

Planning Statement

Installation of Ground Mounted Solar PV

City Football Academy, Ashton New Road, Manchester

Introduction

This Planning Statement has been prepared to accompany a full planning application for the installation of ground mounted photovoltaic solar panels at the City Football Academy (CFA), Ashton New Road, Manchester.

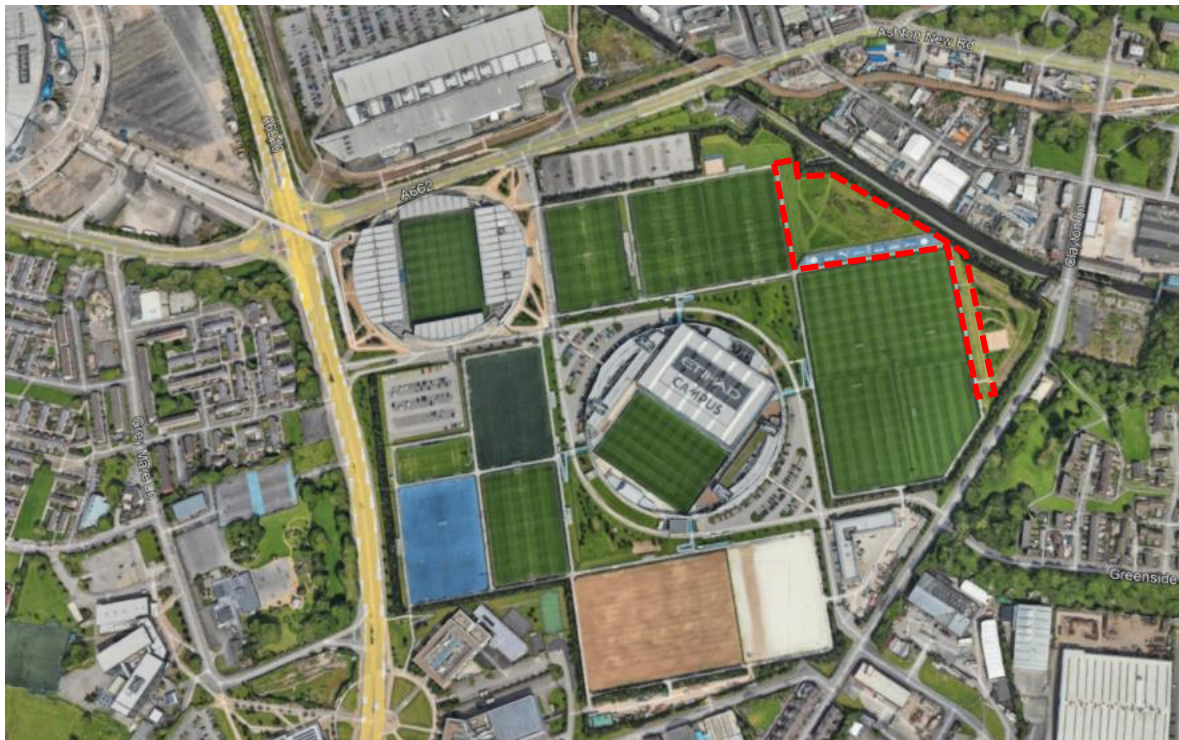
The purpose of this statement is to assess the proposals in the context of the adopted Development Plan in force for the area and other material considerations and should be read in conjunction with the following information that forms the planning application submission:

- Application Forms & Certificate;
- Location Plan;
- Existing Plan;
- Proposed Site Plan;
- Proposed Plan – Embankment A1, B1 & Ground C1;
- Proposed Plan – Embankment D1 & Ground D2;
- Solar Panel Specification;
- Biodiversity Net Gain Metric

Site Location & Context

The application site forms part of the wider part of the Etihad Campus, which includes the Etihad Stadium, Manchester Regional Arena, City Football Academy and the National Squash Centre,

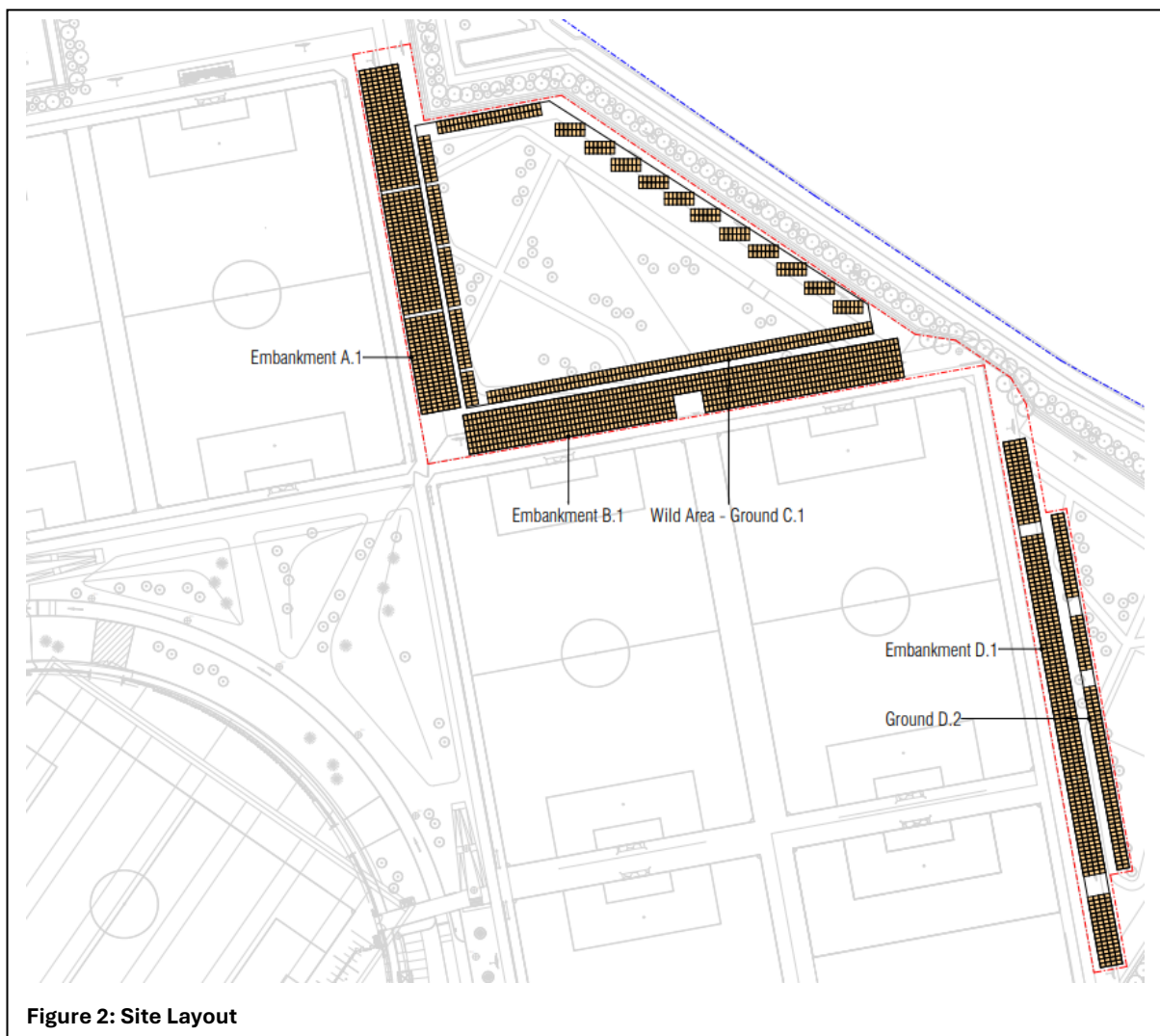
with the area having been a key focus for regeneration since being used to host the Commonwealth Games in 2002.



The City Football Academy (CFA) lies to the south eastern edge of the wider Etihad Campus and opened in December 2014 following the comprehensive regeneration of the 80 acre former Clayton Aniline site. The CFA provides a state-of-the-art training facility shared by Manchester City's first team, women's team and academy teams, as well as the world headquarters of the City Football Group and boasts the 7,000 seater Joie Stadium; grass and artificial pitches; the largest indoor pitch in the UK; a media centre; player welfare and gym facilities and other football operations facilities.

Development Proposals

The current application is seeking full planning permission for the installation of ground mounted solar panels to existing embankments and undeveloped areas lying towards the eastern boundary of the wider CFA complex, as illustrated overleaf (Figure 2):



Earlier in the year, a prior notification application for the installation of roof mounted photovoltaic solar panels on a number of buildings and structures within the Etihad Campus, including the Joie Stadium, Performance Centre and FM / Laundry Buildings (LPA Ref. 139535/P14J/2024) was submitted to the LPA. The Decision Notice issued on 26th April 2024 confirmed that the proposals raised no adverse issues in respect of external appearance, glare or the general visual amenity of the area and, accordingly, consent was granted with works currently ongoing on site.

The Etihad Campus has high levels of energy consumption and the application proposals, alongside the recently approved proposals, will help to contribute to Manchester City's overarching sustainability and environmental impact goals, as well as supporting a greater

degree of energy independence / security by reducing reliance on the National Grid and securing associated reductions in carbon emissions.

Planning Policy Context

Development Plan

Manchester Core Strategy 2012-2027

The following policies of the adopted Core Strategy are of relevance to the assessment of the application proposals:

- Policy SP1: Spatial Principles;
- Policy EN4: Reducing CO₂ Emissions By Enabling Low & Zero Carbon Development;
- Policy EN5: Strategic Areas for Low & Zero Carbon Development;
- Policy EN7: Energy Infrastructure Opportunities;
- Policy EN15: Biodiversity & Geological Conservation;
- Policy DM1: Development Management

Places for Everyone Joint Development Plan for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 to 2039

The following policies of Places for Everyone are considered to be of relevance to the assessment of the current application proposals:

- Policy JP-S1: Sustainable Development;
- Policy JP-S2: Carbon and Energy;
- Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity;
- Policy JP-P1 Sustainable Places

Material Considerations

National Planning Policy Framework

The revised NPPF was published in December 2023 and sets out the Government's planning policies for England and how these are expected to be applied.

The NPPF confirms that the purpose of the planning system is to contribute towards the achievement of sustainable development and, in order to achieve this purpose, the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

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

The NPPF confirms that at its heart is a presumption in favour of sustainable development, which for decision-taking means:

- approving development proposals that accord with the development plan without delay; or

- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’

The specific policy areas of the NPPF will be referred to, as appropriate, throughout this statement.

Planning Assessment

Having regard to the adopted Development Plan in force for the area and other material considerations, namely the NPPF, the key planning considerations in assessing the current application proposals are as follows:

- Principle of Development;
- Visual Impact;
- Biodiversity

Principle of Development

The recently adopted Places for Everyone confirms that Greater Manchester's Vision is to be at the forefront of action on climate change and to make its fair contribution to international commitments by becoming a carbon neutral city region by 2038. In acknowledgment of climate change, by 2020, all 10 districts and the Greater Manchester Combined Authority have declared a climate emergency. To support this vision a 5 Year Environment Plan was launched in 2019 to identify the urgent actions that are needed to ensure Greater Manchester can follow the required pathway for carbon neutrality.

Places for Everyone states in order to meet stated carbon commitments Greater Manchester will need to:

- Be carbon neutral by 2038;
- Hold cumulative carbon dioxide emissions to within the stated carbon budget;
- Initiate a programme of mitigation to reduce emissions including by:
 - **Significantly upscaling solar photovoltaic energy;**
 - Reducing heat demand in homes;
 - Moving away from carbon intensive gas as the primary source of heat;
 - Reducing heating and cooling demand for public and commercial buildings;
 - Increasing biofuel use;
 - Enable sustainable choices for travel and decarbonise transport;
 - Significantly upscaling building retrofit; and
 - Increase the delivery of nature-based solutions and biodiversity net gain

Policy JP-S2 therefore confirms that a positive approach will be taken to renewable and low carbon energy schemes and this approach is consistent with the relevant policies of the adopted Manchester Core Strategy, which confirm that there will be a general presumption in favour of low and zero carbon decentralised energy schemes.

The current application proposals involve the installation of 2,630 ground mounted PV modules with a capacity of 1.12 MW, which, combined with the solar panels previously approved for the wider site, will help to deliver significant CO₂ savings. The Etihad Campus has high levels of energy consumption and the application proposals will help to contribute to Manchester City's overarching sustainability and environmental impact goals, as well as supporting a greater degree of energy independence / security by reducing reliance on the National Grid and securing associated reductions in carbon emissions.

'Game Plan 2023: Manchester City's Sustainability & Environmental Report' affirms that sustainability is core to the club's business operations, development, events and community and outlines MCFC's ambitious target of achieving net zero by 2030, which is the lynch pin of the

club's sustainability agenda. Game Plan 2023 identifies that the club remains on course to achieve this target and, in the past two decades, they have already made significant progress by:

- Reduced energy consumption – saving up to 2m kwh since 2019;
- Chosen only renewable electricity;
- Reduced waste and forbidden landfill;
- Eradicated single use plastics and eliminating PET;
- Created a new urban forest in East Manchester;
- Provided significant local employment opportunities;
- Implemented a sustainable, local procurement process;
- Harvested over 1bn litres of Manchester's rainwater.

Manchester City are fully committed to being a sustainable organisation and, accordingly, since 2012 have utilised the DERFA (GHG) protocol for its emissions impact measurement and reporting. The continuous use of the protocol ensures that the club can benchmark its actions and results year-on-year with the credibility of the protocol in place. The club measures all its actions and operations, and, in 2022, introduced a measure for embodied carbon, including retrospective measurement for existing properties and their respective development. Although working towards their own goals, Manchester City have also remained closely aligned to key local, national and global objectives, from the UN Sustainable Development Goals to Manchester's own ambition for net zero city by 2038 with active membership of the Manchester Climate Change Partnership and the British Association of Sustainability in Sport (BASIS).

In 2022-2023 Manchester City used 13.034m kwh of electricity, which is a reduction of over 1.1m kwh in the year and procure 100% renewable energy. The current proposals will enable the club to generate electricity using renewables sources that will meet part of their energy consumption requirements through the proposed ground mounted solar PV equipment in line with their overarching objective to achieve Net Zero, as well as providing a greater degree of energy independence / security.

The current application proposals would therefore positively align with established policy objectives aimed at meeting the challenge of climate change, as well as Manchester City

Football Club's own sustainability agenda which is at the forefront of their operation and are therefore entirely acceptable in principle.

Visual Impact

Policy DM1 of the adopted Core Strategy sets out a number of general development management considerations, which, alongside other relevant development management policies, seek to ensure that development proposals have regard to impact on the surrounding areas in terms of the design, scale and appearance of the proposed development.

The application site lies towards the eastern edge of the CFA complex and the level of visual containment afforded by the size, layout and boundary treatments of the site will ensure that the proposed equipment does not give rise to unacceptable impacts on visual amenity or neighbouring occupiers, as well as ensuring that the proposed ground mounted solar PV does not lead to unacceptable impacts in terms of glint and glare. This position is supported by the findings of the submitted Solar Glare Hazard Analysis produced by Greencat Renewables in relation to the previous prior notification application for roof mounted solar panels within the Etihad Campus (ref: 139535/P14J/2024), which did not identify any unacceptable impacts in relation to glint and glare, as accepted by the LPA in assessing the application. The previous assessment has not been updated for the purposes of the current submission, however, in view of the ground mounting of the solar PV within the CFA complex, it is considered that the previous findings can be applied equally to the current proposals.

On this basis, it is evident that the proposals would not give rise to unacceptable impacts in relation to visual amenity or impacts on other nearby occupiers or receptors. The proposals can therefore be seen to accord with relevant Development Plan policies in this regard.

Biodiversity

Policy JP-G8 of Places for Everyone confirms that a net enhancement of biodiversity resources will be sought and, furthermore, Biodiversity Net Gain has been brought in to ensure that habitats for wildlife are left in a measurably better state than they were before the development. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as

inserted by Schedule 14 of the Environment Act 2021) and developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

The current application is therefore accompanied by a complete Biodiversity Net Gain metric and, subject to the imposition of the standard biodiversity net gain condition, the application proposals will meet the mandatory 10% net gain requirement.

Moreover, Manchester City's landscape and biodiversity operations are award-winning, with initiatives such as creating bespoke targeted habitats and detailed species monitoring. The club are making continual efforts to challenge current maintenance practices to a more ecologically beneficial horticultural approach. A recent BALI recognition for ecological and biodiversity enhancement has been achieved for the site. The ground-mounted solar array project will not only continue but further enhance this ongoing work targeting invertebrates and other creatures that the applicant is seeking to increase for the area. By integrating renewable energy with carefully planned biodiversity efforts, the initiative will serve as another key element in the club's long-term strategy to promote sustainability and environmental stewardship.

The application proposals will therefore meet statutory and established policy requirements to deliver biodiversity enhancements.

Conclusions

The current proposals involve the installation of ground mounted solar PV equipment within the CFA complex to support Manchester City's overarching sustainability goals and target of achieving Net Zero by 2030. The proposals would evidently positively align with established policy objectives aimed at meeting the challenge of climate change and it has also been clearly demonstrated that the proposals will deliver biodiversity net gain and would not lead to unacceptable impacts in relation to visual amenity or impacts on other nearby occupiers or receptors.



The application proposals represent an entirely acceptable form of development having regard to the provisions of the adopted Development Plan in force for the area and we would therefore respectfully request that the LPA resolve to grant planning permission at the earliest opportunity.