

# Scopwick and Kirkby Green Parish Council

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The minutes of the Parish Meeting held on **Wednesday 12<sup>th</sup> April** 2023. The meeting was held in Scopwick Village Hall. These are notes of the meeting until approved by the Council as a true record.

## Parish Meeting – Springwell Solar Farm

Chairman: Cllr John Money

Speakers: Jill Moran, Mark Williams

Others present: 75 attendees – residents of Scopwick and Kirkby Green and representatives of Parish, District and County Council

Minutes compiled by Jules Wilkins

### 1. Chairmans welcome and opening remarks

Mr Marc Williams proposed that John Money chairs the meeting as he has relevant experience. Mrs Jill Moran seconded the proposal. A question was raised regarding Mr Money's current position as Parish Councillor. It was clarified that this meeting is a parish meeting and not governed by the Council.

Marc Williams explained the purpose of the meeting was to agree the community response to the Springwell Solar Farm Scoping Report. He emphasised the urgency of the requirement for feedback and timescales concerned.

Cllr Money took the Chair and declared that he is currently a Parish Councillor and will be retiring in May. He is also standing for the District Council in the upcoming election. He further disclosed his previous involvement with Blankney Estates and his personal position against the development of the proposal by Springwell Solar.

Cllr Money explained that the meeting was called by 8 parishioners as required for a Parish meeting to take place to agree the comments on the Scoping Report to be forwarded to the Parish, District and County Councils. He explained the agenda for the meeting, including the importance of relating all comments to relevant sections of the Scoping Report. The outcome of the meeting will be communicated to Council and District Councils and our MP.

### 2. Process overview and comments received by contributors.

Jill Moran provided a recap of the background to the Springwell Solar Farm Scoping Report as follows:

EDF Renewables in partnership with Luminous Energy are working on the Springwell Solar Farm. Together they form the Applicant, Springwell Energyfarm Limited.

The Applicant has secured an 800 Mega Watt connection agreement with National Grid. The size of the project means that an application must be made to the national planning body (the Planning Inspectorate) rather than our local District or County Councils. Ultimately the

decision on the application is made at Government level by the then Secretary of State acting on a recommendation by the Planning Inspectorate. This process takes years rather than months and we are still in the early stages, what the Planning Inspectorate terms the 'pre-application' stage. Full details of the process and copies of all documents in the case can be viewed on the PI website - just google PI Springwell.

The only document to have been submitted by the Applicants so far is the Springwell Solar Farm Scoping Report which forms the basis of a scoping request to the Planning Inspectorate for its opinion (an Environmental Impact Assessment Scoping Opinion) setting out the information to be provided in an Environmental Statement (ES) relating to the proposed development. Before publishing a Scoping Opinion, the Inspectorate has a duty to consult the relevant consultation bodies, which are prescribed by legislation. Scopwick and Kirkby Green Parish Council and North Kesteven District Council are consultation bodies for the purposes of EIA scoping. They have been asked to inform the Planning Inspectorate of information they consider should be provided in the Environmental Statement. The deadline for doing so is 20<sup>th</sup> April 2023.

The purpose of this meeting is to assist our Parish and District Councils with that response and ultimately to ensure that as much is 'scoped in' the instructions to the Applicants as possible so that the resulting Environmental Statement covers all the issues which the residents and our representatives at the Parish and District Councils consider relevant to this site and proposal. It is the Applicants responsibility to provide the Environmental Survey in line with the Scoping opinion and it is standard practice for them to employ their own consultants to draft these documents.

As the Parish and District Councils only have until the 20<sup>th</sup> April to send their response to the PI, this meeting is to gather views and distribute them to our local authorities.

As part of the no2springwellsolar group, Jill has been gathering comments via the email list and summarised these at the meeting to encourage further comment and support at the meeting. The summarised comments re provided at Appendix A and include reference to:

- The Rochdale Envelope
- Landscaping, Habitat Management and Biodiversity Enhancement
- Lighting
- Use of Borrow Pits
- Soils Management (relating to restoration of the land after the end of solar equipment life)

Jill also provided some issues for consideration in an Environmental Statement specific to this site relating to Flood risk and management, Pollution, Protected species, and Health. Further details on these can also be found in in Appendix A.

### **3. Project concerns**

Marc Williams submitted further comments relating to the Scoping Report, details of which can be found at Appendix B. Comment headings and their relevant sections are provided below:

- Approach to the EIA is biased (section 1.1.1)
- 'Scoping out' certain aspects important to the community (s1.5.3)
- Rochdale Envelope - use designed to enable material change to critical elements after potential consent granted (s2.2)

- Public Rights of Way - will be fundamentally changed (s2.2.12)
- Cultural Heritage - sites in the area affected will have outlooks spoilt by the development (s2.3.24)
- Site decommissioning - lack of assurance (s2.4)
- Drainage - research reference used regarding runoff and flooding not relevant (s2.4.62)
- Borrow Pits - concern regarding construction contamination (s2.5.9)
- Alternatives – no evidence of consideration of alternative sites or sources of power generation (s.3.1.1)
- Opportunity to enhance the environment – no commitment (s4.10)
- Utilities – question how this can be out of scope (s5.5)
- Inaccuracies and potential use of incorrect document references (s5.8)
- Socio-Economic impact – applicant indicates there will be a positive impact (s5.8.19)

#### 4. Questions on comments received.

The following questions were received by the chairman in the meeting:

What is the Parish Council going to do with the results of tonight's meeting?

The chairman responded that they would make an official response to the Planning Inspectorate.

The scoping report does not define which footpaths are going to be affected. Not just official ones but also the permissive ones which create a more enjoyable walking experience. There needs to be more clarity on this.

John Woodward stated he has sought advice from the Planning Inspectorate regarding 'quality of life' issues being ignored and the scoping out of certain points in the Scoping Report. The Planning Inspectorate stated there were 9 points that have to be proven to scope something out and Mr Woodward will provide this to Jill to identify where Springwell Solar have not complied. Mr Woodward also submitted further comments in writing, and these are attached at Appendix C.

Referring to a statement by the Parish Clerk at the last Parish meeting that he communicated with Springwell and would chase up a response. Has any correspondence come back?

The chairman responded that he was not aware of any response.

if we are not confident that the Parish Council will properly represent our views who will address this?

The chairman responded that it is the Parish Council's responsibility to represent the community and the community cannot communicate directly with the Planning Inspectorate, only with the statutory consultants. Marc Williams responded that there is a Parish Council meeting on 18<sup>th</sup> April when they will discuss this (Cllr Money confirmed this) and the public are welcome to attend.

Will we send 3 copies then, to District Council, Parish Council and County Council? The chairman responded that the Parish Council should take on board what the parish meeting says in its response to the Planning Inspectorate. Copies of the minutes will also be sent to the District Council and County Council.

It was stated that the key point is the law and the inspectorate. The chairman suggested that communication should be with the Chief Executive of each body and not the planning dept.

The wildlife study appears inaccurate, states they have only seen one Kite for example. Can we do anything about this?

The chairman responded that probably the best time to address this is once the application has been lodged with the Planning Inspectorate as it will need to be more specific. Jill Moran stated she had contacted Lincs Wildlife Trust who advised her to use the iRecord app to report wildlife as these reports will go forward to the Planning Inspectorate. Jill urged attendees to use the app to build a more accurate wildlife understanding.

#### **5. Receive further comments.**

The following comments were made at the meeting:

There was an Environment and Scrutiny Committee meeting at the County Council where it was apparent that at least 5 NSIPs are going through at the moment and there is a real risk that the grid cannot take it (which will mean not just solar panels but ore pylons and overhead cables).

Regarding section 3.1.3 (Alternatives), I would like to propose that not just alternative sites but also alternative energy sources eg offshore wind farms are included.

The chairman responded that this should be included in our response, but it is highly likely that the Planning Inspectorate will say they are only considering that specific application.

4.1 – closures to public rights of way. Reference to 'relevant stakeholders' – need to put forward what we consider specific stakeholders to be.

Agree with chairman's point about smaller solar sites being preferable and these have been supported. Was told by Springwell that they hadn't considered any other sites, but they do have to as part of planning application. Springwell will know all the points we will raise about environment etc and will have response. We need to be looking at what is unique to our area to argue our point as the general arguments have been overcome in previous applications elsewhere. The chairman responded that these points will be better included when the application is made to Planning Inspectorate.

Another attendee voiced his concern about waiting until application stage. The chairman clarified the difference between the Scoping Report stage and full application.

An attendee asked when do we get to the stage where we need funding for proper legal advice? The chairman responded that we are getting to that stage now and have been discussing funding options e.g., JustGiving site. Other options were suggested including pro bono work and Universities. Nottingham University did a survey that included the Beck and surrounding area, perhaps we could get hold of their research?

An attendee stated he has done research on lithium battery storage which will be predominantly on A15 area. There is a relevant Oxford University paper which he will pass

on for inclusion on the website. There is a high level of danger with these units and the fire service have no guidance on dealing with lithium battery fires.

**6. Motion proposed.**

- a. Alan Anderson put forward a form of words for the motion proposed:

To request the Parish Council consider using the comments made this evening and duly note in their response to the Planning Inspectorate regarding the Springwell Scoping Report. Together with communicating the aforesaid to the Chief Executive of North Kesteven District Council, CEO of Lincolnshire County Council and Dr Caroline Johnson MP

The motion was seconded by several attendees.

- b. An amendment was proposed to remove the word 'consider' making a stronger statement of expectation.
- c. The following motion was tabled for a vote:

**To request the Parish Council use all the comments made this evening and duly note them in their response to the Planning Inspectorate regarding the Springwell Scoping Report. Together with communicating the aforesaid to the Chief Executive of North Kesteven District Council, CEO of Lincolnshire County Council and Dr Caroline Johnson MP**

In favour – 72

Against – 0

Abstentions – 3

**Motion carried unanimously.**

**7. Chairmans closing remarks.**

The chairman thanked the minute taker and speakers, the Parish Council for use of the Hall and those present for attending.

The meeting ended at 8.50pm.

Minutes: Jules Wilkins

13<sup>th</sup> April 2023

## APPENDIX A

### PART 1 - COMMENTS RECEIVED VIA NO2SPRINGWELLSOLAR EMAIL ADDRESS

This document is structured with the relevant Scoping Report section extract followed by comment received.

#### 1. Rochdale Envelope

2.2.3. In order to maintain flexibility in the design, it is the Applicant's intention to use the 'Rochdale Envelope' approach within parameter ranges. The Planning Inspectorate's Advice Note Nine 'Rochdale Envelope' [Ref 2-1] provides specific guidance to applicants on the degree of flexibility that could be considered appropriate under the PA2008 regime.

##### **Comment Received:**

The Rochdale Envelope approach was developed to assist with the development of much large national infrastructure projects such as HS2 where at the start it is difficult to know what matters will be relevant as the project develops. This flexible approach is not appropriate for a development of this limited and static nature where the matters to be considered can be determined at the start. Its use in this context would be an abuse of the process allowing the Applicants to change their plans at will without proper scrutiny.

#### 2. Landscaping, Habitat Management and Biodiversity Enhancement

2.4.53. The Proposed Development will include landscaping, habitat management, biodiversity enhancement, and amenity improvements, which will be explored as the design progresses. This will be sensitivity designed to retain and enhance ecological and recreational connectivity.

2.4.54. Where possible, existing trees, hedgerows, public rights of way and Local Wildlife Sites would be retained.

##### **Comment Received**

The words 'explored' and 'recreational connectivity' are not specific enough again the information in the ES needs to be more specific.

#### 3. Lighting

2.4.61. The National Grid Substation compound, Project Substation compound, BESS compounds, and Collector Compounds would include lighting, in accordance with relevant standards, but will not be permanently lit.

##### **Comment Received**

Just lit after dark? Needs to be specific.

#### 4. Use of borrow pits

2.5.9. The use of borrow pits during construction of the Proposed Development will be considered as the design develops. The potential benefit of including borrow pits as part of the Proposed Development include:

- Allows extracted aggregate to be transported to construction locations (largely via site access tracks) within the Site.

- Generates significantly lower levels of Heavy Goods Vehicle (HGV) movements on the local highway network than importation of aggregate from commercial quarries.
- Reduces cost risks arising from double handling, importation from commercial quarries and landfill disposal.

2.5.10. The benefit of using borrow pits will be carefully considered against any potential environmental impacts. Further detail on the approach to identifying suitable borrow pit locations and justification for their inclusions as part of the Proposed Development will be provided as part of the PEIR and ES.

**Comment Received**

This is a cost cutting exercise allowing the Developers to quarry their own aggregate out of the heath sub-soils to use to build temporary roads and hardstandings; further details and approval from the Environment Agency should be gained. The land where borrow pits are excavated will never be returned to proper agricultural use and this procedure should be prohibited as unnecessary and open to abuse. Unnecessary as there is a limestone quarry adjacent to the proposed site. Open to abuse as there is no monitoring of the 'rubbish' that may end up being dumped in a pit rather than properly (and more expensively) disposed of.

**5. Construction Reinstatement**

2.5.16. A programme of construction reinstatement and habitat creation will commence during the construction phase.

**Comment Received**

The above statement is a contradiction in terms, the construction machinery and the work being carried out will be disruptive and will have an adverse effect on wildlife, surely 'during' should be 'after' and further specific detail is required.

**Regarding the solar equipment end of life recycling and agricultural land remediation:**

**6. Soils Management**

2.6.9. An Outline Soils Management Plan (oSMP) will be prepared and submitted with the DCO Application. The oSMP will follow the principles of best practice to maintain the physical properties of the soil, with the aim of restoring the land to its pre-construction condition at the end of the lifetime of the solar farm.

**Comment Received**

With regard to agricultural land remediation. The document states the land will return to agricultural use at the end of the 40 year period, will the ES confirm that if the development is approved all of the concrete bases, foundations, piles and all other sub-structure elements are grubbed up, crushed and recycled on site into aggregate and then removed for future construction use, also where necessary replacing any topsoils with a similar heathland soil where required?

If this land is not properly restored it will not be able to be farmed in a conventional manner, unable to be cultivated or harvested due to the potential damage to farm machinery. Wild

grasses and weeds will grow and it will look something like the old Butlins Filey holiday camp site does today. I like to see wildflowers growing but not 4,200 acres of them, when this best and most versatile land should be growing food crops

## 7. Above ground infrastructure decommissioning and DEMP

2.7.2 At the end of the operational phase, any above ground infrastructure would be dismantled and removed in accordance with industry best practice at the time. The use of decommissioned materials would follow the waste hierarchy such that they would be reused where possible before recycling and disposal were considered.

2.7.3. At the time that decommissioning would take place, the regulatory framework, good industry practices and the future baseline could have altered. The Applicant would consider and implement a Decommissioning Environmental Management Plan (DEMP) taking account of good industry practice, its obligations to landowners under the relevant agreements and all relevant statutory requirements. An Outline DEMP (oDEMP) will be submitted in support of the DCO Application, which will be secured by a DCO

### **Comment Received**

The ES should properly address this? At the moment solar panels at the end of their usable life are finding their way into landfill in Africa. As far as we know there is no recycling facility in the UK. The West's relationship going forward with China is uncertain.

Springwell should fully address these matters at this pre-planning stage.

The Lincoln Heath is a very fragile part of our county. The heathland soils are light in nature with an element of limestone particles within the growing medium, very free draining to the limestone brash subsoils which continue down to the water bearing strata which is the Central Lincolnshire aquifer which provides drinking water to many hundreds of thousands homes.

## **PART 2 – ISSUES FOR CONSIDERATION IN AN ES SPECIFIC TO THIS SITE**

**Flood risk and management:** the villages of Scopwick and Kirkby Green have been adversely effected by flooding particularly during periods of high rainfall with an increasing incidence in recent years. The problems created by old and poorly maintained surface water drainage and sewerage systems may be exacerbated by the hard landscaping and the solar panels themselves. This should be investigated at an early stage in assessing the suitability of the land for solar panels.

**Pollution:** the natural aquifer which is a unique feature of the Lincolnshire Heath and feeds the many springs and streams which occur along the site of the proposed solar development should be assessed and protected. The risks of pollution need to be assessed and monitored. In particular those associated with known risks of harmful chemicals from solar panels and battery installations.

**Protected Species:** the area is home to many protected species well adapted to the current landscape of open farmland and small woodlands. A full protected species survey should be carried out before construction begins and the habitats protected from development. The



area is home to the wild brown hare whose numbers have declined rapidly in recent years due to habitat loss. They are protected under the Wildlife and Countryside Act 1981 and listed as a priority species under the UK post 2010 Biodiversity Framework. The area is also an important habitat for birds of prey including the red kite, buzzard and barn owl. The number of barn owls is declining and this native bird was placed on the Red List of Birds of Conservation Concern (2021). Similarly the area has important populations of ground nesting birds namely skylarks and lapwings, both species named on the Red List as numbers have been subject to recent dramatic decline. Other animals reported in the area and protected by law include bats, hazel dormice, slow-worms and badgers. The area is also home to several populations of deer, whose populations range over fields threatened with being fenced off and covered with solar panels. At a time when the UK has been assessed as one of the most ecologically impoverished countries in the world, it is proposed to take large areas of open countryside and valuable wildlife habitat for industrial use.

**Health** of those living and working in the area should be considered particularly the effects on mental health. The pandemic highlighted the importance of being out in nature for our mental health. The considerable disruption of construction over many months together with the industrialisation of the landscape with high metal fencing, closely packed solar panels, lighting, CCTV and 3.5m high solar stations housing transformers on this vast scale will necessarily have a negative impact on mental health in an area which is used for both residential and recreational purposes.

Compiled by Mrs Jill Moran

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## **APPENDIX B – COMMENTS FROM MR MARC WILLIAMS**

The scoping document seems extremely one sided. As a Parish we need to ensure our voices are heard.

**1.1.1 commissioning RSK to prepare the EIA.** RSK are not an independent body. They have a biased towards these projects as their ultimate parent company invest in these projects. We should be pushing for a truly independent body. This should be clearly highlighted as a major concern by the PC. RSK are own by a major US private Equity firm called Ares who are directly involved in the Green Energy Market.

**1.5.3 RSK looking to take certain things out of scope in the EIA?** This seems to be a common strategy by solar factory developers. Similar strategy was deployed by Mallard Pass developers. We should strongly object. The following should not be taken out of scope - 5.2 (Glint & Glare), 5.3 (Heat & Radiation), 5.4 (Major accidents and disaster), 5.5 (Utilities), 5.6 (Human health), 5.7 (Material assets and waste), 5.8 (population) and 5.9 (Water).

**At 5.8 (Population) they reference a document known as LA 112.** LA 112 is not relevant they need to reconsider - LA112 is for transport projects this isn't a transport project (Design Manual for Roads & Bridges) There are major impacts to all the groups above as highlighted by the 95% who voted against this project in the last Parish meeting.

- 5.8.5- 5.8.7 Private Property & Houses
  - They see no impact on our properties
- 5.8.8-5.8.9 Community Land & Assets
  - They want this out of scope, they miss the point we live in this area for the outstanding natural beauty.
- 5.8.10-5.8.14 Agricultural & Development Land
  - I believe this contradicts much of what was published in the Neighbourhood plan.
  - How can they position this as out of scope when they are taking 4200 acres of Best Most Valuable farmland out of production.
- 5.8.15-5.8.18 Walkers Cyclists & Horse Riders
  - They see no impact and indicate this should be out of scope. For all of these groups the significant change to the landscape will have a material impact.
  - We are meant to be promoting health and wellbeing and the countryside is a key element of this.

**They say that in 40 years the site will be decommissioned and returned to prior condition.**

However if we consider 2.4.6, 2.4.19, 2.4.20, 2.4.21, 2.4.24, 2.4.27, 2.4.37, 2.4.38, 2.4.43, 2.4.48 this is clearly not going to happen. These areas are going to be covered in concrete to create hard standing platforms. This along with piling to create footings for the panels this land will never be used again for farming. What cast iron assurances will there be that ever piece of concrete will be removed from the land? Soil management 2.6.9 totally contradicts what's stated in 2.7.2 which states only stuff above ground will be dealt with

**Where does the significant amount of concrete required to convert this farmland into an industrial site meet any green credentials?**

- Concrete pillars for the panels
- Concrete under Independent Outdoor Equipment
- Concrete under inverters & Transporter Stations
- Concrete in Collection Compounds
- Concrete in Substations Compounds
- Concrete in Battery Storage Areas
- Concrete in National Grid Substation Areas
- Concrete in Transmission Tower

**There is going to be fencing at a minimum height of 2.5 metres up to 3m high, with CCTV up to 5 metres high also lighting.** The CCTV is a gross intrusion into our human rights with security tracking our right to roam freely in the countryside. We should object strongly on the ground of privacy and human rights.

**2.2 Rochdale Envelope** – This seems like an opportunity for the develop to materially change critical elements after a potential consent is granted. We should strongly object. With the resources available to EDF they should be in a position to fully scope and list everything before consent is granted.

**2.2.12 Extensive network of Public Rights of Way.** These have been in place for many years and were originally scoped by MR Eric Parker, these included 4 promoted walks. These walks will be fundamentally changed and spoilt. At a time when we are focussed so much on people's mental wellbeing this will have a significant detrimental impact.

**2.3.24 Cultural Heritage** – There are a significant number of Listed Heritage sites across the planned site. These sites will all have their outlooks spoilt by the development.

**2.4.62 Drainage** - There is already increased risk of flooding in the Scopwick area. The document 5.9.23 references Cook & McQueen (2013) when discussing runoff and potential impacts on flooding. This was a modelled classroom study on a tiny scale. It did demonstrate a small increase. They cannot seriously be using a classroom-based study to take Water out of scope. The potential change to drainage on a site this large could be significant.

**Red Kites are protected by Wildlife & Countryside Act 1981.** The protection of Red Kite is the longest continuous Conservation project in the World. There are several nesting in and around Scopwick house.

**2.5.9 Use of borrow pits** - can the planning inspectorate guarantee that these sites won't be filled with construction contaminates and then back filled. Ref 5.7 materials, assets & waste

**3.1.1 reasonable alternatives** - why has no alternative site or source of power generation been considered.

**4.10 Opportunity to enhance the environment WHERE POSSIBLE** – there is zero commitment – the only part of the EIA that isn't concrete.

- Panels shipped from China
- Concrete on the Land
- Alteration of Drainage
- Removal of Best most valuable farmland out of production resulting in increase in import and the associated carbon footprint

**5.5 Utilities** – How can they look to make utilities out of SCOPE

There is a significant risk with the Exolum Pipeline that crosses the Blankney estate. This pipeline is a critical piece of infrastructure and needs to be accessed at anytime.

**5.8.19 They are trying to indicate that there will be a positive Socio Economic impact.**

Whilst during the construction phase there may be a few extra hotel/B&B rooms rented out the longer-term cost will be much higher as potential tourist will avoid the areas and the impact on property could be devastating.

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APPENDIX C- Observations relating to Chapter 5 of the Springwell Solar Farm EIA Scoping Report (Mr John Woodward)

## 5. Environmental factors proposed to be scoped out

### 5.1. Introduction

5.1.1. As part of the EIA process and based on the information available to date, there are a number of environmental factors, as listed under Section 4.1 above, for which it is considered an assessment as part of the EIA is not justified, and therefore a standalone chapter is not proposed to be resented in either the PEIR or ES.

## 5.6. Human Health

5.6.1. It is proposed that consideration of the potential effects to human health as a result of the Proposed Development will be covered through the findings of other assessments undertaken as part of the EIA process, as follows:

- Air quality;
- Landscape and visual;
- Noise and vibration; and
- Traffic and transport.

### Detailed Observations on the arguments put forward for scoping out environmental factors from the EIA assessment

5.6.2. Each of these chapters within the EIA Scoping Report and subsequent PEIR and ES will consider the potential effects to human health within their own assessments. Outside of the EIA process, a glint and glare assessment will be undertaken (see Section 5.2 above), which will consider the potential human health effects from glint and glare.

5.6.3. There are a number of PRoW crossing the Site which might be used for recreational purposes. Any temporary diversions will be detailed in the Public Rights of Way Commitments, which will be submitted in support of the DCO Application.

**Observation.** Temporary diversions potentially lasting two years will substantially impact the community's freedom of the community to walk the local countryside with adverse consequences to their health and well being.

5.6.4. Any changes to PRoW will be agreed in consultation with North Kesteven District Council and Lincolnshire County Council in order to ensure there are suitable diversions or replacements in place. Impacts to users of PRoW are therefore expected to be minimised and where they do occur they will be short term and temporary. As such, it is not expected that changes to the PRoW will significantly impact recreational use of the Site and therefore it is proposed to scope this matter out of further assessment.

**Observation.** It is not clear whether all the current footpaths and permitted paths are covered in the text. This facility is enjoyed and valued not only by the parish but also by the surrounding wider community in the District. A reduction to any of these will impact all communities' freedom of the community to walk the local countryside with adverse consequences to their health and well being.

5.6.5. As any potential human health impacts will be captured by the aforementioned assessments and there are not expected to be any significant human health impacts outside of these assessments, it is proposed that human health is not subject to dedicated assessment and therefore excluded from the scope of the EIA.

**Observation.** The above observations fundamentally challenge the Report's assertion that "human health is not subject to dedicated assessment and therefore excluded from the scope of the EIA."

#### Population

5.8.7. As no significant effects are expected in relation to private property and housing, it is proposed that these matters be scoped out of further assessment.

**Observation.** The changes to the local environment arising from the proposed development will very inevitably impact the value of public and private residential property and housing in the area. This is a factor that should not be excluded from the EIA assessment.

5.8.9. As no significant effects are expected in relation to community land and assets, it is proposed that these matters be scoped out of further assessment.

**Observation.** The community benefits from its current environment as a rural agricultural area which the proposed development as a mega-sized industrial plant will fundamentally impact. Therefore this should not be scoped out of the EIA assessment.

#### Agricultural land holdings, development land and businesses

5.8.11. There are no other businesses present within the (development) Site boundary. There is no land allocated for employment use, nor are there any planning applications yet to be determined that will generate employment opportunities at the Site. Therefore this should not be scoped out of the EIA assessment.

**Observation.** While at present there are no other businesses, land allocated for business use, or planning applications for such within the Site, there nevertheless is the possibility that such, say as

small cooperative agricultural holdings or business enterprises being generated any time in future as an alternative to the proposed development. Therefore these should not be scoped out of the EIA assessment.

5.8.18. As the PRWC will minimise any potential impacts to walkers, cyclists and horse riders during the construction phase and no significant permanent effects are expected in relation to walkers, cyclists and horse riders during the operational phase of the Proposed Development, it is proposed that these matters be scoped out of further assessment.

**Observation.** As with 5.63 and 64 it is not clear whether all the current footpaths and permitted paths are covered in the text. This facility is enjoyed and valued not only by the parish but also by the surrounding wider community in the District. A reduction to any of these will negatively impact health and well-being.

### Conclusion

5.8.19. As no significant effects to population are expected across any of the five matters detailed in LA 112, it is proposed to exclude population from the scope of the EIA. However, socio-economic benefits as a result of the Proposed Development are expected with regards to:

- Increase in the level of temporary employment;
- The subsequent gross value added to the economy;
- Uptake in the occupancy rate for beds in local hospitality venues; and
- A small number of long term employment opportunities during operation.

5.8.20. Therefore, a Socio-Economic Benefits Statement will be submitted in support of the DCO Application, highlighting the positive socio-economic impacts of the Proposed Development on the local and regional area. This statement will be produced outside of the EIA process and thus to avoid any potential for confusion or repetition, the Applicant does not consider it necessary to consider socio-economic impacts in an EIA context as well.

**Observation.** The preceding observations demonstrate that the conclusions set out above in 5.8.19 are flawed in that the EIA proposes scoping out many factors of significance which will invalidate its very purpose. The missing factors should be made to be part of this EIA exercise.

John Woodward

27.03.2023