

## **Feckenham Parish Council Objection to W/23/00270/FUL**

Feckenham Parish Council (FPC), as a Statutory Consultee, have carefully considered Application W/23/00270/FUL for the construction of a 49.9MW Solar Farm and Battery Energy Storage System (BESS) by JBM Solar. The proposed facility would occupy 287 acres of agricultural farmland at Earls Common Road Stock Green. It would be connected by underground cabling to the National Grid-owned District Network Operator substation in Feckenham. The cabling would cross the southern part of FPC's designated parish locality and run adjacent to Feckenham Wylde Moor Nature Reserve, a designated Site of Special Scientific Interest (SSSI). It also crosses the national high-pressure gas main near the SSSI.

FPC has conducted a public consultation about this Planning Application in Feckenham; we have also liaised closely with our three neighbouring Parish Councils. Based on these processes, FPC strongly objects to JBM Solar's planning application. Moreover, we highlight that our views are the same as those of our neighbouring Parish Councils and their residents. Thus, our united objections can be summarised under two headings: -

1. General Objection to Solar Farm and BESS Facility themselves and JBM's purported justifications.
2. Specific Objections to the application relating to the installation of cabling connected to the Feckenham substation.

### **1 General Objection to Solar Farm and BESS Facility themselves and JBM's purported justifications:**

Objections from the three neighbouring Parish Councils and their residents are summarised below; FPC fully concurs with these views and reasons.

#### **a) Harm to the landscape and visual impacts:**

- If approved, the proposed development would inappropriately and permanently change and dominate the landscape's character within and around the site, clearly seen from many public viewpoints.
- The proposed development site is predominately rural and has many footpaths and bridleways that traverse it. We do not consider that the Planning Application correctly recognises the impact of the proposed development on such public rights of way, nor does it contain any meaningful assessment of the same.
- We submit that the proposed development does not meet the conservation and enhancement aims of planning policy, including SWDP 25 of the South Worcestershire Development Plan (2016) nor the National Planning Policy Framework (2021) requirements.

## **b) Harm to heritage and cultural significance:**

- The installation and operation of a large power generation station is unacceptable industrialisation of the local area.
- The site is also surrounded by listed buildings and other heritage assets, an integral part of the setting which pertains to the open farming countryside. This area is particularly significant as a rare surviving distinctive and irreplaceable landscape, which has inspired important cultural touchstones.
- We submit that the proposed development does not accord with the conservation aims of planning policy, including SWDP 6, SWDP 21 and SWDP 24 of the South Worcestershire Development Plan (2016), nor the requirements of the National Planning Policy Framework (2021).

## **c) Agriculture use of the land:**

- We consider that references in the Planning Application to the ability to graze livestock alongside the proposed development may risk misleading decision-makers.
- The Planning Application provides no concrete reassurance or assurances about the provision or retention of any agricultural use of the site. It is particularly difficult to see how such an extensive array for a power generation station, with no interposing fields, could be used effectively for livestock.
- We submit that the proposed development does not accord with the aims of planning policy or guidance, including the Renewable and Low Carbon Energy Supplementary Planning Document, nor the requirements of the National Planning Policy Framework (2021).

## **d) Noise:**

- The site of and the area surrounding the proposed development has a tranquil noise climate that the construction and operation of the proposed development would unacceptably pollute.
- We submit that the proposed development contradicts Policy SWDP 31 of the South Worcestershire Development Plan (2016) and Paragraph 174 of the National Planning Policy Framework (2021).

## **e) Ecology and biodiversity:**

- The proposed development may adversely affect several important habitats, ecological receptors and networks, including the Roundhill Wood Local Wildlife Site.
- We submit that the potential losses posed by the proposed development are not justified, and the proposed development does not accord with the conservation and enhancement aims of planning policy, including SWDP 22 of the South Worcestershire

Development Plan (2016) nor the requirements of the National Planning Policy Framework (2021).

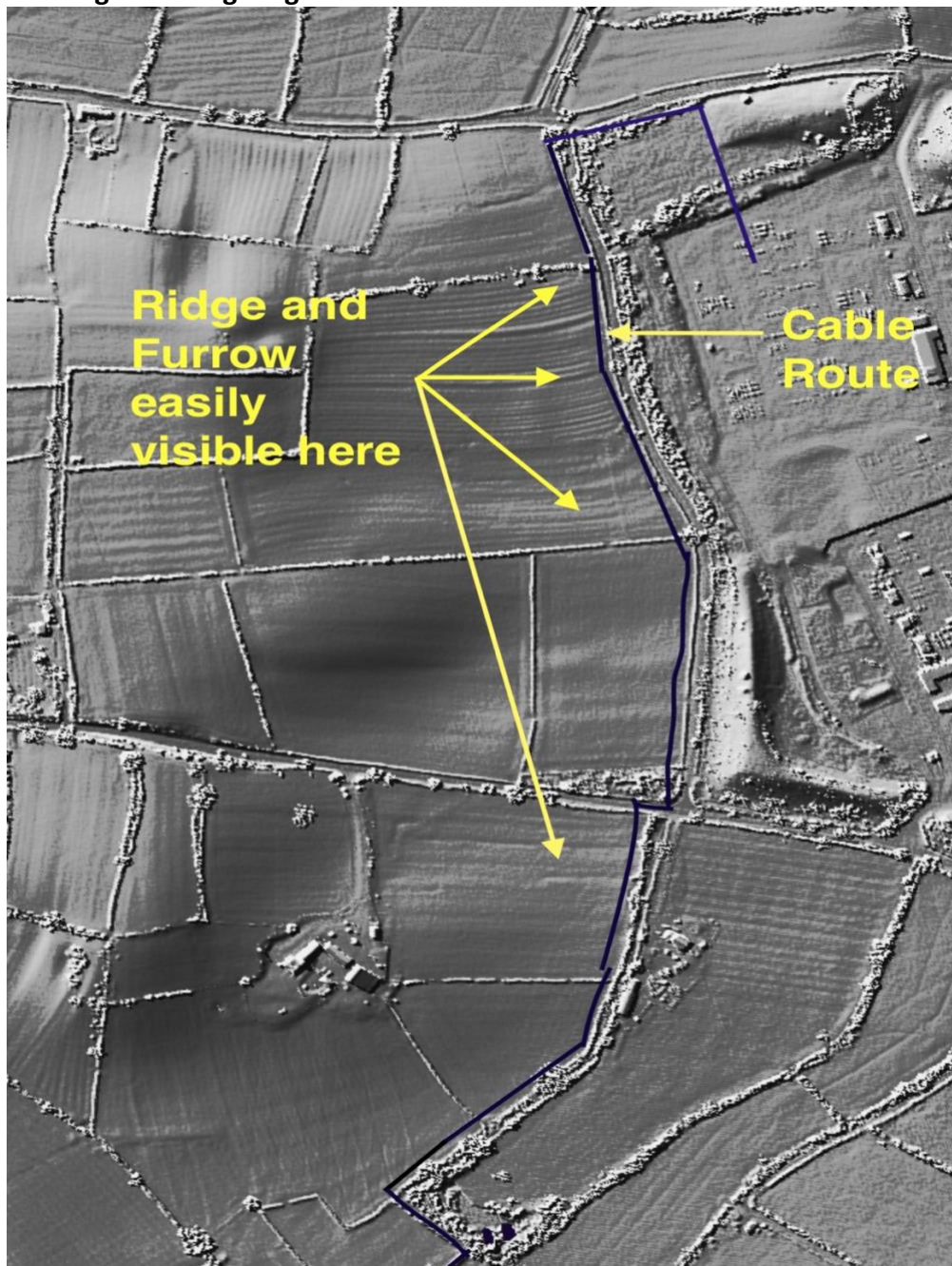
## **2 Specific Objections to the application relating to the installation of cabling connected to the Feckenham substation:**

Whilst FPC appreciates that Wychavon Planning Authority is in contact with the Redditch Planning Authority, it is unclear whether a separate planning application should be lodged in Redditch for the component of this scheme located in or near Feckenham. Specifically, FPC notes that the plans include at least one sizeable building, which will be added to the Feckenham Substation (denoted DNO substation building). In short, we question whether Wychavon has the authority to determine planning consent for the installation of the cabling and the building housing the connection to the National Grid. Notwithstanding this procedural point, we object to the following issues specifically relevant to the Feckenham component of this application:

- a) The grid connection route would be extremely close to the Feckenham Wylde Moor Nature Reserve SSSI. The necessary cabling and construction work needed to install it might harm the SSSI. The absence of detailed information about this significant possibility in the application is highly unsatisfactory. It also needs to be clarified whether less harmful alternative routes for the cabling have been considered. FPC believes that the application should be refused without this required information.
- b) The application details a construction method for installing the cabling, which includes a 1.6m deep trench approximately 700mm wide within a construction boundary of 10m extending the length of the entire cable (4.5km). It estimates the construction process will require ten construction vehicles daily over five weeks, some of which will pass down Moors Lane. FPC considers this timetable to be highly optimistic, and, in reality, the disruption caused by construction will be much more significant. FPC draws attention to the fact that Moors Lane is a private road and public Bridleway, which is currently in an abysmal state of repair; heavy construction traffic could only make this situation much worse. To use Moors Lane for access, the applicant would need to secure consent from all its owners, and this is unlikely to be forthcoming without a formal agreement from the applicant to fully fund the complete rebuilding of the entire lane with appropriately constructed foundations covered by new tarmac, following the completion of the cable laying process. Use of Moors Lane by construction vehicles could also pose a danger to pedestrians, horses and other farm animals using the Bridleway. If the use of Moors Lane for construction cannot be agreed upon with its owners, then all the construction traffic would have to traverse open farmland, which vastly increases the potential damage to Ridge and Furrow assets (see below).
- c) Page 15 of JBM's initial EIA Screening Report states that the site would not be in the Green Belt. This is incorrect, as all the land north of the B4090 is designated Green Belt.
- d) The agricultural landscape around Feckenham contains many surviving examples of historic Ridge and Furrow soil formations, designated as important heritage assets

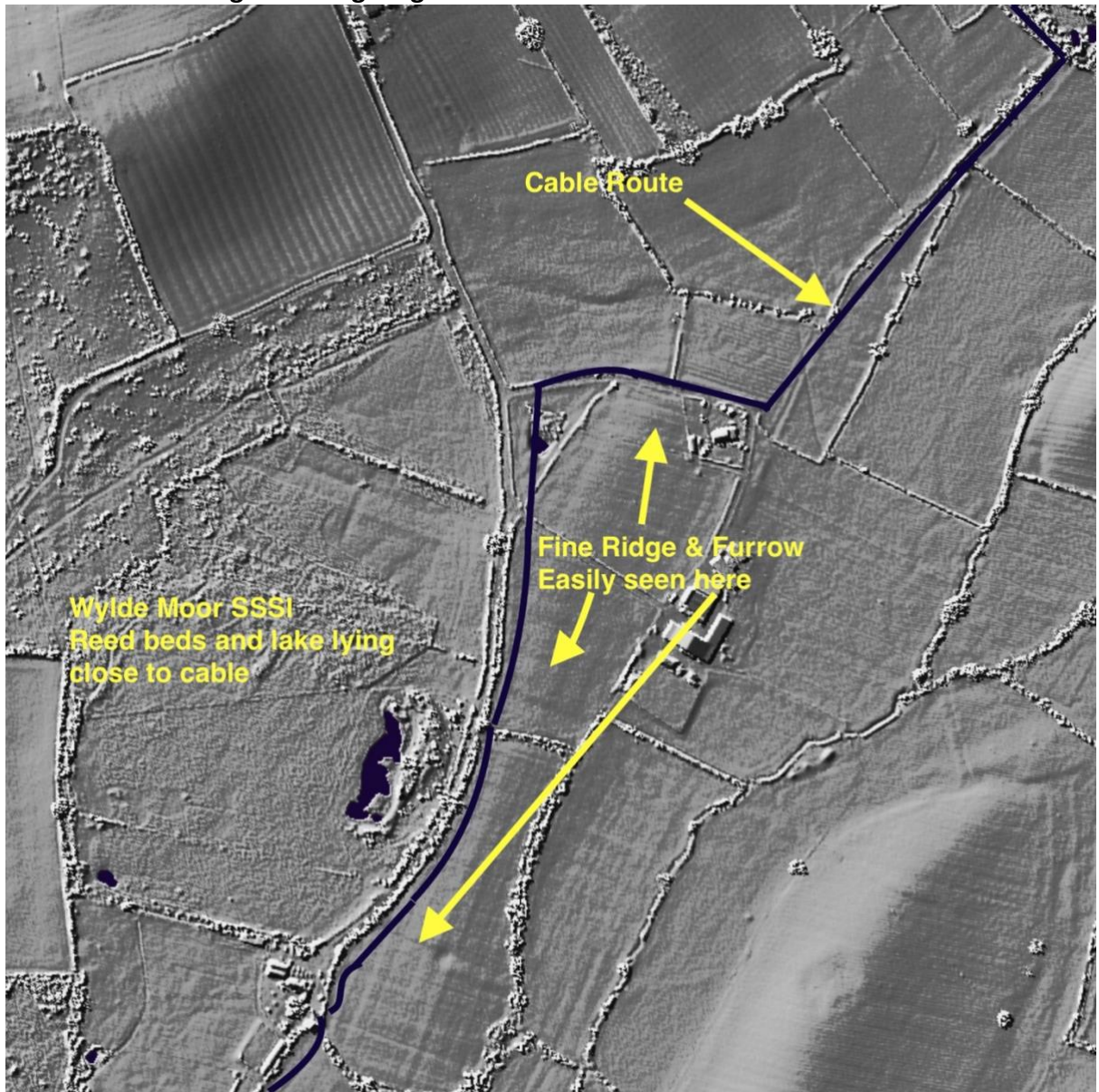
mentioned in the Worcestershire Historic Environment Record. Specifically, these soil formations help with the understanding of Feckenham's Moated Manorial Site, which, in turn, is a Scheduled National Monument. The applicant's submitted plans, EIA Screening Report, and heritage documentation make only passing mention of these important heritage assets and specifically discount their importance with the claim that the Ridge and Furrow are now highly degraded on the ground and, therefore, of no value. We strongly disagree with this fallacious assessment and reproduce below recent LIDAR scans showing the historic Ridge and Furrow artefacts in relation to the proposed cabling route. We identify on these images several sites of high heritage importance where the Ridge and Furrow are still easily visible and where the cabling installation will inevitably cause irreversible damage.

**Lidar Image showing Ridge & Furrow near Feckenham Substation & to the South**





Lidar Image showing Ridge & Furrow near Cable and Wild Moor SSRI



- e) The cabling and its installation will likely seriously harm these heritage assets, contrary to the Redditch Development Plan policy and NPPF, and this planning application should be refused accordingly. We also note that the applicant still needs to consult Historic England, which we believe is a requirement with Ridge and Furrow assets associated with a scheduled national monument. We also note that other planning applications in the Feckenham area and elsewhere have recently been refused because they could harm Ridge and Furrow assets.
- f) Lastly, there needs to be more detail on how the necessary electrical connection cabling will cross the national High-Pressure Gas Pipeline infrastructure located south of Feckenham. There may well be nature, heritage, or archaeological problems dependent

upon where the cabling crosses this gas supply. It is an essential and compulsory legal requirement for JBM to consult with the relevant Gas Authority on this matter. The entire project can only proceed once this issue has been satisfactorily and safely resolved.

## **Conclusion**

Feckenham Parish Council objects to Planning Application W/23/00270/FUL for the abovementioned reasons. We, therefore, respectfully request that Wychavon District Council Refuses Planning Permission. Redditch Planning Authority has also been asked to comment on this application. FPC requests that the Redditch LPA refer this matter to the Council's Planning Committee for public debate and comment before formally responding. Accordingly, FPC intends to make representations to Redditch Planning Committee objecting to this planning application in due course.

11<sup>th</sup> April 2023

Cc Ruth Bamford, Head of Planning  
Redditch Borough Council