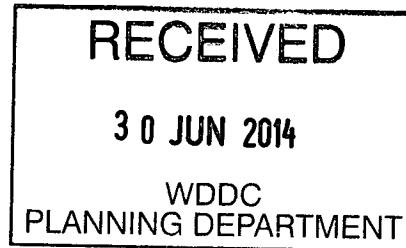


Our Ref: DE/74789

Your Ref: 1/D/12/001664

27 June 2014



Planning Department  
West Dorset District Council  
South Walks House  
South Walks Road  
Dorchester  
Dorset  
DT1 1UZ

For the attention of Andrew Martin

Dear Sir/Madam,

**HIGHER HILL FARM PARTNERSHIP  
CONSTRUCTION OF CIRCA 24MW PHOTOVOLTAIC SOLAR PARK FOLLOWING DEMOLITION OF  
34 EXISTING MASTS, RAMPISHAM DOWN, MAIDEN NEWTON, DORSET, DT2 0HS**

I refer to the above, my previous letters dated 25<sup>th</sup> September 2013 and 22 April 2014 and your email dated 18<sup>th</sup> February 2014 in which you requested clarification on a number of points. This letter enclosed further supporting information and deals with your email issues chronologically. It does not however repeat previous supporting information or the contents of the submitted Environmental Statement (unless specifically stated). The application therefore needs to be considered in the round.

As you are aware my client has set up a monitoring/test array at the site to evaluate the shading effects of the panels proposed over part of the site and the first results of this are now available. With this letter I enclose the following and would be pleased if this information could be considered as supporting to the planning application and in so far as the ES Chapter is concerned a formal amendment to the ES Chapter. For administrative reasons some of the supporting documents are repeated as Appendices to the ES Chapter:-

- Light Level Monitoring - CH&P 25 June 2014
- Technical Assessment - Dr J Feltwell (with a Forward by Sir Iain Prance) 26 June 2014
- Shadowcast Timelapse 19 June 2014 (submitted separately by post)
- Report into Enhancement Opportunities – Ilex Ecology (with an Appendix by S Holloway of SLR Consulting)
- Revised ES Chapter 8 (Ecology) and associated Appendices and Figures. NB: specifically note Appendices 8.9, 8.13 and 8.14b, which contain information not previously seen by the LPA.

The only substantive issues remaining in respect of this application relates to the NE assumption that the grassland that justifies notification of the site as an SSSI will be adversely effected and if so whether the benefits of the development clearly outweigh the impacts (Framework para 118). Planning Practice Guidance requires LPAs to take a pragmatic approach and where significant harm cannot be avoided consideration needs to be given to potential mitigation through, in this case, revised panel design and the management of the whole application site (Natural Environment, 2). It is therefore the applicants position that a balance is required both by Natural England, when

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formulating their final response, and by the LPA in considering their response and the application overall.

The information submitted demonstrates that there is unlikely to be any adverse impact on the grassland under the panels that cover part of the site. Only 23% of the site is affected by shading at all and none of the site is shaded a 100% of the time (Shading Analysis of Rampisham Solar Park BSRL 17 June 2013).

The ecology study currently running has produced sound scientific results and initial ecology conclusions. Trends can also be accurately predicted and the overarching conclusion is that the grass under the panels is not adversely affected. However, if Natural England are not prepared to accept this conclusion at all or just at this stage then it is the applicants view that any actual or likely adverse impact is "mitigated", via the agreed Management Plan over the 77% of the site not affected by shading at all. In any event the development is temporary and wholly reversible. The applicant and BSRL response in proposing a wholly new panel array and panel design and the setting up of the ecology study alongside the agreed management plan, is as required, a pragmatic and positive approach to the issue identified and is a key matter when the merits of the application are considered.

This is of course only one of the balancing exercises that need to be undertaken. While ecology is the only, but nevertheless important, issue sight must not be lost of the fact that this is a non-agricultural pdl site, where Government policy has now focused solar park developments; that "need" cannot be questioned and where the renewable energy and socio-economic benefits are acknowledged as "substantial".

I do not repeat the "Dorset" targets for renewable energy here as this information is contained within the ES but it is relevant to reiterate that a National target of 15% renewable generation by 2020 is transposed into the Dorset, Bournemouth, Poole strategy as an initial 7.5% target. It is clear that to reach this target a significant increase in the provision of power by renewable sources will be required. It is also acknowledged that large scale solar parks are required if targets are to be met (see the Bournemouth, Dorset and Poole Renewable Energy Strategy to 2020 (January 2013)) and the RegeSW Renewable Resource Assessment (March 2012).

I now turn to the other issues

#### **Compensation**

The offer of Compensation referred to in my letter dated 25<sup>th</sup> September is Withdrawn.

#### **Land to the North**

As you are aware a request to NE has been made for Discretionary Advice in respect to land to the north of the A356 and its ability to accommodate a solar park. The submission has been supported by a Landscape and Visual Assessment and an Ecological Site Appraisal. Whilst the site is located within an AONB, in landscape terms it is relatively discreet and the proposed development can be satisfactorily accommodated in the landscape, subject to the sensitive siting of the panel arrays; the maintenance and management of existing boundary hedgerows and positively planned additional landscaping. John Stobart of NE reported verbally at a meeting held on the 4 June 2014 that the site was suitable for solar park development albeit subject to a long list of caveats. We have not pressed John for NE formal comments at this time while our negotiations on the application site continue.

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One important point is that the applicant does not consider that this site is an alternative to the application site but as potential compensation for the development lost (circa 16MW) and as a compromise position helping to facilitate the agreed grassland management of the application site.

#### **Clarification on Homes to be Powered and CO2 Savings**

When the planning application was revised it was envisaged that the proposals would result in an output of 24.35MW which would produce enough power to power 7,541 homes with a carbon saving of 269,625 tonnes over 25 years. However, since making the application PV technology has improved with solar panels now having the capacity to produce 270W plus per panel whereas previously this would have been approximately 230W per panel.

As a result of these improvements the proposal would now generate enough electricity to power 10,180 homes with a carbon saving of 364,000 tonnes over a 25 year timeframe. It is this more up to date information which was referenced in the A5 leaflet. I apologise for any confusion and confirm that the A5 leaflet was submitted only as supporting information and is not intended to be a formal part of the application. Nevertheless, the benefits of renewable energy are unquestioned and a significant material consideration to be weighed in the balance.

#### **Existing Infrastructure**

Whilst the remaining masts hold scrap value, should the application be refused planning permission then they would remain in situ regardless of their value. However, in economic terms the estimates of value and cost are set out in my email to John Stobart, copied to you, dated 11 April 2014. John advises that the applicants assumptions in respect of demolition methodology was set out in this email was somewhat exaggerated but we have received no further direct guidance from him. The methodology set out in the Environmental Statement (Chapter 12) was worked up in discussion with NE and sets out that the towers will be pulled over onto dry grass and then cut up. Pending any further guidance this remains the working assumption in terms of methodology for the removal of the remaining towers, which we also assume will be the subject of specific planning conditions or controls formally agreed via the SSSI process. Notwithstanding the methodology query the issue is about the size of the loss rather than any argument that a profit can be secured that makes the demolition of the towers a viable proposition in its own right. Therefore the demolition of the remaining towers as part of these proposals still constitutes the acknowledged significant benefit justifying development in the AONB.

#### **Employment**

Chapter 6 of the Environmental Statement sets out the estimate of direct and indirect employment associated with the development. This comprises 232 direct construction related jobs and a total of 119 other jobs associated with direct solar related work and the energy storage plans. This breaks down as:-

- 4 Ground maintenance
- 80 Operations and Management Team in existing building complex
- 25 administrative and technical and catering
- 10 full time equivalent at Corbin Industries

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On a more general level it is also relevant to note that recent research estimates that 1 gigawatt of installed solar capacity so far has led to 14,000 full time equivalent jobs. Working down the research then estimates approximately 20 FTE jobs per 7MW (BRE National Solar Centre March 2014).

### **Conclusion**

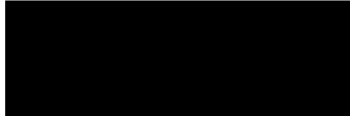
There is only one issue that might lead to the refusal of this application. The applicant and BSRL have made significant efforts in revised panel design and scientific research to demonstrate that the impact of the panels over a small part of the overall site will not adversely affect the grass. However, if there are residual concerns these are appropriately mitigated by site ecological management.

In our view there are two balancing exercises that need to be performed. Firstly, NE need to balance their view on harm against the application overall and not just consider the small area of the site they might allege is adversely affected. They also need to consider, in coming to a view, other ecology issues and the positive and agreed land management proposals set out.

However, if NE are not prepared to consider this themselves the balancing exercise must then be performed by WDDC. Secondly however WDDC also need to balance any adverse affect against the acknowledged significant benefits. I do not repeat these in detail but improvements to the visual appearance and character of the AONB; the delivery of renewable energy onto a previously developed land site; the significant contribution to renewable energy generally and the overarching socio-economic benefits are significant factors.

As revised this application deserves support.

Yours sincerely



**Dale Evans**  
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