From: Carol Gilbert < @gmail.com>

Sent: 07 June 2023 23:20

To: Cottam Solar Project

Subject: Sturton by Stow and Stow Neighbourhood Planning Group **Attachments:** Neighbourhood Planning statement for Cottam 1 NSIP.docx

Categories: Deadline, HEO

Dear Planning Inspectors

Relevant Representation:

Registration Identification Number 20036987

Sturton by Stow and Stow Neighbourhood Planning Group has taken time and care to produce the attached document. We respectfully request that it is uploaded onto your portal as a Relevant Representation document to be considered when you are assessing the proposed Cottam Solar Farms.

Kind regards

Carol Gilbert

Chair, Sturton by Stow and Stow Neighbourhood Planning Group

Introduction

This report sets out the work of the reconvened Sturton by Stow and Stow Neighbourhood Planning Group, who have been considering the proposals regarding the recent spate of applications for development of solar farms. There are now applications regarding: Cottam1, 2 and 3; West Burton 1, 2 and 3; Gate Burton; Tillbridge Solar and Stow Park (Luminous), three of which affect our parishes, particularly Cottam 1.

The Government's drive for a zero-carbon economy by 2050 is supported by the Parish Councils of Sturton by Stow and Stow but, the central part to achieving this goal is the right balance being achieved between the scale and location for renewable energy infrastructure and loss of our valued heritage, landscapes and biodiversity. These schemes must not overwhelm rural communities. Any development on this scale will create a major change for residents in the landscape.

To help manage the impacts of renewable energy developments, Paragraphs 155 (a) and (b) of the NPPF state that Local Plans should be taken into account. The Central Lincolnshire Local Plan 2022 is not helpful regarding solar PV energy developments and therefore does not provide the framework for guiding such large-scale schemes. Our Neighbourhood Plan does not anticipate and was not written to incorporate concurrent large-scale applications for commercial solar PV farms. However, the aspirations of the residents in many relevant regards (eg. Conservation of heritage assets, enhancement of biodiversity, access to the countryside etc) are very clear in our Neighbourhood Plan, which was adopted, following a successful examination and referendum, in July 2022. The note in the developer's application, which seems to confer a positive stance to large commercial solar farm developments, is incorrect and should be dismissed.

The area

The parishes of Sturton by Stow and Stow reside in the district of West Lindsey.

As indicated in our Neighbourhood Profile; The East Midlands Regional Landscape Character Assessment (2010) places our Neighbourhood Area within the Character Area dubbed "Unwooded Vale", a large area that includes almost the whole of the flat areas enclosed on the west by the floodplain valley of the river Trent and on the east by the limestone scarps and dip slopes of the Lincoln Edge. West Lindsey District Council's Landscape Character Appraisal Study (1999) presents more in-depth analysis of the geology of the parishes; The study endorses 14 different Landscape Characters which give strategies for specific areas and how to sustain and reinforce the environmental landscape of the area. The designated Sturton by Stow and Stow area is the Till Vale.

There is a protected zone between close adjacent settlements, such as Stow and Sturton by Stow, to prevent coalescence and ensure that individual landscape settings are conserved.

Within our parishes, in the area covered by the Cottam and West Burton 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 a number of Grade 1 and 2 listed buildings, on construction routes or cabling chiefly:

- 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;
- The Cross Keys;
- 2, Stow Park Road, Stow;
- 3, Normanby Road, Stow.

In addition, the new proposed construction route is over what is believed to be a ridge and furrow field to the east of the Normanby Road leaving Stow village.

The proposed location of solar panels in the area around Coates cannot be seen in any way to "preserve or enhance the character or appearance of the historic settlements, listed buildings and their settings".

Construction

We would draw your attention to paragraph 13.5.1 of the Environmental Statement: Chapter 13 Cultural Heritage: 13.4.21 Paragraph 5.8.14 of NPS EN1, 13.4.22 Paragraph 5.8.15, and 13.7.12, which cover our heritage assets and construction routes.

There are major concerns about the impact of the construction phase. The proposed route brings large vehicles through Stow, northwards along Normanby Road, round some narrow bends before cutting across a ridge and furrow field. The narrow bends go past St Mary's Scheduled Monument.

Section 13.8. – in particular 13.8.5 "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 manoeuvres by a suitably qualified banksman to ensure that this potential adverse impact can be avoided."

Is this really adequate protection of a such an important site? Perhaps an alternate route should be sought.

The large number of access points currently proposed means that a high volume of construction and maintenance traffic is directed along narrow, minor roads and through villages to reach their destinations within the project's boundaries. This places the burden of traffic, including the permanent alteration of roads, onto surrounding residents. Traffic associated with the project could more appropriately be routed along the internal roads constructed within the project area, with access via one or two entrances as close as possible to the larger public highways bounding the project area. This would transfer a lot of the nuisance from the surrounding, non-project areas to where it belongs – inside the project's boundaries. Looking at the maps, this proposal is eminently feasible – indeed routing the construction lorries along internal roads is part and parcel of the proposals for Cottam 1 North and Cottam 1 West.

Biodiversity

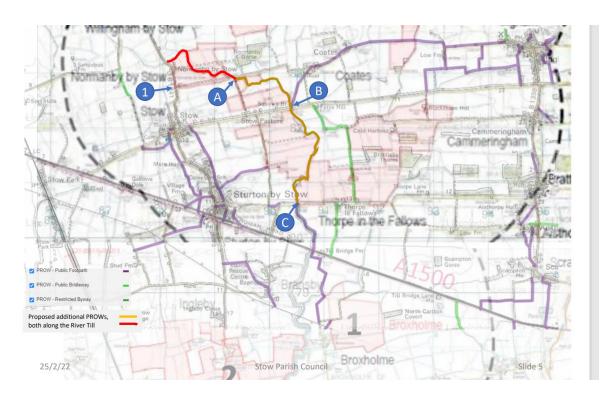
Document EN010133-000112-C2.11 Important Hedgerows and the Development Consent Order Rev A. The removal of H275, H278, H279 and H280 is not supported in any way through the Neighbourhood Plan. There appears to be no pertinent reason for removal of these particular hedgerows. Construction traffic would be easily controlled by visual means; traffic lights or banksmen. Thorpe Lane, Sturton by Stow is used by large agricultural machinery and grain HGVs without problem. This road will be adequate without the need for hedgerow removal.

We note the reports for Biodiversity Net Gain but despite demonstrating a large BNG for Cottam, which is to be applauded, most of it will not be accessible and therefore enjoyed by local people. The developer is missing the opportunity to showcase how large solar developments could enhance the lives of local people affected by such developments. By providing the community with access to nature that would improve their well-being and reconnect them to nature so that they will value it and want to protect it. There is the potential to create a large wetland alongside the river Till to the east of Sturton by Stow, which would enable people and visitors to the area to enjoy wildlife. This suggestion to (re)create some of the lost wetland was made during the Consultation Periods in a meeting between Sturton by Stow and Stow Parish Councillors and Lanpro and Lizlake. Furthermore, it could potentially bring economic benefits too, drawing in new visitors to the area that would utilise local services.

Public Amenity Space

One of the aspirations of our Neighbourhood Plan (see Policy 15) is the creation of new footpaths. 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. We mentioned this in the 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 thus observe both the wildlife of the Till and see over the panels to the views beyond. This should be achievable but has not been adequately addressed by the developer. Coates Lane and Green Lane (Stow) will effectively be lost due to Construction Traffic and blocked views due to the high panels planned too close to walking routes.



Community Benefit

During the initial consultation periods by Island Green Power, residents were encouraged to bring forth ideas for community projects but it would seem that this has been disregarded and, as far as we are aware, no genuine discussions have been held.

There is scope for significant investment prior to and during the construction phase as well as ongoing contributions during the lifetime of the project. We would expect somewhere in the region of £10,000,000 (£10 million) as an initial funding donation and then regular payments annually. This would be managed and accessed by the communities affected by Cottam 1.