

**RE West Burton Solar Project.**

Your Ref EN010132

29-11-2024

Dear Mr. Wheadon

With reference to the above alteration and removal of panels abutting the medieval settlement of Stow Park Deer Park.

I would like to express my strong opposition to the proposal for multiple reasons.

**Part one general concerns**

**1. Projects should be considered as one.**

West Burton Solar Project is only one of 4 NSIPs around us currently which total 10,000 acres of good quality high yielding farmland. These proposals have to be looked at as one as they will devastate the whole area although I understand that two very close to this have already been passed; is this not enough for one area?

There are now at least 7 NSIPs for solar in Lincolnshire and multiple applications for smaller sites as well as the existing sites, this is five times the national average.

**2. Food Security**

Food security is an equally important issue as energy security, in fact possibly more so, if we don't have food, we don't need energy to cook it.

**3. BMV Land**

With reference to your main point: -

Access to independent surveyors has been denied and regardless of percentages above or below 3A or B which is an old and outdated method of classification: -

The developer states that the land is not the best and most versatile when in fact we only have their word for it, I have lived and worked in the area for over 30 years in the countryside and know many farmers and farm workers. They have quoted many locations within the proposed sites that have land as good as grade 2, even on the heaviest clay land they are getting grain yields averaging 12 tons per hectare, 50% above the national average. This is due to moisture retention in the drier summer months we have now.

The developer States that

**West Burton 3 is 45% Best and Most Versatile**

Furthermore, they **admit** that this is some of the best and most versatile land, but they are basing their application on the fact that it is classed as degraded farmland grade 3B by a margin of only 5%, but even the grade 3B locally due to its heavy clay nature has on the three local farms I have been able to interview have in last year and recent years achieved crop rates **as much as 40% higher than the national average coming in up to 12 tons per ha.**

**Temporary ???**

They state in section 16; that there will be some compaction in both the construction operations and the decommissioning stages and that this will be adverse, I agree, they then go on to state that the land will benefit from resting, I disagree.

During the construction the land will become compacted, it will then receive **no tilling or aeration for 40 years!** as it normally would after a year at most of fallow, it will also be compacted by site traffic carrying out maintenance and then be decommissioned where further compaction will take place.

This in no way can be beneficial for the land, further more we need food security 10,000 acers or 4000ha x the average wheat yield of 7 tons is 28,000 tons of wheat a year lost, or 1.12m tons over its lifecycle, as shown in the figure below we are losing production at an alarming rate.

**Figure 1: Percentage changes between 2019 and 2020 by UK country**

	UK % change	England % change	Scotland % change	N. Ireland % change	Wales % change
Wheat area	-23.6	-24.6	-13.0	-13.6	-7.9
Potatoes area	-1.1	-0.8	-0.7	-3.6	-19.6
Pigs	-0.5	-1.0	5.9	-1.0	16.4
Sheep	-2.6	-2.4	0.8	-1.3	-5.7
Cattle	-1.3	-2.1	-0.9	0.0	0.2

#### 4. Loss of jobs and services

- Lincolnshire is the UK Food Valley and Lincolnshire had the largest crop output of the ITL2 regions within the East Midlands in 2021. This was an increase of £299 million (30%) from 2020 to £1,280 million in 2021.

gov.uk/government/statistics/total-income-from-farming-for-the-regions-of-england/total-income-from-farming-in-the-east-midlands-of-england

- In total the **food chain provides 24% of jobs** throughout Greater Lincolnshire (as compared with just 13% nationally) and **21% of its economic output** (7% nationally).
- The future of the food chain is therefore absolutely vital to Lincolnshire and its population, and we are strategically important to national [food security](#).**
- Boasting more Grade 1 agricultural land than any other LEP in England, the Greater Lincolnshire agri-food sector will double its contribution to the economy by 2030 through an ambitious programme of investment in productive capacity, skills and knowledge to drive an increase in high- value- added sales to UK and export markets.**

greaterlincolnshirelep.co.uk/priorities-and-plans/sectors/agri-food-sector/

#### 5. Desecration of the landscape

A full understanding of the archaeological resource cannot be established as the cultural heritage hasn't been completely assessed, Stow Park is a unique historical site.

Why am I saying this?

Because inadequate field trenching has taken place, With 342 trenches across 886 ha, less than 0.034% of it and the majority around the boundary of the site.

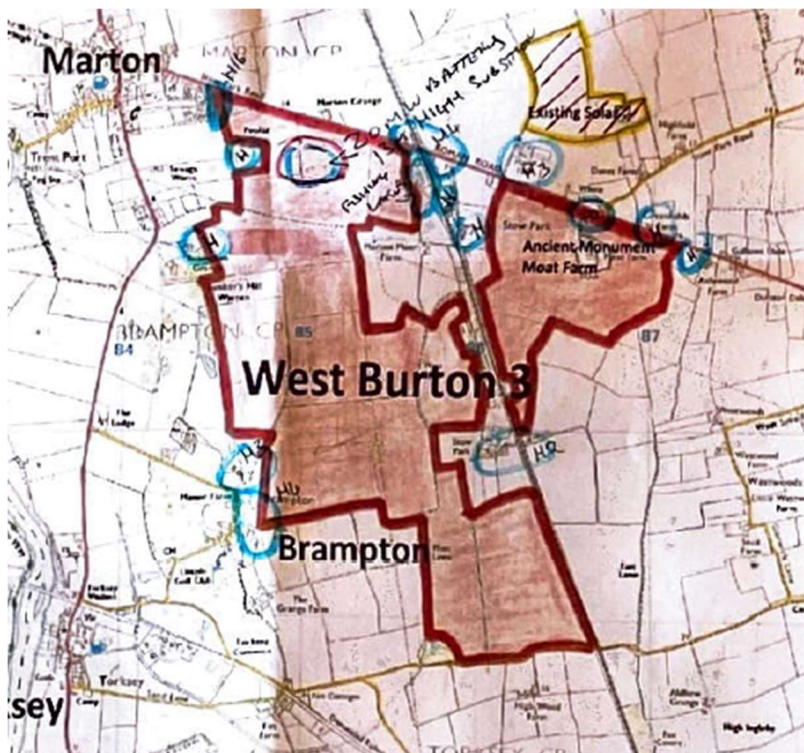
With 2pc trenching informed, appropriate mitigation measures cannot exist for nearly 80 pc of the 3 sites!

The submitted documents, like the ones submitted for the land classification, are simply not fit for purpose, nor are they in accordance with professional standards and policy s 57 requirements It gets worse than not having done proper trenching to identify possible remains.

The developer suggests that they will use concrete! Yes, concrete ground anchors! This is unacceptable as it would cause any surviving archaeology to be destroyed without investigations.

This disaggregated, unplanned scheme, partitioning and damaging the rural agricultural landscape, by its design maximises the harm to communities, segregates rural villages and places them effectively permanently in an industrialised landscape. The effectively permanent lifespan of the scheme exacerbates the various harms to communities. It completely surrounds dozens of properties and with panels 4.5m high no amount of screening will help. It will destroy many people and their right to a peaceful life.

I have attached a map of the site and marked over houses that immediately abut or are surrounded by the proposed industrial solar plants, there are hundreds, possibly thousands more that will be affected within the three schemes. Many people have put their life's work and savings into their properties and as a community that has a higher than average retired population, if this proposal goes ahead, it will ruin peoples lives and is already causing much stress and anxiety. People are worried about property values, mental health, disruption caused by the construction, their business, particularly tourism and supply services to the agricultural and tourism sectors.



WEST BURTON  
HAS AROUND 58  
ADJACENT OR SURROUNDING  
WITH AN ADDITIONAL  
200 HOMES + SCHOOL  
VERY CLOSE TO  
BATTERIES SUBSTATION.

**The developer states it will enhance biodiversity, the wildlife etc yet they have put in an application to remove 35 miles of ancient hedgerows,** the wildlife and biodiversity that these sustain cannot be replaced, it will take years and years before anything they plant will contain a fraction of what is there now.

They state that sheep can be grazed under it, although theoretically this is possible in practice it would be extremely difficult, imagine trying to herd them up! There are two solar plants abutting the rear of our property already covering around 35 acres, one is quite old with panels around 1m high and well-spaced apart, there are a few sheep which graze in there to keep the grass down but not a commercial herd. Why would we want to produce more lamb it is the countries smallest meat product when we could grow profitable and above average crops of wheat and barley?

There have been many refusals for solar projects by the planning inspector mostly for projects under 50MW as the larger NSIPS are a relatively new thing. Many of these have been refused on appeal by the planning inspector on "the harmful impacts to the character and appearance of the area". I have requested a freedom of information request regarding the number of solar farms refused on appeal, this was on 20th Feb this year but as yet have not had a reply. Ticket number 29329

Here are some of the ones I found online,

#### The planning balance

38. The NPPF sets out a presumption in favour of sustainable development and renewable energy development is central to achieving a sustainable future. This is a relatively large scale scheme which would make a valuable contribution to cutting greenhouse gas emissions and which should attract substantial weight.
39. Set against this there would be a significant adverse effect on the character and appearance of the countryside, some additional adverse cumulative effect when it is seen in association with the nearby wind turbine, and further limited harm to the setting of Berrington which is a Grade II Listed Building to which should be attached considerable importance and weight. The PPG confirms

<sup>1</sup> PPG Paragraph: 013 Reference ID: 5-013-20140306

[www.planningportal.gov.uk/planninginspectorate](http://www.planningportal.gov.uk/planninginspectorate) 7

Appeal Decision APP/W1145/A/14/2212551

#### Overall Planning Balance/Conclusion

51. When all of the above are weighed together, I find that the benefits of the proposal, including the production of energy from a renewable resource and the wider environmental benefits, are insufficient to outweigh the totality of the harmful impacts to the character and appearance of the area and to the

<sup>10</sup> APP/K1128/A/13/2206258 and APP/E2530/A/14/2218270.

**C** <https://www.gov.uk/planning-inspectorate> 9

41

4

Appeal Decision APP/D1265/W/19/3241953

significance of various designated and non-designated heritage assets. This in turn leads me to find that the development would be an inappropriately sited renewable energy scheme (mainly because of what is proposed in F3) that conflicts with the provisions of LP policies 3 and 22. The adverse impacts of the development could not be made acceptable and the proposal also conflicts with the Government's objectives for renewable and low carbon development.

52. Having regard to all other matters raised, I conclude that the appeal should not succeed.

unacceptable harm to local residents.

#### Conclusion

24. The proposal would make a valuable contribution to the cutting of greenhouse gas emissions. It would also assist in securing the ongoing viability of the farm enterprise. However, it would cause substantial harm to the character and appearance of the surrounding landscape. Notwithstanding my findings in respect of heritage assets, I consider that this harm would significantly and demonstrably outweigh the benefits. The proposal does not satisfy the environmental dimension to sustainable development and would not comprise sustainable development.
25. I have considered all the other matters raised, but have not found anything to alter my conclusions on the main issues which lead me to dismiss the appeal.

*Rebecca Phillips*  
INSPECTOR

However, decision making by the Planning Inspectorate between 2012 and now was more weighted to smaller solar sites; 10MW average size in the past, compared to 60MW today. And when the main reason for site refusal is nearly always based on 'detrimental visual impact on landscape', one might assume that the legacy 44% success rate is unlikely to be retained.

I strongly believe that the above and many more that have been refused on the visual and harm to landscape and character of an area create a **PRECEDENT** in law that should be followed or used to challenge any decision in favour of development in such cases.

Colin Davie, the executive councillor for environment and strategic planning at the county council said: "Lincolnshire plays a key role in feeding the nation and for future

#### 6. Alternative Sites

food security, so we would certainly not want to see agricultural land of any grade used in this way. The NPPF states that where possible renewable energy developments should be placed on brownfield sites or sites other than farmland (alternative sites), the developer states there are no "alternative sites". This is not true there are 250,000 ha of commercial rooftop in the country (BER own figures), this may not all be in the one place or enable the developer to make large amounts of money, but in effect would produce an energy source that is decentralized and use where it is produced, rather than waiting for grid connections or digging up half the countryside to make them.

*Responding to a consultation, the charity said: "CPRE Norfolk fully acknowledges and supports the need for solar energy generation, but this should not be sited on food-producing, attractive countryside.*

*"In particular, research shows there are 250,000ha of existing south-facing commercial roof space in the UK, sufficient to provide approximately 50% of our energy needs.*

*"In addition, other suitable brownfield and domestic sites are much more appropriate locations for solar energy generation than productive and attractive agricultural land."*

#### 6. Misrepresentation of facts

The developer states that the project "Could produce enough electricity for 144,000 homes, replace 24% of the existing coal fired power stations generation capacity and deliver electricity cheaper than fossil fuels".

The word could is crucial, these statements are based on the installed capacity of the project which would be 480Mw in actual fact solar in this country on average generates between 8 and 12% of installed capacity.

So at say 10%

That would be an average per hr of 48Mw and only provide power for 14,400 homes, 2.4% of the existing generation capacity of the existing coal fired power station

I believe over the life cycle of the solar plant verses the lifecycle of the coal fired plant it would not provide cheaper electricity, further more although this project may not be directly subsidised by a feed in tariff. Once connected to the National Grid they have to guarantee to be able to take and pay for the electricity generated, the Grid is hugely difficult to balance and renewable energy extremely unreliable in terms of continuity, this means that in reality there are large time spans when renewable energy plants are being paid for electricity that is not able to be used due to having to balance the grid.

Furthermore this site has battery storage, you might think that's a good thing and it could be (in the right hands), however in reality the developer wants to install this to enable them to store electricity when it is produced in the daytime (when no one is at home or using much) and the price they get paid is low, then sell at in the evening at peak periods when the price is very high maybe treble or more. This over the lifetime of the project will more than double the developers profit.

### **Specific Points about West Burtons Proposal.**

**Firstly, there was only a minor substation proposed within the WB 3 site, it has now grown to a full blown plant and worse a battery storage area tripling in size. This is a material change and as such needs a completely new consultation period.13.5 m high**

The proposed substation is no more than 300 meters away from Marton. Considering the danger of lithium batteries which would be stored in the facility, this would constitute a major and unacceptable risk to life in the event of a not - uncommon fire.

The original proposal stated that :-

*The West Burton Substation Site will contain the energy storage and main 400kV substation. This is located to the north west of West Burton Power Station, the location of the grid connection point.*



This is where any large and hazardous equipment should be, in or close to the existing power

station where it can be more easily monitored, controlled and mitigated, also where should anything go wrong it is further away from the general public and there are more facilities on hand to deal with a disaster like a lithium battery fire.

The information given in the additional documentation released regarding battery storage is very generic and continually states that the *“the Applicant will take into account the latest good practices for battery fire detection and prevention, along with the emergency response plan, as guidance continues to develop in the UK and around the world”*.

The literature in this regard is ever increasing and it is horrifying to even imagine what would happen to the residents for miles away, not to mention to the surrounding polluted water.

Battery safety is a major issue !

Furthermore, during the proposed 40 year lifecycle of the battery storage it is likely that a fire will occur. Lithium batteries are highly unstable, there have been a number fires in in battery storage units in the UK already (Liverpool for one), fires from lithium car batteries, fires from lithium phone batteries in fact anywhere there is a lithium battery there is a high chance of a fire, including in one of the main manufacturers factory in Switzerland.

In Arizona there was a 2mW batter storage facility that caught fire, flame came out horizontally and reached up to 25m, it took days to put out, millions of gallons of water, it released toxic gases which are fatal to human health ( Hydrogen Fluoride, Carbon Monoxide, Hydrogen Cyanide and Toluene and more). Eight fire fighters suffered life changing injuries! This was 2MW the proposed storage at West Burton 3 is 10 x the size and located within 350m of Marton Village, the plant in Arizona was in the desert!

One of Lincolnshire Fire and rescue recommendations is :-

*“Ensuring the BESS is located away from residential areas. Prevailing wind directions should be factored into the location of the BESS to minimise the impact of a fire involving lithium-ion batteries due to the toxic fumes produced”*

If the worst were to happen and sometimes it does Marton village and school is only 3 or 400m away, this is way too close for the potential lethal gases that would be released.

There are very many other aspects of the proposals I object to , like, the unacceptable height of the substation, it has now trebled in height, the literature states :-

*The full assessment of landscape and visual effects is not known at this stage, however in, PEIR Appendices 8.2 (Landscape Character Tables) and 8.3 (Viewpoint Analysis Tables) the possibility of potential significant effects are identified. 6.4 Mitigation Measures and Residual Effects 6.4.1 A range of mitigation measures are set out in the PEIR which can be utilised for the Scheme as the design progresses. Measures which are proposed include: • Careful consideration of the siting of the Scheme within the landscape;*

Along with some minimal planting schemes.

The proposed substation will be visible for miles around, yes we have two power stations on the skyline (these are actually due to be demolished) but does that mean the situation should be made worse? They should be put in the original proposed location at west burton.

The so called “Viewpoint analysis” is a bit of a joke, it is done by the roadside at about 1m to 1.2m above ground level, in what seems to be most cases close to or even in between existing hedgerows from the side of the road and generally at the low point of the stretch of road in question. It takes no account of the undulating landscape and the fact that nearly all houses in the

area are as high above the road as possible due to the flood risk. As an example, my property is a good 4m ground level above the viewpoint, which is at the end of my drive, thus the viewpoints do not give a representation of what 10,000 acres of glass and metal will look like from peoples homes, or even people walking or driving unless they are in a sports car.

### **Chapter 10: Hydrology, Flood Risk and Drainage**

They state :-

*“linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the edge of the solar array areas should in general provide sufficient treatment as well as the attenuation required to maintain existing runoff rates.”*

Most of the proposed area is in or very close to existing flood one, flood issues are already a large and relatively frequent problem, in the 20 years I have lived major floods have happened multiple times.

The run-off increase from this and other schemes proposed locally which amounts to around 10,000 acres would be millions and millions of gallons which will run off very, very quickly causing many, many more instances of flash flooding. This is an industrial scheme and as such the surface water run off should be treated as it would be by building control, this would entail a full SUDs report which would require tens probably hundreds of acres of attenuation. There is none shown in the plan.

The proposal states that :-

*No significant potential sources of contamination have been identified as part of the baseline assessment, and the risks to human receptors (construction workers, future Site users and adjacent Site users) and controlled waters are considered to be very low*

The risk of contamination to watercourse is high during the construction and decommissioning stages, construction is a notoriously messy business and creates huge amounts of mud and silt run-off especially on the local clay soil. There are no apparent plans for any temporary SUDs controls. The risk from a fire at the battery storage plant is extremely significant and one you appear to have overlooked, it would take millions of gallons of water to put out such a fire and all that water would then be highly toxic and contaminated! ( it turns into a concentrated acid that will eat through concrete and steel). It would run off eventually into the Trent where it would kill all wildlife and contaminate Anglian Water protected water source.

Noise :-

#### **13.3 Mitigation Measures and Residual Effects**

This section only gives mitigation for the construction and decommissioning stage, it doesn't mention noise from substation or dc ac convertors among arrays. The proposed substation will emit a constant high level hum, it has now gone from 132 Kva to 400 kva this will have effects harmful to mental health for local residents, it should be located at west burton power station.

#### **14.1 Glint & Glare**

*14.3.1 The resulting significance of effect would be moderate and significant.*

*14.3.3 The resulting significance of effect would be moderate and significant.*

*14.3.6 The resulting significance of effect would be moderate and significant.*

All three sections, road residential and air describe the effects of glare as moderate and significant, which in certainly the case of road and air could easily mean fatal! Your mitigation measures as



described below are totally inadequate or unrealistic, how you can mitigate for air I don't know and to screen for road users using plants will take years, what about the risks in the meantime! There could be many accidents or deaths in that time. I also think it is unrealistic to ask residents to wait years before these significant issues are resolved.

You don't even mention walkers, walking in the countryside is a human right and we have a right to enjoy it, if we have to walk around squinting or maybe even tripping over because we can't see that is not acceptable, your survey does not even take this into account.

#### **4.4 Mitigation Measures and Residual Effects**

*14.4.1 Any moderate impact upon aviation operations **will have to be mitigated**. Any predicted impacts towards the ground-based infrastructure can likely be solved with relatively simple mitigation strategies – the most **common being the provision of screening at the site perimeter** to obstruct views of potentially reflecting panels.*

I'm not sure how mitigation for aircraft can be implemented but screening for road users and residents is not really a practical option assuming it will be by planting trees/hedges, hedge plants generally come from 300mm to 900mm as thin whips and take at least 10 years to establish anything meaningful in terms of screening and probably **never will screen an array of solar panels 4.5m high**. Trees even if planted a couple of m tall will take around 20 years to mature into anything significant, half the life of the solar plant.

#### **15.2.7 In respect of a potential fire incident.**

*A fire could be taking place anywhere within the Site and it would be a short period before being extinguished, therefore, a set of generic receptor locations has been defined to assess the potential fire impacts on Preliminary Environmental Information Report: Non-Technical Summary June 2022 47 | Page the fire downwind locations*

They state *"it would be a short period before the fire could be extinguished,"* this would in reality depend on what type of fire it was, where it was and if it set alight to anything else. It could be a diesel storage fuel fire or construction materials or a large item of plant, all these fires would be difficult to put out, cause toxic fumes and easily be in a place where the fire service can't or can't easily get to and have very limited amounts of water.

You also do not yet again mention the possibility of a Lithium battery fire, these are most likely to happen during construction and take days to put out only to reignite days later, there is much literature available on this and I would have thought it a risk that should have been taken account of in your assessment.

They also state:-

***Health and Safety on-site would be managed by the contractor during construction and decommissioning to mitigate the risk of fire.***

That is true but it is your responsibility as developer make sure it happens and more so to point out any risks, fire or otherwise in your Pre Health and Safety Plan, the risk of fire or fire from lithium batteries is not even mentioned. **This is a material fact and either you are deliberately hiding or ignoring the issue as it is a risk as yet no one has a solution to!**

#### **Labour**

*16.2.5 The district council's Local Plan and Five-Year Land Supply documents demonstrate that the Local Impact Area has a significant housing supply and thus has limited issues with accommodating additional workers*

This would seem to intimate that there would be a large influx of workers, in fact the report states

around 400 per day, these workers will need to be specifically trained and qualified, so it is likely that they will be workers not from an area with low employment and high levels of agricultural employment as your report states.

They then go on to say that the scheme will have long term and lasting benefits for the local economy and labour force – “moderate to minor” and in fact describe it as a significant effect, this would seem contradictory and in my experience the earlier intimations of your statement are likely to be true in that by far the greater part of the workforce will be from further away than the local area.

**16.3.6** *The ongoing economic impact of the Scheme through its operational phase is assessed to be moderate long-term beneficial as a result of direct and indirect employment, an uplift in GVA, and continues sector-based skills training and qualifications opportunities. This is therefore a significant effect.*

The amount of labour to maintain the facilities once in operation will be minute and much of it remote, no staff will be permanently resident on the site.

In terms of farming your 1000ha plus along with the other proposed solar schemes in the area will take around 10,000 acres out of agricultural production for 50 years at least (for once the schemes and infrastructure is in, it will likely stay in). This will decimate not only as you state the, “higher than average local agricultural labour force” but will have a much wider impact on suppliers of seed, fertilizer, agricultural machinery, engineers, fuel suppliers, builders, fencing contractors, and many, many more. In fact by the time if it comes when the land is put back to agricultural production many of these farmers and co trades will have disappeared.

**This can only be seen as a significant adverse effect.**

**16.3.4** *The construction of the Scheme will give rise to the loss of some Best and Most Versatile (BMV) agricultural land. Whilst this is considered to be a potential major adverse impact for the lifetime of the Scheme (and thus is a significant environmental effect) it is temporary and has the potential to be reversible. Furthermore, the construction of the Scheme could impact soil quality through soil compaction and damage, which is assessed to have a moderate adverse impact*

## **Tourism**

**16.2.10** *The Local Impact Area sits within the wider context of the Nottinghamshire and Greater Lincolnshire strategic tourism areas. Prior to the coronavirus pandemic, the tourism economy across these areas was estimated to be worth*

**£4.1 billion, supporting 45,000 jobs.** *The Local Impact Area host a number of key attractions, such as: Pilgrims Gallery, Clumber Park, Sundown Adventureland, the Harley Gallery Preliminary Environmental Information Report: Non-Technical Summary June 2022 50 | Page at the Welbeck Estate, the Hemswell Antiques Centre (the largest in Europe), RAF Scampton Heritage Centre, Woodside Wildlife Park, and the Blyton Park motorsports venue.*

Not to mention Lincolnshire Showground, Newark Showground, Lincoln Cathedral, The city of Lincoln and much more including Riseholme Agricultural College.

**16.2.11** *The Local Impact Area hosts a number of local recreation centres, including outdoor venues such as golf courses and fishing lakes and waterways. The areas immediately surrounding the Scheme host a good network of Public Rights of Way, including some of national and regional importance. These include the Trent Valley Way, Cuckoo Way, and Plogsland Round walking routes, and the National Byways cycle route. The River Trent and Fosdyke Navigation Canal waterways are both used for recreational use.*

*The Scheme is assessed to have a **minor adverse impact on the tourism and recreation economy** due to impacts on visual attractiveness and accessibility to tourist attractions and recreational venues, therefore, this is **considered to be not significant**.*

These schemes combined have the potential to decimate the local rural tourism economy and billions of pounds that go along with it, look at the attached pdf for an idea of the impact. As previously stated the so called "Viewpoint Analysis" does not represent what will actually be seen from much of the county.

#### **Waste**

This scheme is based on saving carbon emissions and sustain a clean environment, as such there should be a "**whole life cycle analysis**" covering all aspects of consumption and waste but in particular cO2 use and saving, how much cO2 does it take to mine the material for the panels, to make the panels, to transport them, to construct and decommission the site and finally to dispose of them.

This should also apply to the storage batteries, Lithium Iron is a rare earth metal and requires a lot of energy to mine, manufacture and also **cannot be recycled!**

They are trying to sneak in an application for battery storage which should be subject to a separate application and are omitting strategic information absolutely vital for the residents to be consulted on, I will press the local council, my MP and all interested parties to oppose this reckless and unscrupulous plans.

**Yours Sincerely**

**John Jones**

**A very concerned resident.**