

Kettering Energy Park (KEP) – Public Consultation

North Northamptonshire Green Party (NNGP) are OPPOSED to this development for the following reasons.

Summary of main reasons:

1. Visual impact on the landscape and view from the listed Round House.
2. Loss of existing productive arable farmland which supplies local cereal producer.
3. The viability of advanced agricultural methods with fluctuating energy prices in the future.
4. The impact of increased traffic from workers and logistics vehicles without any substantial information on improvements to the surrounding road network.
5. Undetermined if fossil (gas, oil) or Biomass (wood) fuels might be used on the site.
6. The Developer has not demonstrated the biodiversity gain that will be achieved using the Government's biodiversity metric calculation tool.
7. No details are given on the treatment and discharge from the site of sewage and effluent from the buildings and industries.
8. Occupier profiles not established with proportion of logistic and high technical businesses not determined.
9. Industry is moving towards automated systems in warehouses and it is not explained how the estimated 4000 jobs across the site will be guaranteed?
10. Evidence to prove the commercial demand for the site is not provided.

These, and other matters, are explored in more detail below.

Vision

Jobs are good but the infrastructure problems and loss of the last walkable, dark sky, accessible area of open land in the Burton area is inconceivable.

Renewable and Low Carbon Energy

- Combined heating power (**CHP**) **fuel source** is not determined. While biomass is apparently excluded, any form of combustion on the site raises concerns about air pollution. The source of the fuel for the CHP may also contribute to carbon dioxide emissions. The nature of the CHP process should be determined to ensure it will not have a detrimental **impact on local air quality** or the principles of low carbon energy for the site.
- 50-100% of operational energy use from renewable sources is anticipated. The development should ensure there is **100% operational energy use** for the site from on-site renewable sources with any excess balance being exported to the grid. The energy produced on the KEP site should cover its energy requirements to support the claim that it is an energy park.

- On-site renewable energy generation from solar PV farms and on building roofs, in addition to current wind turbines, is commendable for offsetting fossil fuel generated electricity. However, such energy can be exported to the grid, as currently envisaged for the permitted solar PV farms on the site. It is not necessary to have buildings on the site to use the renewable energy. As part of building regulations, it is almost certain that the **buildings will have solar PV** installed to meet the Simplified Building Energy Model (SBEM) target. Is it feasible that parking spaces could be covered with solar panels too?
- “Agrivoltaics” – also known as agrisolar or agrophotovoltaics – outlines various ways in which land use can be optimised to address the dual needs of energy and food production. Crops can be planted below and among raised photovoltaic panels with pollinator habitat and native vegetation providing ecosystem services. Livestock can also graze underneath PV panels. Details of how the **PV farms will be integrated with farming methods** on the site should be confirmed to establish to what extent food production can continue to be supported off the land.
- **EPC A** ratings are the best energy performance certificate rating achievable, and will exceed the minimum 2030 proposal of B or better. The current minimum rating is E so an A rating should be commended. Confirmation should be provided that these will be enforced for individual buildings through a **planning condition**.
- **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 used** and how would the **water** for this process would be obtained.
- The burning of fossil fuels is the principal cause of the **global heating** threat the world faces. Confirmation must be provided that the site will **not be supplied** with 1st, 2nd or 3rd family gases, oil or other **fossil fuels** to ensure that KEP does not contribute to further global heating through their combustion for heating or industrial processes.

Environment and Biodiversity

- 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 states “*Secure a minimum biodiversity net gain of 10%, with a target of 15% where possible*”. The Developer should commit to achieve a minimum **15% biodiversity gain** and demonstrate it through the Government’s biodiversity metric calculation tool.

- Sustainable drainage systems are proposed to reduce surface water run-off from the site to the river network. No details are given on the treatment and discharge from the site of sewage and effluent from the buildings and industries. Are 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.
- **Battery storage** installation is proposed for the site to store electricity generated from on-site renewable sources. Batteries are susceptible 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 water due to the long time the fires will burn. Details of the fire safety, fire suppression, and measures to contain 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.
- The masterplan should condition that all occupiers must have robust sustainable travel plans, including proper funding for a site-wide administrator role, to ensure occupiers plans are followed up and enacted. Modal shift away from private vehicles for local commuting should be a priority with several measures in the plan including accessible and safe segregated cycle paths to and from all nearby conurbations that link to the planned Greenway and Kettering LCWIP to ensure a cohesive area wide alternative to driving. Active travel links to Burton Latimer and links towards Hanwood Park on the other side of the A14 are included. Given that the nearest large population centre is to the northeast on the other side of the A14, then active travel infrastructure for cycles, scooters and pedestrians should be provided in accordance with current government guidance, Cycle Infrastructure Design, LTN 1/20. Consideration should be given to a more direct link between Barton Seagrave and Hanwood Park. The **A6 Burton bypass** does not use the full width of the road as a result of traffic safety issues which resulted from a central shared overtaking lane (now painted with diagonal white lines to deter vehicle use) when the road was originally opened. The full width of the road could be used to introduce a segregated **cycle route**.
- **Loss of existing farmland should be avoided.** Recognising the importance of protecting **food security** is crucial. Traditional UK farming techniques can be relied upon in the future, whereas advanced agricultural methods 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 heating 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, Agricoool went into receivership, and Infarm declared insolvency. The **reliability** of advanced agriculture cannot be depended upon. There has also been no indication of the level of light pollution these greenhouses will produce in a dark sky area.

Jobs and Economy

- **Monies for local projects** through a community fund will be set out in a future application detailing any mechanism to achieve this. Further information on the amount of money and areas where it will be allocated should be elaborated upon.
- Occupier profiles not established with proportion of logistic and high technical businesses not determined. This requires establishing so it can be determined if the type of **opportunities to local people** justify the size of the development.
- **Employment use** for the site was not previously identified and infrastructure has not previously been provided when the site was considered for renewable energy generation alone.
- Warehousing is moving towards **automated systems** which could limit the number of jobs being created. How will the estimated 4000 jobs across the site will be created?
- There is a **surplus of industrial development space** in the area awaiting development e.g.

- Symmetry Park off A14 junction 9 where the site has been cleared during the winter 2021/22, has only one building on a single plot, occupying little more than 10% of the site. The land is already destroyed and the developer will be adding the 10% Biodiversity Net Gain.
- Corby, Kettering Road industrial estate, site cleared June 2021 but currently no new units being built on any of the plots.

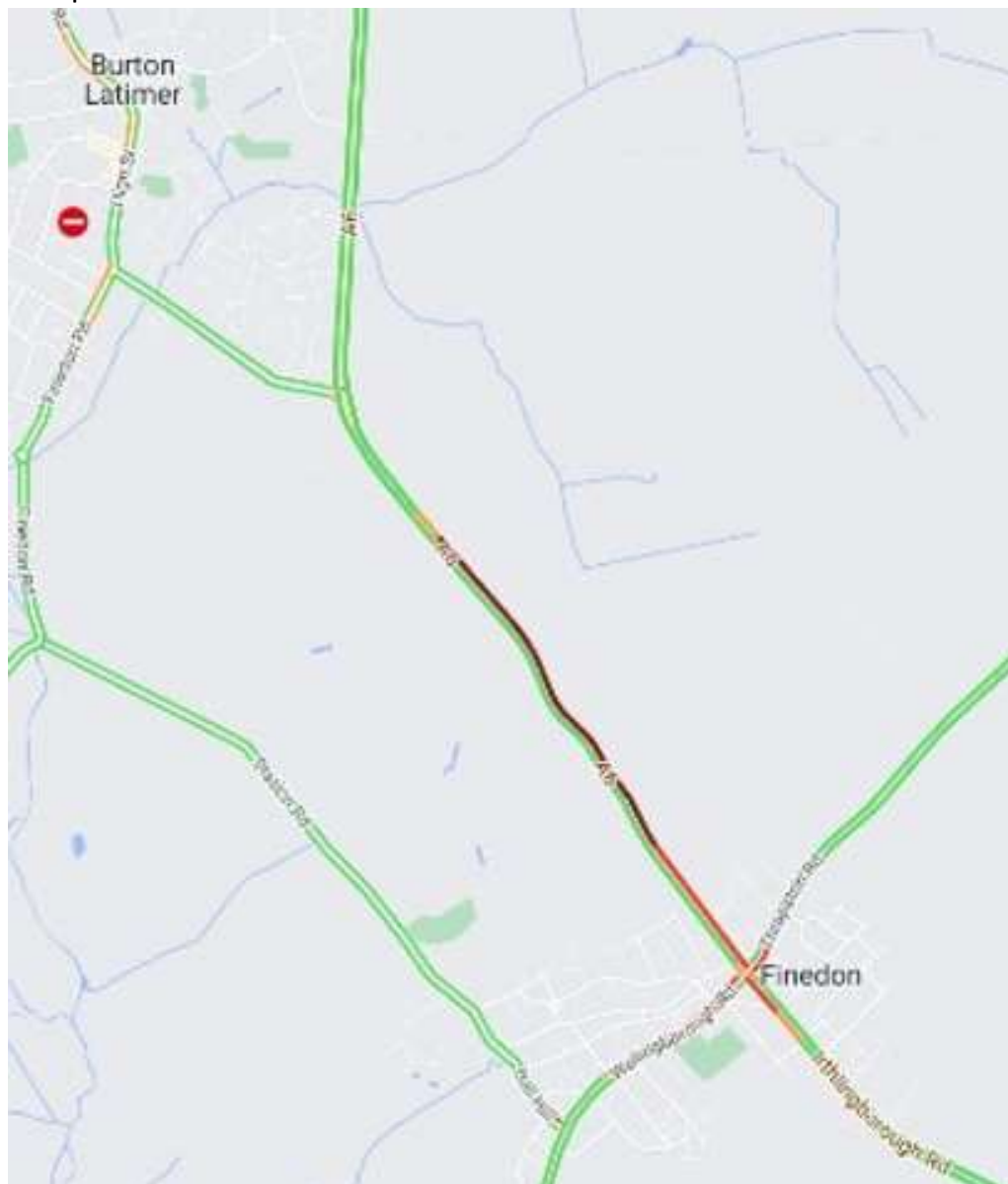
What evidence is available to **prove the commercial demand** for further development of the KEP site given the current availability of land on other nearby sites.

Development and Design Principles

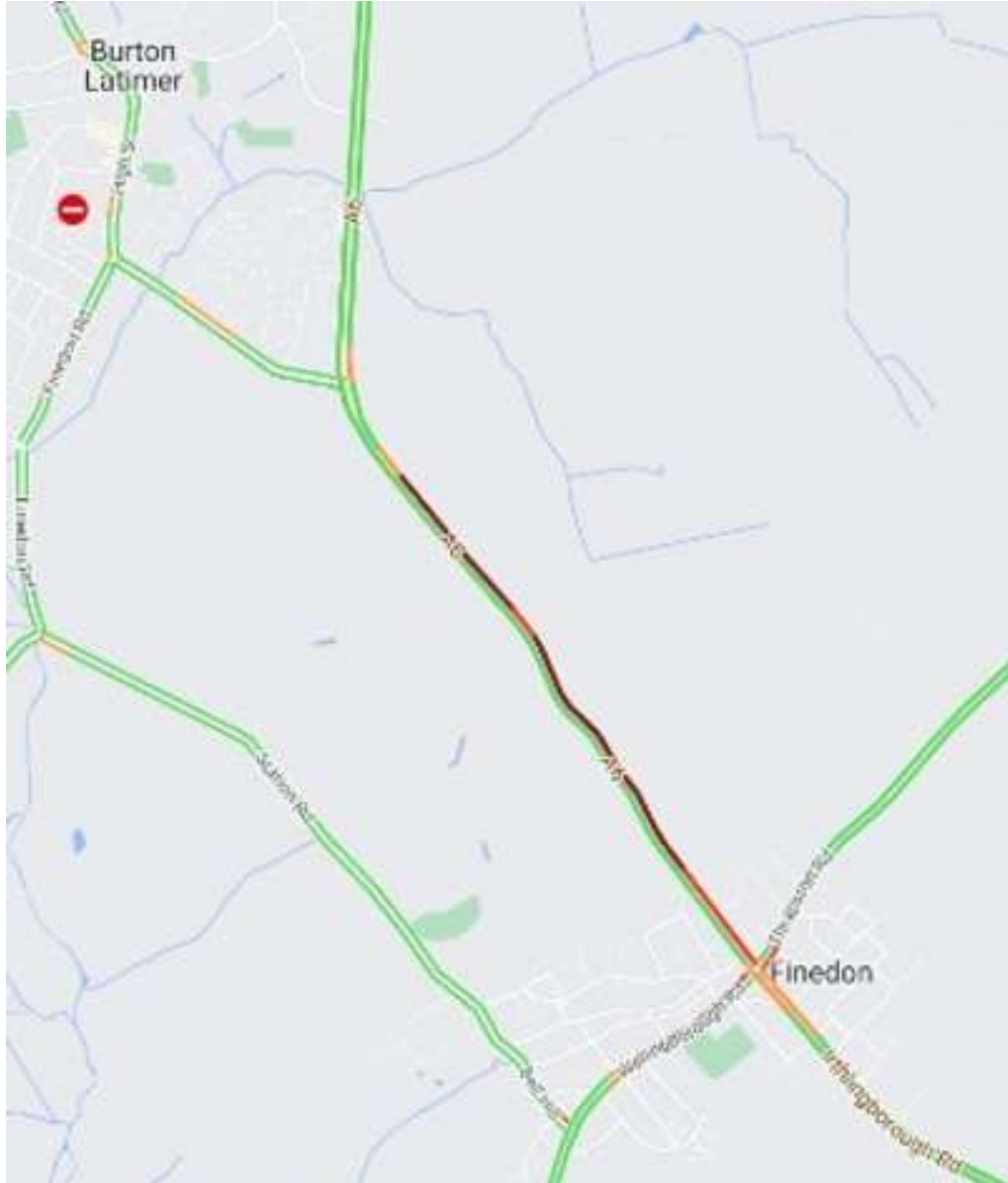
- The proposed Building Research Establishment Environmental Assessment Method (**BREEAM**) '**Excellent**' rating for new buildings is one rating better than the current NNC Joint Core Strategy requirement of 'Very Good', and only one rating below the highest 'Outstanding' rating. This ambition should be welcomed. See Appendix A for description of BREEAM. Is the BREEAM Rating a **target** or a stipulated **planning condition**?
- The size of the buildings and scale of the development will have a detrimental impact on the landscape, destroying views from the listed Round House with buildings up to 25m high. The development zone remains immediately adjacent to the **Round House** on the other side of the A510 road. Tree planting between the Round House and the warehousing is proposed to screen them from view, however, the historic **view will be lost**.
- **Cross sections** through the site should be provided so the buildings scale in the landscape can be assessed from various viewpoints, establishing how sympathetic to the landscape the development will be.
- Outside the site's boundary, other than a new roundabout at the site entrance, there does not appear to be any **improvement to existing road networks** to carry increased traffic that will be associated with KEP businesses and the 5500 jobs created. The updated-Masterplan-Transport-Summary-Report states "Traffic travelling through Finedon will require further appraisal, particularly at the A6/A510 junction, which will need to be tested at a detailed local level. Discussions are ongoing with North Northamptonshire Highways in respect of mitigation at this location to provide a signal scheme to improve capacity".
 - What improvements are planned at the **A510/Woodford Junction**.
 - Are alternative **KEP site access** routes being considered to ease congestion on existing local roads?
 - When will the finalised **transport assessment** be completed for consideration.
 - Does the transport assessment take into account **future** house building and industrial development already granted planning permission.

- A signalling scheme at the A6/A510 junction needs to be supported by an evidential assessment. Currently, traffic jams up for over a mile along the A6 as it travels south in to Finedon during the morning and evening rush.

18 April 7:58am



18 April 5:29pm



- **Public transport** links are only going to be explored. Public transport networks are vital to help limit the number of vehicles using the road network and CO₂ emissions. What provision can be expected from NNC and local providers towards public transport?

We trust you will take these additional comments into consideration.

For and on behalf of North Northamptonshire Green Party

James Towns

Built Environment Spokesperson