

SUTTON ST EDMUND PARISH COUNCIL

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Miss D Leedham. Parish Clerk

Dear Sir/Madam

RE: Planning Application: H19-0329-24

Sutton St Edmund Parish wish to object to Planning Application H19-0329-24 for the following reasons:

Transport/Vehicular movements - Construction period

The new proposed traffic route facilitating the use of South Eau Bank on to Broadgate through Sutton St Edmund village and turning down Cross Road within the village to access/egress site is completely inappropriate:

- Taking HGV's down populated areas and through a populated village seems illogical.
 - Cross Road is not wide enough to accommodate HGV's given use by local residents to on-street park vehicles safely outside their properties.
 - Cross Road also is the only access/egress to the village playfield with a playground/equipment located on it. This is regularly used by children/families plus Parish events being and the introduction of heavy traffic extending to the weekends creates a significant/potential accident risk not previously encountered.
 - Cross Road is not a road which receives gritting regimes from LCC so HGV's will more than likely slide off the road given the nature of their load and tight navigation required to travel down this road which may result in ongoing damage to vehicles and/or properties in close proximity to the highway. This road does not seem appropriate/safe to be considered for this nature.
 - The 49 week construction period will involve construction traffic interacting with school/commuting times which poses a risk to the Health & Safety (H&S) of Parishioners and visitors. This is especially concerning during the Autumn and Winter periods

where daylight hours will be significantly shorter than the proposed delivery/vehicle movement times.

- The Parish will be exposed to an increased risk factor of accident and/or road injury as vehicular movements of a large nature will increase and there is little mitigating/H&S management actions being provided by the applicant leading to an uncontrolled H&S event being more probable under Heinrich's Triangle Theory.
- In all areas of the road and footpath network in the Parish, and in particular travelling through Throckenholt and Sutton St Edmund there is very low/poor levels of street lighting. During inclement weather and autumn/winter periods with this increased traffic movement it will pose a risk to drivers, but more importantly Parishioners using the footpaths or cycling as HGV's have a heavy mass which cannot stop in the same braking time/distance as smaller vehicles more familiar with this road system.
- The route/traffic strategy does not appear to satisfactorily consider impact/vibration damage for a theoretical 49 week period to structures located in close vicinity to the highway through the prolonged use of the road by construction/heavy HGV's.
 - This is particularly important travelling through Throckenholt and also in Sutton St Edmund as there are many properties including the historic Church and its dry stone wall which border the highway.
 - Another consideration particularly in the Church area of Sutton St Edmund are the historic Horse Chestnut Trees which have Preservation Orders on them and are already identified as being in a fragile state recorded with colleagues in the Tree Preservation department of SHDC.
 - Will their root base system be compromised via vibration leading to a risk of falling which would have material consequences to the overhead mains electrical power line serving many properties in the Parish and could result in a fatality on the highway or footpath. There is also the increased risk to damage to surrounding properties should one of the trees fall..

Road Conditions

- Guanockgate, Cross Road, South Eau Bank and Old Fen Dyke are prime examples of where road surface repairs are inadequate, and funding does not permit resurfacings.

Soil Grading

- The application is based on a soil test taken in June 2022, at this point in the crop growth cycle the soil is naturally depleted.
- Soil sampling can be affected by a number of factors including temperature, moisture, application, sampling depth. Nutrient levels in the field can vary due to a number of factors including local variation (distance as short as 1m), area variation, temporal variation. Given 2022 was a year of exceptional drought and samples were taken in June, the samples may not be representative of the correct grading.

Glare

- The applicants supporting photovoltaic and glare survey whilst generally assuming ground level results does not consider adequately the effect of glare on houses which are located on the East of Broadgate facing the development whose bedrooms and living areas could face this way and equally have first floor rooms not considered in the survey. Whilst the survey advocates distance from the site being far enough, there are inconsistencies on the glare assessment impact and then individual assessments of receptors at various properties which are modelled theoretically only. The data suggests properties which could be exposed to more than 1 hour per day for more than 3 months thereby falling into a medium/high impact rating requiring detailed individual assessment which has not been undertaken.
- The survey also fails to highlight on a geogoogle map the receptor locations 26 - 34 which the report recognises have no physical/vegetation screening so further detailed assessment should have been undertaken to ensure these properties are safely screened to prevent excessive glare.
- Glare is not taken into consideration for members of the public and animals using the public footpath and bridleways through the site who will be exposed to the large panels in many areas directly.

Public Footpaths/Bridleways

- The submitted application appears to fall short of providing detailed information on a H&S/CDM front as to how the construction period/operation will integrate itself whilst members of the public still have a full right to access the pathways running through the area under the COuntryside Act 1968. There appears to be a lack of consideration and first priority given to people/animals and the documentation reads as though the construction operations takes priority. Given the historic nature of the footpath system and its

enjoyment/continual use within the Parish and surrounding vicinity by people travelling to use these footpaths, further work should be undertaken to ensure peoples enjoyment of this area is the main priority reinforcing people's ability to exercise and enjoy the countryside.

- Will all security/CCTV cameras be pointed away from the footpaths/bridleways as people are entitled under GDPR/Data Protection regulations to use public rights of way without being recorded.
- Many herds of deer (including those of a protected species) reside in the area and are likely to get channelled down these public footpath/bridleway corridors, putting pedestrians and their animals at risk of confrontation, with no means of escape.
- The application does not address the desirability of providing "healthy inclusive and safe places" or "enabl[ing] and support[ing] healthy lifestyles". The application is restrictive, excluding local people from accessing farm tracks, which, although not legally notified rights-of-way, are used regularly.

Fire hazard

- Given response times for emergency services locally, flammable batteries on an unmanned site cause unnecessary risk to the surrounding residents and area.

Local employment

- The application will have a negative impact on local employment. This applies especially to those working in Agriculture.

Visual impact

- The Lincolnshire Fenland is known for its open landscapes, with the introduction of high fencing, metal structures, battery holding areas, cameras, hedging and trees the view will materially change.
- The application contradicts the Secretary of State's decision on the impact on the Fens - APP/D0515/A/12/2181777 APP/A2525/A/12/2184954.

Classification

- The site is classified as producing slightly less than the 50 MW (49.9), which puts the application just below the National Significance Importance Project (NSIP). However, due to the vast area it is to be sighted on, the proposal has the potential to produce in excess of 50MW and should be subject to NSIP.
- Given the cumulative impact of a neighbouring proposed solar farm, NSIP should be activated.

Public Transport

- The application makes the suggestion that staff for the solar farm could use public transport to commute to the site. Public transport is limited in the Parish, with a bus in the morning and one after midday.

Misleading information

- The application is branded under Tydd Solar, but located closer to Sutton St Edmund.
- The title of the application refers to "temporary"; despite lasting in excess of 40 years when construction and dismantling are taken into consideration.
- After 40 years of construction this will be deemed as industrial, and will require excessive decommissioning or rebuilding, what considerations have been taken towards this?

Kind regards

Dominique Leedham

Clerk to Sutton St Edmund Parish Council