

24th June 2021.

Dear Sir/Madam

Re: Planning Reference 21/02403/SCOPE

I am writing this letter as the representative of members of the Scotton Residents Group, which comprises c.150 people from across the villages of Scotton, Brearton & Farnham who all have considerable concerns regarding the proposed construction of a solar farm in Scotton and the inherent impact it will have on the beautiful countryside we enjoy and have chosen to reside in.

Having reviewed the scoping documents for the Environmental Impact Assessment (EIA) for the proposed Solar PV Farm at Lawrence House Farm, Scotton, we have a number of concerns and observations which we trust that the Planning Department of Harrogate Borough Council will consider being constructive/appropriate for inclusion in the ES and thus, including our thoughts in your response to the applicants.

Initially, I would comment that the EIA Scoping Report states that 'GRIDSERVE is committed to working proactively with key stakeholders throughout design development', however no attempt has been made by GRIDSERVE or ARUP to engage or consult with Scotton Parish Council or local residents in Scotton and the surrounding villages who will be significantly impacted by the proposed development.

Our concerns are outlined below.

EIA Scoping Proposals

We consider that the proposals for the solar farm contravene with the following Harrogate District Local Plan policies:

- Policy NE4 requires that development proposals protect and/or enhance the character, appearance and local distinctiveness of the landscape, including protecting visually amenity and the setting of settlements.
- Policy HP2 advises that proposals affecting a heritage asset, or its setting, should ensure that those features which contribute to its special architectural or historic interest are protected or enhanced.
- Policy HP4 requires development proposals to be designed to ensure that they will not result in significant adverse impacts on the amenity of occupiers and neighbours.
- Policy HP5 advises that proposals affecting PROWs (Public Rights of Way) will only be permitted where the routes and the recreational and amenity value of the PROWs will be protected, or a satisfactory diverted route is provided. Opportunities for enhancement of the existing network or improved facilities should also be explored.
- Policy NE8 advises that the best and most versatile land (BMV), grades 1, 2 and 3a will be protected from development not associated with agriculture or forestry except where it can be demonstrated to be necessary.

The solar farm would significantly adversely impact the character, appearance and local distinctiveness of the landscape, the amenity of neighbours, the PROWs crossing the site and the local heritage assets.

The land at Lawrence House Farm comprises a combination of grade 2, 3a, 3b and 4 land, thus the grade 2 & 3a should be protected for agricultural use only.

The EIA Scoping report states that the development will include 'a dispersed vegetation corridor along the existing PROWs comprising sensitive planting proposals, designed to avoid 'tunnelling.'"

We disagree that 'dispersed vegetation' will mitigate the impact of the 'tunnelling' effect of the 3m high solar array and security fencing at 2.5m high, and will not compensate for the loss of extensive views of the countryside along the PROW.

Traffic and Transport

The EIA scoping report states that the proposed development would be unlikely to create any significant effects in relation to traffic & transport and whilst a TS and CTMP would be included, the applicants propose the Traffic & Transport assessment is scoped out of the ES.

We strongly disagree with these comments bearing in mind the construction stage is quoted at 32 weeks i.e. 7.5 months, involving the delivery of a significant number of solar panels, steels, timber etc. via articulated lorries, HGV's and vans.

The suggested access site (which we accept is not yet firmly determined), is directly opposite the village primary school, close to the nursery and the village football pitches, a totally unsuitable and potentially extremely dangerous site. Interestingly, the applicants have neglected to mention the school and whilst they suggest traffic is unlikely to create any significant effects, this is a major concern for the safety of parents, teachers, children and other road users. In 2018, NYCC undertook a series of traffic surveys which concluded that the junction of Low Moor Lane and Market Flat Lane i.e. the proposed access site by the school was dangerous. The recommended measures required could not be implemented as the site was too dangerous and whilst traffic calming measures were implemented these have had an unsatisfactory impact.

Access would involve articulated lorries, HGV's and vans using the narrow roads of Scotton, Farnham or Scriven, with houses directly alongside and very tight corners. The villages are popular with walkers, cyclist, pedestrians and horse riders and are already overburdened and totally unsuitable for large vehicles. In addition, access to Scotton will involve vehicles using the B6165 which again is totally unsuitable for large vehicles which cannot navigate the tight and narrow bends at Bond End and is supposed to be restricted to vehicles less than 7.5 tonnes. High Moor Lane is also referenced; however this is also a narrow road with sharp bends and a bridge making it also unsuitable.

The Scotton Community Speed Watch Action Group have been undertaking speed watch activities for the last 2 years with data provided direct to the police. The issues we face in the village of dangerous driving and speeding vehicles through the village, which, as mentioned above, is extremely popular with pedestrians, walkers, cyclists and horse riders, has been recognised by the North Yorkshire Police, Fire & Crime Commissioner who awarded us £19,363 to deliver our project titled "Making Scotton Safer" involving the installation of road safety initiatives which will begin within the next two months.

For these reasons a detailed assessment of Traffic & Transport should be include in the ES.

Noise and Vibration

The EIA scoping report states that noise & vibration during the construction stage would only be temporary, may have short term impacts, will not involve large amounts of construction material and is therefore to be scoped out of the ES.

We disagree with those comments bearing in mind the construction will be 32 weeks i.e. 7.5 months which is hardly short term. The site access is directly opposite the school and will involve articulated lorries, HGV's

and vans using the villages of Scotton, Farnham and Scriven where the roads are extremely narrow and build up with houses directly on either side of the road. The potential vibration/noise and possible damage from construction traffic must be considered in detail.

In addition, given the access location to the site and substation opposite the school, ongoing noise & vibration must be considered during the operation stage.

As a consequence, a Noise & Vibration assessment is entirely appropriate.

Landscape and Visual Impact (LVIA)

The Landscape and Visual Impact (LVIA) methodology states that 'All potential visual receptors of the proposed development have been considered in the visual assessment, and the selection of viewpoints has been made on the basis of securing publicly accessible representative views, such as representing views of users of a particular footpath.'

We disagree with this statement as the selection of viewpoints shown do not demonstrate the significant impact the solar farm will have, for example, there are no viewpoints looking north-east and south-west from the PROW, across the proposed development.

Whilst walking on the PROW people do not have a fixed view straight ahead, instead people tend to look around, enjoying the wide extensive views of the countryside which will be very significantly impacted by the proposed development, with the 3m high solar arrays destroying the views and creating an effective tunnel along the PROW.

In addition, there are no viewpoints which take into account the view from behind or to the side of the heritage asset Scotton Old Hall or from the higher levels of Scotton, for example St John's Road or Havikil Lane.

We therefore request that 10 additional viewpoints are included in the LVIA which represent the views across the development from the PROW and Scotton Old Hall. These are shown on the plan 'Proposed additional LVIA viewpoints', and are numbered 21-30, and would request further viewpoints from St John's Road and the top of Havikil Lane.

The site is undulating land which is impossible to screen and the solar panels will be visible from all roads and a vast number of private properties.

In addition, the proposed Zone of Theoretical Visibility has been generated from a receptor height of 1.7m, however this does not take into account the view from the first floor of residential property receptors adjacent to the site, therefore we request that this is taken into consideration for viewpoints 1, 2, 4 and 30.

We also note that the LVIA does not define a number of criteria therefore it is not possible to ascertain whether the LVIA will correctly measure the impact of the proposed development. These include:

- Landscape susceptibility criteria
- Landscape sensitivity criteria
- Value attached to views
- Visual sensitivity criteria

Other Matters

The PEA report (3.13) refers to a phase 1 habitat survey in February and ref 4.2.5 of the EIA scoping document refers to EclA being informed by the PEA and the scope it outlines. Please can we mention that it

is difficult to assess habits in February so this survey is unsuitable and the PEA have missed areas of priority wet grasslands habitat.

Can we suggest that Phase 2 includes the use of BTO hot-spot data for breeding waders, (Data centre and Defra breeding data sets are out of date for breeding waders including Curlew and Lapwing use/if not breed on the site).

Thank you for providing us with the opportunity to have input which we hope is constructive and helpful.

Kind regards

Richard Tallis

For & on behalf of Members of the Scotton Residents Group