

EN010139 – BYERS GILL SOLAR

**BYERS GILL SOLAR FARM- WRITTEN REPRESENTATION FOLLOWING RELEVANT
REPRESENTATION RECENTLY SUBMITTED**

INTERESTED PARTY REFERENCE NUMBER: 20048689

MR AND MRS WOOD

**CASTLE FORGE & LIVERY, COBBY CASTLE, COBBY CASTLE LANE, BISHOPTON,
STOCKTON-ON-TEES, CLEVELAND, TS21 1HD**

1.0 INTRODUCTION

- 1.1 On behalf of my client, Mr and Mrs Wood, I intend to raise through written representations and replies, and if appropriate oral representations at a Hearing and Compulsory Acquisition Hearing Concerns, issues relating to the proposed Byers Gill Solar Farm.
- 1.2 I submitted a Pre-Examination Representation, which can be found in this report in Appendix A.
- 1.3 RWE Renewables UK Solar and Storage Limited (the Applicant) responded to my Pre-Examination Representation on the 18th of July 2024. This email can be found in Appendix B.
- 1.4 Following on from this response, I further highlighted the issues relating to Castle Forge & Livery, Cobby Castle, Cobby Castle Lane, Bishopton, Stockton-on-Tees, Cleveland, TS21 1HD (Cobby Castle) by reply on 6th August 2024. I explained how the Applicants response did not set out any reasonable measure to mitigate the risks to Mr and Mrs Woods business and livelihood. I set out a proposal to aim to decrease these risks. A copy of this can be found in Appendix C. The Applicant is yet to respond to my proposal.
- 1.5 The serious concerns highlighted below, outline how Cobby Castle could suffer from lasting damaging business disruption and create a significant increase to the health and safety risks of Mr and Mrs Wood and their Son (who all work at Cobby Castle) and the horses that they care for.
- 1.6 This document will refer to mitigation measures that will be necessary to ensure that Mr and Mrs Wood can continue running their business during and after the potential construction of Byers Gill Solar Farm.

2.0 HEALTH AND SAFETY ISSUES

- 2.1 I do not believe the health and safety issues have been considered, nor do I believe that the applicant understands the nature of the horses that are kept and cared for at Cobby Castle. I have invited the applicant to come to the yard to help understand how the business works and the temperament and nature of the horses. However, I have not had a response regarding this.
- 2.2 Horses, however well trained, can be unpredictable and very easily spooked, they have evolved to have natural flight and defensive behaviours therefore, given their nature and size in an unfamiliar or inconsistent environment they can easily cause an accident. Mrs Wood has just recently had an injury due to a horse being spooked by a noise, which led it to rear up and cause her a foot injury.
- 2.3 It is incredibly important to my clients and their business that the environment the horses are kept in, is as calm and stable as possible. Horses are a prey species that associate noise with danger. As a result, unexpected loud noise can cause anxiety and can lead to a horse bolting or rearing. While the scheme is ongoing and being built, I believe that this could result in an injury to the horse and/or my client.
- 2.4 Without question, the environment will change while the work is ongoing, there will be a lot of noise and vibration. This is a serious concern to my client, and I do not believe that this has been accurately assessed.
- 2.5 I am currently seeking an equine specialist to undertake a health and safety review of the business; I believe that this will enable the Examining Officer to understand and respect the potential health and safety that may result from the scheme.
- 2.6 The applicant has put forward a Construction and Environmental Management Plan, however, there is no explanation, how this will specifically work with the Cobby Castle business, nor does it consider the stable and calm environment that horses need to be in.

- 2.7 Having worked on several schemes, I do not believe that the applicant will have the control over all contractors/drivers/workers at the scheme to ensure that a phone call is made before and after every vehicle movement. This is unrealistic and would also be disruptive to my client's day.
- 2.8 My client must walk the horses each day up and down the access track multiple times a day, to the arena and turn out paddocks. This is done to exercise and train the competition horses.
- 2.9 While the work is ongoing, this poses a health and safety risk to my client who needs to be able to control the horses and to the horses which are likely to attempt to jump fences or boundaries if spooked. Potentially leading to a serious accident to the horse, my clients or both.
- 2.10 Every year there are fatalities and injury caused by horses, the nature of the horses my client care for makes this much more likely. They need to be in a calm and controlled environment. The fact that potentially soon, all the land surrounding my client's property will a building site is very concerning and poses a serious health and safety risk to them and the horses.
- 2.11 The safety of the horses is paramount to my client's business, not only to ensure that they have repeat custom from their international cliental, but the animals are also exceedingly high value, ranging anywhere from £30,000 to £250,000. Therefore, when horses are left in their care, there is a large amount of trust placed with the client to ensure that the horses are kept safe and properly cared for.
- 2.12 I believe that my client will struggle to find appropriate insurance for the business without having to pay a substantial increase in their premium.
- 2.13 I expect if the scheme is to go ahead, that my client and their business will be indemnified against a loss or claim against them if an accident occurs as a direct result of the scheme. If the applicants believes that there is no health and safety issue here, I cannot see why this would be an issue.
- 2.14 Once the work is done and the solar panels are installed, there could be glint and glare from the panels, which again could disrupt the horses and potentially force them to bolt or become difficult to control and calm. As the solar panels surround the fully property/stables/access and areas and paddocks this will be very difficult to mitigate.
- 2.15 I expect that hedges will be built up around the area to mitigate this, however, the growth would need to start occurring now, otherwise the hedges will not be high enough to mitigate this risk.
- 2.16 3.6 There may also be increased veterinary bills if complications arise when the horses are stressed or taken out of their routine. Veterinary bills can be very expensive and will cause my client a lot of stress and additional cost as a direct impact of the scheme.
- 2.17 Mr and Mrs Wood are concerned about the community wood that is being introduced. It is just a strip of land which does not go anywhere or have a circular route. They feel that it could promote people loitering in the area, also it will create more volumes of people and dog walkers which again could lead to the horses being startled/spooked and creating a dangerous scenario for both the horses and my client.
- 2.18 There is already a footpath behind their property, it does not seem fair to introduce another, again increasing the amount of people near their home and business and creating health and safety issues towards the horses and my client but also causing potential security issues.
- 2.19 Security is very import to my client as they have to protect and care for high value animals, for international clients, they will not appreciate an increase of

residents/public walkers. Due to the nature of the business my client must abide by Fédération Équestre Internationale (FEI) rules, so they have to ensure that they have bio security in the yard. This is to ensure that they prevent the introduction or spread of disease. They have to ensure that they do not put the horses at risk with diseases such as:

- Strangles (highly contagious)
- EHV-1 this is a type of herpes & is extremely dangerous to youngstock

2.20 A concern with the scheme is that my client will be nervous to have the horses outside as much, if they do not feel that they can use their access track, the horses will not do well being inside all day, and there will be more people around the site and using the proposed footpath which could potentially contaminate the site advice

3.0 **POTENTIAL LOSS TO INCOME**

3.1 Due to the above reasons, my client is very concerned about their business being able to continue. They have clients who fly from around the world to use their livery and competition yard, and first impressions are especially important.

My client feels they are being surrounded with solar panels and the disruption that the work will cause, could cause clients to choose another livery and yard. As the value of the horses is so high, clients are very particular and simply want what is best for their horses.

3.2 My clients are very worried to explain to their current clients about the proposal because of the harm that this scheme will have on their business. They believe that their clients will go elsewhere, because of the increase in risk to the horse's health, safety, and wellbeing. These animals are incredibly valuable, and the owners expect the highest standard of care. As their environment will be damaged and disrupted as a direct consequence of the scheme, it is very likely that the business will be damaged.

3.3 This business has been built up by my client and they have plans in place now for their son to continue the business. This scheme and proposal are causing them a lot of worry and sleepless nights. The applicant's response to the health and safety implications is not good enough and does not mitigate this risk in any way.

4.0 **FLOODING**

My clients access track often floods as the land at either side is much higher which causes the water to come onto my client's access track. A photograph showing this is in Appendix 1.

4.1 It is concerning that if solar panels are installed, drains could be damaged which could further intensify this issue.

4.2 Any drains will have to be reinstated properly if damaged and overwatched by a competent individual to ensure that the development does not lead to further flooding in this area.

4.3 I have asked to see plans regarding the drainage from the Applicant, however, I have not seen any information regarding this. If the scheme were to go ahead, I expect that all drainage work is completed by an agricultural drainage specialist who understands agricultural drainage and what is required.

5.0 ACCESS TRACKS/ROADS TO THE HORSE ARENA AND PADDOCK

- 5.1 I expect that the access track will have hedges to block the solar panels from view and I would like to see your plans to begin this process.
- 5.2 There is no way of mitigating the noise to the access track as horses are moved from the current stables to the field with the arena, this is one of the main reasons that the business will struggle to operate during construction. As I explained, from my own experience, I cannot see a phone call being made every time a vehicle is going to use the track. This is also not going to mitigate the noise and traffic in the fields surrounding the track when the work is ongoing.

6.0 POTENTIAL MITIGATION MEASURES

- 6.1 I have stated that to mitigate the above factors, my client would expect the yard and stables to be relocated into where the arena and paddocks are, this would mean that the horses would be contained securely in one area and around the fields. This would mean that my client would no longer have to lead the horses up and down the track where it would be most likely for them to be spooked or startled. This would potentially reduce possible accidents and allow the business to run with minimal disruption.
- 6.2 The Applicant understood that this would be a useful mitigation tool to ensure that the health and safety impacts could be controlled at the site and the risk decreased. However, they believed that a temporary stabling would be sufficient.
- 6.3 However, temporary stabling would not work in this instance. The value of both the horses and equipment is significant, my client would not feel comfortable leaving the horses and equipment in a temporary unit, as they are not secure.
- 6.4 My client has also had some of the horses in temporary accommodation, when they have competed in the past. However, as the temporary construction can make a lot of noise and wind can blow through and disrupt the horses, it means that they are extremely uncomfortable and do not settle. Therefore, temporary stabling is not an option in this scenario, given the horses that are kept.
- 6.5 Permanent stabling would be required to ensure that the horses are in a settled environment. They would also need a midden, covered over, to be up to modern day standards, as currently they spread the muck directly onto the fields that the solar panels are going.
- 6.6 My client would no longer have to move the horses up and down the track, decreasing the likelihood of a risk of injury to my client or the horses. If this measure were taken it would mean that the business can continue with minimal disruption and my client will not have to worry about their business and livelihood as they are now.
- 6.7 Have received quotes for a replacement shed and stabling with a lean-to midden and it is expected that this will be [REDACTED] I have attached these quotes as Appendix D. This will ensure that the scheme should not affect the business in the same way that it will if they have to continually move horses up and down their privately owned access track.
- 6.8 Other mitigation measures as I have stated above include hedging to hide the panels along the track and to the residential property, and ensuring that the drain remain undamaged, or that the field is redrained if they are damaged.

7.0 **CONCLUSION**

- 7.1 The scheme will have a devastating impact on my client's business, as the health and safety risks will be too high, and accidents will occur.
- 7.2 If the scheme goes ahead, I expect the mitigation measures above to be met to allow the business to safely continue and Mr and Mrs Woods clients will be able to be comforted knowing their horses will be cared for in a stable and safe environment. This will decrease the impact that the scheme has on my client business, livelihood, and day to day life.

I will look forward to hearing from your response.



Helen Bell on behalf of GFW LLP.

APPENDIX A

PRE-EXAMINATION REPRESENTATION

Byer Gill Solar Farm- Pre-examination representations

Cobby Castle Forge & Livery, Cobby Castle, Cobby Castle Lane, Bishopton, Stockton-on-Tees, Cleveland, TS21 1HD

1. On behalf of my client, Mr and Mrs Wood, I intend to raise through written representations and replies, and if appropriate oral representations at a Hearing and Compulsory Acquisition Hearing Concerns relating to the following points:
 - The health and safety issues to my client and the animals
 - Potential loss of income from the business
 - Flooding issues
 - Access tracks/roads to the horse arena and paddock
 - Property devaluation
2. I will also discuss some potential mitigation issues and accommodation works which will be imperative if the scheme is accepted.

1. Introduction

- 1.1 My client operates a livery and competition yard from their property, they accommodate and train international client's horses, ready for show jumping and racing. They also live on site to ensure that they can care for the horse and their welfare and also ensure the site is secure.
- 1.2 The Byers Gill Solar Panel scheme plans to surround both their residential property and their business on all sides of the property. Figure one and two shows the extent of the scheme and impact to my clients land.



Figure One: Map of scheme showing the panels around Cobby Castle Forge and Livery



Figure Two: Map of scheme showing the panels around Cobby Castle forge horse arena and paddocks

1.3 My clients house and stables are located in the white triangle in figure one, their arena and paddocks are located to the North, with access to this area only being available up a single access track.

1.4 The proposed Solar Farm pose a risk to Mr and Mrs Woods health and safety, the health and safety of the horses and their owners. There is a serious concern that the due to these risks it will mean clients will find elsewhere and therefore would result in a caseation the business.

1.5 My clients feels as though the residents of the local village have been listened to and lots of changes since the original plans have been made to suit the villagers, however, they have a direct impact from the scheme, much more so than the villagers and they would like to see some mitigation works to decrease the impact to their home and business both during and after the works. They are surrounded by the scheme in every direction of the property.

2. Health and safety issues to my client and the animals

- 2.1 The type of horses housed and cared for by my client are highly strung competition horses, where slight changes to their environment or sudden noise can make them bolt or become very unruly.
- 2.2 My client has to walk the horses each day up and down the access track multiple times a day, to the arena and turn out paddocks. This is done to exercise and train the competition horses.
- 2.3 While the work is ongoing, this poses a health and safety risk to my client who needs to be able to control the horses and to the horses which are likely to attempt to jump fences or boundaries if spooked.
- 2.4 Every year there are fatalities and injury caused by horses, the nature of the horses my client has makes this much more likely. They need to be in a calm and controlled environment. The fact that potentially soon, all the land surrounding my client's property will a building site is very concerning and poses a serious health and safety risk to them and the horses.
- 2.5 The safety of the horses is paramount to my client's business, not only to ensure that they have repeat custom from their international clientele, but the animals are also very high value, ranging anywhere from £30,000 to £250,000. Therefore, when horses are left in their care, there is a large amount of trust placed with the client to ensure that the horses are kept safe and properly cared for.
- 2.6 The scheme could jeopardise this relationship and my client will find it difficult to fully guarantee their safety while the work is ongoing, and the solar panels are installed.
- 2.7 Once the work is done and the solar panels are installed, there could be glint and glare from the panels, which again could disrupt the horses and potentially force them to bolt or become difficult to control and calm. As the solar panels surround the fully property/stables/access and areas and paddocks this will be very difficult to mitigate.
- 2.8 Due to the nature of the business my client must abide by Fédération Équestre Internationale (FEI) rules, so they have to ensure that they have bio security in the yard. This is to ensure that they prevent the introduction or spread of disease. They have to ensure that they do not put the horses at risk with diseases such as:
- Strangles (highly contagious)
 - EHV-1 this is a type of herpes & is extremely dangerous to youngstock
- 2.9 A concern with the scheme is that my client will be nervous to have the horses outside as much, if they do not feel that they can use their access track, the horses will not do well being inside all day, and there will be more people around the site which could potentially contaminate the site.
- 2.10 My clients are concerned about the community wood that is being introduced. It is just a strip of land which doesn't go anywhere or have a circular route. They

feel that it could promote people loitering in the area, also it will create more volumes of people and dog walkers which again could lead to the horses being startled/spooked and creating a dangerous scenario for both the horses and my client.

2.11 There is already a footpath behind their property, it does not seem fair to introduce another, again increasing the amount of people near their home and business and creating health and safety issues towards the horses and my client but also causing potential security issues.

2.12 Security is very important to my client as they have to protect and care for high value animals, for international clients, they will not appreciate an increase of residents/public walkers.

3. Potential Loss of Income from Business

3.1 Due to the above reasons, my client is very concerned about their business. They have clients who fly from around the world to use their livery and competition yard, and first impressions are very important.

3.2 My client feels they are being surrounded with solar panels and the disruption that the work will cause, could cause clients to choose another livery and yard. As the value of the horses is so high, clients are very particular and simply want what is best for their horses.

3.3 Their son is currently competing internationally and owns his own valuable horses, while doing this he is gaining his own clients and introducing them to the livery yard, he is working now to create a successful business for himself when he returns home from showjumping, which means that it is incredibly important to the business and successfulness of it that any clients introduced at this stage are retained.

3.4 The amount of disruption and potential accidents that the scheme could cause, would lead to the business having a damaged reputation and clients going elsewhere.

4. Flooding

4.1 My clients access track often floods as the land at either side is much higher which causes the water to come onto my client's access track. Please see Photograph one which shows the impact of this flooding.

4.2 It is concerning that if solar panels are installed, drains could be damaged which could further intensify this issue.

4.3 Any drains will have to be reinstated properly if damaged and overseen by a competent individual to ensure that the development does not lead to further flooding in this area.



Photograph One- Flooding damage

5. Property Devaluation

- 5.1 The residential property and business will have significant devaluation, as the entire property is going to be surrounded by a solar farm.
- 5.2 It is very clear that this will reduce the value of it, and my client could find it difficult to find a buyer for the property because of the scheme. It is likely that they would have to significantly reduce the price if they ever chose to sell the property.
- 5.3 Access is going to be needed by the scheme on their only access into the Property. While the work is ongoing this will be incredibly disruptive, further adding to the health and safety issues above and we are unsure as to how this will work in practice.
- 5.4 My client is also concerned that the scheme will have an access right over the property, further inconveniencing them and also further devaluing the property. This has always been a private access to my client, and it will lose this as the scheme chooses to use this as an access point.

6. Potential Mitigation Measures

- 6.1 If the scheme goes ahead, there are several potential accommodations works that would be required to ensure that my client's business can still run smoothly, and they gain the least amount of disruption in their day to day lives.
- 6.2 The yard and stables could be relocated into where the arena and paddocks are, this would mean that the horses would be contained securely in one area and

around the fields. This would mean that my client would no longer have to lead the horses up and down the track where it would be most likely for them to be spooked or startled. This would potentially reduce possible accidents and allow the business to run with minimal disruption.

6.3 The areas around the solar panels will have to be screened with plenty of trees and hedges. The land is much higher at either point of their track and ideally the land would be dug out and levelled, to this level before the panels are put in place. If this is too expensive then there needs to be plenty of mature greenery planted early to hide the panels from eye level sight. To ensure this happens and given the height of the fields this needs to be a minimum of 5ft at the start of the works. My clients can't be wait 5 years for the panels to be hidden.

6.4 If the scheme needs to use my clients only access point, then it is crucial that this is gated at both sides and the gates remain locked unless traffic is coming through. The horse being contained is incredibly important. They already have two gates installed and this level of security must be maintained.

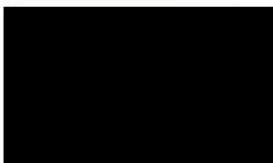
7. Conclusion

7.1 In conclusion, I expect you understand , that due to the nature of the business being operated from my clients property, that the scheme causes serious health and safety risks, security risks, and potential damage to the property from flooding.

7.2 The scheme could jeopardise the future of the business if clients no longer chose to use their business due to the disruption caused.

7.3 Although the client would prefer the scheme to not go ahead, if the scheme could incorporate all of the above mitigation measures, it will decrease the impact that the scheme has on my client business, livelihood and day to day life.

I will look forward to hearing your response in regard to the pre-examination representations.



Helen Bell MRICS on behalf of GFW LLP.

APPENDIX B

APPLICANT RESPONSE TO PRE-EXAMINATION REPRESENTATION

Hello Helen,

Thank you for providing your response on behalf of your client (Mr and Mrs Wood) to the submitted Development Consent Order (DCO) application of Byers Gill Solar Farm. I write to you on behalf of RWE Renewables UK Solar and Storage Limited (the Applicant) to provide a response to the following points which have been raised:

- The health and safety issues to my client and the animals
- Potential loss of income from the business
- Flooding issues
- Access tracks/roads to the horse arena and paddock
- Property devaluation

The Health and Safety Issues Regarding your Client and Animals

The health and safety of the local community has been considered carefully within the application documents and will help ensure that no adverse effects are created as a result of the construction and operational phases of the Byers Gill Solar Farm. As part of the application documents, an outline Construction and Environmental Management Plan (CEMP) (Document Reference: 6.4.2.6) sets out mitigation measures that will be deployed to reduce the likelihood of adverse effects on the any potentially sensitive receptors in close proximity to the site, including your client and their business.

The CEMP will ensure that noise and vibrational levels of the construction activities are controlled to 'Best Practicable Means' and will be in accordance with relevant guidance, amongst various other mitigation measures. The additional traffic created as a result of the construction period will further be controlled by an Outline Construction Traffic Management Plan (CTMP) (Document Reference: 6.4.2.8) which sets out proposed methods of managing traffic and staff vehicles. Examples of measures that will be implanted to reduce the potential impacts on sensitive receptors will include timing HGV deliveries to prevent multiple deliveries at the same time to the site as well as banksmen at the site entrances to facilitate HGV movements into and out of the site. Through these example measures we will ensure that the impacts felt on your client including horses will be reduced as far as practically possible. We would be happy to consider any further measures for managing traffic during construction in the area of Cobby Castle.

During the operational period, the potential effects of glint and glare have been undertaken and documented within a standalone report (Document Reference: 6.4.2.2). The assessment carried identifies whether the panels themselves will create any adverse impacts associated with reflections, glint, and glare. With respect to potential impacts on residential properties on Cobby Castle Lane, no impacts have been identified, this due to solar reflections not being geometrically possible and the

current vegetation / screening. Furthermore, during the operational period, the panels do not make any noise or create movements that will produce further impacts on either your client or their horses. This is supported by the 'Advice on Solar Farms' document produced by the British Horse Society.

Potential Loss of Income from the Business

As mentioned above in the response to the potential health and safety measures, various measures have been included within the application to reduce potential construction impacts to a reasonable level that will not cause significant impacts on your client and therefore we do not consider they will create significant impacts on Cobby Castle Forge and Livery.

Flooding Issues

Prior to the construction of any associated works on the site, ground penetrating surveys will be undertaken to understand to a greater extent the drains that serve the site, including the areas in close proximity to your client and the horse arena. As part of the extensive assessment of development, an Environment Impact Assessment (EIA) has been carried out which has assessed the likely effects of the development on hydrology and watercourses in the construction, operational and decommissioning phases (Document Reference: 6.2.10).

The assessment has concluded that as a result of the development, no significant effects are anticipated from surface water runoff from PV panels during the construction phase. As such, our assessments show that the construction are not expected create any significant impacts on the access track that is used by your client. However, in the event that damage is caused to drains that may result in increased flooding, the Applicant is committed to restoring the drains. If desired, we could enter into a side agreement assuring remediation for any damage.

Property Devaluation

With respect to potential property depreciation, we are not aware of any evidence that solar farms have any impacts on property valuations, based on RWE's project portfolio and industry knowledge. Impacts on property prices are not a material planning consideration.

Potential Mitigation Measures

We would support the mitigation measure of relocating the yard and stables on a temporary basis during the period of construction in the vicinity of the property.

To the north of the property, the panels are a minimum of 25m with hedgerow planting proposed on the boundary of the field. To the east of the property panel areas are a minimum of 25m from the property with hedgerow planting proposed to screen the panels. We would be willing to commit to semi-mature planting in the areas that would benefit the property so that the effects from mitigation are experienced earlier. It is not feasible to change the ground levels of the solar farm.

Lockable gates are proposed either side of Cobby Castle Lane for the construction and operation of the project. We will communicate with your client throughout the construction of the project to ensure they are aware of vehicle movements and timing.

As detailed in the response above, we are confident that the construction and operation of the development will not create any significant impacts on your client's health and business and we are committed to work alongside you to ensure this during the construction phase, should the development receive consent.

The Applicant would like to offer a discretionary settlement of £20,000 to your client in respect of:

- Any disturbance during construction including support for temporary relocation of the stables and yard
- Crossing of Cobby Castle Lane with construction traffic and any cables

Please let me know what you consider of this discretionary payment, which is offered as a show of good will. We would expect any agreement would result in the withdrawal of objection from the Planning Inspectorate.

Thanks,

Michael Baker
Development Project Manager
RWE Renewables Europe & Australia GmbH
Development UK & IRE, Solar & Storage UK

Address: 14 Bird Street, London, W1U 1BU

Mobile: [REDACTED]

Email: [REDACTED]@rwe.com

Website: [REDACTED]

APPENDIX C

GFW RESPONSE AND PROPOSAL TO THE APPLICANT

Dear Micheal,

Thank you for your email on the 18th of July. I have now reviewed your comments with my client, and I will set out our points and proposal below regarding:

- Health and Safety issues to my client and the animals
- Potential loss of income from the business
- Flooding Issues
- Access tracks/roads to the horse arena and paddock
- Property Devaluation

I will then respond to your proposal, and potential mitigation measures.

Health and Safety issues to my client and the animals

I do not believe that you have fully considered the health and safety issues for my client, considering the nature of the business, and the types of animals that they care for.

Horses, however well trained, can be unpredictable and very easily spooked, they have evolved to have natural flight and defensive behaviours therefore given their nature and size in an unfamiliar or inconsistent environment they can easily cause an accident. My client has just recently had an injury due to a horse being spooked by a noise, which led it to rear up and cause her a foot injury.

It is incredibly important to my clients and their business that the environment the horses are kept in, is as calm and stable as possible. Horses are a prey species that associate noise with danger. As a result, unexpected loud noise can cause anxiety and can lead to a horse bolting or rearing. This could result in an injury to the horse or my client.

Without question, the environment will change while the work is ongoing, there will be a lot of noise and vibration. This is a serious concern to my client, and I do not believe that this has been accurately assessed. I invite you to come to the site, to understand the business and see the horses in their current environment. I believe that this will help you realise the issues that the solar farm work will cause.

In terms of the proposed method of managing traffic you have mentioned, I do not believe that any of these measures would happen, as they are simply not practical. I have worked on several projects, and I do not believe that any of those methods would genuinely happen on the ground when the project is ongoing. Especially, when a lot of these mitigation measures rely on the contactors being vigilant and making phone calls.

I do believe that Glint and Glare will be a problem here, and I am aware of other solar farm projects where Glint and Glare from solar is affecting drivers pulling out from roads. Although I do take into

account that the hedges could grow, and I expect that this would need to begin as soon as possible to ensure that the hedges will block the panels up and down my client's access track.

I expect if the scheme is to go ahead, that my client and their business will be indemnified against a loss or claim against them if an accident occurs as a direct result of the scheme. If you believe that there is no health and safety issue here, I cannot see why this would be an issue.

Due to the risk increases here, my client would have to explain the situation to their insurer, and it is very likely that the insurance premium will increase. Any increase to the insurance premium as a direct consequence of the scheme would be added to a claim.

There may also be increased veterinary bills if complications arise the horses are stressed or taken out of their routine. Veterinary bills can be very expensive, and any additional costs would be added to a claim, as my clients should not suffer a loss.

Potential loss of income from the business

My clients are very worried to even tell their current clients about the proposal because of the harm that this scheme will have on their business. They believe that their clients will go elsewhere, because of the increase in risk to the horse's health, safety, and wellbeing. These animals are incredibly valuable, and the owners expect the highest standard of care. As their environment will be damaged and disrupted as a direct consequence of the scheme, it is very likely that the business will be damaged. This business has been significantly built up by my client and they have plans in place now for their son to continue the business. This scheme and proposal are causing them a lot of worry and sleepless nights. Your response to the health and safety implications is not good enough and does not mitigate this risk in any way.

I feel that you must visit the yard and understand the nature of this business and the horses that they keep.

If you have done health and safety mitigation, I presume that you must have done a risk assessment, please can I have a copy of this? Does this

If we do an objection, I will be getting an equine specialist to carry out a risk assessment as they will understand the nature of keeping showjumping horses and the risks that will increase as a direct consequence of the scheme.

Flooding Issues

In terms of the flooding, I expect that I will see the surveys taken out as part of your investigations. I hope that all drainage work is completed by an agricultural drainage specialist who understands agricultural drainage and what is required.

Access tracks/roads to the horse arena and paddock

I expect that the access track will have hedges to block the solar panels from view and I would like to see your plans to begin this process.

There is no way of mitigating the noise to the access track as horses are moved from the current stables to the field with the arena, this is one of the main reasons that the business will struggle to operate during construction. As I explained, from my own experience, I cannot see a phone call being

made every time a vehicle is going to use the track. This is also not going to mitigate the noise and traffic in the fields surrounding the track when the work is ongoing.

Property Devaluation

I cannot understand how you believe that a property being surrounded by solar panels would not cause property devaluation. I am aware of sales where potential buyers have pulled out due to the prospect of a solar farm, and subsequently affecting value and saleability.

I would also like to highlight that I am aware that property prices are not a material planning consideration, however, it would be added to a claim, as my client would suffer a loss as a direct result of the scheme if their property is devalued.

RWE proposal and mitigation measure

I understand that you realise that relocating the yard and stables would mitigate a lot of the above problems for my client, and they also believe this. However, temporary stabling would not work in this instance. The value of both the horses and equipment is significant, my client would not feel comfortable leaving the horses and equipment in a temporary unit, as they are not secure.

My client has also had some of the horses in temporary accommodation, when they have competed in the past. However, as the temporary construction can make a lot of noise and wind can blow through and disrupt the horses, it means that they are extremely uncomfortable and do not settle. Therefore, temporary stabling is not an option in this scenario, given the horses that are kept.

I know from experience that communication can be an issue during schemes, and I do not believe that it would be possible to inform my client of every single vehicle movement. Therefore, the stabling must move to the field that the arena is in.

My client would need a shed and stabling in the field that they lead horses to. They have looked into the cost of a shed and stabling and this would be circa £110,000. They would also need a midden, covered over, to be up to modern day standards, as currently they spread the muck directly onto the fields that the solar panels are going. I would like to mention here that, even though temporary stabling is not an option, given the length of the scheme, temporary stabling would be incredibly expensive.

Having spoken to my client, they would accept a total sum of £150,000. At this level they would be able to install a shed and stabling to move the horses to the field to ensure they are not exposed to disruption from the scheme in their current stabling, and my client would no longer have to move the horses up and down the track, decreasing the likelihood of a risk of injury to my client or the horses. They would also build a lean-to midden from the shed, covered, and concerted. They will also withdraw any objection and accept any further losses from the scheme, including any devaluation to their property.

If this cannot be done, we will raise an objection to the scheme. My client has a well- established business, which they have worked very hard for and intend to continue to do, and the scheme could have a lasting damaging affect to this business and their livelihood.

If you are not able to allow them to mitigate against this, then we are left with no other option but to object to the scheme.

I strongly recommend that you meet my client, at Cobby Castle and review the serious impact that the scheme will have on their health and safety, the horse's health, and safety and also the damaging affect that the scheme will have on their business.

I ask, if you would leave a £250,000 asset where it has a significant risk of being damaged or terminated?

I understand that the set date for written representations is the 29th of August 2024, so I hope to hear from you as soon as possible about the proposed £150,000 to allow my clients to protect their business and mitigate the impact of the scheme on their business.

I will look forward to hearing from you.

Kind regards

Helen

APPENDIX D
QUOTES FOR SHED AND STABLING



Graham Heath Construction Ltd
The Creamery
Wrenbury Industrial Estate
Station Road
Wrenbury
CW5 8EX

Cobby Castle
TS21 1HD

Our Ref: 24-26388-02-BH

04 July 2024

Dear Victoria Wood

Re: UKCA marked agricultural building to BS5502 Class II
We have pleasure in providing an estimate for your Free Standing Portal Frame building.

Building Specification

Length: 34.138m (112' 0")
Width: 10.973m (36' 0")
Eaves Height: 5.487m (18' 0")
Roof Pitch: 15°

Bay Size: All bays are the same size at 4.268m, end bays reduced to achieve overall length.

Steelwork (including web stiffeners and rafter stays)

To supply for erection on prepared site and concrete foundations, steel frame 4.268m (14') centres with UB 305 x 165 x 40 stanchions and UB 254 x 146 x 31 rafters. Roof bracing to one end. Side bracing and CHS eaves ties. To be 4 gable posts (UB 203 x 133 x 25).

Holding down bolts, templates, cones and washers included.
All steelwork to be Painted , other colours available.

Purlins

To supply 7in x 3in (15ft) - Timber C24 purlins bolted to frame at 1.375m. Eaves beams (9in x 3in (15ft) - Timber C24).

Roof Cladding

To supply Natural Grey Fibre Cement laid in accordance with manufacturer's instructions. Ridge to be Alternating Ridge.

Roof Lights

Incorporate 16 roof lights of size 3.048m, in roof cladding positioned to suit customer's requirements.

Rainwater Goods

Building Side 1: PVC with 2 x 110 Diameter down-pipes and rubber sealed joints.

Building Side 2: PVC with 2 x 110 Diameter down-pipes and rubber sealed joints.



Cladding

Gable End 1: To be clad down 3.636m below eaves with Castle Boarding - CAB on Timber - 5 x 3 C24 rails.

Gable End 2: To be clad down 3.636m below eaves with Castle Boarding - CAB on Timber - 5 x 3 C24 rails.

Side 1: To be clad down 3.636m below eaves with Castle Boarding - CAB on Timber - 5 x 3 C24 rails.

Side 2: To be clad down 3.636m below eaves with Castle Boarding - CAB on Timber - 5 x 3 C24 rails.

Concrete Panels

Gable End 1: 90mm x 1000mm thick concrete panels, to a height of 2m.

Gable End 2: 90mm x 1000mm thick concrete panels, to a height of 2m.

Side 1: 90mm x 1000mm thick concrete panels, to a height of 2m.

Side 2: 90mm x 1000mm thick concrete panels, to a height of 2m.

Doors

Door 1 is a 3.658m wide and 3.658m high Sliding Door located Gable End 1 - Centre.

Project Costs

Supply: £46,787.89

Delivery: £1,260.00

Doors: £1,364.87

Erection: £9,168.80

Foundations: £4,100.00

Total Project Price: £62,681.56

All prices exclusive of VAT.

Please refer to our website for full terms and conditions.

All quotes will be valid for 14 days.

Due to UKCA Marking of all fabricated structural steelwork all prices are subject to a structural calculation and therefore, may result in a change to your quotation.

We trust our quote meets with your approval. If you would like to discuss your quote, please contact Bobbie Heath your Sales Executive on 01270 781158 or email on bobbie@gh-construction.co.uk.

We look forward to hearing from you shortly.

Yours sincerely

Bobbie Heath
Sales Executive

bobbie@gh-construction.co.uk



QUOTATION FOR SUPPLY ONLY



Customer & Invoice Address	Quote Information
v [REDACTED] Cobby Castle Forge & Livery Cobby Castle Lane Bishopton Stockton [REDACTED] UNITED KINGDOM	Q-211498-1 OW-403735 Pounds Sterling 7 Days 12/07/2024
IAE Contact Details	IAE External Contact Details
[REDACTED] [REDACTED]@iae.co.uk	Olivia Wilkes [REDACTED]@iae.co.uk

Bottom Swing Door			
Product	Description	QTY	Total
F093 2000 00	16' Bottom Swing Door		

Anti-Weave Sliding Door			
Product	Description	QTY	Total
F093 2000 00	16' Anti-Weave Sliding Door		

Fully Boarded Partition			
Product	Description	QTY	Total
XXF093 2002 52	12FT STABLE FULL BOARD PARTITION BROWN		
XXF093 2002 81	STABLE END OF RUN POST		

Grille Top Partition			
Product	Description	QTY	Total
XXF093 2002 42	12FT STABLE GRILLE TOP PARTITION BROWN		



Proprietors: F. Klucznik & Son Ltd (Vat Number: 319060967) (Reg. No. 1448116)
 Head Office: Mossfield Road, Adderley Green, Longton, ST3 5BW
 ☎ +44(0)1782 339320 📠 +44(0)1782 339321
 🌐 www.iae.co.uk Email: sales@iae.co.uk



Product	Description	QTY	Total
XXF093 2002 81	STABLE END OF RUN POST		

EX VAT

COMMENTS/TERMS IN ADDITION TO STANDARD TERMS AND CONDITIONS

Galvanized to BS EN ISO 1461
All details and prices are subject to IAE's conditions of sale. (Copies available on request)
This is not a VAT invoice.

Equestrian Stabling

As standard, stabling will be supplied to suit a level concrete floor. If it is required however, the Moorland stabling range can accommodate a fall of up to 50mm from post centre to post centre across a stable front and also from front to back (or back to front) over a stable partition. (Extra fittings will be required to accommodate this at an additional cost) This is the maximum fall that the Moorland stable range will accommodate.

All Stables are supplied flat packed in kit form to be assembled on site.

Please note: Boards will be fitted to doors, boards for panels will be supplied loose.