

Our ref: Oaklands Solar Farm

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

SUBMITTED ONLINE ONLY

06 August 2024

Dear Sir,

Application by Oaklands Farm Solar Limited for an Order Granting Development Consent for Oaklands Farm Solar Park

The National Forest Company

The National Forest Company (NFC) is responsible for leading the creation of the National Forest – 200 square miles of the Midlands, spanning parts of Derbyshire, Leicestershire and Staffordshire. The NFC was established in 1995 and is a charity and non-profit institution, as well as being an Arm's Length Body of the Department for Environment, Food and Rural Affairs (Defra). The National Forest Strategy 2024-24 is endorsed by Government and sets out the approach for the creation and management of the Forest over the next phase of its development. More than 9.5 million trees have been planted to date creating over 8,000ha of new habitats, transforming what was once one of the least wooded areas of the country. Around 25% of this has been delivered through Forest creation as part of new development.

The National Forest and Solar Energy

The NFC acknowledges the importance of the generation of solar energy in enabling the transition to a low carbon economy but wish to ensure that the interests of the National Forest are protected and enhanced as a result of the proposal. Extensive further tree planting is anticipated across the Forest, including the area of the proposed solar farm to achieve the Government-endorsed aim of 33% Forest cover (from an original 6%). A development of this scale reduces tree planting opportunities in this area of the Forest and has the real potential to form a barrier to future Forest habitat connectivity.

Planning Policy and the National Forest

Paragraph 151 of the National Planning Policy Framework (NPPF) acknowledges the valuable opportunities the National Forest offers *'for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife'* and advises that the National Forest may be a material consideration in preparing development plans and deciding planning applications. In conformity with this, Policy INF8 (The National Forest) of the South Derbyshire Local Plan, expects development within the National Forest to deliver the National Forest Strategy and contribute towards the creation of the Forest in accordance with National Forest Planting Guidelines. Unlike other forms of development which are expected by policy INF8 to include either 20% or 30% of the site area as Forest-habitats, solar farms do not explicitly feature as a

development type within the National Forest Planting Guidelines. Notwithstanding this, the NFC anticipates that a development of this scale should include areas of significant woodland planting and other habitat creation as a contribution towards the creation of the National Forest. This would have significant benefits in terms of ecological improvements, woodland habitat connectivity, landscape character and minimising visual impact.

Policy INF8 also requires that within the National Forest, that the siting and scale of the new development is appropriately related to its setting within the Forest, and that the proposed development respects and does not adversely affect the character and appearance of the wider countryside. The NFC considers that the most appropriate way to ensure a solar farm development complies with this element of the Policy, is by a landscaping scheme which recognises and responds to the National Forest location.

National Forest planting and Biodiversity Net Gain

This proposal is required to comply with the requirement for National Forest planting in policy INF8 and demonstrate a biodiversity net gain. It may be possible for habitat creation to count towards both National Forest policy requirements and net gain requirements, such as on-site tree and woodland planting, but applicants will need to demonstrate that both policy requirements have been met. Demonstrating a net gain does not imply compliance with National Forest policies nor should a net gain be accepted instead of meeting the National Forest policy requirements.

The Illustrative Landscape Strategy Plan

The importance of habitat connectivity and a locally distinctive landscape strategy has been consistently discussed with the applicant, and it is therefore disappointing that the landscape strategy is not specific to the site's National Forest location.

While we appreciate that the landscape strategy plan is illustrative, it does not include any significant areas of woodland planting. At this indicative stage, the NFC would anticipate significant woodland blocks being proposed which maximise habitat connectivity between the existing woodland blocks surrounding the solar farm (including Rosliston Forestry Centre, Redferns Wood and Thompsons Wood) which were funded by the NFC in the last 30 years as part of the National Forest. We would also expect that there would be reference to the National Forest and habitat connectivity in the target notes of the Illustrative landscape strategy plan, particularly given our previous discussions with the applicant.

In terms of woodland creation, the landscape strategy plan shows small areas of 'woodland trees and woodland understorey' shoehorned around solar panels and predominately to the edges of the development. This is of concern noting the annotation on the Landscape Strategy Plan that 'trees around the edges of solar arrays should not exceed 8-10m in height at maturity to avoid shading of solar PPV panels.' While this will create useful habitat, this shrubby thicket needs to be in addition to woodland planting with a high proportion of tree species designed to create a woodland canopy.

It is not clear from the plan where woodland is proposed as opposed to woodland understorey or indeed whether they are a separate planting type. It is also noted that the Outline Landscape and Ecological Management Plan only refers to 'woodland understorey creation and tree planting' in the design approach, with no reference to woodland creation.

In trying to understand which landscaping elements could contribute to National Forest planting, we note that Table 3.7 in Appendix 6.1 – Biodiversity Net Gain Report details that 5.51ha of woodland is being created on the site, 0.71ha of mixed scrub and 3.48ha of urban trees. This represents tree

planting on a very small percentage of the site. While we accept that solar farms are not explicitly referred to as a development type in the planting guidelines of Policy INF8, a development of this scale reduces tree planting opportunities in this area of the Forest and has the real potential to form a barrier to future forest habitat connectivity. We have consistently advised the applicant that the landscape strategy should include significantly more large blocks of woodland. These woodland blocks and tree planting should be to the north of the panels or remote from them to avoid the conflict between tree planting and shading. While we are pleased to note the retention of existing landscape features, we consider that opportunities to connect these features as opposed to being isolated and/or surrounded with panels, should be taken.

Priority mapping

Noting the potential conflict between tree planting and solar panels, it is important that proposed tree planting is located where it can have the greatest impact. The NFC has developed a unique priority mapping system that helps us to highlight the potential benefits of planting of any given field parcel within the Forest. This priority mapping is built around the idea of creating a “Public Benefit Index” for land in the Forest. It goes much further than just ecological monitoring, taking into account benefits for society as well. This allows the NFC to identify where the greatest benefits to planting a site exist.

Using the reference numbers on ‘Figure 4.2: Work Area No 1 – Solar array reference numbers’, our priority mapping system has highlighted areas Nos. 07, 08, 022 and 023 as having the highest benefit. Additionally, the area to the north-east of area No. 023 (where the Landscape Strategy details that watercourse trees will be planted along the Pessall Brook) and the field to the north-east of area No. 020 where the National Forest Way passes through also rate highly on the priority mapping system – see map appended to response.

National Forest Way

We are pleased that the National Forest Way, a 75-mile long-distance walking trail through the transformed landscape of the National Forest, has been identified. We suggested that a wide green corridor along this long-distance path would be our preferred approach and it is considered that this could be improved with some changes to the landscaping strategy. We are pleased that our suggestion of an information panel to provide information about the solar farm to users of the footpath has been incorporated into the landscape strategy.

Conclusion

A development of this scale should recognise and acknowledge the site’s location by making a significant contribution to the creation of the National Forest. To comply with the NPPF, The National Forest Strategy and Policy INF8 of the Local Plan, the NFC considers the illustrative landscape strategy should be amended to deliver significantly more woodland planting and ensure that the proposal does not form a barrier to habitat connectivity. Tree planting should be allowed to realise its potential rather than being restricted by the conflict between shading and the solar panels and should be located in areas where the planting offers the highest benefits to both nature and people.

Yours faithfully












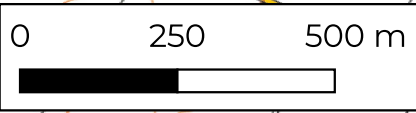
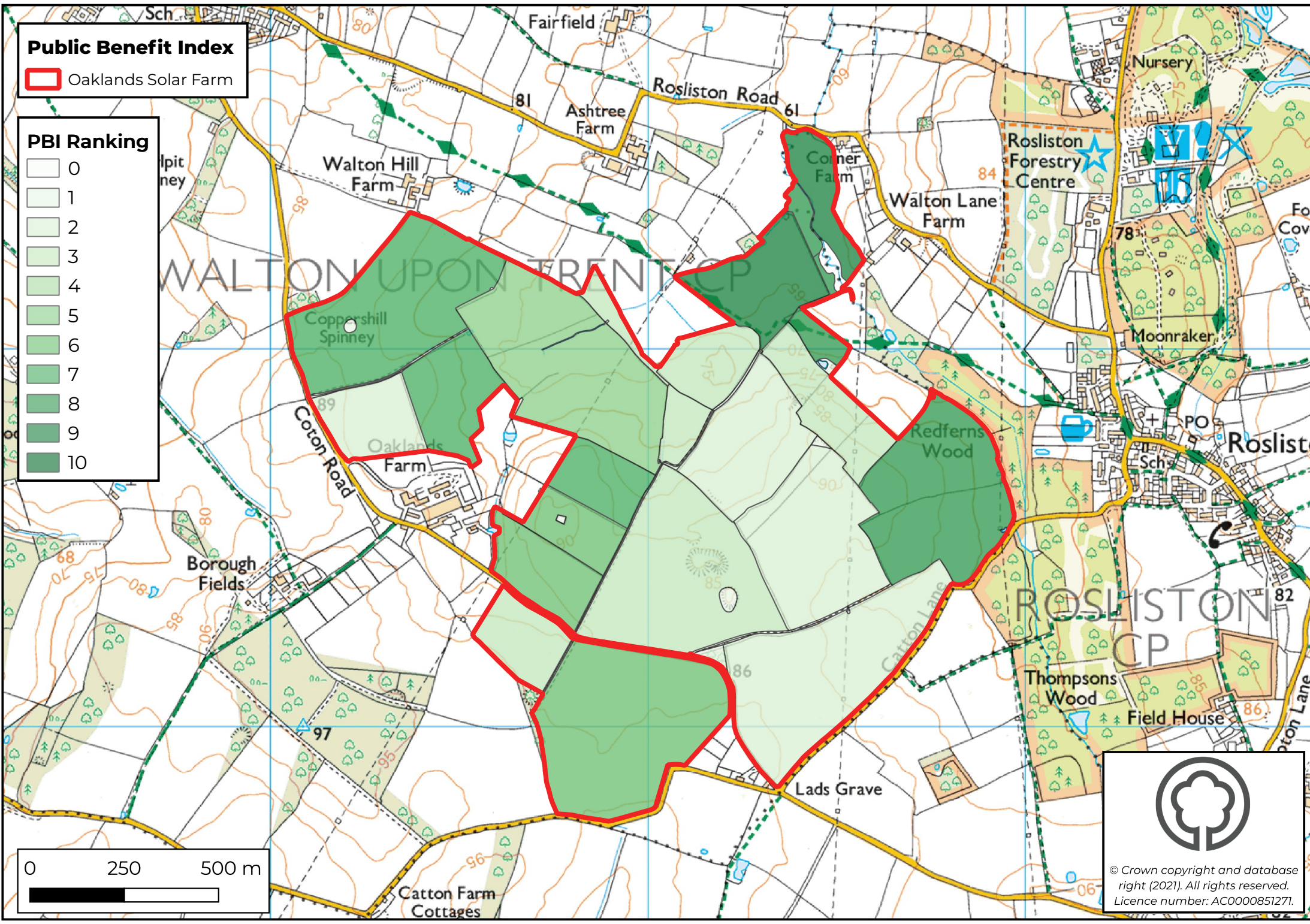
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Public Benefit Index

 Oaklands Solar Farm

PBI Ranking

-  0
-  1
-  2
-  3
-  4
-  5
-  6
-  7
-  8
-  9
-  10



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