

## **7000 Acres Summary of Oral Submissions**

### **Issue Specific Hearing 3**

### **Deadline Four**

**February 2024**

## Introduction

This is the summary of oral submissions by 7000 Acres, and our comments on oral submissions made by other parties

### Agenda Item 3

#### a. Implications of the revisions to National Policy Statements for the assessment of the Project.

The Applicant [00:33:50:05 - 00:34:25:06] noted the NPS were now designated, 7000Acres accepts this point. However, in the opinion of 7000Acres the Applicant does not take account of the entirety of the Planning Framework, Policies and clear Ministerial intent but merely selectively quotes from the NPS.

#### NPS Framework Overall:

Within the 2024 NPS EN-1, Section 1.6 clarifies the arrangements for handling the transition between the 2011 suite and the suite due to come into force in 2024. Section 1.6 states that *“for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect”*.

The 2011 documents make virtually no reference to solar. Within EN-1 (2011), the Overarching Policy envisages large scale renewable energy generation from wind (offshore / onshore), Biomass, EfW, Wave and Tidal, citing the UK’s abundant national resources in these areas – notably, this does not include solar. Solar is only mentioned once, to highlight the need for back-up capacity to manage intermittent generation.

With regard to land use, the 2011 NPS EN-1 (5.10.8) requires that Applicants *“should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations”*.

The 2011 NPS EN-1 also advises that the Inspector should give little weight to the loss of poor quality land (including 3b), *“except... in areas... where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.”* Notwithstanding the unusually high proportion of land that has been assessed by the Applicant as 3b, it is clear that within the area of West Lindsey in which the West Burton Solar Project is proposed, there is a demonstrable link between agriculture, the environment and the local economy, therefore the exception should apply.

Within NPS EN-3, National Policy Statement for Renewable Energy Infrastructure, solar is not mentioned in 82 pages of guidance, whereas, onshore wind, offshore wind, biomass, waste combustion, wave and tidal are all covered.

### **Critical National Priority**

Following consultation feedback, the 2024 NPS has evolved the definition of *“a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure”*, where low carbon infrastructure is defined as *“for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion...”*. This is an evolution of the dNPS (March 2023), which defined the CNP only *“for the provision of nationally significant new offshore wind infrastructure (and supporting onshore and offshore network infrastructure)”*.

This very recent change, following a very close margin of feedback (with 35 in agreement with the March proposed draft definition of CNP, and 39 in disagreement). It is worth noting that this is from a total of 157 responses, 61 of which were from the categories *“Business / Trade Association”* or *“Commercial Organisation”*. Many of the names of these organisations are redacted from the consultation feedback report, but of the named respondents, many were bodies with interests in solar development, e.g. Solar Energy UK, Eden Renewables, EDF and Scottish Power Renewables.

The result of this is that there is no particular emphasis within the NPS on any one technology over another, even though it is a matter of fact that not all technologies are able to contribute to decarbonisation in equal measure. For instance, wind is foreseen by

National Grid to produce over 70% of the UK's electricity by 2050, which is presumably why it was singled out in the original definition of CNP in the March 2023 draft NPS. By contrast, solar will deliver an order of magnitude less than wind, at around 7%, even with up to 90GW of deployed capacity.

The result is that the definition of CNP is rendered effectively meaningless within the NPS, as there is no differentiation between technologies, despite their differing contributions.

Although the NPS equates such diverse contributors as offshore wind, solar, wave and geothermal, in weighing impacts and benefits, the Secretary of State is directed to *“take into account its potential benefits including its contribution to meeting the need for energy infrastructure”*. This allows the SoS to consider the contribution such technologies can make.

### **Beyond “Need” in the 2024 NPS suite**

The Applicant highlighted section 3.2 of the 2024 NPS EN-1, where the *“Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS”*.

Indeed, the concept of *“need”* is rendered meaningless following the debacle over *“critical national priority”* – if such diverse contributors as Offshore Wind, Solar and Geothermal can be classed equally, and therefore can contribute little in this regard to the examination process. Fortunately, the 2024 NPS EN-1 also provides plenty of more useful guidance for decision making in this case.

As described above, the Secretary of State is able to consider the functional contribution a proposed development may make. In addition to this, *“Good design”* includes how infrastructure *“relates to the landscape it sits within”* and that *“applying good design to energy projects should produce sustainable infrastructure sensitive to place, including... efficient in the use of natural resources, including land-use”*. The scale of the West Burton project and height of panels, in comparison to the local landscape and villages, demonstrates a design that lacks sensitivity to place.

Allied to land use, is the subject of the use of agricultural land. The NPS states “*Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*” (this principle of a “hierarchy” of preferred land use is further expanded in emerging NPS EN-3). In the case of West Burton, the Applicant has focused entirely on the quality of agricultural land, not demonstrated a necessity to use agricultural land.

Also, within “*Good Design*”, the NPS notes the importance of “*the functionality of an object – including fitness for purpose and sustainability*”. Section 2 of 7000Acres WR REP1A-026 (“*The role of Solar in Energy Provision and Decarbonisation*”) describes the constraints around the functional contribution solar can make to energy and decarbonisation, which are limited to the point where the benefits do not outweigh the harms arising from ground mounted solar installation at such a large scale.

From the NPS, in decision-making, the Secretary of State “*should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape*”.

With regard to alternatives the NPS states that the “*decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law*”. The NPS recommends that the “*Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development*”.

In the case of West Burton, the Applicant has created an extremely narrow envelope of alternatives, starting with grid connection access, then has sought to secure a sufficient volume of land to maximise use of the grid connection. On that basis, the discussion of alternative sites by the applicant is superficial, in that rooftop solutions, or use of brownfield sites were never genuine considerations. On the other hand, in order to decarbonise effectively, even without retrofitting solar to existing rooftops, the capacity of West Burton could be deployed each year by making use of new-build domestic rooftops, thereby

providing a much more rapid deployment of the same capacity, with fewer adverse impacts than the West Burton scheme. The NPS also describes the impacts on landscape, stating that effects “*arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development*”, noting that “*the scale of energy projects means that they will often be visible across a very wide area*”. The Secretary of State should judge “*whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*”. The combination of the colossal scale of ground mounted solar projects such as West Burton as well as the height of panels, is not sensitive to the landscape.

### **Scale of Solar within 2024 NPS EN-3**

At ISH 3, the Applicant attempted to portray that the wording of NPS EN-3 indicated an example of a scheme that meets the minimum threshold requirements for an NSIP-scale project. When the point was raised by the ExA and 7000Acres about the use of the word “*typical*”, the Applicant concentrated on this point of “*minimum threshold example*”, or that the example was of a “*typical 50MW scheme*”. It is clear NPS EN-3 provides this as an illustration, and while it is understandable that there will be variability in the size, deployment of 500MW, perhaps overplanted to 700-800MW is a vastly different proposition than that indicated within the NPS, perhaps by up to 15 times the scale of a “*typical*” scheme in EN-3.

### **Use of BMV Land**

The Applicant does not seem to be aware of the recent update to the NPPF, including footnote 62. The Applicant conveniently ignores the need to avoid using BMV land shown in EN-3, paragraphs 2.10.29, 2.10.30 and 2.10.145. The principle of avoiding BMV land has been upheld in the High Court -

<https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.html> Importantly, the High Court case confirmed that the Written Ministerial Statement of March 25<sup>th</sup> 2015 remains extant and relevant, contrary to the Claimant’s argument that recent amendments to ‘net zero’ target and delivery budgets had reshaped the policy framework for renewable energy. To avoid repetition, we have made our detailed comments on this point under Item 6.b.

**b. Implications of technological improvements for electricity generated, scheme design and environmental impacts.**

The Applicants Statement of Need *“expresses agreement with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure”*.

The Applicant has frequently recycled this statement, to imply agreement with the Government that there is a need for large-scale solar in favour of decentralised alternatives, without acknowledging that functionally, there is equivalence between a 500MW capacity ground-mounted solar farm and 125,000 households with a 4kW solar rooftop installation. It is this fact that has enabled Germany to install 70% of the 80GW of solar installed in the country, on domestic and commercial rooftops.

7000Acres agree that, in more general terms, large-scale infrastructure will still be required for many aspects of the electricity system that cannot be disaggregated to the same extent as solar, e.g. for offshore wind, nuclear assets and electricity networks.

Section 3.3 of document WB7.11 Statement of Need [APP-320] specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that *“a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”*. This support for large scale solar as part of the ‘answer’ to net zero and energy security has been repeated in its Powering Up Britain published in March 2023.

It is worth scrutinising the elements that comprise the Applicant’s statement:

1. *“the Government’s view that large capacities of low-carbon generation will be required to meet increased demand”*

While large capacities of low-carbon generation will be required, this must not be directly equated to mean this must be delivered through large capacity installations, i.e. that the capacity cannot be delivered through aggregation from smaller installations.

2. *“a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.*

This statement is taken directly from the NPS, but it is a very loose phrase that fails to consider that wind and solar will make contributions at very different scales. Wind is expected to produce c. 70% of the UK’s electricity by 2050, and therefore the system at that time is likely to be predominantly composed of wind alone. Solar will provide only c. 7%, even in scenarios of 90GW of installed solar capacity<sup>1</sup>. The Applicant has used these words to convince the Examining Authority that *“wind and solar”* together will provide the predominant supply, glossing over the very minor role that solar will play, and by implication, their scheme, will make.

This support for large scale solar as part of the ‘answer’ to net zero and energy security has been repeated in its Powering Up Britain published in March 2023.”

The Applicant has been selective with the text chosen from Powering Up Britain, omitting that the same sentence continues to state that the Government is *“looking for development mainly on brownfield, industrial and low/medium grade agricultural land”*. Not only has the Applicant failed to make use of any brownfield or industrial land, but they have also failed to justify the need to consume farmland, as is required by the NPS. The Applicant has chosen not to mention that the same paragraph reinforces the Government’s need for rooftop solar, and that the Government has accepted *“the recommendation from the Independent Review of Net Zero to set up a taskforce to deliver on this ambition”*, i.e. to co-ordinate the effective and efficient delivery of the 70GW solar ambition in the UK. Once again, the Applicant’s answers are shown to be partial, and therefore cannot be relied upon as evidence in this examination.

**c. Consideration of the nature and purpose of the community benefits package.**

**Community Impacts**

7000Acres made the point that Community benefits were a prominent part of the initial communications by the Applicant, in brochures and display stands. Since then, the idea of

---

<sup>1</sup> [FES 2023 Data Workbook V003.xlsx \(live.com\)](#)



community benefits has barely featured in the course of the examination or in the vast body of material produced by the Applicant .

As Fillingham Parish Meeting, for instance, we have not been approached and we are not aware of anything that has been put to the community. In reality, the more that people have found out about the scale, size, dimensions and impacts, the more it is felt that no community benefit scheme could ever compensate for living adjacent to large areas of 4.5m high panels that could never realistically be mitigated with hedgerows.

The idea of a community benefit scheme is considered by many to be nothing more than an inadequate fig leaf.

#### **Agenda Item 4**

##### **a. Failure rate of Photo Voltaic (PV) panels, and the impact on replacement, and consideration in climate change analysis.**

There are 2 issues to consider, the physical life of the solar panels and the economic life of the solar panels.

Firstly the physical life. The Applicant has claimed a solar PV panel failure rate of 0.4% per annum, which means that 24% will fail and need replacing over the 60-year life of the scheme and potentially 60% of the panels will last 100 years. The Applicant has not presented any evidence for this low failure rate and anticipated life of the panels. Equipment failure rates do not tend to be linear but follow a “bathtub curve”, with a relatively high rate at the start of the project due to manufacturing faults, damage during transport and installation errors. The initial failure rate will decline for a few years and then increase again at an accelerating rate. Assuming a very low and linear failure rate is not a reasonable worse case assumption.

Secondly the economic replacement rate. The energy generating capability of solar PV panels typically degrade by 1% per annum. Taking this latter point into account, after 60 years the remaining panels will only be producing 40% of their initial output. Current

industry evidence suggests that an economic life of a solar PV panel is 20 years, which takes into account the failure rate, degradation in energy generation and new technology becoming available. Using this reasonable worst-case assumption, the solar PV panels would be replaced twice (at 20 years and 40 years) during the life of the scheme. The Applicant's Chapter 7 takes no account of replacing the solar panels, except for when they fail. The Applicant's Review of Likely Significant Effects at 60 Years (EX1/WBB 2.3) states that extending the life of the scheme from 40 to 60 years will have no additional impacts, i.e. there is no intention to replace the panels on economic grounds, merely failed units.

Either the Applicant will replace the solar PV panels, based on their economic life, to maintain the energy generation of the scheme, or they will only replace panels that have failed. In the former case, the current Chapter 7 and Review of Likely Significant Effects at 60 Years are incorrect and misleading. In the latter case, the total energy generation of the scheme over its life is much less than claimed and so the Applicant's Chapter 7.8.61 claiming *"a total energy generation figure of around 21,956,988 MWh over the estimated 40-year assessed lifetime"* is incorrect and misleading. The Applicant's overall documentation is inconsistent and misleading; either they will maintain the generating capacity of the scheme, in which case their GHG and transport assessments are incorrect, or they will only replace failed units, in which case their electrical generating claims are wrong. This is another example of where the Applicant has not followed Advice Notice Nine and submitted inconsistent documentation that does not use reasonable worst-case assumptions.

Miss Broderick for the Applicant stated at 00:41:32:28 - 00:42:13:10 *"obviously any operator of a generating station will want to make sure it is operating as efficiently as possible and generating as much energy as it can."* This statement implies that panels will be replaced more frequently to ensure the scheme is *"operating as efficiently as possible"*.

The current definition of "maintain" in the dDCO is vague and wide ranging, giving the Applicant/Operator carte blanche to change panels at will.

**b. Consideration of PV Panels and associated infrastructure at macro scale - Ground mounted and rooftop PV, provenance, size.**

ExA's Question *"During the written questions. The first set of written questions. There was a question in there about the existence of anything of comparable sized panels around about the 4.5m. And the response was that I suppose really the question is if a member of the community wants to go and see what one of these solar farms look like with four meter high panels, where could they go? The answer was that there are some consented schemes within the UK, but my understanding is that there isn't anything comparable at this point in time, certainly in the UK."*

7000Acres: There are currently no examples of 4.5m high panels in the UK. There are examples abroad, such as the Xlinks scheme in Morocco that will use 4.5m high sun tracking panels<sup>2</sup>. This scheme will be connected to the UK by a 3,800km sub-sea cable. It will provide 11.5GW of renewable energy to the UK, typically providing 3.6GW of reliable energy for an average of 19 hours a day. In summer, the Xlinks solar panels will generate three times as much as equivalent panels in the UK and five times as much during the winter months. In total, the scheme will provide circa 8% of Britain's energy needs and so greatly reduces the need to cover productive UK farmland with inefficient solar panels. The UK has a 70GW (peak) goal for solar power. At an average yield of 11%, this would provide an average of 7.7GW of electricity. The UK already has 16GW of solar power, providing an average of 1.76GW. Adding the Xlinks capacity to the current capacity will result in 5.36GW (3.6GW from Xlinks and 1.76GW current capacity) or 70% of the Governments required output from solar (11% of 70GW). Therefore, inefficient schemes, such as West Burton Solar are likely to be rendered obsolescent in a short period of time.

Xlinks has confirmed grid connections in 2029 and 2031, so in a similar timescale to the Lincolnshire solar NSIPs.

Solar NSIPs such as "Sunnica Energy Farm" use 2.5m high solar panels, as will the local (35 MW) Stow Park solar scheme: these and other schemes have clearly followed best practice and attempted to mitigate the visual impact of their panels. The Applicant has not explained

---

<sup>2</sup> <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010164>

why it needs the unprecedented 4.5m high solar panels and why it has not followed good practice by minimising the impact of their scheme.

**c. BESS Management and Safety, noting revisions to Outline Battery Storage Safety Management Plan (OBSSMP)**

Firstly, EN-1 explicitly excludes all forms of electrical storage from the NSIP process, except for pumped hydro. 7000Acres has made the case that a BESS will be the primary, or only, source of income for the majority of the year. Therefore, it provides an additional income and so should not be considered as Associated Development.

7000Acres is pleased to see the Applicant's Outline Battery Storage Safety Management Scheme Revision A now takes account of thermal runaways, as the previous version was deficient.

7000Acres retains concerns over the fire water provisions secured in the dDCO. The Applicant has changed from assessing a current (LeClanche – paragraph 1.1.7) to a hypothetical future system and so is not applying a reasonable worst-case assessment. The Applicant's specialist, Mr Gregory, appeared to imply that 2 hours of water held on site would be sufficient for future battery systems. This is not borne out by evidence from recent BESS events, where thermal runaways required cooling for many hours<sup>34</sup>. Mr Gregory then confirmed at 01:34:57:20 - 01:35:36:00 that *“so normally, a 2.5MW hour container, you know, probably would have burnt out sort of in, in sort of 12 hours.”*

As the Applicant's specialist confirmed that it is foreseeable that a thermal runaway will last for circa 12 hours, the 2 hours of water supplies secured in the dDCO, and the lack of local main drains and hydrants is clearly insufficient for a foreseeable thermal runaway. Sufficient

---

<sup>3</sup> 7000Acres Deadline 1A WR on Battery Energy Storage System Safety Concerns

<sup>4</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-003998-DL2%20-%20Edmund%20Fordham%20EF11.pdf>

water supplies, appropriate bunding and storage of fire water must be secured in the dDCO and associated Works No.2.

## Agenda Item 6

### Soils & Agriculture, Biodiversity & Ecology, Water Environment

#### a. Soil resource impact of change from 40 to 60-year project life.

At 00:18:50:02 - 00:19:29:27 the Applicant's specialist, confirmed that extending the life of the scheme from 40 to 60 years would have no additional benefit to the soil health: *"The increase in soil organic matter at 60 years, therefore may be only marginally better than that achieved at 40 years. All soils will differ in the rate of recovery. As a rule of thumb, we'd normally say that for a change of management, you would need about a 10 to 15 year period to notice a signal in terms of soil organic matter over the noise of soil organic matter."*

The Applicant claimed that the land would remain farming land as sheep could graze it. Sheep farming is not a current feature of this region and is unlikely to be economically viable due to the current price of wool and lamb meat. As sheep grazing is not secured, a reasonable worst case is that the land will be covered in rough grassland and invasive weeds.

Photographs of sheep are often shown in photographs by solar developers but very rarely used in practice:

Penpergwm Solar Farm in Monmouthshire:



“Sheeps” in front of solar panels, Germany stock photo



These are very well travelled as they are also in Long Island, New York:



“

This report shows that in scaling up solar, we don't have to choose between one 'green' good—clean energy—and another—undisturbed forests, open spaces, and farmland...[W]ith the right approach, we have room for it all.

JESSICA PRICE

New York Renewable Energy Strategy Lead

<https://www.nature.org/en-us/about-us/where-we-work/united-states/new-york/stories-in-new-york/long-island-solar-roadmap/>

And then travelled to Gloucestershire:

## Welcome

Renewable Connections is investigating the potential for up to 40MW solar energy farm in Maisemore, Gloucestershire. Once operational, the project would supply enough power for up to 9,358 homes, and make a valuable contribution towards tackling the climate emergency in Gloucestershire.

We welcome any feedback you wish to provide so please do get in touch.



7000Acres asked what chemicals will be used to clean the panels and what effect these chemicals will have on the soil health. The applicant was unable to respond and said that they would investigate and reply at the next submission, however they believed that the panels would be cleaned using water.

Investigations by 7000Acres would indicate that de-ionised water should be used and that if soiling remains on the panels after rinsing, repeat the cleaning procedure or if any soiling continues to prove stubborn, IPA (Isopropyl Alcohol) with a concentration of less than 10% may be used.

If this is the case then can the applicant confirm that the use of IPA will have no effect on the soil health?

**b. Implications of the National Planning Policy Framework (NPPF) December 2023 update reference to agricultural land.**

7000Acres strongly disagrees with the Applicant who stated at 00:30:59:23 - 00:31:37:18 that the footnote to NPPF footnote 62 does not apply to this scheme. Footnote 62, states *“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.”*

This statement is consistent with other documents and Ministerial Statements<sup>5</sup>. For example, the Letter from the Chief Planner<sup>6</sup> that accompanied the issue of the updated NPPF, in December 2023, stated:

---

<sup>5</sup> <https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488>

<sup>6</sup> [https://assets.publishing.service.gov.uk/media/65845c1623b70a000d234df8/11\\_Chief\\_Planners\\_Newsletter\\_Dec\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65845c1623b70a000d234df8/11_Chief_Planners_Newsletter_Dec_2023.pdf)

*“A high-level description of the key changes is provided below, and was set out by the Levelling Up Secretary in his speech and accompanying WMS, but for the full detail and understanding of the policy please refer to the text of the NPPF itself. In headline terms, the new NPPF:*

- *gives greater protection to agricultural land through additional reference to the need to address food production, maintaining the emphasis on best and most versatile (BMV) land;”*

**As the update to the NPPF, and associated letter from the Chief Planner, were published in the same timeframe as the draft NPS, then it is clear that Footnote 62 is current planning policy and must be given due weight.** For the Applicant to state it does not apply is clearly wrong and not supported by any evidence.

A recent High Court judgement<sup>7</sup> upheld the point that use of BMV land needs to be justified by the most *“compelling evidence”*. The Applicant has repeatedly failed to provide compelling evidence why BMV land needs to be used for this scheme. Furthermore, it contradicts the argument that recent amendments to the NPS have reshaped the framework for renewable energy.

This principle is also consistent with the House of Commons Environmental Audit Committee Report<sup>8</sup>, 29 November 2023, paragraph 201 that states:

*“The Government should designate food security as a public good and incorporate food security and environmental goals more explicitly in the design of the Environmental Land Management schemes.”*

**c. Agricultural Land Classification Survey, food production and agricultural uses of land during operation.**

---

<sup>7</sup> Case No: AC-2023-LON-002550 – Lullington Solar Park Ltd and SoS For Levelling Up, Housing and Communities: hearing date 30 January 2024. Instructed by Pinsent Masons LLP

<sup>8</sup> <https://publications.parliament.uk/pa/cm5804/cmselect/cmenvaud/312/report.html>



One of the criteria that the Applicant keeps repeating to everyone is that the results of the ALC survey have a significant weighting. They have alluded to this again in agreeing that West Burton 4 was removed from the scope of this proposal, before the application was submitted, because of the results of the ALC survey for this proposed location. Another element of their proposal is the references that they keep making to the farm businesses and the benefits that they will receive from this development. We therefore wish to bring to everyone's attention the data manipulation that IGP have utilised in their application.

Farm Business A relates to West Burton 1. The ALC results that they have published for the location identify that the land comprises:

Grade 3a: 18.4Ha	20.2%
Grade 3b: 72.8Ha	79.8%
Total: 91.2Ha	BMV 20%

Farm Business B relates to West Burton 2. The ALC results that they have published for the location identify that the land comprises:-

Grade 2: 2.5Ha	0.7%
Grade 3a: 11.9Ha	3.4%
Grade 3b: 332.9Ha	95.9%
Total: 347.3Ha	BMV 4%

Farm Businesses C and D relates to West Burton 3. The ALC results that they have published for the location identify that the land comprises:-

Grade 1: 19.3Ha	5.0%
Grade 2: 6.6Ha	1.7%
Grade 3a: 148Ha	38.9%
Grade 3b: 205.5Ha	53.9%
Non-Agricultural 2Ha	0.5%
Total: 381.4Ha	BMV 46%

However if you split WB3 into Farm C and Farm D you get a different perspective on the results which become:

Farm Business C

Grade 1:	3.8%
Grade 2:	4.2%
Grade 3a:	58.7%
Grade 3b:	33.3%
	BMV 67%

Farm Business D

Grade 1:	17.2%
----------	-------

Grade 2:	7.7%
Grade 3a:	11.2%
Grade 3b:	63.9%
	BMV 36%

The Grade 1 and Grade 2 land included in Farm D could also be easily removed from this application as it is located in two fields to the very south of the proposed site.

As 7000Acres has demonstrated in Item 6.b, all BMV land must be removed from the scheme unless the Applicant can provide compelling evidence for its use.

#### **d. Biodiversity Net Gain**

7000Acres wishes to highlight the House of Commons Environmental Audit Committee Report, 29 November 2023, paragraph 31<sup>9</sup> that states:

*“It is also the case that many of the countries from which the UK imports food are climate-stressed, potentially jeopardising supply in the future. Furthermore, because UK food production tends to be relatively intensive in nature, any production offshored could triple or quadruple the biodiversity impact, as explained by Dr Elizabeth Boakes:*

***Every hectare of arable land that we convert to housing or something and then offshore the food production must be replaced by on average 2.9 hectares of land overseas, which will often be in tropical countries that will, therefore, have a much higher biodiversity impact, sometimes three to four times higher than in the UK.”***

When considering the Biodiversity Net Gain of this scheme, account must be taken of the impact of moving food production overseas and the adverse biodiversity impact. Unless the Applicant is claiming that the food produced on the scheme’s land does not need to be replaced, then (applying a reasonable worst case assessment) the biodiversity gains claimed by the Applicant should be divided by four to determine the true Biodiversity Net Gain.

---

<sup>9</sup> <https://committees.parliament.uk/publications/42481/documents/211176/default/>

**e. Consideration of the impact of the project on****(i) drainage and flooding**

At 01:17:26:23 - 01:17:57:15, Mr Rigby for the Applicant stated that the 4.5m high solar panels will not be solid unit but will have gaps allowing drainage. These gaps are not secured and so must be included in the Applicant's Concept Design Parameters and Principles. If suitable gaps are not secured, a reasonable worst case assumption is that in the future solar panels could be single units and therefore increase the risk of flooding.

The Applicant claimed that the installation and operation of solar panels will not affect the surface runoff. Mr Rigby at 01:17:57:17 - 01:18:30:25 stated: *"the available research that we have, which is the McEwen report, which is a US report, but it is the best that we've got, shows that panelled areas on grassed fields have a minimal impact on surface water runoff. In fact, I believe the wording is negligible"*.

7000Acres request the ExA takes account of recent research by the Welsh Government<sup>10</sup> and others<sup>11</sup> that installing large solar arrays on farmland results in deep soil compaction, increased water runoff and runoff from panels can lead to rivulets, which can lead to soil loss by erosion. It is requested that the Applicant takes account of this research, which is publicly available: the *"McEwen report"* cited by the Applicant is not *"the best that we've got"*.

---

<sup>10</sup> <https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-3.pdf>

<sup>11</sup>

[https://www.researchgate.net/publication/343578893\\_Effects\\_of\\_Revegetation\\_on\\_Soil\\_Physical\\_and\\_Chemical\\_Properties\\_in\\_Solar\\_Photovoltaic\\_Infrastructure](https://www.researchgate.net/publication/343578893_Effects_of_Revegetation_on_Soil_Physical_and_Chemical_Properties_in_Solar_Photovoltaic_Infrastructure)