

Stow Parish Council submission concerning the application by Cottam Solar Project Ltd for a Development Consent Order

Introduction

This submission provides the views of Stow Parish Council (SPC hereafter) on the application by Cottam Solar Project Ltd for a Development Consent Order for the Cottam Solar Panel farm.

Recently there has been a spate of applications for development of solar farms in our area, namely: Cottam 1, 2 and 3; West Burton 1, 2 and 3; Gate Burton; Tillbridge Solar and Stow Park. Stow Parish is specifically affected by Cottam 1, but also West Burton 3 and Stow Park (Luminous).

SPC has seen and supports the document sent to The Planning Inspectorate for England (PINS) by the Sturton by Stow and Stow Parishes' Neighbourhood Planning Group submitted on 19/7/23. This document bears similarities, but we have made additions and alterations in this submission to incorporate aspects specific to our Parish.

The Government's drive for a zero-carbon economy by 2050 is supported by SPC, but the right balance needs to be achieved between the scale and location for renewable energy infrastructure and loss of our valued heritage, agricultural land for food, landscapes, biodiversity and public amenity such as walking, horse-riding and cycling routes, and access to the countryside for health and wellbeing. We comment further on these aspects in this submission about the proposed Cottam development, but they are magnified by the many other solar farms proposed nearby. This impacts on the local area not just due to the 4-5 years of construction traffic, noise and pollution, but also the sheer scale of all solar farms that the area will be subjected to.

The Central Lincolnshire Local Plan 2022 does not provide a framework for guiding large-scale solar farm development proposals. Our Neighbourhood Plan did not anticipate, and was not written, to address concurrent large-scale applications for commercial solar PV farms. However, the aspirations of the electorate e.g., regarding conservation of heritage assets, enhancement of biodiversity, access to the countryside are very clear in our Neighbourhood Plan, which was adopted in July 2022. For this reason, we allude to it in the following text.

The note in the developer's application, which seems to confer a positive stance to large commercial solar farm developments in our Neighbourhood Plan, is incorrect and should be dismissed.

The area

Stow is in the district of West Lindsey. Stow Parish is in the Till Vale and is overwhelmingly agricultural with wide, open vistas, for example, across the fields to Lincoln Cathedral on the limestone ridge.

Within our parish, in the area covered by the Cottam proposals for solar panels, there are three Scheduled Monuments. These are covered in Policy 6 of our Neighbourhood Plan.

- Site of a college and Benedictine abbey, St Mary's Church in Stow (1012976) [Historic England listing]
- Coates medieval settlement and moated site (1016979).
- Medieval Bishop's Palace and Deer Park (1019229).

In paragraph 13.5.1 of the Environmental Statement: Chapter 13 Cultural Heritage it states: 'none of the scheduled monuments are located within any of the sites.' However, there are proposals for panels near to the sites at Coates and Stow Park. There are several Grade 1 and 2 listed buildings, on the construction routes:

- St Mary's Church (1146624)
- St Edith's Church (1146742)
- Stables and Pigeon Cote (1146735) and Threshing Barn (1064063), Church End Farm.
- Manor Farm (1359486).

And buildings that are not listed, but are considered as historically significant locally, for example:

- West Farm, Normanby
- 2, Stow Park Road, Stow.
- 3, Normanby Road, Stow.

Although there may be no direct visual impact of the final solar farms to these buildings, the long-term potential structural damage to these, plus many other historic dwellings, caused by the construction process has not been addressed in any of the proposals.

Island Green Power's consultations on behalf of Cottam Solar Project Ltd

Island Green Power, and their consultants, who include Lizlake and Lanpro, have consulted with the residents of Stow Parish and with SPC during the Phase 1 and Phase 2 consultations conducted prior to Cottam Solar Project's submission to the Planning Inspectorate. We are pleased to see that some amendments to the plans have been made based on these consultations.

The documentation submitted to PINS is, inevitably, very thorough, very detailed and of a technical nature that severely challenges a layperson. It is not easy to find one's way through the documentation and requires a great deal of time and energy on the part of local residents.

Given the potential dramatic impact of the proposals on local people they want to understand the impact upon themselves individually and on their community. The volume and complexity of, and lack of a layperson's perspective in, the documentation has rendered the submission impenetrable to many people. In this respect, we consider the overall consultation to be inadequate and prejudicial to residents' interests. Furthermore, these documents contain information which was not included

even at a summary level in the pre-application consultations, but which is of great importance to residents.

We are pleased to note from the EIS Chapter 14 page 12 that Green Lane, which is a popular public right of way, is no longer proposed as a construction route, and less panels are now proposed alongside it. However, the developers have proposed that Green Lane is retained as an access route for the operational phase of the project. We are strongly opposed to its use in this way, for the same reasons of unsuitability and negative environmental impact, given in opposing its use during the construction phase.

The intended use of some fields, such as sites with archaeological remains e.g., those at East Farm, has been changed from solar panels to wildlife habitat. A new permissive walking route is proposed which is welcome, but not at the expense of other routes such as Green Lane as mentioned above.

It would also appear that our concerns have been heard in relation to some of the fields surrounding the houses adjacent to Ingham Road and Green Lane, which are no longer included. This is a considerable relief to the residents, and we are appreciative of this amendment to the plans.

Other aspects of the consultation feedback have not been incorporated. These, and additional information made available since the consultations, form the basis for the points raised in this submission.

Overall Carbon Footprint of the proposed Cottam scheme

We note that several respondents to the Consultations have raised questions concerning the life-cycle carbon benefits of the Cottam Solar Project. A proper assessment of this would include the carbon footprints of the material sourcing, equipment manufacture, construction, operation, eventual removal and recycling of the panels and other equipment, and the reinstatement of the countryside. We are not aware that such an assessment has been created or provided and feel strongly that the project should only be allowed to proceed when it has been proven to provide a significant and clearly quantified benefit. A “hoped-for benefit” or a reliance on “future technology yet to be invented” is not an adequate response.

Societal impact

We are concerned to note that questions concerning the effects of the project on food production and employment opportunity in the agricultural sector, and on industries such as tourism, have not been replied to, nor have we found an assessment of these issues in the documentation. The combined effect on the local supply of housing and accommodation that the developer states is needed during the construction phase, outstrips the current availability within a 30 min and 60 min transport time. This is another negative impact on the local community, adding to the carbon footprint impact and traffic congestion that has not been adequately addressed within the consultation documents.

Construction traffic

We have major concerns about the impact of traffic for the construction phase. The timeframe of which for all of the projects will total nearly 5 years for local residents.

The proposed route for 20% of the Heavy Goods Vehicles for the Cottam 1 West solar fields is northwards from the A1500 in Sturton by Stow along the B1241 through the centre of Stow to access point 13 at the end of Cotgarth Lane/Stone Lane in Willingham. In addition, the Cottam Battery Storage unit requires 3000 HGV deliveries. These may follow the same route, depending on the battery storage solution adopted. There are also five very long, heavy and voluminous Abnormal Loads carrying transformers to the substation at the end of Cotgarth Lane, and 75 or more trips carrying 30 tonne cable drums.

The five transformers would each weigh 157 tonnes, and with their transporter would have a combined weight of 249 tonnes.

The HGVs and Abnormal Loads going to the cable route access points 114, 115 and 119, and possibly to cable access 116, 117 and 118, are also planned to travel along this route. The Abnormal Loads for the cable route carry 30 Tonne cable drums and are 26m long.

All the vehicles mentioned above, travelling to the Substation, the Cottam 1 West solar fields, and the three cable route accesses, are routed through the centre of Stow village, and in doing so pass immediately adjacent to private houses and to the Scheduled Monument of St Mary's Church. We have not found any assessment of the effects of the proposed repeated passings of very heavy vehicles on the foundations of the Scheduled Monument, and on the private houses bordering the route. There have been no structural assessments or recognition by the developers that the proposed routes in this area are wholly inappropriate for this size and volume of traffic. In regard to the very real possibility of structural damage to the neighbouring properties including listed buildings, the Applicant's proposals are silent on who will own and maintain the liability for this over the duration of the project's entire lifespan (including decommissioning).

The Access and the Transport Management Plans are all dated January 2023, and as such were not available for residents to comment on in the Phase 1 and 2 consultations.

We are concerned in general about the Transport Management reports. These are Chapter 14 "Transport and Access" of the Environmental Statement, Appendix 14.1 "Transport Assessment", and Appendix 14.2 "Construction Traffic Management Plan".

The summary report in Chapter 14 includes the "Study Area" for the routings of construction traffic to the solar fields and uses these routes for the Safety and the Delay assessments, but the routes for access to Cottam 1 West do not include the B1241. At 14.7.22 the rationale given for this is that as it is calculated that there will be an average of only 1 HGV a day using that route it is scoped out of the assessment. SPC finds this approach unacceptable, as the B1241 passes through the centre of Stow, the village where most of the residents of our Parish live, and past the Sturton by Stow Primary School, which many of the children in our parish attend. The B1241 is included in the construction routes referred to in Appendix 14.1 – it is included on the map at Fig 6.3 and paras 6.23 and 6.24 acknowledge that there will be a

requirement for some HGVs to use that route to Access points 10, 11 and 13. Para 14.7.60 acknowledges that the B1241 through Stow village will form part of the cable corridor construction route to accesses 114 and 115 possibly 119 (confusingly referred to in 14.7.65 as 14, 15 and 19) Again SPC finds it unacceptable that consideration of that part of the route is scoped out of table 14.24 showing effects during construction.

In chapter 14, the traffic associated with the construction of the solar fields is assessed and compared with base loadings on the roads now and predicted loadings in the future. Assessments include those of Accidents and Safety, Driver Delay and Pedestrian and Cyclist Amenity and Delay. However, the traffic associated with the cable route is excluded from this comparison, as it is predicted to last for “only” 90 working days per access. 90 working days **per access** is over **four months**, but this is deemed acceptable (by people who don't live here!). We understand that ‘Temporary’ means that the work lasts for less than 6 months, but cable accesses are proposed at separations of 1km along the whole route, so for local residents the cumulative effect will last far longer.

The B1241 is of particular concern in this respect, as it passes through the villages of Stow and Normanby en route to cable accesses 114 and 115 just north of Stow, to access 119 in Kexby, and possibly to access 116, 117 and 118 in Willingham as well (the map in Figure 5.7 of the CTMP in Appendix 14.2 (APP/C6.3.14.2) shows B1241 as the route, though this is inconsistent with the description of the routes at 5.16 where it states they will be accessed by internal routes. This anomaly needs to be clarified).

The combination of cable route traffic to these accesses will last for much longer than 90 working days – a year or more is more likely from the information supplied in the developers own proposals, therefore it is not acceptable to label the cable route work as “Temporary” and use that designation to exclude the cable route traffic from the Safety and Delay assessments.

The Safety and Driver/Pedestrian/Cyclist Amenity and Delay assessments in the Transport and Access report are also deficient because they ignore the traffic on the B1241 passing the local Primary School (which is a high sensitivity receptor). We find this a very concerning omission and are suspicious that it may be symptomatic of an underlying lack of commitment to safety within the project.

We strongly object to the project's impact on public safety and our ability to move around apparently being ignored by the developers.

A conclusion is drawn in C6.3.14.1 ES Appendix 14.1 Transport Assessment that “The Site is in a suitable location for the Scheme in terms of transport”, but the supporting documents do not present the traffic loadings through the centre of Stow on the B1241, and nowhere is an overview presented of Solar Fields' construction traffic together with traffic for construction of the cable route and construction worker traffic along the roads on which the accesses lie. **So, the conclusion is not supported by relevant facts and is deliberately misleading in its presentation and representation.** We expect that inclusion of all relevant traffic routes in the safety and delay assessments will reveal much more disruption in and around Stow than the incomplete and misleading data in the Applicant's' reports portray.

The reports appear to have been written around a pre-determined conclusion and are so fragmented, and in places incomplete. This makes it very difficult for the reader to interpret what is being proposed and is again misleading in its presentation. Either way SPC does not accept their conclusions.

We would draw your attention to the Environmental Statement: Chapter 13 Cultural Heritage: 13.4.21 and 13.4.22, which address the importance of avoiding damage to Scheduled Monuments and 13.7.12, on heritage assets and construction routes, which points out that: "It should be noted that there is the potential for a direct physical impact upon one Scheduled Monument during the construction phase, this being due to the abnormal loads oversailing as they pass through the village of Stow. The Order Limits indicate that this would be immediately adjacent to the churchyard wall, which forms the boundary of the Site of a college and Benedictine Abbey, St Mary's Church (NHLE 1012976). This has the potential to result in impacts of Minor or Moderate Adverse magnitude and therefore effects of up to Large Adverse significance should any damage to the churchyard wall or archaeological remains beyond occur. Mitigation measures to ensure that this does not occur are discussed below in Section 13.8".

Environmental Statement Chapter 13 Cultural Heritage Paragraph 13.8.5 states:

"The only potential direct physical impact to a designated heritage asset is the potential for damage to the wall of the churchyard at the Site of a college and Benedictine Abbey, St Mary's Church (NHLE 1012976) during construction. This is due to the fact that HGVs delivering abnormal loads will need to mount the pavement adjacent to the Scheduled Monument, but this can be mitigated by the close monitoring of these maneuvers by a suitably qualified banksman to ensure that this potential adverse impact can be avoided."

How exactly would a qualified banksman ensure that any impact would be avoided? If, once the 16-axle vehicle starts to try and maneuver round the first corner and it becomes obvious that despite the best efforts of all involved it will not fit past the wall without causing any damage, what will the banksman do? Supervise it reversing and going back?

The potential effect of the 249 tonnes 'Abnormal loads' on the foundations of the entirety of the Monument is not addressed. As stated above, the Applicant is also silent concerning the liability for any structural damage to this and/or private dwellings and the process by which compensation for such impacts will be addressed over the whole lifecycle of the proposed project.

If the mitigations are not adequate, and significant damage is done to these buildings – who has the liability and what will be the insurance limit required to repair such a historical monument? Again, the Applicant is silent on this issue as the only reference to protection of buildings appears at Part 4 section 18 of the draft Development Consent Order and is not relevant here.

The current access points proposed by developers mean that both construction and maintenance traffic is directed along narrow, minor roads such as Ingham Road/Stow Road. Young people use Ingham Road to get to the crossroads in Stow to catch the bus to senior school in either Lincoln or Gainsborough. The road is in part a single

track with a 7.5 tonne weight limit along its full length. The applicant is by-passing this weight limit by stating their use is “for access only”, which is disingenuous due to the size and sheer volume of the traffic which will be utilising this route. There have been numerous accidents and fatality on this route already in recent years.

The proposed access routes also pass through the villages in Stow Parish to reach their destinations. This pushes all traffic, including the temporary and permanent closure and/or alteration of roads onto surrounding residents. Due to the proposed ‘temporary’ restrictions of Ingham Road/ Stow Lane and Fleets Road the alternative routings for local residents will be time consuming and far busier than your vehicle surveys carried out in 2021 evidence.

We strongly oppose these traffic management plans that have not been adequately thought through in terms of their impact and damage to the local communities and roads.

We believe the proposal should have all traffic associated with the project, routed along internal roads constructed within the project area, with access via one or two entrances as close as possible to the A-class roads bordering the project area. Looking at the maps, this proposal is eminently feasible, albeit at additional cost to the Applicant.

Biodiversity

We note the reports for Biodiversity Net Gain, but again these are constructed in a manner that is generally misleading and misrepresents the actual impacts of the project from start to finish. The assessment does not address the immediate and negative loss of the current levels of biodiversity in the local area, including the many rare and endangered species of birds, butterflies and amphibians, as well as protected species such as bats, owls and swans. These flourish in an area that is quiet and in the main undisturbed by high numbers of people or traffic. This project will undoubtedly destroy existing natural territories, demolish safe haven corridors, and drive away animals from these areas. The same will be true once hedgerows are ripped up, and the natural plants and flowers of this area are destroyed. In the event that the Cottam Solar Project is accepted for development, a condition should be imposed that the replacement wildlife habitats proposed should be created and allowed to mature before the existing habitats are removed. This will allow the affected wildlife to migrate to the new areas, rather than leave the area or simply die.

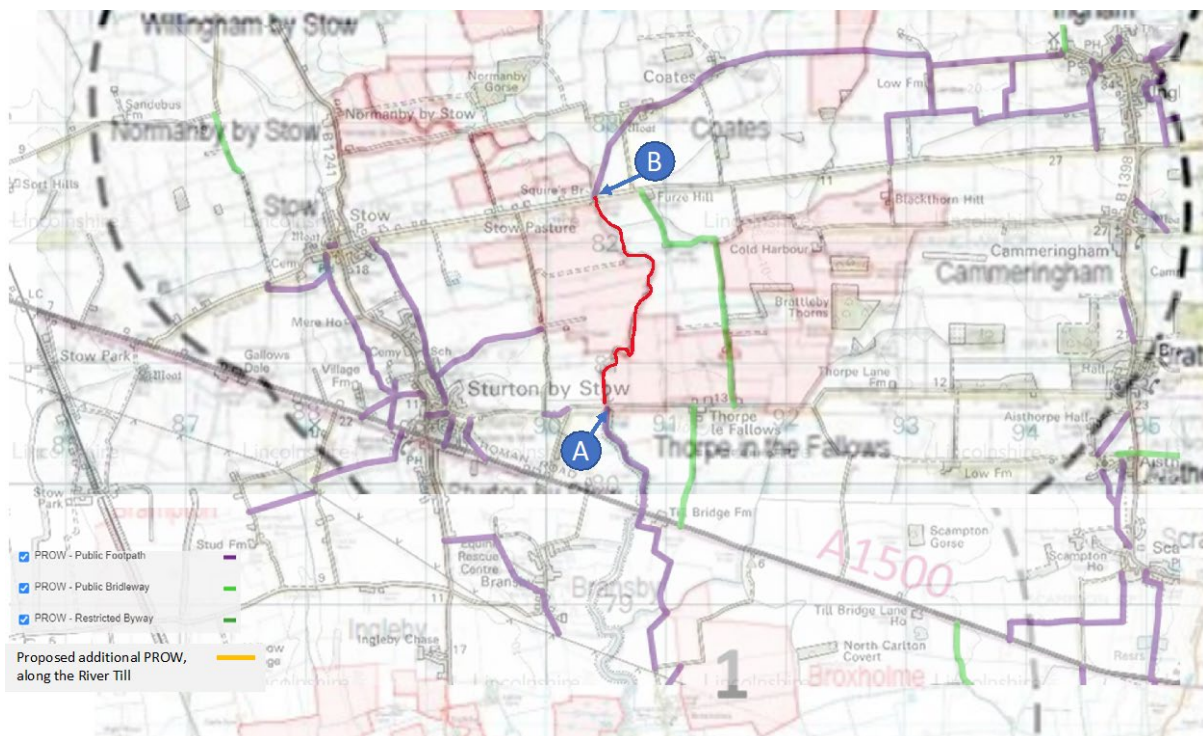
The Applicant previously suggested there was the potential to create a large wetland alongside the river Till to the east of Sturton by Stow, which would enable local residents and visitors to the area to enjoy wildlife and to (re)create some of the lost wetland. This offer was made during the Consultation Periods in a meeting between Sturton by Stow and Stow Parish Councillors and Lanpro and Lizlake in February 2022. It was also suggested it could potentially bring economic benefits too, drawing in new visitors to the area that would utilise local services – provided the general public is granted access to them. However, although when compared to the scale of the Applicant’s Solar project proposals, this would be wholly inadequate, we are very disappointed to note that despite initial assurances by the Applicant, this proposal was not included in the application.

Walking, riding, and Cycling Routes

One of the aspirations of our Neighbourhood Plan, in Policy 15, is the creation of new footpaths, and one is provided just to the north of Stow, linking through to Fleets Lane, which is appreciated.

Sturton by Stow and Stow Parish Councils have, independently, asked for a permissive path to be created which would run between Thorpe Bridge (Western side ideally) along the ridge of the River Till riverbank over the Bridge on Ingham Lane (Squires Bridge) to the northern end of Green Lane thence to its intersection with the B1241. See map below, points A and B respectively. We discussed this in the February 2022 meeting with Lanpro and Lizlake and pointed out that as the banks of the River Till are elevated by flood defences, they provide a raised platform on which to walk, and would thus enable observation of both the wildlife of the Till and to see over the panels to the views beyond. This should be achievable but has not been addressed by the developer. We have been informed that this is due to objections by the landowner who Lanpro say maintains that “opening up of any further access along the river corridor would not be compatible with the current farming operation”. Whilst we view that with considerable scepticism, the Applicant has told us that the landowner’s objection means that they cannot pursue this linking of walking routes.

With reference to the following map, we believe that the section of our request for access for walkers between points A (the bridge on Thorpe Lane over the Till) and B (Squires Bridge on Ingham Road) is still worth including as an amenity to residents as it would link two existing PROWs. This would materially improve access to the Countryside.



The EIS Chapter 14 ‘Transport and Access’ indicates on page 12 that “Following feedback received during consultation, the use of this Green Lane for construction

vehicles is no longer part of the Scheme.” This is a step in the right direction, but the developer has retained this in the application as an access route for the operational phase of the project.

Green Lane is an ancient and very popular walking route. It passes through open countryside where wild deer, butterflies and many birds are frequently observed. It currently remains a grassy track and is not a suitable place for operational access. Green Lane is adjacent to an old, occupied dwelling, which would be structurally impacted by routine heavy traffic. The developer is silent on who is liable for any subsidence or structural damage during the lifetime of the project. We strongly oppose the use of Green Lane for any traffic; it should be left as a grass track.

Field E1 at the North end of Green Lane would appear to be the only solar panel field that operational traffic could need to use the Lane to access, but this field can also be reached from the west via Coates Lane and from the south via the access road to Coates from Ingham Road and thence along Coates Lane. Note that both Coates Lane and the access road to Coates are already asphalted. In view of this we strongly object to the current plans and propose the use of Green Lane as an operational access to be deleted from the scheme as it is inappropriate and not required.

Community Benefit

During the initial consultation periods by Island Green Power, residents were encouraged to bring forth ideas for community projects, but we are not aware of any further discussions.

There is scope for significant investment prior to and during the construction phase as well as ongoing contributions during the lifetime of the project. Given settlements made regarding other forms of energy development and the scale of this project overall we might expect a substantial initial funding donation and then regular (inflation proofed) payments annually. This would be managed by a committee including local residents of the affected Parishes and disbursed to all the communities affected by Cottam 1.

During the consultation phase, a number of residents raised the financial impact they will suffer as a result of house price depreciation and the inability to sell, caused wholly by being surrounded by solar panels and the damage and pollution caused by the construction traffic, and we are aware that this has already become a reality. Despite the obvious financial benefits afforded to the Applicant, they have been silent on the matter of compensation for impacted residents within the Parish.

Conclusions

Members of SPC and many local residents in principle support the development of solar power, but this collection of proposals raises a number of significant concerns:

- The viability of the project in terms of lifecycle carbon footprint has not been demonstrated. We feel that the project should not be allowed to proceed until it is demonstrated to produce a significant contribution to achieving the Government’s net-zero ambition:

- The sheer number of projects currently under consideration, which would significantly change the character of the area to the detriment of local residents, and the agricultural and tourism industries;
- The loss of productive agricultural land and the jobs associated with it;
- The loss of green spaces that are well used recreational facilities for local residents and visitors; walking and cycling routes for the benefit of health and well-being, and Green Lane that is unnecessarily included as an access route for the operational phase of the project;
- The immediate negative impact on wildlife and biodiversity must be mitigated. These routes, paths hedgerows and trees have provided safe haven, and hunting grounds for many 100's of years, and yet over 24 months this will be destroyed. Alternative habitats must be constructed far enough in advance of the start of construction that they will be mature for wildlife to migrate into it when construction starts.
- The negative impact on residents of the increase in volume and size of traffic plus the road closures caused by the Abnormal Loads during the construction phase of both the solar fields and the cable route.
- The inconsistencies between the Transport Assessment in Chapter 14 of the Environmental Statement and its Appendices, and salami-slicing of the Cable access traffic so that it is excluded from the Safety and Delay assessments is a failing at best and misrepresents the project impacts within the developer's proposals. This, and the failure to present an overview of all the traffic (i.e. that for the solar fields and for the cable route), and the omission of traffic past the local school and through the centre of Stow Village, leads us to think that the Safety and the Delay assessments are neither reliable nor accurate. We would like to see these facets independently assessed and the new assessment published for public scrutiny before any permission is granted for the project to go ahead.
- We are concerned about the risks to a Grade 1 listed scheduled monument – St Mary's Church and associated artifacts – due to very large and heavy construction traffic planned to pass immediately adjacent to it. The movement of the proposed Abnormal Loads may be feasible dimensionally, but the project should be required to demonstrate to independent experts that there will be no damage to the foundations of the Monument or to those of the houses adjacent to their route.
- We think the alternative of much greater use of roads internal to the project areas and accessed as much as possible from A-class roads, should be actively pursued, particularly to reduce the volume of traffic along Stow Lane/Ingham Road.
- The potential inappropriate placement of panels or sub stations adjacent to scheduled monuments.
- The non-adoption of our very reasonable request for walker access to one or both banks of the River Till bank, to link together existing walking routes. The explanations provided are hard to accept.
- The Applicant is silent on their financial liability for damage to listed monuments and dwellings during the lifetime of the project, together with financial compensation for those individuals negatively impacted by the project and its construction.

- We seek clarity on what community financial benefit will be offered should any of the proposals proceed.

Should all of the above points be resolved to SPC's satisfaction, we would support the project. As the Applicant's proposal currently stands, we strongly oppose it.