

# West Burton Solar Project

## Summary of oral submissions made by Interested Parties at Open Floor Hearing 2 and the Applicant's Response

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## Contents

<b><u>1</u></b>	<b>INTRODUCTION</b>	<b>3</b>
1.1	BACKGROUND	3
1.2	PURPOSE OF THIS DOCUMENT	3
1.3	SUMMARY OF THE APPLICANT'S ORAL SUBMISSIONS AT OFH1	3

## Issue Sheet

Report Prepared for: West Burton Solar Project Ltd.  
Examination Deadline 4

### Summary of Oral submissions made by Interested Parties at Open Floor Hearing 2 and the Applicant's Response

**Prepared by:**

Name: Mollie Ogden

Title: EIA Coordinator

**Approved by:**

Name: Jane Crichton

Title: Associate Director MRTPI

Revision	Date	Prepared by:	Approved by:
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## **1 Introduction**

### **1.1 Background**

1.1.1 Open Floor Hearing 2 (OFH2) was held on 24 January 2024. The hearing provided an opportunity for registered Interested Parties (IPs) and other local people to make oral representations about the application. Each IP making an oral submission was requested to provide a written summary note to the ExA for Deadline 4 (28 February 2024).

1.1.2 The following people were present and made submissions at the OFH: Simon Skelton, James Allan on behalf of 7000 Acres, Andrew Johnson, Councillor Stephen Spence on behalf of Marton and Gate Burton Parish Council, William Rose, Victoria White, Margaret O'Grady and Sue Bingham.

### **1.2 Purpose of this Document**

1.2.1 This document sets out the Applicant's response to the comments made at the OFH. The comments have been grouped by the Applicant into topics where the matters raised are considered similar. Where the Applicant has made commitments on the topic, the relevant application documentation is identified.

1.2.2 This document also provides a written summary of the oral submissions made on behalf of the Applicant at OFH2 in the time allocated by the Examining Authority.

### **1.3 Summary of the Applicant's Oral Submissions at OFH1**

1.3.1 Gareth Phillips, Partner at Pinsent Masons LLP, on behalf of the Applicant acknowledged the time that parties have taken to attend the hearing and the open floor hearings for other solar DCO applications in the area.

1.3.2 Mr Phillips referred to the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects **[REP2-010]** which describes the interrelationships between the solar projects in the local area. He referred to the Shared Cable Route Corridor, where the projects have been designed to come together so as to limit land requirements and environmental effects in that area. He noted that each of the examining authorities for the different projects have the evidence before them of the other projects coming forward.

1.3.3 Mr Phillips noted that the Environmental Statement also includes a cumulative assessment which, by law, means that the decision must be taken in respect of this Scheme having regard to the other cumulative schemes. In addition, he noted that the application is not only scrutinised by the Examining Authority, but also the local planning authorities affected and the statutory nature conservation bodies, such as Natural England and others. He noted that these parties are experienced in looking at DCO applications and are able to provide the scrutiny that has been asked for by local residents. The views and opinions of these bodies count and will be had regard to when the DCO application is determined.

- 1.3.4 Mr Phillips noted that referring to these projects as “critical national priority” projects is not “developer-led”, as has been suggested. He referred to the designation in January 2024 of the suite of energy NPSs, describing these as being the very latest expressions of the government's policy for energy in the UK and which support the delivery of ground mounted solar. He noted that these NPSs have been the subject of two rounds of consultation and three iterations prior to being designated, their review having been first brought about through a judicial review. Mr Phillips refuted statements made about the influence of solar lobbyists on these NPSs, noting that the process of designation would have happened faster if they had had significant influence. He also referred to British Energy Security Strategy (2022), the Energy White Paper (2020) and Powering Up Britain (2023) as further evidence of government policy in support of solar. He noted that the policy support for solar is part of support for a mix of energy technologies, including wind and nuclear.
- 1.3.5 Mr Phillips noted that many of the points raised at the hearing concerned policy and process. He noted that the current process for the examination of the Scheme was introduced in 2008 and has been operating, with relevant policy evolving, since then. He noted that it is not the Applicant who has decided that large scale solar is the solution, but the government that has decided this policy. Accordingly, the Applicant is following the government's lead.
- 1.3.6 In response to comments made about land use for solar and his use of the analogy of golf courses at the previous Open Floor Hearing 1 on 8 November 2023, Mr Phillips noted he had made this comparison to put into context the amount of land that will be put to solar use if all 70GW of capacity set out in government policy were to come forward. He noted that it is not the case that agricultural land used for solar is in productive agricultural use all of the time, and referred to the provision of subsidies to farmers encouraging farmers to set land aside for other uses. A note on farming subsidies is provided in Appendix A to this document.
- 1.3.7 Mr Phillips noted that concerns about Chinese influence in supply chains are only being raised in relation to solar rather than other energy technologies, noting the historic funding of nuclear proposals in the UK by Chinese companies.
- 1.3.8 Mr Phillips noted that the Applicant firmly accepts that solar, both ground-mounted and rooftop, sits within a suite of technologies that are required to meet decarbonisation. Evidence to support this has been provided by independent bodies such as the Committee on Climate Change, the National Infrastructure Commission, and many others across Europe. The Applicant has a genuine concern about the environment and climate change and wants to make a significant contribution to decarbonisation. He further noted that, since privatisation in the 1980s, the energy market is driven by the private sector, which is true across all technologies rather than being specific to solar.

**Table 2.1: Concerns Raised by IPs and Applicant's Response**

ID	IP	Matter raised by IPs	Applicant's Response
<p><b>AL00 Alternatives and the reliability of solar</b> – <i>Concerns were raised about the reliability and generative capacity of solar, the effectiveness of solar in decarbonising the energy sector, and the preference for alternative energy generation technologies</i></p>			
AL-01	Ms White	<p>I have seen a report in countries such as California where the sun does shine a lot and these batteries have found it very difficult to absorb all of the solar power, store it safely and then distribute it efficiently. Therefore, there are still companies such as fossil fuels that are having to bridge the gap. Obviously we do not have as much sun, so perhaps the flow will be easier, but it will still not be efficient.</p>	<p>Please refer to the Applicant's responses to comment RE03 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b>.</p>
AL-02	Mr Skelton	<p>The use of a grid connection at the West Burton Power Station is a negative and restrictive move in the quest for more power and to decarbonise the UK. The UK could require four times as much power in the coming decades. When put into context, this solar scheme's electrical output is so small that it would be lost as a mere rounding up error within the enormous generation figures. The</p>	<p>Please refer to the Applicant's responses to comments RE04, and AL01 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b>.</p>

ID	IP	Matter raised by IPs	Applicant's Response
		<p>West Burton Solar Project would inefficiently use one of the four grid connections, utilising about 10% of its capacity. It is a waste of important national infrastructure at a time when generation levels need to increase at a rate never seen before. The scale and size of these behemoths being forced on our countryside is unjustified, unnecessary and there is certainly no urgency for a paltry 0.15% of electrical generation. Solar is such a low yielding and poor performer.</p>	
AL-03	James Allan, 7000 Acres	<p>There is a lot in the news about what the country must do to decarbonise, and the mounting pressure on National Grid to deliver the networks to enable offshore wind. You may have seen or heard of the Great Grid Update campaign from National Grid, explaining the need to connect offshore wind power to the UK. Offshore wind will provide 70% of the UK's electricity by 2050. It must therefore be connected to the cities across the country, and to do that we must lay high voltage overhead power lines across Lincolnshire, which would undoubtedly have environmental impacts, but would make a significant contribution to</p>	<p>The Applicant notes these comments.</p> <p>Submission AL-03 states that offshore wind "will provide 70% of the UK's electricity by 2050."</p> <p>The Applicant notes that the UK's legal requirement is to achieve net zero by 2050, and <b>7.11 Statement of Need [APP-320]</b> explains at Para 8.1.4 that government is aiming for a fully decarbonised electricity system by 2035.</p> <p>The question therefore arises: if offshore wind "will provide [only] 70% of the UK's electricity by 2050" then how will the 2035 aim be met and what will 'make up' the gap to 100% in 2050? In the newly designated National Policy Statements for Energy (November 2023), the government states that <i>"Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i> [NPS EN-1, Para</p>

ID	IP	Matter raised by IPs	Applicant's Response
		<p>delivering the lion's share of the country's future energy. It is for another examination to consider whether these benefits outweigh the harms, but there is an absolute requirement to deliver offshore wind. Strategic coordination is called for and reports by the Electricity Commissioner, Chris Skidmore, by the National Audit Office, by the BEIS Committee and by the UK Climate Change Committee. We need independent and objective consideration of how best to deliver decarbonisation. We agree there is urgency, but not to act rashly or in a way that will cause major regret.</p>	<p>3.3.20]. It should be noted that government's analysis and conclusion was also cited in the September 2021 draft NPS EN-1 (March 2023) at Para 3.3.21.</p> <p>This Scheme goes towards making up that gap and is therefore a critical development on the pathway to achieving the UK's legal decarbonisation obligations.</p> <p>Comment AL-03 also describes enormous infrastructure developments required to connect offshore wind to cities.</p> <p>In November 2023, Ofgem and the government published the Connections Action Plan. Page 41 of that plan describes two ways of increasing network capacity (and therefore accommodating the required capacities of low-carbon generation needed to meet net zero). The first, is increasing network build, which is <i>"an absolute priority for government and Ofgem."</i></p> <p><i>"The second, more immediate and typically lower cost method, is to maximise the use of the currently available and planned network capacity."</i></p> <p>The Scheme proposes to use 480MW of existing and otherwise unused grid connection capacity at a connection location which already exists and is connected to a robust part of the National Electricity Transmission System requiring no project-specific transmission system upgrades, and with a connection date in 2028.</p> <p>This Scheme therefore does not require the "high voltage overhead power lines across Lincolnshire" described in Comment AL-03, but instead proposes</p>



ID	IP	Matter raised by IPs	Applicant's Response
			to deliver a low-carbon generation technology which is consistent with the government's policy; which is complementary to wind generation (and therefore contributes to 'make up' the low-carbon electricity which offshore wind is unable to do itself); which is capable of delivering in the 2020s; and which can connect to an existing and otherwise unused grid connection point at West Burton.
AL-04	Mr Rose	Nuclear will render schemes like this obsolete. In fact, by reserving grid connections for solar, it might hold up the development of nuclear power stations.	Please refer to the Applicant's responses to comment RE02 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .
AL-05	Mr Skelton	Nuclear energy, for example, would reliably offer the large quantities of low carbon electricity we seek and would use brownfield sites or cover only a small footprint of land. I agree with the Atomic Energy Authority's comments regarding this matter. The 24GW of installed nuclear power expected would provide three times more electrical generation than the 70GW of installed solar power expected, and the 70GW of solar would cover an eye watering 300,000 acres of land.	Please refer to the Applicant's responses to comment RE02 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .

ID	IP	Matter raised by IPs	Applicant's Response
AL-06	Mr Skelton	If we continue on this reckless path of solar on farmland, because brownfields and rooftops are less financially attractive, then we will totally bypass the government's requirement for a rooftop revolution. It makes perfect sense to put solar panels on your roof at home and not in your garden. So why are we displacing hundreds of thousands of acres of farmland for solar, when we have enough rooftops?	Please refer to the Applicant's responses to comments AL01 and AL02 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .
AL-07	James Allan, 7000 Acres	Despite the Applicant's protestations that their scheme is essential to deliver the UK government's 70GW ambition, this is not the case. Germany is a fantastic case study for what can be achieved. Germany has already delivered 80GW of solar without a single large scale ground mounted scheme of the size being proposed at West Burton. Their larger scheme is less than 200MW, and over 70% of their capacity is installed on domestic and commercial rooftops. And that is a country with 50% greater landmass than the UK. We have a fractured landscape where developers see opportunities and act in pursuit of their financial interests, and lobby accordingly. We've seen this through the latest twists in the development of the National Policy Statements, where the critical	Please refer to the Applicant's response to comment 1.1.11 in <b>WB8.1.23 Applicants Responses to Deadline 2 &amp; 3 Submissions [EN010132/EX4/WB8.1.23]</b> .

ID	IP	Matter raised by IPs	Applicant's Response
		<p>national priority to deliver offshore wind has been watered down to become a critical national policy to deliver any form of low carbon generation, regardless of what it can contribute. So, of course the Applicant will reinforce their urgency, given the government's ambition for 70GW of solar. But this is from a starting point of 16GW already installed, 20GW in the consenting process and 140GW in National Grid's development connection register, with none of this being rooftop solar. There is absolutely no clamour for large scale ground mounted solar. The only voices you hear pushing for these schemes are the developers themselves. That fact alone should sound an alarm.</p>	
AL-08	Ms O'Grady	<p>The place for solar is on roofs in small areas where the locals benefit.</p>	<p>Please refer to the Applicant's responses to comments AL01 and AL02 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b>.</p>
<p><b>FS00 Land Use and Food Security</b> – <i>Concerns were raised about the impact of the Scheme on land use and food security</i></p>			

ID	IP	Matter raised by IPs	Applicant's Response
FS-01	Mr Skelton	The project selfishly displaces thousands of acres of much needed farmland. Promoting solar on farmland using up all spare grid connections is threatening the country's future ability to produce sustainable and reliable energy and food. Solar power plants engulfing vast areas of farmland really are the "emperor's new clothes". Using farmland for solar is "robbing Peter to pay Paul". This is never a wise strategy, and the only people who think it is a good idea is the developers and people who do not know the facts.	Please refer to the Applicant's responses to comments FS01, FS02 and FS03 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .
FS02	Councillor Spence	We have concerns over the large concentrations of solar panels proposed for this area. A large percentage of the arable land in both parishes will be covered in these devices. This will take good, productive agricultural land out of use and virtually visually blight most of the vicinity. We consider that the proposed developments are a waste of productive arable land.	Please refer to the Applicant's responses to comments CI02, CI04, CI06, and CI07 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .
FS-03	Ms O'Grady	Mr Phillips said that Lincolnshire has historically been a power producing area. No, it has not. That is Nottinghamshire, across the River Trent, not Lincolnshire. Lincolnshire is a food producing area.	Please refer to the Applicant's response to comment SB-08 in <b>WB8.1.23 Applicants Responses to Deadline 2 &amp; 3 Submissions [EN010132/EX4/WB8.1.23]</b> .

ID	IP	Matter raised by IPs	Applicant's Response
		This project will cause disruption to our lives, lifestyles, fauna and flora and our food producing capabilities.	
FS-04	Mr Rose	The whole strategy of looking for solar to generate 70GW of electricity by 2035 is flawed. This scale of output will need the sacrifice of at least 70,000 hectares of land. This is a shocking figure.	The Applicant notes this comment, this relates to Government strategy and policy rather than the Scheme.
FS-05	Ms O'Grady	Land needs to do so much more than solar to rectify the damage that humans have done to the land and the climate.	The Applicant notes this comment.
FS-06	Councillor Spence	There are other derelict and brownfield sites available, along with millions of domestic and industrial roofs that could accommodate them.	Please refer to the Applicant's responses to comments AL01 and AL02 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .
<b>CI00 Cumulative Impacts</b> – <i>Concerns were raised about the role of a number of NSIP solar farms in the area</i>			
CI-01	Mr Skelton	If at the end of this process the many harms remain unseen, then in the national interest, please consider the following five points. We do not create high impact solar industrialised zones in the UK countryside, such as the disproportionate	Please refer to the Applicant's responses to comments CI02, CI04 and CI07 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .

ID	IP	Matter raised by IPs	Applicant's Response
		five NSIPs, covering over 13,000 acres, proposed around Gainsborough, consisting of West Burton Solar Project, Cottam, Gate Burton, Tillbridge and Steeple. They all fall within a 10km radius, with a sixth falling just outside, called One Earth Solar.	
<p><b>PL00 Planning process</b> – <i>Concerns were raised about the administrative burden of the NSIP process and Examination of the Scheme</i></p>			
PL-01	Ms Bingham	How are the public supposed to keep up with the many solar applications in this area, when some reports are as long as 79 pages, each with different appendices. I am angry with this process and it is shutting us out.	Please refer to the Applicant's responses to comments CR01 and CR04 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .
<p><b>FR00 Flood Risk</b> – <i>Concerns were raised about the risk of flooding and the role of the Scheme in potentially exacerbating this risk</i></p>			
FR-01	Mr Johnson	In the past few weeks, we have experienced extensive flooding in the area designated for the installation of solar panels. My concerns are regarding the management of the land, as the land sits inside the River Trent flood basin. I understand	<p>Regarding land management, the Scheme is responsible for the management of land and ditches which is set out in the <b>Outline Landscape and Ecological Management Plan Revision D4/EX4/WB7.3_DJ</b>.</p> <ol style="list-style-type: none"> <li>1. The operational management and monitoring requirements are set out within <b>WB7.14_B Outline Operational Environmental</b></li> </ol>

ID	IP	Matter raised by IPs	Applicant's Response
		<p>that the land management will be made the responsibility of the landowner and not the developer, including flood risk. The installation of the panels will naturally cover a large percentage of the ground, reducing the ability of the ground to act as a soak away, therefore leading to an early saturation of the surrounding lands, leading to a heightened flood risk.</p> <ol style="list-style-type: none"> <li>1. Has the Applicant provided a detailed document on how the landowner will provide land management in relation to the additional water displacement?</li> <li>2. What guarantees are being provided by the landowner or landowners to ensure land flood management and compliance over the planning permission period?</li> <li>3. What will be required to mitigate flooding risks prior to the panel installation, and is there a development plan of works to cover this? Has this been accepted by the relevant authorities?</li> </ol>	<p><b>Management Plan Revision C [EX4/WB7.14_C]</b> with Table 3.4 specifically dealing with hydrology, flood risk and drainage. These measures are secured by Schedule 2, Requirement 14 in <b>WB3.1_E Draft Development Consent Order Revision E [EN010132/EX4/WB3.1_E]</b>. The Applicant has provided information and data to the Environment Agency relating to the volume of floodplain loss from the frames of the panels in response to their comment at paragraph 4.9 in their relevant representation <b>[RR-090]</b>. They have confirmed they are happy with this information and the volume of displaced is insignificant. The Applicant will append this information to the Statement of Common Ground when the next version is submitted into the Examination.</p> <ol style="list-style-type: none"> <li>2. As noted above, please refer to Table 3.4 in <b>WB7.14_B Outline Operational Environmental Management Plan Revision C [EX4/WB7.14_C]</b></li> <li>3. Please refer to the Applicant's responses to comment FR01 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b>. In summary, the Scheme will not have a detrimental impact with regards to flood risk in the areas and areas that currently flood will continue to flood as existing. The drainage strategy and detailed drainage design will be developed during the detailed design process, as secured by Requirement 11 in Schedule 2 of the <b>3.1_E Draft Development</b></li> </ol>

ID	IP	Matter raised by IPs	Applicant's Response
		<ol style="list-style-type: none"> <li>4. What are the relevant authority's thoughts on the additional flood risk management being the responsibility of the landowner?</li> <li>5. What insurance cover will be provided to compensate any affected properties and land?</li> </ol>	<p><b>Consent Order Revision E [EN010132/EX4/WB3.1_E].</b> The Applicant has undertaken further engagement with the Environment Agency on this matter. It is understood that further data for the Tidal Trent is available from the Environment Agency which includes appropriate climate change allowances up to the 2080's epoch. However, the Environment Agency may not be able to provide the data to the Applicant prior to the close of the Examination. Once this data has been received the Applicant will update the Flood Risk Assessment [APP-089] and its Appendices [APP-090 to APP-093] accordingly.</p> <p>In the event that the data is not available in time to update the Flood Risk Assessment prior to the end of the Examination, it was agreed with the Environment Agency on a call on 21 February 2024 that the updated flood risk assessment should be submitted for approval prior to construction as this will ensure that appropriate mitigation is in place taking into account climate change allowances up to the 2080s epoch.</p> <p>Requirement 22 in Schedule 2 to the draft DCO submitted at Deadline 4 [EX4/WB3.1_E] has therefore been added to require the Applicant to submit the updated flood risk assessment to the Environment Agency prior to commencement of the authorised development. The drafting of Requirement 22 has been agreed with the Environment Agency. In the event that the flood risk assessment</p>



ID	IP	Matter raised by IPs	Applicant's Response
			<p>can be updated prior to the close of the Examination then this requirement will be removed from the draft DCO.</p> <ol style="list-style-type: none"> <li>4. This comment is not for the Applicant, albeit subject to the Applicants comment to point 3.</li> <li>5. As noted in point 3 above that , the proposed development will not have a detrimental impact with regards to flood risk in the areas and areas that currently flood will continue to flood as existing.</li> </ol>
FR-02	Councillor Spence	<p>The narrow corridor between the proposed solar developments will be excavated to bury the cables carrying the power to the Cottam Power Station connecting point. All four of these developments have chosen virtually the same route to Cottam, and they would all like to cross the River Trent at the same point. This is where there are already two high voltage overhead power lines, a large diameter gas pipeline and a major drainage channel. At this point there is a large flood embankment. The embankment is not situated here to protect Marton or Gate Burton, which have never flooded, at least since Roman times. These defences prevent flood water running down the drainage ditches and ultimately ending up in the</p>	<p>The West Burton Solar Project has a connection point at West Burton Power Station and not Cottam Power Station, but it is acknowledged that the crossing point of the River Trent will be in the vicinity of those developments that will connect into Cottam Power Station.</p> <p>The proposed development will not contribute to an increase in flooding offsite. Please see the Applicant's response to question <b>1.15.9 in WB8.1.23 Applicants Response to Deadline 2 And 3 Submissions [EN010132/EX4/WB8.1.23]</b>.</p>

ID	IP	Matter raised by IPs	Applicant's Response
		<p>Brayford Pool in the centre of Lincoln, which will cause major flood damage. Laying these cables with the necessary heavy machinery required will ruin the productive land, decimate wildlife and compromise the flood defences on the River Trent. The River Authorities are also concerned about these proposals and have expressed their reservations.</p>	
<p><b>BS00 Battery Storage</b> – <i>Concerns were raised about the safety of battery energy storage</i></p>			
BS-01	Councillor Spence	<p>The Parish Council is also alarmed at the idea of installing large battery storage systems in both parishes. The regulatory bodies do not seem to have any plan on how to extinguish fires or control associated potential hazards. What risk assessments have been made?</p>	<p>Please refer to the Applicant's responses OEM-01, OEM-02 and OEM-03 in <b>WB8.1.19 The Applicant's Response to Written Representations and Other Submission at Deadline 1: Part 3 [REP3-036]</b>.</p>
BS-01	Ms O'Grady	<p>The cabling for the project is proposed to come through our village, and the battery storage. The fire risk is enormous.</p>	<p>Please refer to the Applicant's responses to OEM-01 in <b>WB8.1.19 The Applicant's Responses to Relevant Representations at Deadline 1 Part 3 [REP1-050]</b>.</p>

ID	IP	Matter raised by IPs	Applicant's Response
<b>SC00 Supply Chain</b> – <i>Concerns were raised about the supply chain for the Scheme</i>			
SC-01	Ms Bingham	Mr Phillips said at the Lincolnshire Showground meeting that we should hang our heads in shame for purchasing Chinese products. I don't think there's much choice because our manufacturing industry was exported. Our government is exporting the carbon problem.	The Applicant notes this comment.
<b>LV00 Landscape and Visual</b> – <i>Concerns were raised about the impacts of the Scheme on the local landscape</i>			
LV-01	Mr Rose	The cumulative visual effect of such a large area of solar panels on our rural landscape is hard to comprehend. This has never been done before. There can be no doubt that our outlook will be blighted as far as the eye can see. By granting this project, you will be destroying the landscape which generations of our forebearers have toiled to create.	Please refer to the Applicant's responses to GEN-01 in <b>WB8.1.19 The Applicant's Responses to Relevant Representations at Deadline 1 Part 3 [REP1-050]</b> .

ID	IP	Matter raised by IPs	Applicant's Response
LV-02	Ms O'Grady	I am a fourth-generation family farmer, and our lives will be totally destroyed. There will be nowhere safe to ride, to cycle, for children or for dog walkers.	
<b>MS00 Miscellaneous</b> – <i>Concerns were raised about other matters</i>			
MS-01	Ms White	<p>There does not appear to be a readily available report with the advantages, both long term and short term, to UK citizens, and in particular the local residents who will be surrounded by these solar farms. Please can we have an easy report for the public to be able to read?</p> <p>Also, what happens with these panels? Who is going to be maintaining them and what is the efficiency of them?</p>	Please refer to the Applicant's response to comments PRI-06 and PRI-15 in <b>WB8.1.2 The Applicant's Responses to Relevant Representations [REP1-050]</b> .
MS02	Ms O'Grady	The solar projects won't create any long term jobs in the region, but will change the landscape for 40 to 60 years. And what actual guarantees are there at the end of their lifetimes?	Please refer to the Applicant's responses to comments CH02 and MS03 in <b>WB8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> .

## Appendix A – Note on Farming Subsidies

In England, Defra provides grants and other funding to farmers to manage land for the benefit of the environment. Some of the highest paying Sustainable Farm Initiative (SFI) options are measures that take arable land out of arable production for the benefit of wildlife.

The current SFI actions for farmland wildlife on arable and horticultural land includes Pollen and Nectar Flower Mix (SFI Code AHL1). This action on arable land can be rotational or static, can occupy whole fields and pays £614 per hectare per annum. Details of the SFI actions can be found at the government GOV.UK website <sup>1</sup>.

The SFI is the replacement in England for previous agri-environmental support under the Common Agricultural Policy (CAP). As this is a phased transition many farms in England continue to receive support from the outgoing CAP scheme, Countryside Stewardship (CS). CS Management options in England for 2024 include Nectar Flower Mix (AB1) paying £614/ha/a, and Arable Reversion to Grassland with Low Fertiliser Input (SW7) at £326/ha/a. Further details are available from the GOV.UK website<sup>2</sup>.

Defra provides this funding because of the environmental benefits that are derived from the suspension of cultivation and the provision of a diverse plant mix in the sward. These environmental benefits include biodiversity, flood risk, water quality and soil health. The reversion of arable land to a permanent green cover in a solar farm (with low to no inputs of fertiliser and pesticide) delivers these same environmental benefits without the need for the Defra SFI and CS payments to the farmer. Added to this the Scheme generates renewable power.

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<sup>1</sup> <https://www.gov.uk/guidance/sfi-actions-you-can-do-on-different-eligible-land-types-and-features>

<sup>2</sup> <https://www.gov.uk/government/publications/mid-tier-grants-and-wildlife-offers-2023-countryside-stewardship/applicants-guide-mid-tier-grants-and-wildlife-offers-2023#annex-2a-list-of-mid-tier-multi-year-management-options-and-capital-items>