

P/2022/00671  
Received 01 June 2022

SPDSTUDIO  
SUSTAINABLE . PLANNING . DESIGN



# Rolleston Park Solar Farm 2

Supporting EIA Screening Opinion Statement

Prepared by SPD Studio on behalf of Push.

**PLANNING** ARCHITECTURE ENGINEERING RENEWABLES



**1. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Request for a Screening Opinion in Respect of the Proposed Installation of a Solar PV Site.**

We write to seek a formal Environmental Impact Assessment screening opinion in respect of the proposed installation of an unmanned solar photovoltaic generator to provide renewable electricity to the Borough of East Staffordshire and operated by Push.

The site is shown on the accompanying plan and is sufficient to identify the land to which this screening request relates. The land is currently used for partially seasonal arable crops and grassland, and is approximately 22.13 hectares in size.

The site has been identified by the landowner and the project developer as suitable for this purpose, as the generator would make a meaningful contribution to East Staffordshire Borough Council's carbon reduction target of achieving net zero by 2040.

We wish to obtain a formal screening opinion from East Staffordshire Borough Council to confirm that an Environmental Impact Assessment is not required.

This request is made under Regulation 6 (2) of the EIA Regulations 2017 (as amended).

In accordance with Regulation 6(2) of the EIA Regulations we have provided the following information as part of this screening opinion:

- (a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular–
  - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
  - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from–
  - (i) the expected residues and emissions and the production of waste, where relevant; and
  - (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
- (e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

In determining whether a Proposed Development requires an EIA, the Local Planning Authority 'East Staffordshire Borough Council' is required to following Part II, Section 4 of the Regulations and the relevant schedules. The Regulation states that the Local Planning Authority shall adopt an opinion within 21 days of receipt of a screening request.

## 2. Development Introduction

### Application Site

The application site is located at Land at Rolleston Park, Tutbury, Burton-On-Trent, DE13 9HQ (Easting (x) 421745, Northing (y) 327114).

The Proposed Development site is located on agricultural land, made up of three land parcels. The Rolleston Park Solar Farm lies adjacent west of the proposed site and was approved for planning in 2014 by East Staffordshire Borough Council under planning reference P/2014/00830. The Proposed Development would lie within a large parcel of privately owned land over which there are several footpaths within close proximity.

The site is approximately 22.13ha, although the developable area would be reduced as the total site area includes significant spacing between each row of solar panels, and also allows for buffer zones mainly on the perimeter and spaces for access tracks.

The nearest residential property is situated across the Burton Road (A511) approximately 75m to the east and is well screened by mature trees. The north of the site is enclosed fields and Burton beyond. Towards the southwest of the site is Rolleston Park Farm, with Rolleston Park Solar Farm directly west reducing visual impact. The sites topography is relatively flat, sloping gentle down to the southwest.

As part of the Rolleston Park Farm application (P/2014/00830), the land area that makes up the Proposed Development was shortlisted for solar development (see parcels 4, 5, and 7 in the P\_2014\_00830\_Site Constraints Plan of the P/2014/00830 application), but after further analysis were discounted due to issues regarding existing gas main with transects adjacent to the site.

The application site would be accessed via private drive off Burton Road (A511) that forms the eastern boundary of the site. The access point is to be retained after the construction period for maintenance purposes. Tutbury 16 Footpath lies along this private driveway leading to Rolleston Park Farm.

### Proposed Development

This proposal is for the temporary erection of multiple rows of solar photovoltaic (PV) arrays, for a duration of 40 years. The installed capacity would be approximately 12MWac, though this is subject to final detailed design and site layout.

The solar panels would be attached to mounting frames at an angle of between 15-30 degrees to optimise daylight capture. The mounting frames would be of either galvanised steel or aluminium and would have a rough matt finish rather than a polished finish. The mounting frames are attached to piles driven into the ground, so no concrete foundations are required. This minimises the long-term impact on the soil and does not require prior excavation. The mounting piles would present a negligible cross section and would not affect the flow of any flood waters.

The Proposed Development would require the installation of a number of inverters and transformers in order to convert the generated electricity from direct to alternating current and to deliver it to the local power grid. The specific choice of inverters, transformers and other electrical

equipment has not yet been finalised and depends on the detailed design by the construction contractor.

The Proposed Development would be bounded by a 2.2m high deer fence. The perimeter would also be secured by thermal cameras mounted on posts approximately 4m high and located approximately every 50m along the perimeter. No artificial lights would be required to support the CCTV system, but the cameras would be fitted with speakers and microphones allowing any trespasser to be challenged by the CCTV operator.

The Proposed Development acknowledges the recent enactment of the Environment Act 2021 by parliament and the imminent obligation for projects constructed from 2023 onwards, to deliver a new increase in biodiversity. A specialist consultant has used the latest DEFRA calculator to determine that the Proposed Development will deliver significantly more than the future legal minimum biodiversity net gain if the proposed Landscape and Ecology Management Plan (LEMP) is followed.

Proposed Development Benefits

The Proposed Development would provide clean, renewable, and sustainable electricity exclusively for the Borough of East Staffordshire. Local power generation will contribute to the overall energy supply in the area and can contribute to local business opportunities. The Proposed Development will bring in an annual income to the area which will contribute to the local economy and can generate job opportunities.

This proposal also represents a meaningful contribution to East Staffordshire Borough Council's progress in meeting its renewable energy target and assist in meeting national targets. The Proposed Development would also deliver significant biodiversity enhancements, in excess of the imminent legal minimum through additional planting around the site, and allowing the agricultural land to naturally regenerate during the proposed development's operational life.

<b>3. Possible Effects on the Environment - Applicable Thresholds</b>	
<b>Schedule 2</b>	
Does the Proposed Development fall in Schedule 1?	No
If yes, the development automatically requires EIA	
If no, does the Proposed Development fall within Schedule 2?	Yes
If yes, what is the applicable development description?	3 (a) - Industrial installation for the production of electricity, steam and hot water.
Is the project located in or adjacent to a 'Sensitive Area'?	No
What is the corresponding applicable threshold in schedule 2?	3 (a) The area of the development exceeds 0.5 hectares.

## 4. Possible Effects on the Environment

Considerations of the Proposed Development against the Environmental Impact Assessment (EIA), Schedule 3 Regulations are set out in the below section.

### 4.1 Characteristics of the Development

#### 4.1.1 Size and Design of the Development

The proposed site would be approximately 22.13ha in size. When operational, the proposed development would have a capacity of approximately 12MW. The site would be secured by a 2.2m high deer fence, with thermal cameras mounted to post approximately 4m high, located every 50m along the perimeter. The site will not be lit at night. The solar panels will be attached to galvanised steel or aluminium mounting frames, with a matt finish at an angle between 15-30 degrees.

#### 4.1.2 Cumulation with Other Developments

Rolleston Park Solar Farm was approved for planning in 2014 by East Staffordshire Borough Council under planning reference P/2014/00830 and is located adjacent west of the Proposed Development.

For the avoidance of doubt, the solar generators and infrastructure will not be linked, the Proposed Development is a separate solar farm in its own right.

#### 4.1.3 Use of Natural Resource:

The development utilises sunlight, a renewable resource, to generate power. The materials used in the manufacture of the equipment for the Proposed Development are an abundant resource that can be recycled at the end of the development's life. In this regard, the use of any natural resource would be sustainable.

#### 4.1.4 Production of Waste

The Proposed Development would not produce any waste during its operation. At the end of the development's life, the materials used can be recycled. The minimal amount of waste arising during the construction period largely relates to packaging materials, the majority of which can be recycled, and in any case would be sustainably managed.

#### 4.1.5 Pollution and Nuisances

Potential nuisance from the development would be mostly limited to some short-term noise, vibration, vehicle movements and dust, potentially created during the construction phase. The nature of solar farms means that no hazardous, toxic, or noxious substances would be released, nor would there be risk of contamination to air, water, or land. There would be no permanent lighting and no releases of heat, energy, or electromagnetic radiation to the environment. The proposal does not require significant earthworks and the site would be self-contained. As such there would be no significant impacts in terms of pollution or nuisances. In the operational phase, some minor fan noise / electrical hum could arise and only be audible from the immediate vicinity of the electrical equipment and is highly unlikely to be audible from outside the site.

#### 4.1.6 Risk of Accidents with Regards to Substances or Technologies

Solar generators contain no materials that are combustible or liable to explode.

#### 4.1.7 Risk to Human Health

Solar generators do not produce any pollutants that would present a risk to human health.

### **4.2 Location of the Development**

#### 4.2.1 Existing Land Use

The land is currently used for arable agriculture and permanent grassland. The development is for a temporary period and the construction method ensures that the land can return to full agricultural production at the end of this period.

#### 4.2.2 Relative Abundance, Abundance, Quality and Regenerative Capacity of Natural Resources.

The natural resource being used is sunlight, which for all intents and purposes is limitless. The location, layout and design would retain and enhance natural biodiversity and landscape features.

A desktop appraisal of Agricultural Land Classification (ALC) has demonstrated that the majority of the development is located on lower grade land (grade 3 - Good to Moderate), using the guidelines set out in the publication "Agricultural Land Classification of England and Wales" (MAFF, 1988).

Early feasibility work sought to identify the best location within the local area; choosing lower grade land was one criterion, alongside landscape, visual and ecological criteria as well as technical and commercial feasibility.

No Grade 1 and 2 land would be used;

- No agricultural land would be lost since the development is temporary, the adjacent agricultural land can continue to be used, and grazing of the development site by sheep may be supported by the ecology management plan;
- Solar generation equipment would be completely removed at the end of its life; and
- Biodiversity enhancements, including new hedges, would deliver significant ecological and long-term agricultural benefits, which replenishes the agricultural land. A Biodiversity Net Gain Assessment, using Natural England's calculator, is to be submitted with the full planning application.

Therefore, agricultural land is abundant and the quality and regenerative capacity of the natural resource is likely to improve as a result of the scheme.

#### 4.2.3 Absorption Capacity of the Natural Environment

Early feasibility work sought to identify the best locations within the area, taking into consideration landscape and visual constraints, and other site-specific factors. An accompanying baseline Landscape and Visual Impact Assessment would also be submitted with the full planning application. The scheme would be well screened from most public viewpoints, or capable of being screened by new planting or growth. The naturally lower gradient of the site relative to its surroundings further screens the Proposed Development from the adjacent north. The effect of this is to allow the scheme to be absorbed into the natural environment.

Therefore, the effect that the proposal may have upon the natural environment should not be considered significant, due to its limited landscape, visual, and negligible pollution and waste impacts as detailed above.

### **4.3 Characteristics of the Potential Impacts**

#### 4.3.1 Magnitude and Spatial Extent of the Impacts

The total area of the proposed site is approximately 22.13ha. Consequently, it is deemed that the magnitude of any impacts would be limited (see also “possibility of effectively reducing the impact” below):

- Ecology - An Ecological Impact Assessment is to be undertaken to assess the ecological footprint of the site and submitted alongside this application. However, we are able to gauge the ecology at the Proposed Development based off the existing solar array at Rolleston Park Farm (P/2014/00830) directly adjacent to the site. For instance, it was concluded in SRL Global Environmental Solutions in their Preliminary Ecology Appraisal (PEA) that Great Crested Newts (GCN) and reptiles were not recorded on the site, so is unlikely to be an issue on our Proposed Development, due to the close proximity of each of the sites. Two active badger setts were identified, but not subject to damage or disturbance from any construction activities. The PEA also included that a small number of breeding skylark, birds recorded during survey work deemed unlikely to be adversely affected by the proposals, as no hedgerow habitat will be removed. There were no other pertinent constraints flagged up in the PEA of the original approved Rolleston Park Farm application, so we deem the Proposed Development to show a similar ecological footprint from the close proximity of these two sites. As mentioned, we will submit our own Ecological Impact Assessment alongside any application submitted.
- There is a footpath located along the private driveway to Rolleston Park Farm between, named Tutbury 16 Footpath. Additional native hedgerow planting is proposed along this road to reduce visibility onto the site, however, this road will be used for construction access through the approximate 16 week construction period.
- The solar panels would be no more than 4m in height, meaning that visual impacts would be mostly localised in their extent and magnitude.
- No protected landscapes would be affected and any harm to surrounding landscape would be minimised due to the existing mature boundary and the planting of new hedgerows and trees.
- The closest listed building to the site is located 500m south east of the site, which will not pose any harm to the proposal, as this 'building' consists of a cast iron post and is not visible from the site. There is also Chapel House Farm House listed building 1.1km west of the site, due to the location and setting this is not envisioned to cause any harm.
- A Heritage Assessment is proposed to be submitted alongside the planning application, however, the Heritage Assessment submitted alongside the P/2014/00830 application concluded that the proposal was not affected by any listed buildings.
- The land to the south of the Proposed Development below the private road is designated as flood zone 3, the solar panels on this section are to be implanted at a higher height. The land at the Proposed Development above the private road is designated as flood zone 1, and will not need to be designed to adapt to flood risk. A Flood Risk Assessment will accompany the submission of the planning application.
- The increase of vehicle traffic arising during the construction phase of the proposed development, is deemed to have a negligible impact on the existing highways. Vehicular access to the site is proposed to be via a private drive off of the A511. A new access track will be constructed from crushed hardcore to allow access within the site. The access roads are capable of handling the light and heavy goods vehicles the project will require.



As and when necessary, vehicle wheels will be manually cleaned prior to release onto the public highway, to minimise the risk of debris being deposited on the highway, in order to reduce any potential impact to the highways. The site construction manager will monitor the public highway conditions and will assess if further measures are required to maintain road cleanliness, such as road sweeping.

In summary, the magnitude and spatial extent of the impact is limited and can be mitigated, and evidence of these mitigation measures have been submitted alongside the formal Planning Application. It is further considered that all heritage and archaeological risks will be described in the Planning Application and will be considered in the course of its assessment.

#### 4.3.2 Nature of the Impact

Solar generators are typically low impact developments and on the proposed site, these would be limited to some visual, landscape, and heritage impacts (see previous section). However, these impacts would be largely limited to within the site itself and immediate surrounding areas and could be suitably mitigated as part of this development.

The Proposed Development is low impact, with no emissions to air or water, meaning it is unlikely to have an adverse effect on the surrounding area. The proposal includes a significant biodiversity net gain through onsite ecological enhancements across the entire site. The proposed solar generator would help the land regenerate from the continued cultivation of the land, for the duration of the project which, along with an appropriate management plan, should bring significant benefits to flora and fauna, as well as to the soil and surrounding habitats.

As stated, the land on the Proposed Development above the private road lies within flood zone 1, and the land to the south of the private road lies within flood zone 3, which presents a high to medium risk of flooding from rivers or surface water. A detailed Flood Risk Assessment including high level surface water management plan would be undertaken and mitigation measures included. The solar generator would be specifically designed to not interfere with water flow in a flood event, and to be flood resistant by raising the height of any sensitive electrical equipment above the flood water levels determined in the flood risk assessment.

The proposed solar farm is considered to be 'Essential Infrastructure', under Table 2 of the Flood Risk and Coastal Change Planning Policy Guidance (PPG) and the principles of the National Planning Policy Framework (NPPF).

#### 4.3.3 Transboundary Nature of the Impact

No significant transboundary (national or international) impacts are envisaged.

#### 4.3.4 Intensity and Complexity of the Impact

In terms of complexity, the principal impacts have been defined above and are not considered to be complex in nature and are clearly understandable. Any impacts would be limited to a small area. Noise would be emitted by the substation and transformers during operational (i.e., daylight) hours, but this would be very low level and calculated to be inaudible outside site boundaries. The impact would therefore be negligible outside of the site itself.

#### 4.3.5 Probability of the Impact

Although the impacts identified above would arise from the development, it is considered that these would not be significant and can be appropriately mitigated.

#### 4.3.6 Expected Onset, Duration, Frequency and Reversibility of the Impact

Although the Proposed Development is proposed to have an operational life of 40 years, at the end of the operational period, site restoration would be relatively simple and all equipment removed, leaving no long-term impacts or pollution.

#### 4.3.7 Cumulation of the Impact with the Impact of the Other Existing and/or Approved Development

Due to the location of the area, it is considered that the Proposed Development, would not have an individual or cumulative impact with existing and/or approved development, and would not be of a size, design or nature that impacts existing development.

#### 4.3.8 Possibility of Effectively Reducing the Impact

A mitigations and enhancements plan would accompany the planning application. This would include:

- Enhancing existing natural screening, by infilling with native species where gaps are present and introducing additional hedges and trees where necessary to reduce landscape, visual and heritage impacts. This would also include allowing the existing hedges to grow and infilling the gaps within the hedges.
- Various ecological enhancements will be implemented to increase the biodiversity of the site. The creation of tussock field margins and a diverse grassland will increase both foraging and nesting opportunities for birds.
- A hibernaculum will be constructed to provide shelter for amphibians and invertebrates. Similarly, bird and bat boxes will be installed on mature trees within the woodland and existing trees in the hedgerow network.
- Grassland within the array will be seeded with a diverse native meadow seed mix.
- Gaps will also be allowed under the security fencing which will allow access for mammals. The site is likely to benefit species such as the Brown Hare, as the mixed grassland provides suitable habitat for this species.
- Other parts would be managed for conservation to allow wildflowers to flower and set seed.

## **5. Conclusion**

It is considered that the proposal falls within the category under Schedule 2 (3 a), as described in the EIA Regulations 2017. Development proposals described under Schedule 2 require an EIA if they are considered '*likely to have significant effects on the environment*' by virtue factors such as the nature of the development, size or location.

Given the nature of the proposed development, it is considered that whilst some effects upon the environment as a consequence of the proposed development are recognised, none of these are considered to constitute 'significant effects'. Furthermore, as the Proposed Development does not constitute an EIA development, the proposal would not require an Environmental Statement to be submitted alongside the planning application in this location.

We trust that the above information is sufficient to enable you to issue a screening opinion within the statutory three-week period allowed for this task. We look forward to receiving the East Staffordshire Borough Council's response to this Screening request.