

7000 Acres Response to the Examining Authority's Second Set of Written Questions

Cottam, Deadline 4 Submission – January 30th 2024

1. The Draft Development Consent Order and other consents		
ExQ	Question	7000Acres Response
2.1.10	<p>Requirement 9 (BNG)</p> <p>At ISH5, the Applicant explained that the specific percentages of BNG identified in the ES were not secured in the dDCO and should not be relied on by the SoS in the planning balance.</p> <p>However, at action point 6 of ISH2, the Applicant draws attention to section 4.6 of its Planning Statement which sets out the benefits of the scheme the Applicant considers should be attributed significant weight in the planning balance, including ‘a significant net gain for biodiversity, with 96.09% gains provided in habitat, 20.22% gains in hedgerow and 10.69% gains in river units’. Please explain why the Applicant considers significant weight should be attributed to BNG where these levels (or any minimum amounts) are not secured in the dDCO.</p>	<p>This is a typical example of where the Applicant makes claims for the benefits of the scheme without providing any supporting evidence.</p> <p>Credit should only be given for items secured in the dDCO, or other documents that will allow the Applicant to be held to account.</p>
2.1.13	<p>Requirement 21 (Decommissioning and Restoration)</p> <p>Please explain why WLDC considers Requirement 21 should include a trigger mechanism for decommissioning in the event that the Proposed Development ceases to generate electricity for a period of 12 months. Please provide any suggested wording.</p>	<p>Due to improvements in technology, it is highly probable that ground mounted solar panels will be rendered obsolescent in a few years, and certainly well before the 40/60 years sought by the dDCO.</p> <p>Unless there was a trigger mechanism, the solar generation scheme could cease to operate and fall into disrepair but the Applicant/Operator would not be obliged to decommission the scheme until the 40/60 year period expired.</p>

2. General and cross topic matters		
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2.2.2	The Revised National Planning Policy Framework (NPPF) was published in December 2023. Comments are invited from all parties on its implications for the consideration of the Proposed Development.	<p>National Planning Policy Framework</p> <p>The National Planning Policy Framework was updated in December 2023. It is relevant to this Application as it addresses sustainable development in a holistic manner. It states three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways.</p> <p><i>1. “An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”</i></p> <p>The key element is the “land of the right types”, so that solar is installed on rooftops and brownfield sites, whilst productive farmland can be used for food production, carbon sequestration and the production of biofuels. This scheme, and the five other solar NSIPs in the area will remove 15,000 acres of productive farmland for up to 60 years.</p> <p><i>2. “A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect</i></p>

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		<p><i>current and future needs and support communities' health, social and cultural well-being;"</i></p> <p>As demonstrated in the submissions by the County and District Councils, as well as numerous Interested Parties, the Cottam Solar industrial complex will have a devastating impact on the local population's wellbeing. The outcome of this scheme will have an exponential impact on health and well-being when the cumulative influence of the other five solar industrial schemes is fully considered.</p> <p>3. "An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."</p> <p>This requires "<i>effective use of land...and using natural resources prudently</i>". Covering thousands of acres of productive farmland in solar panels and batteries is not productive use of land. The Cottam Solar application does not meet any of these 3 objectives stipulated in the NPPF.</p>
2.2.6	Please explain whether the continuing use of solar panels and batteries after their average lifespan of 40 years is likely to result in an increased failure rate. If so,	Solar Panels: The Applicant has claimed a solar panel failure rate of 0.4% per annum.

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	<p>please explain how this has been taken into account in the assessments presented in the ES.</p>	<p>There is no evidence presented that supports this linear failure rate. Typically, the failure rate will follow a “bath tub” trajectory, with an initial failure rate being relatively high due to manufacturing faults, damage during transit and installation faults. The failure rate will then decrease for a number of years. Finally, the failure rate will increase at an accelerating rate as the solar panels wear out. Common failure modes are junction box failure, glass breakage, defective cell interconnect, loose frame, and delamination. Applying the Applicant’s linear failure rate, 60% of the solar panels are predicted to last for 100 years!</p> <p>Solar panels typically suffer a 0.5% reduction in generating capacity per annum, so the scheme could expect to produce 30% less energy after 60 years. This leads to the economic life of the panels being shorter than the physical life of the panels. Recent research (Economic Lifetimes of Solar Panels Manbir Sodhia*, Lennart Banaszeka , Chris Mageeb , Mercedes Rivero-Hudecc 29th CIRP Life Cycle Engineering Conference 2022) identifies that the economic life of solar panels is frequently less than 20 years, with legacy panels being replaced by newer technology.</p> <p>The Applicant has not made a reasonable worst case assessment (Advice Notice Nine) and assumed that some panels will be replaced before the 60 year period on economic grounds. Therefore, the green house gas emissions savings stated by the Applicant are an overestimation. Furthermore, the early replacement of panels could lead to tsunami of solar panel waste before a suitable recycling system is developed in Lincolnshire.</p>

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		<p>7000Acres considers:</p> <ul style="list-style-type: none"> • the Applicant should apply an evidence based failure rate, rather than a linear rate; • secondly, the Applicant must state if panels will only be replaced at the end of their physical life or if they will replace panels for economic reasons. If the former, it should be secured in the dDCO under Principal Power 5 Power to maintain the authorised development. If the latter, the Applicant should update their GHG emission calculations to take account of more frequent solar panel replacement. <p>Batteries</p> <p>The Applicant's ES Chapter 7 assumed a BESS battery life of 20 years. This is less than evidence shows, with a typical BESS battery life of circa 10 years (Life Evaluation of Battery Energy System for Frequency Regulation Using Wear Density Function Park et al, Energies 2022).</p> <p>Once again, the Applicant has not applied a reasonable worse case assessment (Advice Notice Nine) and made a claim of battery life without any supporting evidence. This leads to a gross overestimation of environmental benefits of the scheme.</p>
2.2.7	Why does 7000 Acres consider that the Proposed Development would undermine the Local Industrial	The Local Industrial Strategy (LIS) (2021) includes 6 main dimensions, Agrifood, Energy, Ports and Logistics, Defence, Health and Care, as well as Visitor Economy. Large scale ground mounted

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	<p>Strategy (2021) as is set out in its response to ExQ1.2.9 [REP2-094]?</p>	<p>solar development has the potential to impact the Agrifood, Energy and Visitor dimensions in particular.</p> <p>In terms of Agrifood, the ambition is to “become the UK’s Food Valley and contribute to the UK’s reliance on food imports.” The sector contributes 18% of Lincolnshire’s GVA (in comparison with 3% nationally), therefore this is an important sector that the region can ill afford to neglect.</p> <p>With regard to Energy, the focus of the region is on supporting the development of offshore wind as well as carbon capture and storage to support decarbonisation of gas infrastructure. Solar is considered briefly in terms of localised generation along with anaerobic digestion. Solar development at the scale of CSP or any other NSIP scheme is not envisaged.</p> <p>Regarding the Visitor Economy, the aspiration is to “develop the tourism sector levelling up and supporting some of the more deprived parts of the region by providing higher-quality and more reliable employment for workers”. Within the ES, the Applicant acknowledges the contribution West Lindsey made to the visitor economy, acknowledging the area already has limited attractions, with the “main attraction being focussed on heritage, aviation, environment and landscape”. Considering this, the ES states “The potential changes to landscape views, both temporarily from construction equipment and longer-term from the installation of the Scheme infrastructure, and the impacts from construction traffic impacting the desirability and accessibility of tourism and</p>

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		<p>recreation routes and centres, both could negatively impact the prosperity of the local tourism economy.” It is clear that the large-scale development of ground mounted solar will only erode the attractiveness of environment and landscape.</p> <p>Considering these three together, it would be logical to conclude that the industrialisation of an area (or multiple areas) of Lincolnshire through extensive deployment of large-scale ground mounted solar would serve to undermine the Agrifood ambitions of the LIS as well as the appeal for visitors and the ambition to improve areas of deprivation through the stimulation of the Visitor Economy.</p>

3. The needs case, electricity generated and climate change		
ExQ	Question	7000Acres Response
2.3.1	<p>On 22 November 2023, the Department for Energy Security and Net Zero published an updated version of the draft National Policy Statements (NPS) for Energy (EN-1 to EN-5) which contain some changes to elements regarding the decision-making process for low carbon generation applications in general including solar generating stations and related connections. These revised draft Statements have also been laid before Parliament but are not yet designated for the purposes of s104 of the Planning Act 2008.</p> <p>Do any parties have any comments on the potential effect of changes in the November 2023 versions of the revised draft Energy NPS on matters related to this application, compared to the March 2023 versions of the Energy National Policy Statements?'</p>	<p>REP3-064 covers this answer in more detail, (7000 Acres Supplement to Comments on Applicant’s Response ExA’s Q1, regarding updates to National Policy Statements).</p> <p>In summary:</p> <p>While the 2024 NPS suite is important and relevant, the existing NPS suite applies to the proposed Cottam solar development.</p> <ul style="list-style-type: none"> • There are urgent requirements to overhaul even the 2024 NPS, called for by the Electricity Networks Commissioner, to improve the coordination and planning of electricity infrastructure projects. • The 2011 suite of NPS documents apply to the Cottam examination, as clarified in the 2024 NPS EN-1. • Solar does not feature in the 2011 suite of NPS documents. • The 2011 NPS considers land use, as well as the context of agricultural practices and how they contribute to the character of the environment and local economy. • The 2024 NPS acknowledges the risk of “unnecessary capacity” being built and the need for overall co-ordination in the approach. • A definition of “Critical National Priority” has evolved through the development of the 2024 NPS, and a “watering down” of this definition has rendered it to be effectively meaningless in differentiating priorities.

3. The needs case, electricity generated and climate change		
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		<ul style="list-style-type: none"> • Consistent principles of “good design” remain, in terms of efficient use of natural resources, including land use, sensitivity to the landscape infrastructure sits within, as well as the functionality of the development. The Cottam project uses a significant area of land, is not sensitive to the landscape and can only provide limited benefits in terms of energy and decarbonisation – as has been set out in 7000Acres WR REP-117. • The NPS also continues to require alternatives to be considered in terms of whether there is a realistic prospect of an alternative delivering the same capacity, within the same timescale. • In fact, there are other ways of deploying such capacity of solar power, without having such impacts through using large-scale ground mounted solar, e.g. through rooftops. • The 2024 NPS suite calls for efficient “use of natural resources, including land-use”, and provides a clear hierarchy for the types of land to be used, and that the need to use agricultural must be demonstrated, before considering Agricultural Land Classification. The Applicant has focused solely on ALC. • • The 2024 NPS EN-3 considers a “typical” solar farm, being 50MW, and between 125 and 200 acres. The scale of the Cottam scheme is 10x this size, or even greater, through overplanting
2.3.2	Action Point 2 of the Written Summary of the Applicant’s Oral Submissions and Responses at ISH5 [REP3-038] states that a panel failure rate of 0.4% has been applied “ <i>in line with industry standards</i> ” to the climate change assessment of operational impacts from panel failure/replacement. Table 1.1 of the ‘Review of Likely	<p>Please see our answer to Question 2.2.6.</p> <p>The Applicant has not provided any evidence for a failure rate of 0.4% per annum, which assumes 60% of the panels will last for 100 years.</p>

3. The needs case, electricity generated and climate change		
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	Significant Effects at 60 Years: Environmental Statement Review' [REP2-058] states that over a 60-year operational lifespan 24% of the panels would be replaced. However, the Applicant states [REP2-048] that solar panels have an “average lifespan of 40 years” suggesting a 100% replacement rate at 40 years. Can the Applicant explain this discrepancy?	7000Acres considers a linear failure rate is not appropriate, and an evidence based failure rate should be supplied by the Applicant.

4. Other projects/cumulative effects		
ExQ	Question	7000Acres Response
2.4.1	The ExA notes the Applicant's post hearing note at ISH4 [REP3-035] in respect of the scoping report for the Stow Park solar project. Please provide an update including whether this new information affects the Applicant's conclusions on the assessment of cumulative effects.	<p>It is noted that the Stow Park solar farm has deployed sensitive design and good practice that has not been a feature of the proposed Cottam scheme, in particular:</p> <ul style="list-style-type: none"> • Panel height selected at 2-2.5m is around half the height of those proposed by the Applicant for the Cottam Solar Project. This serves to reduce the visual and landscape impacts of the scheme. • Stow Park has chosen to connect directly to a transmission tower that carries a connection through the development, thereby eliminating the need for additional transmission infrastructure. • The scale of Stow Park is large by current UK standards, at 35MW, but remains at a scale that is far more in keeping with the scale of local communities in the region, unlike the Cottam scheme. Stow Park would not, therefore, become the dominant characteristic of the region. • At this capacity, Stow Park could be decided upon by Local Authority planning, and therefore the decision would be made locally, and not imposed on the region, which is in line with the suggested approach in the Skidmore Review.
2.4.2	At ISH4, the Applicant stated that it did not intend to update changes to cumulative impacts in individual aspect chapters, instead preferring to update the Joint Report on Interrelationships with other NSIPs [REP3-027] . Please confirm whether it is the Applicant's	7000Acres accepts that it is reasonable for the Applicant to adopt a Rochdale Envelope. However, the Applicant repeatedly fails to comply with Advice Notice Nine, in this case with paragraph 1.4, which requires:

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	<p>intention that the Joint Report will be a certified document?</p> <p>Notwithstanding the above, the ExA considers that where there are changes to the conclusions reached in the individual aspect chapters of the ES, it is the ES that should be updated and not the Joint Report. The Applicant should ensure that, where necessary, all chapters of the ES contain full and up-to-date information on cumulative effects and where information is contained in other documents that informs the assessment, this should be appropriately cross referenced in the Chapter.</p>	<p><i>“that there is consistency across the application documents including any other relevant environmental assessments (e.g Habitats Regulations Assessment (HRA) or Water Framework Directive (WFD) assessment).”</i></p>

5. Landscape and visual, glint and glare, good design		
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2.5.2	NPS EN-5 is concerned with the long-distance transmission system (400kV and 275kV lines) and the lower voltage distribution system (132kV to 230v lines from transmission substations to the end-user); and associated infrastructure, for example substations and converter stations that facilitate the conversion between direct and alternating current. Please explain the relevance of NPS EN-5 in so far as it relates to the Applicant's conclusion of beneficial landscape effects as highlighted in paragraphs 2.8.3 and 2.8.11 in Appendix 1 of [REP3-033]). For example, is the Applicant suggesting that there is a reconfiguration or rationalising of existing electricity infrastructure?	<p>Much of the focus of EN-5 is specifically related to delivering the infrastructure to deliver offshore wind, and the details of offshore/onshore networks. EN-5 makes explicit reference to the need for infrastructure to deliver offshore wind throughout the document, e.g. in sections 1.1.2, 1.1.3, 2.2.3. 2.7.5.</p> <p>Aside from offshore wind, other generation technologies are bundled together and not highlighted, and are understood to fall within the watered-down definition of "Critical National Priority". This definition originally applied to offshore wind (2023 dNPS), but was fatally weakened down in the final draft to refer to any low-carbon generation and therefore renders any effective prioritisation utterly meaningless. 7000Acres WR REP3-064, Section 3.</p> <p>Nevertheless, in practice the prioritisation is clear; despite the focus of EN-5 being Electricity Networks, wind is mentioned 34 times within 47 pages of the document. Solar is not mentioned once in EN-5.</p> <p>In addition, clear priorities to decarbonise are understood and made explicit through reports from BEIS Committee, National Audit Office, Climate Change Committee and Skidmore, i.e. the need for delivery of Offshore wind and associated infrastructure, managing energy flexibility and overall strategic co-ordination of energy system planning. See also REF 7000Acres REP2-090</p> <p>The Applicant has selected land areas >2km from substation to deploy solar panels, and because of the distance, a high voltage</p>

5. Landscape and visual, glint and glare, good design		
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		<p>transmission line is required, and the Applicant may therefore attempt to argue that technically, their associated network infrastructure should in some way be considered to be in line with EN-5. However, the Applicant has effectively “created their own need” through their preference and selection of scheme design, which is not the same as a genuine “need”. This should not therefore, carry the same weight as electricity network requirements essential to deliver offshore wind, which are the primary focus of EN-5.</p> <p>Fundamentally, the requirement to deploy solar at an HV substation is unnecessary, as described in 7000Acres WR REP-116 Section 4. Notably, the premise of low-voltages for panels and their capacity for connection at low / domestic voltages has not been challenged by the Applicant. Connection of solar at the point of use avoids transmission and distribution losses of typically c. 8%¹. It is clear therefore, that much of the yield increase the Applicant seeks by deploying large 4.5m high tracking solar panels will simply offset the loss incurred by having selected a 400KV transmission substation as the point of connection.</p> <p>In terms of the specific comment made by the Applicant in REP3-033, highlighting the NPS EN-5 (2011 version) comment regarding the potential for landscape benefits to arise through rationalisation of the existing electricity network, it is clear that the</p>

¹ [Summary \(parliament.uk\)](https://www.parliament.uk)

5. Landscape and visual, glint and glare, good design		
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		<p>Applicant is offering no such rationalisation, only an unnecessary extension of HV transmission lines, at a time when there are separate, additional and extensive requirements for such transmission lines elsewhere to connect offshore wind.</p> <p>Of importance when considering EN-5 is the Electricity Networks Commissioner Report (2023), which makes several recommended improvements, notably around creating a Strategic Spatial Energy Plan, i.e. mapping where specific energy provisions will be deployed. The report seeks that the “Energy NPS should be updated again urgently after the current round of changes”. Again, by way of illustration, in the Commissioner’s 12-page covering letter, “wind” is mentioned on 7 occasions. Solar is not mentioned. In the accompanying report, within 15 pages, wind is referred to on 13 occasions, and solar is mentioned once.</p> <p>EN-5 highlights the requirement for “Good Design”, as laid out in EN-1, Section 4.7. See also 7000Acres WR REP3-064, Section 3.</p> <p>“Good design” includes how infrastructure “relates to the landscape it sits within” and that “applying good design to energy projects should produce sustainable infrastructure sensitive to place, including... efficient in the use of natural resources, including land-use”. The scale of the Cottam project and height of panels, in comparison to the local landscape and villages, demonstrates a design that lacks sensitivity to place.</p> <p>Allied to land use, is the subject of the use of agricultural land. The NPS states “Where development of agricultural land is</p>

5. Landscape and visual, glint and glare, good design		
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		<p>demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality” (this principle of a “hierarchy” of preferred land use is further expanded in emerging NPS EN-3). In the case of Cottam, the Applicant has focused entirely on the quality of agricultural land, not demonstrated necessity to use agricultural land.</p> <p>Also, within “Good Design”, the NPS notes the importance of “the functionality of an object – including fitness for purpose and sustainability”. Section 2 of 7000Acres WR REP2-080 (“The role of Solar in Energy Provision and Decarbonisation”) describes the constraints around the functional contribution solar can make to energy and decarbonisation, which are limited to the point where the benefits do not outweigh the harms arising from ground mounted solar installation at such a large scale.</p>
2.5.3	Given the scale of the Proposed Development, please explain (with reasons) whether the Applicant considers the introduction of a significant number of solar panels and other associated infrastructure would become a defining feature of the landscape once operational (e.g. at year 1 and year 15).	<p>At year 1 the defining feature of the landscape would be the 4.5m high solar panels, associated fencing, lighting and transmission equipment. These solar industrial structures will not be screened and so will directly replace the current agricultural landscape.</p> <p>The Applicant’s only mitigation for year 15 is landscape vegetation. To purely rely on landscape planting to obscure views of solar structures and industry means that the landscape and views become enclosed and narrow and planting becomes a defining detrimental characteristic. Conversely, if any of this planting is unsuccessful any claimed benefits will not be achieved. It is therefore apparent that such a proposed development cannot be</p>

5. Landscape and visual, glint and glare, good design		
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		<p>readily assimilated into the landscape as demonstrated by the Applicants own convoluted reasoning and mitigation approach.</p> <p>We also wish to make the following points on the Applicant's byzantine documentation, lack of logic and inconsistencies:</p> <p>AHH Planning Consultants appointed by Lincolnshire County Council, to review the LVIA, state that, 'the LVIA and associated appendices, which while very detailed and extensive, makes the identification and clear understanding of key landscape and visual findings, as well as providing succinct review comments, difficult' and that the document is 'inaccessible to most readers and difficult to follow'. This illustrates the barriers to understanding that residents are experiencing. This failing of the Application material is prejudicial to our members and members of the public in the region.</p> <p>The Applicant has stated that the proposed development will have a negligible or beneficial cumulative impact on the landscape. However, within the Applicant's own documentation they argue the opposite. Paragraph 18.7.112 of the Socio-economic chapters (Doc. Ref. EN010133/APP/C6.2.18) states that the Scheme will 'have a long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets'. This statement from the Applicant undermines their LVIA findings and conversely the LVIA findings undermine the Socio-economic statements as cited.</p>

5. Landscape and visual, glint and glare, good design		
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		<p>7000Acres agrees with the conclusions made in the AHH Planning Consultant’s report:</p> <p>“the industrial development of the landscape will (paragraph 4.11, AHH) bring about an extensive change on land use...and subsequently the openness and perception of solar development: creating what may be perceived as an ‘energy landscape’ as opposed to rural or agricultural one at present, which is a complete change of character.”</p> <p>This contrasts with the Applicant’s consultants who have used “professional judgement” to dismiss any adverse impact in their LVIA, even claiming that 4.5m high solar panels will “enhance” the landscape!</p> <p>The Applicant’s 5km Study Area is based on the visibility of the Scheme. Due to the existence of multiple sites across a large geographical area in the West Lindsey District, the visibility of the Scheme as whole covers an expanse of land that means multiples of 5km Study Areas are conjoined. The justification for the 5km limit is given in relation to the existence and retention of a ‘strong framework of hedgerows and tree cover’ (8.4.11) amongst other things. If the Rochdale Envelope is adopted and the Draft DCO approved, then the ‘worst-case’ scenario of the removal of all trees and hedgerows (including TPO’d trees) in the vicinity of and extending beyond the Order Limits, will mean that the parameter of the 5km Study Area radius is fundamentally flawed and that visibility will extend beyond this distance and in turn significantly affect many sensitive receptors across the District. These</p>

5. Landscape and visual, glint and glare, good design		
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		sensitive receptors include Landscape Character Areas, such as the Ridge Area of Greater Landscape Value (AGLV) and Gainsborough AGLV and the historic and internationally important Lincoln Cathedral and Castle.

8. Soils and agriculture		
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2.8.8	<p>The NPPF (December 2023) has been updated to include the following: <i>“The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i> (footnote 62). IPs are invited to comment.</p>	<p>The revised NPPF is consistent with longstanding Government policy.</p> <p>The Secretary of State for Communities and Local Government stated on 25 March 2015: <i>“Last year, the Coalition Government published a comprehensive solar photovoltaic strategy setting out our ambitions for the technology as an important part of the United Kingdom’s energy mix. In doing so, the strategy underlines the importance of focusing growth on domestic and commercial roof space and previously developed land.”</i></p> <p>This statement is consistent with the 2023 Skidmore Review (Skidmore Review paragraph 266²) that calls for a “rooftop revolution”. So in citing the use of domestic and rooftop solar the Government is presenting a long standing and consistent policy.</p> <p>The Secretary of State’s Statement then said: <i>“Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the unnecessary use of high-quality agricultural land. Protecting the global environment is not an excuse to trash the local environment. When we published our new planning guidance in support of the Framework, we set out the particular factors relating to large scale ground mounted solar photovoltaic farms that a local council will</i></p>

² <https://assets.publishing.service.gov.uk/media/63c0299ee90e0771c128965b/mission-zero-independent-review.pdf>

8. Soils and agriculture		
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		<p><i>need to consider. These include making effective use of previously developed land and, where a proposal involves agricultural land, being quite clear this is necessary and that poorer quality land is to be used in preference to land of a higher quality”.</i></p> <p>These principles are consistent with the updated National Planning Policy Framework.</p> <p>7000Acres believes that the loss of agricultural land is a major concern, especially when the cumulative effects of the other five solar NSIPs in the local area are taken into consideration. These will result in the loss of circa 15,000 acres of food producing agricultural land for up to 60 years. The Applicant has not taken any account of the loss of food production, and consequent need to import food, resulting in increased greenhouse emissions. Therefore, the Applicant has not taken account of a reasonable worst case, as required under a Rochdale Envelope.</p> <p>The House of Commons Environmental Audit Committee Report – Environmental change and food security – dated 29 November 2023, strongly supports the need for locally produced food. In particular:</p> <p><i>“We expect the Government to publish its Land Use Framework no later than the last sitting day in December 2023, and recommend that it must fully integrate food security as a central principle. It must evidence how the Government’s goal of improving productivity within existing uses can be achieved without negative environmental impacts; and provide its methodologies for calculating how the objectives of</i></p>

8. Soils and agriculture		
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		<p><i>enhancing food security and meeting the Government’s targets on net zero and biodiversity will be met.</i></p> <p><i>We recommend that the Government should set a target for half of public money spent on food to be produced within the local area or to higher environmental standards; publish national guidance on sustainable diets; and include within the school curriculum science-based education about the environmental impacts of food production. We recommend that the Government designate food security as a public good and incorporate food security and environmental goals more explicitly in the design of Environmental Land Management schemes.</i></p> <p><i>We recommend that the Government publish its priorities for agricultural innovation research and development—referring to the list we compiled from the extensive evidence we received—to provide clarity for researchers, industry, and investors.</i></p> <p>Paragraph 31 (page 20) of the Report is quite telling:</p> <p><i>“Every hectare of arable land that we convert to housing or something and then offshore the food production must be replaced by on average 2.9 hectares of land overseas, which will often be in tropical countries that will, therefore, have a much higher biodiversity impact, sometimes three to four times higher than in the UK”.</i></p> <p>The Cottam NSIP is planned to cover 1,150 hectares of farming land, which would require replacement by 3,335 hectares of farming land overseas. The Applicant’s Chapter 7 has not taken</p>

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		<p>account of the displacement of agricultural land overseas and the consequent biodiversity impact – <i>“typically three or four times higher than the UK.”</i></p> <p>Finally, the Applicant has not taken account of the biofuels already grown in the region. Consequently, the Applicant’s Chapter 7 should address the loss of biofuels in their baseline assessment.</p>

12.Socio-economic, tourism and recreation		
ExQ	Question	7000Acres Response
2.12.2	<p>Paragraph 193 of the NPPF raises matters related to the ‘agent of change’ principle in that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Would this arise in this case in light of the concerns that LNT have set out in its Deadline 2 submission [REP2-085] and during the December hearings?</p>	<p>The Agent of Change principle is also relevant for many other local businesses. For example, leisure and tourism business will be impacted if the West Lindsay rural landscape is transformed into a solar industrial landscape.</p> <p>The NPPF paragraph 193 states: <i>“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”</i></p> <p>In addition to LNT, the Applicant is seeking to impose restriction on current operators of the Cottam Power Station site (WR on behalf of EDF – Deadline 1- dated 17 Oct 23). The decommissioning of the site, National Grid and Uniper assets, as well as the Bassetlaw regeneration plan for the site are all placed at risk by the Applicant’s proposal.</p> <p>The Agent of Change principle must be applied to any local business that will be impacted by the loss of amenity due to a change in the landscape characteristic. So far the Applicant has not offered mitigation to any local business.</p>

12.Socio-economic, tourism and recreation		
ExQ	Question	7000Acres Response
		As an additional comment, the NSIP process is meant to be “front loaded”, with the Applicant coming to examination with a coherent plan for their development. It is clear in this case that the Applicant has not engaged with stakeholders in advance, hoping to evade local scrutiny and opposition by use of the NSIP procedure and CA.