

# STOCK and BRADLEY PARISH COUNCIL

## RESPONSE/COMMENTS TO SOLAR FARM PLANNING APPLICATION W/23/00270/FUL

### EARLS COMMON ROAD, STOCK GREEN/STOCK WOOD

This proposed 287 acre development is located between Roundhill Wood Stock Green, Stock Wood and Dormston. Whilst the proposed development is entirely within Inkberrow Parish it abuts the boundary with Stock and Bradley Parish and the majority of houses directly affected by the scheme are in Stock and Bradley Parish. It is the largest planning application the parish council have ever been asked to comment on and has been discussed at several Stock and Bradley Parish Council meetings always with the public present, including one, on 17<sup>th</sup> March 2023 called specifically to hear its residents views. Among Stock and Bradley residents present there was complete opposition to the scheme. Our local MP Rachel MacLean carried out a survey of the local residents to ascertain their views and 94% were opposed the scheme.

At its meeting on 28<sup>th</sup> March 2023 Stock and Bradley Parish Council voted to **OBJECT** to these proposals for the principal reasons listed below. We urge the planning committee of Wychavon District Council to refuse permission for this proposal.

#### **1) ENVIRONMENTAL ISSUES.**

The land within which the proposed site sits is a tract of unspoilt gently rolling farmland bounded by Roundhill Wood to one side, the village of Dormston with it's part 14<sup>th</sup> century church to the other and Inkberrow and Stock Green villages not far away. There is an open vista of the Malvern Hills to the south west. As one would expect in such a habitat there is a varied and rich flora and fauna. There are no major road or other accessways crossing the area just lanes and a network of public footpaths and bridleways. The proposal will completely change the character of 287 acres of this tract with fencing and solar panels

Despite it's planned 40 years life, this development will cause permanent damage to the setting of the many heritage assets near it, forever remove connections with cultural assets and harm the rich bio diversity of the area. This 287 acres is far too large for it's location and completely out of character with it. It will be a visual eyesore in an otherwise unspoilt rural area. When complete the site will be surrounded by two metre high fencing which also border the public footpaths and bridleways which cross the site. There will also be CCTV cameras and lighting. We are told that the lighting is for emergency use only but how could this be controlled? The area has a large deer population as well as many other mammals, including protected and endangered species, the fencing will obstruct free movement for these animals between say, Roundhill Wood and open pasture land. Gaps left in fencing for small mammals are notoriously ineffective.

The Parish Council believes that This contravenes the aims of The South Worcestershire Development Plan (2016) S 21,22,23 and 24.

**2) CONSTRUCTION PERIOD.** Whilst it is accepted that the construction period of six to nine months is, by its very nature temporary, it nevertheless it is likely have a significant impact on residents day to day lives, their mental health and their well being.

**Traffic:** There is no easy access to this site. This is one of the largest solar farm planning applications to date yet all the access routes to it are completely inadequate. We urge the Planning Committee to carry out a site visit of all possible access routes. This parish council would be more than happy to send a representative to accompany the site visit in order to show the members the potential routes. All access routes (including the one proposed along the A422 through Inkberrow past the school and then turning very sharp left into the eastern end of Earls Common Road) involve use of narrow country lanes some less than four metres wide where it would be difficult for a lorry accessing or leaving the site to pass any other vehicle, let alone another lorry. During term time groups of children stand or are deposited on narrow grass verges either leaving or awaiting school buses. Earls Common Road (and the other local roads) all carry large quantities of leisure cyclists, walkers and horses. The movement of the construction traffic will represent a serious danger. In addition many of the narrow lanes will require resurfacing/remaking when the construction is complete as most are poorly founded. And this route was considered by the applicants to be best of three possible routes!

**Noise During the Construction Period:** The frames upon which the solar panels are to be mounted are to be fixed in position by spikes pile driven into the ground. This process is obviously noisy. Some members of our parish council visited a solar farm under construction in Bishampton. They found the repetitive sound of the pile driving to be loud and debilitating for those living in nearby houses. The sheer number of panels means that this process will be virtually continuous for the construction period. At the time of writing consultees Worcestershire Regulatory Services had criticised the noise report prepared by LF Acoustics

‘ The report, contrary to usual good practice and the WRS Guidance, does not include any background surveys of the existing noise climate’.

**3) OPERATION OF SITE.** The parish council is particularly concerned regarding two aspects of the development once in operation:

**Noise During Operation.** A noise assessment has been prepared by LF Acoustics (file Roundhill Solar Noise v1.3 250123.pdf). In the quiet environment of the subject site, talk of ‘low’ noise levels is meaningless. The quiet of the area will mean that at night the hum from the BESS;s and inverters will affect the area. The concern of the parish council is that operational noise has been downplayed because in an urban environment where general background noise is constant, the humming would be hidden but in this location the only night time noise is that of wildlife.

**Fire Safety.** As far as BESS’s are concerned fire safety is dealt within BESS Technical Statement. A rather strange proposal by the applicants is that they agree in advance to a

condition whereby a Battery Safety Management Plan is approved by the LPA after consultation with the Health & Safety Executive and the fire service. Why cannot this be done prior to application?

The parish council is concerned concerning the following:

- 1) Why hasn't the fire service been consulted?
- 2) It is our understanding that if a fire were to break out the only suppressant is water. Where do the applicants believe such a large quantity of water could be obtained?
- 3) It is our understanding that the BESS's contain lithium-ion. If a fire were to break out and water used as a suppressant the run-off would contain hydrofluoric acid. This dangerous chemical run-off would then exit the site into the Stock Green Brook close to a number of houses at the north western end of Stock Green and potentially flooding them.

#### **4) ELECTRICITY STORAGE (BESS)**

The application form makes it quite clear that the application is not only for electricity generation but for storage of energy. It is not entirely clear from submitted paperwork whether the applicants intend only to store electricity generated on site and sell it later, additionally store electricity from other 'green' sources or simply buy in electricity from any source, store it, then sell it later.

The number of battery storage units is unclear, In the BESS Technical Statement S3.3 , 20 are envisaged but an examination of the site plan (Sheets 1-27) appears to show 42 each approximately the size of a shipping container.

Again in the BESS Technical Statement a lot of effort has been put into justifying the BESS system of storage and also the colocation of generation and storage (section 4.9) and in the Design and Access statement 3.13. but:

- i) Should the means of storage be located on agricultural land in a rural location? Would not this use be better suited to an industrial location? Would it not be more efficient to store the electricity nearer to it's eventual destination or next to the national grid itself?
- ii) In their advertising the applicants have frequently used the term 'Green electricity' when communicating with people in our parish. This is only true if the electricity stored is generated on site or is purchased from renewable sources. The Parish Council would recommend that a condition be placed on any approval restricting the import of electricity to renewable sources. If such a condition is not possible the application should be refused.

## **5) ECONOMIC LOSSES**

**Agriculture.** Grade 3b farmland is not unproductive, this site successfully grows crops every year, this year being oil oilseed rape. We understand it is producing about 3.0 to 3.5 tons per acre, not far short of the 4.5tons per acre one might expect from 'better' land.

The applicants have suggested that the land could still be used for sheep grazing once the solar panels are installed but the land would need seeding for this to happen and this would be difficult with the panels in place.

**Tourism.** At first many parishioners joked about the possibility of the area having a connection with JRR Tolkien's trilogy 'Lord of the Rings' and 'The Hobbit'. But the connections are there and the potential to plug into a rich source of income for local communities.....provided the area is not changed by covering it with solar panels!

**STOCK & BRADLEY PARISH COUNCIL**

**Date 6<sup>th</sup> April 2023**