

**Proposed Solar Farm in Cotes Heath, Newcastle Road, Staffordshire.**  
**Ref: 25/40876/FUL**

**Summary of Reasons for Objection.**

- 1 Protection of Best and Most Versatile Land:** Planning policies state that the valuable grades 1, 2 & 3a should be protected from development not associated with agriculture or forestry. The applicant claims that the grading is affected by 'droughtiness' which is technically incorrect and misleading. They have also failed to demonstrate the necessity of development. It is beyond challenge that the application site is classified as grade 2 and 3a and without justification to the contrary should be protected for agricultural use.
- 2 Unsuitable Development:** The site selection does not comply with the Stafford Local Plan and fails to address the recommendations contained within Planning Policy documents, reports, guidance and ministerial statements which unequivocally state that brownfield areas of lower quality land and rooftops etc should be prioritised as locations for solar farm developments. The applicants' only response to this requirement is that the site is close to a grid connection. This decision is driven by financial viability which they assume will outweigh any planning and development considerations. Proximity to the grid connection is not a material consideration for granting planning approval and this application should be rejected accordingly.
- 3 Cumulative Impacts:** There are six operational solar farms within a 10 mile radius and a further 17 within a 20 mile radius of the application site. With regard to cumulative development, the applicant claims that there are currently three other planning applications for solar farm developments being considered by the LPA. The statement is incorrect as there are 8 planning applications in the pipeline within a 10 mile radius and a further 7 within 20 miles. Of particular importance are two sites (Knighton 22/36478/FUL and Horsley 23/37149/FUL) which are approximately 4.5 miles and 6.2 miles respectively from the application in Cotes Heath. The LPA should give due recognition of the quantum of speculative solar farm developments within the region and should dismiss the applicant's inference that the site should be reviewed in isolation without due regard to cumulative development within the geographical area. In addition, further applications in Staffordshire should be rejected given how rapidly achievement of the national target (described below) is being approached.
- 4 Energy Targets:** The government has a 47GW ground mounted solar target by 2035 although the Governments 'Clean Power 2030 Action Plan' confirms that current capacity for operational solar is circa 17GW with a connection queue for solar development in the pipeline in the region of 65GW, far exceeding the Governments' target of 47GW by 2023. This raises the question as to whether the loss of further best and most versatile land is acceptable in the pursuit of renewable energy farms that will not be required. Energy targets should not be used to justify development in inappropriate locations and at the expense of high quality agricultural land. Furthermore, protecting the global environment is not an excuse to destroy the rural environment. These proposals contradict NPPF Guidance and Local Plan Policies which are a material consideration for this application and should therefore be refused.
- 5 Non-compliance with Planning Policy and Guidance:** For the reasons explained in Sections 1:00 below, this application does not comply with applicable Planning Policies, Reports and Guidance listed below:

NPPF. Section 2. Achieving sustainable development. Para 8, Section 15. Conserving and enhancing the natural environment . Para 187. Section 11. Making effective use of land. Paras 124 and 125.

SBC Local Plan Spatial Principle 6 (SP6) – Achieving Rural Sustainability. Policy E2 Sustainable Rural Development. Policy N2 Climate Change. Plan Spatial Principle 7 (SP7) – Location of new development. Policy N8 Landscape Character. Policy N3 Low Carbon Sources and Renewable Energy.

Planning Practice Guidance for renewable and low carbon energy (Aug 2023), Reference ID: 4-024-20170728 and Reference ID: 5-013-20150327.

National Energy Policy Statements: NES EN-01 and NES EN-3.

**6 Design Considerations:** Regardless of this applications disregard for national and local planning policies, guidance and ministerial statements regarding development in unsuitable locations (BMV etc), the design statements are also flawed in respect of:

- a) **Key Benefits:** The applicants claim that the proposed solar farm could supply the electricity for 7,400 homes a year and save approximately 5,100 tonnes of CO2 per year appear exaggerated as data provided by the Solar Academy suggest a more realistic output would be to provide electricity for up to circa 3,750 homes and reduced CO2 emissions in the region of 3,250 tonnes/annum.
- b) **Viability:** Information obtained from the National Grid indicates a Headroom generation capacity of circa 9MW at the adjacent sub-station which raises questions over the viability and suitability of this site for a 15MW solar farm development with a consequential loss of circa 30HA of BMV agricultural land.
- c) **Layout:** The applicant has not recognised the constraints regarding the underground services on the site as the layout does not address the restrictions on development above or near to them.
- d) **Flooding:** The applicant fails to address the fact that the increased volume of storm water discharged from the site has to cross the A519 then downwards to the Mill Meece Pumping Station, across Mill Meece Marsh then under the Main West Coast Railway Line before reaching the Meece Brook. The A519 and Mill Meece Marsh currently experience regular flooding during heavy rainfall which will be exacerbated by this development.
- e) **Noise:** The applicant has not addressed the increased noise level experienced to the nearest neighbours when it will be most noticeable and unacceptable.

**7 Environmental Considerations:** The proposals will have a detrimental effect on the immediate environment (detailed in Sections 1:04 and 2:00 below) with respect to security, amenity, landscape character, visual impact, traffic and infrastructure, biodiversity, ecology, tourism and local businesses.

**This application offers no benefits to the local community, disregards many aspects of national and local planning policies, is unsuitable for it's location, has been inadequately designed, will lead to the unjustified loss of BMV land without justification, will contribute towards an unnecessary proliferation of speculative solar farms in the area, has not been subject to effective engagement with the community and is certainly not 'Temporary'.**

**For these reasons it should be refused.**