

SOUTH PLANNING COMMITTEE**SCHEDULE OF ADDITIONAL LETTERS****Date: 19th September 2023**

NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting

Item No.	Application No.	Originator:
5	22/05424/EIA – Rock Farm Solar	Cclr. Richard Huffer
<p>The application for a Solar Farm at Rocks Green is on the agenda for consideration. I would be grateful if you could table or minute my concerns as below;</p> <p>Undoubtedly there are concerns relating to the cumulative affect of the existing solar farm. The one recently approved and now this application. It is worth noting that Ludlow recently has been voted the number 7th most beautiful place in the country to visit.</p> <p>There remain issues around land classification and our own food security, which need to be considered.</p> <p>But my main concern is for the protection of a listed English Heritage site dating back to 1610, with an historic history including a most attractive deer park and lodge. Substantial gardens and stately home of great significance in its own right and to Ludlow and its surrounding area.</p> <p>To truly appreciate the impact of this application one needs to stand within the gardens or the deer park of this magnificent heritage site.</p> <p>I remain committed to renewables and solar, but I am adamant that this application has done nothing to protect the vista and historical views of Ludlow that past generations have appreciated.</p> <p>I therefore recommend that this application is refused or a deferral made that would allow time for changes to the application, which would aid the protection of huge irreversible impact on a recognised asset to the South Shropshire and the heritage site.</p>		
Item No.	Application No.	Originator:
5	22/05424/EIA – Rock Farm Solar	Officer correspondence with Historic England

From: Graham French
Sent: 15 September 2023 11:47
To: Allen, Tim <Tim.Allen@HistoricEngland.org.uk>
Cc: Andy Wigley <andy.wigley@shropshire.gov.uk>; Tabitha Lythe <Tabitha.Lythe@shropshire.gov.uk>; Charlotte Morrison <Charlotte.Morrison@shropshire.gov.uk>
Subject: RE: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm

Thank you Tim,

I will ensure that your comments are included in the additional representations report which will be circulated to Members on the Monday before the committee.

The planning committee will need to assess the nature of the impact to the setting of the deer park and consider whether the public benefits of the solar farm scheme are sufficient to outweigh the less than substantial harm which has identified. They will also need to assess whether the applicant has responded appropriately to the heritage concerns including the adequacy of the 70-140m stand-off and planting belt which are proposed.

The committee will visit the site on the morning of the committee and will have the opportunity to look at the site in relation to the deer park both from Rock Farm to the west and from Squirrel Lane to the south.

Regards

Grahame

Grahame French
Principal Planner
Tel: 01743 258714; Mob: 07815 473271
www.shropshire.gov.uk/planning.nsf



From: Allen, Tim <Tim.Allen@HistoricEngland.org.uk>
Sent: 15 September 2023 11:01
To: Graham French <graham.french@shropshire.gov.uk>
Cc: Andy Wigley <andy.wigley@shropshire.gov.uk>; Tabitha Lythe <Tabitha.Lythe@shropshire.gov.uk>; Charlotte Morrison <Charlotte.Morrison@shropshire.gov.uk>
Subject: Re: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm

Some people who received this message don't often get email from tim.allen@historicengland.org.uk. [Learn why this is important](#)

Dear Graham

Thank you for getting back to me. I've reviewed the material you have shared.

1) Setting effects, the parks as designated assets in their own right and as designed setting to the listed hall borrow the rising ground to the SE as setting this includes the kinetic experience as well as fixed point views. This contributes to the significance of the assets and on that basis our advice stands as set out in my colleague's advice letter further to NPPF 195, 199, 200 and 202. The absence of right to a view is not the issue - setting effects on designated assets are a

weighted material consideration as set out in the NPPF and PPG. Further to NPPF 195 your authority should seek to address conflict between any part of the scheme and the conservation of heritage assets.

2) Archaeological matters - we refer you to the expertise of the County archaeological advisors.

Our heritage concerns remain, it will be for the authority to determine the case in line with statute, policy and guidance.

Yours sincerely,
Tim

Tim Allen MA FSA
Development Advice Team Leader (North)

Midlands Region
Historic England
The Foundry, 82 Granville Street, Birmingham B1 2LH

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From: Graham French <graham.french@shropshire.gov.uk>

Sent: Friday, September 8, 2023 10:58:29 am

To: Allen, Tim <Tim.Allen@HistoricEngland.org.uk>

Cc: Andy Wigley <andy.wigley@shropshire.gov.uk>; Tabitha Lythe <Tabitha.Lythe@shropshire.gov.uk>; Charlotte Morrison <Charlotte.Morrison@shropshire.gov.uk>

Subject: RE: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm

Dear Tim,

I have raised this query with the applicant who has responded with the enclosed attachments. They are maintaining that the proposed planted buffer will preserve views looking westward from within the deer park. Photomontages from a representative viewpoint within the park from year 1 are provided in the LVIA and are reproduced below. There is a glimpse view of the arrays to the right of the picture in the winter view which is less pronounced in the summer view. The proposed planting is expected to close this view by year 8.

The photomontages do not appear to suggest that planting on front of the arrays will materially affect the existing degree of openness as experienced from the viewpoint. The applicants heritage statement advises that the deer park does not appear to have been designed to make focal points opening up into the surrounding landscape. There are no tree lined avenues looking towards the site and focusing on external viewpoints. Instead, planting is concentrated and has been maintained particularly along the estate boundaries and the park appears to be designed so that it is appreciated principally from within. It is recognised that the current use of the site as a function venue may lead to its appreciation in a different way but there is no 'right to a view' in UK

planning. Ultimately the Council's southern area planning committee will need to consider whether the extent of any 'less than substantial harm' to the setting of the park can be justified in terms of public good by the renewable energy benefits of the scheme, taking account of the mitigation measures which also include the provision of c106% biodiversity net gain and 50% gain in hedgerows within the local landscape.

Bitterley and Ludford Parish Councils have stated that the same 300m stand-off should apply as for the 2015 'Henley 1' scheme which was approved on appeal. However, the context differs in that Henley 1 came forward under the feed in tariff subsidy scheme whereas the current development has to fund itself in the absence of subsidy. Significant reduction in the array footprint would potentially raise serious viability issues. Also, Henley 1 is due south of the park whereas the current scheme is due west. Additionally, the national context in which renewable energy is considered has evolved over the past 8 years and in 2018 Shropshire Council declared a climate emergency. Any stand-off precedent established by Henley 1 must be seen in this changed context.



Winter view year 1



Summer view year 1

In terms of archaeology the Council's archaeology team gave the following response on the proposals in July following the receipt of further archaeological survey information from the applicant:

4.10bi. SC Archaeology (30/07/23): No archaeological objection. Following on from our previous consultation of 5 January 2023, the results of pre-determination archaeological evaluation (geophysical survey and phase 1 trial trenching) have been submitted for our consideration. The geophysical survey, undertaken across the entire proposal site, identified anomalies of possible

archaeological origin in two of the fields (Field 12 and Field 13). Whilst not identified as an anomaly by the geophysical survey, Field 13 also contained the ¿single ditched circular cropmark enclosure of possible Iron Age¿Roman date¿ recorded on the Historic Environment Record (HER PRN 02159). As noted in our previous consultation, this cropmark would be better described as a 'ring-ditch', possibly the remains of a Bronze Age burial mound.

- ii. *Pre-determination trial trenching has now also been completed across Fields 12 and 13 (ECUS, 2023). Two of the trial trenches encountered the ring ditch and several other undated archaeological features in its vicinity. A further phase of trial trenching across the remainder of the site is required post-determination to identify any further archaeological remains which may be present. The results of the trial trenching will determine a proportionate mitigation strategy, which could include preservation in-situ or preservation by record through archaeological investigation. The latter may comprise an archaeological excavation or a watching brief on groundworks, dependent upon the significance and complexity of the archaeological assets to be impacted and the nature, depth and extent of groundworks.*
- iii. *Designated Heritage Assets - This recommendation relates solely to the potential impacts to the Scheduled Monument, Caynham Camp, a large univallate hillfort 700m north west of Caynham ¿ (NHLE no. 1010313). We would defer to Historic England and the Conservation Officer regarding listed buildings and the registered park and garden. The Heritage Impact Assessment (ECUS, 2022), which accompanies the application, has assessed the contribution of the setting to the heritage significance of Caynham Camp, and any potential impacts arising from the proposed development. The Heritage Impact Assessment concludes that whilst there would be glimpses of the site from the Scheduled Monument, particularly during the winter months, it would not result in harm to its heritage significance. We note that Historic England in their response dated 12 January 2023 raised no specific comments regarding the potential impact of the proposals upon the setting of the Caynham Camp Scheduled Monument. Without prejudice to any further comments which Historic England may raise, we would have no comments to make upon the conclusions made by the HIA in regard to the Scheduled Monument.*
- iv. *Non-designated heritage assets (buried archaeological remains) - In view of the above, and in relation to Paragraph 205 of the NPPF and Policy MD13 of the SAMDev component of the Shropshire Local Plan, it is advised that a programme of archaeological work be made a condition of any planning permission for the proposed development. The archaeological requirements will comprise:*
 1. *Written Scheme of Investigation (WSI) for a second phase of trial trenching across the remainder of the proposed development site.*
 2. *An Archaeological Mitigation Strategy (AMS) based upon the results of the trial trenching (phase 1 and phase 2).*

The AMS will detail the proposed archaeological mitigation strategies across the site. This will include the methodologies for the preservation of identified archaeological remains, where required, and set out details of further archaeological investigation or monitoring where there is the potential for groundworks to impact upon identified archaeological remains. Such archaeological investigation may take the form of excavation and/or a watching brief. Any subsequent intrusive archaeological investigation required to mitigate the impacts of the development will require a further WSI to be submitted for approval by the LPA prior to commencement of the works. (An appropriate condition is included in Appendix 1)

The application is scheduled to be considered by Shropshire Council's southern area planning committee on 19th September. The full comments of Historic England and other heritage consultees have been included in the committee report.

Please don't hesitate to contact me if you wish to discuss this.

Regards

Grahame

Grahame French
Principal Planner
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From: Allen, Tim <Tim.Allen@HistoricEngland.org.uk>
Sent: 07 September 2023 13:00
To: Graham French <graham.french@shropshire.gov.uk>; planning.southern
<planning.southern@shropshire.gov.uk>
Subject: RE: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm
Importance: High

Dear Graham

Julie Taylor, my colleague who was the Inspector of Historic Buildings and Areas covering your authority has moved on to a new role in local government.

I am reviewing where we are with cases she commented on – I note the concerns we expressed regarding this scheme as affecting the designed landscape setting of the Grade II* listed Henley Hall (and its GII registered park) as attached and in respect of archaeological assessment.

What have you been able to resolve with the applicant further to NPPF 195 (local authority to seek to minimise conflict between any aspect of development and conservation of the significance of heritage assets)? As you'll note from the attached we did not regard concealing the affected areas of setting with tree planting as sufficient and were looking for some step-back in the array.

Have you received additional archaeological reports to address the adequacy of assessment in this regard that we highlight in our letter - further to para 194 (in which respect see also the advice of your own archaeological advisors)?

Many thanks
Tim

Tim Allen MA FSA
Team Leader (Development Advice)

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Item No.	Application No.	Originator:
5	22/05424/EIA – Rock Farm Solar	Applicant's Heritage Consultant – response to Historic England

Dear Mr French,
RE: Planning Application ref. 22/05424/EIA - Proposed Solar Farm SE of Rock Farm, Rocks Green, Ludlow, Shropshire
Ecus Ltd, on behalf of the Applicant, Anglo Renewables, are contacting you with regard to planning application ref. 22/05424/EIA *Proposed Solar Farm SE of Rock Farm, Rocks Green, Ludlow, Shropshire* on land south east of Rock Farm in Rocks Green, Ludlow, Shropshire (hereafter the Site).

As part of the planning application an Archaeological Desk-Based Assessment and a Heritage Impact Assessment was produced by Ecus Ltd in September 2022 (Ecus ref. 18349.1-18349.2). Ecus Ltd were also responsible for producing the Historic Environment chapter in the Environmental Statement produced by Harris Lamb (the Agent) as part of the planning application. We understand that consultee comments were received from both Historic England (their ref. P01553652; dated 12 January 2023) and the Conservation Officer to Shropshire Council (dated 19th January 2023). Ecus Ltd provided a response on the 7th February to these comments; both referred to a revision in plans to accommodate a buffer zone between the Grade II Registered Park and Garden (RPG), Henley Hall (List Entry ref. 1001124), and the separation of solar panels from the boundary of the RPG.

It is noted that within their statutory consultees response, Historic England have not raised a statutory objection to the scheme. Furthermore, the Shropshire Conservation Officer concurs with the Heritage Impact Assessment that the scheme will have less than substantial harm on the Registered Park and Garden of Henley Hall. In accordance with National Planning Policy Framework (NPPF) paragraph 202, where this harm should be weighed against the public benefits of the proposal.

Impact and Effect on the RPG

Regarding the setting of Henley Hall, since 2021 Ecus Ltd have been working with the Applicant and the Agent, in an advisory capacity, on the design of the proposed solar scheme at the Site. This included several site visits with initial advice provided upon initial proposed designs and providing recommendations during the evolution of the design. Ecus Ltd also worked closely with the landscape and ecology teams involved in the project, to discuss the proposed solar scheme in relation to the historic environment. From the outset, the RPG, Henley Hall, and its associated Listed Buildings has been a key consideration due to their location. A screening opinion was also undertaken with Shropshire Council and the overall design is influenced by the comments received.

The Heritage Impact Assessment produced by Ecus Ltd in September 2022 undertook a detailed assessment in accordance with professional standards and guidance, and planning policy. It concluded that the scheme would result in *less than substantial harm (lower end)*. This level of harm was concluded for the following reasons:

- No changes are proposed to the designated area of the RPG;
- The change is proposed to part of the wider estate and not the designated landscape within the RPG;
- The height and layout of the solar scheme has been designed in accordance with existing boundaries;
- No renewable energy infrastructure be located within those fields/parts of those fields which lie adjacent to the southern boundary of the RPG. An undeveloped gap is proposed;
- No vehicular access points within proximity to the boundary of the RPG and vehicle access routes within the field parcels in the northern extent of the Site are limited and located as a distance from the RPG;
- The layout of the solar panels has been arranged in accordance with the existing field system and field boundaries. It would not therefore garment the field system or alter the landscape pattern and grain. The Site would therefore remain intelligible as an area of agricultural landscape;
- Historic hedgerows, hedgerow trees and field patterns previously lost during modern intensive agricultural farming would be reinstated;
- Additional planting comprising a native woodland belt, similar to those around the perimeter of park was proposed and which in turn have landscape and ecological benefits;
- The solar scheme is temporary and reversible;
- The solar scheme would not result in the total loss or vitiate of the heritage significance of the RPG altogether; and

- The heritage interests of Henley Hall would remain and the legibility of the agricultural landscape would continue to be understood, experienced and appreciated.

Photomontages

As part of the planning application a series of photomontages were produced. The photomontages produced provide worst-case scenarios. Despite this, these illustrate that the agricultural nature of the Site and degree of openness experienced from these viewpoints would continue to be experienced. They illustrate that once the proposed planting matures it will screen the potential visibility of the solar scheme. This was assessed in detail in the Heritage Impact Assessment produced by Ecus Ltd in Section 5.

Buried Archaeology

Buried archaeology has been addressed by a geophysical survey and programme of pre-determination trial trenching in the Site; the results of which have informed the production of an Archaeological Mitigation Strategy (AMS) produced by Ecus Ltd in August 2023 (Ecus ref. 21484). Through discussions with the Local Planning Authority Archaeologist, a programme of post-determination works has been agreed and we understand a suitably worded condition has been provided by the Archaeological Advisor to the Local Planning Authority. The level of information relating to the buried archaeological resource is sufficient to make an informed decision in accordance with paragraph 194 of NPPF.

Planning Condition

As the Applicant recognises the opportunity the Site provides to increasing renewable power in relation to both climate change and energy self-sufficient and is committed to delivering a design that is not substantially harmful to the historic environment, the Applicant would also agree to a planning condition

which would further reduce the perceived impacts to the RPG and alleviate the concerns expressed by Historic England. Such condition would accord with paragraph 195 of the NPPF and could comprise the:

- Removal of the first four rows of solar panels closest to the RPG. This would increase the buffer between the solar scheme and RPG by an additional 20 m; and
- Reduction in height of a further c. 40 m of solar panels by 0.8 m. This would further reduce the perceived height of the solar panels which are already designed to be lower to accord with their surroundings. The reduction would reduce the height from 3.2 to 2.4 m.

In light of the measures above, and proposed condition, we consider that the request for minor modifications through setbacks and additional reduction in the heights of the array addresses Historic England' comments and their concerns have been alleviated. Historic England's comments regarding the buried archaeological resource are outdated and have also been fully addressed.

Yours sincerely,

Emily Taylor

Senior Heritage Consultant

M: 07943 286 642

E: emily.l.taylor@ecusltd.co.uk

Item No.	Application No.	Originator:
5	22/05424/EIA – Rock Farm Solar	Officer – Agent correspondence on heritage

From: Paul Barton <paul.barton@harrislamb.com>

Sent: 18 September 2023 09:44

To: Graham French <graham.french@shropshire.gov.uk>

Cc: James Stone <james@anglo-renewables.co.uk>; Patrick Downes <patrick.downes@harrislamb.com>; Paul White <Paul.White@ecusltd.co.uk>; emily.l.taylor@ecusltd.co.uk

Subject: RE: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm

Morning Grahame,

Please find attached a statement regarding Historic England's concerns.

We note Historic England's concerns are not a formal objection. Notwithstanding this, we agree with the condition below, but should emphasise this is a concession based on pragmatism, rather than the current scheme being in any way inappropriate.

It is our, and your Conservation team's, position, that the scheme is appropriate-at the low end of less than substantial, outweighed by public benefits- for all the reasons we have discussed over the past couple of years.

We will get a statement regarding the community benefit later this morning.

I hope this helps, but if you require any further information, please let me know.

Paul Barton

Director

From: Graham French <graham.french@shropshire.gov.uk>

Sent: Friday, September 15, 2023 3:07 PM

To: Paul Barton <paul.barton@harrislamb.com>

Cc: James Stone <james@anglo-renewables.co.uk>

Subject: RE: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm

Thanks Paul,

This is helpful and I look forward to receiving the supplementary heritage statement. I also note your comments in relation to community benefit funding.

I enclose a suggested draft of the proposed condition below for your consideration:

Prior to the commencement date amended layout and landscape strategy plans shall be submitted for the approval of the Local Planning Authority which shall supersede the originally submitted plans (reference NEO00979_018I_C Figure 3.1b and 21190.101 – Fig 3.11 Rev G). The amended plans shall make the following specific provisions:

- I. An additional stand-off of not less than 20m shall be provided between the nearest solar arrays and the edge of the grade II listed Henley Deer Park.*
- II. The retained solar arrays located nearest to the Deer Park for a distance of 30m shall be reduced in height to a maximum of 2.4m.*

The development shall be implemented in accordance with the approved details.

Reason: To provide additional protection to the setting of the Grade II listed Deer Park which adjoins the northern margin of the permitted solar park development in accordance with SAMDev Policy MD13

I look forward to hearing from you.

Regards

Grahame

Grahame French
Principal Planner

Tel: 01743 258714; Mob: 07815 473271

www.shropshire.gov.uk/planning.nsf



From: Paul Barton <paul.barton@harrislamb.com>

Sent: 15 September 2023 13:42

To: Graham French <graham.french@shropshire.gov.uk>

Cc: James Stone <james@anglo-renewables.co.uk>

Subject: RE: FAO: Graham French; 22/05424/EIA - Proposed Solar Farm SE Of Rock Farm

Afternoon Grahame,

Further to your mail below, and my voicemail, I have spoken with Anglo Renewables and they agree to your suggestion.

We understand you will table a condition at committee which requires, prior to commencement of development a plan will be submitted and approved by the LPA, setting out a further 20m buffer between the hall and the site, and a further 4 rows to be lowered from 3.2m to 2.4m. (You will have noted that the panels run east to west so it may be better to phrase the condition a further c30/40m (the equivalent of 4 rows) will be lowered by). You will provide the precise wording.

Our heritage consultants will provide a note re HE's email below- we don't agree- but hopefully the above concession will assist.

We will also get a statement re community benefit, Anglo are committed to this. I will get chapter and verse to you asap, but it should be noted that if we go to appeal any community benefit will be simply be lost as you will know an Inspector will not agree this should be part of an UU or S106 agreement.

Let me know if you have any queries.

Paul Barton

Director

Item No.	Application No.	Originator:
5	22/05424/EIA – Rock Farm Solar	Bitterley Parish Council – Renewable Energy Objection

The community and Bitterley Parish Council are not against solar farms providing they meet planning requirements and the goals and objectives set out by the zero-carbon plan for Shropshire. This application **does not meet the goals and objectives set out by the zero-carbon plan as set out below**

With reference to Shropshire's zero carbon plan taken from the Shropshire Climate Change Task Force (SCCTF) Consultee response to this application (identified in italics)

Where?

'We actively support the community-led Shropshire Climate Action Partnership (SCAP) and have worked with them to commission the mapping of renewable energy potential in the county https://zerocarbonschropshire.org/renewable_energy_mapping_project/ and

they have identified where the opportunities arise for ground-mounted solar and wind farm development, with the aim of helping inform planning decisions to provide a strategic approach to energy development in Shropshire and to promote the development of the local energy industry

Summarising the climate consultee response to the application, the public would expect the application to be in the area of opportunity identified in the mapping of renewable energy potential. **Less than 25% of the proposed solar panel area is within the mapped area of opportunity** (see below).



Red area application area

Yellow/Green area – area identified within opportunity area suitable for solar

Demand

'Whilst we are planning for renewable energy self-sufficiency as an organisation by 2030, we also need to consider the increase in demand for energy we will experience between now and 2030. The Zero Carbon Shropshire Plan states "electricity demand will increase perhaps 60% due to charging EVs, and powering air and ground-source heat pumps. In addition, there is an opportunity for production of green hydrogen fuel for HGV / heavy agricultural use".

Summarising the climate consultee response to the application, the public would expect the application to produce the bulk of its output to satisfy the increase demand forecast in the plan. The demand increases highlighted by SCCTF will mainly occur in the following patterns

- i) Heat pumps- late autumn to early spring- midafternoon, night to early morning
This is not when solar PV farms generate so **the application adds little to providing solutions to peak demand and demand increase due to heat pumps**
- ii) EV charging- the grid has plenty of capacity in the traditional 'off peak hours- overnight.' Current thoughts on EV charging are to nudge demand into the 'off peak area of the grid' by tariff incentives that can already be seen in the market. The overnight time frame is not when solar farms generate power so **this application adds little to resolving the increase demand form EV charging**
- iii) Providing power for hydrogen manufacture to decarbonise the agricultural and heavy transport system **This application does not provide any capacity to do this within its plans**

BESS storage

Bitterley Parish Council believes the BESS (Battery Energy Storage System) has a separate connection to the grid and so does not take excess power from the solar farm but from the grid. In terms of significance the proposed BESS would keep the local grid powered for 10 minutes in winter. **The grid balancing offered by the BESS can be delivered without the solar farm.**

Capacity for energy security

*"Create a number of large-scale photo-voltaic arrays (solar farms, PV) and wind farms (wind and PV offer commercial opportunities at similar cost but have different site factors and a mix of, for example, 1/3 PV and 2/3 wind offers the opportunity to maintain better continuity of supply and balance grid loads)."*ⁱⁱ

Summarising the climate consultee response to the application, the public would expect the application to fall within the guidelines of the plan for 1/3 PV 2/3rds wind or other, to maintain better continuity of supply, balanced grid loads and energy security. This application does **not** meet these criteria.

The grid connecting Bishop Wood to Squirrel Lane has about 132 MW of connection capacity 1/3 of this would equate to 43MW of new connections being solar and 88MW other. There is already the equivalent of 52MW of planning applications granted and this application would take the figure to 92MW or 70%.

This additional capacity is clearly outside the policy and guidelines and will lead to grid imbalance and power shortages due to the low uptime of solar power – only 12% of available hours

Up to September 2023 Shropshire Council had little option but to promote solar farm applications as they were the only realistic high energy producing renewable option available to help meet the goals of the climate emergency due to the ban on onshore wind. In September 2023 the government changed its stance on onshore wind allowing a viable alternative to solar.

Onshore wind has a higher energy production density, allows agriculture under turbines and makes better use of scarce grid connections due to its up time of 25% v's Solar's 12%, in other words you get 100% more energy per connection per year using less food producing farm land plus there are other community benefits. A win win for all.

Therefore, we believe this application should be reused as there are now better more viable uses for the scarce connection that will help rebalance renewable energy production in line with the zero-carbon target of 1/3 solar and 2/3rds wind or other.

Connection constraint

The electricity distribution grid in Shropshire is heavily constrained and this means that opportunities to obtain a grid connection to allow power to be exported are very limited and are unlikely to improve. This significantly restricts where solar farms can be located, together with our ability to generate more renewable energy, which makes a crucial contribution to reducing carbon emissions and tackling climate change

Summarising the climate consultee response to the application, the public would expect the application to meet the requirement of Shropshire's zero-carbon plan and utilise constrained connections efficiently and within the guidelines of the plan

- **Another solar farm is not an efficient use of grid connections having an uptime of only 12% meaning 88% of the grid connection capacity is wasted or made less attractive to other generators wishing to connect to the grid**
- **The application needs to be viewed in line with the other applications for its cumulative effect on the grid and capacity usage (see above)**
- **It will not help meet the balanced capacity of 1/3 solar and 2/3 wind**
- **The current cumulative effect is an 'eggs all in one basket' approach to a plan that requires an energy mix to make the plan work and decarbonise Shropshire quickly.**
- **It's a bad use of limited connectivity.**

The application meets **none** of the requirements outlined in the Shropshire Council Climate Change Consultee response document.

Item No.	Application No.	Originator:
5	22/05424/EIA – Rock Farm Solar	Bitterley Parish Council – Heritage Objection

Bitterley Parish Council (BPC) would like to express our deep concern over the planning application 22/05424/EIA Rock Green solar and its proximity to the substantial heritages assets at Henley Hall to include Grade 2 listed assets of Henley Hall, Park House, stables and dovecote and Grade 2 registered Deer Park and Garden.

During consultation over the last 6 months Shropshire Council (SC) planning officers and the applicant have been asked by the community, both Ludford and Bitterley parish councils and the owners of Henley Hall to protect our heritage assets and move this solar farm from the west boundary of this historical site. This follows the previous application at Henley 1 in 2016 when a decision was made to create a buffer 300m from the Henley Hall boundary to protect these heritage assets from industrial development.

Statutory consultee, Historic England (HE) has stressed that their preferred action to protect the heritage assets is to move the solar arrays away from the Henley site. HE categorically state that planting trees as mitigation, proposed by the applicant, is, in their opinion, as damaging as having the solar farm built right up to the boundary of the grade 2 listed assets. HE pointed out in 2015 with reference to Henley 1 and again with this proposed application on the west side of this site that the view from the assets was important but equally important is the view of the assets in their setting which should not be compromised.

However the applicant and planning department have disregarded these recommendations in favour of maximising the solar farm and planners have not satisfyingly defended the total change in policy between the two applications. As late as 8th September Historic England wrote to the planning officer stressing the above recommendations. In response the SC planning officer wrote:

'Bitterley and Ludford Parish Councils have stated that the same 300m stand-off should apply as for the 2015 Henley 1 scheme which was approved on appeal. However, the context differs in that Henley 1 came forward under the feeding tariff subsidyscheme whereas the current development has to fund itself in the absence of subsidy. Significant reduction in the array footprint would potentially raise serious viability issues. Also, Henley 1 is due south of the park whereas the current scheme is due west. Additionally, the national context in which renewable energy is considered has evolved over the past 8 years and in 2018 Shropshire Council declared a climate emergency. Any stand-off precedent established by Henley 1 must be seen in this changed context.'

BPC would like to address the above claims.

Climate emergency

The declaration of a climate emergency does not absolve councils and applicants from their duty to protect the environment, heritage, historic and listed assets. In fact protecting the climate should go hand-in-hand with protecting the assets of our county. The fact that one solar farm was built before the climate emergency declaration and this application after the declaration is irrelevant.

Location

There is plenty of land in and around the development to move the arrays away from the setting of Henley Hall and Registered Deer Park and Gardens. The proposed development adjoins the registered deer park on the west side of the Henley site. Henley 1 solar farm is located to the south. In protecting the heritage assets and providing a buffer zone it is irrelevant whether the site is south or west. In fact the impact from the proposed Rock Farm solar arrays is potentially far greater on the west side.

FIT payments

The planning officer states Henley 1 was constructed under feed in tariffs or FIT payments while Rock Farm is self-funding the suggestion being that solar farm have become less profitable/viable. This is not the case. The feed in tariff system was

abolished by the government because subsidies were no longer necessary with the reduced cost of building solar and subsequent increase in profitability.
This can be found in the dept BEIS published figures for solar farm projected construction costs, hurdle rates and profitability clearly showing there was no need for solar under the FIT system. The government then introduced contracts of difference.
 Shropshire Council has seen plenty of planning applications for solar since the end of the FIT system clearly realistic profits can be made. So the fact Henley 1 was built with FIT subsidies and Rock Farm solar is self-funded has no basis or justification to jeopardise the setting of historical assets.

We are therefore asking the committee members to think seriously about the precedent set in 2016 to the protect these heritage assets and ask whether the same protection should not be afforded these same assets in 2023 as requested by Historic England and the community.

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Bitterley Parish Council has pointed out that not all of the current application site is included in the area deemed suitable for solar farm development in the opportunity mapping exercise by Zero Carbon Shropshire which Shropshire Council is a partner organisation of.

This matter was also raised by the Parish Council at the recent appeal hearing into a nearby solar scheme at Letwyche, attended by the Parish Council, which was allowed on 7 July 23. It should be noted that the Inspector concluded that less weight could be given to the project conclusions as there had been no formal public / stakeholder consultation process.

The Zero Carbon Shropshire exercise was a broad-brush study. One of the key input parameters was provisional agricultural land quality mapping by DEFRA which did not subdivide grade 3a (best and most versatile) and poorer quality grade 3b land. Land mapped as Grade 3 on the provisional DEFRA survey was excluded from the identified solar opportunity areas on the basis that it may potentially include some best and most versatile quality land.

The current applicant has been able to provide more detailed land quality mapping which confirms that the excluded land is overwhelmingly grade 3b and is therefore not of best and most versatile quality. Had this been known at the time of the Zero Carbon Shropshire study it is considered likely that the majority of the application site would have been included within the identified solar opportunity area.

It can be seen that the yellow colour on the map provided above by the Parish Council goes right up to the boundary of the listed deer park and includes land within the deer park area. Hence, it is evident that the presence of the deer park was not taken into account by the study as a constraint to solar development.

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Addendum

Contrary to Page 1 and section 5 of the committee report the application site falls within the area of Ludford Parish Council and adjoins Bitterley Parish Council to the east.

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5	22/05424/EIA – Rock Farm Solar	Agent response to Bitterley Parish Council

Further to the receipt of comments from Bitterley Parish Council (undated) we note the Council has objected under four headings: ‘Where’; ‘Demand’; ‘Capacity for Energy Security’; and ‘Connection Constraint’. We respond as follows using the Parish Council’s headings:

Where

The Parish Council point to the mapping undertaken by Shropshire Climate Action Partnership, and set out that only 25% of the proposed development is identified as being appropriate for solar use. You will know the mapping relied on Natural England’s Agricultural Land Classification assessment, as one of the criteria when identifying potential sites. You will know Natural England’s mapping is very broad brush and should not be expected to deliver site specific detail when assessing the classification of land, which could vary within a field. This is particularly important as Natural England’s mapping does not differentiate between 3a and 3b, which was a key part of Shropshire Climate Action Partnership mapping assessment.

The applicant has submitted its own Agricultural Land Classification Report, which found the vast majority of the site to 3b, and had Shropshire Climate Action Partnership had this information to model into its mapping almost all of the site would have also been considered a suitable opportunity for solar schemes.

The above is not our view, this was confirmed in the recent allowed appeal at land to the East of Squirrel Lane, (APP/L3245/W/23/3314982), primarily at paragraph 8. The Inspector also stated,

“The weight that the site possibilities map attracts is also limited by the fact that the document was not subject to formal public consultation other than a Webinar”. (Para 8)

The mapping is a well-intentioned piece of work, which unfortunately lacks the detail or public involvement to allow it to stand up to scrutiny, but it is of note that the mapping system also identifies the application site for “very large scale wind assessment Phase 1 unconstrained land” which is discussed below.

Demand

The Parish Council are incorrect when they state different Grid Connections have been obtained for the BESS and the Solar Farm. Both the BESS and the Solar Farm will be included in the same Grid Connection. The site includes battery energy storage to allow electricity generation (including the Solar Farm generation) to be stored on site and released to the grid at times of peak demand, thus balancing the grid network.

The Distribution Network Operator and transmission operator are also adding significant volumes of standalone battery energy storage across their networks so power generated from renewable sources can be stored when generation is high and demand is low, and released when demand is higher. An example of this is located adjacent to the proposed site and currently charges and discharges its power from the Ludlow grid. The network needs both generation and storage and these do not have to be located together as power is moved around the country to where it is needed at that time.

Capacity for Energy Security

The Parish Council points to the recent change in the NPPF (September 2023) as a reason to refuse the application, and allow Shropshire Council to assess onshore wind developments which it considers a better source of renewable energy. There are a few points to make here.

1. The recent changes to the NPPF will not make it easier for wind developments. Such projects still require the support of the local community as set out in footnote 54, which as we know will be difficult to obtain, and was the reason the Government in effect placed moratorium on such developments since 2015.
2. Footnote 54 also states that planning permission can only be granted if, "following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support". As we set out above the Shropshire Climate Action Partnership mapping system has not been through significant public consultation therefore any identified locations will need further public consultation.
3. The application site is identified for a potential wind opportunity however we suspect neither Historic England, the AONB or the Parish Council will support the mapping system's findings.
4. Finally, and most significantly, whether renewable energy is secured by Solar, Wind or any other source, it will still require a Grid Connection. Grid connections are scarce and are the primary restriction to the UK rolling out a system of clean energy. Anglo Renewables have secured a grid connection offer here which can be connected without delays and this should not be underemphasised. This has been recognised in various determinations and at we enclose two appeals in Basingstoke and Deane and Durham CC where the weight given to grid connections were "substantial" and "significant", references at paragraphs 22 and 30 of each appeal respectively.

Connection Constraint

The Parish Council have misunderstood how Grid Connections work. As set out above the Grid Connections offers are for a specific point of connection, in this case Ludlow Substation. When the Distribution Network Operator issues a connection offer they consider the generation profile of the application technology and model the network accordingly. This means their operating model does not block out the 40MW of capacity on the network 24 hours a day, only when that technology is generating. Further in the case of solar this is very predictable. The remaining capacity can be assigned to other technologies such as wind.

The Distribution Network Operator actively manages their network to ensure it is efficient and maximises the use of their assets. Significant work has been done to allow greater volumes of power to be exported on to the network and the Distribution Network Operators have achieved, this as significant volumes of distributed renewables have been added to the network without reinforcement. More capacity has been connected without significant new infrastructure being built. This scheme can be connected without significant infrastructure upgrades.

In addition, the Parish Council's energy security assessment is fundamentally flawed. The grid doesn't have 132mw of capacity at Ludlow, that is the rating of the feeding lines at 132,000 volts.

I trust this answers all of the issues raised by the Parish Council however should you have any queries please let me know.

Yours sincerely
Paul Barton MRTPI
Director

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Community Benefit Statement

Anglo Renewables is committed to honouring the Community benefit fund of £80,000 which will be made available to the local community upon commissioning of the solar farm. We have contacted both Parishes and provided confirmation of the fund in writing committing the project to this payment. The mechanism for dispersal of the funds can follow two routes, which are set out below. This would be established once a construction start date for the project has been confirmed.

1. In Partnership with the Parish Councils. Anglo Renewables is committed to working closely with the Parish Councils to define the terms of the community benefit and identify projects it will support. We will initiate this process through a dedicated meeting after the determination of the Planning Application. Subsequently, a collaborative working group, consisting of a representative from both Parish Councils and Anglo Renewables, will be established to jointly determine the parameters of the community benefit fund. This group will address essential aspects, including funding allocation, project criteria, and reporting mechanisms, ensuring transparency and alignment with community needs.

2. Through a local grant giving organisation. If the Parish Councils do not wish to partner with the Applicant in the allocation of funding we will work with a local grant giving organisation (e.g. The Shropshire Community Foundation) to ensure the distribution of funds to local groups and sustainable causes in keeping with the values of Anglo Renewables.

Discussions have taken place outside of the formal planning process as community benefits are not material planning considerations. It is acknowledged that the intention to make such contribution will not be a factor that should be taken into account by the Council in considering whether planning permission should be granted.

The scheme was developed prior to the Shropshire guidance being issued and as such when we had board approval to proceed, the guidance could not be considered. The level of funding is consistent with the funds we have offered on our other solar developments across the country.

The value of funds offered considers the whole operating model of the project, including construction costs, grid connection costs, site specific yield modelling, one off development costs, rents, business rates, etc. The connection here as it 132kv, the highest of the distribution connection voltages, and also the most expensive.

The development of the project is a significant expenditure which will offer wider community benefits of decarbonising the electricity network, tackling climate change and increasing energy security. This site has a very large Biodiversity Net Gain, well in excess of the required 10% and this will offer significant wider public benefit for the life of the project, along with large areas of hedge and tree planting which will remain after decommissioning for long term gain.

Alongside this the project will pay significant business rates over its lifetime to fund public services. Construction and operation will also have local business benefits through use of local suppliers and contractors, and use of local services, bringing money into the local economy.

Overall, the project supports the Council's climate emergency and aims of a carbon neutral Shropshire economy, alongside supporting biodiversity and the local economy.

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