

7000Acres Summary of Oral Submissions

Issue Specific Hearing Four

5th December 2023

This is a summary of comments on the submissions made during ISH 4, 6 December 2023.

Interrelationship Report

7000Acres considers that the OneEarth, Stow Park and Steeple solar developments should be considered as part of the cumulative assessment.

The Home Office has won the High Court case to use RAF Scampton to house 2,000 illegal immigrants. The cumulative assessment must take into account the impact on local health and social resources of these 2,000 people, along with the 2,000 itinerant workers involved in building the various solar schemes. The West Lindsay health and social care provisions are already stretched to breaking point without the extra burden of supporting an additional 4,000 (circa 10% of the local population) people.

Cumulative Impact

7000Acres believes that the cumulative impact from the 6 solar schemes has not been assessed adequately. The Applicant appears to ignore cumulative effects but instead uses a test of concurrent effect, i.e. can one be affected by 2 schemes at the same time. It does not take account of travelling through the area where sequential impacts will occur as schemes are viewed in turn. Additionally, it does not take sufficient account of viewing the Trent Valley from higher ground.

Applicant's Use of Professional Judgement

7000Acres has previously raised concerns over the Applicant using "Professional Judgement" rather than providing sound evidence to support their case. Our concerns previously submitted include the Applicants Glint and Glare Assessment (Chapter 16) and the methodology used to assess Climate Change (Applicant's Chapter 7). In both these cases Professional Judgement was used in place of reliable evidence.

7000Acres agrees with the points raised by LCC and WLDC (e.g. WLDS at transcript time 00:40:50:03) over their concerns regarding the Applicant's Professional Judgement on several topics being an outlier compared to the Councils' experts, and also outliers on some

topics to the opinions submitted by other solar schemes. As the Applicant's submissions, based on Professional Judgment, are outliers, 7000Acres believes that the ExA should prefer the Councils' evidence.

Examples of the Applicant's Use of Professional Judgement

A key feature of the NSIP process is that it is "front loaded" (<https://commonslibrary.parliament.uk/research-briefings/sn06881/>). The Applicant should have submitted a coherent plan for their project but it still lacks evidence and clarity, often glossing over detail with opinions based solely or largely on Professional Judgement.

For example, the Applicant claims a major beneficial cumulative effect to climate change. This is based on their calculations that the scheme's annual electrical generation will be 945,000 MWh. This is disputed by a Chartered Electrical Engineer who is part of the 7000Acres group.

At a roughly 11% load factor for solar in the UK, this would imply an installed capacity, without any constraint on the export grid capacity, of around 980MW.

Clearly, the publicity material for Cottam is for a 600MW scheme, and based upon that figure, the likely year 1 generation would be 580,000MWh. On this basis, the Applicant has used an output figure that is 60% higher than the capacity indicated in their consultation material. Overplanting might explain some of this excess generation but EN-3 3.10.46 does not allow overplanted solar panels to generate until existing panels have degraded (EN-3 footnote 84).

Another example is the Applicant's Greenhouse Gas saving calculations. They have not used current market data but merely assumed that 50% of solar panels and batteries will come from China and the rest from Europe. The current reality is that nearly all solar panels and utility scale batteries are sourced from China, so this reasonable worst case assessment should be applied. The Applicant has not undertaken a study to identify the regional impact of extending the project by 50% from 40 to 60 years, merely relied on Professional Judgement without supporting evidence.

Professional Judgement is also used in the Applicant's Glint and Glare assessment to dismiss any harm, whilst not providing supporting evidence on the intensity of glare (required in EN-3 3.10.95). Yet another example is the Applicant's claim that covering the area in 4.5m high solar panels will have significant beneficial effects (LVIA Table 8.69) which is an outlier when compared to the evidence provided by the Councils' experts.

Human Health

7000Acres requests that Human Health is considered in a separate Environmental Statement chapter, where the cumulative effects of the scheme on health can be addressed in one place. At present the details are dealt with, insufficiently in our opinion, in each chapter but the total effect is often greater than the sum of the parts. We will make a written submission explaining why we believe an ISH on Human Health and Wellbeing is a necessary part of this examination process.

Granting of a Development Consent Order

7000Acres agrees with the Councils and the Applicant that if the cumulative effects of all the schemes combined, is unacceptable, then none of the schemes should be consented (ISH 4 part 2 transcript time 00:31:17:06). As there are now 6 solar NSIPs located in the immediate area, then all 6 schemes must be part of this cumulative assessment.