

REFERENCE: GABE : IP-248

GATE BURTON SOLAR – DEADLINE 6 – 21 DECEMBER 2023

**National Policy Statement for Renewable Energy Infrastructure – November 2023**

EN-3 - 2.10.17 States: Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.

***The Gate Burton Solar Project is not a typical solar farm in the UK, it is a solar scheme on an industrial scale – it does not equate to the paragraph above. This solar site is ten times larger and does not show sensitivity to the surrounding environment and landscape. It will consume 1,690 acres of good quality farmland.***

***I do not believe the Applicant has demonstrated the use of agricultural land to this size and scale is necessary.***

EN-3 - 2.10.98 - Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.

***Gate Burton cannot be considered a good design even in isolation when the cumulative effects of three further NSIP solar schemes within such close proximity totalling 10,000 acres are with the Planning Inspectorate. Gate Burton cannot be considered anything other than industrialisation of the landscape (farmland) with all the associated hardware and combined with the scale and size of the solar panels will only be incredibly damaging to the area, the cultural heritage, to the bio-diversity, the flora and fauna, wildlife, the environment, the affected communities.***

In the emerging National Policy Statement EN3 it is clear that applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and Industrial land.

***I was informed by the Applicant's representatives at Consultation that brownfield sites were considered yet despite having asked which sites I have no knowledge of where these sites were, who Low Carbon approached and why they were unsuitable or ruled out. Please can the Planning Inspectorate request details from the Applicant, Low Carbon, of all the brownfield or other industrial sites referred to in EN3 above that were seen by the Applicant and the reasons for these to have been rejected.***

I believe along with solar panels on the roofs of houses, commercial buildings, factories, hospitals, car parks and brownfield sites there is also the capacity for **floating solar**. The greatest advantage of floating solar and rooftop solar is that it avoids land acquisition and site preparation issues associated with traditional solar installations. It opens new horizons to scale up solar power, particularly in countries with land constraints, including the UK, a tiny island with finite land resources and an ever increasing population.

Floating solar can produce a higher energy yield due to the cooling effect of water, the costs over time of floating solar are at par with traditional solar PV. Floating solar offers significant opportunities for the expansion of solar energy capacity and should not be dismissed as an opportunity for the UK which, surrounded by water, is an ideal vehicle for this.

Other European countries are proceeding along this route.

We are not the Sahara, we are not the one million square kilometres of scorched earth in Australia. While building PV plants with high efficiency around the world due to the high intensity of solar radiation in those regions, which could supply the Mediterranean area, North Africa, and Europe with electricity, the UK is a temperate climate that will not be able to produce energy from solar power when needed most in the winter months and which confirms the huge amount of land space, at least 40-50 times more than coal plants and 90-100 times more than gas, makes ground mounted solar in the UK inefficient. Differences in geographic location have a direct impact on the intensity of solar radiation in addition to changes in wind speed, humidity, dust, and air pollution deposits on the PV panel. Each of these variables cause low productivity and performance fluctuation in PV.

It is important that any solar expansion in the UK does not take away good quality farmland.

P A Mitchell

December 2023