

REPRESENTATIONS FOR STRATEGIC PLANNING COMMITTEE

Monday 24 January 2022

PLANNING APPLICATION No. P/FUL/2021/02046; LAND AT PARK FARM GILLINGHAM

Objection 1

From Elizabeth Clinton

Motcombe and Gillingham are distinctly different communities. The industrial aspect of the proposed solar site will appear to be part of the expansion of Gillingham. It is vital to retain a **GREEN BELT** on the parish boundary to protect the identity & visual separation of the village & town.

Please consider the **well-being on mental health** that beautiful landscapes have on Dorset residents and its visitors.

My impression of LC's proposal is one of a generic type, bashed out along with others around the country. I see no empathy or real effort to understand this individual site that does have significant meaning for those who live around it.

Dorset Council's own Renewable Energy Planning home page cites an 80 page [informal planning guidance for all common renewable energy technologies \(March 2016\)](#). The BRE National Solar Centre published its Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems. The House of Commons Library Briefing Paper on Solar Farms: Funding, Planning and Impacts. All these guidances reiterate the same points that have been insufficiently regarded in this proposal.
Notably:

1. **Grade 3a agricultural land** should not be used for solar installations and if so "The developer's proposal should Provide an explanation of why the development needs to be located on the site and not on land of a lesser agricultural classification within the area." **Low Carbon have erroneously described this whole site as Grade 4 BUT approx 1/3 of this site is classified Grade 3a** (DEFRA:
<https://environment.data.gov.uk/DefraDataDownload/?mapService=NE/AgriculturalLandClassificationProvisionalEngland&Mode=spatial>)

2. Iconic views (from Shaftesbury) are ignored & the historic **White Hart Link** and other by-ways are undervalued. Slow growing screening will be inadequate even in 15 years. LC's report was made in Spring when the trees were in leaf to minimise the impact. This site in the vale is exposed and impossible to hide.
The cumulative affect of adding more solar farms to this area has not been noted.

3. Scheduled Monuments. LC hasn't adequately addressed this in line with guidance documents.

4. Flooding. The site is subject to extensive flooding. Fern Brook transforms into a torrential & substantial body of water as seen twice in October 2021 & each year with heavy rainfall. Channels of water flow across the site to join Fern Brook. The construction of hard core tracks, various foundations combined with lines of run-off from the panels risk making the current natural system operate differently. This risk lies with 'next stop' Gillingham. This site is a key area that absorbs heavy water flow from disgoring more rapidly into the town. It deserves particular scrutiny.

The list goes on. Expert reports submitted to this planning application overwhelming **OBJECT**.

Objection 2

From Liz Wegwermer

Whilst absolutely appreciating the importance of renewable energy sources, I believe this application should be refused.

The proposed installation will not provide renewable energy to the locale in which it is to be sited yet its development will cause local disruption.

It is detrimental to the area designated as the site of the original Royal forest which is noted on signs leading to Gillingham. This area is enjoyed as a rural facility & recreation area by local people in the surrounding areas.

The installation is far too big for the proposed site and will be detrimental to the views from Castle Hill which provide a valuable tourist attraction to Shaftesbury locals & visitors.

Views towards Gillingham & Wincanton from Castle Hill already include between 5 & 7 Solar Farm installations of varying sizes and can be clearly seen as 'grey mirrors' spreading to the horizon. They are not, as one Shaftesbury councillor described, rather "sparkly" and whilst 'planting' intends to soften the outline this takes many years to grow.

Renewable energy has several sources I do not believe this site in this area to be appropriate for such an enormous number of PV panels. The Prime Minister is quoted as saying that renewable energy should primarily come from Offshore wind farms.

Objection 3

From Bernard Ede BA(Hons) pgDipLD FLI
Retired Chartered Landscape Architect & retired Fellow of the Landscape Institute

My Objections to the above Application are;

1 FAILURE TO CONSIDER VIEWS FROM SHAFTESBURY:

The Application is incomplete as it fails to identify important public views from Shaftesbury & demonstrate the effectiveness of mitigating measures.

There are spectacular uninterrupted, panoramic views towards the site from Castle Hill Green (215m A.O.D.), a Scheduled Ancient Monument, from Littledown (230m A.O.D.), within Cranborne Chase AONB, & from the Hardy Way & White Hart Link sub-regional Trails along the edge of the Shaftesbury Greensand escarpment.

Castle Hill Green is a significant public open space, regularly-frequented by local residents, & visitors, both nationally & internationally.

Littledown public open space currently has restricted access due to current housing construction.

The site, at 75-80m A.O.D., occupies open low-lying ground centred within the extensive view of the Blackmore Vale & the Ancient Royal Gillingham Forest, an area of landscape enhancement.

The Vale is famous from literature & is typical of generally flat, lowland clay vales of Southern England, with predominantly pastureland, enclosed by hedges, interspersed with trees, copses & woodland. The Vale is described as having "a speckled appearance & an overall unity when viewed from the escarpment ridge" *.

2 DETRIMENTAL VISUAL IMPACT:

The installation of elevated arrays of solar panels, orientated to the South on flat & slightly sloping topography, accompanied by hard infrastructure, will constitute an industrial intrusion in an otherwise soft & verdant landscape where there are no abrupt edges or sharp contrasts.

The panels will reflect natural light & sunlight & will have an exaggerated detrimental visual impact from elevated ground at Shaftesbury.

Existing Solar Farms on elevated sloping topography in East Somerset to the West-north-west (some 16km distant) are visible from Castle Hill & Littledown. The proposed solar farm is 4km distant.

3 INEFFECTIVENESS of PLANTING:

Proposed planting will not mitigate the adverse visual impact of the panels due to elevated views into the site.

Even if established, planting aimed at screening will conflict with solar-capture. In Winter, lack of foliage & the lower solar trajectory will increase reflection & amplify detrimental visual impact.

4 LACK of PUBLIC CONSULTATION with SHAFTESBURY RESIDENTS:

No consultation with Shaftesbury residents has been undertaken by the Applicant.

5 LOSS of AGRICULTURAL LAND:

Land will be lost due to construction & obstacles created by the solar panel support framework.

Construction will lead to compaction & loss of topsoil structure in prevailing wet conditions.

6 LAND LIABLE to FLOODING & WATERLOGGING:

The clay subsoil & topsoil render the ground impermeable. The ground is liable to waterlogging & increasing incidence of localised flooding which will have downstream impact in Gillingham.

ref.* BURDEN, R. & Le PARD, G. (1996) "A New View of Dorset." Dorset Books

From Gillian Lewis

OBJECTION TO PROPOSED SOLAR DEVELOPMENT AT PARK FARM GILLINGHAM

1. Solar capture. as a step towards reducing climate change, can be positive, if suitably located. This site is wrong for the purpose. The applicants seem unaware or do not recognise that this area is at the heart of an historic landscape - Gillingham Royal Forest and the Blackmore Vale - and that significant public views from Shaftesbury and the AONB will be damaged long term. Shaftesbury residents have not been consulted about the permanent impact, both visually and environmentally.
2. To propose a mitigating screen of minor planting, demonstrates lack of experience of siting industrial installations in such special, rural contexts; from Shaftesbury's high greensand ridge just 4km to the south, the 180 degree vista over Dorset's typical woods, fields and hedges will be drastically impacted, as will the natural habitats.
3. The proposal to establish a long term industrial site, involving concrete bases, cable feeds, tarmac access routes, reflective plastic panelling, sub-stations, etc. with no possibility of environmental reinstatement in our lifetimes, likely would set a precedent for further unsightly spread and brownfield site status across this section of precious countryside.

From Gregory Clinton

I attended the presentation by Low Carbon at Motcombe Village Hall on 17th August 2021, where there were posters of flowers and bees and jars of honey for attendees. No pictures of the 2m high security fencing that will surround the site. They failed to provide a copy of the Environmental Impact Assessment. In section 6.4.14 it states Donedge Lodge Farm (closest to the proposed site) "would have potential views of

the site” and “a limited zone of visibility”; this is wholly inaccurate, the site is in full view of this property. The entire EIA, commissioned by Low Carbon, is biased in favour of the client and is not an impartial document. For example Section 6.2.25 on local views states the site would “preserve and enhance such views where possible”; how exactly can a 92 acre industrial park possibly enhance the views? There is much written in the report about “safeguarding” access and “an important green infrastructure resource”; the fact is it is an industrial site right where people enjoy the countryside. The proposal should be rejected for the following reasons:

- According to Low Carbon’s website the installed capacity 25MW will only produce ~45MWH. This should be around 25000MWH and shows Low Carbon’s incompetence when they claim to be experts.
- It will impinge on local people and tourists’ enjoyment of this beautiful part of Dorset, the bridlepath running right next to the northern boundary is part of the historic White Hart link enjoyed by many walkers. Photomontages submitted on 9/7/21 showing impact on views are taken from the most favourable angles LC could find.
- There are 3 Scheduled National Monuments very close by, King’s Court Palace, East Haines House and the Park Pale. It’s 500 meters from the housing at East Ham.
- We already have 3 solar farms close by. Much is made in the proposal that it is a temporary structure, 40 years is half a life time.
- It flies in the face of Dorset Wildlife Trust project to “restore, recreate and reconnect a historic landscape” at Gillingham Royal Forest.
- The “Good Quality Landscaping” hedges & trees planting proposed are totally inadequate as the site is at a low point in the surrounding countryside and will be seen from many directions.
- Government policy states all our renewable energy will be offshore wind by 2030.
- Solar is suitable on brownfield sites, buildings, next to motorways; let’s face it, winters here are dark and summers questionable.
- The project will create massive disruption to traffic on the Gillingham Shaftesbury road if dug up to access the substation 4.5 kms away is dug up.

**Statement from Motcombe Parish Council on planning application
P/FUL/2021/02046**

Cllr John Taylor (on behalf of Motcombe Parish Council)

Motcombe Parish Council has twice considered this proposal and on both occasions rejected it as an unsuitable site for such a development.

The North District Council Local Plan, which in the absence of an approved Dorset Council Local Plan should be considered as still valid, provided a framework for assessing green energy projects. We believe this application does not meet the criteria for acceptance for visual impact and historical environment.

The solar farm will be highly visible from surrounding vantage points. None of the photographs show the visual impact from any elevated position within the Parish. Recent amendments proposed additional screening to reduce the visual impact, however any screening will not be effective for several years. Any increased screening along the northern boundary will restrict the views from the bridle path which is part of the White Hart Link long distance footpath thereby reducing the amenity value of the footpath.

The site sits within the boundary of the Gillingham Royal Forest. Dorset Wildlife Trust has secured considerable National Lottery funding to increase awareness of this historic area. Motcombe Parish Council strongly supports this initiative as the parish lies within the old boundary of the forest. We believe that the solar farm is incompatible with this project's aims, and it lies near to the two historic sites of the listed Kings Court Palace and the Park Pale

The submission from Highways concentrated on the movements of vehicles on and off the site during construction, but one aspect apparently not considered is the likely disruption which will be caused on the busy B3081 during the excavation for the cabling work linking the site to the substation at Hawkers Hill. This will also lead to rat-running through the parish using Motcombe's inadequate rural road network, exacerbating the already congested situation near Motcombe school. We do not believe that the potential noise and vibration of the solar farm when in full operation has been properly evaluated.

During the consultation phase of the Motcombe Neighbourhood Plan residents strongly expressed the view that the parish should maintain the separation from Shaftesbury and Gillingham to maintain its rural character. The proposed development would be on the eastern edge of Gillingham and start to erode that separation.

For these previously stated reasons we believe that the application should be rejected.

APPLICANT'S WRITTEN STATEMENT IN RELATION TO APPLICATION P/FUL/2021/02046

Dear Members,

We are Low Carbon, the applicant for the Fern Brook Solar Farm application being considered today and here are the key reasons for approving this project.

- It's a difficult decision today – a climate emergency and energy crisis balanced against local concerns and impact on Gillingham Royal Forest Area.
- This temporary development will power 9,968 homes for the next 40 years (at the end of which the site returns to greenfield land). The Battery Storage component will help the wider network manage and increase utilisation of renewable energy.
- Why here? We first have to find capacity in the distribution network and we search across the UK. Once we identify grid capacity (in this case, at

Shaftesbury Substation) we search for undesignated and less constrained land within a viable distance and contact landowners. If we have an interested landowner we undertake wide range of assessments to design low impact schemes.

- Dorset Council's draft Climate and Ecological Emergency Strategy outlined that for Dorset to generate 100% of its own energy demand, they will therefore need around 4GW of solar (around 19,000 acres) or 2GW of wind (around 700 big turbines), or a combination of the two. Over 100 schemes of the size proposed today. As of September 2021 Dorset has around 0.3GW of installed renewable energy, a long way to net zero!
- Significant landscape planting and a BNG improvement of 31.7% habitat units and 8.87% hedgerow units.
- We have also proposed to upgrade part of the bridleway running adjacent to the site, currently in poor condition – therefore improving access along the White Hart Link which benefits the GRFA. In addition we've proposed a financial contribution of £50,000 to the Gillingham Royal Forest Area project secured by s106 agreement. This would fund approx. 31,000 new trees offsite.
- Land directly adjacent to the west of the application site is allocated for a major mixed-use development of up to 634 dwellings and a primary school (Gillingham Southern Extension) and is subject to the grant of outline consent (May 2020). This land is also within the footprint of the former Royal Deer Park and sits much closer to the Scheduled Monuments. Once implemented, the GSE will have a significantly greater and permanent impact on both of these assets compared with the proposed development which comprises low lying solar panels, removed after 40 years without any permanent impact. For the avoidance of doubt, the application site is not within or adjacent to a Scheduled Monument Area.
- In closing the effects of the climate emergency and the energy crisis affects everyone and we all have to contribute to the solution. If approved the project will power all the homes of Gillingham, Shaftesbury and Motcombe whilst improving bridleway access, improving biodiversity, maintaining grazing and financially supporting an agricultural business.

James Hartley-Bond – Head of Project Development

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**Planning Application P/FUL/2021/02622 – Eco Hub, Blandford Hill,
Winterborne Whitechurch.**

Objection 1

**From Ian Bruce (Former Renewable Energy Consultant and Resident of
Blandford Hill, Winterborne Whitechurch)**

This Planning Application must be **REJECTED** despite the Solar Park component having merit and my full support. The applicant must be asked to resubmit their proposals, which should be separated into 3 stand-alone components in order to identify which of these are contingent: (i) Solar Park; (ii) Energy Storage and Vehicle Battery Charging Facility; (iii) Shop/Cafe/Rest Area/Toilets.

The importance of promoting renewable energy production and vehicle battery charging infrastructure cannot be overstated, **but this should not be at any cost.** The applicant has failed to provide a compelling case to co-locate these 3 distinct components at this isolated and valuable greenfield site. The renewable energy generated by the Solar Park can be easily and cost effectively transported and distributed (with minimum losses) utilizing the local Electricity Distribution Network to which it will be connected and to which all our homes and businesses are connected. This will allow the renewable energy generated by the Solar Park to be used to supply vehicle battery charging facilities (and for many other uses including storage) at existing and more appropriate locations in the County, e.g., at fuel stations and supermarkets in or near to our local towns, e.g., Blandford, Dorchester, Wareham, etc. Indeed, the fully interconnected Electricity Distribution Network can be used to transfer the renewable energy to virtually any and every part of our region, providing a huge number of choices for locating the energy storage and vehicle charging facilities. It beggars belief a valuable remote rural site must be destroyed when there are so many existing and underused brownfield sites currently available, including prime locations adjacent to the primary trunk road system.

Locating vehicle battery charging infrastructure close to existing retail and leisure facilities in or near to Dorset's market towns would have the additional benefit of attracting passing visitors to make good use of local amenities while waiting (often 30 minutes or a lot more) for their vehicle batteries to be charged. For example, local shops, restaurants, hotels and pubs would all benefit from the increased passing trade while local residents without home charging facilities (i.e., having only on-street parking) would also be able to take advantage of the facilities. Many potential brownfield locations are already used for other purposes and benefit from services such as good road access, mains drainage, street lighting and the 'personal safety and security' that comes from being located in or near existing urban public spaces. Sadly, making use of an isolated rural location after dark to charge vehicle batteries is an open invitation to criminals and those who might want to do us harm. This is particularly the case for vulnerable people travelling on their own.

Please **REJECT** this Planning Application.

Objection 2

Mr Julien Turner

THE OFFICER'S RECOMMENDATION TO ACCEPT IS SIMPLY NOT SUPPORTED BY THE SHEER WEIGHT OF EVIDENCE WITHIN HIS EXCELLENT &

COMPREHENSIVE REPORT - CONCERNING THE DISBENEFITS OF THE PROPOSAL.

IN PARTICULAR, THE REPORT STATES THAT "WIDER BENEFITS" CAN BE GIVEN SUBSTANTIAL WEIGHT IN THE PLANNING PROCESS ... WHICH CONFLICTS ALSO WITH ACKNOWLEDGEMENT THAT THE APPLICATION MAKES ONLY A RELATIVELY SMALL CONTRIBUTION TO THE VERY AMBITIOUS (2040) COUNCIL TARGETS - AND WHICH IT IS DULY NOTED ... ARE STILL IN DRAFT FORM.

THIS MISMATCH OF LOGIC AND TENUOUS BASIS OF EVIDENCE ... DEFIES SOUND PRINCIPLES OF DEVELOPMENT CONTROL ... AND WOULD BRING THE WHOLE PLANNING PROCESS INTO DISRESPECT ... IF ACCEPTED.

IT OFFENDS THE INTELLECT ... AND IT WILL BE VIEWED ACCORDINGLY BY THE WIDER PUBLIC IF ACCEPTED.

Support 1

From Angela Erkan

I am writing this statement in support of the proposed Eco Hub, which is hopefully being built near Winterborne Whitechurch Dorset.

I do live in the village and cannot see any reason why it shouldn't be built .

We have to think of the future for our children and grandchildren , who will be more likely to use hubs , electric chargers and relax while waiting in the cafe . .

As a society now we must think of greener ways of protecting the planet for future generations . This Eco hub is one way we can do that locally .

different points were raised at a local meeting, which were answered by the spokesman from Naturlis . Points raised were extra traffic, but i can't see that happening but we do know ev cars are quieter and your not going to suffer pollution like you would with petrol or diesel cars.

providing employment for I think 8 people would be great for local people, even as I don't have an electric car the thought of a cafe and shop would be a great asset to the village, as it is also in walking distance it can only be a positive move for Dorset.

We live in Dorset in a tourist area, not far from beaches and our beautiful Durdle Door and Lulworth. from a tourist point of view what a lovely location to stop re charge and relax in cafe.

Thankyou for listening

Support 2

From A.C. Senior

Regarding the proposed eco hub and solar farm on Blandford Hill next to the A354 near Winterborne Whitechurch. I as someone who would be greatly affected by this proposal, I think it is one of the best ideas I have heard of in a very long time.

I believe that this installation would be and is vital to the future infrastructure of Dorset and the local area of Blandford and the current lack of any great amount of chargers in and around Blandford.

It seems that there is opposition to this site in the local area, I cannot see why as in 8yrs time almost all households will have an electric vehicle and not everyone can have or afford a home charger.

I have heard comments in the village about this proposal most of which at best are ill inform and at worst are rubbish and amount to "Not in my backyard"

In conclusion I can only say (and i am not alone) that the quicker we get this the better (so that i can get an EV).

Support 3

From Martyn Gleaden.

I was a Councillor for Winterborne Whitechurch Parish Council, however I am no longer a Councillor and wish to comment in support of the application.

The proposed Eco Hub will have little detrimental effect to Winterborne Whitechurch but will instead provide several benefits. Very few of the properties in the village will have the facility for charging an electric vehicle despite the country moving towards almost fully-electric in the next ten years. Yes, there will be limited charging facilities in Blandford Forum and Bere Regis but none of these would be the high-speed charging points proposed by Naturalis. The Hub may also provide some local employment opportunities which currently don't exist in a village with a stagnant economy. The land proposed for construction of the Hub doesn't produce a significant income for the farmer, and as most farmers in the area are suffering from rising costs, loss of EU payments, etc the long-term viability of agriculture as the main land use around the village is in question. Without the income to the landowner this Hub will provide, it is possible that land will have to be sold for development changing the identity of the village forever and not just the proposed lifespan of the hub.

As a local historian an archaeologist I am aware of the findings of the Magnetometer Survey, Heritage Report, and various Test excavations on the proposed site and their conclusions agree with my findings from field-walking and historical research, particularly on the Deveril-Rimbury Culture which includes all local barrows and cemetery complexes. There is nothing historical on the site which would be affected by construction, and nothing which isn't duplicated on almost every part of North Down. English Heritage raised objections based in insufficient local knowledge; four of the seven barrows which formerly ran along North down have been ploughed out,

leaving only three, the nearest to the site also having suffered plough damage. The other historical sites they mention cannot be seen or said to be impacted by the site in any way

The site is outside the AONB and a nearby large, industrial Egg Packing plant (now being converted to a storage facility) obviously has more visual impact than the site which is going to be surrounded by trees and hedgerows and will, in the main, not be visible from the village.

Statistics show a very low incidence of accidents on the A354 approaches to Winterborne Whitechurch, unlike the junctions to Kingston and at Thornicombe. Both these accident-prone junctions are wide and have excellent visibility. There's no reason to assume the entrance to the Hub will significantly increase accident rates or cause a traffic hazard.

Thank you

**Applicant's written statement (application ref. P/FUL/2021/02622)
Matt Partridge, for and on behalf of Naturalis Energy Developments Ltd**

Good afternoon. Naturalis is proud to present this first-of-its-kind development in Dorset. The Blandford Hill Eco Hub, if approved, would:

- significantly increase renewable energy generation in the county;
- help tackle Dorset Council's Climate Emergency; and
- support and encourage the uptake of electric vehicles.

The solar panels would provide renewable electricity equivalent to the needs of around 4,000 typical UK homes per year. The project would also bring new, modern and reliable electric vehicle charging infrastructure to the county, plugging a regional gap for this type of facility. The location is ideal, being adjacent to a busy A-road, with safe access, well set back from residences and critically, with a nearby grid connection.

The UK Government's ban on the sale of new petrol and diesel cars is less than 8 years away. However, progress towards a low carbon, electric vehicle future is a mixed picture. As the Chief Executive of the Society of Motor Manufacturers and Traders said earlier this month:

"...the undeniable bright spot is the growth in electric car uptake...The biggest obstacle to our shared net zero ambitions is not product availability, however, but cost and charging infrastructure."

The project before you would significantly increase both the quantity and quality of public electric vehicle charging in Dorset. By providing at least a dozen rapid and ultra-rapid chargers, it would double the number of this type of charger currently on the A354 between Salisbury and Weymouth. With a further 7 fast chargers, this project would decisively plug a public charging "gap". It would also provide for the first time on this stretch of road modern, ultra-rapid charging capabilities that can add 100 miles of range every 6 minutes.

Naturalis is delighted that this exciting project has attracted genuine interest and support from the local community (including the parish council) and local businesses. The hub will provide employment opportunities during construction and operation and has the support of the Dorset LEP.

We are very pleased to note the recommendation for approval from your officers and hope that you, too, will support this scheme and help ensure that rural

Dorset does not fall behind as transport in the UK rapidly moves to a zero carbon, electric future.
Thank you for your time.