

From: planningcomments@highpeak.gov.uk
To: [Planning Comments \(HPBC\)](#)
Subject: Comment Received from Public Access
Date: 11 June 2023 15:39:56

Application Reference No. : HPK/2023/0193
Site Address: LAND AT Marsh Lane New Mills Derbyshire
Comments by: JAMES MICHAEL WALFORD

From:
LADYPIT HOUSE
Ladypit Road
Furness Vale
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Derbyshire
SK23 7TD

Phone

Email:

Submission: Objection

Comments: Dear Sirs,

I would like to object to the above planning application HPK/2023/0193.

The reasons I object are:

¿ By definition, this is ¿inappropriate¿ development in the Green Belt; ¿very special circumstances¿ have not been demonstrated.

¿ The proposals do not fall within any of the categories of acceptable development in the rural areas as set out in Policy EQ3 of the Local Plan and the overall effect on landscape character at the site and on adjacent land would be adverse, contrary to policy EQ2.

¿ There is an inherent risk to local residents and the environment from the consequences of thermal runaway, in conflict with the principles of sustainable development. (Google: ¿BESS fire Liverpool 15 September 2020¿).

¿ Road access is inadequate to support construction of this development, increasing the danger and inconvenience to other highway users.

¿ There is no justification for these proposals at this location.

¿ Being a resident in close proximity to the proposed development this will impact on our everyday visual and acoustic amenity. The site will impose significant disruption in both the construction, operation and remediation phases of the project. I note that recent planning applications for neighbours conversion of a barn to holiday home was rejected on the grounds of increased traffic on Ladypit Road / Dolly Lane ¿ if the minor level of increase was not acceptable then sure the increase in traffic from this proposed facility would also be an-acceptable to the local planning officer.

¿ More importantly the proposed development is located on land designated as green belt which is protected from development by law. No special circumstances have been demonstrated to outweigh and enable the disregard of this protected status. No formal application documents been provided by ENWL whom we assume would be in support of the application. No information has been provided by the applicant to detail why this facility is critically needed to support the electrical infrastructure.

¿ I understand it is the normal practice of companies such as Novus is to blanket approach land owners adjacent to electrical substations to ¿test the appetite¿ of owners for leasing the land for projects such as this. The land owner is obviously happy to sacrifice the natural environment for financial gain and that is why we have the green belt status which is protected in law. I have noted that nowhere in the planning documents has it

stated the financial gain of the land owner, so much for full disclosure.

¿ At no point has it been fully demonstrated by Novus or Electricity North West that this facility is critical to on going operation of the electrical grid in Furness Vale, New Mills or other surrounding area. In fact, in review of the substation head-room and future demand report for new mills substation on Electricity North West web site it would appear there is spare capacity on the substation and therefore the local network is NOT experiencing peaks in demand which are in excess of the existing capacity and would require the battery to discharge into the local network. Therefore, no special circumstance has been demonstrated. Furthermore I am not aware of any significant development planned or submitted through the planning process which would significantly increase the demand beyond this existing spare capacity.

¿ The Environment Agency have not considered the risk of pollution released in the event of fire batteries or the release of contaminated firefighting water to the local environment. There simple email response demonstrates a poor review of the scheme and I would urge the Planning Authority to pursue a more detailed assessment and response from the Environment Agency.

¿ I note that no contact has been made with the National Parks Authority. A friend contacted the parks authority WC 05/06/2023 and the Parks Authority were not aware of the application. The Planning Authority MUST make sure this important statutory consultee has been consulted and provides a response.

¿ National Rail response identifies some significant safety and engineering issues related to the applicants proposed design. The applicants design has not fully understood the impact on the adjacent railway system and National Rail requirements for the continued safe operation of the railway network and as such the development application should be rejected. The applicant is applying for full planning approval as such I would have expected that the proposed design would have been fully co-ordinated and comply with the National Rail Requirements.

¿ Local consultation has not been undertaken fully. As a local resident we have not been contacted by Novus to talk about the proposal in detail despite being approx. 360m from the proposed site. We have received a general leaflet about the proposal which only include general information. Consultation sessions were organised during school holiday periods which exclude a whole group of individuals whom couldn't attend the public sessions, ourselves included. I would cynically say this was a ploy by Novus to report low attendance by the general public.

¿ The community engagement statement section 4.5 indicated that the personal opinions of planning officers are influencing the assessment of the proposal, this shouldn't be the case, in my opinion this development should be rejected.

¿ High Peak Borough Council (and other councils) should be insisting that new developments should include on site renewable electrical energy generation through the planning approval process therefore the need for such facilities would be greatly reduced. The need for such facilities demonstrates the failure of local planning authorities to enforce on site generation to reduce the demand for electricity. I as a local resident do not accept having one of these facilities next to me due to the failures of Planning Authorities to impose the most stringent levels of energy efficiency and sustainable design. Planning Authority's accepting financial offsets through the Community Infrastructure Levy results in project such as the proposed application which is the accumulation of deferring energy efficient, carbon efficient and sustainable design.

¿ Regardless of the ecological statement provided seeming to demonstrate that the site is of low value, it is not. As a local resident we regularly see wood peckers, hares, partridge, pheasants and other more regular country side animals. Regardless of the lip service provided in the ecology statement the noise and disruption during construction is likely to drive this wildlife away. This is another reason that green belt has protected status in law.

¿ The concerns raised over noise are still applicable. Novus have used extensive acoustic fencing and bunding. This has greatly altered the proposed scheme visually beyond that likely discussed with the DCC and HP Planning Authorities during pre-planning submission consultation. The submitted design should be carefully considered again as this has greatly affected the visual and acoustic amenity of the proposed facility.

¿ In relation to noise, I as an individual have no idea what the impact is. I'm no acoustician and the noise survey might as well be written in a foreign language. No layman's description of the likely increase in noise has been provided. I suspect the noise generated is greater than what we would be comfortable to accept and

hence no simplified description has been provided. Most times the local area is very quiet and I suspect that any noise measurements, to set any base line, have been completed at a typically noisy period to provide an artificially high back ground noise level.

¿ The proposed development includes significant earth works which will require significant works to replace back to the sites current natural state therefore there will be two periods of disruption, first to construct and then to remediate. I also have a concern that any agreement for future remediation will be forgotten about if this is required in 25years time then whom will be around to remember or know what agreements have been put in place to undertake this work. Perhaps a financial bond should be demanded of Novus upfront to protect against some change in the Novus business status (business failure, sale, re-name or some legal status change which would supersede any legal remediation agreement) ¿ who knows where Novus will be in 25years time when it comes to remediate the site.

¿ Additional traffic caused during construction, operation and remediation will have a significant impact on the local environment. The traffic control the measures suggested at Marsh Lane / Church Road are woefully in adequate and it¿s unlikely that the route through Marsh Lane / Station Road is suitable for such heavy weight vehicles. The junction at Mash Lane / Church Road is also a very tight corner and it¿s difficult to turn my car and caravan through this junction let alone a heavy goods vehicle, there doesn't seem to have been any vehicle tracking plans provided to demonstrate an easy passage at this junction. The traffic assessment also seems to ignore the Marsh Mills development. This development has currently stalled. However, "sod's law" dictates that Marsh Mills development will get going again same time as the proposed development construction period doubling the heavy good's traffic at the Marsh Lane / Church Road Junction.

¿ The junction is also a significant route for pupils attending New Mills schools on Church Road, this increase in heavy goods vehicles subsequently increases the risk of a traffic or pedestrian collision. Any collision between such large heavy goods vehicles and pedestrians (and we¿re talking school kids) is likely to result in life changing injuries or death ¿ I hope that High Peak borough council are ready for the backlash from the community if this occurs!

¿ There is no assessment of proposed developments embodied carbon. As the UK transitions to a Nett Zero Carbon economy I would have thought that this assessment would have been a requirement of the planning process? If not, it is again demonstration of a failing system. The assessment should include a ¿cradle to grave assessment¿. It would be my expectation that due to the materials (in particular rare earth metals needed for the batteries and electrical components), construction, operation and remediation activities required to provide the proposed development it would identify that this development contributes more carbon than it actually reduces!

In short, this development is not needed, The ¿critical need¿ has not been demonstrated to outweigh any disregard of the green belt status, the development is being proposed on a whim that it may be approved on the off chance there is some financial gain to be made. The constraints outweigh any benefits and it¿s being proposed to be built on a parcel of protected green belt land. And for these reasons the development should be outright rejected.

Yours Faithfully

J. M. Walford BEng.(Hons), MCIBSE, CEng.

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