

1. **What Happens if Mallard Pass Solar Farm Doesn't?(ExA - Q 1.2.6)**

1.1. The table below is a summary analysis of all solar projects contained in the Renewable Energy Planning Database (REPD) that are not in the NSIP process:

All Solar Projects that are **NOT** in the NSIP Process

No.	Status	Installed MW	Ground	Roof	Other
1,277	Operational	8,865	8,703	151	11
115	Under Construction	1,149	1,121	28	
10	Awaiting Construction (post appeal)	306	306		
1,153	Awaiting Construction	8,051	7,693	358	0
2,555	Sub Total	18,371	17,823	537	11
2	Under appeal	70	70		
530	Submitted	6,587	6,476	112	
532	Sub Total	6,657	6,546	112	
(95)	<i>Estimated failures</i>	<i>(1,271)</i>	<i>(1,250)</i>	<i>(22)</i>	
2,992	Total Projected	23,757	23,119	627	11
	Failures				
124	Abandoned	734			
122	Expired	956			
136	Withdrawn (inc appeal)	1,092			
294	Refused	3,219			
676	Total	6,001			
	Total	29,758			
169	Revised	1,779	(so potential double count)		
3	rounding/other	2			
3,935	Total Non NSIP Solar	32,810			

Failure Rate:

19.3% of Installed MW

17.9% of applications

Source: *Barbour ABI Renewable Energy Planning Database - April 2023 issue*

Note: *157 Entries do not state the installed capacity*

The table shows that 2,555 projects have received a planning consent with a total installed capacity of 18.37 GW, the majority of which is ground mounted.

There are a further 532 projects with applications pending, which have the potential to deliver 6.7GW

“Estimated Failures” is an estimate of the number and capacity of projects that will not get through to delivery for any of the reasons stated – so 95 of the 532 applications won’t proceed. This could be weighted against each failure reason to try and be more precise, but there is limited benefit in doing so given the quality of the data (e.g. there are 157 projects with no stated capacity, the majority of which have permission granted status).

- 1.2. In addition to the above, there is a further 3.96 GW within the NSIP consent process listed in the REPD as set out below:

Project Name	Installed MW
Cleve Hill Solar Project	350
Little Crow Solar Park	150
Riverside Energy Park (REP) (roof)	1
Awaiting Construction	501
Cottam Solar Project	600
Gate Burton - Solar & Energy Storage Park	531
Heckington Fen Solar Park	500
Mallard Pass Solar Farm	350
West Burton Solar Project	480
Sunnica Energy Farm (East and West)	500
Longfield	500
Planning Application Submitted	3,461

- 1.3. If we exclude those projects that are already operational and also those under construction, the total potential solar generating capacity within the REPD data is in the order of 17-18.5 GW.
- 1.4. If the MPSF project is not implemented there will be a negligible effect on the Net Zero as it is insignificant when considered alongside the capacity applied for/contained within the REPD dataset.

2. Who Will Do It IF MPSF Doesn't? (ExA Q 1.2.6)

- 2.1. The table below shows the number of projects and potential installed capacity contained in non NSIP planning applications submitted over the 12 month period ending 21 March 2023.

Quarter	No. Projects	Installed MW
Q1 2023	259	1,390
Q4 2022	170	1,360
Q3 2022	152	1,100
Q2 2022	135	1,690

The projects are spread nationwide and all contribute to the Governments Net Zero commitments. Even allowing for 20% failures, these schemes would deliver 1GW more than all schemes currently undecided within the NSIP process (noting again that no all applications have stated the proposed Installed MW, so the actual figure may be higher)

- 2.2. The REPD data (ex NSIP) suggests that there is no requirement for solar installations to be on huge scale in order to achieve Net Zero commitments. The market is already demonstrating that it has appetite for solar on a smaller scale and at current application run rates could achieve 70GW by 2035.
- 2.3. To the extent that the Government is set on a massive solar installation they should look further North. Currently listed for sale by is Sandside Hill, which covers over 8,000 acres and is adjacent to the Dounreay nuclear establishment (grid connection). The vast majority of the land is Peatland blanket bog with +/- 700 acres requiring restoration, which if completed would reduce emissions by 50,000 tonnes of CO2. Although it sits in a proposed SSSI, the combination of (temporary) solar production, onshore wind and peat restoration would be a triple win – and consistent with the Skidmore Review (3.6.8).

3. Land Use

3.1. The table below sources data from the REPD, the NSIP portal and the various project focussed websites.

REPD	NSIP	Scheme	County	Output (Mw)	Approx Acreage	Mw/Acre	Rank	Acres/Mw
	Y	Springwell		800	1,700	0.47	1	2.13
Y	Y	Cleve Hill/Fortress		350	900	0.39	2	2.57
Y	Y	Longfield		500	1,400	0.36	3	2.80
Y	Y	Heckington Fen	Lincs.	500	1,450	0.34	4	2.90
		Shotwick		72.2	225	0.32	5	3.12
Y	Y	Gate Burton (7k)	Lincs.	531	1,690	0.31	6	3.18
	Y	Oaklands Farm		163	540	0.30	7	3.31
Y	Y	Little Crow - Scunthorpe	Lincs.	150	500	0.30	8	3.33
	Y	Botley West		840	3,400	0.25	9	4.05
Y	Y	West Burton (7k)	Lincs.	480	1,947	0.25	10	4.06
	Y	Stonestreet Green		99.9	467	0.21	11	4.67
	Y	Tillbridge		500	2,471	0.20	12	4.94
Y	Y	Sunnica		500	2,500	0.20	13	5.00
Y	Y	Cottam (7k)	Lincs.	600	3,048	0.20	14	5.08
	Y	Tween Bridge		600	3,706	0.16	15	6.18
Y	Y	Mallard Pass	Lincs.	350	2,175	0.16	16	6.21
	Y	Byers Gill		180	1,240	0.15	17	6.89
	Y	East Yorkshire		400	3,000	0.13	18	7.50
Total				7,616	32,359	0.24		4.25
Total for Lincolnshire			Lincs.	2,611	10,810			

3.2. The applicant believes that large scale solar is the most efficient use of land for energy purposes and quotes government guidance that 2 to 4 acres are required per MW. The table shows that MPSF misses the guided range by some margin.

3.3. The applicant states that only 7,000 tonnes of wheat will be lost from annual production as a result of MPSF. That is enough to give approx. 1% of all UK households a loaf of bread every week of the year.

3.4. Natural England's first Statement of Environmental Opportunity is to "Manage and enhance the agricultural landscape and soils of the Kesteven Uplands, continuing the long tradition of mixed farming which has shaped the area, securing viable and sustainable food production, while seeking to enhance biodiversity and improve water quality and availability."

4. Good Design?

4.1. The area is described by Natural England as "a gently rolling, mixed farming landscape dissected by the rivers Witham and the East and West Glen." They go on to say "This is a deeply rural landscape which has a very small urban area".

4.2. Whilst the project design may well satisfy a tick box assessment, the fact remains that it is the wrong thing in the wrong place, destroys the rhythm and texture of the landscape and no amount of mitigation will rescue it.

4.3. That is not to say that solar infrastructure can't be designed well and located appropriately. Within the table at 3.1 above are several schemes that might be considered to fit those criteria.

4.3.1. Shotwick Solar Park



- Adjacent to an industrial park, so consistent with the existing “sense of place”.
- Compact flat site – short perimeter, single space;
- Provides 60% of the energy needs of the adjacent UPM paper plant.

4.3.2. Little Crow Solar Park, Scunthorpe



- Adjacent to the steelworks, so arguably consistent with the existing “sense of space”
- Screened by existing woodland to the North/East/South so almost invisible from those perspectives
- Compact flat site – short perimeter, a “single space”

5. Funding

- 5.1. The project is structured as a single purpose entity.
- 5.2. The funding statement provides no details other than stating that Canadian Solar will provide £245m in funding. Given the national importance of the project should the Examining authority not be asking for further and better information – for example is the funding as debt or equity or a combination (in what proportions and at what rates of interest)?
- 5.3. Canadian Solar are not providing any form of corporate guarantee to support the project entity. In the event of project failure and at the end of project life there will be no recourse to anything other than the assets of the project vehicle (which by definition will be defunct equipment).
- 5.4. Anecdotal reports are that the project will pay back within 11 years – so there will be significant amounts of money flowing through the project from British Electricity consumers to Canada/China. This doesn't really fit well with the circular economy referred to in the Skidmore review so the Secretary of State should seek to ensure that UK tax receipts from the project are maximised.

6. Compulsory Purchase Powers

- 6.1. The applicant is applying for powers to compulsorily purchase several thousand acres of land from farmers who have curated the area for generations. Whilst some land owners have agreed to lease their land for the project duration, others have not agreed terms and may not be able to do so due to an inappropriate amount of the project's business risk being passed on to landowners, particularly in regard to project failure and end of operational life.
- 6.2. In summary, by granting the applicant compulsory purchase powers, the Secretary of State will be authorising a foreign entity the power to take land owned by UK nationals in order to profit from other UK nationals – which seems more than a bit wrong to me.

That's it – I've run out of time so don't have time to fully explain the following two pages which are:

- The schedule on the following page. It is the REPD extract showing the planning outcomes for all items that list the Planning Inspectorate as the Planning Authority. It probably speaks for itself.
- A recent article by Andrew Tettenborn (Professor of law at Swansea University). I've **bold underlined** the point I wanted to focus on but the whole piece is worth reading.

Needless to say, expecting the general public to be able to self fund and counter in six months what has taken the applicant two years, an army of professionals and a boat load of money makes David v Goliath look like a fair fight!

Item	Record Last Updated	Site Name	Technology Type	Installed Capacity (MW/elec)	Development Status	Date	Development Status (short)	County	Comment
1	Sep-18	Brechfa Forest West	Wind Onshore	57.4	Operational		Operational	Dyfed	
2	May-18	Burbo Bank Extension (Burbo Bank 2)	Wind Offshore	258.0	Operational		Operational	Offshore	
3	Feb-22	Clocaenog Forest Wind Farm	Wind Onshore	96.0	Operational		Operational	Clywd	
4	Sep-18	Drax Biomass Power Station - Unit 4	Biomass (dedicated)	645.0	Operational		Operational	North Yorkshire	
5	Aug-20	East Anglia 1 (EA 1)	Wind Offshore	714.0	Operational		Operational	Offshore	
6	Jan-15	Edmonton EcoPark EFW	EFW Incineration	55.0	Operational		Operational	London	
7	Jun-20	Ferbybridge Multifuel 2 (FM2)	EFW Incineration	70.0	Operational		Operational	West Yorkshire	
8	Oct-19	Galloper Wind Farm	Wind Offshore	353.0	Operational		Operational	Offshore	
9	Sep-20	Hornssea 1 - Heron & Njord	Wind Offshore	1,218.0	Operational		Operational	Offshore	
10	Sep-22	Hornssea 2 - Optimus and Breesea	Wind Offshore	1,300.0	Operational		Operational	Offshore	
11	Jun-16	Kentish Flats 2	Wind Offshore	49.5	Operational		Operational	Offshore	
12	Dec-19	Rampion Offshore Wind Farm (Hastings Zone)	Wind Offshore	400.0	Operational		Operational	Offshore	
13	Jan-22	Rookery South	EFW Incineration	65.0	Operational		Operational	Bedfordshire	
14	Mar-22	Triton Knoll	Wind Offshore	857.0	Operational		Operational	Offshore	
15	Apr-22	Dogger Bank A & B (was Creyke Beck A & B)	Wind Offshore	2,400.0	Under Construction		Under Construction	Offshore	
16	Apr-22	Dogger Bank C (was Teesside A)	Wind Offshore	1,200.0	Under Construction		Under Construction	Offshore	
17	Sep-22	East Anglia 3 (EA 3)	Wind Offshore	1,400.0	Under Construction		Under Construction	Offshore	
18	Sep-22	Sofia (Teesside B)	Wind Offshore	1,400.0	Under Construction		Under Construction	Offshore	
19	Jun-20	Solar Photovoltaics	Solar Photovoltaics	350.0	Planning Permission Granted	May-20	Awaiting Construction	Kent	Thames Estuary, subsequently sold & renamed Project Fortress
20	Jul-20	Cleve Hill Solar Project	Battery		Planning Permission Granted	May-20	Awaiting Construction	Kent	Thames Estuary, subsequently sold & renamed Project Fortress
21	Jan-20	Drax Re-Power	Battery	200.0	Planning Permission Granted	Oct-19	Awaiting Construction	North Yorkshire	
22	Apr-22	East Anglia 1 North (EA 4)	Wind Offshore	800.0	Planning Permission Granted	Mar-22	Awaiting Construction	Offshore	
23	Apr-22	East Anglia 2 (EA 2)	Wind Offshore	900.0	Planning Permission Granted	Mar-22	Awaiting Construction	Offshore	
24	Jan-23	Glyn Rhonwy (larger version)	Pumped Storage Hydroelectricity	99.9	Planning Permission Granted	Mar-17	Awaiting Construction	Gwynedd	
25	Mar-22	Hornssea 3	Wind Offshore	2,400.0	Planning Permission Granted	Dec-20	Awaiting Construction	Offshore	
26	Apr-22	Little Crow Solar Park	Solar Photovoltaics	150.0	Planning Permission Granted	Apr-22	Awaiting Construction	Lincolnshire	Adjacent to Scunthorpe Steel works
27	Apr-22	Little Crow Solar Park	Battery	90.0	Planning Permission Granted	Apr-22	Awaiting Construction	Lincolnshire	Adjacent to Scunthorpe Steel works
28	Oct-19	North London Heat and Power (Edmonton EcoPark)	EFW Incineration	70.0	Planning Permission Granted	Feb-17	Awaiting Construction	London	
29	Apr-22	Riverside Energy Park	Battery	20.0	Planning Permission Granted	Apr-20	Awaiting Construction	London	
30	Apr-22	Riverside Energy Park (REP)	Anaerobic Digestion	19.0	Planning Permission Granted	Apr-20	Awaiting Construction	London	
31	Apr-22	Riverside Energy Park (REP)	EFW Incineration	80.5	Planning Permission Granted	Apr-20	Awaiting Construction	London	
32	Apr-22	Riverside Energy Park (REP)	Solar Photovoltaics	1.0	Planning Permission Granted	Apr-20	Awaiting Construction	London	
33	Dec-21	South Humber Bank Power Station	EFW Incineration	95.0	Planning Permission Granted	Nov-21	Awaiting Construction	Humberstone	
34	Dec-22	The East Anglia Array - Norfolk boreas	Wind Offshore	2,100.0	Planning Permission Granted	Dec-21	Awaiting Construction	Offshore	
35	Dec-22	The East Anglia Array - Norfolk Vanguard	Wind Offshore	2,100.0	Planning Permission Granted	Dec-21	Awaiting Construction	Offshore	
36	May-22	Thurrock Flexible Generation Plant	Battery	150.0	Planning Permission Granted	Feb-22	Awaiting Construction	Essex	
37	Dec-21	TwinHub (previously called Wave Hub Floating Wir	Wind Offshore	32.0	Planning Permission Granted	Feb-22	Awaiting Construction	Offshore	
38	Apr-14	Swansea Bay Tidal Lagoon	Tidal Barrage and Tidal Stream	320.0	Planning Permission Granted	Jun-15	Permitted Expired	Offshore	UK Govt withdrew funding - no longer value for money
39	Jan-20	North Blyth Biomass Power Station	Biomass (dedicated)	99.0	Planning Permission Granted	Jul-13	Abandoned	Northumberland	Consent granted but project abandoned due to lack of finance
40	Jun-20	Tilbury Energy Centre	Battery	100.0	Planning Permission Granted	Mar-18	Abandoned	Essex	RWE state concerns over securing capacity
41	Feb-22	Mynydd y Gwynt Wind Farm	Wind Onshore	89.1	Appeal Refused	2015	Application Refused	Powys	Sec of State Overruled Planning Inspectorate's recommendation to approve. (2015)
42	Nov-15	Navitus Bay	Wind Offshore	75.0	Planning Permission Refused	Feb-21	Application Refused	Kent	Refused in part - increase to existing facility approved, additional facility refused
43	Mar-15	Fields Lock EFW	EFW Incineration	50.0	Revised		Revised	Hertfordshire	Submitted to Local council & subsequently refused
44	Jul-22	North Lincolnshire Green Energy Park	EFW Incineration	95.0	Revised		Revised	North Lincolnshire	Revised application is below at items 61-63
45	Oct-11	Brig y Cwn	EFW Incineration	77.0	Planning Application Withdrawn		Application Withdrawn	Mid Glamorgan	Promoter cited disjointed local waste policy (per BBC)
46	Dec-12	Roosecote Biomass	Biomass (dedicated)	80.0	Planning Application Withdrawn		Application Withdrawn	Cumbria	Centrica cited Govt preference to convert coal stations to biomass.
Planning Applications In/Awaiting Examination									
49	Feb-23	Cottam Solar Project	Battery		Planning Application Submitted		Application Submitted	Lincolnshire	
51	Feb-23	Gate Burton - Solar & Energy Storage Park	Battery		Planning Application Submitted		Application Submitted	Lincolnshire	
53	Mar-23	Hedington Fen Solar Park - Battery Storage	Battery		Planning Application Submitted		Application Submitted	Lincolnshire	
56	Apr-23	West Burton Solar Project	Battery	20.0	Planning Application Submitted		Application Submitted	Lincolnshire	
58	Apr-22	Sunnica Energy Farm (East and West)	Battery		Planning Application Submitted		Application Submitted	Cambridgeshire	
60	Apr-22	Longfield	Battery		Planning Application Submitted		Application Submitted	Essex	
63	Nov-22	North Lincolnshire Green Energy Park	Battery	30.0	Planning Application Submitted		Application Submitted	North Lincolnshire	Revised version
66	Dec-21	Drax Power Station - Bioenergy with Carbon Captu	Biomass (co-firing)		Planning Application Submitted		Application Submitted	North Yorkshire	Revised version
61	Jul-22	North Lincolnshire Green Energy Park	EFW Incineration	95.0	Planning Application Submitted		Application Submitted	North Lincolnshire	
64	Apr-22	Boston Alternative Energy Facility (BAEF)	EFW Incineration	102.0	Planning Application Submitted		Application Submitted	North Lincolnshire	
65	Jul-22	Medworth EFW	EFW Incineration	58.0	Planning Application Submitted		Application Submitted	Cambridgeshire	
62	Nov-22	North Lincolnshire Green Energy Park	Hydrogen	10.0	Planning Application Submitted		Application Submitted	North Lincolnshire	Revised version
48	Feb-23	Cottam Solar Project	Solar Photovoltaics	600.0	Planning Application Submitted		Application Submitted	Lincolnshire	
50	Feb-23	Gate Burton - Solar & Energy Storage Park	Solar Photovoltaics	531.0	Planning Application Submitted		Application Submitted	Lincolnshire	
52	Mar-23	Hedington Fen Solar Park	Solar Photovoltaics	500.0	Planning Application Submitted		Application Submitted	Lincolnshire	
54	Dec-22	Mallard Pass Solar Farm	Solar Photovoltaics	350.0	Planning Application Submitted		Application Submitted	Lincolnshire	
55	Apr-23	West Burton Solar Project	Solar Photovoltaics	480.0	Planning Application Submitted		Application Submitted	Lincolnshire	
57	Apr-22	Sunnica Energy Farm (East and West)	Solar Photovoltaics	500.0	Planning Application Submitted		Application Submitted	Cambridgeshire	
59	Apr-22	Longfield	Solar Photovoltaics	500.0	Planning Application Submitted		Application Submitted	Essex	
67	May-22	Awey Mor Offshore Wind Farm	Wind Offshore	402.0	Planning Application Submitted		Application Submitted	Offshore	
68	Sep-22	Dudgeon Extension Project	Wind Offshore	2,600.0	Planning Application Submitted		Application Submitted	Offshore	
69	Apr-22	Hornssea 4	Wind Offshore		Planning Application Submitted		Application Submitted	Offshore	
70	Sep-22	Sheringham Extension Project	Wind Offshore	317.0	Planning Application Submitted		Application Submitted	Offshore	

Andrew Tettenborn – Spectator 14 February 2023

Say it quietly, especially when there's a Green listening: but there's one certainty about Net Zero 2050. It won't happen. As any honest MP will admit in private, it is stymied not only by the need to keep the lights on following the Ukraine energy shortage, but also for another reason: because no democratic majority will tolerate the cutbacks in their quality of life necessary to maintain the headlong dash to carbon neutrality in 27 years' time.

Unfortunately there is also another certainty about Net Zero. While it remains official policy, however quixotic, corporate capital is being handed a heaven-sent opportunity at the expense of you, me and the country we live in. If you don't believe this, ask anyone who lives in rural East Anglia, between Newmarket and Soham.

Three years ago, a company called Sunnica proposed taking some 2,500 acres – four square miles – of good agricultural land in the area out of production and submerging much of it in photovoltaic plastic. Few people liked the plan. Several farmers refused to participate. And the three local authorities concerned with planning and the environment in the area, West Suffolk, East Cambridgeshire and Suffolk County, were viscerally opposed.

So was that the end of the scheme? Certainly not. In this era of Net Zero, any solar scheme over 50 MW counts as a National Significant Infrastructure Project, or NSIP. This means the final decision is made, not by local people, but those in Whitehall. The worries of residents, who don't fancy living in an energy factory, count for little. The same goes for farmers who prefer the idea of potatoes under their land to solar panels above it.

In Newmarket, the local Tory MP, Lucy Frazer, is understandably up in arms. Rishi Sunak himself has said that on his watch 'we will not lose swathes of our best farmland to solar farms.' We will see.

Such cases matter, since they are not isolated events. Sunnica is by no means the only organisation seeking to get the green light for plonking its profitable panels on to farm land. There is a similar scheme at Longfield near Chelmsford, in Essex, and yet another at Mallard Pass near Stamford in Lincolnshire. Both schemes are opposed by locals. So why the push to put panels on farm land? To the argument that brownfield sites would work just as well, the response put forward is usually the same: that land is too dear, and the scheme might struggle to break even unless developers are empowered forcibly to buy up virgin fields at agricultural prices.

All this should worry anyone, wherever they live. For one thing, food security is a problem in an overcrowded country, as is the lack of open non-industrial space: sacrificing both these things for the sake of ticking a box on some official green audit is first-rate folly.

For another, all this looks like a misuse of the NSIP regime. Fast-track central planning is all very well for government-initiated projects such as major roads or railways, or large single installations concerned with things like water or energy. It is far more questionable to use it when private companies are seeking to implement widespread land-use change over large areas of countryside which they happen to fancy.

Indeed, it's worth taking a closer look at some of the companies involved. Sunnica, the organisation trying to muscle in on rural Suffolk, is a British company, but its structure is rather complex. It is actually a joint venture involving two established solar developers, Tribus Energy and PS Renewables. The latter of these is, according to the firm itself, the 'customer facing name for Padero Solaer' – a joint venture between a Spanish and British company. Solaer, the Spanish part of this enterprise, is a subsidiary of Swedish investment vehicle EQT AB.

Should such firms be given priority over the views of locals? Clearly not. Yet if the scheme is given the green light, it will show what really matters in this debate: the race to Net Zero. It is hard not to conclude that there is something wrong with the government's worthy if foolish policy of carbon neutrality by 2050. At least as regards solar power, it is not working for the benefit of the people who live here – and certainly not for those who look after our land – but instead seems to favour a more international clientele.

What do we need to do? That the whole Net Zero idea needs urgent rethinking – and green activists need facing – is obvious. Meanwhile, however, the government must take steps to limit the use of the NSIP regime to genuinely home-grown projects. Not for the first time, the government seems to have allowed itself to be taken for a ride for fear of upsetting the green lobby. It is high time we stopped this process.

Written Submission.

Richard Williams – Interested Party No. MPSP-012
