Summary statements from 7000Acres regarding matters that they have previously raised during the examination that have not been resolved to their satisfaction.

Gate Burton Deadline 7

4 January 2024

Introduction

7000Acres is a collection of concerned residents formed from over 30 villages in and around the footprint of the Cottam, West Burton, Gate Burton and Tillbridge Solar Farm Projects. We have over 1,000 members.

We retain many concerns regarding matters that have not been resolved to our satisfaction. In general, the Applicant has not engaged in the Examination process by providing further details or clarity on the need for the scheme and how they will mitigate the major harm it will cause to the area. Instead, they have merely repeated their flawed case in response to the issues raised by Interested Parties and in the ExA's Written Questions.

The Need

The need for solar vs. the need for large-scale ground-mounted solar

7000Acres agree there is an urgent need to decarbonise. We recognise that solar has a role to play in decarbonisation and that the UK Government has set out an ambition for 70GW of installed solar capacity by 2050. *However, while the headline figure of 70GW has been frequently quoted, it is vital that the anticipated contribution of the 70GW solar capacity is understood, as part of the overall picture of need.*

<u>National Grid FES (Future Energy Scenarios) expects solar to make a relatively modest</u> <u>contribution by 2050; between 7% and 10% of UK electricity demand</u> (even in scenarios of up to 90GW of installed solar capacity). For that output, FES 2023 (Data Workbook)¹ expects solar may account for up to 25% of the UK's installed generating capacity. For context, wind would account for 43% to 47% of installed capacity but is expected to contribute between 69% to 72% of national demand.

At the core of 7000Acres concerns is that <u>the potential benefits of solar do not warrant</u> <u>ground-mounted deployment at such large scale, with all the attendant consequences.</u> <u>7000Acres therefore strongly reject there is a need case for extensive ground mounted solar</u> <u>deployment in the UK</u> as the primary route to delivering the Government's 70GW ambition. However, this does appear to be the current trajectory of applications, which continues despite repeated calls for a "rooftop revolution" as a means of delivering solar, such as in the Mission Zero – Independent Review of Net Zero (Skidmore Review)², and from the CPRE³.

¹ Future Energy Scenarios (FES) | ESO (nationalgrideso.com)

² MISSION ZERO - Independent Review of Net Zero (publishing.service.gov.uk)

³ <u>A rooftop revolution: turning possibility into reality - CPRE</u>

Cost

The Applicant has claimed the electricity generated will be "low cost" (Statement of Need 1.2.9) but this is false. Under the Contract for Differences (CfD) Scheme⁴ the Applicant will be paid an agreed strike price: the recent Contracts for Difference Allocation Round 5 resulted in a typical solar cost of £47 per MWh (CfD scheme prices are quoted in 2012 prices, with the latest indexation⁵ this is £64.56 per MWh). The peak generation of all solar will be around the middle of a sunny day in summer, when the typical grid price is frequently much lower, and already sometimes negative due to curtailment.

The graphs below are taken from BMReports⁶ (website of the UK Electricity balancing and settlement market), and show the first three Mondays of July 2023 (Monday is chosen as this is frequently the highest demand day of the week), and show that system prices are frequently significantly lower than the indexed strike price. For 03/07, the price falls to £-75 per MWh, but hovers around zero for much of the peak solar output period. For 17/07, the price plummets to £-185 per MWh, and is around £22 per MWh for much of the peak solar output period. These figures demonstrate the relatively low spot market prices of electricity during periods when solar output is at its greatest, and the relatively high cost solar will be paid during these periods, through CfD prices.

Over the same period, the weekly average prices ranged from £115 per MWHr to £125 per MWhr (Electricity Prices: Forward Delivery Contracts, Weekly Average, from Ofgem)⁷, which provides an indication of the much higher cost of energy during periods at other times of the day, when solar is not able to contribute to the electricity system.

⁴ <u>https://assets.publishing.service.gov.uk/media/64fa0473fdc5d10014fce820/cfd-ar5-results.pdf</u>

⁵ <u>AR6 Core Parameters (publishing.service.gov.uk)</u>

⁶ Electricity Data Summary | BMRS (bmreports.com)

⁷ Wholesale market indicators | Ofgem

This demonstrates that, while the Applicant may argue the cost of deploying solar is low, <u>the</u> value of when the bulk of solar energy is produced in the UK, is already when prices are among their lowest, and therefore this must be considered when weighing the benefits and impacts of large-scale ground-mounted solar installation.



As raised by 7000Acres in Section 2.2.2 of 7000Acres WR REP2-080, suppliers are already identifying ways to encourage energy usage during periods where it is anticipated that solar generation will be high, by offering half-price tariffs during this time. <u>Therefore, in the</u> <u>context of when the energy is available and how it can be used, paying £47 per MWh</u> (indexed to £64.56 per MWh in 2023 prices) is not low cost.

The Benefits

The volume of energy the scheme will deliver

We have already touched on the relatively small contribution solar will make, even with 70GW of solar capacity installed. At its heart, this is because <u>the UK has very low levels of</u> <u>solar gain on a global scale</u>. This should make the UK an unlikely choice for some of the largest concentrations of ground-mounted solar capacity in the world. Nevertheless, the 4 NSIP schemes in West Lindsey could see development on a similar scale to the largest schemes in China or India, notably in areas with much greater solar gain, and far fewer pressures on land use.

Recognising that, even if 90GW of solar will only deliver up to 10% of energy production, <u>a</u> <u>500MW solar scheme would contribute only 0.055% of the UK's annual demand</u>. This cannot be considered to be a sufficiently material contribution to the energy system to warrant the harms associated with ground-mounted solar development at the scale proposed.

Countries must make use of the natural resources they have, in order to maximise yield. This point is made by the technical author of the Applicant's Statement of Need, in a separate paper "Power System Fundamentals"⁸, which states that, located in north-west Europe, the UK "has potential for plentiful wind generation but has low solar generation potential".

The scheme being proposed by the Applicant is being considered for "overplanting", i.e. with capacity installed greater than the grid export capacity. This "builds in" a certain level of self-curtailment. It means that solar panels in this area, which is already one of the lowest areas of solar gain worldwide, would, by design, then have a deliberately reduced output. These would be some of the lowest yielding panels anywhere on earth. Perhaps in an economic spreadsheet such a decision would make sense, but in terms of deploying resources efficiently to decarbonise, this is a backward step.

⁸ Humbeat Limited - Resources

The importance of when energy is delivered

In terms of benefits, 7000Acres have highlighted other limitations with solar generation, particularly the mismatch between greatest demand (heavily biased towards winter evenings), and greatest electricity production (summer days, typically with lower demand). This is of particular concern given the limited options for long-term energy storage, i.e. season to season, rather than the short-term BESS facility proposed by the Applicant. Production without the ability to use in the moment or store, will lead to energy being wasted, or "curtailed". <u>Uncontrolled deployment of solar will result in more curtailment, therefore a less efficient and more expensive path to decarbonisation, ultimately resulting in higher energy bills for consumers.</u> Section 2.1.3 of 7000Acres WR REP2-080 further describes the scale and cost of curtailment, and Section 7.3 of 7000Acres WR REP2-080 considers the Applicant's treatment of the subject in the SoN.

Security of Supply

The Applicant has claimed that solar enhances security of supply, by adding diversity of energy sources to the electricity system. In terms of security of supply, the primary challenge is to keep the lights on and meet demand. The Applicant has glossed over the fact that, <u>even with 70GW of solar capacity installed, none of this can be counted on to meet peak demand</u>, which is on winter evenings. The security of supply gains from having a contribution of up to 10% of solar per year on the electricity system are therefore relatively minor. For the Applicant to state the minor advantages of solar in security of supply, without addressing the "elephant in the room", i.e. that <u>solar won't contribute to security of electricity supply when the country needs power most</u>, is an example of partial information presented to the Examining Authority. This is further discussed in Section 7.2 of 7000Acres WR REP2-080, which also describes the Applicant's limited treatment of the potential of solar to contribute to the UK's Capacity Mechanism, which is the primary market tool for ensuring sufficient electricity capacity is available to National Grid (system adequacy).

The Harms

Land use 1: Overall

The Applicant has not addressed one of the key points raised in Section 1 of the 7000Acres WR REP2-080, which is that there are exceptional pressures on land use in general, and cropland in particular, much of which come from the need to decarbonise, therefore the extensive and uncontrolled use of land for large scale ground mounted solar will only serve to exacerbate this problem, impeding requirements to plant 30,000-70,000 hectares of trees per annum and establish peatlands. In their analysis of land use for decarbonisation, the UK Climate Change Committee make no reference or allocation to land being used for extensive large-scale ground mounted solar. The Government has already been criticised for "overpromising" finite land with its multiple ambitions for land use in a report by the Royal Society on the subject of Land Use. The Government has recognised the competing tensions for land use and has committed to developing a Land Use Framework. The pressure on land use is also highlighted in the Skidmore review.

<u>The Applicant has focused solely on the 3a/3b debate, in terms of Agricultural Land</u> <u>Classification, and has failed to address the issue of overall pressure on land use, or</u> <u>acknowledge the role it is playing in exacerbating this situation</u>.

Land use 2: Agricultural Land Classification

We retain our concerns over the ALC methodology applied by the Applicant. The Applicant has not addressed our concerns, merely repeated their initial flawed assessment. 7000Acres agrees with West Lindsey Council (Local Impact Report - Gate Burton.2.0 - Socio-Economic and Land Use 20.6) where they state:

"The Scheme will impact 147 hectares of Best and Most Versatile (BMV) during construction. Moreover, the ES has not used an established methodology for either ALC assessment or the socio economic impacts on the affected farms (displaced tenants and workers, agricultural supply chain etc), and this favours their assessment of effects."

Adverse impacts on decarbonisation efforts

Three major reports have been published this year that assess the decarbonization of the power sector and the UK's current progress towards delivering on that goal. In doing so, they describe the main challenges and the extent to which solar plays a role.

These reports come from the UK Climate Change Committee (CCC)⁹, the National Audit Office (NAO)¹⁰, and by the Business, Energy and Industrial Strategy Committee (BEIS)¹¹.

Together, their most pressing concerns are:

- The need for overall co-ordination and planning of the energy system
- The resolution of grid connection issues especially to deliver offshore wind generation
- The inadequate pace of deployment of wind and nuclear power generation
- The need to manage energy flexibility and intermittency of renewable energy sources

Solar simply does not feature in the landscape of key challenges to be overcome for the UK to deliver on decarbonising the power sector.

Extensive deployment of large-scale ground mounted solar will serve to impede decarbonisation efforts by:

⁹ Delivering a reliable decarbonised power system - Climate Change Committee (theccc.org.uk)

¹⁰ Decarbonising the power sector - National Audit Office (NAO) report

¹¹ Decarbonisation of the power sector (parliament.uk)

- Creating a significant additional pressure on land-use (see above). Solar can be deployed on rooftops, thereby removing a source of pressure on land use. The choice of developers to pursue the economic opportunity of large-scale ground-mounted solar puts more pressure on land – a finite and precious resource in the UK, which must also meet demands for housing, commercial development, food production – as well as making its own contribution to decarbonisation, through planting forests and establishing peatlands.
- Diverting scarce resources vital for higher priority decarbonisation efforts. There are already shortages of skilled engineering staff, transformers and high voltage equipment. With the key priority being identified being the need to deploy the grid infrastructure to support offshore wind, the unnecessary connection of solar to HV substations, miles from the panels, puts additional pressure on this supply and skills chain (Recommendations 14 & 15 from the Electricity Commissioner's Report¹²).
- Sterilising strategically important grid connection points. To decarbonise, it is
 understood that the country will need further nuclear reactors (including small
 modular reactors), electrolysers and other equipment. Such equipment will require
 high voltage, high power grid connections, and their use for solar schemes will
 sterilise these connections for decades. The consequence of this will be the need for
 yet more grid infrastructure, and / or a delay of such technology being deployed.
- Displacing crops. By covering productive farmland with solar panels, the crops grown within the region would need to be produced elsewhere. These crops are a mixture of food for people, animal feed and crops for biofuels. There is no consideration as to the net carbon effect of these crops being displaced, nor potential impacts on food security.

Timespan

The revised EN-3 (November 2023) 2.10.65 states that an *"upper limit of 40 years is typical"*. The Applicant is seeking approval for 60 years, which when the construction period is taken

¹² Electricity-Networks-Commissioner-report-to-SoS.pdf (esc-production-2021.s3.eu-west-2.amazonaws.com)

into effect, will permit the system to be operational until circa 2089. Ground mounted solar panels will be obsolescent long before 2089, so this extensive period of time is not required. The Applicant has not explained why they need consent for such an extensive period of time, and not the "temporary use" identified in EN-3.

For locals, residents and visitors, the experience of the scheme will not be temporary. It will be permanent, occupying the majority and if not the entirety of their lifetime.

Size of the Scheme

EN-3 (November 2023) describes a typical 50MW solar scheme as being 125 to 200 acres in size. Although it does state that size will vary, there is no support for a scheme over ten times that size.

Height of the Solar Panels

The Applicant has not provided a clear explanation why it is necessary to use solar panels that are 3.5m high, whilst other similar schemes, such as Sunnica¹³ or Stow Park use panels up to 2.5m high. Panels with a height of 2.5m could be screened almost immediately by typical Lincolnshire hedges and mitigate much of the visual impact.

Visual Impact

The Applicant has failed to address the concerns raised by Interested Parties. 7000Acres agrees with the WLDC assessment (Local Impact Report - Gate Burton.2.0 - Landscape and Visual 20.5.), where it states that:

"The Scheme will have an adverse impact on the landscape and character setting in West Lindsey throughout all the stages of the development and cannot be mitigated. When

¹³ EN010106-005906-December 23 information request.pdf (planninginspectorate.gov.uk)

considered in combination with the other proposed solar schemes, the entire landscape character of West Lindsey will be changed for decades to come."

Landscape Character

West Lindsey District Council's Written Representation states that, 'assessment of landscape assets does not appear to show regard for the local landscape character, including the impact on the designated Area of Great Landscape Value (AGLV), and visual effects.' In addition, the Council continue that they, 'are unclear as to why the applicant has continued to promote a project that has direct negative impacts upon it.'

Since the above assessment by West Lindsey District Council and throughout the Examination process, the Applicant has not amended the Scheme to accommodate the issues raised. In contrast, the Applicant has increased the Order Limits and maintained an unreasonably long life span of the Scheme of 60 years, as such, proposed mitigation measures are not valid and do not adequately alleviate harms.

Therefore, 7000Acres concludes that the above statement by West Lindsey District Council, still stands, and that significant harm will occur in relation to landscape character if the Gate Burton Scheme were to be approved and moreover that it is arguable that further harms will occur due to the increased boundary and time frame for the Scheme.

Health

7000Acres remain concerned there is no Health Impact Assessment associated with the proposed concentration of developments within the West Lindsey region. We maintain that a desktop review is not satisfactory, and understanding a broad depth of current quantitative data is essential.

We maintain that these projects should have been seen as one, as there is a cumulative impact effect on health and wellbeing that needs to be considered. As four separate single

schemes, this potentially negates an assessment, however as one scheme, this would definitely prompt one due to scale and potential impacts on people. By not doing this assessment, demonstrates the applicant's inability to clearly understand how the project will harm health and wellbeing in a rural community.

Socio-Economic

The breadth of area chosen for Impact Assessment is too wide and misses Gainsborough within the socio-economic study, area with some of the most deprived areas within the country. This should be considered to be a failing of the study.

The Applicant has provided only limited information which lacks transparency in its assessment of any jobs lost, or the nature of any jobs created. There is little or no evidence presented of community benefit through employment from the development, in an area that is in desperate need of jobs and prospects. The loss of farming livelihoods therefore can only be seen as an erosion of opportunity. This is particularly material as any perceived benefits of the scheme will be outside the region that is most severely impacted by the scheme, and which already suffers deprivation.

While the Applicant states their compliance with policies within Local Plans, the Applicant has not addressed the specific points raised by 7000Acres in highlighting the significant amount of work that has been carried out to develop plans for the future of the region. Despite being extremely conscious of climate change and actions to decarbonise the economy, this work makes no proposals for the development of large-scale ground mounted solar as a contribution to the development of the region. In particular:

 The industrialisation of an area of Lincolnshire through extensive deployment of large-scale ground mounted solar would serve to undermine the Agrifood ambitions of the Lincolnshire Industrial Strategy as well as the appeal for visitors and the ambition to improve areas of deprivation through the stimulation of the Visitor Economy.

- The Central Lincolnshire Plan sets out objectives for Land Use (protecting the resources of the county) as well as for Climate Change and Energy. Where solar does feature, it is primarily in relation to retrofit to buildings or incorporation into building design.
- The CLP sets out policies for Renewable Energy as well as the protection of landscapes. The criteria to be met for a renewable scheme to be acceptable are clear, including considerations of scale, impacts on landscape character, visual amenity amongst other issues. What is also clear is that meeting these criteria would be impossible for a scheme at the scale of GBEP.

Climate Change Assessment

7000Acres retains its concerns over the greenhouse gas (GHG) assessment made by the Applicant (Chapter 6: Climate Change Document Reference). The Applicant has repeatedly failed to provide further information on how it reached its conclusions. It still has not provided a meaningful assessment of the GHG emissions generated during decommissioning. It has not taken account of the GHG emissions caused by importing the crops displaced by the scheme. Many of the assumptions made by the Applicant are highly optimistic and so not consistent with Advice Notice Nine, which requires a reasonable worse case assessment.

Biodiversity Net Gain

The Applicant does not take a reasonable worse case approach when assessing biodiversity net gain. Natural England (Natural England, 2016) and the Planning Inspectorate (Alder, n.d.) both identify that there is limited evidence to support claims that utility solar increases biodiversity. A balanced expert report would have identified the relevant research and addressed the conclusions made in the Natural England research.

7000Acres agrees with WLDC (Local Impact Report - Gate Burton.2.0), where it states:

Ecology 20.11. "During construction, the Scheme will result in the loss, degradation and fragmentation of habitats. It will also cause disturbance to the flora and fauna of West

Lindsey. There is also the potential that the Scheme would introduce invasive species. Operational impacts of the Scheme could include light disturbance to bats and birds. There is also the potential that Battery and Energy Storage System (BESS) will generate noise attraction or disturbance. Maintenance activities could also have an impact on ecological receptors."

These adverse effects have not been addressed by the Applicant.

Battery Energy Storage System (BESS) Safety

The Applicant has failed to address the concerns raised over BESS safety. It is acknowledged that this is emerging technology, but as the Applicant has chosen to adopt a Rochdale Envelope then their assessments must be based on a Reasonable Worse Case Assessment (Advice Notice Nine). A Reasonable Worse Case Assessment would be to base their safety case on current technology and current safety requirements.

In particular, the Applicant has not taken account full account of a BESS Thermal runaway, the release of toxic gases and the impact of the polluted firewater on the local environment. Water storage, bunding and fire water storage should be secured in the DCO.

Cumulative Impact

NPS EN-1 4.2.6 and Advice Notice Seventeen require the Applicant to consider how the "accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place."

The Applicant has failed to do this in their responses shown in Chapter 16:Cumulative Effects and Interactions (EN010131/APP/3.1), Technical Note: Additional Cumulative Schemes Document Reference (EN010131/APP/8.23 October 2023), response to the ExA's Second Set of Written Questions and the Joint Report on Interrelationships between

Nationally Significant Infrastructure Projects Version 3 (Document Reference: EN010131/8.26 (Gate Burton); EN010133/EX2/C8.1.8_A (Cottam) December 2023).

The Applicant only takes account of other schemes within 5km (Technical Note 2.1.9) of the Gate Burton solar industrial scheme. The distance of 5km does not take account of the regional nature of impact caused by 6 solar NSIPs (Gate Burton, West Burton, Cottam, Tillbridge, One Earth and Steeple), plus Stow Park and other emerging non NSIP solar and BESS developments. Furthermore, in Chapter 16 the Applicant appears to only take account of where two or more schemes can be viewed from a single point inside the scheme, i.e. the concurrent impact. There is no attempt to assess the cumulative impact when travelling through the region or from viewpoints outside the Gate Burton boundary.

The scale of development for an individual scheme is difficult to comprehend. The Joint Report on Interrelationships between Nationally Significant Infrastructure Projects, prepared by the Applicant (and others) includes some combined diagrams (see next page), but still falls short of providing a combined effect, for example by omitting Steeple Renewables in the local area map. Nevertheless, the diagram clearly shows that land for solar arrays dwarf the local communities they surround and are each larger than Gainsborough, the largest local town.

The Applicant's Technical Note and response to the Second Set of Written Questions merely repeat the flawed assumptions made in Chapter 16 and do not provide any additional information.



7000Acres retains its concerns regarding the cumulative impact of the 6 solar NSIP schemes, and other sub NSIP energy projects, on:

- Socio-economic impact
- Land use
- Health and wellbeing
- Landscape and Visual Amenity
- Glint and glare
- Transport and access
- Ecology
- Drainage and flooding
- Cultural heritage

The Applicant's glib and shallow assessment of the cumulative impact on the region is unacceptable and makes a very weak case. 7000Acres supports the conclusions made in the West Lindsey Council - Local Impact Report - Gate Burton.2.0. We also agree with the Lincolnshire County Council conclusion that:

"The cumulative change to the landscape will be considerable, and the combination of two or more sites has the potential to change the local landscape character at a scale that would be "of more than local significance" or would be "in breach of recognised acceptability, legislation, policy or standards". The cumulative impact of the four adjacent NSIP solar sites has the potential to effect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating an "energy landscape" as opposed to rural/agricultural one at present. This also has the potential to change the character from an agricultural landscape to that of an "energy" landscape when traveling through the area, and the sequential effects of multiple large scale solar sites, of which some are spread over extensive, fragmented redline boundaries, exacerbating the perception of being surrounded by solar development. In addition the loss of arable agricultural land of which at least 20% within the main development site and up to 50% of the required land for the cable route is classed as Best and Most Versatile agricultural

land would have a cumulative or defined negative impact that will result in the loss of agricultural production in the development area generally and/or the permanent loss of production from mostly medium quality agricultural land."

The Applicant's Approach

Throughout the Public Consultation the Applicant failed to consult in good faith. It made partial and misleading claims that resulted in 7000Acres writing to the Planning Inspectorate.

The Applicant has chosen to apply a Rochdale Envelope but has frequently failed to follow the requirements of Advice notice Nine. In particular, they have not consistently applied a reasonable worse case assessment, but instead taken an over optimistic approach to their benefit. For example, they have not taken full account of the GHG emissions generated during decommissioning, nor taken account of importing the crops displaced by this scheme.

Failure to adequately consider alternatives

Fundamentally, the Applicant has not challenged the explanation set out in Section 4 of 7000Acres WR REP2-080, that solar panels generate electricity at low voltages, and there is no inherent need for solar to be connected using high voltage grid connections. Nor has the Applicant challenged the statement that deployment on rooftops needs no grid-scale infrastructure adjustments, and typically needs little or no adjustments to local distribution networks. This explains why this approach therefore takes pressure of National Grid's queue for transmission connections.

It is noted that the Applicant has made no comment on the evidence provided in the 7000Acres WR, citing reports from the UK Warehouse Association and Ecotricity on the potential capacity for rooftop solar to make an overwhelming contribution to delivering the Government's ambition for 70GW of solar, there being, as a result, no real case for extensive ground mounted deployment.

The Applicant therefore has not challenged potential capacity for deployment of solar on rooftops as an efficient alternative to large-scale ground-mounted solar and has not demonstrated any credible consideration of this route as an alternative to meeting the

Government's ambition, having been solely focused on the availability of a high-voltage, high power grid connection.

Decommissioning Bond

7000Acres agrees with LCC (POST HEARING SUBMISSIONS ON BEHALF OF LINCOLNSHIRE COUNTY COUNCIL AT DL1 paragraph 9.e) that a Decommissioning Bond should be provided to ensure that sufficient funds are available to decommission the scheme in 66 years time (5 years to implement and 60 year time period for the scheme). This should be secured in the DCO: failure to do so could render the land unusable for farming and so the loss of land would be permanent and not temporary, as required by EN-3.

BESS

The Applicant has not clearly explained why a BESS of this size is required to support the solar generation

The Applicant has frequently provided incomplete or misleading information. For example, in their document Frequently Asked Questions regarding the Battery Energy Storage System ("BESS") Document Reference: 8.22 (Version 2) they state:

"2.2.1 The need for battery storage is supported by government policy. The government's National Policy Statements set out the government's policy for the delivery of energy infrastructure and provide the legal framework for planning decisions. National Policy Statement Draft EN-1 (March 2023) para 3.3.25 provides that "storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated"."

EN-1 uses the word "battery" once. EN-3 does not refer to batteries at all. EN-1 3.3.29 states that the Infrastructure Planning (Electricity Storage Facilities) Order 202043 removed all

forms of electricity storage, other than pumped hydroelectric storage, from the definition of nationally significant energy generating stations under the Planning Act 2008. Therefore, a BESS is outside the NSIP scheme and should be assessed as a stand-alone scheme and not consented under the Trojan Horse of a solar NSIP.

The Application is for a Generating Station. The main economic purpose of the BESS is energy arbitrage using the National Grid connection. As the solar scheme will only be capable of generating power during daylight, and only generate close to the claimed 500MW on sunny summer days, the BESS will be the main source of income between Autumn through Winter to Spring, and only source of income at night. Therefore, the BESS provides an additional source of income to the solar generating station. As it is an additional source of income, it is not Associated Development in accordance with the PA2008, Guidance on Associated Development Applications for Major Infrastructure Projects.

Summary

Based on the submissions made by LCC, WLDC, 7000Acres and other Interested Parties, the Applicant has not taken full account of the harm generated by the Gate Burton NSIP.

Additionally, the Applicant has not taken full account of the cumulative impact of this and the other 5 NSIPs, plus sub NSIP energy schemes, under consideration.

It is clear that the harm caused by this scheme greatly outweigh the limited benefits of this solar industrial plant. 7000Acres agrees with WLDC in stating:

"The Scheme will have an adverse impact on the landscape and character setting in West Lindsey throughout all the stages of the development and cannot be mitigated."

Therefore, as the Gate Burton Solar Project cannot be mitigated, it is evident that there is a strong case for refusal of the scheme.

The Applicants of such schemes are alone in seeking to justify the massive aggregation of solar panels and land they consume. 7000Acres observe that:

- Despite the urgent need to decarbonise, domestic and commercial rooftops continue to be built without solar panels, thereby missing the most obvious and quickest route to increasing solar capacity <u>every day</u>.
- There is an urgent need but the urgency is to do what is right, and what will make prudent use of the country's resources – looking holistically across energy, food and land use, acting with confidence in a way we will not look back on with regret.

Overall, it can be difficult to cover the ground of an entire application "in a nutshell", but in overall terms, pursuing decarbonisation through the deployment of **large-scale ground mounted solar is a clear example of pursuing compromised, short-term benefits, but suffering profound, long-term consequences. In these terms, the Gate Burton Solar Project amounts to a basic failure of sustainability**.