

7000Acres

Summary of Oral Submissions ISH 5 – 8 December 2023

Deadline 3 – December 2023

1. Introduction

This is a summary of oral submissions by the 7000 Acres representative at ISH 5, 8 December 2023.

2. Review of Significant Effects at 60 Years

After the public consultation was completed, the Applicant chose to increase the operating period for the scheme by 50%, from 40 years to 60 years. 7000Acres notes that the updated EN-3.10.140 states that *“an upper limit of 40 years is typical”*.

The original Environmental Statement submitted and assessed by Interested Parties was based on a 40 year time span. The Applicant submitted in November 2023 a document titled: Review of Likely Significant Effects at 60 Years: Environmental Statement Review Prepared by: Lanpro Services Document reference: EX2/C8.2.7 .

This later document summarises any implications on extending the life of the scheme by 50%. 7000Acres agreed with WLDC that increasing the life of the scheme would compound many of the adverse effects already identified by Interested Parties. Chapters where errors and concerns have already been identified include: Chapter 7, climate change; Chapter 8, LVIA; Chapter 9, ecology and biodiversity; Chapter 10, flood risk; Chapter 13, cultural heritage; Chapter 15, noise; Chapter 16, glint and glare; Chapter 18, socio economics tourism and recreation; Chapter 19, soils. Insufficient information has been provided in the Review of Likely Significant Effects at 60 Years: Environmental Statement Review to explain why it should override the conclusion made in the original ES chapters. Once again, the Applicant seems to have relied on Professional Judgement rather than presenting quantitative information.

2.1 Example – Chapter 7

As an example, 7000Acres has concerns over the original Chapter 7 because many of the assumptions applied were *“optimistic”* and were not a reasonable worst case, as required under a Rochdale Envelope (Advice Notice Nine). For example, the Applicant assumes that 50% of the infrastructure will be sourced in Europe and 50% in China, whilst the main provider of industrial solar panels and batteries is currently China, so their 50:50 assumption is wrong. The Likely Significant Effects at 60 Years: Environmental Statement Review, page 6 states that over the 60 year life of the scheme 24% of the panels would require replacement, so 76% of the panels will last for 60 years.

There is no evidence that solar panels will last for 60 years, so the Applicant has not based their assessment on a reasonable worst case assumption.

In Chapter 7.2.7 the Applicant originally assumed the batteries will be replaced once over the 40 year life of the scheme. The Likely Significant Effects Document claims that the batteries will not need replacing during the additional 20 year life of the scheme. That means the life of the batteries will need to be at least 30 years. Current evidence is that BESS battery life is based on the number of recharging cycles, not time. A BESS engaged in energy arbitrage, which is the primary purpose of the Cottam BESS, will require a large number of recharging cycles; current evidence shows the life of a BESS battery is approximately 10 years¹, although frequently less.

In summary, the Applicant has seriously underestimated the greenhouse gas emissions for this scheme both during the build phase and during the maintenance of its operation. This is merely one example of how the Applicant has not made a reasonable worst case assessment of the implications of extending the life of the scheme from 40 years to 60 years.

7000Acres believes that either Chapter 7 should be updated to make a reasonable worst case calculation of the greenhouse gases generated during the life of the scheme, or the life of the scheme should be limited to the life of a single set of solar panels. A similar process should be applied to the other ES chapters.

3. Applicant's Use of a Rochdale Envelope

7000Acres accepts that a Rochdale Envelope is required for schemes such as the Cottam NSIP. However, an Applicant using a Rochdale Envelope has a number of requirements placed on them. In particular, Advice Notice Nine paragraph 1.4 requires a consistency across the application documents.

The Applicant's documentation is not consistent between the dDCO and the ES, for example the LVIA assumes a limited number of hedges will be removed whilst the dDCO permits all the hedges in the scheme to be removed. The Battery Storage Safety Management Plan is now different to the outline design shown in the dDCO. The glint and glare assessment makes use of "opaque fencing" as a

¹ [Energies | Free Full-Text | Life Evaluation of Battery Energy System for Frequency Regulation Using Wear Density Function](#)

mitigation, this is not discussed anywhere else in the ES. When a reader looks at different chapters of the ES, or the dDCO, they will get different versions of the Applicant's assessment, this is unacceptable.

The NSIP process should be "front loaded" with the Applicant coming to Examination with a clear and coherent plan. This is not the case for the Cottam NSIP Application, the Applicant has not presented a clear and consistent case.