Submission ID: 12599

Please consider all these points and issues that have arisen from the publication of the developers' documents and also being one of the receptors of the impacts this project will have: Consultation and the Developer:

• Inadequacy of consultation – documents were not at libraries as stated and the local ward councillor confirmed no documents were at listed sites. I have written evidence of this. Within the 3km consultation zone, some homes in that zone did not receive any material.

• Solar 21 have failed to keep the website up to date – only updated Nov 2022 and prior to this the last update was Sept 2021. They have failed to keep consultees informed at each stage of the application/process.

Please see the following in response to the developer's application and documents:

• The EIS and PIER response (table 3.1.1.3) states that if RMS Flixborough is taken under a compulsory acquisition order then all the jobs will be transferred to RMS Gunness and Althorpe but now this is impossible as RMS has sold both sites. This is clearly going to create numerous job losses above what Solar 21 have initially predicted.

• Scoping Report was very out of date as it was published on 30th Oct 2020 but information in this was initially recorded in 2019.

• Overcapacity RR – Enfinium, who run Ferrybridge 1 and 2, state that they need the feedstock to meet capacity in the area. Feedstock will not be coming from local area therefore it could be sent to incinerators that are already built closer by.

• The Humber Low Carbon Pipeline has now chosen it preferred route corridor, and the corridor which would have been beneficial to the project, has been rejected. SSE have Keadby 3 approved, and 4 in the pipeline which can utilise this pipeline more effectively due to one of the AGIs being located close by. One AGI for the project will also be located at British Steel, which was considered as an alternative site for the North Lincolnshire Green Energy Park, but was rejected by the developer with no clear reason. This is a clear spur the developer could utilise. What were the reasons for rejection?

• Application for the project, and the infrastructure required in the surrounding area, is not in the North Lincolnshire Core Strategy. North Lincolnshire recycling rates in 2021 were 54.2% against a national average of 43% demonstrating North Lincolnshire is committed to Reduce, Reuse, Recycle. The 2035 target of a 65% recycling rate could be impacted if this project was allowed to go ahead.

• The North Lincolnshire Local Plan, which has been submitted to the Planning Inspectorate for examination in Q4 2022, is not supportive of the loss of an †operational port facility' as this is significant locally.

Scoping Report/EIS Comments and Considerations:

• Brexit and the war in the Ukraine makes us more reliant on resources from home. Acres of greenfield and arable land would have to be taken away to accommodate the energy park according to the Scoping Report part 3.2.5.6. Some of this land will not be able to reinstated due to it being â€~inaccessible, severed and unviable' in the EIS part 8.2.5.3.

• The Scoping Report alludes to in part 5.3.1.5 the impacts of the project from start to decommissioning will have a 25- 40 year life span. NLC are wanting the Ilse of Axholme to be recognised as an ANOB and this could impact this submission.

• Scoping report lists dust, waste gasses, odour and increased activity as â€ĩlikely significant effects' of the project. How will these impacts be mitigated?

• Numerous statutory designated sites are with 15km of the project. Visual impacts on the area will affected the surrounding area by at least 7.5km. Should this be the case when we have numerous SSSIs, SACs, SPAs and LNRs?

• Part 12.7.1.4 says there will be impacts on nearby areas due to the lighting that is required for the project and will †alter sense of place'.

• 13. 1 â€" Heritage â€" Amcott's Ferry located next to the proposed site and could be

disturbed due to works. Also, many heritage assets which have not been fully explored.

• Scoping Report, part 11.3 identifies protected species, some of which are â€red', in May 2019 and Sept 2020 and potential for bat roost. Zone A was surveyed in 2018 which is a vast time lapse between the survey and publication. Part 3.6 of the Bowland Habitat Survey appendix noted 50 lapwings, which are â€red' listed, were seen in arable fields north of Amcotts during when the surveys were completed by Bowland Habitat Surveying. Bats, red listed species and wintering birds were recognised in Chapter 10 â€" Ecology and Nature Conservation. These habitats have probably thrived since the March 2020 lockdown. Have further surveys been done that were alluded to in figure 11.7.1.11 of the Scoping report? Chapter 10 alludes to habitat loss being long term and significant and adverse effects will be notable in places such as Risby Warren SSSI.

• Volume 6 of the ES states increased noise levels will impact properties in Amcotts during construction and decommissioning. A noise complaint is ongoing with NLC regarding noise from RMS Flixborough.

• Chapter 11 Landscape and visual impact states the project will have a â€~large' effect on the area and its duration and reversibility impact will be â€~large'. Table 19 indicates this impact will not be low until 15 years after the start of the project. The impacts of the project, as a whole, are irreversible.

• ES lighting strategy needs clarity as sensitive environmental receptors nearby, including potential badger sets and Amcotts could be affected if no clear strategy is in place. Amcotts has had issues from lighting from Flixborough Wharf recently, raised by one of the parish councillors.

• ES – Noise – this has been highlighted to be above the criterion of 75db during the day in the construction phase and will exceed this by 4-8db. Some properties on Trentside, Amcotts have been identified as being receptors of up to 7db above the criterion at night-time. Is this acceptable considering receptors of this noise live under 200 meters from the site? The ES project design does not highlight if the applicant will commit to any quite time as they suggest the plant will run 24 hours. Could there not be a †quiet time commitment after 11pm? Is this likely to now last for up to 7 years as alluded to at the preliminary meeting and ISH1 and ISH2? The ES says this impact would only affect receptors for 3 years.

• ES – Health – What will be the true impact on health when 585 to 800 vehicles move on and off the site in Year 4? How can local infrastructure support this number of extra vehicles daily? Those with long term respiratory illness, some of which due to Covid, could be exacerbated in the nearby area.

I have concerns about pressure on already stretched health services in the area due to accidents, potentially serious, on site.

What programme are they going to put in place to help with anxieties over Flixborough, Nypro? They don't specify how they are going to †acknowledge and actively manage' these. Also RDF is not a †stable material' as we know all too well from the waste fires during summer 2022 in Scunthorpe. Two recycling plants (Northern Watse and Ellgia) had more than one waste fire which proved difficult to get under control on more than one occasion. The village of Amcotts was plagued by the smoke and pollutants that this created.

Can the developer clarify the impacts on health due to the effects on air quality as they state: â€methods that allow quantification of cases' are not in place to fully assess the impact on health.

Part 6.2.8.5 clearly states that morality being premature is directly impacted by PM2.5 and NO2. 29,000 premature deaths occur at a typical age per year. These are only some of the toxins that are produced from incineration. How can this be mitigated?

Other notable points:

• RDF creates unpleasant odours and attracts flies. The village of Amcotts has been blighted by flies previously from ships on Flixborough Wharf, so much so, they often had to be decontaminated with smoke bombs.

• Amcotts is an award-winning village for it environmental and community projects. It has received numerous awards from the RHS, most notably being a national finalist this year. It also

has been awarded numerous accolades from CPRE. Nature seems to really be at one in the village, the owl boxes installed this year already have owls which have settled in them; herons are regular visitors; buzzards, sparrow hawks, and even little egrets. I fear that this abundance of wildlife would be scared away with such a large development across the river and the amount of disruption it would cause during construction, operation and decommissioning.

To conclude, I chose to live in this village due to it agricultural heritage and the opportunity to immerse myself in the wildlife that frequents the area daily. I feel it would be injurious to allow anything to take these well-established assets away.