

EIA Screening Opinion Request

Site Name	Frocester Solar Farm
Site Address	Land to the north of Lower Downton Farm, Peter's St, Frocester, Stonehouse GL10 3TJ
Applicant	Novus Renewables
Agent	Dalcour Maclaren
Date of Issue	September 2022

1.1 Introduction

- 1.1.1 Dalcour Maclaren (DM) has been instructed by Novus Renewable Services Limited to seek an EIA Screening Opinion Request (SOR) from Stroud District Council (SDC) for a proposed solar farm on land near Frocester.
- 1.1.2 The information provided in this request satisfies the requirements outlined in Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, hereafter referred to as the 'EIA Regs'.
- 1.1.3 This request is made prior to stakeholder and public engagement, and a full planning application. Following SDC's response further technical assessments and engagement as necessary will be undertaken to support a full planning application.
- 1.1.4 This request is supported by a Site Location Plan and Indicative Site Layout.

1.2 Site Location and Characteristics

- 1.2.1 The land on which the solar farm is proposed (hereafter referred to as 'the Site') comprises an area measuring approximately 102ha. The Site is located approximately 1.5km north-west of Frocester in Gloucestershire (approximate postcode: GL10 3TJ; National Grid Reference: SO 76934 04142).
- 1.2.2 The Site is bounded by:
- The M5 to the west with fields beyond;
 - Agricultural fields to the south and east; and
 - Wickster's Brook to the north with fields and Eastington beyond.

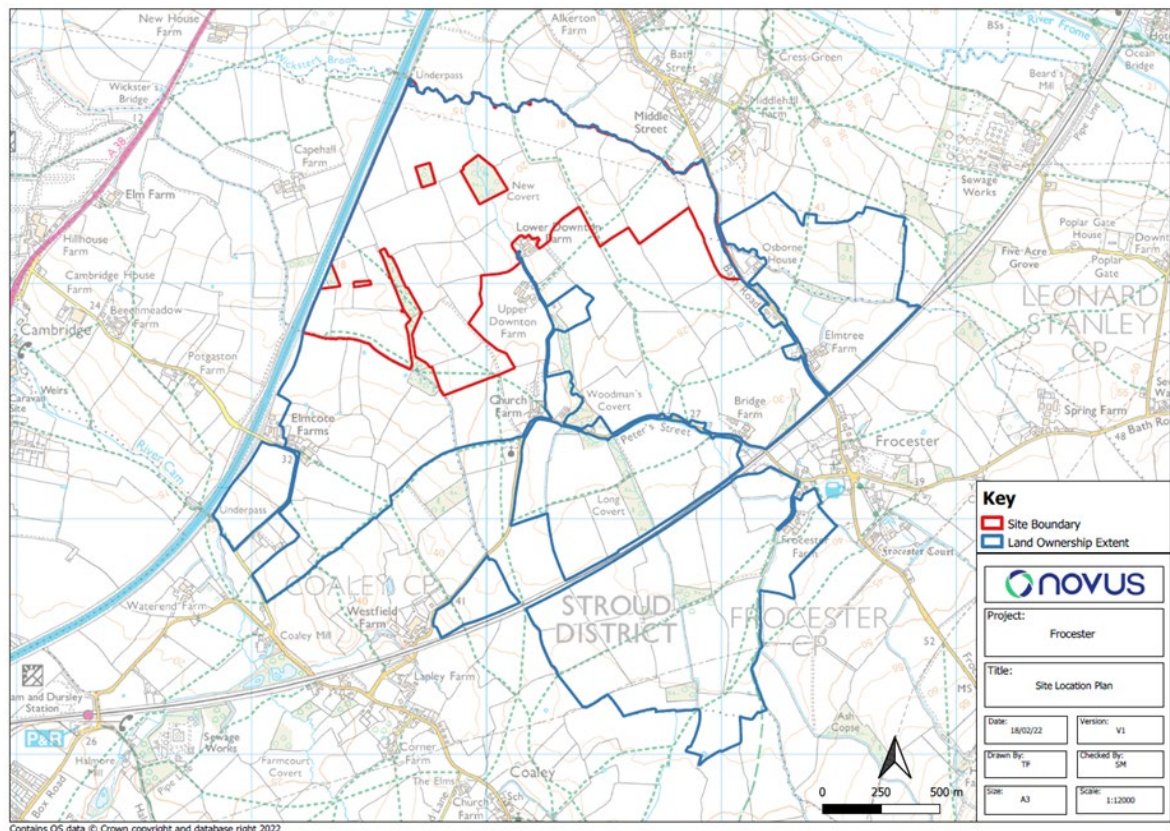


Figure 1: Site Location Plan showing proposed red line boundary.

- 1.2.3 The Site currently consists of agricultural fields with hedgerow boundaries used for grazing and arable crops. The land is shown to be Grade 3 'Good to Moderate' on Natural England's Regional Agricultural Land Classification Maps. There are pockets of woodland and scattered trees around the Site area. Wickster's Brook runs along the northern boundary of the Site. A tributary of Wickster's Brook runs through the Site flowing from south east to north west.
- 1.2.4 An overhead line runs across the Site from east to west, south of Wickster's Brook. Public footpaths exist along the western boundary of the Site with further footpaths located on the north-eastern and southwestern extent of the Site.
- 1.2.5 The Site is relatively flat with levels ranging from 15mAOD in the north-west corner to 25mAOD in the south-eastern corner.
- 1.2.6 The proposed Site is not located within a sensitive area (as defined by the EIA Regs) such as an Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), National Park (NP) or Conservation Area (CA) etc. The Site is also largely located within Flood Zone 1, with the

exception of the land immediately either side of the watercourse in the north-western corner of the Site.

1.3 Site Selection

- 1.3.1 There is no specific guidance regarding any geographic area that should be considered when assessing potential sites, it is considered reasonable to define the search area using distance to the Point of Connection (PoC) as the key parameter; that is a solar farm without a feasible grid connection is not viable.
- 1.3.2 The area of search is based upon the fact that capacity exists at the PoC to the electricity grid and, therefore, a location-specific opportunity is created to make a significant contribution towards renewable energy generation from this PoC.
- 1.3.3 A wider landholding as shown in Figure 1, was identified as being available for solar development. This area in particular was deemed suitable for solar development due to it being identified as having the lowest landscape sensitivity for a solar farm of this scale within the Council's Renewable Energy Resources Assessment (November 2019) – see Figure 2.

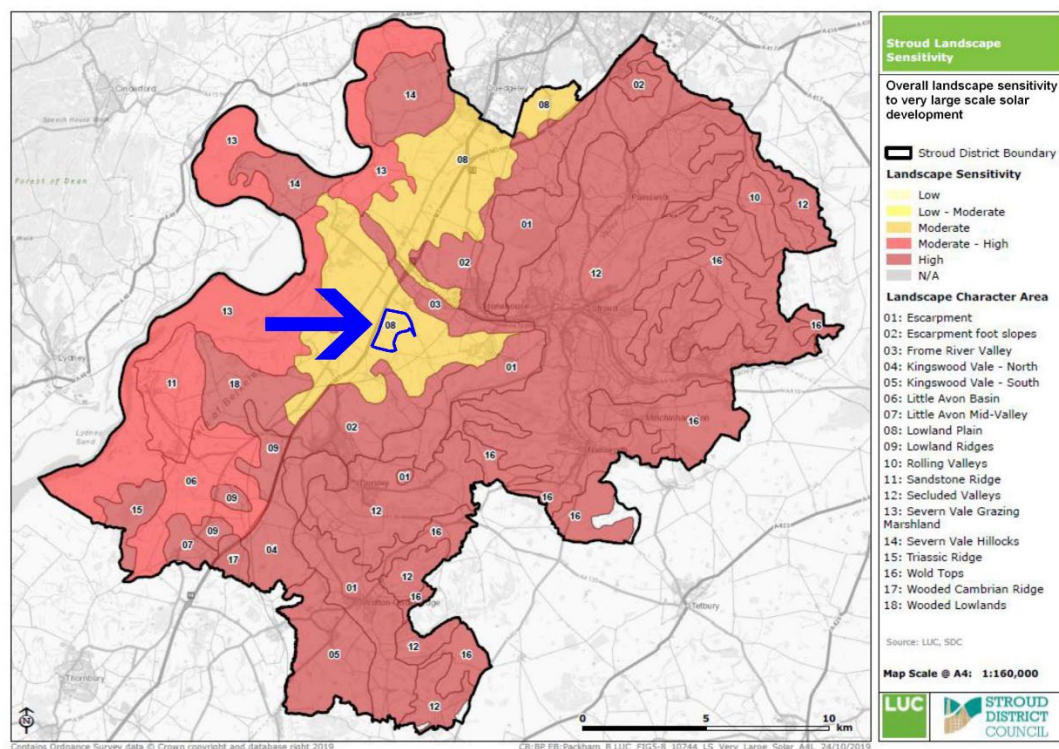


Figure 2: Extract from Stroud District Council's Renewable Energy Resources Assessment, November 2019.

- 1.3.4 The proposed Site area was refined from the wider landholding following site visits, taking into account proximity to sensitive receptors such as residential dwellings and access. As such, it was deemed preferable to locate the development adjacent to the M5 and within the north-western extent of the landholding next to this infrastructure corridor and away from more sensitive receptors. Areas of existing woodland will be buffered and existing field accesses utilised wherever possible.

1.4 Proposed Development

- 1.4.1 The proposed development consists of the installation of a ground mounted solar array with associated infrastructure. It is anticipated that the export capacity of the solar farm will be circa 40MW. The solar farm is anticipated to be able to supply approximately 12,224 households, correlating to 23% of the district's households. The proposed development is likely to occupy c.75 hectares after all assessments and detail design has been completed.
- 1.4.2 It is anticipated that the development will consist of the following:
- Panels – Fixed tilt, up to 3.1m rear elevation mounted on metal structures and tilted at 20-25 degrees;
 - Access tracks;
 - 132kV transformer compound;
 - Transformer blocks distributed across the Site;
 - Customer & DNO substations;
 - Spares container - Shipping container used for storage of equipment and spare components;
 - Boundary stockproof fencing, gates and inward-facing security cameras; and
 - Cabling between arrays and to connect to existing overhead line.

1.4.3 Some example images of the infrastructure are shown below:



1.4.4 A preliminary design layout can be seen below.

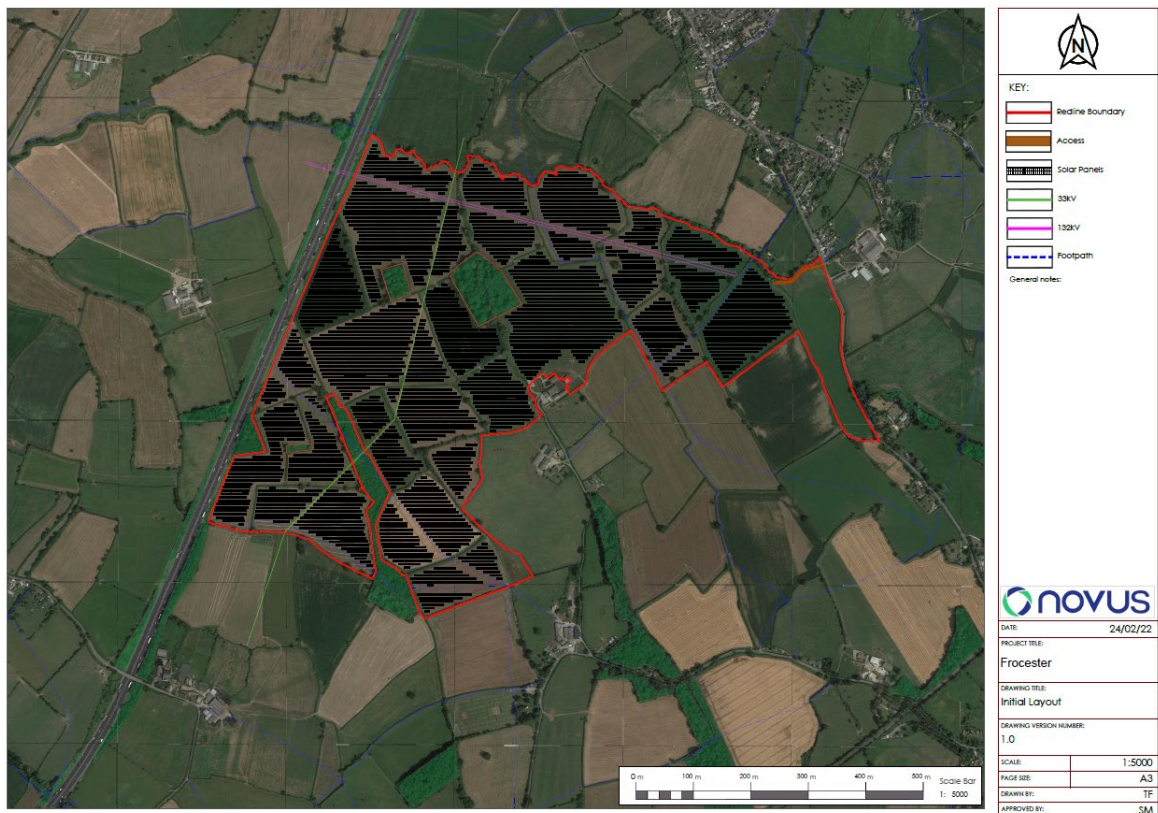


Figure 3: Indicative layout - The solar farm will be connected directly to the overhead powerline which crosses the Site, providing an efficient connection and avoiding the need for new overhead lines or new cabling work off site.

- 1.4.5 A buffer of at least 10m will be kept between watercourses and the development. Existing field accesses will be utilised where possible, however small sections of hedgerow may need to be removed to widen accesses or create new access points between fields. No tree removal is anticipated to facilitate the development.
- 1.4.6 There are a number of Public Rights of Way (PRoW) through the Site, namely footpaths EFR2; EFR3; EFR25; EFR27 and EFR32. A number of these are overgrown and underused or disconnected. These PRoWs could be retained with buffers and fencing between the PRoW and solar farm, or alternatively where footpaths pass directly through the Site, these could be considered for re-routing around the Site to follow the established natural desire lines that walkers take around the field margins.

1.5 Access

- 1.5.1 The proposed access into the Site consists of an existing field access off Bath Road. At this point, Bath Road is a two-way carriageway with a speed limit of 30mph increasing to 60mph circa 45m to the south of the access.



Figure 4: Proposed access to solar farm

- 1.5.2 Access will be required for construction which is anticipated to take approximately 16 weeks. Upon completion of the works, access will then only be required infrequently for maintenance purposes.

1.6 Request for Screening Opinion

- 1.6.1 A formal screening opinion is being sought from SDC to confirm that the proposed development comprises ‘non-EIA development’ as defined within the EIA Regs and therefore does not require an Environmental Statement. The EIA Regs are applied to certain types of development that may have significant effects on the environment. Different development types are categorised in the EIA Regs as Schedule 1 or Schedule 2 developments; dependent on a number of factors including the nature of the proposals, their location and scale, which are used to determine whether they are likely to have significant environmental effects.

1.7 Indicative EIA Screening Threshold

- 1.7.1 EIA development is defined within the EIA Regs as development which is either:

“(a) Schedule 1 development; or

(b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location”.

1.7.2 Schedule 1 development requires EIA in any event as they are highly likely to have a significant environmental impact. Solar development in the UK is not classed as Schedule 1 development.

1.7.3 Schedule 2 development constitute proposals that must be screened by the relevant planning authority to determine if significant effects are likely and ultimately if it is deemed EIA development or not. Development of this type is defined within the EIA Regs as *“development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where –*

a) Any part of that development is to be carried out in a sensitive area; or

b) Any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development.”

1.7.4 Schedule 2 development does not automatically require EIA. An EIA is only required for Schedule 2 development if it is ‘screened in’; on the grounds that it is likely to have significant effects on the environment due to factors such as size, nature, location and duration. If significant effects are not likely to arise as a result of the development, then the development must be ‘screened out’ and is therefore not an EIA development.

1.7.5 Solar arrays are not explicitly listed within Schedule 2 of the EIA Regs, however it is considered that the proposed development would fall under Schedule 2 Class 3(A) which refers to:

“Industrial installations for the production of electricity, steam and hot water”

1.7.6 The Site is not located within land defined as a ‘sensitive area’ within Regulation 2(1) of the EIA Regs.

1.7.7 As the proposed development is not sited within a sensitive area, the applicable thresholds and criteria need to be examined. The applicable thresholds for Class 3(A) defined above are *“an area in excess of 0.5ha”*. As the proposals exceed the 0.5ha threshold the development can be

argued to constitute Schedule 2 development. However, it remains that it is for the relevant planning authority to determine in their opinion if the proposal is likely to have significant environmental effects.

- 1.7.8 In addition to the thresholds stated in Column 2, guidance notes available for screening thresholds provide further indicative criteria and key issues to consider when determining if the proposal is indeed EIA development. The guidance notes state indicative criteria and threshold for Class 3(A) of Schedule 2:

“Thermal output of more than 50MW. Small stations using novel forms of generation should be considered carefully”

- 1.7.9 And key issues to consider for the same Part:

“Level of emissions to air, arrangements for the transport of fuel and any visual impact”

- 1.7.10 During operation the proposed development will not generate emissions to the air or require fuel.
- 1.7.11 In summary, the project would be considered as Schedule 2 development under Class 3(A). The area of works exceeds 0.5ha, however importantly the indicative threshold of 50MW would not be exceeded. As such, the level of emissions to air, arrangements for the transport of fuel and visual impact must be assessed as to whether this development constitutes ‘EIA development’ or not. The proposed solar farm will not involve any fuel transportation or emissions to air.
- 1.7.12 To aid review of the proposed development against screening criteria, we have also considered the development against Schedule 3 of the EIA Regs, particularly with respect to the environmental considerations for the Site.

1.8 Ecology

- 1.8.1 To inform this EIA screening request, an initial preliminary ecological appraisal (PEA) has been carried out at the Site. The Site walkover was undertaken in January 2022.
- 1.8.2 The initial findings from the survey are summarised below:

Wintering Birds

- 1.8.3 The Site does not appear to be well used by wintering birds. However, the Severn Estuary SPA and Ramsar are located approximately 3.2km to the west, as such, consultation with Natural England will be undertaken to determine the requirements for a Habitats Regulation Assessment (HRA). The existing solar farm at Hillhouse Farm is located closer to the SPA (approx. 2.5km) on the opposite side of the M5 to the Site and information on the Stroud District Council planning portal suggests that although full wintering bird surveys were undertaken no impacts on the designations were identified with that development.
- 1.8.4 Given the habitats on the Site, its location further from the Severn Estuary on the other side of the M5 and the lack of impacts at the Hillhouse Farm site, whilst it is deemed unlikely for there to be any impact, a full suite of wintering bird surveys will be undertaken this ecological season to confirm this and support the full planning application.

Breeding Birds

- 1.8.5 The developable area of the Site does not appear suitable for breeding birds with typical hedgerow and farmland species observed in the field boundaries. The Site largely comprises improved grassland, although some of this appeared to be newly sown fodder crop growing on previously arable fields. Breeding bird surveys have been undertaken. None of the primary interest features of the Severn Estuary SPA were recorded during any of the surveys. Whilst some Schedule 1 species were recorded foraging on along the watercourse and flying over the Site, they were not recorded nesting on Site therefore they are not deemed a constraint to the development. The full findings of these surveys will be detailed within a report to support future planning submissions.

Great Crested Newt

- 1.8.6 There are ponds on and in close proximity to the Site (within 250m). Habitat Suitability Index (HSI) Assessments were carried out for all ponds within 500m of the Site, the results of which can be found in appended PEA. Due to the nature of the development and habitat to be impacted, the zone of influence of 250m is deemed sufficient in this instance. As such, eDNA surveys to determine presence/absence were undertaken for ponds within 250m of the Site. All ponds returned negative results with the exception of two ponds which were positive. However given the location of the ponds, there will be no direct impacts from the proposals. The full findings from these surveys have been used to define the development

proposals and will be detailed within a report to support the full planning submission.

Badgers

- 1.8.7 There are badger setts on the Site, mostly confined to the woodland areas and boundaries, although some encroach into field edges. One sett was identified in a location that could influence the solar array location. A full badger survey was undertaken which confirmed no further badger setts. A 30m buffer from the badger setts will be maintained.

Bats

- 1.8.8 There are numerous mature trees with bat roost potential, but these are largely confined to woodland and hedgerows where they should be unaffected by the proposed solar farm. There are a few trees in the fields, away from hedgerows that have bat roosting potential (3-4 only). However, these will not be impacted by the works.

Otters, Water Vole and White-clawed Crayfish

- 1.8.9 There is potential for all of these species in the main streams through the Site. A buffer of at least 8-10m will be kept from watercourses to avoid any impact.

Reptiles

- 1.8.10 There is some suitable habitat on Site, but largely restricted to the field boundaries and edges of the streams. These areas will be avoided and retained, and any temporary impacts will be dealt with by habitat management.

Dormouse

- 1.8.11 The Site is suitable, but the hedgerows and woodland are unlikely to be significantly impacted, other than a limited number of breaks for access and the occasional widening of existing field gates which could be completed under a method statement.

Hedgerows

- 1.8.12 These are all heavily managed and would not classify as being Important under the Hedgerow Regulations.

Habitats

- 1.8.13 The hedgerows are heavily managed, and the majority of the fields are intensively farmed and of minimal habitat value. The proposed development has the potential to increase the biodiversity of the Site by reducing the intensively farmed nature of the land and creating new and varied habitats.
- 1.8.14 A full Ecological Impact Assessment (EclA) will be prepared to support the planning application. Taking account of potential mitigation and compensation measures and considering the generally low value of the habitats present within the Site it is considered that the proposed development with good design is likely to result in an overall net gain for biodiversity and that impacts on particular species of conservation concern can be fully mitigated and or compensated such that the proposed development is **unlikely to result in a significant adverse impact on ecological features**.

1.9 Heritage & Archaeology

Designated Assets

- 1.9.1 There are no designated heritage assets within the Site boundary and therefore there will not be any physical impact to any designated heritage assets as a result of the development.
- 1.9.2 Within 1km of the Site red line, 34 designated heritage assets are recorded by the National Heritage List for England, these comprise the following:
- 2 x Grade II* Listed Buildings
 - 32 x Grade II Listed Buildings
- 1.9.3 The two closest designated heritage assets to the Site are 'Thatched Cottages' (List Entry Number: 1171561) and 'Osborne House including walled courtyard with coach house and stables and adjoining garden wall' (List Entry Number: 1171532) both of which are Grade II and are within c. 50m of the Site boundary.
- 1.9.4 The southern boundary of the 'Stroud Industrial Heritage Conservation Area' is located c. 750m northeast of the northern boundary of the Site on the edge of Eastington.

- 1.9.5 No Scheduled Monuments, Registered Battlefields, Registered Parks and Gardens are recorded within 1km of the Site boundary.

Non-Designated Assets

- 1.9.6 Within the Site several non-designated heritage assets are recorded which are medieval and post-medieval in date and are associated with agricultural activity, these include ridge and furrow, banks and several extant farmsteads. An area of almost contiguous medieval to post-medieval ridge and furrow was visible as earthworks on aerial photographs and was mapped as part of the Severn Vale NMP project
- 1.9.7 The industrial history of the area is demonstrated through the presence of the mineral railway built in 1917 to link Frampton gravel pits with Frocester Station which is still visible in the east of the Site as a levelled earthwork on aerial photographs. The railway was demolished by 1947 but evidence of the gravel ridge was identified during the construction of the M5 motorway.
- 1.9.8 An undated tump or barrow is recorded in the Site which, when first reported, the mound measured 12m by 21m, was 1m high and was respected by ridge and furrow present in the same field. When the site was visited in 1998, the monument was barely visible, standing to less than 0.05m in height, and it had been spread by ploughing to an approximate diameter of 18m. There was also no indication that the reported ridge and furrow had survived the ploughing of the field which is undertaken at considerable depth (well over 0.3m).
- 1.9.9 Similarly undated remains include an area of cropmarks visible on aerial photographs taken in 1994 which were mapped as part of the Severn Vale NMP project. These assets comprised a possible sub-rectangular enclosure with a series of rectilinear sub-divisions in a field to the north of Bridge Farm, Frocester. The undated possible enclosure is orientated north-south and measures roughly 140m by 70m and has tentatively been assigned a prehistoric date.
- 1.9.10 Partially within and immediately to the east of the Site is the projected line of the Arlingham - Westonbirt Roman Road (Margary RR543), whilst Roman activity has been definitively identified to the south of the Site where a Roman villa has also definitively been identified in the vicinity of St Peters Church. Later excavations have also identified a succession of small 3rd - 4th century Roman buildings. It is considered that the Roman

period site extends to the fields north and east of the church with a distinct spread of building rubble and tiles being identified as a result of recent ploughing. It has been suggested that Roman settlement in the vicinity of St Peters was substantial, covering about 4ha around the church, and high-status including tesserae and hypocaust.

Geophysical Survey

- 1.9.11 A geophysical survey over c. 103.8ha was undertaken in April and May 2022 via a quad-towed and hand-carried GNSS-positioned fluxgate gradiometer.
- 1.9.12 Several areas of archaeological activity were identified across the southwest, centre, northeast and east of the survey area. These anomalies have been interpreted as a series of rectilinear enclosures, with possible associated trackways, along with two more isolated enclosures.
- 1.9.13 These features are undated but their morphology is potentially indicative of late prehistoric and/or Romano-British activity.
- 1.9.14 The geophysical results also reflect the long-term agricultural use of the survey area in the form of former mapped field boundaries, ridge and furrow regimes, a former pond and drainage systems. Modern ploughing has also been identified across the survey area.
- 1.9.15 Anomalies of undetermined origin were also detected; it was not possible to definitively determine whether these anomalies are the result of a change in superficial deposits or archaeological, agricultural or modern practices.

Summary

- 1.9.16 Whilst no designated heritage assets lie within the Site or will be physically impacted by any proposed development, the setting of several designated heritage assets may need to be considered and assessed to ensure that any development is sympathetic to these assets.
- 1.9.17 Non-designated heritage assets within the Site were considered to be relatively scarce although this was considered to be a product of the lack of previous investigation of the area and it was considered that there was a moderate – high potential for archaeological remains of Roman and earlier periods to survive within the Site. This assessment was borne out by the geophysical survey which identified several areas of archaeological

interest within the Site which, on a morphological basis, have been provisionally dated to the Iron Age and/or Roman-British periods.

- 1.9.18 A Written Scheme of Investigation for archaeological evaluation, via trial trenching, has been agreed with the Gloucestershire County Council Archaeologist Rachel Foster.
- 1.9.19 The evaluation, representing approximately 1% sample of the Site with a 1% contingency for further evaluation will examine, assess and record the extent, preservation, age/date, characteristics, form and any further details available, of any archaeological remains present and to provide enough information to inform upon any mitigation strategy following completion of works, if required.
- 1.9.20 The results of the geophysical survey and archaeological evaluation will be used, where possible, to create design solutions to preserve archaeological remains in-situ. In the event of archaeological loss being unavoidable, the loss can be mitigated via a suitable and proportionate level of archaeological investigation and recording i.e. preservation by record. **As such, the development will not give rise to significant effects.**

1.10 Agriculture

- 1.10.1 Parts of the site are currently used for arable and grazing purposes. The site is classed as Grade 3 according to the Provisional Agricultural Land Classification Map published by Natural England. An Agricultural Land Classification survey will be undertaken to support the full planning application and determine the specific classification of the land.
- 1.10.2 The proposed development would enable the diversification of agricultural land, while also supporting the delivery of crucial renewable energy. Additionally, the design of the solar panel arrays would enable the continued agricultural use of land for activities such as grazing alongside the generation of renewable energy during the operational phase, increasing the overall productivity of the land. It is not therefore a choice between energy and agriculture, as the development proposes a continued agricultural co-use of the site.
- 1.10.3 Although the proposed development would be in operation for 40 years, it is a temporary project that would not result in the loss or degrading of agricultural land.

- 1.10.4 Having regard to the predicted grading of the land, the temporary nature of the proposed development, and existing intensive agricultural use of the site **no significant effects on agricultural land use are considered likely.**

1.11 Landscape and Visual

- 1.11.1 The Site is not situated within any statutory landscape designations such as an AONB. The Cotswolds AONB is situated 2.4km south-east of the Site.
- 1.11.2 The Site is immediately adjacent to the M5, with the surrounding landscape being predominantly low-lying. The surrounding area is characterised by arable and pasture farmland with associated farmhouses and the settlements of Frocester, Eastington and Dursley to the east, north and south respectively.
- 1.11.3 Whilst there are public footpaths present within the Site, these are largely overgrown and underused or disconnected by the M5 motorway. Following relevant discussions with the Council's PRow officer, the final design of the solar farm will either retain these PRow with buffers and fencing between the PRow and solar farm, or alternatively where footpaths pass directly through the Site, these will be re-routed around the Site to follow the established natural desire lines that walkers take around the field margins.
- 1.11.4 As outlined in Section 1.3.3 above, this area of land has been deemed suitable for solar development due to it being identified as having the lowest landscape sensitivity for very large solar farms within the Council's Renewable Energy Resources Assessment (November 2019) – see Figure 2.
- 1.11.5 A preliminary Zone of Theoretical Visibility has been prepared with key viewpoints which accompany this request. A full Landscape and Visual Impact Assessment (LVIA) will be undertaken to inform the final layout of the Site and any planting mitigation required, taking into account any cumulative impact with nearby development. LVIA specific pre-application advice is being sought from SDC prior to the submission of a full planning application.
- 1.11.6 Taking account of the suitability of the land for solar development combined with retaining all trees and hedgerows, **the Proposed Development is unlikely to result in a significant adverse impact on the surrounding landscape.**

1.12 Access & Traffic

- 1.12.1 As outlined in Section 1.5, the proposed access into the Site consists of an existing field access off Bath Road. At this location, Bath Road is a two-way carriageway with a speed limit of 30mph increasing to 60mph circa 45m south of the access. The access is currently used regularly by large agricultural machinery.
- 1.12.2 Access will be required for construction which is anticipated to take approximately 16 weeks. During this period, there would be trips associated with construction staff accessing and departing the Site and the delivery of materials. The traffic movements associated with the delivery of materials will largely consist of small-medium Heavy Goods Vehicles (HGVs). A Construction Traffic Management Plan will be prepared to ensure appropriate routing and timing of these trips so to minimise any adverse impact to local road users. The site is located within close proximity of Junction 13 of the M5 motorway and it is anticipated the majority of vehicles would route to site from here.
- 1.12.3 Upon completion of the works, access will only be required infrequently for maintenance purposes.
- 1.12.4 A Transport Statement and Construction Traffic Management Plan will be prepared to support the full planning application following relevant consultation with the Council's highways team. Appropriate management will be outlined within these assessments which will ensure there will be **no significant adverse impacts on the local highway network**.

1.13 Noise & Air Quality

- 1.13.1 The Site is not located within an Air Quality Management Area and there are very few sensitive receptors located within close proximity to the Site. Furthermore, the construction phase of development is not anticipated to require high levels of vehicular traffic and during operation, the solar farm will not lead to emissions to air. Measures will be implemented during the construction phase in accordance with current environmental standards to prevent pollution and nuisance. As such, it is considered that an air quality assessment is not required.
- 1.13.2 There is the potential for noise and vibration impacts during the construction of the proposed development. However, given that these

would be limited to the short construction period, these are not considered to be significant.

- 1.13.3 The Site is proposed away from residential receptors and infrastructure will be designed to minimise emittance of noise. Due to the nature of the development, the solar farm is unlikely to result in measurable increases in noise levels during operation.
- 1.13.4 As such, **the proposed development will not cause significant effects on the local air quality and noise levels.**

1.14 Flood Risk

- 1.14.1 The Site is located mostly within Flood Zone 1, with the exception of areas surrounding Wickster’s Brook which fall within Flood Zones 2 & 3.
- 1.14.2 It will be ensured that the proposed development does not increase flood risk to any third parties. All equipment will be raised appropriately above designed flood levels to ensure **the proposed development does not cause significant effects to the surrounding water environment.**
- 1.14.3 A full Flood Risk Assessment & Surface Water Drainage Strategy will be prepared to support the full planning application.

1.15 Planning Policy Review

- 1.15.1 The Stroud District Local Plan was adopted in November 2015 and provides the strategic policy framework for the area up to 2031. The table below outlines the relevant planning policies to the proposed development.

Policy Ref	Policy Name
Strategic Objective S05	Climate Change & Environmental Limits
Policy CP1	Sustainable Development
Policy CP14	High Quality Sustainable Development
Policy CP15	A Quality Living & Working Countryside
Policy ES1	Sustainable Construction & Design
Policy ES2	Renewable of Low Carbon Energy Generation
Policy ES4	Water Resources, Quality and Flood Risk
Policy ES6	Providing for Biodiversity & Geodiversity
Policy ES7	Landscape Character
Policy ES8	Trees, Hedgerows and Woodlands
Policy ES10	Valuing our Historic Environment & Assets

Policy ES12	Better Design of places
Policy EI5	Farm Enterprises & Diversification

- 1.15.2 Delivery Policy ES2 states that *“the Council will support proposals that maximise the generation of energy from renewable or low carbon sources, provided that the installation would not have significant adverse impact”*. The proposed development, which will have the capacity to supply approximately 39% of the District’s households, will provide a renewable energy source and assist in contributing to the Council’s target of 30-35% of the district’s electricity to come from renewable sources.
- 1.15.3 Full consideration and justification as to how the development accords with these policies will be provided in the supporting statement submitted with the full planning application.
- 1.15.4 A review of the pre-submission draft plan (May 2021) has also been carried out. The most notable change relevant to the development being the proposed inclusion of landscape sensitivity maps from the Stroud District Renewable Energy Resources Assessment (November 2019). Within this assessment the Site is largely identified to be land suitable for solar development. The Site is shown to have a ‘low’ landscape sensitivity to small scale and medium scale solar developments. The Site is shown to have low-moderate landscape sensitivity to large scale solar developments and moderate landscape sensitivity to very large scale solar developments. This Site has the lowest landscape sensitivity within the District for this scale of development, therefore this land is deemed the most suitable for solar development.
- 1.15.5 An Emerging Core Policy (DCP1) is also relevant to this development as it outlines the Council’s target of being Carbon Neutral by 2030. This policy states that *“decentralised renewable and low carbon energy schemes will be supported and encouraged and approved where their impact is or can be made acceptable”*.
- 1.15.6 Further to Stroud District Council’s target of being Carbon Neutral by 2030, Gloucestershire County has a target of delivering a carbon neutral county by 2050 – outlined within Gloucestershire Sustainable Energy Strategy (January 2019).
- 1.15.7 In addition to Local Policy, there is National Policy in the form of the National Planning Policy Framework (NPPF), Paragraphs 8, 11 (Sustainable

Development), 154, 155, 158 (Low Carbon & Renewable Energy) of which are relevant to the proposed development.

1.15.8 Paragraph 158 of the NPPF, in particular, states that “*When determining planning applications for renewable and low carbon development, local planning authorities should:*

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if 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.”

1.15.9 As stated above, the Site has been identified as having the lowest landscape sensitivity for solar developments. Furthermore, the proposed development is unlikely to give rise to any significant adverse impacts, as such the development can be deemed to align with this policy.

1.15.10 New guidance on solar development has been proposed by the government as part of its review into the Energy National Policy Statements. A draft National Policy Statement for renewable energy (including solar) EN-3 is currently under consultation. This policy statement provides further guidance to developers as well as determining authorities. The guidance states that “*The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government’s strategy for low cost decarbonisation of the energy sector.*”

1.15.11 The solar farm at the Site will be designed to be in line with this draft guidance and full justification will be provided within the planning statement accompanying the full planning application.

1.16 Planning Application

1.16.1 Following review of Stroud District Council’s Local Validation Checklist it is proposed that the full planning application will be supported by the following:

- National application requirements including: a completed application form, detailed drawings including site location plan; planning supporting statement (including a design & access statement).
- Heritage and Archaeological Desk-Based Assessment
- Ecological Impact Assessment (including PEA, Badger, Breeding Birds, Wintering Birds, GCN surveys)
- Flood Risk Assessment & Surface Water Drainage Strategy
- Landscape & Visual Impact Assessment
- Transport Statement including a Construction Traffic Management Plan
- Agricultural Land Classification Report

1.17 Conclusions

- 1.17.1 This screening request outlines why the development is deemed to be non-EIA development. The development can be considered to fall under Schedule 2 of the EIA Regulations under Class 3A. As the area of land exceeds 0.5ha in size, a screening opinion request is required from the relevant authority to confirm whether the development is deemed to be non-EIA development. The proposal is not deemed to have significant effects on the environment by virtue of its characteristics or location.
- 1.17.2 This formal screening request has been made to SDC, on behalf of Novus Renewable Services Limited, for the proposed installation of a solar array across approximately 102 ha of land, with a capacity of circa 40MW. This request is made under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.17.3 The information included within this report and supporting documents are deemed to satisfy the requirements as outlined in Regulations 6 of those Regulations.
- 1.17.4 Planning Practice Guidance suggests that EIA should only apply to projects which are likely to have significant effects on the environment. This report demonstrates that the proposals will not result in any significant effects on the environment. Therefore, whilst the proposals can be considered to

constitute a Schedule 3 development, it is considered that it does not constitute EIA development.

- 1.17.5 Consequently, it is requested that the determining planning authority respond formally with the opinion the proposals are non-EIA development.

