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15 May 2015

Dear Mr Brightman,

**EAST DORSET DISTRICT COUNCIL PLANNING APPLICATION 3/13/0681/FUL:
24.2 MW MAPPERTON FARM SOLAR PARK**

1. Introduction and background

1.1 When first submitted in July 2013, the most striking feature of this planning application was the sheer size and scale of the proposal. For example, this feature was referred to by a number of Planning Committee Members in terms of the development being “big” or “too big”, with the implication that the former was acceptable but the latter wasn't ¹.

1.2 The resubmission has attempted to address this concern by reducing the number of panels from 112,000 to 90,000, a reduction of 20 per cent. What this represents, exactly, in terms of a reduction in total panel area, is not possible to say. The resubmission specifies a notional panel with dimensions 1.65 metres by 0.99 metres (Project Description, Appendix 3.1) but no comparable information was specified in July 2013. The total area of the currently proposed panels is 14.6 hectares or 36 acres, equivalent to 23 soccer pitches – still “big” or “too big”. It is suggested that, whatever notional panel the developer had in mind at the time of the first submission, its replacement with the currently proposed notional panel could not lead to a reduction significantly greater than 20 per cent.

1.3 Design and Access Statement, para.2.2 states “**Initially the Project was to be developed over 5 fields totally 70.67..... this has been reduced to 3 fields totalling 43.9 hectares.**” This statement is misleading. It implies that the potential adverse visual impact of the proposed development has been significantly reduced as a result of a 38 per cent reduction in the size of “the Project”. As explained above, the area covered by panels is not likely to be reduced by more than 20 per cent and it is our contention that the determining factor that influences the visual impact of a solar PV installation is the area of the panels themselves, i.e., the area of glass, not the area over which the panels are distributed.

1.4 Planning Statement, para.8.2 states “**A significant reduction in the area of land incorporated within the proposed development has been achieved....**”. This statement refers to the reduction of 38 per cent noted above and is similarly misleading. The important reduction achieved – that of panel area – is restricted to 20 per cent, close to half that.

1.5 Thus, the attempt to reduce size is not impressive. If built today, the installation would remain, at 24.2 MW on a 71 hectare development site, the second largest in Dorset County¹⁶ and rank the 11th largest greenfield solar park in the UK¹⁷.

1.6 On another aspect of the critical issue of size, the developer made it clear in July 2013 that ***“in order to be financially viable, it is necessary to develop the whole of the designated site, which itself is about 70 hectares. Due to the costs of connecting into the electricity grid, it is necessary to achieve a 28 MW production”***.⁴ The fact that the resubmission proposes a reduction of only 13.6 per cent in the proposed installed capacity, down from 28 MW to 24.2 MW, provides confirmation that size, through the requirement for a large output, remains the proposal's determining factor.

1.7 The conclusion that the developer hopes will be drawn from the extensive documentation it has submitted to support its proposal, is that a large ground-mounted solar photovoltaic installation at Mapperton Farm is the only remaining option if East Dorset wishes to generate any more significant amounts of renewable energy from its own resources - there is no other combination of location, technology, size or grid connection that would provide a comparable output without causing even more damage than they are asking to be accepted¹⁴. This is clearly a contrived and restricted view but assuming it is correct (and the Council maintains the principle of there being a level of damage that is unacceptable) the logical course of action for the developer is to look for opportunities for renewable energy deployment elsewhere, as they have done successfully in the past¹⁶.

1.8 It is clearly the case that a developer's requirement to make a profit is not a material planning consideration and cannot possibly justify approval for a large damaging development.

2. Landscape and visual impacts

2.1 Dorset CPRE is supportive of renewable energy but strongly objects to this particularly damaging proposal. The proposed site is greenfield, in unspoilt countryside, agriculturally productive and protected by national and local policies. The size of the proposal is such that it would be a large, artificial intrusion into beautiful, sensitive countryside and its scale would be incompatible with the small-scale landscape of its surroundings.

2.2 Dorset CPRE strongly supports the Cranborne Chase AONB and the David Wilson Partnership authoritative critiques of this proposal on grounds of landscape and visual impact.

2.3 The long awaited critical report 'Landscape Sensitivity to Wind and Solar Development in East Dorset District', commissioned by East Dorset District Council, prepared by LUC and published in April 2014, provides strong evidence that this proposed development should not be approved.

2.3.1 It concludes that sensitivity to a solar PV scheme of more than 30 hectares, located on exposed higher ground close to Great Coll Wood in the South Blandford Downs Landscape Character Area, could be as high as “high” (the highest sensitivity) and not lower than “moderate-high”, the next to highest sensitivity.

2.3.2 Whether or not the location of the proposed solar park warrants a designation of “high” or “moderate-high” is for specialist landscape architects to decide.

2.4 The proposed site would be totally within the Stour Valley/Mapperton Area of Great Landscape Value (AGLV)². East Dorset District Council's Local Plan Policy LSCON2³ states that within AGLVs development will be permitted where: (a) its siting, design, materials, scale and landscaping are sympathetic with the particular landscape quality and character of the AGLV, and (b) there would be no unacceptable damage to those built and natural features, including important trees and hedgerows, that contribute positively to the landscape quality and character of the area. Covering an area of 70.67 hectares, the proposed development site would occupy and degrade 5.5 per cent of the AGLV. This is clearly incompatible with Policy LSCON2 and consequently this proposed development should not be permitted.

2.5 The site faces south east with an approximately 10 metre (33 feet) drop from top to bottom (Project Description, Figure 3.1). This guarantees that 3 metre high hedging would not screen the

site from medium and long distance views from that direction.

2.6 The impact on views from locations such as the Purbeck Hills in the Dorset AONB and Morden need to be assessed.

2.7 The site would be clearly seen from surrounding footpaths and a bridleway that passes through the site. Walkers, riders and tourists would be adversely affected, especially those from Mapperton and Winterborne Zelston, which are only 500 and 750 metres away, respectively.

3. Impacts on heritage assets

3.1 'Planning Practice Guidance for Renewable and Low Carbon Energy', published by the Department for Local Communities and Local Government (DCLG) on 6 March 2014, states⁵ that a local planning authority should take great care "to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset."

3.2 Heritage assets are abundant in the area:

3.2.1 Grade II* listed 368 hectare Charborough Park is 1.2 km from the proposed development site which can be seen clearly from the extensive views to the west across the Winterbourne Valley from high ground within the park¹⁸.

3.2.2 The proposed development would be a dominant blot on the landscape from the top of Charborough Tower, also listed Grade II*. The base of the tower is 3.4 km from the site, 101 metres AOD. The top of the tower is 128 metres AOD¹⁹. The Planning Statement at para.2.2 reports the height of the development site to be 50-80 metres AOD.

3.2.3 The south east edge of the 48.5 hectare Great Coll Wood, an Ancient Woodland, is approximately 490 metres from the north east boundary of the area proposed for panels.

3.2.4 A Roman road crosses the site.

3.2.5 There are listed properties in the nearby hamlets of Mapperton and Almer and the village of Winterborne Zelston.

3.2.6 Both Almer and Mapperton are Conservation Areas. "The surrounding countryside extends into and through the Mapperton Conservation Area. The gaps between the buildings should therefore be considered as open countryside, rather than as village spaces"⁸. This observation can be viewed in the context of the replacement of open countryside 500 metres to the north of Mapperton with an industrial site containing 90,000 photovoltaic panels and supporting infrastructure.

3.2.7 Combs Ditch, 850 metres northwest, is the site of a major Romano-British defence line designed to hold back the Saxon invasion in the 6th Century.

3.2.8 Badbury Rings, the Ancient Monument in the care of the National Trust and in the Cranborne Chase & West Wiltshire AONB, is 7 kilometres north east at an elevation of 95 metres. The development site can be seen clearly from the ramparts of the monument.

4. Planning Policy

4.1 The National Planning Policy Framework (NPPF) at para.109⁹ states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing

valued landscapes. The proposed development is clearly incompatible with NPPF policy and it should not be permitted.

4.2 'Planning Practice Guidance' is clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities⁶. This statement recognises that the weight given to the need for renewable energy has led to a public loss of faith in the planning system.

4.3 'Planning Practice Guidance' also advises that when considering locations for renewable energy cumulative impacts should be taken into account⁷. For the County as a whole, 37 ground-mounted (>0.5 MW) solar PV installations have already been approved¹⁶. Their total projected annual output represents 45.6 percent of all renewable energy generation. A further 5 installations, apart from Mapperton, are awaiting a planning decision¹⁶.

4.4 Twelve of the already approved installations are within a 10 km radius of the Mapperton proposal¹⁶. The biggest has an installed capacity of 12.14 MW, half that of the Mapperton proposal. Their total installed capacity is 78 MW, more than 3 times the Mapperton 24.2 MW. The total number of panels is 310,226 and the total site area is 172 hectares or 426 acres, equivalent to 269 soccer pitches. The averages are: 6.5 MW installed capacity, 25,800 panels and site area 14 hectares or 35 acres, equivalent to 22 soccer pitches.

4.5 Minister of State for Energy and Climate Change in the Department of Energy and Climate Change (DECC), Gregory Barker MP, in his keynote speech to the Large Scale Solar Conference held at County Hall, Truro on 25 April 2013¹¹, made the following statements that confirm and provide more detail to support the planning guidance advice set out in the DCLG document referred to above:

4.5.1 "Solar is a genuinely exciting energy of the future. But not at any cost, not in any place, not if it rides roughshod over the views of local communities. As we take solar to the next level, we must be thoughtful, sensitive to public opinion and mindful of the wider environmental and visual impacts."

4.5.2 Referring to the current high public support for solar, he said "We want to keep it that way. This means it must work for local communities with larger deployments brownfield land should always be preferred."

4.5.3 "..... solar has been installed on disused airfields, degraded soil and former industrial sites. This is the model for future solar projects".

4.5.4 "Our message is very clear. Where solar farms are not on brownfield land, you must be looking at low (*sic*) grade agricultural land which works with farmers to allow grazing in parallel with generation."

4.5.5 It can be noted that comments similar to the above were made by the Minister in an Oral Answer to a Question from Dr Sarah Wollaston, MP for Totnes, in the House of Commons on 11 July 2013¹².

5. Best and most versatile agricultural land

5.1 The proposed development site contains agricultural land that has been classified under the Agricultural Land Classification system as Grade 3a "best and most versatile" (24 per cent) or 3b (76 per cent)¹⁵. With reference to 7.4 above, neither of these is 'low grade'¹³.

5.2 The NPPF at para.112^{10a} states: "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land (i.e. Grades 1, 2 and 3a^{10b}). Where significant development of agricultural land is demonstrated to be necessary, local

planning authorities should seek to use areas of poorer quality land in preference to that of higher quality". With regards to this statement, it should be recognised that although Grade 3b land is poorer, relatively, than 3a it is not poor in an absolute sense - it is 'moderate'. 'Poor' is ascribed to Grade 4 (poor) and Grade 5 (very poor)¹³.

5.3 Thus, current Government policy, as set out in NPPF and as expressed by a Minister of State at DECC, is clear that only agricultural land Grades 4 and 5 are appropriate for deployment of large solar farms and on this basis alone the planning application for the Mapperton Solar Farm should be refused.

6. Alternatives to the proposal

6.1 The following are suggestions for alternatives to the proposal:

6.1.1 Several small solar parks in preference to a large one. A small solar park can potentially be accommodated within the landscape more easily. An example is the proposed 5 MW solar park east of Manston, Sturminster Newton. The development site is 12 hectares (equivalent to 30 acres or 19 soccer pitches) and has a panel area equivalent to 5 soccer pitches – 22% of the area of the Mapperton panels. However, this specific example may have characteristics, other than size, that render it unsuitable.

6.1.2 The County's current shortfall in projected annual renewable energy generation of 105 gigawatt hours¹⁶ could be achieved if 3 to 4 solar installations of this size were built in each of the six constituent Districts and Boroughs of the County (East, North and West Dorset Districts, Purbeck District and Christchurch and Weymouth & Portland Boroughs).

6.1.3 The Government²⁰ has made it clear that it is not acceptable for solar parks to replace the growing of crops on productive arable land. As an alternative, it promotes a substantial increase in the use of commercial and industrial roofs as more appropriate sites for solar panels. Reforms to permitted development rights that came into force on 15 April 2015 allow for a twenty fold increase in the amount of solar PV that can be deployed on non-domestic roofs.

6.1.4 The Government promotes, encourages and provides advice and support for community-owned solar parks. That way communities enjoy all the profits – not just token hand-outs from developers or land owners.

7. The need for the proposal

7.1. The current estimate for annual renewable energy generation in Dorset County is 585.7 gigawatt hours. This estimate, published by Dorset CPRE¹⁶, is based on (1) Government renewable electricity databases that are updated either monthly or quarterly and Government renewable electricity projection methodology which takes into account installations that are either operational, under construction or awaiting construction and (2) the RegenSW renewable heat database that is updated annually and takes into account operational installations only.

NB The Dorset Energy Partnership does not recognise Government projection methodology for reporting renewable energy generation. It publishes an annual report for the area covered by Bournemouth, Dorset County and Poole, without disaggregation, and takes into account operational installations only.

7.2 585.7 gigawatt hours (GWh) is equivalent to 84.8 per cent of the County's 2020 Target of 690.7 GWh (7.5 per cent of the County's estimated total 2020 energy consumption of 9,210 GWh)¹⁶.

7.3 On 22 April 2014 the Christchurch Borough Council & East Dorset District Council Partnership adopted a common Policy ME8 Sources of Renewable Energy. It is therefore relevant to know that the current projection for annual renewable energy generation for the Partnership area is 194.9 GWh or 86.2 per cent of the 226.2 GWh 2020 target (these figures can be deduced, by simple addition, from the data presented in the Executive Summary of Reference 16). It can be noted that

this indication of progress is slightly greater than 84.8 per cent, that for the County as a whole.

7.4 Dorset County's record of and prospects for renewable energy generation and progress towards its target are impressive. The fact that several years remain before the final run-up to the target date of 31 December 2020, suggests that from now on there is no need to approve any renewable installation that does more than minimal damage to the County's exceptional and highly valued landscape, heritage, agricultural and amenity assets.

7.5 Of course, a target is not necessarily a ceiling and every effort must be made to fully exploit all of East Dorset's renewable energy resources and photovoltaic technology cannot be an exception. However, as Minister of State Gregory Barker stated, with specific reference to large-scale solar, this must not be done at any price. The price that would have to be paid if the Mapperton Farm proposal were to be approved far exceeds anything that East Dorset should be prepared to pay.

8. Local community objection

8.1 To date, in excess of 650 written objections to the proposal have been registered by East Dorset District Council. This is in stark contrast to the single letter of support. More importantly, over half the residents living in the hamlets and villages living within two miles of the centre of the site to the south, the main area affected, have objected, excluding those living in Drax-owned property. Every household in Mapperton, excluding those living in Drax-owned property, has objected to the installation while over 80 letters of objection have been sent by residents of Winterborne Zelston, Winterborne Tomson and Anderson, all in the adjacent North Dorset district. Further, on 14 May 2015, Sturminster Marshall Parish Council voted, unanimously, to reject the proposal.

9. Conclusion

We respectfully suggest that the evidence and reasons we have provided are sufficiently strong for Planning Application 3/13/0681/FUL to be refused.

Yours sincerely,

David Peacock

David Peacock BSc(Eng) DIC PhD
for Dorset Branch CPRE

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4. Design and Access Statement, para.2.5, 25 July 2013.
5. 'Planning Practice Guidance for Renewable and Low Carbon Energy', paras.7(4th bullet point) & 13(6th bullet point), Department for Local Communities and Local Government, 6 March 2014.
6. Ibid., paras.3 & 7(1st bullet point).

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8. Mapperton, p.3, Conservation Areas in East Dorset, Supplementary Planning Guidance No.8, East Dorset District Council, September 2005.
9. National Planning Policy Framework, para.109, p.25, Department for Communities & Local Government, 27 March 2012.
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13. Agricultural Land Classification of England and Wales, Section 2, pp.9 -10, Ministry of Agriculture, Fisheries and Food, (revised) 1988.
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15. Ibid., Appendix 9.1, p.4.
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