

Planning Ref: LA03/2015/0234/F

To:

Minister of Infrastructure
and
Strategic Planning Department
Causeway Exchange
1 – 7 Bedford Street
Belfast
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Objector's Name and Address:

DFIPlanninggroup@infrastructure-ni.gov.uk

This is a Further Letter of Objection to the proposed Solar Power Station, Kells:

I live at a distance to this application and I note that a revised application has been submitted. Several large scale solar developments have been constructed since I first heard of this proposal and nothing I have seen has convinced me that these solar developments can be hidden in a landscape like the undulating and open Whappstown Road and Speerstown Road area. I understand that the new SPPS has been amended and renewable applications now have to be given an appropriate weighting, rather than a significant one as previously under PPS18. All my objections below should therefore be given a weighting. These are:

1. Loss of Visual Amenity and Change of Rural Character: Policy RE 1 (B) & Policy CTY 14

This application is of such a vast scale and spanning three public roads, if this application is approved it will set a bad precedent for future applications and all of NI's landscape will be at risk of widespread industrialisation: regardless of size, visibility from roads or proximity to residential property.

This application is contrary to the Northern Ireland's Landscape Charter the European Landscape Convention which became legally binding in the UK on 1st March 2007. This Charter ' concerns landscapes that might be considered outstanding as well as everyday or degraded landscapes'. The photo-montages submitted attempt to show no change to the rural character by covering the panels with trees 10-15m high yet only 10% of new trees will be maximum 4.5m high. These are at best misleading. However, they do highlight that this development shouldn't be in this open undulating landscape because it simply can't be hidden. This concern has not been addressed within the revisions to the proposed development..

2. Loss of residential amenity. Breach of Policy RE 1 (A) – Public safety, Human Health or Residential Amenity.

This application still proposes to butt right up to people's homes & gardens and still contains intrusive security cameras along miles of tall perimeter fencing, with no mitigation proposed for the likelihood of images captured from private residential property. This is in breach of Article 8 (Right to respect for private and family life) and First Protocol Article 1 (protection of property)(xi). This concern has not been addressed within the revisions to the proposed development.

Additionally I am concerned about the tangible effect this proposed development has already had on the residents and properties within this area and I draw your attention to a letter on the planning portal from McGuinness Fleck Estate Agents. They state that properties in the area have failed to sell on a number of occasions following agreed offers from keen buyers, as a direct result of this proposal and are concerned that property values are being affected by the proposal or are becoming unsaleable as a result.

3. Loss of habitat and damage to the ecology of the area. Policy RE 1 (C) – Biodiversity, nature conversation or built heritage interests

This Kells Solar site sits close to The Antrim Hills Special Protection Area (SPA) 3.4km. If it is approved, it will set a precedent for any landscape, no matter what protection it has been given before, to be over-ridden by a renewable

installation. The Whappstown Road was named after the curlew and it is the last breeding area for curlew in Northern Ireland. I find it ludicrous that the bird surveyor (whom I understand was employed indirectly by the applicant) could not find any breeding curlews on the 250 acre site, yet when you can walk along the roads in the area and readily hear or even see Curlew, particularly during the spring and summer. This concern has not been addressed within the revisions to the proposed development.

4. Decommissioning. These panels contain hazardous materials and require certified licence holders to remove and dispose of them.. As such, solar panels are likely to be the asbestos of the future, yet PPS18 has no decommissioning bond requirement as exists in other jurisdictions such as Scotland. At Rasharkin, Elgin have passed over the construction and running of the site to another firm with Limited liability status. Therefore the Ltd. solar developer could enter into insolvency without any bond to guarantee that the provisions of the Planning permission can be executed. So will the Department be financially responsible for decommissioning if the solar company fails to pay for decommissioning? Or the Council? Ultimately it is likely to be me as a tax payer picking up the bill in this scenario. This concern has not been addressed within the revisions to the proposed development and must be a material consideration for the Department in determining the outcome of this application.

5. Design: The “Ten Commitments” of the Solar Trade Association, of which Elgin Energy is a member, states that: “land should aim to avoid affecting the visual amenity of landscapes, maintaining their natural beauty and should be predominantly flat, well screened by hedges, tree lines etc., and not unduly impact upon nearby domestic properties or roads”. This application by Elgin Energy Ltd is in breach of all these fundamental aims. If approved, a dangerous precedent is being set by which solar developers are being given the green light to develop wherever they please across Northern Ireland. This concern has not been addressed within the revisions to the proposed development.

6. Cost to the Environment. The claims made by Elgin Energy are unsubstantiated and I believe these to also be exaggerated. The problem with solar renewables is the intermittent supply they provide because the sun doesn't shine all the time, particularly at this latitude and within this climate. Germany has 27% renewables at the moment (we are currently around 20%) and this high percentage of erratic power supply has pushed Germany into increased use of heavy oil and coal power plants, which is why Germany released more carbon dioxide into the atmosphere in 2012 than in 2011. Their policies, hailed as saving the world from climate change have, in fact, increased CO2 emissions by 1.8%. Significant weight should not be given to the wider environmental benefits of this renewable project because it has not been proven that there are these benefits in reducing CO2. To the contrary, verified research and statements by the German Government show that they are pushing CO2 levels up. I believe that the proposed development would be detrimental to the environment far beyond localised environmental damage caused by the industrialisation of 250 acres of countryside, as it would actually serve to increase the CO2 production of the region. This would have national and global consequences. This concern has not been addressed within the revisions to the proposed development.

7. Myth of jobs to the area: I note that the Economic Division have questioned the validity of the figures supplied by Elgin. I share their concern as I am also unconvinced by the job creation claims made by the applicant and I understand that residents living opposite the Rasharkin solar development said that most of the construction workers were from continental Europe- they knew this because they all drove left hand drive vehicles and spoke Portuguese. The Department is required to do due diligence on these claims before giving any weighting to economic benefits. There are no real jobs for Northern Ireland post construction and no economic benefit regionally.

Signature: _____

Date: _____