

Sent by email to  
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Your Ref: EN010131

Date: 4 January 2024

Dear Sir/Madam

**SUBJECT: GATE BURTON ENERGY PARK  
COMMENTS ON APPLICANT RESPONSE TO RULE 17 REQUEST  
(DOCUMENT REFERENCE: EN010131/APP/8.33)**

Further to the applicant's response to the Rule 17 letter and our previous letter of 21 December 2023 on this matter, Lincolnshire County Council has the following comments on the applicant's response.

**Assessment methodology**

In line with our previous comments, we welcome the applicant's use of IEMA's 'more robust' W1 method of assessing effects from waste. In particular, it is helpful that this new document shows estimated arisings of each type of waste during the Construction, Operational and Decommissioning phases of the project.

**Study Areas**

Whilst we generally support the applicant's use in Chapter 2 of an "expansive study area" for the management of waste, we are concerned:

1. By the choice (see 2.1.2) to define this as England for hazardous waste. Particularly in light of our comments below about the hazardous content of solar panels, this assumption is in conflict with the "proximity principle" and the applicant should be seeking to manage all arisings within the East Midlands. Indeed, a more detailed examination of the EA's WDI figures referred to in Table 5 shows that a combined 85% of the identified hazardous waste capacity lies across the North West, North East and South West regions which are all a considerable distance from the project

location. We would thus suggest it more appropriate to consider the East Midlands as the “expansive study area” for all wastes arising from the project.

2. That this data provides the current situation rather than the future forecasts given in each Waste Planning Authority’s Waste Local Plan. This is particularly important in light of our comments below regarding future landfill capacity.

### **Recycling of solar panels and other WEEE**

Despite the Examining Authority’s concerns regarding a lack of specialist capacity, the applicant continues to suggest (see 5.1.1) a recycling rate of 70% for all waste types including panels, stating that (see 5.1.6) “PV panels are recyclable and there are numerous examples of companies recycling them”. Whilst, as the applicant states, such facilities may exist in the future, it may be that their “absolute worst case” (everything to landfill) may be a reasonable assumption for solar panels as there’s no certainty of recycling facilities being available. Indeed, they’re forecasting (see Table 7) a large quantity of operational “module” waste for which the timescale will be much less than the 60 year lifetime of the project.

### **Hazardous landfill capacity**

The applicant’s Impact Assessment (chapter 6) assumes that only batteries are hazardous (see 6.1.6) but, unless they’re proposing to process the waste first in-situ – i.e. separating out non-hazardous elements of panels – the Council believe this should also include panels due to their hazardous content. This would make a significant difference to the overall assessment as Table 7 forecasts over 70,000 tonnes of “module” waste across the Operational and Decommissioning phases rather than the less than 1,000 tonnes of batteries currently assessed.

### **Other landfill capacity**

The applicant is correct (see 4.1.5) that “it is not... possible to accurately predict what will be the landfill void capacity in 25 years time, still less 60 years time” so, although we think it unlikely that void capacity will remain the same as it is now (see 4.1.8), we are unable to provide an alternative figure.

### **Impact Assessment for this project**

In light of all the above the Council believe a more accurate assessment of the impact of the project, and particularly of the expended solar panels, is as follows (based on the applicant’s methodology used in their Table 8), albeit it is acknowledged that this represents an “absolute worst case” scenario with no recycling capacity available.

	<b>Operation</b>	<b>Decommissioning</b>
<b>Baseline</b>		
Regional hazardous landfill capacity (m <sup>3</sup> )	657,000	657,000
<b>Scheme Waste</b>		
“Module” waste from scheme (m <sup>3</sup> )	122,752	111,593
<b>Comparison Against Baseline</b>		
%age of regional landfill capacity required for Scheme (assuming zero recycling/recovery)	18.7%	17.0%
<b>Assessment (“Absolute Worst Case”)</b>		

Magnitude of Impact	Major	Major
Effect	Very Large	Very Large
<b>Significance</b>	<b>Significant</b>	<b>Significant</b>

### **Cumulative impacts across proposed solar PV schemes**

The stated methodology for estimating the waste from other solar projects as similar to Gate Burton sounds reasonable but the applicant should be asked to clarify the following:

1. The Council has been unable to replicate their calculations from the stated site size (in MW), module capacity (650kW) and module weight (35kg) which appears to result in much lower waste arisings than those stated, both in Table 9 and for Gate Burton elsewhere. Please give a worked example of the calculation used.
2. Given that Tillbridge is the same size as Gate Burton (500MW), why does Table 9 show different figures for estimated waste arisings?
3. The assumption of a 5 year spread of decommissioning seems reasonable at first glance but landfill capacity is finite not per annum so it is more appropriate to assess based on the total waste rather than 20% of it as has been done.
4. Although, as stated, waste arising during the Operational phase will be more spread out than Decommissioning waste, it could still have a significant impact on landfill capacity and thus needs to be assessed.

### **Summary**

The Council's calculations and comments in this letter provide an alternative view on the potential impact of wastes arising from the proposed scheme. Whilst it is acknowledged that the assumptions suggested are very different to those made by the applicant, the Council respectfully requests that the applicant should be asked to justify their assumptions and, if necessary, revise their assessment.

I trust this is helpful.

Yours faithfully

**Neil McBride**  
**Head of Planning**