

# **COTTAM SOLAR 1,2, 3a and 3b –EN010133**

**19 AUGUST 2024**

**IP 20037189**

My response below to the Secretary of State for Energy Security and Net Zero, due to limited time constraints, contains areas that correlate to each other, however, some of the reference headings I have used may / may not be confined to the documents submitted by the Applicant and/or Other Interested Parties as requested on 19 July by the Secretary of State. The headings are, however, contained within documents submitted by the Applicant for the Cottam Solar Project and are therefore of relevance to the following.

Cumulative Effects, Construction / Decommissioning - Transport and the Outline Operational Environmental Management Plan Revision E August 2024 – Waste.

**It is of huge importance in deciding whether or not to consent Cottam Solar to note that ONE THIRD of Lincolnshire is below sea level – this is a county vulnerable to flooding, a food producing county, a county where agriculture and tourism are its heart.**

## **CUMULATIVE EFFECTS**

Documents submitted by the Applicant, Island Green Power, to the Planning Inspectorate over the past two years have been a disturbing read and confirm all the unease I and residents have over the magnitude and repercussions of this aggressive and ruinous project to all aspects of life within the 30 affected communities and who feel the County of Lincolnshire is being unfairly specifically targeted. Not only the Cottam Solar project but the cumulative effects of Gate Burton Solar (approved by the Secretary of State in July), West Burton Solar 1, 2 and 3 and Tillbridge Solar which amount to 10,000 acres and since learn of another NSIP, One Earth Solar which will cover a further 4,000 acres of farmland (and now totals 14,000 acres), five projects all within a radius of six miles is completely overwhelming and beyond unfair. Individually each Project is of such magnitude that combined they are almost 20 km (over 12 miles) from one end to the other with a perimeter stretching over 80 km (50 miles). It is nothing to do with NIMBY. I am in favour of solar on brownfield sites, warehouse roofs, domestic and commercial roofs, car parks etc.

Potentially in excess of 25,000 acres of Lincolnshire's food producing agricultural /farmland could be lost to NSIP industrial scale solar projects that are either with the Planning Inspectorate or are coming forward and which inevitably will be sold on to faceless, foreign investors with profits going overseas and no financial benefit to the UK Government from taxes. Island Green Power confirmed at the Willingham open day that they intend to sell off the project immediately they achieve DCO. In so many other respects they misled the public from the outset.

***It is of concern for all that we will have to import more expensive food to feed ourselves if "the new harvest from Lincolnshire's top grade food-producing land is to be electricity for sale abroad".***

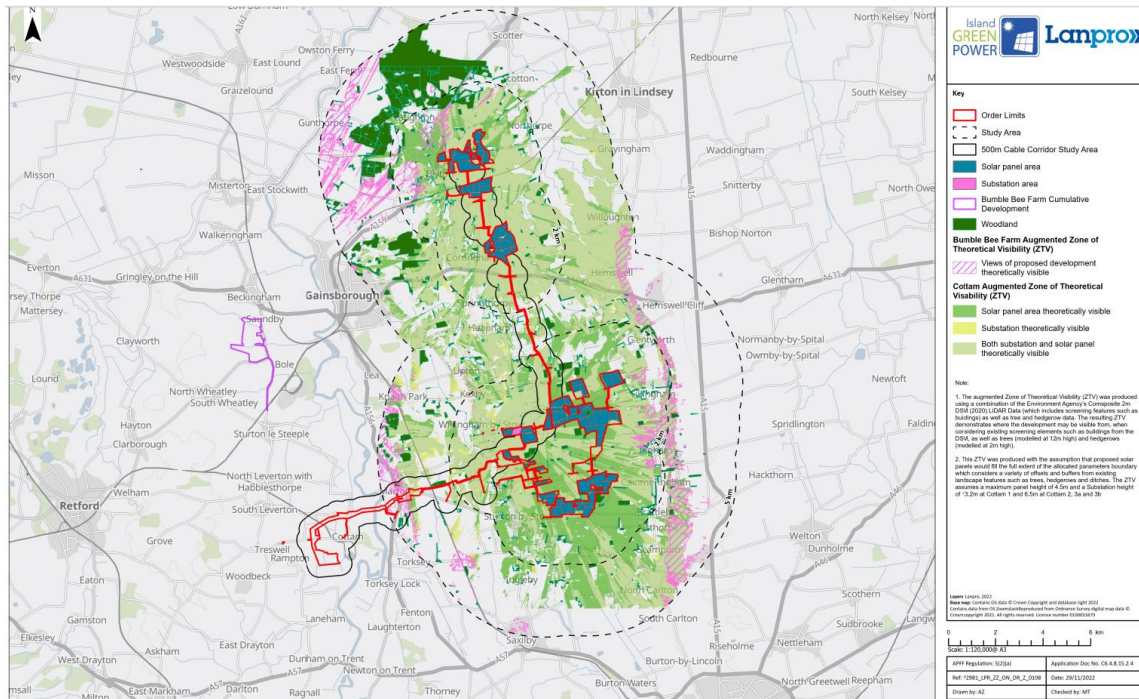
We have an Agricultural College less than 7 miles from this proposed project. The 2 day Lincolnshire Agricultural and Horticultural Show takes place annually, bringing in 60,000 plus visitors and exhibitors, again only 7 miles from this proposed project. The ancient City of Lincoln which relies on tourism is only 10 miles from Cottam Solar and the other 3 – 4 proposed solar projects.

## **Cumulative Effects 8.10.1**

The Applicant states:

*"At one viewpoint someone looking at the view in one direction may see all the projects at the same time, or someone turning through the whole 360 degrees may see different developments in different directions and sectors of the view in succession. Users of linear routes, especially footpaths or other rights of way, or transport routes, may potentially see the different developments revealed in succession as a series of sequential views. Both types of experience need to be considered where they are relevant".*

The image below is the Cottam Solar Project showing the vast area of the views (coloured green) that will be affected by this one project alone.



## CONSTRUCTION/DECOMMISSIONING

### Transport

#### CABLE ROUTE CORRIDOR & TRANSFORMER DELIVERIES

As the Applicant states the decommissioning of the Cottam project will not be dissimilar to the construction phase it is important to note there will be continual disruption (2 years for the cable route corridor construction alone) to the immediate locality and beyond from the high volume of vehicle journeys for delivering cable drums and transformers to site / compounds from Abnormal Load Vehicles (ALVs), 100 cable drum deliveries (*is this number dependent on the cable drum size ?*), for each section of the 27.5km cable route corridor alone just for the Cottam project is beyond comprehension - 27.5km is a colossal distance from the Grid connection. Both for construction and decommissioning the unquantifiable number of HGVs (and other site vehicles) travelling along highways and through villages on narrow inter-twining single lanes with their soft grass verges which are totally unsuitable not only for ALVs but HGVs, with the consequent annihilation of the area ie removal of bollards, signs, electricity poles, trees/hedgerows is inconceivable notwithstanding any other structure / obstacle in the way the Applicant has yet to discover and the possibility of changes to the infrastructure in 60 years. Carrying out desktop studies for this and other elements of the project is not a true representation of the topography and its features when there is so much at stake for the communities en-route, particularly where there are important historic heritage assets for example, St Mary's Church (Stow Minster) in the village of Stow that are at risk of harm.

**4.29 For the construction of the Cable Route Corridor, the Applicant states: 32 temporary accesses are required, approximately one every kilometre.** The locations of these accesses are shown in Figure 4.2 – I have only illustrated Cottam 1 which is split into 3 sites - Cottam 1 South, Cottam 1 North and Cottam 1 West:

**“4.2- Cottam 1: A15 → A1500 Till Bridge Lane → Stow Road/Church Road → B1241→ Cot Garth Lane → Stone Pit Lane Access”.**

As mentioned above sections of the B1241 and narrow inter-twining single track lanes to access Cottam 1 link each of the 30 affected villages and are totally unsuitable for ALVs and HGVs, articulated or otherwise. Again there will be the same level of disruption for decommissioning as for construction.

## Appendix 7 - 7.10 Routes for Abnormal Load Movements: - Construction

The Applicant states: It is likely that all loads will be transported by river to the Immingham Docks. From here they will use the A160, A180 and M180 to reach the A15. National Highways (Yorkshire and North East Area) has confirmed that the A160, A180 and M180 from Immingham Docks to the A15 are acceptable for the proposed loads.

Please note: National Highways (Yorkshire and North East Area) may have confirmed that the A160, A180 and M180 from Immingham Docks 'to the A15' are acceptable for the proposed loads. **There is however, no mention or confirmation to the Applicant by National Highways in this or any other section that the single carriageway route of the very busy arterial A15 leading to the A1500 along which these ALVs, articulated and other HGVs propose to travel is suitable or acceptable for the proposed loads.**

There has been a number of HGVs that have become victim to some narrow areas and undulations of the A15 and coupled with soft grass verges where they have unintentionally left the carriageway and tipped over into the hedgerows with subsequent road closure or traffic control until the HGV could be recovered with the expensive and consequent delays to the road users. Such incidents are well documented in the local press and with the appropriate authorities. This is notwithstanding the closure or subsequent delays on the A15 caused by other types of traffic accidents as this single carriageway can raise 'driver impatience'. See 3.8 below.

**3.8 With regards to decisions, the emerging NPS EN-1 states that, "The Secretary of State should only consider preventing or refusing development on highways grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe".**

ALV's / articulated vehicles delivering transformers / cable drums / sub-stations / solar panels to the fragmented Cottam Solar 1, 2, 3a and 3b sites present such an impact on the A15, A1500 road network and will greatly heighten the risk of occurrence of such incidents.

**2.34 The Applicant states - The Site is located near to the strategic road network, connected by a number of local roads. This will help facilitate the movement of construction vehicles to and from the Site.**

I expect 'the Applicant' intends to use the same road network to facilitate the movement of decommissioning vehicles.

The argument presented by the Applicant that large agricultural machinery travels on the single track lanes surrounding the Cottam project makes them suitable for ALVs is a nonsense. **Agricultural machinery is designed to travel on all ground types** especially the land and fields. **This is not the case with ALVs, nor HGVs.** Images included with my earlier representations to the Planning Inspectorate have shown several HGVs over the past 12 / 18 months that have toppled into ditches on these narrow single lane routes, resulting in road closure and a crane required to recover the HGV. One of the intended transport routes is known as 'The Narrows' for a reason.

Disruption to all road users on these routes during construction only to be repeated during decommissioning (and during replacement of the 20 year life cycle of the solar panels plus other paraphernalia during its lifetime) **makes no sense for the miniscule amount of power such an industrial scale solar scheme can deliver, which on average is only 11% of its stated output in the UK, and makes Solar projects of this kind a highly inefficient use of the county/country's valuable farmland/agricultural land.**

The high number of ALVs delivering substation transformers to site/compounds and the removal of same during decommissioning will annihilate the area and the wildlife yet again, notwithstanding the transportation/removal of circa 7,000,000 solar panels for this/these solar projects, and the transport /cars used by the workforce.

The area will come to a standstill with this single project !

**2.22 - Cottam 1** – The Applicant states : There are no footways present on the A1500 Till Bridge Lane, Stow Lane, Ingham Road, Fillingham Lane, Willingham Road and South Lane within the vicinity of the Site. A footway is located on the east side of Thorpe Lane to the north of the A1500 junction.

2.34 - Cottam state the connection of a number of local roads will help facilitate the movement of construction vehicles to and from the Site. These roads are not suitable for such vehicles either now or during de-commissioning.

These roads are used by walking groups, cycling groups and individual cyclists, horse riding, dog walkers and parents walking, cycling with their children because they are quiet, safe and free from the category of traffic on the highways they will not have this facility.

## **OUTLINE OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN REVISION E AUGUST 2024**

### **Table 3.13 Waste – Page 22**

Cottam Solar state “Infrastructure such as PV panels and battery storage units that need to be replaced during the operational phase, will be removed and recycled *as far as practical* and in accordance with legislation and guidance applicable at the time, or if more suitable at the time, sold for refurbishment and reuse.

o ‘Worst case’ method of processing or disposal – e.g. landfill.”

***There should be no worst case scenarios of sending such materials to landfill when the Government and members of the public are upholding protecting all aspects of the environment in which we live.***

Such action would be disastrous wherein Cottam Solar’s high volume infrastructure materials are unable to be **fully** recycled and consequently **all waste that cannot be recycled in any shape or form will be sent to landfill is effectively risking above and below ground pollution and contamination to seep into the surrounding land and watercourses.**

‘The worst case scenarios’ from this / these industrial scale solar projects must be deemed an unacceptable and insupportable risk and the solar project company(ies) should not be permitted to fall back on the wording ‘*as far as practical*’ nor *legislation and guidance* if the legislation and guidance is totally inadequate now or at that time for replacement and decommissioning of Cottam and other industrial scale solar projects – a staggering thought, particularly as all the NSIP solar projects currently coming forward across the UK, should they be consented, will similarly fall due for decommissioning around the same time ! The disposal and replacement of appallingly high 4.5 meter tracking panels throughout the 60 year period is also of concern.

The risks of these proposals very much outweigh the hypothesised/speculated benefits put forward by the Applicant, Island Green Power.

There are a great number of ‘get out of jail’ cards being played by Island Green Power – too many ‘ifs’ and ‘may’ words in their documents and each of these ‘52 get out of jail’ cards is representative of the 52 reasons why this project should not be consented which include loss of tenant farmers and their livelihoods and homes, the detrimental effects on all aspects of the Lincolnshire economy, the impact on cultural heritage, the detrimental and life changing effect on the 30 affected communities, including their health and safety, the serious and distressing impact this will have on all the wildlife and bio-diversity, ecology, the extensive flooding that occurs on the Cottam 1 site in particular and so much more.

In 60 years there will be no-one who is alive today to witness if this project, if consented, will be successfully decommissioned and instead we are left with the horrifying legacy of the irrecoverable destruction of vast amounts of farmland by solar industrialisation. I object to the Cottam Solar application.

P A Mitchell

18 August 2024