A Summary of the Relevant Representation to the Planning Inspectorate from Bishopton Villages Action Group (BVAG) in respect of the Byers Gill Solar Energy DCO application (PINS reference: EN 010139).

Submitted to Examination Authority

for Deadline 1 - 13th August 2024

On behalf of the Bishopton Villages Action Group (BVAG) a registered Interest Party (IP

Reference Number 200048675

Introduction

The Bishopton Villages Action Group (BVAG) submitted a Relevant Representation on 15th May 2024 to the Planning Inspectorate concerning the Byers Gill Solar Energy DCO application. This was around 7,000 words. This summary is in respect of the Examining Authorities request by Deadline 1 (13th August 2024) in the Examination Timetable for a summary of all RRs exceeding 1500 words.

<u>Summary</u>

BVAG has expressed concerns about the proposal's scale, potential harmful consequences, and its impact on local communities. BVAG aims to engage with local authorities to ensure community concerns and local knowledge are fully considered and argues that the proposal does not align with international, national, and local policies regarding planning, renewable energy, and sustainable development goals. BVAG emphasizes the need for further impact assessments, and expresses an objection to the proposal, whilst highlighting inadequacies in the application. The role of the local planning authority and other statutory and non-statutory consultees is important in assisting the community in providing expert independent analysis.

The structure of the Relevant Representation reflected the issues of concern as follows:-

- 1. Introduction to BVAG and approach.
- 2. Summary and Overall Objection.
- 3. Cultural Heritage concerns.
- 4. Ecological, Biodiversity and Nature Conservation concerns.
- 5. Flood Risk, Drainage and Water issues.
- 6. Landscape and Visual Amenity Impacts.
- 7. Noise and Vibration concerns.
- 8. Agriculture and Food Security.
- 9. Employment and Economic Development.
- 10. Transport and Access.
- 11. Air Quality.
- 12. Human and Public Health.
- 13. Glint and Glare.
- 14. Battery Electrical Storage (BESS) and Fire Hazards.
- 15. Government Policy Framework.
- 16. UK Energy Security, and Life Cycle Analysis.

BVAG asserts that the proposal would significantly and adversely affect local residents, heritage and archaeological assets, ecological assets, increase flood risk, landscape character, residential and visual amenity, increase noise and vibration, harm water resources, and impact on biodiversity. BVAG emphasises the insufficient consideration of impacts on flora and fauna, heritage assets, and the landscape's visual aspects. BVAG questions the adequacy of proposed mitigation measures and argues that the proposal does not align with government policies on renewable energy and sustainable development. Additionally, BVAG raises concerns about noise and vibration during construction and the longer term operational impacts on the community and natural environment. BVAG calls for an independent assessment of noise and vibrating impacts, further information on the project's lifespan, and a comprehensive plan to address potential adverse effects associated with the proposed development.

The executive summary emphasises the need for a detailed examination of the decommissioning phase's environmental impact, with a focus on noise, vibration, recycling, habitat protection, and concerns over agricultural land restoration. BVAG raises concerns regarding the impact on loss of productive farmland, employment loss, tourism impacts, inadequate transport infrastructure, air quality risks, effects on human health, and other environmental topics including glint and glare, and battery storage fire safety. The lack of community engagement on air quality and dust emissions, as well as concerns around light pollution and public health effects, are highlighted. Additionally, the summary underscores the importance of adhering to relevant national and local policies, including energy security, sustainable development, and life cycle analysis considerations to assess the proposed project's impact comprehensively.

Moreover, scrutiny is called for on the justification of the proposal within the UK's energy strategy regarding carbon emissions reduction and energy security amid foreign ownership concerns. The executive summary notes the necessity of evaluating life cycle emissions and off-site environmental impacts. Transparency in decision-making, foreign control, and shareholder influence, alongside the absence of comprehensive emissions assessments, are highlighted as critical factors to be addressed.

The document concludes by reiterating the importance of incorporating wider sustainable development goals, aligning with national policy and international obligations, and emphasising the significance of evaluating the proposed project's long-term environmental and sustainability implications for making an informed decision. The applicants present a narrow case based on site specific approach rather than a holistic approach.

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On Behalf of Bishopton Villages Action Group (BVAG).

7th August 2024.