

STURTON BY STOW PARISH COUNCIL – WEST BURTON – additional submission open floor hearing 8th November 2023

Sturton by Stow parish council has the following additional points to raise.

1. Since there are no definitive plans submitted, but supposed and assumed positions; should this application be classified as an 'outline' planning application?
2. The applicant is a developer and due to the non-specific nature of the documentation and plans submitted does this make the inference that the developer will actually sell on the development proposal if consent is gained?
3. There are references that landowners have alternative land available for agricultural uses. Is any of this land also earmarked for use within other solar projects? This could have implications under cumulative impacts.
4. Why is this application being routed to West Burton. Many documents state that the cable routing is down to grid connection preference by the undertaker. Did the undertaker specify West Burton instead of Cottam or did the applicant request West Burton? This particular application area is actually closer to Cottam grid connection (closer than Island Green Power Cottam application). The applicant is being disingenuous by insisting on unnecessary cable corridor works as well as excessive destruction of flora and fauna.
5. How many license holders are currently expected to use the connection capacity at Cottam? What grid capacity is not allocated by license for Cottam?
6. How many panels are forecast to be installed? What is the rate of failure of the panels? What rate of replacement can be expected?
7. The sites will not be completely secure during construction. They may be subject to targeted theft and damage. Will the potential for theft and damage mean different security fencing will need to be installed? Has the applicant allowed for this scenario? What are the alternate options and what will be the expected impact on wildlife if more secure fencing has to be installed? For example, a hare could find its way through deer fencing, but it would not if security style fencing were to be used.
8. The applicant expects and has forecast that there will be sufficient land-fill capacity to deal with the expected number of solar panels to be disposed of. Does the forecast capacity also include the additional disposal required for each of the schemes undergoing inspection and other proposals not currently part of the NSIP process?
9. Where will the panels be manufactured? This does have significant impact on the development. What labour force will be used? Can the applicant, and Secretary of State **absolutely and categorically** guarantee that no forced labour will be used to produce any part of the solar pv site? Since the plans are illustrative only, any reference to a specific manufacturer cannot be taken as confirmation they will be the ultimate supplier.

10. How has the carbon produced by mining of bare earth minerals, manufacture and transport been accounted for?
11. There are no other projects of this combined scale located close to residential properties anywhere else in the world. What will the effects be on humans as well as animal species living in close proximity to the potential millions of panels. There have not been any studies which can project any harms, because the scale of the combined projects simply does not exist.
12. There is no upper limit to the dDCO for generation capacity – Why? This will leave the site open to being used for additional generation. Using the excuse that the grid connection licence will limit the capacity is not acceptable. This site could be used for additional forms of generation, unless explicitly excluded from the dDCO. The applicant argues that their certified documents will preclude additional generation, but an application which has ‘in perpetuity’ on the granting can be easily overturned for a subsequent application.
13. How will the dDCO return land no longer needed for generation purposes to the land owners?
14. Will the dDCO contain measures which will release land as more efficient pv panels become available and therefore less panels are needed to produce the same amount of electricity?
15. What will the gross capacity have to be in order to generate the expected 480MW of power?
16. The health impact to residents is not being taken seriously and appears to be systematically marginalised. This should not be allowed to happen. Residents are going to have to live with the ‘temporary’ nature of this development for the entirety of their lives and generations beyond.
17. Please discount sheep and grazing as a method for grass management strategy. Clearly this cannot be a serious option since there are not enough sheep, shepherds, transport, infrastructure or abattoirs. 000132. **WB6.3.19.2 Outline soils and agriculture) APFP Regulation 5(2)(a) - see ref: 19.3.3 & 19.3.4 and Table 19.2 - 8.6 Operation – 8.6.2 – 8.6.4 and 8.7 Decommissioning - 8.7.3** The references to using sheep for grazing – again these references are littered throughout the many documents the applicant has submitted (too many references to note)! How many sheep does the applicant think reside in Lincolnshire (or the whole of the UK for that matter), since most solar pv site applications seem to rely on sheep as a grass management strategy and symbiotic agricultural use?
18. **APP WB 6.2.19 (soils and agriculture) APFP Regulation 5(2)(a) 19.8.2** states that ploughing is used every cycle of planting. This statement is untrue.
19. **APP WB 6.2.19 – 19.9.12** states there will be no loss of agricultural land – clearly you cannot farm arable underneath solar PV panels – therefore this statement is misleading.

20. Storage of top soil: several parts of the three Soils and Agriculture documents (*why is this not one document?*) state, in various guises that stored top soil will be used to restore agricultural land. Clearly this will not ultimately be 'top soil' since the internal soil of any stockpile will be subject to degradation due to lack of sunlight and organic matter over a significant period of time. The applicant needs to address this issue. Top soil is a valuable and irreplaceable asset.
21. Waste: **WB 6.2.20 Environmental Statement Chapter 20: Table 20.5 Waste arising from construction:** The soil density calculation may not be appropriate for this particular area; estimated soil density of 1,250kg/m³ would be an underestimation; a figure of 1,800kg/m³ would be a more accurate representation for this particular region.
22. There is a fast-paced growing demand for year-round production of food. The Agri-tech to do this is rapidly evolving; if the land is industrialised this will not only put Lincolnshire and specifically West Lindsey at risk, but greatly impact UK food production. It will stifle scientific research and future food production applications.
23. There are references that the landowners whom are willing to lease their land also have additional land available to farm. **EN010132-000432-WB6.3.19.1 Environmental Statement Appendix 19.1(7.1.1)** How much of their additional land is also subject to leasing to other solar pv sites? How much of their additional land will actually be subject to agricultural activities?
24. Department for Energy, Security & Net Zero has recently (2023) published a report which states;
"Biomass is already a key component of our energy supply, with bioenergy generating 11% of total electricity supply in 2022." The land earmarked for solar is already producing quite literal renewable energy. What impact will the reduction of product for biomass have on this industry and this strategy?
25. **Lighting** – in this rural area there is no background lighting pollution to make the use of 'white' light appropriate. The use of infrared lighting is muted in the assessments and this should be the primary option of lighting. Ideally, no lighting or the use of 'dark skies' lighting would be the preferred option if white light is to be used.
26. There is no time limit specified in the dDCO for the use of the land for the project. Is this an oversight or an underhand way to extend the project beyond the 40-year limit which is alluded to in the ecological assessments? There is doubt this will ultimately be a 40-year project since the ISH on November 9. All documentation refers to 40 years not 60 years usage. When will the updated assessment documentation to account for an additional 20-year usage (along with replacement, disposal and construction) be available?
27. The draft dDCO – page 69 and 70 Schedule 10, Article 22 refers to 'blasting and piling' why is blasting within the document? This would give the impression that rock will need to be removed; This has not been demonstrated as necessary.

28. Traffic is a major consideration. The A1500 is a major component of the routing for construction traffic along with B1241.
29. B1241 is being used primarily for the access to 3, 4 and 5 and 116. The road is not wide and is subject to many bends.
30. We specifically ask for B1241 to be looked at during the unaccompanied site visit. In Particular the junction with A1500 and B1241 – Tillbridge Road/Saxilby Road, Sturton by Stow.
31. The route specified in **Figure 5.1 of App 14.2** for West Burton 1 shows the use of A15, A1500 and B1241. Please make particular note that the junction of A1500 and B1241 (Saxilby Road) is narrow. The New Plough Public House has been struck many times by vehicles turning into Saxilby Road from A1500 (Eastern) Tillbridge Road. Particular care must be taken at this location. The footpath is extremely narrow and is used by pedestrians. Perhaps a different routing could be sought? Please note that A1500 at Tillbridge bridge was subject to major flooding in October 2023. In November 2019 the road was closed due to flooding for several days.
32. **App 14.2** Traffic Management – Figure 5.3 Construction Route 3. Grid connections 114 & 115 to Cowdale Lane. The same comment as note immediately above applies to this routing. In addition, the crossroads with Bransby (junction of B1241 and Cowdale Lane) This has had significant accidents in the past, some of which will fall outside of your 5-year review data. This crossroads is on a 60mph road and visibility is poor. Traffic management will be needed at this point. The crossroads was recently (Oct 2023) impassable due to floodwater.
33. Please note that the village of Sturton by Stow is bisected by this major road (A1500). The village is subject to 30mph. The centre is dominated by a staggered junction with B1241. Particular care must be taken when travelling through.
34. In the traffic document; **Chapter 14, Appendix 14.2** in respect of B1241 there are serious omissions. Abnormal routing for WB3 states A1500 → B1241. See comments above regarding this junction. There will be no option to widen any part of this junction. It is subject to buildings which obviously cannot be moved.
35. **Flooding**; There is scant regard for the issue of surface water flooding and what there is, is dismissive. October 2023 saw storm Babet wreak havoc. Sturton by Stow parish saw significant and destructive flooding not only of land but included dwellings; This was worse in many respects than the flooding experienced in November 2019.

The following roads (Sturton by Stow Parish) were at several points impassable;
 B1241 junction of High Street and Fleets Road
 B1241 Saxilby Road and Cowdale Lane (Bransby crossroads)
 Fleets Lane.
 Thorpe Lane

Land;

Till washlands along River Till
Fields adjacent to River Till – extensive flooding noted
Fields adjacent Saxilby Road/Cowdale Lane

These locations are within or adjacent to Sturton by Stow. Significant flooding was observed along the entire length of River Till as well as field surface water flooding in the wider area.

36. Use of the 'Rochdale Envelope' principal is significant in the illustrative application measures and plans, but does not address surface water flooding adequately or appropriately.
37. The principal of the Rochdale Envelope can be used to formulate a decommissioning strategy using this 'worst case' scenario? The current way of disposing of PV panels must be the baseline and is a known concept. There must be some form of decommissioning strategy embedded in order to facilitate the ongoing replacement of PV panels as they fail or reach the expected replacement point midway through the project and the ultimate total decommissioning of the site.
38. We would wish to see a significant investment prior to and during the construction phase as well as ongoing contributions during the lifetime of the project. We would expect no less than £8,000,000 (£8 million) as an initial funding donation and then regular significant payments annually. This figure is based on the amount of energy likely to be produced by West Burton solar and to be *used for community benefit for those communities impacted by the West Burton solar project*. IGP have compared their energy production to the now defunct West Burton power station in their leaflets. **We have extrapolated the known production of Triton Knoll and their funding structure.** There is precedence for community compensation set by other solar projects and windfarms such as Triton Knoll. We expect community restitution and compensation. Our residents will be subject to disruption during the construction phases as well as the ongoing maintenance visits and visual impacts for at least 40 years (or will this be 60 years?)
39. Decommissioning is expected after a 40 (60?) year period; There is precedence for an ability to trigger decommissioning in **Burbo Bank Offshore Wind Farm granted 9th July 2003 "Abatement of works abandoned or decayed 8.-(1) Where Work XX or any part of them are abandoned or allowed to fall into decay, the Secretary of State may, following consultation with the undertaker, issue a written notice requiring the undertaker at its own expense to repair and restore or remove Work XX or any relevant part of them,..."** There are further parts to this particular statement. There should be a mechanism whereby decommissioning can be enforced due to operational unforeseen circumstances. The prospect of 40 (60?) years operation should be able to be reduced or enforced