

Comments for Planning Application 23/01837/FULM

Application Summary

Application Number: 23/01837/FULM

Address: Land To The West Of Main Street Kelham

Proposal: Proposed ground mounted photo voltaic solar farm and battery energy storage system with associated equipment, infrastructure, grid connection and ancillary work.

Case Officer: Amy Davies

Customer Details

Name: Averham Kelham and Staythorpe Parish Council

Address: 43 Kelham Road Newark On Trent NG24 1BU

Comment Details

Commenter Type: Organisation/Other body

Stance: Customer objects to the Planning Application

Comment Reasons:

- Object

Comment: Averham, Kelham & Staythorpe Parish Council wishes to object to the planning application number 23/01837/FULM - Solar Farm & BESS on Land to the West of Main Street Kelham on the basis of the following:

Currently there is no strategic plan in place either Nationally or locally as to how the Government or Local Authorities wish to deal with the overall development of "green energy" solutions in the drive toward net zero. The danger in the short term is that the energy sector at the moment is akin to the wild west with these 3rd party energy companies, backed mainly through venture capitalist organisations, leading the charge to develop project at the lowest capital cost and maximise profit with total disregard to the long term future and at expense of local communities. Until National and Local Plans are fully formed and in place all 3rd party developments such as this should be put on hold, a point that has been echoed by our Local MP and the Leader of Nottinghamshire County Council. It is also the belief that these developments are all linked to form part of the larger GNR proposal and the developer is exploiting the existing loopholes and blinkered approach of NSDC in regards planning process to push these various applications through piece meal and thus avoid a full planning process or scrutiny.

The proposed development by virtue of its scale, size and design, proximity to adjoining dwelling houses and conservation area would have a harmful and significant detrimental impact to the local landscape character and amenity on the village of Kelham and surrounding communities and therefore represents an unsustainable and unacceptable form of development. It should also be noted at this point that in the experience of the councillors, these types of developments will be permanent. The documentation currently states that panels will be replaced, as required, in order

to extend the current life expectancy from 25 years to 40 years. Once the 40 years have elapsed then the technology will have improved and panels will continuously be replaced as is currently done with wind turbines.

As with other proposals in the local area the applicant is seeking to gain advantage of the current lack of a National and Regional strategy by limiting the size of this development to 49.9MW in order for the scheme to be determined by the Local Authority as opposed to the Planning Inspectorate.

The proposed development does not comply with National Planning Policy Framework, which is a material consideration, along with other key Core Strategy and Spatial Policies including Development in the Open Countryside and Pollution and Hazardous Materials.

Loss of amenity / character of locality (TW10 classified area) overbearing development in relation to village size. The proposed development does not fit the requirements set out by NSDC's own policy TW PZ 11 that stipulates the areas covered by this policy should be conserved and developments should be in keeping with the existing surroundings. Previous developments in the immediate area have been refused, an example being 18/00745/FUL. The application was found to be contrary to Spatial Policy 3 (Rural Areas) of the adopted Newark and Sherwood Core Strategy and Policy DM8 (Development in the Open Countryside) of the adopted Allocations and Development Management DPD which together form the Development Plan as well as being contrary to the NPPF which is a material consideration. This proposed development would also be contrary to these criteria.

The development would result in the loss of very good and good grade agricultural land as defined in the application documentation. The Design & Access Statement indicates that 65ha of agricultural land would be taken up by the solar farm and battery storage, increasing to 71ha with below ground cabling. With reference to the soils classification information it should be noted that a total of 92% of the 65ha of agricultural land falls into Class 2 and 3a, 55% and 37% respectively, of the remaining areas 5% is Class 3b. Given the current situation regarding the Government's desire to achieve food security for the UK, taking viable agricultural land out of production would not be an appropriate decision. The loss of this land for a 40 year period would be harmful to the aims of delivering food and non-food crops and sustainable food production.

In relation to the loss of agricultural land the applicant is at great pains to point out the, supposed, number of households for which energy will be provided. What is not taken into consideration is the amount of households affected by the loss of food production over the proposed 40 year lifetime of the solar farm and BESS.

In attempting to demonstrate the green credentials of solar farms only a partial story is told. In order to fully prove such claims a whole lifecycle exercise should be considered taking in all aspects of the project. This should include the basic raw materials and components, what they

are, how they were obtained and from where e.g. mined overseas and imported, sourced locally etc. energy used in the manufacture of those components, the delivery and construction process, costs during the life of the project and energy and cost of removal once past its operating life. It is therefore questionable as to how green these projects actually are if at all?

Solar Farm projects are potentially stacking up huge issues for the future. Currently the first generation of solar panels are reaching the end of their life expectancy and having to be replaced, the issue being that these panels are not recyclable. What will happen in the future and who will bear the cost when these schemes are decommissioned, will it be the companies who have built these projects or will it be a legacy left for local Councils and Government to deal with when the developers have long disappeared?

The cumulative effect of this development would have a devastating effect on the parish of Averham, Kelham and Staythorpe now and in the future. Within a 5km radius we already have a main line railway, power station, National Grid substation, 400kv, 132kv and 32kv transmission equipment, pylons and overhead cables and Ollerton Road wind turbines. Slightly further afield there is Grange Solar Farm, Cotham Lane Solar Farm and Newark Wind Farm. This list does not include the recent schemes submitted for Muskham Wood, Knapthorpe Lodge and BESS facilities at Staythorpe and at Averham. In addition to this information has recently been circulated regarding the proposed application for the GNR Solar Farm and Energy Park, an 800 MW scheme. The prospect of all or some of these coming to fruition would have a permanent and devastating effect on this and surrounding parishes unless kept in check.

The topography of the proposed site would best be described as "crowned" with the highest point of the crown being, generally, down the middle of the site. In order to maximise the efficiency of the solar arrays they will be required to be set at the same or similar level. Given the topography to achieve this the site will be required to be excavated down to a common level, which will involve significant volumes of topsoil and subsoil to be excavated, this raises considerable concerns. Firstly the lower areas surrounding the "crowned" portion of the site are susceptible to frequent events of flooding over the course of the year. The lowering of the levels across the site will only result in a greater degree of flooding over a wider site area, however the consequences of flooding in the future will only be greater especially given similar rainfall events that we have experienced in late 2023/early 2024.

Additionally, in relation to the reduced level excavation required, large volumes of topsoil and subsoil will require removal. What is not clear from the documentation is what, subsequently, happens to these quantities once excavated? Will the fertile topsoil be re-spread once construction has completed, will surplus sub soil be stored on site or removed, if removed how will it be dealt with etc. and how will all of this impact on the general condition of the site in the short term and subsequent long term especially given that the majority of the site is currently classified as Class2 and 3a.

In relation to the number of proposed schemes the Parish Council would query the available capacity at the National Grid substation at Staythorpe and whether it is sufficient to support all or some of these applications? This question is fundamental to the decision making process and has been posed on numerous occasions however no answer has been received to date. No schemes should be considered for approval until this information has been made public.

The loss of the landscape character and rural nature of the local area given the legislative requirement to protect the existing nature of the area, its local conservation areas and heritage assets is unacceptable and against Local Policy.

The BESS element of the proposal represents a huge fire risk given the nature and composition of the batteries used to store energy. As has been previously experienced up and down the country, battery fires will start through overheating of the battery causing breakdown of the battery structure and the resulting fire created in one cell will create a chain reaction, known as thermal runaway, through the rest of the battery cells. This can effectively burn for days or weeks, reigniting even when it is considered to have been extinguished. Until it can be controlled, which is very difficult to achieve, it will emit gasses that are toxic and carcinogenic to human and animal life. Given the obvious and emerging fire risk it is inappropriate to site such developments in such close proximity to residential areas. Whilst it has been noted the existence of a fire suppression system is suggested within the proposal it should also be noted that, through existing reports that exist in the public domain, such systems do not effectively deal with the fire situation or go any way near to preventing explosion. In fact, existing reports have concluded that this approach has contributed to the resulting explosion.

It should be noted at this point that the BESS side of this application is not actually linked to the solar generation capability of this application, therefore the Parish Council would question further the supposed green credentials of this project. The BESS element will therefore not seek to harness and store the output of the solar farm to improve efficiency, it will be taking generated electricity from the closest source, this being Staythorpe Gas powered CCGT station.

In addition to the aforementioned fire risk the environmental impact of a fire would be catastrophic. There is no effective way of controlling a lithium battery other than dousing with copious amounts of water in order to keep temperatures under control, bearing in mind lithium does not require oxygen to burn once ignited. Such runoff would contain hazardous chemicals that would pollute land and local watercourses in addition to the toxic gases given off. As has been noted in previous BESS fires that once water was applied to the battery fire, the resulting run-off contained Hydrofluoric Acid (HF), a highly toxic substance which can dissolve concrete and whose fumes can be fatal to life, both human and animal. It would also call into question as to whether there is a water supply of suitable capacity to deal with such an event. Additionally the proposed BESS facility is located next to and or adjacent to local water courses and areas allocated for flood compensation. These feed directly into the adjacent river Trent so any event would have a major

impact, not only, on the immediate areas but areas further afield. The applicant has not addressed this element in sufficient detail to understand fully how they propose to effectively manage this risk.

With the installation of solar panels at low levels brings the resultant effects of glare and reflection/refraction from sunlight hitting these panels. It is not clear from the application the direction and exact elevation of these panels and also no survey has been completed to understand the outputs resulting in the effects of glare. The A617 is a major road within the area that carries a high volume of traffic. This area has also seen a large number of crashes with some resulting in fatalities. The effects of low level glare coupled with the already neglected state of the road surface will cause further incidents and fatalities resulting in more delays and road closures. It should also be noted that there is a small private aeroplane runway in close proximity to the site which appears to have been given little consideration in relation to glare.

Given the many unknown impacts from, what is, an unregulated and unproven technology there are too many demonstrable and significantly adverse impacts on the local area, its residents and the wider community for this to be an acceptable scheme for approval. Fire Authorities up and down the country have voiced their concerns regarding the current proliferation of such schemes, their associated dangers and levels of risk to public health and safety.

Given the above the Parish Council considers that the development represents an unsustainable and unacceptable form of development and is contrary to the following, but not necessary limited to, Spatial Policy 3 (Rural Areas), Core Policy 9 (Climate Change), Core Policy 12 (Biodiversity and Green Infrastructure 2nd bullet point [conserve biodiversity] of the Amended Core Strategy (Adopted March 2019) and Policies DM4 (Renewable and Low Carbon Energy Generation), DM5 (Design), DM8 (Development in the Open Countryside) and DM10 (Pollution and Hazardous Materials) of the Allocations & Development Management Development Plan Documents (July 2013), in addition to the National Planning Policy Framework which is a material consideration.

Whilst the Parish Council fully understand the need for renewable energy and is supportive of the Government's legally binding target to reach net zero emissions by 2050, and the role the local Councils should play in supporting this initiative, the Parish Council does not believe this should be at the expense of open countryside when other brown field or previously developed sites are available.