

Submission from B & P Duncan

As residents of Stow Parish for over 40 years we are extremely concerned about the potential impact of these proposals upon the area for residents, businesses, wildlife and visitors. There has been a spate of applications for development of solar farms in our area, primarily Cottam1. It feels overwhelming.

While in principle we support the development of solar power, 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 support the drive for a zero-carbon economy by 2050, but the right balance needs to be achieved between the scale and location for renewable energy infrastructure and loss of our treasured heritage, agricultural land for food, landscapes, biodiversity, and access to the countryside for health and wellbeing;
- The sheer number of projects currently under consideration would significantly change the character of the area to the detriment of local residents, agriculture and tourism; The use of the fields for agriculture gives a landscape and the presence of a significant number of panels would present a very different aspect;
- 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.
- 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 as is the lack of an overview of all the traffic and the omission of traffic past the local school and through the centre of Stow Village.
- We are concerned about the risks to a Grade 1 listed scheduled monument – the Benedictine Abbey and college at St Mary’s Church – and of locally historically significant houses - 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 the request for walker access to one or both banks of the River Till bank, to link together existing walking routes.
- There is no information as to the financial compensation that may be available to church authorities and households 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.
- What community financial benefit will be offered should any of the proposals proceed?

The Neighbourhood Plan talked about promotion of renewable energy in residential developments. It did not support large scale industrial solar development; the reference in the developer's application is incorrect and should be ignored.

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)

as well as 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.

We are pleased to see that amendments to the plans have been made based on Phase 1 and Phase 2 consultations including the acceptance of the need to protect Green Lane and removal of some of the fields adjacent to people's homes and initially allocated for panels.

The volume and complexity of, and lack of a layperson's perspective, in the documentation has made the application very difficult to understand in places. In our view this renders the overall consultation inadequate. 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 were pleased to note from the EIS Chapter 14 page 12 that Green Lane, which is a popular walking route, is no longer proposed as a construction route, and fewer panels are now proposed alongside it. However, closer reading of the documents reveal that it is still intended to use the northern part of Green Lane for access – why, when there are alternatives from Coates Lane? We are strongly opposed to the proposal that Green Lane is retained as an access route for the operational phase of the project.

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.

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 concerned to note that questions concerning the effect of the project on food production and employment opportunity in the agricultural sector, and on industries such as tourism, have not been addressed.

We have major concerns about the impact of traffic for the construction phase.

The proposed route for 20% of the Heavy Goods Vehicles for the Cottam 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, to the Substation, the Cottam 1 West solar fields, and the three cable route accesses are routed through Stow, and in doing so pass very close to private houses and to the Scheduled Monument of St Mary's Church.

There does not appear to be any assessment of the effects of the very heavy vehicles proposed on the foundations of the Scheduled Monument, and on the private houses adjacent to the route. We would like independent structural experts to assess the potential for damage to the Monument and houses adjacent to the route, and for the issue of liability for damage to be made crystal clear.

We would support the concerns raised by others e.g. Stow Parish Council on transport. "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 routings of construction traffic to the solar fields and uses these routes for the Safety and the Delay assessments, but these routings differ from those provided in Appendix 14.2. In the summary report, the "Study Area" routes for access to Cottam 1 West do not include the B1241, whilst the routes indicated in Appendix 14.2 do. This is of prime importance to us, as the B1241 passes through the centre of Stow, and past the Sturton Primary School, which many of the local children attend. The Appendix 2 routings are credible, as they include the routes to solar field Access points 10, 11 and 13 and to cable route accesses 114, 115 and 119.

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 shows this possibility, though this is inconsistent with the description of the route immediately before it. Perhaps the traffic will be divided over both routes?).

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 consider this a callous omission, and are very concerned that it may be symptomatic of an underlying lack of commitment to safety within the project.

Project traffic would also pass through the centre of Stow and Normanby. This traffic includes the cable route traffic with its HGVs, and Abnormal Loads, the huge and heavy Abnormal Loads for the delivery of transformers, and the various lorries, tippers, buses etc. associated with both the cable route and the solar panel field construction. We strongly object to the project's impact on public safety and our ability to move around 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 current developer's reports portray."

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.

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 manoeuvres by a suitably qualified banksman to ensure that this potential adverse impact can be avoided." Is this seriously considered an adequate response?

The potential effect of the 249 tonne 'Abnormal loads' on the foundations of the entirety of the Monument is not addressed nor the process by which compensation would be addressed.

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, a significant part of which is referred to as 'the narrows' as it is single track with passing places and it has a 7.5 tonne weight limit. Local farmers are used to it but not long ago a large vehicle transporting a crane went in the ditch. The resulting diversion impacted greatly on residents trying to get to work or get services to patients and it took some time to have it fully restored.

We strongly oppose these traffic management plans; they would result in damage to the roads and disruption to the traffic both of local residents and those of the project. Why not route more of the traffic across roads constructed within the project area, with access via one or two entrances as close as possible to the A-class roads bounding the project area.

We note the reports for Biodiversity Net Gain, 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.

There is the potential to create a large wetland alongside the river Till to the east of Stow and Sturton by Stow, which would enable people and visitors to the area to enjoy wildlife and to (re)create some of the lost wetland. Unfortunately, whilst initially well received, this proposal has not been included in the application nor has the suggested development of a new permissive path alongside the Till.

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 it is retained 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. We strongly oppose the use of Green Lane for any traffic connected to the project; it should be left as a grass track.

A consultation meeting included information about Community Benefits, but we see little information about it now yet the loss of our present environment surely warrants significant compensation by way of financial investment in the area affected. Likewise financial compensation to individual residents immediately affected either during the construction phase or beyond.