



HALE PARISH COUNCIL

Of the Halton Borough in the County of Cheshire



FAO Pauline Shearer
Planning - Halton Borough Council

10 December 2018

OJECTION TO PLANNING APPLICATION 1800513FUL - PEEL ENERGY LTD - PHOTOVOLTAIC FARM

Dear Pauline,

Hale Parish Council stand united with residents of Hale and Speke in their opposition to this controversial development.

Whilst Hale Parish Council is not adverse to Liverpool John Lennon Airport employing the use of a photovoltaic farm, it believes this can be done more successfully, offering greater energy production by incorporating this scheme into land adjacent to existing runways, which have the capacity to produce up to 60% of the airport's electricity as oppose to only the 20% outlined in this application.

For a project that should improve the wellbeing of the environment, there is little evidence in any supporting documentation to suggest the health and welfare of local residents have been factored into the proposals presented and what health impacts this planning application could contribute to following a significant loss of open space.

In consultations conducted by Hale Parish Council, this development appears at odds with the long-term aspirations of the community for access to greenspace and full enjoyment of the environment by residents and tourists alike.

Positioned within the Master Plan of Liverpool John Lennon Airport, this proposal forms part of a plan that relies upon a growth in passenger numbers. The forecasts offered by Liverpool John Lennon Airport, that form part of the justification for expansion, are not quantifiable and do not accurately reflect actual historic passenger growth. It should be noted that whilst Liverpool John Lennon Airport had predicted in 2007 their total annual traffic throughput would reach 8.3 million by 2015, this was a prediction that subsequently demonstrated an over projection of 4 million. In actual fact, there has been a loss of approximately 500,000 passengers per annum between 2007 and 2017 - with only 4.95 million passengers using the airport last year (showing not least the lack of accuracy in data provided from assessments commissioned by Peel). This dramatic loss in passenger figures was despite the construction of a new multi-level car park, the opening of three budget hotels within half a mile, and the reconstruction of the runway with ILS Category III standards.

The desired outcome of the 2007 Master Plan to attract further investment has shown little long-standing sustainability with the airport failing to attract permanent investors. The past decade shows large percentages of changes in ownership, buybacks and resales, with the Master Plan facilitating no measurable growth to the tourism, employment or prosperity of Halton during this timeframe. There is no correlation between this development and the future success of Liverpool John Lennon Airport and it has been perceived by residents as nothing more than an exercise to land-take.

Hale Parish Council finds the Alternative Site analysis submitted by Peel to be limited, inaccurate and factually incorrect. There is no supporting evidence provided to show that the siting of a photovoltaic array could not be achieved just as successfully on top of the terminal building or within land adjoining the runway. It should further be noted that the Dunlop Field site described as unsuitable for this development due to its use as a recreational facility for the local population, has since been sold by Peel to Barratt Homes. A sale that facilitated the loss of approximately 15 acres of sports fields (an area equivalent to the proposed solar site). As such, Hale Parish Council believes this document serves to mislead and request this assessment be rejected by Halton Borough Council.

Hale Parish Council are unaware of any Capacity Study or other analysis undertaken by Halton Borough Council to establish which areas of the Borough could be more suitable to accommodate a renewable energy development of this type and a report of this nature would be welcomed.

The planning application offers no regard to the importance of Green Belt and its purposes in preventing urban sprawl. As set out in paragraph seventy-nine of the National Planning Policy Framework (NPPF), "the essential characteristics of Green Belts are their openness and their permanence". With the absence of any development currently on the land, the Green Belt is currently open and unbuilt. This plan would reduce the openness and permanence of the Green Belt by occupying approximately 15 acres of land, forming a distinct feature of the site which would reduce openness in the area by domineering the area of land used by residents to access Hale Shore, offering no amenity value to neighbouring properties, the bridleway, or adjoining roads and footpaths.

Attention should be drawn to paragraph ninety-one of NPPF which states, "when located in Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed." Defined as an inappropriate development, this scheme is by its very nature, harmful to the Green Belt. Not least due to the fact that this particular parcel of land is the last remaining wedge that acts as the only buffer of countryside in between Liverpool John Lennon Airport and Hale. A photovoltaic farm on this land would destroy the essential characteristics of Green Belt, in effect merging Halton with Speke.

Hale village has maintained a rural character for centuries and this development would be a significant and irreversible impact on the landscape. The proposal is not in keeping with the Conservation Area of Hale Road and would considerably alter its approach. The site is further enhanced by the SSSI site to the south and RAMSAR site and the proposal offers to neither conserve nor enhance the character of the area and is consequently contrary to a number of planning policies included in Halton's Core Strategy.

The site as a whole provides a positive contribution to the landscape and scenic beauty of Hale. An introduction of a photovoltaic farm would introduce a commercial character to the village and require development in a currently undeveloped part of the Ward. The site is visible from a number of surrounding vantage points (including residential properties that would see their views significantly affected) and, in all of these, the proposed photovoltaic farm would be a sizeable addition to the landscape. Views of the River Mersey and adjacent Welsh Mountains visible from this site would be obliterated. Furthermore, the hard surfacing that would need to be laid to provide access to and from the photovoltaic farm would be visible from these vantage points and would be incongruous with the rural nature of the area.

The historic agricultural and recreational use of this land has been well established in local sentiments for over a century. Not only is the site wholly in Green Belt, but it has been recognised by Natural England as Grade 1 agricultural land – forming some of the ‘Best and Most Versatile’ agricultural land in the country. Hale is the only Ward in Halton (and one of only two Wards in the whole of Cheshire) to contain any Grade 1 agricultural land and the proposed development would result in a substantive loss to one of Halton’s highest-quality land parcels.

The site offers significant historical importance, once used as the only salt mine across Liverpool and Halton – an industry pioneered by the Blackburne family of Hale in the 17th century that served as the nursing mother to the rise of the flourishing trading history of Liverpool’s docklands. This land should be protected as a historical landmark, providing educational benefit and acting as a destination for tourists.

No evidence has been provided to show the significant carbon footprint that would be used to develop this proposal would offer anymore benefit to the environment than the current carbon production of the land. The invasive and aggressive drilling rigs that will be required to excavate this land would appear the antithesis of an environmentally-friendly project, as would the sterilisation of the land by the use of shale aggregate.

By its own admission, Liverpool John Lennon Airport use Hale village as a flightpath to impact the fewest number of people, the majority of the time. In an already strained setting, this application proposes to further deplete the environment of a rural community already exposed daily to high levels of noise pollution and poor air quality from low-flying aircrafts.

The Government’s Solar PV Strategy states that local communities must be willing partners in solar expansion; not just consulted, but respected and wherever possible, financial partners in local projects. This is reinforced by the Government’s first Community Energy Strategy. This planning application provides no evidence of this and would suggest that the local population and environment are expected to subsidise the debt of the airport.

The Planning Policy Guidance (PPG) points out that solar farms are normally temporary structures, with planning permission sought for only a period of approximately twenty-five years. This application includes no plan for restoring the land back to its previous agricultural or recreational use and whilst stating solar panels themselves will be completely removed, the application makes no commitment to the specific decommissioning of the entire infrastructure including:

- a) The removal of the supporting underground framework
- b) The redrawing of the micro-piles from the ground for reuse / recycling
- c) The removal and recycling of cables and ducting
- d) The removal of on-site inverters and equipment
- e) The removal of the localised concrete pads for the inverters
- f) The removal of the on-site tracks
- g) The removal of any buildings
- h) The removal of any perimeter fencing
- i) The recycling of the solar panels and the re-tasking of the materials

This land parcel lies adjacent to the vulnerable landmark of Hale Cliffs and there has been no geological assessment to show what impacts drilling would present to nearby cliffs, presenting a substantial risk that these could be undermined to the detriment of public safety if cliff collapse was to occur due to vibration from construction.

In recent years, the applicant has made very little effort to enhance the wildlife of the area, enabling surrounding land parcels to overgrow and degrade substantially.

Hale Parish Council can see no benefits to either the specific locality or society and wider economy as a whole and finds substantial harm to the character and appearance of the countryside, both alone and cumulatively with the proposed addition of industrial development. These concerns appear to out-way the benefits of the scheme, which would make only a negligible contribution to the government's commitment to renewable energy generation and therefore assist minimally in tackling climate change. Solar panels are engineered products that have an industrial appearance and take a vast amount of energy to make. As do the necessary boundary treatments to protect them. They are not, inherently, products that fit into a countryside environment, known by locals and tourists alike for its commitment to natural beauty.

This development would cause a significant burden to the local community, offering no benefits to residents, and substantially impacting their ability to access open spaces. There is significant risk to the biodiversity of the site and environmental impact. The project represents inappropriate development in Green Belt which would cause harm to the landscape character and visual amenities of the area and to the settling and significance of buildings that have existed since for many centuries.

Hale Parish Council believes the applicant has not shown existence of very special circumstances sufficient to outweigh the clear harm to the Green Belt and request Halton Borough Council consider the loss of open space and the overall impacts on residents this encroachment into the countryside will have.

Your faithfully,

Craig Wyna,
Clerk
Hale Parish Council