

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@sillslegal.co.uk>  
**Sent:** 07 May 2021 14:13  
**To:** Little Crow Solar Park  
**Subject:** RE: Little Crow Solar Park - Deadline 1 Submission  
**Attachments:** Little Crow Solar Park - Deadline 1 Submission

**Categories:** [REDACTED]

Dear Sirs

Further to your email of today's date, please find below the submission on behalf of our clients.

Yours faithfully

**Sills & Betteridge LLP**

Dear Sirs

#### **Little Crow Solar Farm**

Further to the Preliminary Meeting and Issue Specific Hearing on 20 April 2021, we confirm that the single point of contact for the Interested Parties Richard Fenwick Johnson, Katie Teresa Holmes, Fennswood Motors Ltd, Mandown Support Ltd and Infocus ID Ltd is [REDACTED] whose email address is [REDACTED]@sillslegal.co.uk.

We further confirm that the Interested Parties wish to be heard at an open floor hearing and that the Interested Parties would like to provide a general tour of the property to the Examining Authority as soon as possible. This would enable the Examiner to see for himself the matters of concern particularly those relating to the roadway.

We now refer to those questions posed to the Interested Parties in the ExQ1:

#### Q.1.1.9

There appears to be much derelict former industrial, storage or port land along the Humber banks which does not appear in NLC's Brownfield Land Register presumably because it is unsuitable for residential development.

There are many wartime and post war airfields in Lincolnshire, where there is minimal or no use of runway, taxiway or apron areas.

The former British Sugar factory site at Brigg is currently in the market extending to in excess of 42 hectares with less than 16 ha zoned for employment use

#### Q.1.3.1

We consider the extent of the Order Limits assessed in the Air Quality and Carbon Assessment (APP-081) to be erroneous as although the plan at page 2 is correct, the narrative references in APP-081 are incorrect. At Page 7 it is stated that "There are no notable ecological receptors within a 200m vicinity of the development. There are, however, two residential properties less than 350m from the Order Limits." This is incorrect in that the Interested Parties' property is far closer than 350m from the Order Limits. They are in fact, under 50m from the Order Limits.

This has a significant impact on the assessment of the trackout on page 9, which is deemed to have a large potential effect but is not likely to be taken to be a concern as the description of the Order Limits indicates that the nearest residential property is 350m away.

Moreover, page 10 states that “the closest properties to the proposed site consists of two farm structures with at least one structure being used as a residential dwelling and are located east of the proposed site and North of Broughton at distances of 280m and 415m from the Order Limits.” This has similarly been drafted on the basis of Order Limits that do not match those on the plan at page 2.

We have not verified the information within the Air Quality and Carbon Assessment; we have merely highlighted points where it appears that the report has been written in relation to erroneous Order Limits.

If there are any further mistakes in relation to the Order Limits, we have not necessarily picked them up.

Q.1.9.1

We consider the extent of the Order Limits referred to in the Noise Impact Assessment (APP-085) are erroneous. That feeds through into the narrative of the Noise Impact Assessment. The roadway and a section of land above the roadway (immediately south of Plot Wood) are included within the Order Limits as can be seen from the site plan in APP-006. However, these areas are not included in Figure 14027-SP1 purportedly describing the Order Limits for the purposes of the Noise Impact Assessment.

The effect of this is that Heron Lodge is described as north-east of the source of noise (Para 2.0 Noise Impact Assessment). Clearly Heron Lodge is north-east of the Solar Farm, but it is not north-east of the nearest source of noise, which is the roadway. Heron Lodge is due south of the nearest source of noise (the roadway) and potentially is also closer to the land above the roadway omitted from Figure 14027-SP1, than it is to where the main body of the Solar Farm is to be located. It is not clear what noise will be generated in this area to the north of the roadway.

Yours faithfully

Sills & Betteridge LLP

**Sills & Betteridge**

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May we take this opportunity to once more thank you for your patience and understanding.



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