

WEST BURTON SOLAR - DEADLINE 7 – 8 MAY 2024

I have attended meetings, submitted written representations at every opportunity AGAINST this application by Island Green Power for an order granting Development consent for the West Burton 1, 2 and 3 Project in Lincolnshire. This and the two further solar schemes, Cottam 1, 2 and 3 and Gate Burton Solar, has been my focus for TWO years of my life in challenging these inimical schemes. Including Tillbridge Solar, Luminous Energy and Steeple Renewables this land grab totals 13,000 acres all within a 10 km radius. The Coalescence and Cumulative effects of these and scale will be catastrophic to the area. The entire County of Lincolnshire has appallingly become a target and dumping ground for anything solar or energy related.

My own home is in the epicentre of the proposed four (now six) solar projects which surround communities to the North, South, East and West. Residents of the 30 affected communities across this incredible open and beautiful landscape, feel they been disadvantaged throughout the Examination process – unable to keep up with the process of three solar project examinations - there are many who still don't really know about this/these schemes or did not have access to the technology required to take part in the Examination process and have consequently been fully excluded from the process. These 30 communities, affecting 40,000 people, will be destroyed if West Burton Solar and the other five solar schemes now, either in examination or coming forward are approved. Add to these Voltis Solar (currently scoping), One Earth Solar, Fosse Green, Great North Road, Springwell, Heckington Fen, Beacon Fen and Mallard Pass and Lincoln City and Lincolnshire as a County will be majorly detrimentally affected. *In fact catastrophically affected as all of these solar projects will consume 27,000 acres of Lincolnshire arable land with the continuing risk of even more coming forward in this area.* The landscape will be an eyesore – industrialised by a sea of black glass, dangerous BESS batteries and other paraphernalia and completely altering landscape character. Boundaries changed by security fencing and the intrusion of CCTV. The Applicants for West Burton, Cottam Solar and Gate Burton Solar have constantly downplayed the cumulative effect these schemes will have on the area and the communities which is shameful and reprehensible as the cumulative effect will be disastrous.

The NPPF includes an overarching objective to protect and enhance our natural built and historic environment. In 20 years these industrial solar schemes will be white elephants and obsolete just at the time when replacement solar panels will be required and we will be left with a barren, inhospitable wasteland.

Being renewable does not mean being zero carbon.

The grave concerns of the 30 affected villages and communities are well founded – we are faced with a David and Goliath situation.

Serious questions remain over the environmental benefit of the application, and it should not be recommended for approval by the Secretary of State.

- **FOOD SECURITY**

All of these projects are on agricultural food producing land and represents a wholly inappropriate change of use of a substantial land area when food security and the farming sector are under massive stress.

Mr Rishi Sunak told farmers on 24 February at the National Farmers Union Conference and circulated on TV News channels that he believed 'food security was a vital part of our national security'. Who is going to feed Great Britain as a country? We can't keep relying on imported goods when the countries importing them are also experiencing their own climate change issues, drought and growing populations worldwide.

The summer drought of 2022 had a significant impact on UK food production and, coupled with climate related issues in Spain, Portugal and Morocco, led to winter shortages of fresh foods in UK shops including 30% of fresh fruit and vegetable imports from the Netherlands and Spain. With more droughts likely in future years affecting agriculture worldwide, maintaining good land in production is an increasing priority. 60% of our food is imported – is this environmentally sustainable? The EAC was correct in its warning.

- **LOW ELECTRICITY GENERATION VERSUS LOSS OF LAND – GREAT RISK OF THE FARM LAND NOT BEING REINSTATED**

This application is not being made to counter global warming or contribute to the UK target of net zero by 2030 or as latterly stated by 2035. This is exploitation by the Applicant at an enormous scale and cost! Developers promote the cheapest solutions only and do not consider a range of feasible options. There are simply no benefits for the local community. All the energy generated goes direct into the National Grid which could go anywhere in the country and, when on average, solar will only deliver 11% of its stated output in the UK.

What if solar farms covered every other *productive* field in the UK? Where are the limits?

The amount of arable land in the UK is in decline. Our food security would then be gravely threatened. It currently stands at 14.8million acres, which is the lowest since World War 2.

The fact that BMV land happens to be available from a farmer who wants to abandon farming is not compelling evidence and BMV and Grade 3b land should be excluded from industrial scale solar projects.

If there is no **poor quality land** within a district the only logical conclusion is that industrial scale solar plants are not the right renewable solution for that area.

We are told this land will not be available to return to agricultural use for a minimum of 60 years.

- i) Will the land revert to agriculture?
- ii) What condition will the land be in in 60 years?
- iii) Who will own it – foreign absent investors with no concern for the people or the landscape?

- **HARMFUL IMPACT ON SOCIO-ECONOMICS, TOURISM, RECREATION AND AGRICULTURE**

The greater Lincolnshire visitor economy is currently estimated to be worth over £2.39bn per annum with long-term growth potential. It is high quality and varied offered across city, coast and countryside and supports at least 30,000 fulltime equivalent jobs. It is absolutely essential to the area. Tourism and visitor footfall is an important feature of the 30 affected communities all year round. These villages and their surroundings have history in abundance – they are tourist destinations including the beautiful and historic City of Lincoln.

The region is responsible for growing 30% of the nation's vegetables, and producing 18% of the poultry, with a total agricultural output of over £2bn in 2019, representing 12% of England's total production with major arable, poultry and meat processors spread right across the area.

- **HARMFUL IMPACT TO LOCAL EMPLOYMENT**

Loss of businesses and employment (tourism, tenant farmers and others) to the affected villages and beyond which fall within the 13,000 acre solar projects. Holiday lets and many other businesses. There will be significant harm to local agricultural businesses, especially those which may be made the subject of compulsory purchase.

- **IMPACT ON HERITAGE SETTING / HISTORIC ENVIRONMENT -**

Historic structures act as a focal point in countryside views and make a huge contribution to environmental quality. Their setting is often a major part of their significance, in particular the Bishops Palace. Solar farm development deprives them of their context, minimising the extent of the setting of individual buildings and down-valuing their significance.

West Burton 3 - Stow Park Medieval Bishops Palace and Deer Park

I agree absolutely with Historic England and West Lindsey District Council's comments about the nationally important archaeological site of Stow Park Medieval Bishops Palace and Deer Park as set out on Pages 65 to 72 of the 'Applicant's response to Deadline 5 Submissions - April 2024'. Further, in supporting their comments please note the greatness and prominence of St Hugh of Lincoln who was born in Avalon in Burgundy, France in 1135. He became Bishop of Lincoln in September 1181. He was a mighty builder, rebuilding Lincoln Cathedral after the earthquake of 1185. Hugh loved animals, and the story of the swan is told at length in the *Magna Vita Sancti Hugonis*, written by Hugh's chaplain, Adam of Eynsham. The swan arrived at Stowe, the Bishop's Palace near Lincoln, on the day of Hugh's enthronement

as bishop. St Hugh adopted this swan as a pet. It became tame and is said to have developed a lasting friendship with the bishop, even guarding him while he slept. St Hugh's primary emblem is a white [swan](#), in reference to the story of the swan of [Stow, Lincolnshire](#).

When he died at his London residence in 1200 his body was brought to Lincoln for a great ceremonial burial in the Cathedral, attended by two Kings and three Archbishops. His shrine is in the Lincoln Cathedral.

The significance of St Hugh and the swan coupled with Stow Park Medieval Bishops Palace and Deer Park is further demonstrated in the images below where the swan and its association with the village of Stow and Sturton by Stow stands front and centre on the village sign below, also on the village school signage and the signage for the pre-school group attached to the school.



West Burton 3 - Stow Park Medieval Bishops Palace and Deer Park



West Burton 3 - Stow Park Medieval Bishops Palace and Deer Park



- **WAREHOUSE ROOFS FOR SOLAR PANELS AND DOMESTIC ROOFS**

Solar PV on warehouse rooftops would provide a reliable source of energy at lower cost for businesses, and also generate sufficient extra power to double the UK's solar capacity in line with net zero targets, particularly at a time when warehousing and logistics is transitioning to electrification and consumption is rising along with prices.

The UK's 20% largest warehouses can provide 75 million square metres of roof space, equivalent to the footprint of 500,000 houses. An independent research report, commissioned by the UK Warehousing Association in 2022, and produced by specialist consultancy Delta Energy & Environment (Delta-EE), shows UK warehousing has the roof space for up to 15GW of new solar power, which could:

- Double UK's solar capacity;
- Reduce carbon emissions by 2 million tonnes/year;
- Cut warehousing electricity costs from between 40-80%;
- Save the warehousing sector £3bn/year;
- Provide a more secure power supply;
- Enable the sector to become a net producer of green electricity.

The UKWHA has published a paper to this effect, "Investment-Case-for-Rooftop-Solar-Power-in Warehousing"

As I understand it, a recent Council for the Protection of Rural England (CPRE) report into Solar PV on warehouse rooftops confirms that not only would this provide a reliable source of energy at lower cost for businesses, but it could also generate sufficient extra power to double UK's solar capacity in line with net zero targets.

Why use precious farmland ?

- **HARMFUL TO WILDLIFE AND BIODIVERSITY. HEDGEROWS, TREES**

There is so much wildlife in this area. Local residents have photographed / witnessed Barn Owls, Tawny Owls, Long tailed tits, Kestrels, Great Tits, Red Kites, Chiffchaff, Linnet, Brown Hares, Long-eared bats, Pipistrelles, Hedgehogs, Roe Deer, Muntjac Deer, Butterflies, Dragonflies, Moths, Common Toads, Frogs, Lizards, Grass Snakes, resident Swans, Canadian Geese, Badgers, Fox, the list is never ending. The existing fields and hedgerows are their homes – WHY destroy the habitat and wildlife already there ? Swans reside on the fields for several weeks every year. We must

protect and regenerate their existing habitats for the wildlife to prosper into the future not remove and replant which would lead to a bio-diversity net loss not net gain. Hedgerows are the 'reservoirs of life'. The present hedgerows and verges bring ecological benefits.

You Can't Put A Quart Into A Pint Pot – if all four solar schemes, West Burton, Cottam, Gate Burton and Tillbridge were granted, the amount of land each project seeks to provide in mitigation for wildlife is miniscule compared to the 10,000 acres these schemes would consume, and which the wildlife currently has freedom and access over. They cannot be compressed into a smaller habitat ! Where will the wildlife go ? It will be harmful and damaging as there will be insufficient food and habitat for their survival. They will become extinct in the area or disappear elsewhere to our great loss !

The biodiversity improvements, which include attempts to green over the high perimeter fencing, does not mitigate the harm the solar farm will cause to the local deer population and other free-roaming wildlife. Transitory animals will have their traditional routes blocked. Deer will be diverted onto roads. Sadly we are already seeing many muntjac and other deer killed by vehicles in the area so far this year.

Birds and bat deaths are commonly mistaking the solar panel glass for water.

Many modern farming practices have had a negative effect on the ecology of our countryside. This is something that is now recognised and that the government, the farming industry and various environmental bodies are seeking to change through various measures. These include a new structure for farm support payments and the encouragement of wildlife areas, tree-planting and re-wilding which I support.

- **IMPACT ON LANDSCAPE AND AMENITY / MENTAL HEALTH**

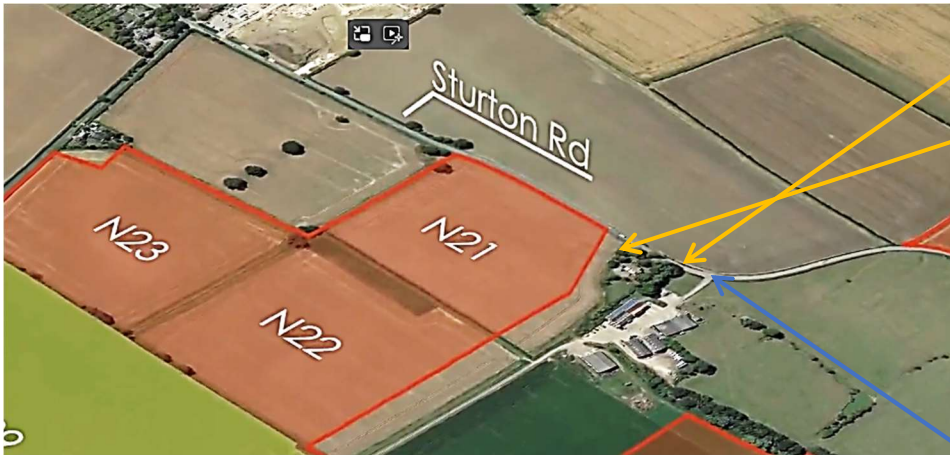
The impact on the landscape of this development would be monumental and last up to and exceeding sixty years. The loss of the natural and agricultural landscape to fencing, screening and tracking panels over 4.5 metres tall would fundamentally alter the area and communities based there. These changes will deeply affect the residents of the 30 affected communities as many will be surrounded not only by Island Green Power's West Burton Solar project but the cumulative effects of Cottam Solar 1, 2 and 3, Gate Burton Solar and Tillbridge Solar, and now Luminous Energy and Steeples Renewables in the mix.

Over 3,000 acres of development (13,000 acres of cumulative solar) will have a negative impact on the health and mental wellbeing of residents, most of whom will be unable to escape from this/these effects and due to the disproportionate size of the proposal. The proposed walkways and permissive paths by the developers ignore the fundamental change in the landscape itself, forcing ramblers to either walk through thick concentrations of solar panels with the incessant noise from operating equipment or forced to choose alternative sites further afield to walk. This will be particularly isolating for residents.

- **FLOODING RISKS**

There is a long history of flooding on the West Burton 2 proposed site and surrounding neighbouring land, particularly so in recent years and continues to be at risk. See flood images at Deadline 5 submission from the writer. Any further increase in the risk of flooding from 4.5m high tracking solar panels is unacceptable given the current flooding problems in the area particularly as these 4.5metre high solar panels are sited in **Field N21, N22 and N23** as shown in the Video at Deadline 4 with **Field N21** along the perimeter of the very busy B1241 road Saxilby to Sturton by Stow together with the further risk of Glint and Glare to motorists from the panels. Consideration should be given to flooding on this section of road as there are no dykes on the roadside edge of this land which has a natural fall towards the road. These issues must be addressed as **Field N21** was holding water in areas during the recent spells of heavy rain. There is little, if any hedgerow along this route which allows for amazing views across these fields to the Cliff edge and Lincoln Cathedral.

Sections of West Burton 2 site below



This is the B1241 a very busy road between the A57 and the A1500.

There is a dip in the road at this section approaching the bend.

This corner of Field N21 falls towards this dip. Excess surface water was witnessed in this field corner during periods of heavy rain this Winter/Spring which is the site of 4.5 metre solar panels which will exacerbate flooding here.

Glint and Glare from the 4.5 metre tracking panels is a further issue.

This is the farm / work entrance. There is often mud on this area of road and beyond in both directions from the farm vehicles.



There will be 4.5 metre tracking panels at **N11** and **N13** above both bounding the busy **B1241** road between the **A57** and **A1500**. Flooding is questioned here too as the land has an incline towards this road with the prospect of Glint and Glare facing motorists here also.

I consider the Applicant has neglected to properly investigate and mitigate enhanced flooding risks both on and off-site for **West Burton 2**. I can find no record at Deadline 4 *that the Applicant has responded to Action Point 5 from ISH3 raised by the Planning Inspectorate ? Please advise where this can be found.*

*Quote: **The Applicant undertakes to set out the precise locations of U.S. research** into water drop run off from photovoltaic (PV) panels (if such information is available). And to set out the extent to which geography of the study is material to the conclusions drawn. Unquote.*

Nor does the Applicant's response to my Deadline 5 Submission April 2024 – Page 224 - Reference P Mi-04 Hydrology, Flood Risk and Drainage answer my question on flooding as the response again quotes research undertaken in the United States (US) by Cook and McCuen (2013) referred to at Action Point 5 from ISH3. Having checked the basis of the research into water drop run off from photovoltaic panels I find it was not based on a tangible full scale solar park on agricultural or other land in the United States but a simulation via a custom-built computer model. This computer

model confirms and identifies that further investigations are needed to transfer the obtained results at the plot scale to a real scale solar park as so far only plot-scale experiments have been conducted.

As it is not known what type of land, the area of the United States, or grade of land that a real scale solar park would be used for research it cannot be concluded that the Cook and McCuen (2013) simulation research is entirely accurate as there are many variables to consider in a real scale solar park situation therefore the Applicant's response cannot be used to mitigate such flooding on West Burton 2 fields.

What is known is that storm water run-off over the longer term when the surface roughness of the solar park ground is decreased through compaction, rainwater run-off peak flow increases in the order of 6 – 35% as compared to the pre-installation scenario which gives rise for concern over the impact of land use changes on storm water runoff from the construction of large-scale solar power plants.

For example, the area under the panel rows may experience, in time, a lower vegetation growth rate as compared to the space between rows because of the reduced amount of photosynthetic active radiation.

Further, it is undeniable that structures such as the battery containers, concrete supports, foundations for fences and other impervious equipment along with ground compaction from maintenance vehicles on the land will result in less land able to take up the excess water.

Grazing Sheep and bee-keeping on industrial scale solar projects are a pretext, a subterfuge. The Applicant must Stop pulling the wool, sorry Sheep over our eyes !

- **SOLAR PANELS / CARBON BENEFIT / ENVIRONMENTAL QUESTIONS**

While scrutiny of solar supply chains has increased, transparency has decreased in the solar industry since the initial reporting on the complicity of the industry in state-imposed forced labour in the Uyghur Region, where millions of Uyghurs and other Turkic ethnic groups face mass oppression. The lack of transparency has made it increasingly difficult for the average person to verify whether supply chains are free from risk of Uyghur forced labour and reduces trust in the solar industry.

There are questions over where the panels will be built and with what energy source. Canadian Solar manufactures panels in China, Thailand, and Vietnam, likely relying on coal power stations for the required energy input.

In 2022, 38% of Vietnam's energy came from coal, c20% of Thailand's energy came from coal and in 2021 61% of China's energy came from coal.

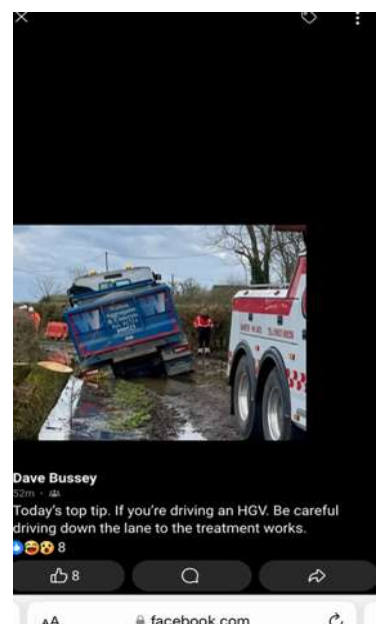
These panels would then have to be shipped to the UK and questions remain over how they can be safely disposed of after decommissioning as currently solar panels are sent to landfill.

- **TRANSPORT**

The lorry opposite has discovered the complications and difficulties of travelling on an unsuitable, single track lane in Willingham by Stow on 4th March 2023. Another instance of the risks and dangers of HGV's on these single track country lanes around the proposed 10,000 acres of solar projects. These roads are totally unsuitable for HGVs.

We do not want the Solar Companies widening these narrow lanes used by cyclists, dog walkers, horse riders, hikers and walking groups to accommodate their transport problems.

This is the third incident involving a HGV in under 12 months on these narrow lanes. It is wrong for West Burton Solar and the other three solar companies intentions to widen these lanes to accommodate their heavy machinery under their Transport and Access Construction and Operational Traffic Management Plan.



The incident in the further images below show a HGV crane has toppled into a drainage dyke on the Narrows on the outskirts of Stow on the Ingham Road, alongside the fields of the location of the proposed Cottam 1 solar site on 19 February, 2024. This road is known as ‘The Narrows’ for obvious reasons.

More ruination of the area by digging up the grass verges and the single track country lanes which we care about and which in turn will destroy the habitat and bio-diversity already present.

These incidents cast doubt on the various statements submitted during this process by West Burton 1, 2 and 3 Solar (Cottam 1, 2 and 3 Solar and Gate Burton Solar) in respect of transport access on the narrow and winding roads around the proposed solar project(s). The roads are unsuitable for abnormal load vehicles and HGVs as has been stated by many Interested Parties in their submissions.



Finally, we have to remember first and foremost that the ‘experts’ **have been commissioned** for their ‘advice/reports’ by the Applicant(s).

CONCLUSION

The Planning Inspectorate should recommend that the Secretary of State reject this application on the basis of:-

- ***Loss of Best and Most Versatile agricultural land.***
- ***Evidenced forced labour in Canadian Solar’s supply chains (Sheffield Hallam University Reports – “In Broad Daylight”, May 2021 updated 2 November 2023).***
- ***Inadequate consultation and poor public engagement***
- ***Impact on landscape and amenity***
- ***Biodiversity and environmental concerns***
- ***Flooding risks***
- ***Questionable carbon benefit***
- ***Questionable solar energy output (11%)***