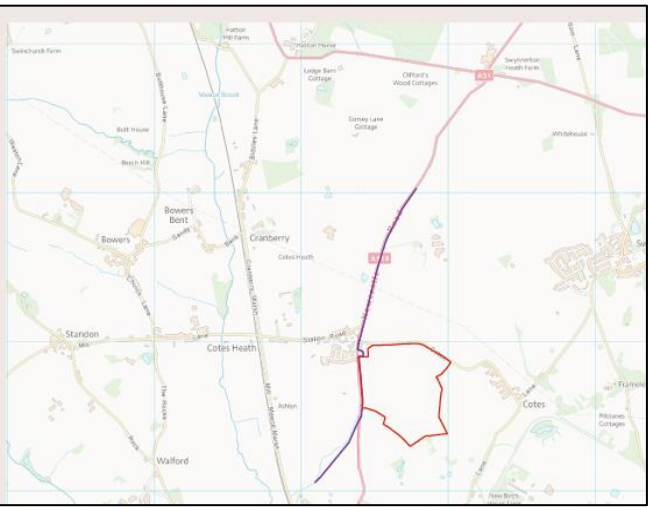
(Proposals) What the Developers Say

Welcome to our public consultation on Cotes Heath Solar.

Ampyr Solar Europe (ASE) is developing a proposal for a solar development to the southeast of the village of Cotes Heath in Staffordshire. The proposed solar development will cover approximately **24 hectares (ha)** within the overall **30 hectare site**.

We anticipate the solar development being able to generate up to **15 megawatts (MW)** of renewable energy that would be exported to the local grid, supplying the equivalent electricity needs of approximately **7,400 homes a year**.

The clean energy generated will save on average **5,100 tonnes of CO_2 per year**, which adds up to over **250,000 tonnes of CO_2 over the next 50 years**.



Objectors Response

Ampyr Solar Europe is the developer of the proposal. It may not be the operator. Once construction is complete, the site may be sold off to private investors. Ownership may change over the years and liability for the relevant planning conditions (such as remediation after 50 years) may be difficult to enforce. In the UK, specialists advise that a 15MW solar farm generally serves approximately 3,750 homes, not 7,400 claimed by Ampyr. Either way, these homes will be across the UK and not locally as the power generated is exported to the National Grid. There is no financial benefit to the locality or the residents of Cotes Heath.

The quantum of these speculative applications is possibly due to the fact that if approved, the operators will still receive financial subsidies to cover the 'notional' capability of power generation whilst standing dormant, ie a healthy return for investors for doing nothing.

(Justification) What the Developers Say

Why do we need the solar development?

CO_2

The UK is transitioning to zero and low carbon sources of power. All coal-fired power stations have now closed, meaning the amount of energy generated from renewable sources needs to increase. The UK's climate change ambitions are amongst the highest in Europe and the aim to achieve net-zero carbon emissions by 2050 is set in law, and on 23 July 2019 Stafford Borough Council declared a climate emergency.

By 2050 the UK is expected by National Grid to be using double the amount of electricity than we do today. For example, the growth in electric vehicle ownership has grown thirty-fold and is set to rise with the abolition of new diesel and petrol cars by 2035.

Currently the UK's electricity price is among the highest in Europe, meaning that we need to find ways of generating more affordable, renewable and clean electricity. Energy security for the country is also of paramount importance.

Objectors Response

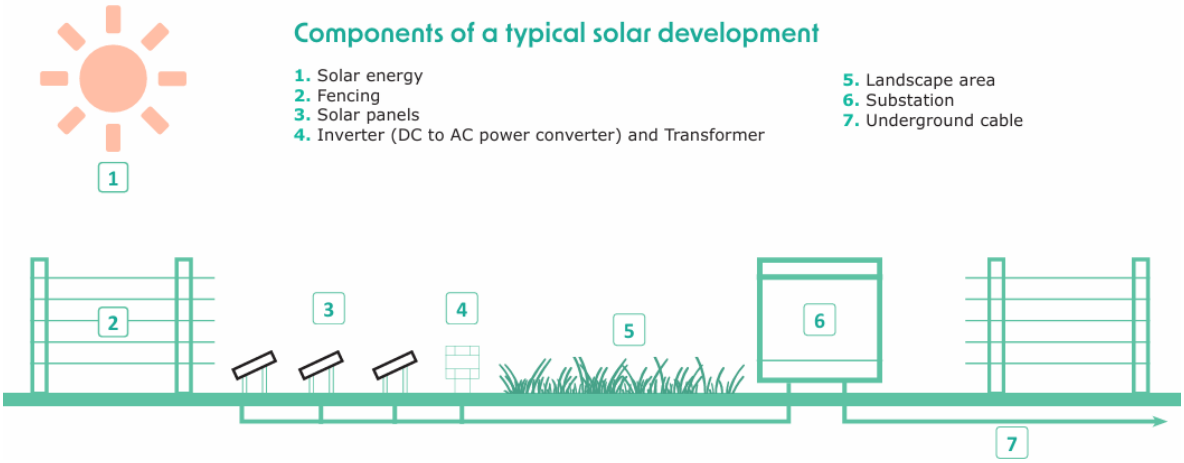
There is no point approving schemes that may not be required to support the Clean Energy Targets. The Clean Power Action Plan identifies that **45-47GW** is the target for all solar projects by 2030 although the current connections queue stands at over **738 GW**, grossly exceeding the clean generation capacity required by 2030.

EV's in the UK have increased since 2020 four-fold (not thirty-fold). They still only account for 4.6% of the total 34m cars in the UK. The solar industry is using scare tactics to support the growth in their industry.

Energy security is extremely important but so too is food production. Solar Farms provide energy capacity but not affordability as there will be no reduction in the cost of electricity to the consumer.

(How it Works) What the Developers Say

The diagram below illustrates the developers schematic sequence of electric power generation via photovoltaic cells.



Objectors Response

The Developer fails to incorporate the adverse flow of activities added below.

- PV cells manufactured in countries like China amounting to 80% of the capital cost.
- There are claims that forced labour is used to manufacture the panels in countries like China. As the production is not regulated, the use of forced labour cannot be discounted.
- Air miles and carbon footprint of transportation of the panels to the UK.
- CO2 emissions of embodied energy through production.

- Solar panels create cooling of the land which affects surrounding land and potentially impacts ecosystem processes.
- They also disrupt soil structure and organic matter through compaction and in fact reduce soil fertility and microbial activity over time.
- When the solar operations are terminated the land may never return for food as it will be re-classified as a brownfield site.

- PV panels are not recyclable and have a lifespan of circa 20-25 years which means that they will be replaced at least once during the 50 year operation
- 2,700 panels will consequently be transported to landfill sites in the UK.

(Environmental Considerations) What the Developers Say

Agriculture

We know that food security is important. The next big challenge to our food supply is expected to be caused by climate change, so addressing this by using solar energy will improve our food security.

The land proposed for the Cotes Heath Solar site has been assessed through an Agricultural Land Classification (ALC) grading. The land is Grade 2 and Grade 3b, which falls within the definition of Best and Most Versatile Agricultural Land, as set out in the National Planning Policy Framework. An explanation of why the temporary loss of this land to farming is justified will be submitted with the application.

We are working closely with the current landowner on our proposal. ASE will seek to enhance biodiversity through wildflower meadow grassland or tree or shrub planting and maintenance at the site. There is potential for sheep farming and grazing between and beneath the solar panels.

After 50 years, the solar development will be decommissioned, and the land returned to the land-owner ready for arable use. It is expected that the soil condition will be much improved following five decades of sensitive management.

Objectors Response

Food Security: How does solar energy improve our food crops? Taking one renewable energy resource (farmland) out of effective use in order to develop another (energy) is a short sighted approach and should be resisted.

Temporary Loss: Since when is 50 years temporary? The land is also Grade 2 not 3a.

Collaboration: They may be working with the landowner who is to receive financial gain as a result of development but they haven't worked with the community and have actively attempted to exclude us from engagement.

Landscape mitigation: They attempt to mitigate the visual impact by proposing tree and shrub planting which takes between 15 -20 years to reach semi-maturity. A 'pre-commencement condition' would be appropriate in this situation (ie before installation of the solar panels starts) to ensure that semi mature native screening is planted and effective prior to construction.

Sheep grazing: The Developer claim that the land under the panels can still be farmed (agrivoltaics) by various measures such as sheep grazing. This is untrue as the panels reduce sunlight and rainfall to the land below. Grass grown in semi shaded areas with insufficient sunlight reduces the level of photosynthesis required to grow palatable grass and surveillance of the sheep will be hindered.

De-commissioning: The Developer will most likely sell on their concern to an operational company which could easily be dissolved, exposing the liability of having to dispose of panels, cabling, etc. to the Local Authority to reinstate it. The result will be that the site becomes an abandoned industrial wasteland and the tax payer will have to fund remediation. A 'pre-commencement condition' would be appropriate in this situation to ensure that an insurance backed bond in the favour of the Parish Council is secured to cover the cost of decommissioning which may run into millions of pounds.

Soil Condition: Solar panels create cooling of the ground which affects surrounding land with potential impacts on ecosystem processes. They also disrupt soil structure and organic matter through compaction and in fact reduce soil fertility and microbial activity. When the solar operations are terminated the land may never return for food as it will be re-classified as a brownfield site.

(Environmental Considerations) What the Developers Say

Flooding

The site is located in Flood Zone 1, and the majority of the site is located in an area of very low risk of surface water flooding, with a small section at low risk of flooding. Drains and water courses near the development will not be impacted by the solar development. Maintaining the grass below the site itself wherever possible will ensure that the land will remain permeable, meaning surface water can pass through easily.

As part of our planning application, we will submit a Flood Risk Assessment and Drainage Strategy, which will demonstrate that the site will not be affected by flood risk, nor affect flood risk elsewhere. It will also demonstrate how any residual risk of flooding will be managed.

Objectors Response

Solar panels are impervious so rainwater cannot reach the land below them. They also contribute towards soil consolidation increasing the risk of rainwater ‘run off’ to the site perimeters during severe rainstorms and the associated risk to neighbouring properties and the highway.

(Environmental Considerations) What the Developers Say

Heritage

Direct impacts on the heritage of the area are unlikely and there are no Conservation Areas, statutorily Listed Buildings, or Scheduled Monuments within the site. The planning application will include a Heritage Assessment that assesses any potential impacts on the setting and character of heritage sites, and the potential for undiscovered archaeological remains.

Objectors Response

Given the extent of the proposed solar array this development is likely to be visible across a very large area and could negatively impact heritage assets near the site. These include the Church of St James (Listed Grade II) and the Mill Meece Pumping Station (Listed Grade II and II*). The area is currently enjoyed by walkers, cyclists, local residents and those travelling from further afield. The solar farm development would turn a pleasant and rural area into an industrialised zone protected by CCTV cameras and high fencing with warning signs which are far from welcoming.

(Environmental Considerations) What the Developers Say

Ecology and biodiversity

Conserving and enhancing the biodiversity around Cotes Heath Solar is important to us. We are undertaking surveys to understand if there are any protected wildlife and habitats at the site, as well as to identify any mitigation required to minimise impacts on them. So far, these surveys have concluded that the solar development will not have a significant impact on the local ecology, wildlife or habitats of the area. The site also does not contain any protected, ancient or veteran trees.

The site will have a combination of solar panels and areas of ecological mitigation to protect the ecology of the site and its ecological value to the wider area.

Objectors Response

Solar farms have the potential to have a transformative effect on the land which could have consequences for local wildlife. In addition, security fencing around the site could become a barrier to the movement of wild mammals and amphibians.

(Environmental Considerations) What the Developers Say

Traffic

During construction, there is likely to be more traffic due to materials being delivered to the site but, when the solar development is operational, additional traffic would be limited to maintenance vehicles less than once a week on average.

During the construction phase, access to the site will be directly from the A519 (N), before approaching the A519 / A51 priority controlled roundabout junction. The site will be accessed by either using an existing field access or via a newly created access. We will aim to avoid the loss of any existing hedgerow should a new access be required.

Site traffic will consist of HGVs, light goods vehicles and cars. Movements during the construction phase are expected to have a minimal impact on the safety or operation of the local highway network, and a traffic management plan will be submitted as part of our application, as part of the Construction Traffic Management Plan and Transport Statement.

Objectors Response

The A519 is already a busy, fast and dangerous road especially at peak rush hours. Road works, long delays and traffic chaos will seriously impact local people and commuters who travel on this route whilst Station Road, Cranberry and Mill Meece Marsh will become rat-runs.

(Community Benefits) What the Developers Say

Community benefits and next steps

Community benefits

We are looking at ways to help ensure the local community benefits from the development of the solar development. This could include:

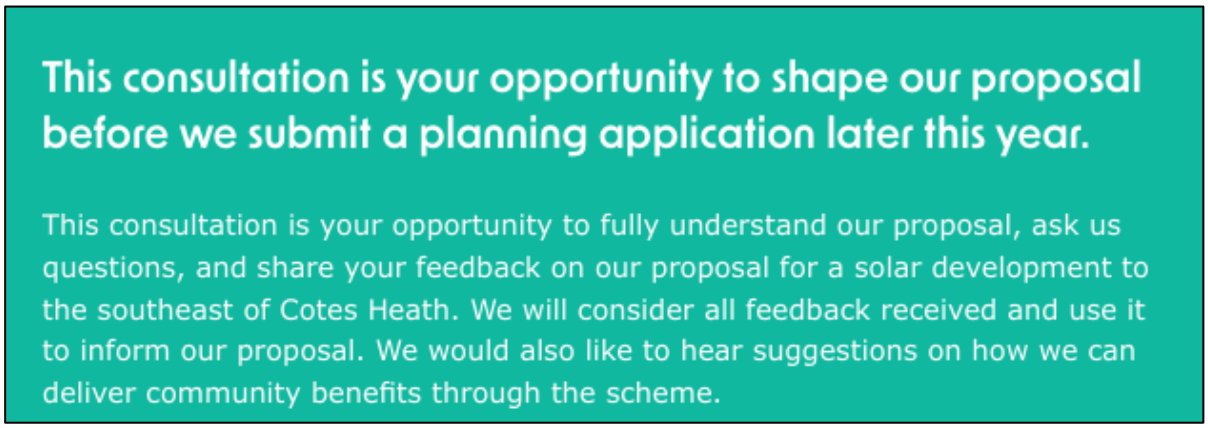
- A Community Benefit Fund to support local projects, initiatives, or community cooperative electricity
- Creating opportunities for local businesses in the supply chain

Objectors Response

The proposed development will not benefit the local community as the power generated by the solar panels will go straight to the national grid. Residents living adjacent to the site will suffer a significant adverse visual impact and there will also be a loss of the rural amenity and extensive open views.

A 'token' contribution towards a Community Fund is outrageously disproportionate to the permanent loss of our rural environment. We are custodians of our environment and need to protect the character for generations to follow as opposed to selling out for quick (ineffective) financial gain.

(Public Consultation) What the Developers Say



This consultation is your opportunity to shape our proposal before we submit a planning application later this year.

This consultation is your opportunity to fully understand our proposal, ask us questions, and share your feedback on our proposal for a solar development to the southeast of Cotes Heath. We will consider all feedback received and use it to inform our proposal. We would also like to hear suggestions on how we can deliver community benefits through the scheme.

Objectors Response

There was one public event on a weekday for approximately 7 hours despite the Parish Council requesting a longer period covering the weekend when working residents would be more likely to attend.

The Developer refused this request and spent the minimum time available to facilitate a 'box ticking' exercise.

They have also declined further requests to go back to the community after changing their proposals.

(How will it look?) What the Developers Say

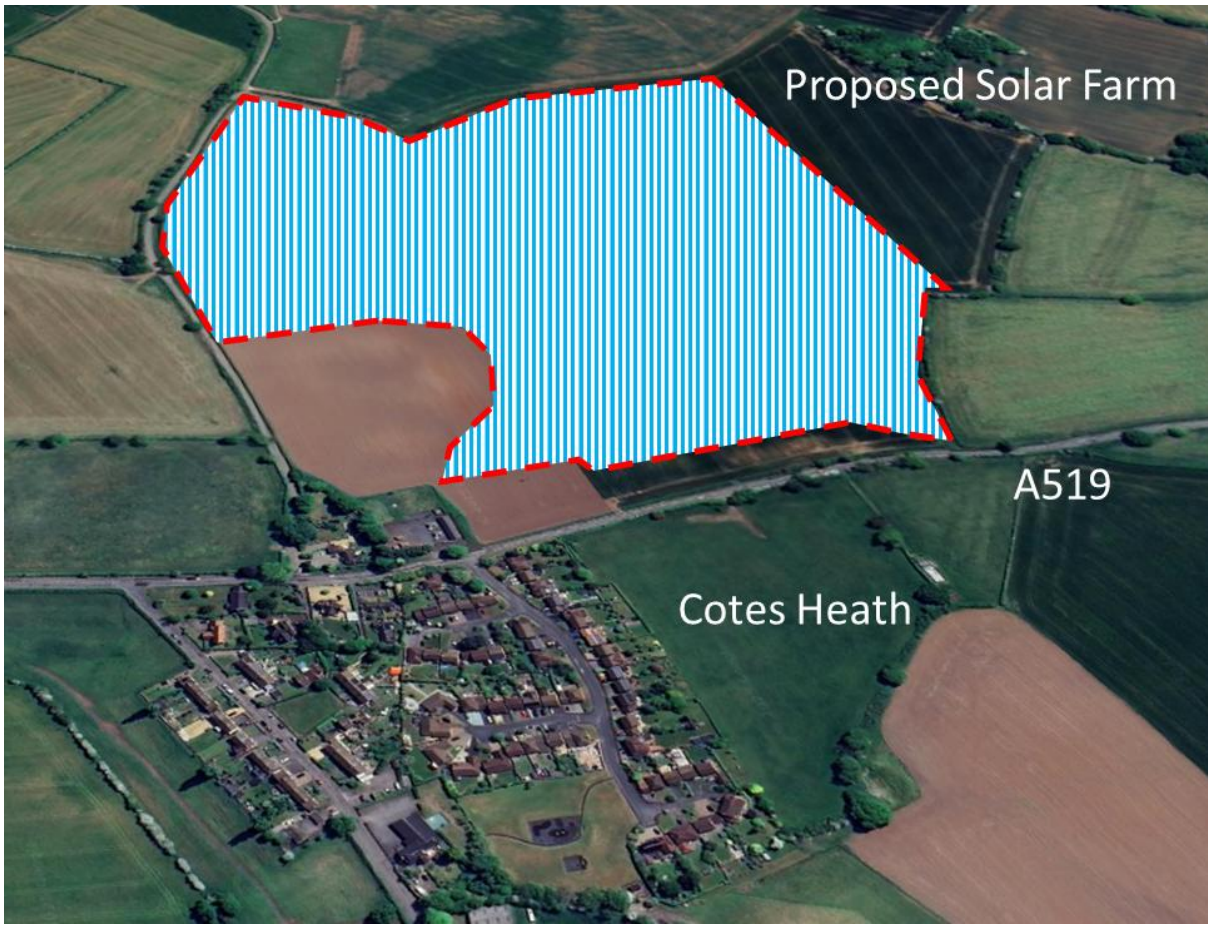
We have carefully considered how Cotes Heath Solar will fit into the landscape in order to reduce any visual effects on the community and impacts on local wildlife.

Height: The solar development will range from 0.6m in height at the base of the panel, to no more than 3m above the ground. This means that the visual effects of the solar development will be limited for the communities surrounding the site. We will be situating the panels in the lower elevation parts of the site, to minimise visibility as much as possible.

Glint and glare: Glint and glare are visual effects that can sometimes affect nearby motorists or homes. Solar panels are designed to maximise the absorbency of the sun's rays, and this means that glint and glare levels will be lower compared to surfaces such as window glass, water, or snow. We are also undertaking a Glint and Glare assessment that will cover a 500m buffer from the site boundary and consideration of aviation receptors further afield.

Screening: Existing hedgerows and trees will be maintained, with the boundary hedgerows reinforced where needed, which will also provide wildlife benefits. We will be developing a landscaping plan informed by a Landscape and Visual Assessment, which will be submitted with our planning application.

Objectors Response (Really !!)



20 Reasons for Objecting to these Proposals.

Our objections to the proposed solar farm development in Cotes Heath relate to contravention with Planning Policy and Guidance with respect to Protection of the Rural Environment and as a matter of principle to the unjustified destruction of our rural environment in the pursuit of renewable energy sources. 20 reasons why we are objecting are listed below.

Objection 1 (Stafford Local Plan, Suitability and Location): The current Local Plan identifies the preferred renewable energy solutions for the Borough relate to wind and biomass sources, not in favour of solar developments on agricultural land.

Objection 2 (Land Use / Sustainable Development): Development of the farmland at Cotes Heath may well make a minor contribution towards our renewable energy targets but it is in the wrong location and will come at the expense of losing valuable farmland.

Objection 3 (Location of the development): Solar farms should be appropriately located on brownfield sites not on productive agricultural land.

Objection 4 (Visual Impact): There are a number of residential properties located close to the site boundary and the development will have a significant adverse visual impact to these properties and is in contravention to NPPF and SBC Local Plan Policies.

Objection 5 (Negative impacts on landscape character): The solar farm would significantly adversely impact the character and appearance of the landscape.

Objection 6 (Impact on Agricultural Land): The proposed development includes land that is grade 2 which should be protected for agricultural use only.

Objection 7 (Traffic and Infrastructure): The proposed development will create significant transport impacts on the local road network during development

Objection 8 (Biodiversity and Ecology): Large solar farms have the potential to have a transformative effect on the land which could have consequences for local wildlife.

Objection 9 (Heritage concerns): This development will be visible across a very large area and could negatively impact heritage assets near the site.

Objection 10 (Noise): Solar farms are not quiet as the inverters emit an irritating low decibel humming noise.

Objection 11 (Tourism and local businesses): The area is currently enjoyed by walkers, cyclists, local residents and those travelling from further afield. The solar farm development would turn a pleasant and rural area into an industrialised zone.

Objection 12 (Size and Scale): The size and scale of the proposed development will have an adverse impact on the landscape character, natural beauty and tranquillity of what is currently a quiet rural area.

Objection 13 (Decommissioning): The Developer could easily be dissolved with the result that the site becomes an abandoned industrial wasteland and the tax payer will have to fund remediation.

Objection 14 (Remediation and Re-classification as a Brownfield Site): When the solar operations are terminated the land may never return for food as it will be re-classified as a brownfield site.

Objection 15 (Benefits to the local community): The proposed development will not benefit the local community as the power generated by the solar panels will go straight to the national grid.

Objection 16 (Economic Impact): Sacrificing farmland for solar farms is a short-sighted approach as the ongoing demand for sustainable food production, coupled with climate and international issues means agricultural land is more valuable than ever.

Objection 17 (Temporary Use): 50 years is not temporary and will span a generation.

Objection 18 (Consideration of Alternative Locations): The most suitable location for solar technologies is on industrial and other buildings with major roof surfaces, car parks and brownfield sites.

Objection 19 (Financial Gain at the expense of our Environment): The quantum of these speculative applications is possibly due to the fact that if approved, the operators will still receive financial subsidies to cover the ‘notional’ capability of power generation whilst standing dormant, ie a healthy return for investors for doing nothing.

Objection 20 (Cumulative Impact): There are two other planning applications currently being considered by the LPA (Knighton and Horsley) which are approximately 4.5 miles and 6.2 miles respectively from Cotes Heath. Each proposal is for generating just below 50MW of solar energy and will consume approximately 163Ha (402 acres) of agricultural land in the local area if they are approved. This proposal will add to an existing concentration of solar farm developments across Staffordshire whilst the cumulative landscape and infrastructure impacts are significant.