

REBUTTAL PROOF ON PLANNING MATTERS

COTMOOR SOLAR FARM, LAND NORTH OF HALLOUGHTON, SOUTHWELL

ON BEHALF OF JBM SOLAR PROJECTS 6 LTD

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Prepared by: Paul Burrell, BSc (Soc Sci) Hons, DipUP, MRTPI

PROPOSAL:

**CONSTRUCTION OF A SOLAR FARM AND BATTERY STATIONS TOGETHER
WITH ALL ASSOCIATED WORKS, EQUIPMENT AND NECESSARY
INFRASTRUCTURE**

Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | **F** 01285 642348 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

©Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.	PERSONAL BACKGROUND	1
2.	INTRODUCTION	2
3.	REVIEW OF CONSENTED RENEWABLE ENERGY SCHEMES IN THE DISTRICT	3
4.	CONCLUSION	7

APPENDICES:

APPENDIX 1: REVIEW OF HONOR WHITFIELD'S APPENDIX A & B

APPENDIX 2: TERMINOLOGY

1. PERSONAL BACKGROUND

- 1.1 My name is Paul Burrell. My qualifications and experience are set out in my Proof of Evidence.

- 1.2 The evidence that I have prepared and provide for this Section 78 appeal is true and has been prepared and is given in accordance with the guidance of my professional institution. I can confirm that the opinions expressed are my true and professional opinions.

2. INTRODUCTION

- 2.1 This short Rebuttal Proof of Evidence addresses specific evidence presented in Ms Honor Whitfield's Planning Proof of Evidence (CD C8 – A2).
- 2.2 The rebuttal naturally does not cover other points raised in Ms Whitfield's Proof of Evidence and my not referencing each point should not be taken to indicate my agreement with Ms Whitfield's approach, analysis or findings.

3. REVIEW OF CONSENTED RENEWABLE ENERGY SCHEMES IN THE DISTRICT

- 3.1 Ms Whitfield sets out in her evidence a Table on Page 22 a review she has prepared of all consented renewable energy schemes in the District (excluding small scale domestic schemes) since 2011, with details attached to her Evidence in her Appendices A and B.
- 3.2 I have reviewed this evidence and have noted a number of discrepancies and errors which in my opinion significantly alter the overall picture she presents.
- 3.3 Attached to this Rebuttal proof at my Appendix 1 is the same schedule of energy schemes, but I set out in the right-hand columns the correct figures contained from the Council’s planning records available on the web site.

APPENDIX 1: REVIEW OF HONOR WHITFIELD'S APPENDIX A & B

- 3.4 Whilst I concur with the capacity of the majority of the energy schemes cited, I note discrepancies in capacity as summarised in Table 1 below. In some instances, this appears to be as a result of misapplication of different capacity and generation terminology. To assist the Inquiry, I set out a description of the terminology in my Appendix 2.

APPENDIX 2: TERMINOLOGY

Table 1: Discrepancies in Estimated Capacity by Individual Scheme

My Appendix 1 Table Site Ref	NSDC Planning Ref	LPA's Estimate (kWp)	Correct Figure (KWp)	My Observations
1	11/00333/FULM	46,000	4,600	Wrong conversion factor applied by LPA. 4.6MWp is 4,600kWp rather than the claimed 46,000kWp
5	11/01547/FUL	42,000	48	The LPA have incorrectly applied the stated 40-42,000 kWh as the KWp output of the site. The DAS states there will be 59 panel stands of 4 panels each = 236 panels. The manufacturer's panel sheet submitted refers to panels in the range of

				180w-205w each. This means the maximum installed capacity would be 48.38kWp (236 panels x 205w panels = 48,380 watts or 48.38kWp)
19	12/01594/FULM	9,800	7,800	The consent was varied in 2014 reducing its capacity to 7,800 KWp.
23	14/00839/FULM	11,650	11,880	Application documents reveal a slightly higher output than cited by the LPA
42	17/00718/LDC	113,362	11	The LPA have incorrectly applied the stated 113,362 kWh as the KWp output of the site. The LDC application stated the scheme was less than 1MWp to benefit from Permitted Development Rights, so it cannot have been more than 1MWp. (520 panels x 265w each = 137,800w or 137.8kWp)
61	12/00433	680	650	DAS stated a lower figure of 650kWp
62	12/00716/FUL	330	0	Double-counted entry, as scheme already included in Table Site Ref 60 (this was an amended scheme of same 330kWp capacity)
66	12/0415/FUL	90	50	Application documents state 50kWp.
78	14/01415/FUL	2,088	1,500	Officer report stated the scheme was 1,500kWp.
79	14/01414/FUL	2,088	1,500	Officer report stated the scheme was 1,500kWp.
86	14/02169/FUL	500	0	Double-counted – this a variation to an earlier planning permission already included in Table Ref Site 77.
87	13/00893/FULM	3,200	500	Double-counted the solar element of 3.2MWp already included in Table Ref Site 38. Is additionality from the wind turbine at 500kWp.

93	17/00472/FULM	350	175	Double counted. First boiler of 175kWp already included under Table Site Ref 88, this secured additional consent for the second 175 kWp boiler.
103	20/00201/FUL	350	330	Biomass Boiler Methodology document indicates head output is 330kWp.
107	20/02533/FUL	100	97	A Non-Material Amendment was approved (21/00694/NMA) which reduced the overall scheme by 3kWp.

3.5 The combined effect of these discrepancies is shown in my Table 2 below, which summarises the Output estimates from consented schemes in MW from Ms Whitfield and myself, as set out in detail in my Appendix 1. It should however be noted that not of all the permissions so identified will necessarily have been implemented.

Table 2: Comparison of Estimates of Consented Capacity (MW) between LPA and Appellant on basis of my Appendix 1

Monitoring Period (April – March)	LPA Estimate of All Renewable Schemes Capacity (MWp)	Appellant Estimate of All Renewable Schemes Capacity (MWp)	LPA Estimate of Solar PV Capacity (MWp)	Appellant Estimate of Solar PV Capacity (MWp)
2011/12	91.83	8.48	88.53	5.19
2012/13	10.02	9.66	1.0	1.0
2013/14	13.17	11.08	10.01	8.01
2014/15	54.03	53.08	47.75	47.98
2015/16	39.02	38.52	37.82	37.82
2016/17	7.12	4.4	3.73	3.73
2017/18	117.28	3.88	113.37	0.15
2018/19	6.29	6.29	1.25	1.25
2019/20	149.9	149.9	149.9	149.9
2020/21	2.6	2.58	0	0
2021/22	49.93	49.93	49.93	49.93
TOTAL	541.2	337.8	503.3	305

3.6 Taking the overall renewable energy capacity consented over the last decade, on the basis of these figures I estimate that the true estimate is 337.8MWp. rather than Ms Whitfield’s far higher estimate of 541.2MWp. Her estimate has

overstated the assumed provision of all consented renewable energy output by over 203MWp (or 60%).

3.7 Taking the Solar PV capacity consented over the last decade, on the basis of these figures I estimate that the true estimate is 305MWp rather than Ms Whitfield's far higher estimate of 503.3 MWp. Her estimate has overstated the estimated provision of all consented Solar PV output by a similar amount of 198MWp (nearly 65%).

3.8 I therefore conclude that whilst there has been a contribution towards renewable energy generation in the District, which has very largely in the form of Solar PV schemes, this contribution has been seriously over-estimated in Ms Whitfield's Proof of Evidence.

4. CONCLUSION

- 4.1 In conclusion, I have considered Ms Whitfield's evidence on energy related schemes granted consent over the previous decade, and this does not alter the views I expressed in my original Proof of Evidence.