

IP : 20038528

WEST BURTON SOLAR - OPEN FLOOR HEARING WEDNESDAY, 8TH NOVEMBER 2023 DOUBLETREE HILTON, LINCOLN. (RESUMED FROM THURSDAY, 7TH SEPTEMBER 2023)

ORAL SUBMISSION SUMMARY

I concur fully with Interested Parties (IPs) in attendance at the Open Floor Hearing who spoke so compellingly against the West Burton Solar Project and cumulative effects of Gate Burton, Cottam Solar and Tillbridge Solar projects. I fully support the relevant representations submitted by IPs to the Examining Authority, including 7000 Acres and Mr Roger Jones who oppose this solar scheme and believe the statements they have made are factual and honest. I strongly object to West Burton 1, 2 and 3.

I had referenced the difficulties in navigating the Examination documents and complexities of the Planning Inspectorate's process in respect of all four solar projects amounting to 10,000 acres.

The initial Consultation process with the Applicant has been left not just wanting but a cause for concern when my feedback in respect of the substantial changes and further proposals to West Burton 3 were were not only ignored but not taken into account.

1. Island Green Power announced, a considerable time after their Consultation period on their **West Burton 1, 2, 3 & 4 and Cottam Solar 1, 2 & 3** Schemes concluded in June 2022, that they were withdrawing from their West Burton 4 scheme in Nottinghamshire as the land was now identified as Grade 3/3A and above. **WHY** did it take so long for us to learn of this soil grading change from what was previously mostly, we were told, graded as 3b? Surely it is judicious that such soil grading is conducted at an early stage before a scheme on this scale is put to the public for consultation ?

In November 2022, *five months* after the conclusion of Island Green Power's public consultations, I received a letter consulting on further proposals and changes for **West Burton 3** asking for feedback. These proposals, in their words, included the *introduction* of certain infrastructure. The substation and the increased extremely hazardous energy storage infrastructure (BESS batteries), previously proposed within the West Burton Substation site area to the northwest of West Burton Power Station ie the former West Burton 4 site, is to be moved to West Burton 3. The changes in fact are substantial to the **West Burton 3** scheme and are not what was originally consulted upon with the public and therefore required a much wider and fuller public consultation. There are people in the area who have no knowledge of these changes let alone the scale of them nor the hazards from the BESS batteries. They include moving the sub-station within WB3 site boundary from a compound area of 0.6 hectares (1 ½ acres) to an area of 1.8 hectares (4 acres) almost tripling the compound area but also doubling in height the substation busbars from 6.5m to 13.2 meters. The substation has increased from 132 kilovolt to 400 kilovolt, again tripling the capacity.

WHY can it not remain within the original proposed location of West Burton 4 Substation site area ?

WHY did the letter I receive in November have limited circulation ? There has been a lack of transparency and inadequate consultation.

West Burton 3 commences on the outskirts of Sturton by Stow towards Stow Park and Stow arriving at Marton village around 3 miles away and almost adjoins Brampton and Torksey villages. The compound will be hugely visible for miles to everyone travelling the exceptionally busy arterial A1500 in both directions as the solar panels will abutt almost the entire length of the roadside between

Sturton by Stow and Marton village. The 400 kilovolt substation hasn't moved far on the plan from where the 132 kilovolt substation was to be sited and is incredibly close to Marton village Primary School and residential properties. Added to this the proposed Gate Burton Solar project of 1690 + acres a short distance away from Marton and Stow Park Solar, from Luminous Energy who is proposing a 35MW solar farm in the same location as West Burton 3.

2. I was concerned there may be other people like me who had responded by email whose consultation feedback was not received into the West Burton mailbox and the senders were not aware of this issue. This together with the lack of consultation documentation and information distributed to the public in November 2022 can completely skew the percentage of respondents that West Burton use in their evidence documentation to the Planning Inspectorate and give the impression that people have no comments on the very substantial changes to West Burton 3, to which I objected.
3. I have the email audit trail and tracked messages and can submit these to the Planning Inspectorate following this Hearing, if required.

It is fundamental and hugely important that the Consultation mechanism works correctly, and accurately so that people can engage and not be disadvantaged as I most definitely have been in this instance.

West Burton 1, 2 and 3 and Cottam 1, 2 and 3, are both Island Green Power schemes amount to 5,532 acres.

The boundary of a section of **West Burton 2** on the outskirts of Sturton by Stow between Bransby/Ingleby and Saxilby indicate the Solar panels, hardware, cameras and security fencing will be directly alongside the B1241 on both sides of this very busy road which brings into question safety for road users from the risk of a lack of clear visibility from 4.5m solar panels and glint and glare as there are several blind spot bends on this route. Hedges are very low and sparse on particular sections of this road and in some parts there are no hedges at all providing good visibility all year round for traffic.

The Lincoln Cliff Jurassic Escarpment and heritage aspects of the City of Lincoln, especially Lincoln Cathedral can unmistakably be seen and appreciated in the distance by all who travel this busy route. The wonderful expanse of the Area of Great Landscape Value (AGLV) can be seen from the B1398 on Lincoln Cliff. **West Burton 2** solar will be highly visible on this landscape from Lincoln Cliff with total obliteration of the Jurassic Cliff views from B1398, notwithstanding the Cottam Solar project a short distance away.

Saxilby and the 30 villages affected by the four solar schemes totalling 10,000 acres are Lincolnshire's countryside, they are visitor destinations – they provide holiday lodges, b&Bs, fishing holiday parks and activities and many shops. The Fosdyke Canal in Saxilby brings in visitors all year round. There is history in abundance in and around these villages and tourism is an important part of Lincolnshire's economy along with agriculture.

West Burton 2 on the Western side of the B1241 will be highly visible to residents of Saxilby village notwithstanding the proximity of West Burton 1. Many new homes have been built on the outskirts of Saxilby particularly over the last two years – **were these residents consulted ?**

I have witnessed flooding of my village time and again and there is much photographic evidence to confirm this dating back 100 years.

West Burton 2 has the River Till on its boundary between the villages of Bransby and Broxholme on the Eastern side of the B1241 travelling between Sturton by Stow, Ingleby and onto Saxilby. There is historic flooding in this area. Following a month's worth of rainfall in 24 hours on 20th October 2023 the River Till burst its banks with far reaching flooding across farmland with several roads to surrounding villages impassible. There is photographic evidence of the extent of this current episode of flooding over this land, including images of Lincoln City, again under a significant amount of flood water as it was in 2019. Images of the flooded fields, the villages affected and the City are also available.

Bransby Horses Home was severely affected when a number of fields belonging to the charity were under flood water in November 2019. They had to move 100 of the 450 animals to an alternative site, a number of planned fundraising events were cancelled and they suffered losses of about £200,000. The flood water rendered these field unable to support grazing for the horses. Sadly, Bransby Horses Home again suffered from extensive flooding of their grazing fields two weeks ago.

- a) I have significant concern at the rate at which surface water runoff during heavy or persistent rainfall will occur from millions of 4.5 metre high solar panels as it enters the land drains leading to the River Till from Island Green Powers **West Burton 2** around Bransby / Broxholme but also **Cottam 1 Solar** which has the River Till running through the centre of that scheme as both these areas are flood plains. Add in the hard stranding of the access roads and any concrete supports for the solar panels the ground will be unable to absorb to such excess.
- b) What measures has Island Green Power put in place to prevent even greater flooding of the farmland on both sites from the solar panel run off which will lead to local flooding of roads which then become impassible, particularly as they have denied to local people who know about the flooding that there has never been any flooding of these areas of land ?
- c) In flood prone areas such as **Cottam 1** and **West Burton 2** there is no amount of swales that could absorb/ capture rainwater runoff and redirect it. The River Till in flood will already be under considerable strain as will the dykes that feed into the River Till. As flood water finds a level the fields and roads around these two sites will be under a significant depth of floodwater.

Where will it be redirected to ?

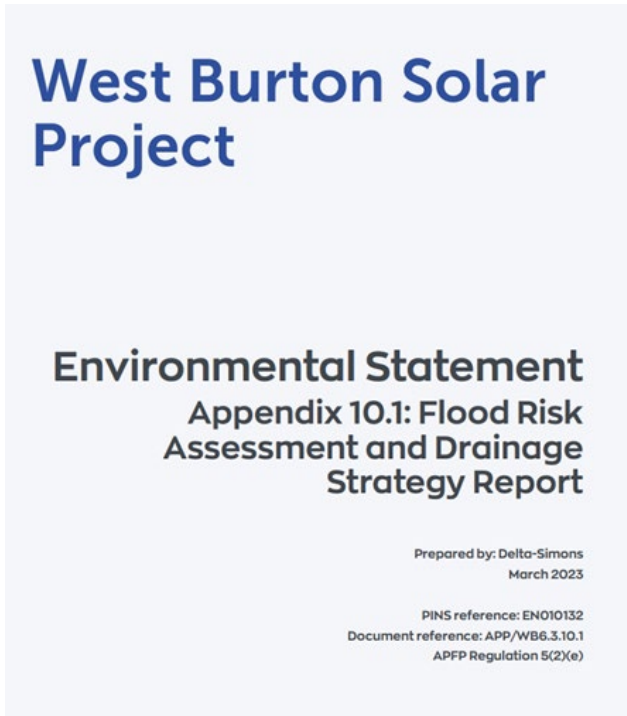
- d) What measures are in place with the Fire Service to deal with a BESS Fire when the land for these proposed solar farms is flooded, especially if the local Fire Service resources are depleted while dealing with flood matters elsewhere in the County ?

Where will the water be obtained from to cool such fires / thermal runaway in the event of flooding in the surrounding areas ?

- e) Bearing in mind the above what would be the environmental impact of a battery fire / thermal runaway under such floodwater conditions for example, how would dangerous toxins / chemicals contamination be prevented from seeping into the flood water and then into the wider water courses?

Point 3.0, Table 3 Summary of Risk states for West Burton 2 : The Risk from the site from all sources of flooding is Negligible to Low.

See Flood Map at Appendix



3.0 Assessment of Flood Risk

3.1.1 The aim of this report is to assess the potential flood risk to the Scheme, the impact of the proposed development on flood risk elsewhere, and the proposed measures which could be embedded to mitigate the identified risk.

3.1.2 Site specific assessments of Flood Risk have been provided in Appendices A - D

3.1.3 A summary of the assessed flood risk to the Sites is provided in Table 3 below:

Table 3: Summary of Flood Risk

Site	Summary of Flood Risk
Cable Route	The risk to the Site from all sources of flooding is Negligible to Low .
West Burton 1	The risk to the Site from all sources of flooding is Negligible to Low .
West Burton 2	The risk to the Site from all sources of flooding is Negligible to Low .
West Burton 3	The risk to the Site from all sources of flooding is Negligible to Low .

3.2 Embedded Mitigation

3.2.1 Where Site specific mitigation is required this is specified in the appendices.

3.2.2 In general the following mitigation measures have been embedded into the masterplanning process.

- 8m easements have been established around all watercourses, including Main Rivers and Ordinary Watercourses and 9 m from IDB assets.
- Where crossings of watercourses are required for the cable route, relevant permissions should be sought from the Environment Agency, Lead Local Flood Authority and/or the relevant Internal Drainage Board.
- Either fixed or tracker panels will be utilised throughout the Scheme.
- The minimum height of the lowest part of the fixed solar panel units will be 0.6 m above ground level. There is potential to increase the height of the lower part of the fixed panels by raising the lower end of the panel mounting frames creating a shallower angle, which could provide at least 0.6 m of freeboard above any flooding. The maximum specified height of the upper edge of the fixed panels will remain at 3.5 m above ground level.
- Fixed panels should be located within areas of the Scheme which are located in Flood Zone 1 or in areas where flood depths do not exceed 0.6 m.
- The tracker solar panel units will be mounted on raised frames (usually raised a minimum of 0.4 m) when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.3 m above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.3 m above ground level in the horizontal position.
- Tracker panels can be located in areas of the Scheme which are located in Flood Zone 1, 2 and 3 on the basis of the additional flood protection offered by their potential to be stowed horizontally.

4. The **West Burton scheme** indicates in the draft DCO the removal of 55 kilometers (35 miles) of hedgerows or more and trees and the same for Cottam Solar. **WHY?** This is vandalism and one can illustrate the episode of the landmark tree at Sycamore Gap as an example of what is proposed by Island Green Power.

It is folly to remove established 30+ year old hedges and replant with bare root whips that will take 15 years or more to establish in an attempt to disguise or mask millions of solar panels. Neither could it lessen our awareness of the whole scheme when driving, walking or cycling and generally just enjoying nature, the peace, the inner calm and feeling of freedom the countryside brings. Once the leaves have dropped from the native hedgerows the entire **West Burton 1, 2 and 3** scheme would still be a visible eyesore for half its lifetime. On the one hand we have the Government seeking to improve hedgerow protections with a Consultation launched in June 2023 to help meet commitment to support farmers to create or restore 45,000 miles of hedgerows by 2050 and on the other these four NSIP solar schemes removing them.

Hedgerows make an incredible contribution to halting biodiversity decline and tackling climate change. They are crucial for climate adaptation and storing carbon. Hedgerows are the very essence of our countryside, they are important boundary features, help to manage livestock, slow soil erosion and water run-off, and support crop pollinators for food production. They also provide vital resources for mammals, birds and other species. They act as wildlife corridors – allowing species to move between isolated habitats and can also harbour beneficial insects that predate crop pests, thereby supporting an integrated approach and they add to the beauty of our Lincolnshire countryside. The Climate Change Committee identified hedgerows as a vital force against climate change.

The communities of 30 villages will be affected, (including mine which will be completely surrounded and overwhelmed North, South, East and West for miles) whichever road I travel daily and also along the narrow, inter-twining country lanes between these villages. It is unimaginable having to consider living with this level of industrialisation of 10,000 acres of countryside for 365 days of the year for up to 60 years. No escape, encircled, imprisoned by four solar projects of this enormity a few miles from each other with all the horrendous hardware, whichever direction we look as **West Burton, Cottam and Gate Burton** are going through the examination process now and **Tillbridge** solar soon to follow.

Notwithstanding any of the aforementioned there is loss of food and crop production when there is food scarcity both Nationally and globally, loss of amenity, cultural heritage impact and impact on tourism, effects on the economy including jobs and those businesses associated with agriculture and much more. Agriculture plays a highly significant role in the local economy by way of direct employment and product sale in Lincolnshire. These proposed sites, if permitted, would employ minimal staff once set up and would not directly support the economy of the area.

I have concerns over the amount of housing and rental accommodation that would be taken up by the construction workforce. Not just for one of the schemes but if all four schemes were to progress at similar times and how this would affect the availability of housing stock (purchase or rental) for local people and the wider residents of the area. We know there is a shortage of rental properties nationwide.

No-one has ever lived with solar long term where they are surrounded with 7,000,000 panels, security fencing, CCTV, dangerous BESS batteries the size of shipping containers, sub stations and associated paraphernalia in a populated area – what do we really know of such EMF effects or other effects on people and wildlife on this scale. How can any of you here today be absolutely certain we will not be harmed ?

Solar farms on the immense scale of these four projects combined are away from populated areas in other parts of the world. Many are in deserts – Bhadla Solar Park in India - the largest solar park in the world in 2023 covers an area in the region of 56 square kilometres (13,838 acres) is in a remote arid sandy area of Rajasthan, almost inhospitable for human habitation. This would place us in the top 3 or 4 in the world. India is a huge subcontinent compared to the United Kingdom, yet in a race to net zero we are proposing to use 10,000 acres of our finite land.

We are a tiny island by comparison -. There are eleven NSIP solar schemes coming forward for examination in Lincolnshire all on agricultural land taking thousands and thousands of acres out of farming.

With the right initiatives from the government, we can turn the rooftops of warehouses and car parks across the country into clean power stations, cutting carbon emissions, slashing energy bills, and protecting our countryside. A government target to ensure that a significant portion of newly generated solar power comes from rooftops will be critical to generating power closer to people's homes and businesses, which is also a key way to ensuring the transition to net-zero is more local thus avoiding large swathes of the UK's countryside being used for ground-mounted solar. **West Burton, Cottam, Gate Burton and Tillbridge Solar** will cover an area the size of the City of Lincoln and beyond.

It is vital that the government supports a national rooftop solar target - ensuring that at least 60% of the national target of 70GW of solar by 2035 (as recommended by the Net Zero Review) is delivered

through the lowest cost opportunities for rooftop solar installations, on new build homes, commercial buildings and car parks.

What I and others know is **West Burton 1, 2 and 3** and the further three projects, are causing mental anguish, stress and in turn physical harm to residents in these affected communities already.

I OBJECT TO THESE SOLAR SCHEMES

P Mitchell

November 2023
