Application NK/2024/0613
Applicant Name: First Renewable Developments Ltd
Location: Kettering Energy Park, Burton Wold Wind Farm (land adjacent to), Thrapston Road (land West of), Burton Latimer
Proposal: EIA Scoping Opinion for development of energy infrastructure, structures to accommodate advanced agricultural systems and new employment floorspace and associated works
Application Type: Environmental Statement Scoping Opinion

North Northamptonshire Green Party (NNGP) OBJECT to this application for the following reasons.

*An agreed **Masterplan** showing that the potential conflicts between developing the site for employment uses and the environmental impact of the development needs to be provided by the developer. Only when this is provided, can the EIA Scoping Report October 2024 be considered.*

The First Renewable Developments' 'EIA Scoping Report October 2024' proposes to "*scope out*" of the Environmental Impact Assessment (EIA) the following topics which **should be included**:

- Agricultural Land and Soils
- Ecology
- Flood Risk and Drainage
- Major Accidents and Disasters
- Material Assets
- Waste

Agricultural Land and Soils

- **Loss of existing farmland should be avoided.**
  A detailed assessment of the quality of the agricultural land needs to be included in the EIA. Recognising the importance of protecting **food security** is crucial. Traditional UK farming techniques can be relied upon in the future, whereas advanced agricultural methods envisaged for the site do not have an established long term proven history.
    - The world's food supply chain has been effected by war in the middle east and Ukraine. With tension between various countries continuing, further **disruption** can be anticipated.
    - **Climate change** problems are effecting national and international food production across the world. With scientist and climatologists predicting the effects of global warming to continue until at least the end of this century, disruption to food production will increase.

- World **population growth**, while slowing, is expected to reach 9.7 billion by 2050 and exceed 10 billion by 2080. This will increase demand for food.
- The farmland on the site is regarded as Grade 3 - producing moderate yields of a narrow range of crops (mainly cereals and grass) or lower yields of a wider range of crops. While this may not be premium farmland, it is **established farmland** and does provide a viable source of food production. The produce from this area is currently **used locally** – see the Weetabix advertising campaign promoting the benefits of sourcing wheat within 50 miles of it's plant in Burton Latimer.
- **Advanced agricultural methods** are proposed for the site, which could include hydroponics, glasshouses, polytunnels, and vertical farming. These offer the benefit of growing crops in controlled environments, independent of the weather. These systems require significant amounts of energy to heat, light and ventilate the crops. The **cost of energy** fluctuates due to factors currently beyond the control of the UK. This can make the economic model of these types of modern farming techniques economically unviable. 2023 examples of this are AeroFarms which filed for bankruptcy protection, Agricool went into receivership, and Infarm declared insolvency. The **reliability** of advanced agriculture cannot be depended upon.

Ecology

- At least 10% on-site biodiversity gain is proposed for the development. The site is currently considered to be of limited ecological value due to the intensive arable farming use over much of the area. Given the limited ecological value of the site, the ambition of 10% biodiversity gain could be improved upon. 10% biodiversity gain is the statutory minimum that must be achieved. The Developer's Masterplan Document REVISED DRAFT V1.2 states "*National Legislation requires a minimum Biodiversity Net Gain of 10% and the intention is that this is bettered where possible and efforts are being made to see if a target of 15% can be met.*". The Developer should commit to achieve a minimum **15% biodiversity gain** and demonstrate it through the Government's biodiversity metric calculation tool.
- The **location of land** for the enhancement to support lapwings is now identified in Masterplan Document REVISED DRAFT V1.2. An assessment of the size and location of this pocket of land needs detailed consideration with respect to the behavioural nature of the Lapwings. A suitably experienced and qualified Ecologist should be engaged to consider the proposed buildings, traffic, lighting, noise, etc and the affect they will have on the suitability of this land for lapwings. The Ecologist's report should be included in the EIA.
- Details of **mitigation measures** have not been clearly specified and quantified so should be included in the EIA.

- The EIA needs to demonstrate that the harms to biodiversity are outweighed by the benefits of the scheme, and compliance with Joint Core Strategy **Policy 4** – Biodiversity and Geodiversity. "If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then planning permission should be refused.".

Flood Risk and Drainage

- An assessment of how the treatment and discharge from the site of **sewage and effluent** from the buildings and industries needs to be included in the EIA. While Anglian Water have an obligation to provide mains water and sewerage services to new sites, their infrastructure to treat sewage and effluent is currently inadequate. The effect of this is well reported, numerous times, with pollution events of our rivers and watercourses.
- No details are given on the treatment and discharge from the site of sewage and effluent from the buildings and industries. The EIA should include details of on-site treatment works to be provided or does **Anglian Water infrastructure** have capacity to take the **additional sewage and effluent**? Further information and consultation with Anglian Water should be provided.
- Compliance with Joint Core Strategy **Policy 5** - Water Environment, Resources and Flood Risk Management needs to be demonstrated in the EIA.

Major Accidents and Disasters

- **Hydrogen** infrastructure from 100% renewable energy from B2 Power to Power is suggested. It is understood that this process would use electrolysis to separate hydrogen from water. Further information on the proposal should be provided - how would the hydrogen be stored and what measures would be taken to ensure the safety of this highly flammable element on the site.
- **Battery storage** installation is proposed for the site to store electricity generated from on-site renewable sources. Batteries are suspectable to catching fire and their construction makes it difficult to extinguish. The Fire Service will aim to control such fires to prevent them spreading until the combustion fuel is exhausted. This requires significant amounts of fire suppressant due to the nature and long-time the fires will burn. Details of the fire safety, fire suppression, and measures to containment contaminated extinguishant are not detailed in the Developers documents. Details of the battery installation should be provided to which show that the batteries will be appropriately housed, with adequate fire detection and suppression, with suitable provision to prevent pollution of the surroundings from extinguishant in the event of a fire need to be included in the EIA.

Material Assets

The local area **electrical grid** currently does not have capacity to receive electricity generated from on-site renewables. An EIA should include an assessment of the necessary 132kV electrical grid infrastructure connection and reinforcement required to serve the site and allow the export of spare renewable electricity generated on-site. The provision of any reinforcement work is likely to have an impact on ecology, landscape and views, and the built heritage.

Waste

An assessment of waste generated by commercial, industrial and agricultural activities on the site needs to be assessed and included in the EIA. This is needed to demonstrate that the operation of the development will not give rise to any excessive or hazardous waste streams. Occupier profiles have not been established with proportion of logistic and high technical businesses not determined. The nature of the business and industries is, therefore, unknown and clarification needs to provide certainty that waste will be managed appropriately.

In addition to the above, the following matters need clarification in the EIA:

Climate Change

- **Fossil Fuels** - It is undetermined if fossil (gas, oil) or Biomass (wood) fuels might be used on the site. The use of these fuel types has an impact on climate, through their combustion and transportation, and the environment in the areas that they are sourced, because of habitat destruction and pollution.
- **BREEAM** - The First Renewable Developments consultation documentation proposed Building Research Establishment Environmental Assessment Method (BREEAM) 'Excellent' rating for new buildings is one rating better than the current NNC Joint Core Strategy requirement of 'Very Good', and only one rating below the highest 'Outstanding' rating. However, the EIA Scoping Report October 2024 only states that a BREEAM accredited professional will be appointed for the assessment. BREEAM measures sustainable value in a series of categories, ranging from energy to ecology, as follows:
    - Energy
    - Health and Wellbeing
    - Innovation
    - Land Use
    - Materials
    - Management
    - Pollution
    - Transport
    - Waste
    - Water

The EIA needs confirm the BREEAM rating which will be achieved and which credits will be targeted. This would demonstrate compliance with the Joint Core Strategy **Policy 9** – Sustainable Buildings and the developer's consultation commitments.

We trust you will take these comments into consideration.

For and on behalf of North Northamptonshire Green Party

James Towns

Built Environment Spokesperson

9 November 2024