

Dear Madam

Application by West Burton Solar Project Limited

The 7000 Acres Group write to submit the following issues in relation to the agenda items for the Preliminary Meeting 7th September 2023 as requested in the Examining Authority's rule 6 letter, dated 10th August 2023.

- Agenda Item 2

The Examining Authority's remarks about the Examination process (refer to Annex B), including consideration of the interrelationship of Cottam Solar Project with other projects (refer to Annex C)

- The Preliminary Agenda Items 2 & 4 refers to the interrelationship of the Cottam Solar Project with other projects.

This is very confusing for all Interested Parties. Is this meant to refer to the West Burton Project? Is this a sign that like the residents and Interested Parties, The Planning Inspectorate is getting mixed up between the several projects in the West Lindsey District?

If this is a 'cut & paste' Rule 6 letter, as it would seem, Interested Parties are rightly confused and worried for the multiple Examinations ahead for the West Lindsey District.

This fundamental error needs to be rectified and an immediate correction sent to all Interested Parties so they can address any responses to the ExA correctly. In this instance, Interested Parties have been directed incorrectly by the ExA.

The 7000 Acres Group will transpose the *West Burton Solar Project* for the *Cottam Solar Project* for both these agenda items.

- The region has a relatively high level of an aging population and added to this a high degree of low income households. Both these factors translate to lower levels of engagement in the examination. Furthermore, due to the dispersal of the effected communities across the West Lindsey District, there is an immediate disadvantage for residents and communities sharing information and understanding the collective impact of the four Nationally Significant Infrastructure Projects.
- The Examining Authority needs to be aware that for many residents and Interested Parties it is very difficult to participate in events held during the working week and during working hours. Also, many people in the region are not able to utilise the videoconferencing facility provided. Broadband coverage is often slow and irregular in this rural area.
- In terms of the interrelationship of the *West Burton Solar Project* with the other projects, it is important for the ExA to have regard to this unique and unprecedented concentration of four solar NSIP's within the District, in contrast to any other scheme(s) in the Country.
- The fact that there are four projects in the District effecting residents locally and regionally means that Interested Parties become confused which scheme they are referring to at times. The confusion is made worse with the projects having similar names. These elements combined to form barriers for Interested Parties to respond to the ExA.
- In terms of Government guidance and policy, the ExA for the West Burton Solar Project states that this application; 'includes

development falling within Sections 14(1) and 15 of the Planning Act 2008.'

The ExA's for the Gate Burton Project and Cottam Solar Project, also make this assessment for these Examinations.

The Applicant for the Gate Burton Project states that no designated National Policy Statements apply to that particular Examination. The 7000 Acres Group agrees.

Therefore, as all the applications fall under the same Act and sections therein, it is reasonable to conclude that no designated National Policy Statements apply to the West Burton Solar Project and indeed the Cottam Solar Project.

- Agenda Item 4

The Examination Authority's remarks about the draft Examination Timetable (refer to Annex E), including consideration of the interrelationship of the *West Burton Solar Project* with the other projects (refer to Annex C)

- It is noted and appreciated that the Examining Authority has 'sought to maximise the time between Deadlines and events by minimising the number of Deadlines', however on cross referring the three projects (Gate Burton, West Burton and Cottam) which are either in examination or moving into examination, it is evident from an Interested Parties perspective that the timetables are not reasonable or achievable.
- For instance and first of all, the week commencing 21st August, the Procedural Deadline A for both the Cottam Solar Project and the West Burton Solar Project occur on the 22nd August and the 24th August respectively.

This same week, Hearings will be held for the Gate Burton Project, see below:

Gate Burton Energy Park

- 22nd August - Compulsory Acquisition Hearing 1
- 22nd August - Open Floor Hearing 2
- 23rd August - Issue Specific Hearing 2
- 23rd August - Issue Specific Hearing 3 (session 1)
- 24th August - Issue Specific Hearing 3 (sessions 2 & 3)
- 25th August - Accompanied site Inspection

Therefore, in this first instance, the project timetabling crosses over. This means that moving forward there are multiple occasions when timetabling is unmanageable for Interested Parties affected by these projects.

- Secondly, both the Preliminary Meeting and first Open Floor Hearings will be held for the Cottam Solar Project and the West Burton Solar Project on the 5th & 7th September with the Issue Specific Hearing 1 for the Cottam Solar Project on the 6th September.

It is noted there is no Issue Specific Hearing 1 listed in the timetable for the West Burton Project. If this Hearing is required, Interested Parties must be informed as soon as possible and thus made aware of any timetabling implications and impacts.

Please note that this week is also the start of the academic year for many local schools and colleges. This in turn means that many Interested Parties will not be able to attend these events.

Prior to the above, Interested Parties, have a further deadline to meet on the 1st September (Deadline 3 - Post Hearing Submissions plus other items) for the Gate Burton Project.

- Thirdly, on the 3rd October responses are needed by the ExA to further written questions (ExQ2, if required) plus other comments for the Gate Burton Project with Hearings commencing the week of the 9th October and predicted to run until the 13th. On the 17th October, Deadline 1 for the Cottam Solar Project occurs with requirements for Written Representations plus other comments by this date. The 25th October sees the publication of the ExA's further questions (ExQ3) for the Gate Burton Project and the 26th October is the Deadline 1 for the West Burton Project. Therefore, during the whole month of October 2023, deadlines, events, hearings, comments, evidence, information and answers are required by The Planning Inspectorate for the three projects cited. If Interested Parties do not meet these requirements it is reasonable to suggest we are not representing ourselves and our views as we would wish to do so and yet to be able to meet all these requirements is impossible for many people.

- Fourthly, the end of November also sees the three projects coming together.

On the 20th November responses are required to the ExA's further written questions (ExQ3, if required) plus other comments for the Gate Burton Project. On the 21st November, Deadline 2 occurs for the Cottam Solar Project, with requirements for comments, responses to ExA first questions plus other information and on the 30th November, Deadline 2 occurs for the West Burton Project. (Also, it is a possibility that the Tillbridge Solar Project will also come on stream at about this same time. If so, this will add further complications and great difficulty for Interested Parties to respond).

- Fifthly, the next day, on the 1st December, the ExA for the Gate Burton Project will provide commentary on and schedule of changes to the draft DCO (if required). This is a further item for our

members to take on board and prepare responses. On the 4th December several days of Hearings commence for the Cottam Solar Project, potentially finishing on the 7th December. During this week on the 5th December the ExA for the West Burton Project will publish the itinerary for the Accompanied Site Visits (if required). The next week commencing the 11th December, Issue Specific Hearings, Open Floor Hearings and Compulsory Acquisition Hearings and Accompanied Site Visits will occur for the West Burton Project. This timetabling means these two projects run across one another and directly before and after one another. This is not manageable for Interested Parties. The 19th December sees the occurrence of Deadline 3 for the Cottam Solar Project, with further comments, summaries and information required by this date. Therefore, three of the four weeks of December 2023 are timetabled by The Planning Inspectorate for the three projects. As yet this does not include any details of the Tillbridge Project which may also occur during this time.

- Sixthly, directly after the Christmas break on the 4th January 2024, two deadlines share the same date. The Gate Burton Project, has Deadline 7 listed on this day and the West Burton Project, has Deadline 3 timetabled on the same day. In reality, this means Interested Parties will need to work on their submissions for these projects over the Christmas break, following continuous months of endless deadlines and events.

There are a further two deadlines in January 2024. Deadline 4 for the West Burton Project on the 18th January and Deadline 4 for the Cottam Solar Project on the 30th January. With ExA's second written questions for the Cottam Solar Project on the 16th January and the ExA's second written questions for the West Burton Project on the 23rd January.

- Seventhly, there are two Deadlines (5) within one week of each other, namely the 22nd February for the West Burton Project and the 27th February for the Cottam Solar Project. Again, there are requirements for comments and information for both projects. The following week sees a further two Deadlines (6) during the same week (5th March for the Cottam Solar Project and the 7th March for the West Burton Solar Project). These deadlines require the summary statements from parties plus comments and other information. The close of these two Examinations occurs on these two dates respectively.
- All the above examples clearly show the different Examinations do not provide adequate time between deadlines for Residents and Interested Parties to give an evidenced response.
- ExA's state that the written processes will be the principle means used by the ExA to gather information, evidence, and views about the application. It is therefore imperative that reasonable time is available to meet these requirements.

From our perspective, with the unreasonably close, overlapping and clashing timetables for these projects, our members can only draw the conclusion that in reality they are excluded from the processes. If it becomes so impossible for Interested Parties to meet these deadlines, then in effect that is exactly what is happening.

- An item which has not been included in this appraisal of the timetables for these projects is the Written Representations for the West Burton Project. This submission of information has not been itemised in Annex E of the West Burton Project, Planning Inspectorate's Rule 6 letter dated the 10th August 2023.

This means that further submissions are required by Interested Parties which have not been cited and so once this item is included in the ExA timetable for the West Burton Project further potential clashes with other events may accrue.

- For Interested Parties and residents to be part of these Examinations, it is necessary for the draft timelines to be amended to give more time between deadlines and requirements to assist IP's in making their submissions. We have heard many residents say that 'it's all a done deal'. We believe the overlapping, clashes and little time between these draft Examination timetables only corroborates this viewpoint.
 - Lastly, most residents do not have the experience or expertise in these types of projects. The process, terminology and timetable are tailored for professionals within this line of work or realm of understanding. Residents and the general public need more time to understand and discuss the requirements with other interested parties so that they can then make their personal submissions.
- Agenda Item 6

Any other matters

- The Lincolnshire Showground has been specified for the venue for this initial event. Whilst we appreciate a local venue being allocated, the details are vague. There are several conference facilities at the Showground, so more details will be required.
- Please also note that traffic volume going to and from the Lincolnshire Showground and conference centres may be an issue via the main entrance off the A15 (Ermine Street) throughout

October, November, December 2023 and February 2024. Please see the calendar of events for specific details.

- Also, in recent weeks it has become evident that The Planning Inspectorate is going through a process of structural and procedural change with the move from 'Project Speed' to the introduction of the 'Early Adopters Programme' and staff reassignments and movements from one project to another. These structural changes are very difficult for Interested Parties to grasp along with the major implications and impacts of the proposed projects for the West Lindsey District.

Interested parties need to feel reassured that these new procedures and changes within The Planning Inspectorate coupled with the growing number and influx of Nationally Significant Infrastructure Project's, will not detrimentally affect the Inspectorate's ability to examine and make recommendations for the current schemes to the Secretary of State.

Signed J Allan

On behalf of 7000 Acres

www.7000acres.co.uk