Bubney Solar Farm

ALTERNATIVE SITE ASSESSMENT

On Behalf Of Renewable Connections Developments Limited

March 2021 | P20-1083

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BUBNEY SOLAR FARM

ALTERNATIVE SITE SEARCH ASSESSMENT

ON BEHALF OF RENEWABLE CONNECTIONS

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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CONTENTS:

Page No:

1. INTRODUCTION

1.1 Renewable Connections Development Ltd are proposing a renewable energy scheme comprising ground mounted photovoltaics at Bubney Farm, Grindley Brook, Whitchurch, SY13 4QH.

1.2 This site search assessment report provides an up-to-date comparative analysis of potential sites that could accommodate the development proposal within a defined area of search[1]. There is no national or local planning application validation requirements to prepare this assessment and as such it is duly submitted on a without prejudice basis.

1.3 The purpose of the report is to provide a desk top evaluation of any potential alternative sites that could accommodate the development, with focus given to the availability of previously developed land, non-agricultural land or land of lower agricultural grade available within the defined area of search.

1.4 The purpose of the report is to ensure there are no alternative sites which could potentially provide a more locally acceptable, alternative location for this proposed development. The assessment takes into account relevant planning policy together with the operational and development needs guiding the temporary proposal (operational lifespan of up to 40 years).

[1] Defined by proximity to the point of connection to the electricity grid which has capacity to accommodate the development.

2. APPROACH TO METHODOLOGY

2.1 This section establishes the site search methodology.

2.2 Notwithstanding the fact that strategic projects of this nature involve a long-term procurement process, it is acknowledged that the site selection assessment should remain under close review to take account of new policy or any significant changes in circumstances including any change in the status of the development site or other alternative sites.

2.3 Accordingly, this alternative assessment provides an up-to-date comparative analysis of potential alternative sites[2] identified within the established area of search.

2.4 A phased approach has been developed; the key stages are: -

Stage 1: Developing appropriate site selection criteria reflecting National and Local planning policy and guidance together with operational and developer considerations guiding the locationary needs and requirements of the development proposal.

Stage 2: *Identify* the broad area of search based on the methodology established during stage 1 and identify potential sites for review.

2.5 ***Stage 3***: Identification of alternatives sites and if necessary measure these against a criteria in order to assess if the application site is the most appropriate location for the development. This stage is split into three parts: -

- Review and staged sieving of previously developed land (PDL) in order to identify potential sites that would be available and appropriate for the development proposal;

- Review and staged sieving of non-agricultural sites against criteria in order to identify potential sites that would be available and appropriate for the development proposal; and

[2] As at 19 March 2021

- Review and assessment of agricultural land. This involves a stage sieving process, starting with the initial identification and preliminary assessment of lower grade agricultural land located within the area of search. If sites are deemed appropriate for further consideration, then they will be assessed against a criteria based assessment in order to assess their appropriateness for the development proposal when assessed against the development site (which is provisionally identified as grade 2 agricultural land).

3. STAGE 1: ESTABLISHING THE SITE SEARCH CRITERIA

National Planning Policy Framework (NPPF)

3.2 There is no prescribed methodology on how to conduct an alternative site search where it is undertaken.

3.3 However, the National Policy Statement EN-1 identifies how grid connection is as an important consideration for applicants wishing to construct generation plant; and this consideration is an important element for any renewable energy project which is seeking to connect to the national electricity infrastructure.

3.4 There is no Government guidance on what is a reasonable search area and as such each application should be considered on its own facts taking into account of planning and operational constraints. Accordingly, a pragmatic approach should be undertaken on the availability of alternatives which reflects the requirements the NPPF as a whole; key sections are (not in order of importance): -

3.5 **Paragraph 8** sets out the three overarching objectives for achieving sustainable development, a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.6 **Paragraph 10** identifies how sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

3.7 **Paragraph 92** seeks that planning policy and decisions guard against any unnecessary loss of valued facilities and services;

3.8 **Paragraph 97** seeks that existing open space, including playing fields, should not be built on;

3.9 **Paragraph 98** seeks that Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users;

3.10 **Paragraph 117** seeks that strategic policies should make as much as possible use of previously developed land;

3.11 **Paragraph 118(b)** recognises that undeveloped land can perform may functions, such as for wildlife, recreation, flood risk mitigation, carbon storage

3.12 **Paragraph 118(c)** gives substantial weight of using brownfield land within settlement for homes

3.13 **Paragraph 120** states planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability

3.14 **Paragraph 124** identifies how good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities

3.15 **Paragraph 148** states how the planning system should support the transition to a low carbon future in a changing climate and support renewable and low carbon energy and associated infrastructure.

3.16 **Paragraph 151** sets out measures to help increase the use and supply of renewable and low carbon energy by a) provide a positive strategy for energy from these sources, that maximise the potential for sustainable development, while ensuring the adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts; b) consider identifying areas for renewable and low carbon sources, where this would help secure their development; and, c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems.

3.17 **Paragraph 154** states that when determining planning applications for renewable and low carbon development they should a) not require applicants to demonstrate the overall need for renewable or low carbon development; b) approve the application of its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

3.18 **Paragraph 155** seeks that inappropriate development in flood risk areas should be avoided. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

3.19 **Paragraph 170** states the planning system should contribute to and enhance the natural and local environment by a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

3.20 **Footnote 53** states ***"Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality"***.

3.21 **Paragraph 172(b)**: Requires consideration of ***"the cost of, and scope for, developing elsewhere outside the designated area [AONB], or meeting the need for it in some other way"***.

3.22 **Paragraph 204** deals with minerals and seeks, amongst other things, that development proposals should not be permitted in minerals safeguarding areas where they might constrain potential future extraction.

3.23 **Paragraph 193** deals with heritage asset and states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. ***Paragraph 194 goes on to state*** that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

3.24 **Paragraph 195** states Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use

3.25 **Paragraph 196** states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Shropshire Council Core Strategy and Site Allocations and Management of Development Plan

3.26 The Core Strategy was adopted by the Shropshire District Council in March 2011 and sets out the local planning policy framework to deliver sustainable growth within the region up to 2026. The Site Allocations and Management of Development Plan (hereafter referred to as 'SAMDev Plan') was adopted in 2015 and sets out proposals for the use of land and policies to guide future development in order to help to deliver the Vision and Objectives of the Core Strategy.

3.27 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990, applications for planning permission should be determined in accordance with the Development Plan unless other material conditions indicate otherwise. The vision for Shropshire, which is described in the SCS and detailed within the Core Strategy, is of "A flourishing Shropshire". In order to deliver this vision, the SCS sets out three priorities. Of particular relevance, Priority 2: ***"Responding to climate and enhancing our natural and built environment"*** states that the following actions will be realised.

- Shropshire will be recognised as a leader in responding to climate change;
- Working with communities to prepare for and adapt to the uses that climate change may bring and ensure the rich varied environment is valued, protect and enhanced;
- Natural resources, waste and water will be managed efficiently and we will adapt our needs to meet the changing demands of the climate

3.28 Strategic objective 9 states "***Promote a low carbon Shropshire, delivering development which mitigates, and adapts to, the effect of climate change, including flood risk by promoting more responsible transport and travel choices, mor efficient use of energy and resources, the generation of energy from renewable sources, and effective and sustainable waste management."***

3.29 The key policies pertinent to the development proposals are: -

- Policy CS 5 – Countryside and Greenbelt;

- Policy CS6 – Sustainable design and development principles;
- Policy CS8 – Facilities, Services and Infrastructure Provision;
- Policy CS17 – Environmental Networks;
- Policy CS18 – Sustainable Water Management;
- SAMDev Plan Policy MD2 – Sustainable Design
- SAMDev Plan Policy MD8 – Infrastructure Provision
- SAMDev Plan Policy MD12 – Natural Environment
- SAMDev Plan PolicyMD13 – Historic Environment

3.30 The policies are detailed in full in the Planning Statement and as such not repeated here.

3.31 The sustainability objectives of the Core Strategy are identified as : -

- Promote safer communities.
- Provide a sufficient quantity of good quality housing, which meets the needs of all sections of society.
- Promote a strong and sustainable economy throughout Shropshire.
- Encourage high quality inward investment, and support existing businesses to expand and diversify.
- Encourage a modal shift towards more sustainable forms of transport.
- Reduce the need of people and businesses to travel.
- Promote community participation in a diverse range of sporting, recreational and cultural activities.
- Create active and healthier communities for all and reduce inequalities in health services.
- Reduce Shropshire's contribution to climate change.

- Adapt to the impacts of climate change.
- Protect, enhance and manage Shropshire's landscapes and townscapes.
- Preserve and enhance features and areas of archaeological, historical and cultural heritage importance.
- Protect and enhance the range and populations of species, the quality and extent of wildlife habitats and Shropshire's geological heritage.
- Protect and enhance Shropshire's water resources.
- Improve local air quality.
- Reduce the risk of flooding to people, property and wildlife.
- Protect and improve soil quality and soil retention.
- Ensure the efficient use of land and material resources.

Methodology Outcome

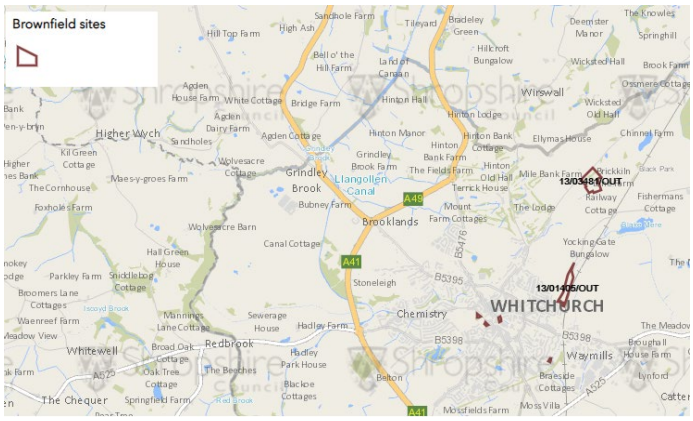
3.32 Reflecting the above, the site selection process is guided by development control considerations laid out through the relevant national and local planning policy guidance together with the operational needs and requirements of the development proposals, these are pulled together and summarised within Table below.

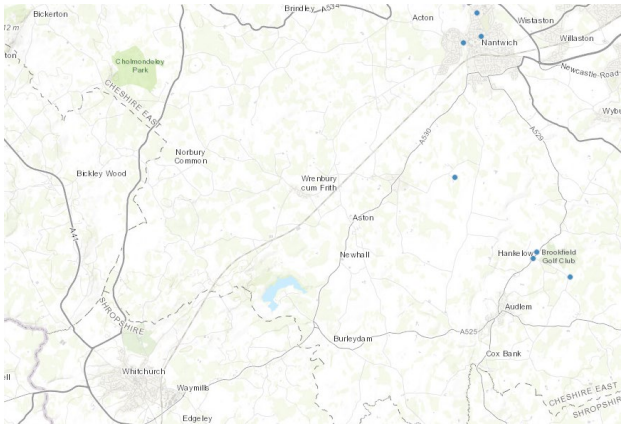
Table: Planning, Operational and Developer considerations guiding locationary requirements of development proposal.

No.	Issue	Amplification
1	Suitable location which benefits from sunlight intensity levels	Sites should be flat or a south facing slope and free from structures and trees that could cause shading.

2	A site with suitable grid connectivity	Viable grid connection is an essential material consideration and is instrumental in defining the 'area of search' for alternative sites. The grid connection costs vary dependant on scheme size; grid capacity and local grid infrastructure. Typically; large scale ground mounted solar schemes must be located within circa 5km in order for the scheme to be financially viable. **The area of search is therefore set at 5km from the point of grid connection.** The applicant has secured a viable grid connection offer at the Whitchurch Substation, located 900m to the north east of the site on the opposite side of the A41. The 5km range applies when there are no physical impediment which prevents a direct (or near direct) cable route running from the development site to point of grid connection. For example a site within 1km of the point of grid connection may prove to be unviable if there are physical or legal obstacles to negotiate (such as directing a cable run through a residential estate; under a river; under a railway or major road or lack of easements over land etc.
3	A site of a suitable shape, orientation and size that can accommodate the development proposal	Circa 60 hectares is required to deliver a 30MW scheme. This size requirement only applies when the site is characteristically clear of obstructions (or can be made clear of obstructions) and benefits from a level or gentle sloping topography. Importantly: - i. Where potential sites are subject of physical obstructions which cannot be removed (such as public footpaths, historical field boundaries,

		woodland, rivers, streams, highways etc.) the site area requirement is increased, where there is more than one constraint the development footprint can be significantly increased. Additionally, a site positioned within the rolling countryside, which is characteristic of the wider locality, would require a greater development footprint. A combination of both the physical and topographical constraints would further increase the area requirements; ii. The fragmentation of the development site would have an adverse effect towards a scheme's viability and deliverability. Furthermore, it would significantly increase the size of the development footprint. Accordingly, the focus is on delivering a single scheme as opposed to several smaller schemes which collectively total c. 30MW. Two or three separate sites cumulatively delivering 30MW at this location would by unviable since each scheme would generate additional infrastructure and create unviable costs associated with grid connection and easements over land etc.
4	Topography	The preference is for a site with a southerly aspect; however; northerly aspect sites cannot be dismissed. The outcome of selecting a site with a northerly aspect would be a need to increase the overall development footprint of the scheme (operational need to increase the distance between the arrays in order to avoid overshadowing of modules).
5	Previously developed land	The Planning Practice Guidance on Renewable and low carbon energy encourages the effective use of land by sequentially focussing large scale solar farms on previously developed and non-agricultural land,

	and non-agricultural land	then agricultural land (lower quality then higher quality). Re-using previously developed land / non-agricultural land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used. Based on this definition, this criterion involved consideration of whether a site could properly be categorised as previously developed land and/ or non-agricultural land. The LPA's brownfield land register shown limited availability of brownfield land surrounding Whitchurch, as shown in the figure below.  As the search area straddles four local authority boundaries, consideration must also be given to the brownfield land registers for Wrexham, Cheshire West & Chester and Cheshire East. Turning to Cheshire East, again, their brownfield land register does not show any previously developed sites located within the search area: -

		 Turning to Cheshire West, their tabulated brownfield land reregister do not list any previously development land within the search area. For Wrexham, they are at an advanced stage of their emerging development plan whereby examination is ongoing. The examination library for the emerging development plan does not identify any previously developed land within the area of search. At a strategic level, there are no previously development land registered with any local authorities which could be considered for the development proposal.
6	Agricultural land classification	Ground mounted solar parks are temporary structures and as such they do not lead to the sterilisation of agricultural land. Accordingly, unlike residential development or other renewable energy proposal (such as energy from waste plants) they do not constitute significant, permanent development resulting in the loss of agricultural land. For ground mounted solar parks the PPG on Renewable Energy sets out a site identification system whereby preference is given to the use of

		poorer agricultural land quality (grades 3b and 4) before higher land quality agricultural land (grades 1, 2 and 3a). Sites entirely within Best and Most Versatile Land (BMV) should only come forward and be considered when there are no other sites available which either entirely or proportionately comprise 'poorer land quality'.
7	Sensitive areas as defined by the EIA regulation	The EIA regulations define sensitive areas as including land notified under section 28(1) (Sites of Special Scientific Interest) of the Wildlife and Countryside Act 1981(21); a National Park within the meaning of the National Parks and Access to the Countryside Act 1949; the Broads; a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage; a Scheduled Monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979; an **Area of Outstanding Natural Beauty** designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(26); a European site within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010(27). The NPPF and Development Plan seek to steer development away from the sensitive environmental sites.
8	A suitable location which is served by appropriate	Appropriate highway infrastructure is a material consideration due to the (HGV) Heavy Goods Vehicles traffic trips generated during the construction period.

	highway infrastructure	
9	A suitable site which is available for the duration of the development proposal	The site must be available for the duration of energy generation requirement of 40 years and preference is for a site within single ownership. This will give confidence to applicant, local community, developer and local planning authority that the scheme can be delivered, maintained and decommissioned.
10	Site specific allocation	Consideration should be given to the planning vision for the site as presented within the extant and emerging development plan. For example; use of land safeguarded for amenity use or allocated for housing would be inappropriate and generate a policy conflict within the extant and emerging development plan. Furthermore, economic justification would be required for the change of use of land allocated for employment / industrial uses.
11	Flood risk	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere (extract from NPPF para 100). Solar panels are categorised as water compatible. However, the ancillary components (such as Inverters and Substations) are not water compatible. Accordingly, whilst it is acceptable for part of the site to be located within a higher flood risk zone; locating entire sites within such zones should be avoided.
12	Sensitive human receptors	This criterion requires an assessment of how the proposed development would relate to potentially sensitive human receptors on the site and in relation

		to neighbouring land uses including proximity to populated areas and or local villages.
13	Landscape and visual considerations	The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. Government guidance promotes good screening of sites.
14	Heritage considerations	Proposals should demonstrate that no substantial harm is caused to heritage assets; where there is an impact on heritage assets relevant mitigation measures should be considered to lessen impact.

3.33 Accordingly, the purpose of the alternative site search is to:-

- Firstly, identify any previously developed land available to accommodate the proposal within the defined search area. If more than one PDL site is identified then the criteria applied above will be used as a sieve to identify the most suitable brownfield land to accommodate the development proposal.

- Secondly, where no suitable brownfield sites are identified, the assessment will continue to review non-agricultural sites located within the defined search area. If more than one non-agricultural sites are identified then subject to their availability, the criterion set out above will be used to sieve out the most suitable non-agricultural land.

- Thirdly, where no suitable non-agricultural sites are identified, the assessment can move forward to consider agricultural land. If more than one agricultural site is identified then the criteria set out above will be used to sieve out the most suitable site occupying agricultural land.

Scoring Matrix

3.34 If multiple sites are found within each assessment stage then a numerical scoring system will be applied to enable a comparison of the identified sites.

3.35 The numeric system of scoring which will be applied to the assessment criteria is presented below.

3.36 **Table: Scoring Matrix**

Negative context (low score)	**Scoring**					**Positive context (high score)**
Unviable grid connection	1	2	3	4	5	Viable grid connection
Size not adequate	1	2	3	4	5	Size adequate
Unsuitable topography	1	2	3	4	5	Suitable topography
Greenfield site	1	2	3	4	5	Previously developed land / Non-agricultural land
Best and most versatile agricultural land (BMV)	1	2	3	4	5	Not BMV (poorer quality land)
In sensitive area as defined by EIA Regs	1	2	3	4	5	Not in sensitive area as defined by EIA Regs (for example a site within the

						AONB would be given a 1 rating)
Poor highway infrastructure	1	2	3	4	5	Good highway infrastructure
Land not available	1	2	3	4	5	Land available
No relevant site specific allocation	1	2	3	4	5	Site specific allocation for development proposal
Land within flood zone 3 (high risk of flooding)	1	2	3	4	5	Land within Flood Zone 1
Sensitive human receptors	1	2	3	4	5	No sensitive human receptors surrounding the site
Development not screened by landscape	1	2	3	4	5	Development site screened by landscape
In proximity to heritage assets	1	2	3	4	5	Not in proximity to heritage assets

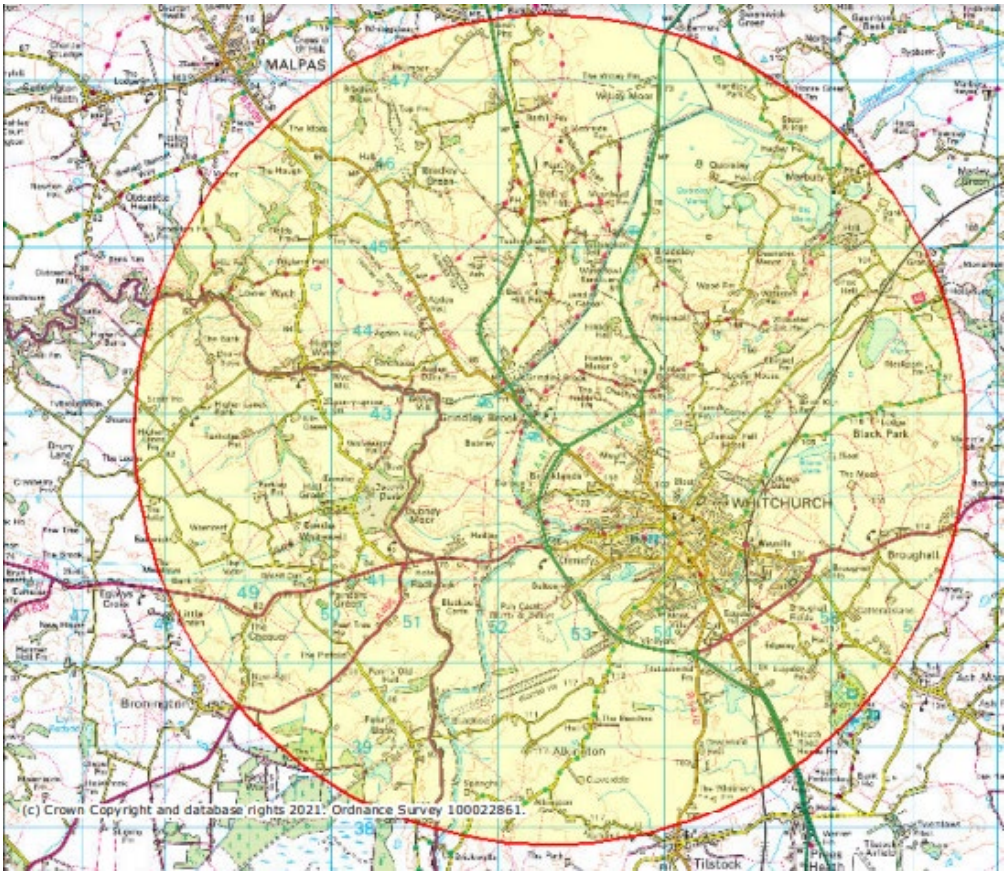
4. STAGE 2: DEFINING THE AREA OF SEARCH

Defining the Search Area

4.2 One of the biggest constraints which has to be considered when developing a ground mounted solar scheme is gaining access to the local electricity grid. As stated elsewhere in this report, a site should be reasonably located to its point of connection to the electricity grid and this should be up to 5km. Accordingly, all ground mounted solar searches start with grid proximity and capacity availability with the incumbent, as this determines where a solar park can connect to the National Distribution Grid. This was achieved by first working with the Distribution Network Operator (DNO) to establish where it is possible to connect to the local grid network followed up with a grid application to secure connectivity. The applicant has secured a viable grid connection offer at the Whitchurch Substation, located 900m to the north east of the site on the opposite side of the A41.

4.3 The defined search area is therefore set at 5km radius from the point of connection.

4.4 Illustration: Area of Search: -


MALPAS
WHITCHURCH
Broughall
Bronington
Tilstock
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5. STAGE 3A: REVIEW OF PREVIOUSLY DEVELOPED LAND

5.1 As suggested by the PPG, the applicant has considered the availability of previously developed land and non-agricultural sites within the search area.

5.2 The NPPF defines previously developed land as "***Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape***"[3].

5.3 As stated elsewhere in this report, at a strategic level, there is a shortage of registered previously developed land brownfield land within the area of search. A desktop search has also been undertaken to identify any additional brownfield sites over 10 hectares. The search was carried out using internet resources (namely the 'Property Link', the UK's commercial property listing site managed by the Estates Gazette). No other brownfield sites were identified within the defined search area.

Outcome

5.4 From the above, it is clear that there are no brownfield sites available to accommodate the proposal within the area of search, as defined by a 5km radius from Bubney Farm.

5.5 **For the purpose of this alternative site search assessment it is therefore demonstrated that non-agricultural land or agricultural land is required to accommodate the application proposal.**

5.6 The following section considers the availability of non-agricultural land.

[3] Source NPPF Glossary

6. STAGE 3B: REVIEW OF NON-AGRICULTURAL LAND

6.1 Due to the lack of available brownfield sites to accommodate the development proposal within the defined area of search, it has been demonstrated that either non-agricultural land or agricultural land is required to accommodate the development proposal. Consideration is firstly given to non-agricultural land.

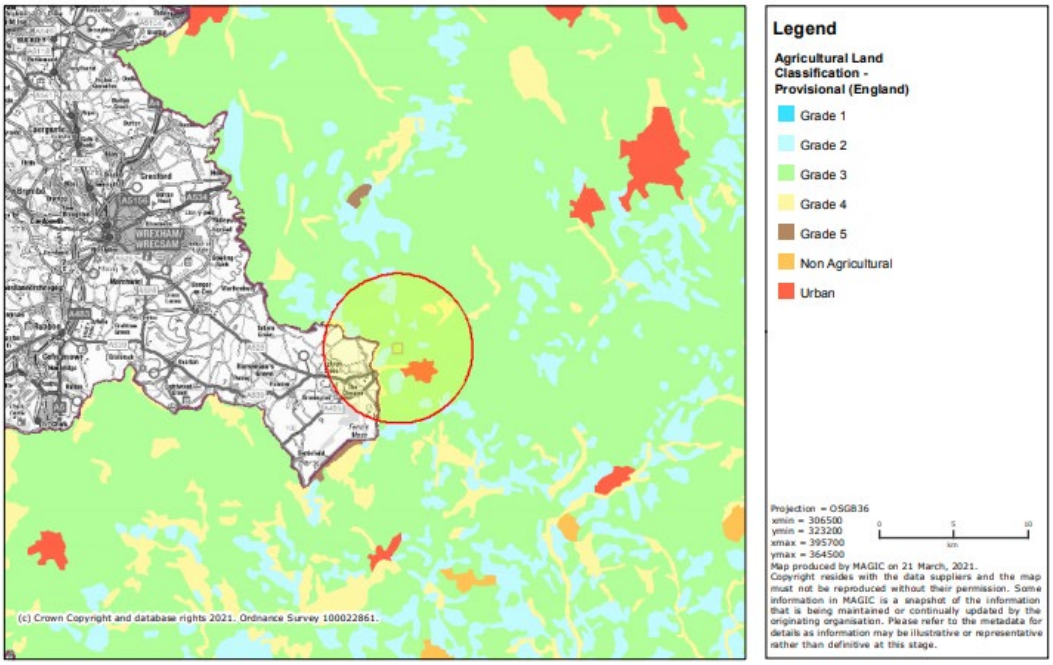
6.2 The Framework does not provide a definition of the term 'Non-agricultural land'. A definition of non-agriculture is provided through '*The Agricultural Land Classification of England and Wales Revised guidelines and criteria for grading the quality of agricultural land'* (published 1988). It defines non-agriculture as:- ***'Soft' uses where most of the land could be returned relatively easily to agriculture, including: golf courses, private parkland, public open spaces, sports fields, allotments and soft-surfaced areas on airports/ airfields"***.

6.3 From a local planning policy perspective; the extant Development Plan for all four local planning authorities which straddle the area of search seek to safeguard and protect green infrastructure (such as areas of parks, gardens, amenity greenspace and allotments); consequently by applying planning policy to development management; all four Local Planning Authority would seek to resist a change of use from such non-agricultural land to other land uses i.e. for renewable energy. That said, as part of the alternative site review; it is important to fully consider the development potential of non-agricultural land for ground mounted solar schemes (in accordance with National planning guidance).

6.4 For the purpose of this alternatives report all woodlands (and Copse) and plantations have been excluded from consideration. These sites have been excluded due to the physical restrictions imposed on such non-agricultural sites to accommodate ground mounted solar schemes[4].

6.5 Natural England's provisional agricultural land classification map also identifies areas of non-agricultural land. The illustration below shows that there are no 'non-agricultural land' located within the area of search.

[4] To make such a site acceptable would require significant felling of trees.



Outcome

6.6 From the above, it is clear that there are no non-agricultural sites available to accommodate the proposal within the area of search, as defined by a 5km radius from the substation located 900m to the north east of Bubney Farm.

6.7 **For the purpose of this alternative site search assessment it is therefore demonstrated that agricultural land is required to accommodate the application proposal.**

6.8 The following section considers the availability of agricultural land.

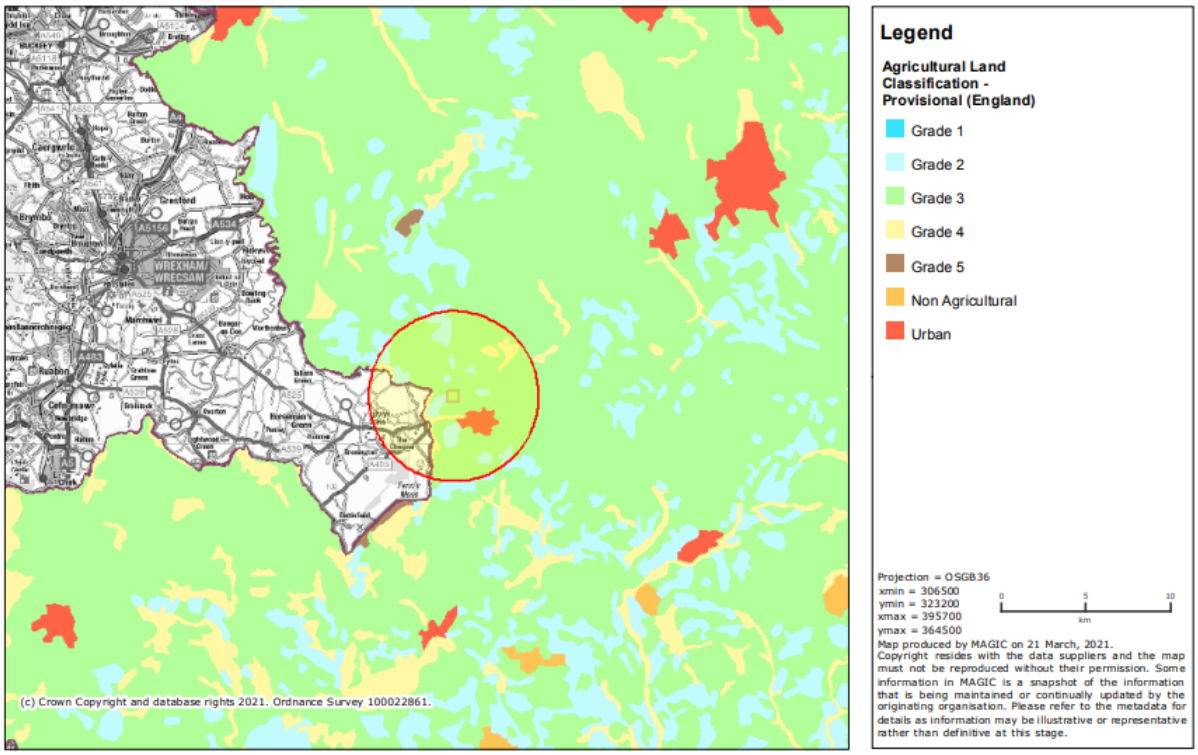
7. STAGE 3C: REVIEW OF AGRICULTURAL LAND

7.1 National guidance states that local planning authorities could give consideration to whether there are any areas of non-agricultural land that could be used in preference to higher quality land; when such land has been discounted consideration can then be given towards the use of agricultural land of poorer land quality in preference to higher quality land.

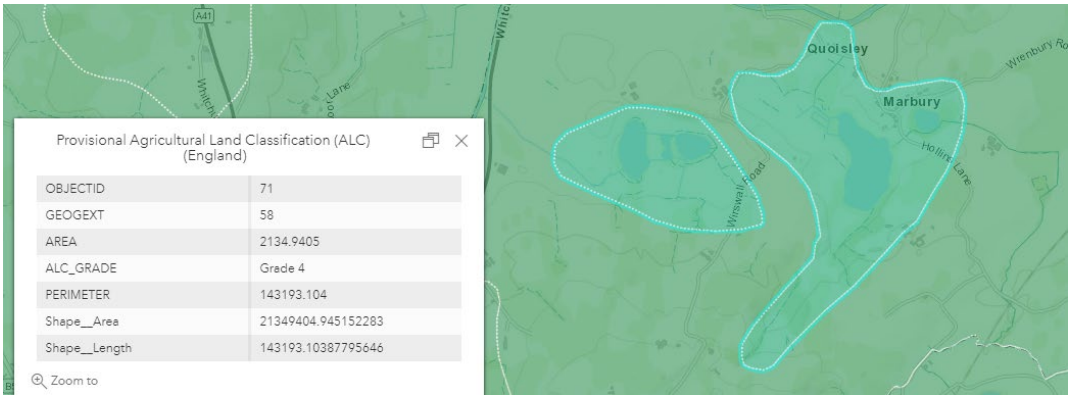
7.2 The strategic provisional land grading for the site is grade 2 agricultural land and as such there is a need to consider the availability of lower grade agricultural land.

Provisional land grading

7.3 At a strategic level, the majority of the agricultural land within 5km radius comprise either grade 2 land or undifferentiated grade 3 land. The provisional map is provided below and this is annotated with th5 5km search area: -

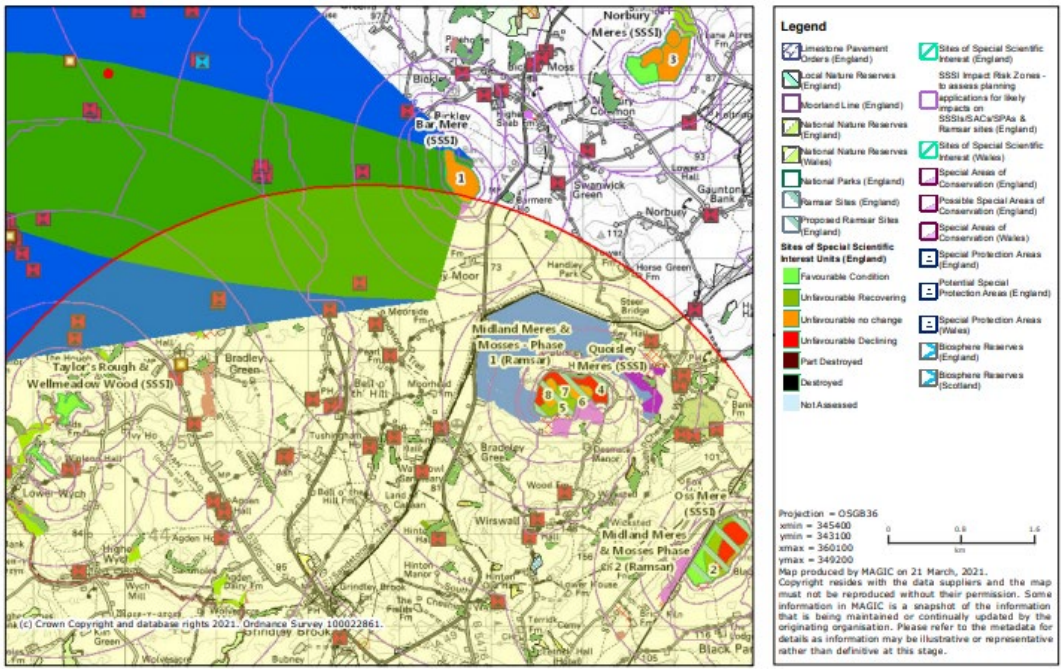


7.4 The provisional map identifies two areas of grade 4 agricultural land located within the area of search, namely Quoisly Mere and an adjoining wider area focused on Big Mere at Marbury: -



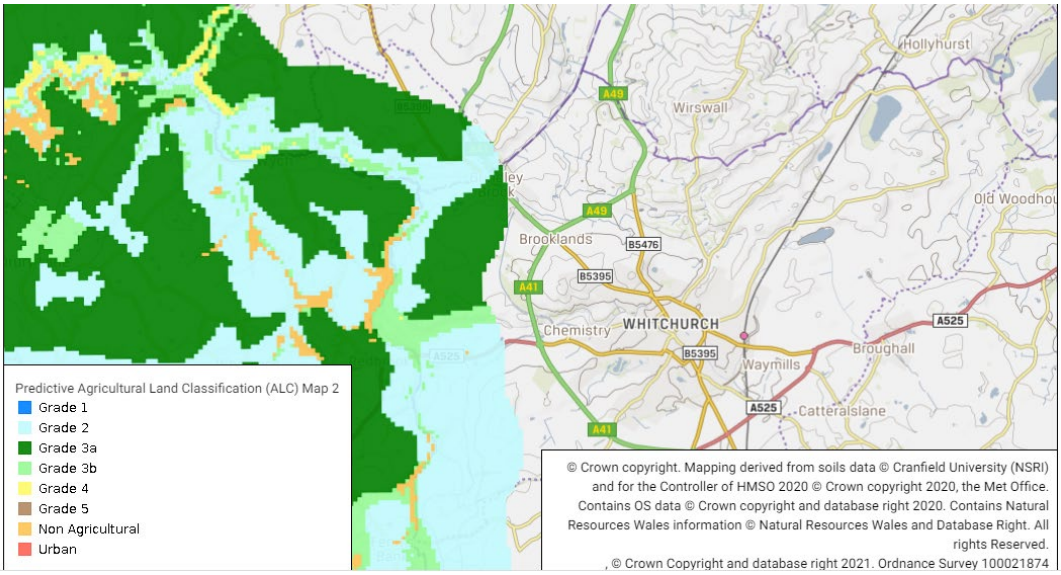
7.5 As shown in the illustration below, Quoisley Mere is an SSSI and therefore is not available for the development. Marbury Big Mere is a large private fishing lake and not appropriate for ground mounted solar. It is understood that all the meres are important sites for wildfowl, gadwall, garganey and ruddy ducks are among the species observed at Quoisley, with great crested newts, red-necked and Slavonian grebes, great and little bittern, Canada and pink-footed geese, coots, moorhens and mute swans recorded here[5]. The majority of the land to the west of Big Mere is identified as Priority Habitat for Purple Moor Grass and Rush Pasture. The grade 4 land also washes over the settlements of Marbury and Quoisley. Overall, there are physical and ecological constraints which restrict the appropriateness of these grade 4 sites for a large scale solar park as proposed by this development. Accordingly, they can be dismissed from further consideration.

[5] Source: http://www.cheshirenow.co.uk/marbury.html



7.6 All other large scale agricultural land within the search area, under English jurisdiction, is shown as either grade 2 land or undifferentiated grade 3 land and as such may comprise BMV land. At a strategic level, there is no clear availability of lower grade land located within this part of the search area. As such there is no need to consider alternative sites as there are no clear identification of lower grade agricultural land located within Shropshire, Cheshire West nor Cheshire East.

7.7 Turning to Wrexham administrative area, the Welsh Government's predictive agricultural land classification map shows that the majority of agricultural land located within the search area under the Welsh jurisdiction is either grade 2 or grade 3a: -



7.8 As such there is no need to further consider alternative sites as there are no clear identification of large scale lower grade agricultural land located within Wrexham's administrative boundary.

7.9 To summarise, a review of the strategic English and Welsh agricultural land classification maps have not identified any clear and appropriate lower grade agricultural land that would be sequentially preferred to the application site. As the strategic assessment has identified that there is no clear availability of lower grade agricultural land within the search area to accommodate the development, there is no need to consider this issue any further.

8. CONCLUSION

8.1 The specific land-take and land characteristics guiding this large scale ground mounted solar park makes the application site the sequentially preferred site within the defined area of search. The alternatives site search report has established: -

- There are no unallocated brownfield sites of adequate size that can accommodate the proposal.
- There are no 'non-agricultural' sites available to accommodate the application proposal.
- The provisional agricultural land classification map only shows two areas of lower grade land (grade 4) within the area of search that would be of appropriate size to accommodate the development, but these can be dismissed due to their environmental and ecological status.

8.2 Overall, no reasonable alternative sites of appropriate size have been identified which could accommodate the development proposal within 5km of the point of connection. Accordingly, there is no alternative which would be capable of delivering similar benefits.

8.3 The Applicant duly considered that the location of Bubney Farm, with spare grid connection capacity, would be efficient and economic, and it would allow connection without significant delay.

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