

25.06.23

Kevin Thomson, Beardwood Farm, Furness Vale, SK23 7QF.

HPK/2023/0193 Land at Marsh Lane, Gowhole, New Mills.

Submission: OBJECTION

I strongly object to the planning proposal for a battery storage facility at this location for the following reasons:

Inappropriate development on greenbelt land with no very special circumstances demonstrated. The 12.6% of greenbelt land in England should be protected to combat climate change and help us to achieve net zero by carbon sequestration.

The proposal does not fall within the categories of accepted development in rural areas as set out in Policy EQ3 of the Local Plan.

This is not a renewable energy project or sustainable development. It is an industrial development utilising electricity produced by fossil fuels so it is neither 'green' or 'low carbon'. The project does not promote reducing energy use, it simply redistributes it for profit. This is then to be utilised elsewhere (Altrincham according to Novus) at the expense of our local economy, amenities and public safety. Any extra capacity available at this substation could be better utilised locally without the need for battery storage.

The method of assessing for a suitable site is questionable. What is the need for 30MW of battery storage in this location? Other substations outside of greenbelt have extra capacity for smaller developments. One could surmise, that the location was identified primarily by negotiating a contract with a willing landowner and then by attempting to justify its necessity to maximise profit.

Lithium batteries are inherently dangerous, although Novus do not acknowledge this in their application, stating that the development is none hazardous. The increasing risk of thermal runaway caused by these batteries causes unextinguishable fires, explosions, toxic fumes and water course pollution. The UK Government is presently debating the need for much stricter legislation on these battery storage developments due to their hazardous nature and health and safety concerns. Novus states that they have had talks with the local Fire and Rescue Services but why would they need to do this if it's a none hazardous development. What were the results of these talks and why have they not been publicised? Where is the fire safety management plan?

The special character of the landscape would be irreversibly damaged contrary to Policy EQ2. Noise pollution would impact the enjoyment of the area and destroy residential amenity. The area proposed is a popular walking area and surrounded by a network of public rights of way accessing the nearby Peak District National Park whose boundary is visible to the East. Tourism is vital to the areas economy and will be impacted by the development if it goes ahead. Neither does the development offer any local employment opportunities as it would be unmanned.

Marsh lane is unsuitable for heavy traffic. It is narrow with tight bends and pinch points. The junctions at both ends of Marsh Lane are dangerous. The junction in New Mills is used by schoolchildren (older children often unsupervised) throughout the day to access the sports field.

Local wildlife at the site will be negatively impacted despite the claim of biodiversity net gain. The inclusion of more trees and hedges will not provide an attractive environment for wildlife, as the change in noise levels (10.0 dB(A) or more) as stated in the Noise Assessment commissioned by

Novus around the containers would have a significant major impact, and make the site untenable. Vibration would also play a factor in degrading the habitat, particularly affecting bats and insects. Noise pollution would extend far beyond the site itself thus affecting nearby habitats. 'Bats rely heavily on their sense of hearing to survive and when noise pollution interferes with their ability to hear, their survival is at risk. Bats have been found to be less active due to noise. Their sense of hearing is superior to ours and as a result, the impact of noise on wildlife animals like these will be greater than that experienced by human beings. Animals need to communicate with each other and they do this through sounds. The intrusion of unnatural sound creates a barrier. This barrier results in much of the animal's survival geared activities (such as foraging, hunting and breeding) being limited. (How Noise Pollution Impacts Bats and Other Wildlife. Dowd,B.2019). The site falls within both of the km squares surveyed by the British Trust for Ornithology's 'Breeding Birds Survey' for over 15 years. Birds recorded in this area include 14 Red Data and 16 Amber Data species, including the globally threatened species Curlew and Lapwing. Productive farmland such as this provides vital feeding areas for these birds and other animals. The NPPF (15) states that 'In terms of biodiversity and habitats, the presumption of sustainable development does not apply where there can be significant adverse effects on habitat sites.'

Kevin Thomson

PgC/PgD/ MSc Countryside Management.