre wooden post and metal wire deer fence. CCTV cameras will be positioned along the fence line, every 50 metres at most. There will be internal access tracks made of crushed, permeable stone, approximately three metres in width. No long stretches of boundary screening (such as hedges or trees) will be removed, including the adjacent deciduous woodland, although small stretches of internal hedge may need to be removed or trimmed to provide access throughout the Site for vehicles and/or fencing.

A number of small buildings will be required to house inverters, transformers, substations, communications equipment, storage and batteries.

The Proposals will not generate any waste once operational. During construction and operation, suitable waste and recycling facilities will be put in place. Relevant recycling and waste regulations and policy will be followed, including the Waste Electrical and Electronic Equipment Directive.

There will be a small number of low-level lights above/near the substation which will be manually operated, small and downward directional, for emergency use/maintenance only. There will be minimal noise levels from fans in the inverter cabins and battery units. The Proposals do not require substantial earthworks. There are no anticipated human health impacts and minimal risk of accidents during operation. Access, traffic and transport issues will be carefully managed during construction in line with the relevant legislation, policy and guidance.

### Effects

In terms of **landscape and visual effects**, the Site is not anticipated to have significant effects on nearby landscape designations. The Site appears well screened from nearby settlements and villages like Combridge and Rocester by the trees, hedgerow and copse along the eastern and southern boundary, noting what appears to be heavy screening along Combridge Lane to the north-east. The topography of the land means there may be limited views from Cornhill Farm to the south, and from Field Head farm, however these can be sufficiently identified and mitigated against through a standard Landscape and Visual Impact Assessment (LVIA). A number of scattered farms and properties are also noted to the south-west. However, the distance between the residential dwellings and the Site and the existing and proposed new native species rich hedges and trees along the boundaries of the Site would screen the Proposals, and mitigate against any landscape and visual impacts. Existing hedges will also be allowed to grow in height to screen the Proposals, and where there are gaps in existing boundary screening, these will be 'gapped up' as required and appropriate.

There are no PROW on the Site; however, it is noted that two PROW run from Combridge Lane to the north of the Site up to the settlement of Alders, through the golf course. The PROW will continue to enjoy views over the golf course, and PROW users, on account of the hedging and trees along Combridge Lane as well as the topography of the land, are unlikely to experience significant views over the Proposals. Therefore, whilst there may be likely to be impacts on landscape, these are not considered significant. Landscape and visual impacts of solar farms are well understood, and can be fully assessed through a LVIA with accompanying photomontages.

With regards to **land use and land grade** effects, whilst the Site is agricultural land, it will remain in agricultural use (alongside the Proposals). The Site is understood to be located within Grade 3 land from high-level mapping. Were the Proposals to be partly located on Best and Most Versatile (BMV) agricultural land, a 'sequential test' would be applied to demonstrate that poorer quality land was not

readily available. A full and detailed Agricultural Land Classification assessment will be undertaken as part of the planning application. This is a standard and established process with clear outcomes to consider well understood planning issues. As such, it is considered that the Proposals will not result in significant effects in terms of land use and land grade.

It is noted that the approved solar farm to the north of the Site is was assessed as Grade 3b land.

In terms of **flooding and drainage** effects, the Site is mostly within Flood Zone 1. Nonetheless, a detailed Flood Risk Assessment will be conducted as part of the planning application and will also set out measures to mitigate flood risk on Site and neighbouring land, including a SuDS to reduce surface run-off rates to pre-developed rates. The Proposals will be designed to take flooding and drainage issues into account. Access tracks will be permeable and there will be limited if any new impermeable ground coverings. Swales and scrapes will be incorporated into the drainage design to ensure surface water drainage is effectively managed. Overall, it is considered that with appropriate mitigation, there will not be significant impact on the environment as a result of the Proposals in terms of flooding and drainage issues.

**Heritage** effects, including archaeology, have been considered. The Grade II Listed “Fieldhead Farmhouse”, “Stables and Cartshed Approximately 10yards West of Fieldhead Farmhouse”, and “Cowhouses, Granary and Stable Approximately 15yards North of Fieldhead Farmhouse” are noted to the west of the Site. A number of further listed properties lie over 1km away from the Site, and are not likely to have intervisibility with the Site. The nearest Scheduled Monument to the Site is the “Site of Rocester Abbey and part of Roman town” located over 2.5km to the north-east in Rocester.

It is considered that potential views between the listed buildings and the Site can be successfully screened both through a carefully landscaped design, setting back the panels, and through proposed trees and hedging, noting that the Field Head farmstead is already partly screened by a small copse to the south of the farmstead. It is also noted that the buildings’ immediate setting already includes modern farm buildings. The relationship between the three buildings is considered likely to be the main source of value in terms of their setting, and this will not be affected. The existing and proposed screening as part of the Proposals are deemed sufficient that impacts on designated assets will not be significant and can be appropriately mitigated against. Therefore, due to the southward sloping topography, as well as existing and proposed screening, and noting the low level nature of the Proposals, it is concluded that significant impacts on the setting of these three listed buildings are not anticipated.

A desk-based heritage assessment will be undertaken as part of the planning process to fully assess the impacts on the Field Head listed buildings as well as other heritage assets.

A number of non-statutory Historic Environment Records (HER) are located on the Site including the medieval “Ridge and Furrow, Fieldhead Farm” which identified cropmark remains of the ridge and furrow identified from an aerial photo taken in 1963. The Fieldhead Farmhouse also has a number of heritage records recognising the importance of the 18th century origin of the farmstead, and “gable-lit attic” of the farmhouse which is dated to circa 1700. However, the impact on archaeology is unlikely to be significant due the nature of the Proposals and the potential for non-intrusive mitigation measures to be deployed if necessary, so there will not be significant effects on archaeology.

In terms of **noise and amenity** effects, there is limited noise from fans on inverters and batteries, and the inverters will not operate at sensitive times (i.e. at night) as the Proposals will not generate power during the hours of darkness. Glint and glare issues will be minimal as the Site is not directly overlooked from the south.

With regards to **access, traffic and transport** effects, no significant effects are anticipated. There will be regular traffic movements during construction however during operation and maintenance visits to the Site will be infrequent. Construction is expected to last approximately six months and deliveries would be restricted to usual working hours. It is anticipated that traffic will be accessed via the existing unnamed access track from Combridge Lane and will result in minimal disruption.

Overall, it is considered that effects would not be significant.

With regards to **ecology and biodiversity**, as noted above, the Site is in agricultural use and is not in a sensitive area as defined by EIA Regulations 2017. The Site is situated within the buffer zones of the Saltersford Lane SSSI. Moreover, the Alders Ancient Woodland (AW) lies c. 115m to the east of the Site, and Nothill AW and Cotton's Wood and The Alders AW lie c.1km and 1.5km respectively south-west of the Site.

The boundaries and margins of the Site, including the Alders and Nothill Brook, and the nearby ponds, mature trees, hedges and other areas of flora, would be protected during construction and operation. There will be limited, if any, removal of internal hedges, and additional hedge planting would be put in place to help screen the Proposals and contribute to the biodiversity of the Site and its surroundings. Biodiversity enhancements such as bat boxes, wild flower planting areas and new native species hedges will improve the biodiversity value of the Site and its surroundings. Taking all of this into consideration, including the distance to sensitive areas defined in the EIA Regulations, it is considered that the Proposals will not result in significant adverse effects on ecology or biodiversity.

In terms of potential **cumulation** with other existing or proposed development, specifically renewable energy schemes, it is noted that the Proposals lie approximately 500m south of the now operational Woodhouse Fields Farm Solar Farm. The approved solar farm is already in operation and therefore there are not likely to be any cumulative construction impacts. Moreover, as it is already operational, the cumulative visual impacts can be better understood. This would be assessed through a Landscape and Visual Impact Assessment. The landscape of the Site and its surroundings are considered to be appropriate for solar farm deployment due to the topography of the land and the ability to use mature plantation to screen the Site, and there is not likely to be any intervisibility between the two sites.

In conclusion, on account of the topography, existing and proposed screening as well as the appropriate setting for the Proposals, no significant cumulative effects and transboundary effects are anticipated.

Solar farm (and renewable energy schemes generally) issues and effects are well understood. The issues associated with solar farms are not considered complex. Impacts are considered to be generally low intensity. The probability, expected onset, duration and frequency of the impacts are likely to be accurately determined. The Proposals are fully reversible and the Site can be restored to its current condition.

Based on all of the above it is considered that the effects of the Proposals will not be significant in terms of the EIA Regulations, and the Proposals are not EIA development.

#### Proposed Planning Application

It is proposed that any future application is accompanied by the following information, which is considered suitable to assess the Proposals. The Council's feedback as need be on this would be appreciated.

- Site location plan, site design and elevation drawings;
- Indicative landscaping plan;

- Traffic Management Plan;
- Landscape and Visual Impact Appraisal including photomontages;
- Ecology assessment;
- Heritage assessment;
- Flooding and drainage assessment, and surface water management proposals;
- Land Grade report; and
- Planning, Design and Access Statement

Conclusion

In conclusion, I trust the above and enclosed is clear and that the Council agree that the effects of the Proposals will not be significant. I look forward to hearing from you.










Yours faithfully,

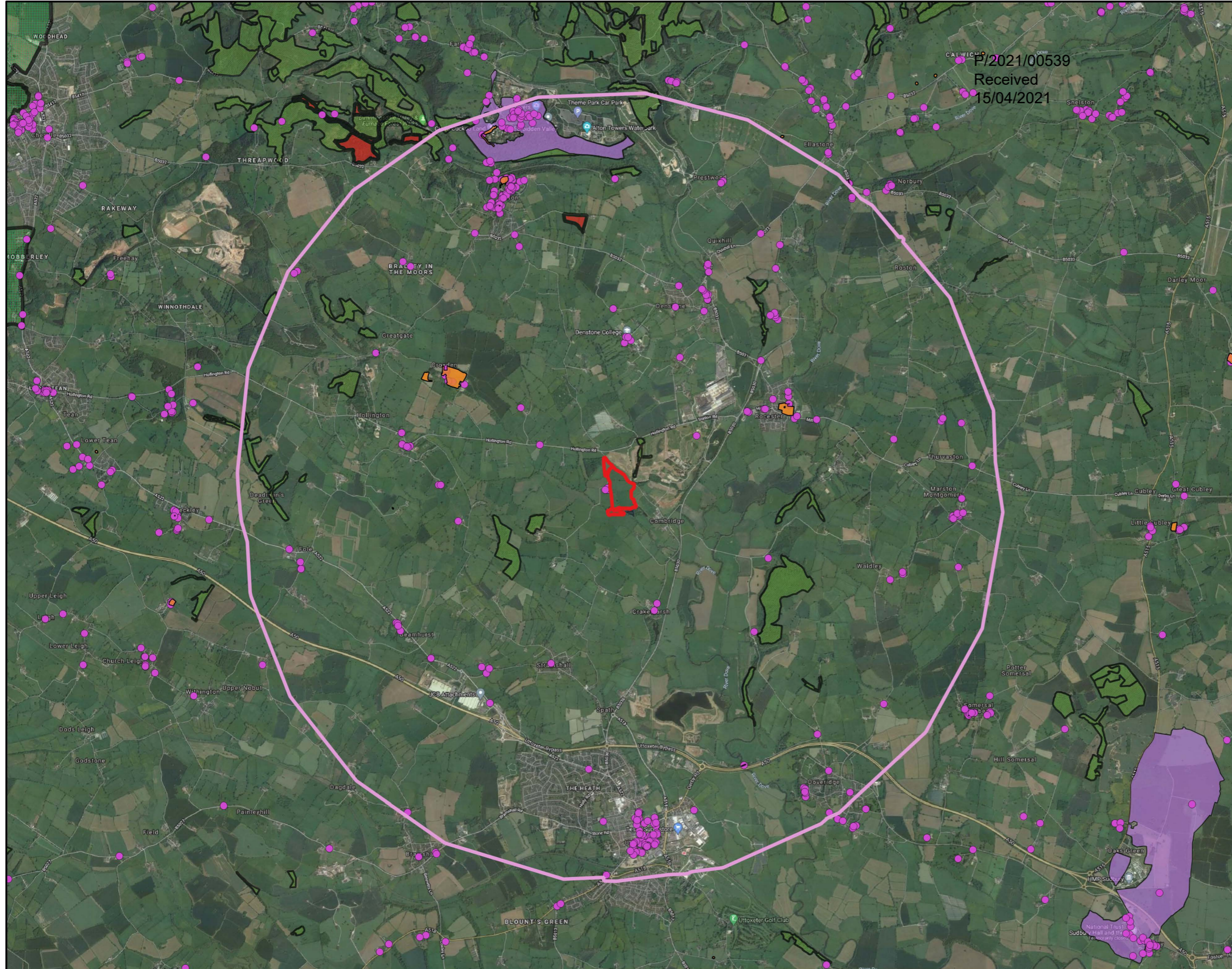
Isabella Marcucci  
Assistant Planner

Encl: Location Plan (14/04/2021)  
Designations and Allocations Plan (14/04/2021)  
Existing Consents plan (14/04/2021)

P/2021/00539  
Received  
15/04/2021

**Legend**

-  5km Buffer
-  Red Line Boundary
- Designations**
-  Scheduled Monuments 20181011
-  Listed Building
- DESIGNATIONS**
-  Ancient Woodland
-  Green Belt
-  Park or Garden
-  Scheduled Monuments
-  Site of Special Scientific Interest



Scale: 1:50,000  
Date: 14/4/2021

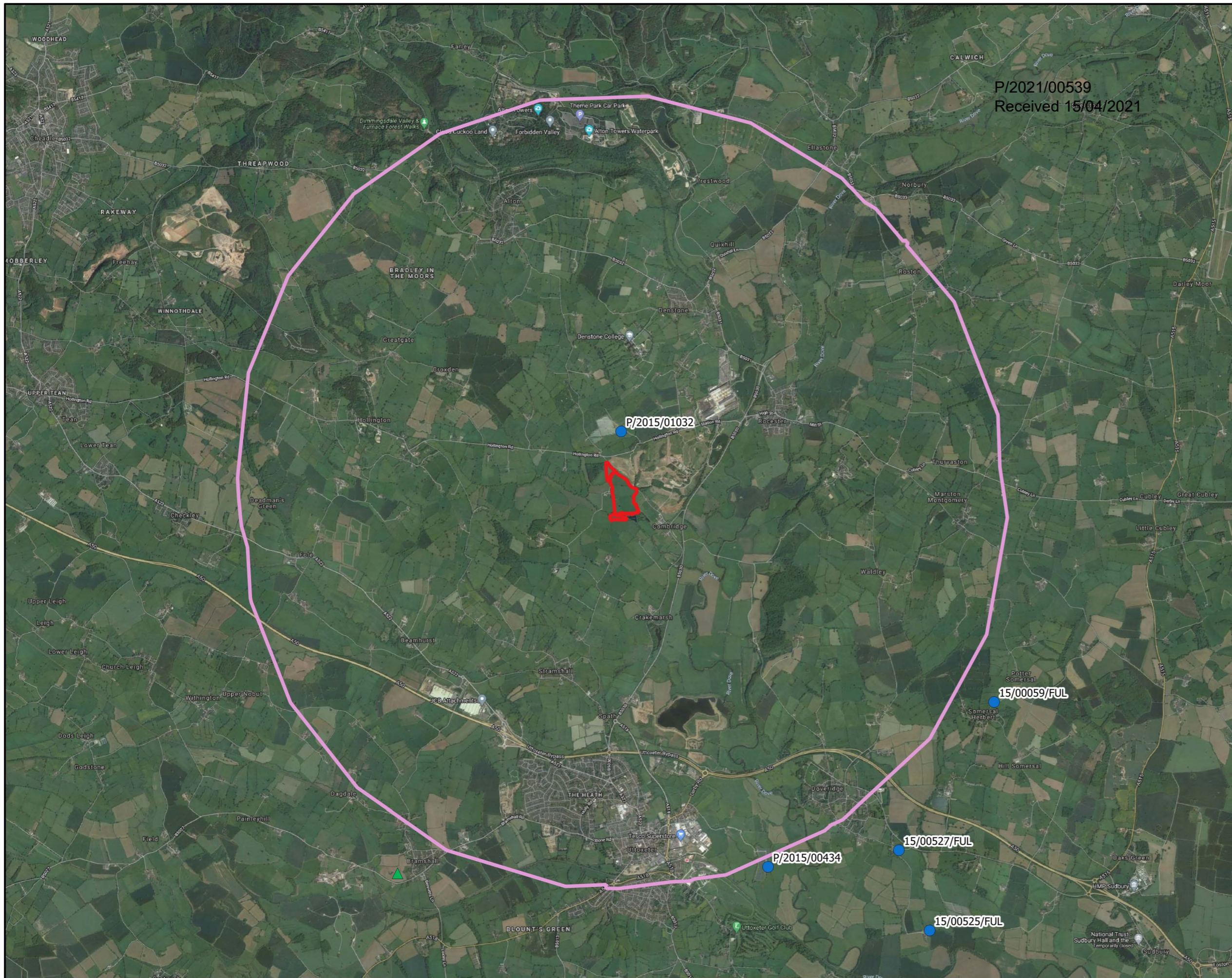
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### Legend

- 5km Buffer
- Red Line Boundary

### Solar and Wind Schemes Dec 2019

- Solar Photovoltaics
- Wind Onshore



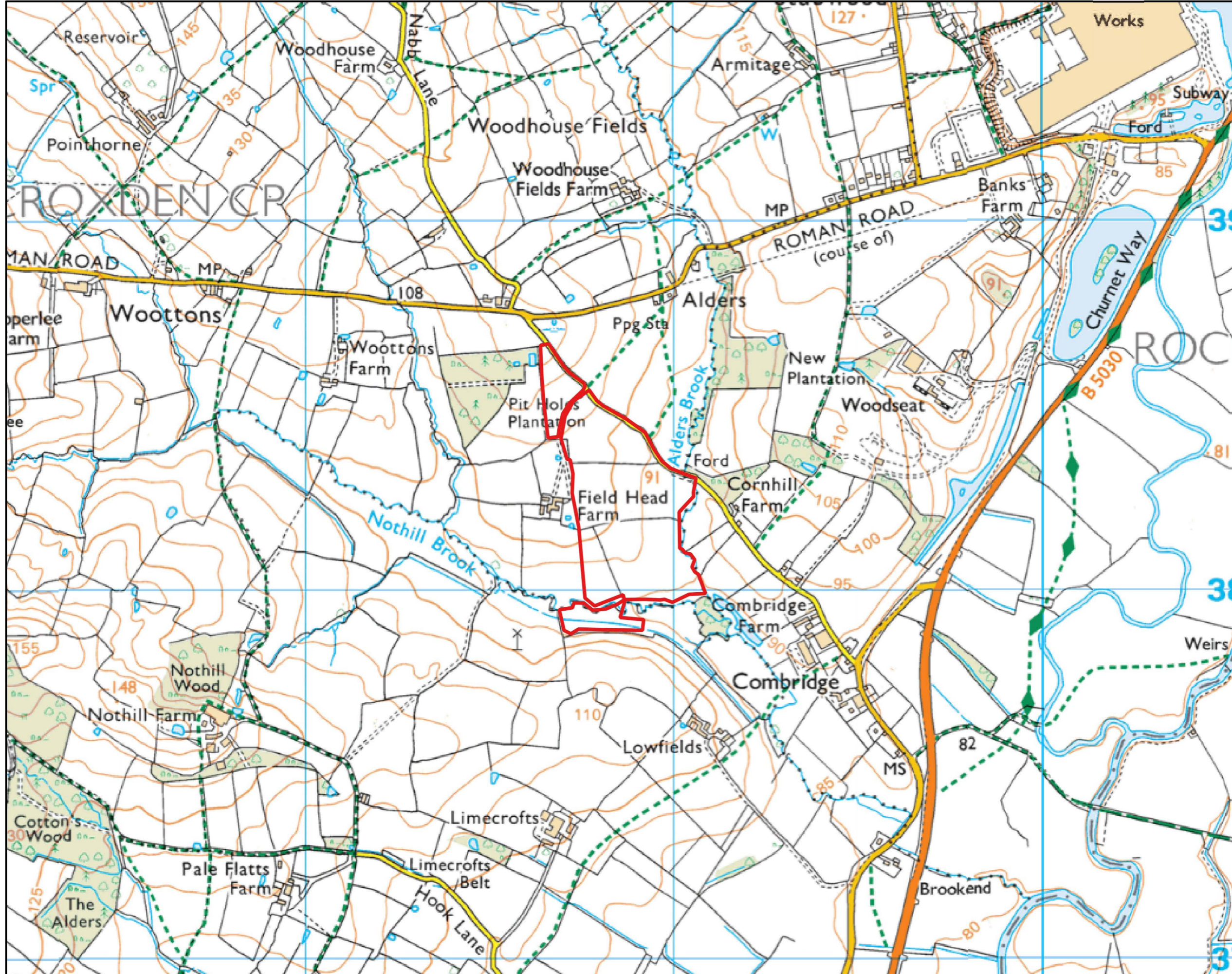
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Legend

Red Line Boundary

P/2021/00539  
Received 15/04/2021



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Date: 14/4/2021