

Final Letter of objection from Bolnhurst & Keysoe Parish Council to the proposed East Park Energy Solar and Battery Storage Project (BESS), (EN010141)

The Parish Council represents 320 homes / 721 residents

Summary

The Parish Council strongly objects to the proposed East Park Energy Scheme asking that the Planning Inspectorate recommend refusal.

The Parish Council has followed the examination process closely and attended a number of the public meetings. The Parish Council applauds the Examiner for his careful scrutiny. Overall, The Parish Council believe that the applicant has not demonstrated the degree of professionalism and knowledge required for such a large-scale project and note that they have no prior experience in such huge projects. There have been many errors and misrepresentations identified in their application, for example the greenhouse gas calculations, and this does not fill us with confidence. The Parish Council also believes that they have failed to respond in a satisfactory way on many of the requests from the examiner, or on points raised by the public and its representative bodies. All too often at the meetings the applicants responded by reading pre-prepared answers that were a "best fit" for the question asked but failed to actually answer the specifics of the question.

The Parish Council is also very concerned that the plans, as submitted, contain many aspects which are only 'indicative' without proper design details, or with caveats such as; "...where it's safe to do so.", or "...where possible", or "...as far as is practicable", all of which can be used to give the applicant freedom to act in a way, detrimental to the community, if the Development Consent Order (DCO) is granted and potentially then make changes and implement designs without any public scrutiny.

Our key reasons for objection are as follows:

Scale of the Scheme

The scheme is circa 1,900 acres, over four zones, six miles long embracing six small villages, including the Parish of Bolnhurst and Keysoe which, if then added to the schemes already built or that have now been approved, will become over 3475 acres of solar projects. This in an area of rural North Bedfordshire and Cambridgeshire traditionally known for its unspoilt countryside and food production.

Loss of Best and Most Versatile Agricultural Land (BMV)

74% of the East Park Energy site is classified as 'Best and Most Versatile' arable land being Graded 1, 2 and 3a. This conflicts with the government's stated guidance and policy that BMV land should be avoided. This is particularly relevant following this week's report by the National Audit Office stating that disruption to Britain's food system was becoming more likely and potentially more severe. In addition, the new Prime Minister has stated that "Food Security is National Security". The loss of 1900 acres of farmland based on the 74% BMV is the annual loss of circa 4550 tonnes of wheat or 25,530 tonnes of potatoes - this is equivalent to the calorific needs of 15,000 people for a year.

Proximity to Residential Homes

The Parish Council also believes that the impact on local homes is unacceptable, especially for those along the B660 in the north of the village, as well as Lodge Farm and Penhazy (Kangaroo Corner). The scheme proposes panels extremely close to these homes, and this will have a significant mental and visual impact on the homeowners and residents.

Loss of Natural Countryside and Changes to the Landscape. Loss of wildlife. Loss of amenity.

The scale of this proposal will totally change the look and atmosphere of North Bedfordshire, an area often referred to as the North Bedfordshire Wolds. It is an area used by locals and many groups from across the UK in pursuit of their Duke of Edinburgh awards and offers unspoilt walks across open fields and a real sense of tranquillity. Of the thirty-seven Footpaths and Bridleways, eleven are in the Parish of Bolnhurst and Keysoe, which meander through the fields and woodland, and are beautifully maintained by the local farmers. These will become corridors between mesh fencing and planted hedging so even after 40 yrs the openness will never return, and the area will be ruined for ever. This loss of openness and freedom to walk will have significant mental implications on those that currently enjoy this amenity. The construction phase will almost certainly drive wildlife out of the area and some species may be slow to return, if they ever do. It should also be taken into consideration that this area is home to many Great Crested Newts, a protected species and one that needs specific attention which The Parish Council does not believe has been actioned

Planting and Screening

The proposed planting scheme is, the Parish Council believes, inadequate and just the cheapest option. The proposed use of 18-inch whips will mean it's many years before any effective screening is in place. With the scale of this scheme and the period of build, the applicant must be forced to plan ahead, work with growers and then plant 4ft trees and hedging at an appropriate density, and ensure that these are regularly watered during the first two summers. This will dramatically reduce the time to reach "reasonable screening"

Visibility and Creation of New Skyline.

The massive scale of the scheme will be visible from many points in the locality and for miles around, particularly the panels on the Western Ridge which will be very visible with the sun glinting off them. This will have a serious impact on the homes on Mill Hill and along Church Road in Keysoe as well as on the heritage Parish Church of St Mary's, Keysoe.

The panels on the western ridge of zone A (alongside Bridleway 37) - this being the highest point in the area - will create a new ridge and change the skyline with panels and glint seen from many miles away; this despite the claim by the applicant that they have moved the panels back by 50m, which does nothing to offset the visual impact.

Construction Impacts and ongoing maintenance through the life of the Project

A great deal has been written about the construction phase and its overall management. The Parish Council remains very concerned at the sheer scale and numbers involved and how the impacts will be conditioned and then managed. We are also concerned that there will be inadequate enforcement should the contractor not abide by the conditions. With over 800 staff arriving and leaving the site daily, thousands of haulage movements of panels and materials on large HGV vehicles, it will require regular and strict enforcement to ensure only the agreed routes and access points are used, as well as sticking to acceptable working hours, avoiding litter and general road conditions/ cleanliness, and acceptable noise levels from the constant piling for the supports for over 700,000 panels.

It must also be stressed that the traffic and working conditions applied to the initial construction must remain in place

across the life of the contract, and be amended where appropriate, so that they cover the traffic and working conditions for all cleaning, maintenance and, most importantly, panel changes required at intervals during the project life.

Efficiency and Projected/Claimed Output

Due to the local climate and the need to position so many panels on north facing slopes, it is estimated that an average output of 40MW will be achieved from the stated 400MW scheme which shows it to be a very inefficient scheme. This is not the best use for such fertile land and does not justify the loss of countryside and the negative impact on the area and its residents. The Parish Council also still believes that the proposal does not comply with the principle of good design and sustainable development as defined by the National Policy Statement for Renewable Energy Infrastructure (EN-3) and the Overarching National Policy Statement for Energy (EN-1)

Archaeological Damage

The finding of the new substantial Roman town at Great Staughton is a significant archaeological discovery and has not been fully explored. The applicant says more exploration will be done after the DCO is granted – this is totally unacceptable. The Parish Council feels there is significantly more to be found and investigated over this large site and the changes already offered by the applicant go nowhere near far enough to ensure no future damage to the archaeological assets. The Listed Buildings and Conservation Areas Act, 1990 and NPPF section 16 requires great weight to be given to conserving heritage assets. Designated assets, like the Roman town, have the highest protection and any harm or even risk to these is a serious matter and needs to be given the appropriate weighting in the examination.

Vegetation Management, Re-Wilding and Fire Risk

The Parish Council is also extremely concerned for the future of the plant life in the area and how the vegetation across the area will be managed. The proposal to use sheep will not work and there are no examples of it being effective or with the necessary markets anywhere in the East of England. The whole area risks becoming a wilderness of weeds, thistles, ragwort and other overbearing and airborne seeded weeds.

If it is not correctly managed, with binding agreements, the areas under and around the solar panels will become overgrown and areas of unwanted weed growth which in turn will spread to the homesteads in the area and to the fields with horses and farm animals. Common Ragwort in particular, is a very dangerous plant for horses, cattle and sheep being classified as an injurious weed (Weed Act, 1959).

This summer has also demonstrated the risk of wildfires where there is increased vegetation and areas of rewilding, as these have often been where the worst countryside fires have raged. With a lot of dry vegetation, the spread of a wildfire has been very difficult to control and with the proximity to residential areas this brings another unacceptable risk.

Battery Energy Storage System (BESS) Concerns

The proposed large-scale lithium-ion BESS is another area of key concern in that the applicant is stating it has not yet completed its design and specification with this ever-changing technology. This is an example of where the examiner and local authorities are being asked to approve something that they have been unable to fully review. This must not be allowed, since for such a major element, with known major risks associated to it, to not undergo full public scrutiny is totally unacceptable.

The Parish Council also understands that the site of the BESS is close to a major gas pipeline and that the gas company is seeking a significant bond in case of a problem - this must be because they have concerns and this too is a real issue for us.

In addition, the fact that the applicant has failed to secure an input licence (Grade 1 offer only) to be able to trade with the BESS potentially has a material financial impact and has led to further concerns as to the viability of the scheme.

Developer Credibility and Future Commitments

The application has been made by Brockwell Storage & Solar Ltd (BSSL) who have not impressed or shown the same degree of professionalism as some of the other developers who are building solar in the area. They have no previous experience of managing or constructing a major solar scheme and, as already stated, their application contains many errors and misrepresentations as well as their failure to fully respond to the Examination. The quality of their local engagement was very poor and it now appears that they can't even resolve differences with the existing solar farm operators at Pertenhall.

Their application has been reviewed by many experts and errors have been identified, for example the Greenhouse Gas calculations, the haulage and transportation trip numbers, the water requirements and the labour requirements for the maintenance and panel changes at year 20. These raise serious concerns as to the overall accuracy of their workings, the appropriateness of the site selection and scheme overall and potentially the actual financial viability of the scheme.

Our concern is that should a DCO be granted then the project will be sold on. How will any conditions be maintained? How will any agreed community fund be guaranteed? And how, after 40 years, will you guarantee a full decommissioning and return to rural countryside?

What Happens in the Future

The Parish Council is very mindful, as is our duty, of the future of our Parishes and the families who will be living here and thus want reassurance that when the temporary solar farm is decommissioned it will be done in a sympathetic way restoring our beautiful countryside.

The applicant has made many assumptions about the recycling of the panels within 100km of the site – but there are currently no facilities to do this. With the number of solar schemes being built there could be some 30,000,000 panels to recycle within 20 years, if the panels only have a 20 year efficient usage cycle. How long will it take? Will they have any value and what are the risks?

The Parish Council believes there needs to be a significant bond in place to ensure that there is the money to complete the decommissioning and restoration at the end of 40 years.

Bedfordshire will be Overstretched

The Parish Council remains very concerned that the Bedfordshire area is at severe risk of being overwhelmed from the cumulative effect of different NIPS projects in various stages of development. This includes the following which may be under construction at the same time if this project DCO is granted:

- East West Rail
- Tempsford New Town
- Universal Studios
- Luton Airport Expansion

- Other Solar Farms and BESS plants

The adverse consequences include cumulative impacts, such as on local roads, local housing and amenities, local services and even the loss of availability of accommodation for tourism that will be of a far greater magnitude than a single project happening in isolation.

The area will be transformed into an industrial hub, with the complete loss of heritage and landscape, as well as the food security that this part of the UK is key to providing.

The impacts for each project must not be assessed in isolation but in a way that understands the combined overall effect. In conclusion, Bolnhurst & Keysoe Parish Council strongly objects to the proposed East Park Energy Solar and Battery Storage Project (BESS), (EN010141) and urges the Examiner to reject the application.