

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

7th June 2023

Dear Planning Inspectors

Statement Regarding Cottam Solar Project- Sturton by Stow Parish Council

Sturton by Stow Parish Council wishes to register the following observations for Cottam Solar Project. In particular Cottam 1 South.

We would make note that we are not against solar PV per se; but the sheer scale and mass of the **five** projects in the area begs the question whether this is sustainable in the long-term considering the huge amount of land required for all of the projects; Cottam, West Burton, Gate Burton, Tillbridge Solar and Luminous Energy (Stow Park).

We would also wish the Inspectorate to note that the Sturton by Stow and Stow Neighbourhood Plan, which was Made in May 2022 and is positively prepared regarding renewable energy, is for **residential scale** renewables ie solar PV on roof tops and air source heat pumps. The NP steering group did not and could not have realistically be expected to have foreseen, applications for commercial solar farms of any scale; let alone the five proposals currently at differing stages of application. Therefore, 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 overwhelming number of documents is not only time consuming; it is also difficult to compare the information. Does the Planning Inspectorate recognise that many people may have difficulty in accessing the information?

The number of plans illustrating details such as; draft planting scheme, hedge removal, likely vehicle routes etc are difficult and awkward to read. Could some documents showing the overall effect be made available?

Our main focus is the draft Consent for Development Order (Rev A). It raises many questions;

1. The whole Cottam site (1,2,3a and 3b) within the boundary marked in red and coloured pink is potentially subject to compulsory purchase at any point within 5 years of the Order being signed. The inference from Island Green Power (IGP) is that landowners have already agreed to lease their land for PV solar panels. Why does the draft Order need to include leased land in a compulsory purchase option?

2. There are no restrictions from compulsory purchase in the event that this project is subsequently sold to a new developer within the five-year timescale.
3. The ecological survey and PIER reports infer that a biodiversity net gain of 70-96% is achievable. *“A detailed Biodiversity Net Gain assessment has been carried out to support the DCO application. It is concluded in Appendix 9.12 [EN010133/APP/C6.3.9.12] of the ES that the Scheme will result in a significant Net Gain for biodiversity, with 96.09% gains provided in habitat, 70.22% gains in hedgerow and 10.69% gains in river units, in line with local and national planning policies”*. However, there is insufficient detail to demonstrate how this may be achieved. The mitigation and compensation thus far described appears to be the least possible gain within the development footprint and fails to demonstrate the significant gains that could be realised that would also benefit local people and visitors, boosting the local economy. It also states that hedges/trees will be allowed to grow in order to enhance the biodiverse properties of the areas. *“During pre-application consultation (14/02/2022) with Sturton by Stow Parish Council (SSPC), the presence of the River Till ecological restoration corridor was pointed out as an opportunity for BNG.”*- **C6.3.9.12 ES Appendix 9.12 Bio Diversity Net Gain Report**; Whilst the comments in this report are encouraging to achieve BNG, the DCO application is at odds with the proposed enhancements with largescale hedge and tree removal.
4. The Consent Order specifies a significant number of hedges be removed. Some of the hedgerows which are marked to be removed are classed as potentially important as well as important. Hedges are a priority habitat, and every effort should be made to retain them, especially those that are well established and afford excellent habitat for wildlife already. Whilst it is easy to replace hedgerows, they take many years to attain a degree of development where they become valuable for wildlife. The developer should be clearly demonstrating why it is necessary to remove any hedgerow and clearly show how they will over-compensate for losses. Document EN010133-000112-C2.11 Important Hedgerows.
5. We particularly **OBJECT** to the removal of the following specific hedgerows as stated in the Development Consent Order Rev A and document EN010133-000112-C2.11 Important Hedgerows Plan;

H275 Thorpe Lane – This hedge is located along the southern boundary of Thorpe Lane and is not within the development area. The road is bounded by ditches each side. The highway is adequate for large agricultural machinery and large grain transport HGV's; The hedgerow is largely separated from the road by a wide grass verge and ditch and there appears to be no gain in removal of this particular hedgerow

H278, H279, H280 The removal of these hedgerows will have significant visual impact from Sturton by Stow and for the residents of Fleets Lane Cottages. The hedges form a boundary to fields which will not be part of Cottam 1. The advantage of windbreak from the hedging to reduce soil erosion will be

compromised, let alone the disaster for wildlife which relies on this habitat. There appears to be no pertinent reason for removal of these hedgerows.

6. The Consent Order makes reference to trees, including those protected by TPO, being removed. Which trees are subject to being removed? The surrounding area has very little tree cover and the destruction of these trees is more than unfortunate. Tree removal should be demonstrably last resort with a clear rationale, and no veteran trees removed under any circumstances. All tree removal should be significantly over-compensated for.
7. Where are the proposed 20 kilometres of hedgerow to be established? The drawings are difficult to study, therefore it is impossible to comment adequately.
8. The consultation reports make great effort to acknowledge the creation of a permissive path – only one – this is being created to mitigate the closure of a public footpath in Stow. Surely there is much more scope to create walking routes, even if they are permissive for the duration of the project? There is an opportunity to create footpaths, permissive or PROW to add value for residents and visitors alike. Footpath Stur/80/1 will be impacted when Thorpe Lane is closed as per the public rights of way plan **C2.5 Public Rights of Way Plan – see page 14**. We note that the draft DCO Revision A no longer states this road is to be permanently stopped. We welcome this as there was no reasonable rationale for permanently stopping up this highway.
9. 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. This should be achievable with little impact to the development itself since IGP have already stated they will not be developing within 10m of the river bank. Although IGP have seemingly used this as an opportunity to absolve themselves of riparian responsibilities, which they must not be able to do.
10. There is little information regarding actual schemes of planting apart from maps which are impossible to read; A written scheme of planting would be useful. Where are the wildflower meadows, swales and other 'net gains' to be created? The biodiversity planting drawings are incredibly difficult to read. Will there be an opportunity for largescale maps to be made available for each local area? The difficulty accessing detail makes adequate comment impossible. The developer has an opportunity here to showcase how large scale solar can deliver significant beneficial outcomes for nature in an area that is nature depleted. They could create new habitats over and above that required and could provide a valuable asset for local people to enjoy, which could attract visitors to the area with associated knock-on economic benefits. This development should not be approved unless the developer clearly demonstrates that they can and intend to do this.
11. Sturton by Stow Parish Council has grave concerns that not only a huge area of land will be lost to agriculture for a significant period of time but that the area will be changed beyond recognition by the removal of hedgerows and trees.

We require absolute assurance that this land will be returned to agriculture once solar PV is no longer on site, other than those areas where habitats have been created as alluded to in point 10.

12. The closure or traffic management of some of the roads, even temporarily, will have significant impacts on residents. Whilst we understand traffic management, due to the additional high volume, will be necessary because of the nature of the development, please do not underestimate the flow of traffic along A1500. This is a major route and diversions will add significant time and distance for commuters. The potential closure (Streets Map Plan) of B1241 in the centre of Stow is concerning. What is to be gained by this? The applicant seems to have no idea of the inconvenience which will increase journey times and distances. This may be rural Lincolnshire but we still have many vehicles on our roads.
13. The aspect of restitution and compensation has not been addressed in any meaningful way. There is note of contact between Lincolnshire and Nottinghamshire charities whom administer grants and Island Green Power. There is also note of creating a community group, although detail is scant. During the initial consultation periods residents were encouraged to bring forth ideas for community projects but it would seem that this has been disregarded and no genuine discussions have been held. We had suggested that our public buildings could be fitted with their own solar PV panels.
14. 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 somewhere in the region of £10,000,000 (£10 million) as an initial funding donation and then regular payments annually. This figure is based on the amount of energy likely to be produced by Cottam solar and to be used for community benefit for those communities impacted by the Cottam solar project. IGP have compared their energy production to the now defunct Cottam 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 see no reason to not insist on 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 35 years.