

Gate Burton – Statement to Open Floor Hearing 2

I am speaking on behalf of 7000Acres, a local campaign group with over 850 concerned followers, including local residents and community groups.

We have two main points we wish to raise to the Examining Authority today.

The first point is with regard to health and wellbeing. We note that there does not appear to be an issue specific hearing which considers overall wellbeing in the context of communities impacted by solar developments at this scale – and multiples of such developments within a small region. We feel that this is a particularly important issue that has not been sufficiently well explored, as green spaces, acknowledged to play an important role in health and wellbeing, will be consumed at a scale and rate that may never have seen before in the UK. It is noted that the Applicant largely deems such impacts as “insignificant” or “minor”, but it would appear to be unfeasible to alter a region by installing 42 square km of solar panels and there to be such limited impact. We would therefore welcome the opportunity of an issue specific hearing to consider these matters in more detail.

The second point has arisen through the production of our WR's, where we have become increasingly concerned about the quality of material that is produced by the Applicant, and we were struck by the extent to which the Applicant appears to be able to provide their own evidence with which to convince the Examining Authority of their case.

I will provide some material examples:

The first area of concern we have is with the Statement of Need. We were grateful to the Applicant for having directed us to this document in response to our questions raised at the Preliminary Hearing.

Having read the document, it is striking that in over 130 pages of text, which topics the Applicant chooses to avoid, such as a description of what output solar produces in overall terms – the 9%-11% range which the Applicant must be aware of to be able to develop its business model. The 11% figure appears briefly in a table illustrating electricity generation per hectare, as an “Assumed Load Factor”. This is not properly explained anywhere in the document to be the upper limit of the scheme's annual output, thereby reducing 500MW of capacity to 55MW on average.

The applicant also avoids any description of how the output of solar is mismatched with demand, producing most when the country needs least, and nothing when the country needs it most.

It is therefore spectacularly selective for the Applicant to conclude that solar contributes to the UK's Security of Supply, describing the benefits arising from solar as providing diversity of energy sources, but omitting to reference the elephant in the room... what happens when the sun doesn't shine, particularly during a winter evening peak, when solar cannot be relied upon.

The SoN doesn't describe the fundamental problems Solar causes by having a mismatch between its output and the demand curve – and the need for “Curtailment”, i.e. being switched off by the Grid Operator because there is more power being generated than can be used. Perhaps the developer doesn't care, because generally speaking, they will be paid anyway.

Another example is where the applicant uses a graph of solar gain in the UK to describe the area as having high levels of solar irradiation – where patently the UK as a whole, is one of the lowest areas of solar gain worldwide, as can be seen by zooming out of exactly the same graph the developer has used as the source of its information.

I could go on, particularly in the selective reading of Government policy, where, despite the very recent ambition for 70GW of solar, there are, as there have been for many years, calls for efficient land use, community engagement and rooftop solar. Nevertheless, the Applicant has sought to find words that imply support for their monstrous proposal.

Such tricks are designed to create an impression of benefit or support, where in truth, such benefits or support have been overstated or oversimplified or carefully selected. The Statement of Need is clothed in the form of an “expert report”, – nominally “evidence” – with which to justify the Applicant's actions, but it is fundamentally a flawed document.

This approach by the Applicant to its “evidence” provided is not only limited to the Statement of Need.

Within various chapters of the Environmental Statement, the Applicant has made careful selection of its study areas and ranges of impact, to enable it to conclude that the effects of the development are frequently “minor” in nature. For instance, the Applicant has chosen an 8km radius for landscape assessment, which then specifically excludes the Lincoln Cliff Area of Great Landscape Value, just beyond this boundary.

By contrast, the Applicant has chosen the very broad area of the whole of West Lindsey and Bassetlaw, almost 1800 km², to consider socio-economic effects, which is so broad as to avoid the resolution that would require any reference to severe deprivation in Gainsborough, the main population centre immediately adjacent to the Gate Burton scheme, only 3km away. Then, in the same chapter of the ES, the Applicant has chosen an extremely narrow reference area, down to 500m, to consider other impacts, such as impact on Amenities or Residential Properties.

These examples demonstrate that the Applicant has drawn up its own terms of reference and details of methodology to be able to arrive at conclusions from impact assessments that suit its objectives, with words like “limited” or “minor” impact.

We have also noted the very valid set of First Written Questions raised by the Examining Authority, which sought clarification in some key areas of the proposed development and

provided the Applicant with the opportunity to improve the quality and accuracy of their material.

Sadly, it would appear the Applicant has not taken this opportunity and has continued to provide information that is either insufficient, partial, or deliberately misleading.

The Applicant was asked about the “Skidmore Review” directly. For the benefit of others in the meeting, this is an independent review of Net Zero, and how the UK can best deliver its targets that are most affordable, efficient and business-friendly. The Applicant’s reply includes the quote that the Skidmore Review calls for a “rooftop revolution” to achieve full-scale deployment of solar, but then the Applicant chooses to spend much of the rest of its response describing how the Government’s 70GW target would require 110 such similar 500MW schemes to Gate Burton, further missing the opportunity to inform the Examining Authority of the potential the called-for rooftop solar revolution could deliver. The Applicant also neglect to mention that intense pressure on land use needs a clear plan for how we manage competing demands – which is a further key finding of the Skidmore Review, which should be relevant when consuming land at scale is a primary feature of the proposed development.

The Applicant is asked directly to describe the energy production capacity of the scheme, and in an apparently long and thorough treatment of the subject, somehow the Applicant again fails to mention the range of 9-11% yield factor from solar, or any reference to mismatch between when solar produces its power and when is it needed.

The Applicant attempts to describe the importance of the scheme to the delivery of the UK Government’s Net Zero commitments, and the implications should the Gate Burton scheme not go ahead. Here, the Applicant uses distraction to point out the scarcity of 400kV connections, and their availability in the region. This relevance of this point pre-supposes the need for a high-voltage connection, and omits to acknowledge that solar can, and is, frequently connected to lower voltage systems, including domestic rooftop systems, far more quickly and efficiently than at 400kV.

The Applicant was asked about evidence of other solar schemes that could be brought forward. The Applicant refers to the National Grid TEC Register and the Government’s Renewable Energy Planning Database to make the need case for Gate Burton. These registers barely consider any rooftop solar, and certainly no domestic solar, therefore to assert that these sources evidence the need for the Applicant’s development, is once again, based upon partial information to suit the Applicant.

The Applicant describes not implementing the Gate Burton scheme as missing a “critical opportunity”. This is not true. In fact, the most obvious critical opportunity missed is repeated every day, with every domestic and commercial rooftop that is built without solar panels.

The conclusion to this point is that the Applicant must not be allowed to take the Examining Authority, this process and the people of this region of West Lindsey for fools, by providing such unreliable evidence.

Ideally, the grossly inefficient use of land for solar at this scale must stop now.

For the long-term view, we call for an integrated plan which considers the holistic routes to decarbonise our economy, looking broadly at sustainability of energy and food production, as well as land use, which should include contributions from independent experts, rather than the sponsored opinions of the Applicant's consultants.

However, for the immediate Examination, it is clear that the material provided by the Applicant is not suitable to be relied upon by the Examining Authority for a decision and must therefore be subject to independent, expert scrutiny.

Responses:

Response to a Question by GBEP

I thank the Applicant for their question.

The Applicant will note that in our statement we have been quite specific in the examples provided.

I would refer you to our WR on Decarbonisation and Energy for further details.
