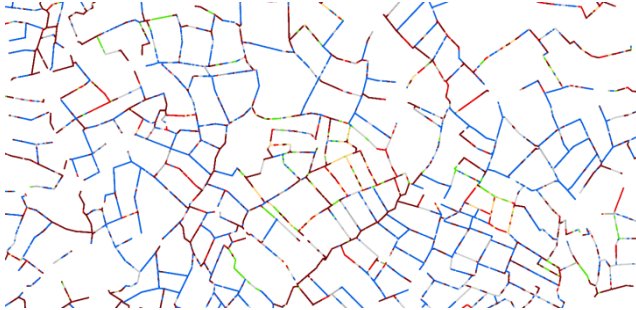


7000Acres Comments on Responses to the ExA's Second Set of Written Questions

Deadline 5 February 2024

| EXQ | Respondent | Question | Applicant's Response | 7000Acres Response to the Applicant |
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| 2.1.4 | Applicant/LCC | Article 38 (Felling or lopping of trees and removal of hedgerows) Please provide an update on discussions regarding this article. Where alternative drafting is proposed by LCC, please provide details. | <p>PINS Advice Note 15, Section 22, provides for two ways to manage hedgerow removals, in order to remove the requirement to obtain a separate consent under the Hedgerow Regulations 1997. Either a schedule or plan identifying the hedgerows to be removed is to be provided; or the DCO may contain a general power specifying that hedgerows can be removed, subject to the later consent of the local authority. The Applicant has adopted a hybrid approach, as flexibility is required as it is only following the detailed design for the Cable Route Corridor and the access points that the exact location of the hedgerow removal works will be known. Article 38(4) of the draft Development Consent Order [EX4/C3.1] provides the Applicant with the power to remove part of the hedgerows listed in Schedule 13 to</p> | <p>Hedgerows</p> <p>The UK Centre for Ecology and Hydrology has this month, February 2024, issued the UKCEH Land Cover Plus: Hedgerows 2016-2021 (England). This describes the extent and height of woody linear features, including hedgerows, tree lines and semi-natural thickets of shrubs and trees, on field boundaries in England. They have used the Environment Agency's LIDAR (Light Detection and Ranging) remote sensing product, captured in 2016-2021, to create a model of woody field boundaries classified by height.</p> <p>Land Cover Plus: Hedgerows data integrates spatially with UKCEH's Land Cover Map and is also compatible with the height classes used in the Countryside Survey. The dataset is a representation of the presence and height of hedgerows along the boundaries of Land Cover Map polygons rather than a fully georeferenced map of the position of each hedgerow on the ground, although there is generally close agreement between the two.</p> <p>UKCEH has previously created the Woody Linear Features Framework dataset describing the location and lengths of hedges and lines of trees for the whole of Great Britain. However, the opportunities presented by the National LIDAR Programme have allowed UKCEH to create a more</p> |

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| | | <p>the draft DCO, but only “to the extent set out in the landscape and ecological management plan”. This plan must be approved by the relevant planning authority pursuant to Requirement 7 of Schedule 2 to the draft DCO [EX4/C3.1]. ES Chapter 8 Landscape and Visual Impact [REP2-009] includes the retention and enhancement of trees and hedgerows as embedded mitigation. C7.3 Outline Landscape and Ecological Management Plan D [EX4/C7.3_E] (the ‘OLEMP’) sets out in paragraph 1.1.5 that wherever feasible, the Scheme utilises existing access points to accommodate access between fields, land areas, solar panel areas, substation sites and battery storage areas within the Order limits. The indicative extent of hedgerow removal is set out in Appendix C – Hedgerow Removal Plans of the OLEMP. Any minor hedgerow works (pruning, lopping and</p> | <p>accurate and detailed dataset for England incorporating the all-important attribute of shrub and tree heights.</p>  <p>4 x 2km sample of data from Land Cover Plus Hedgerows, showing woody boundaries of land parcels/fields colour-coded by height class (blue or green for shorter hedges and red for taller tree lines)</p> <p>UKCEH quote the potential uses as:</p> <ul style="list-style-type: none"> • Quantify the amount of woody field boundaries, and their type (by height class) for management, planning or mitigation. • Map the extent and distribution of wildlife habitats and dispersal corridors. • Aid planning in identifying where to create more hedges as corridors to better link up the hedgerow network and other habitats, such as woodland. • Estimate potential carbon storage in hedgerows and woody field boundaries. |
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| | | | <p>minor removals) associated with the Scheme, including highways improvements and access for construction, will be clarified in the final LEMP). The Applicant therefore considers that it has complied with Advice Note 15. Where the exact details of the hedgerow works cannot yet be confirmed, any removal work will be subject to later consent through the approval of the final version of the LEMP pursuant to Requirement 7.</p> | <ul style="list-style-type: none"> • Aid catchment flood modelling by representing landscape barriers and roughness. • Provide a clear baseline for future monitoring of hedgerow/field boundary features on a local or national scale. Repetition every 10 to 20 years would give a good picture of national changes and whether targets for planting and management were being met. <p>7000 acres recommend that this data is added to the DCO as the datum against which the development and growth of new and existing hedgerows within the proposed site are measured, in order to achieve the commitments made by the applicant to screen the views of the solar panels and associated works, and achieve the BNG gains committed too.</p> |
| 2.1.9 | Applicant | <p>Requirement 9 (Biodiversity Net Gain)</p> <p>The ExA notes the Applicant’s comments at ISH5 that different approaches are</p> | <p>The Applicant has updated Requirement 9 (biodiversity net gain) of Schedule 2 to the draft Development Consent Order [EX4/C3.1], and now reflects the approach taken in the final draft DCO submitted as part of the Mallard Pass Solar Farm examination. The revised drafting includes a minimum of 10% BNG</p> | <p>The House of Commons Environmental Audit Committee Report – Environmental Change and Food Security (29 November 2023) made a number of important points:</p> <ul style="list-style-type: none"> • Achieving food security goes hand in hand with achieving net zero and biodiversity targets. • We recommend that the Government designate food security as a public good and incorporate food security and environmental goals |

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| | | <p>being taken in other NSIP examinations (referencing the Mallard Pass and Gate Burton projects) in relation to Biodiversity Net Gain (BNG). Please can the Applicant confirm that the approach taken for the Proposed Development is similar to those recently closed examinations or whether a different approach is being taken here.</p> | <p>for river units; the Applicant is currently considering the specific minimum % that will be required for habitat and hedgerow units to allow for sufficient flexibility for any future changes to the metric and the detailed design of the Scheme.</p> <p>The Applicant notes that this is an evolving area and there is currently no standard approach. For example, the requirement in the Gate Burton Energy Park draft DCO does not specify a percentage and the Sunnica Energy Farm draft DCO (currently with the Secretary of State for determination) refers to a minimum of 10%.</p> | <p>more explicitly in the design of Environmental Land Management schemes.</p> <p>Paragraph 31 of the Report stated: <i>“Every hectare of arable land that we convert to housing or something 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> (https://committees.parliament.uk/publications/42481/documents/211176/default/)</p> <p>Unless the Applicant can demonstrate that the food, crops and biofuels produced by their scheme need not be replaced, then a true Biodiversity Net Gain assessment must take account of the <i>“much higher biodiversity impact, sometimes three to four times higher than in the UK.”</i> Therefore, to achieve a true BNG gain of 10%, a local gain of 30% must be secured, so the adverse impact of three times caused by outsourcing food production will be taken into account. Failure to do this will result in a local <u>Gross</u> calculation of Biodiversity Gain and not a true measure of Biodiversity <u>Net</u> Gain.</p> |
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| 2.1.10 | Applicant | <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>Please refer to the Applicant’s response to 2.1.9. Minimum percentages of BNG are now secured within the draft DCO, subject to flexibility to accommodate changes to the BNG metric for the Scheme and to allow for differences as a result of the detailed design.</p> | <p>Please refer to the 7000Acres response to 2.1.9.</p> <p>The Applicant has not secured a true Biodiversity Net Gain, merely a gross gain for the site, without taking into account the adverse impact of producing an equivalent amount of crops overseas.</p> |
| 2.1.14 | Applicant | <p>Requirement 21 (Decommissioning and Restoration)</p> <p>Please comment on WLDC’s suggested trigger mechanisms (as set out in its</p> | <p>The definition of “date of decommissioning” in the draft Development Consent Order [EX4/C3.1] is <i>“the date that that part of the authorised development has permanently ceased to generate electricity on a commercial basis”</i>.</p> | <p>7000 Acres shares WLDC’s concerns over the vague trigger mechanism currently in the dDCO.</p> |

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| | | <p>Written Summary of Oral Submissions at ISH5 [REP3-057].</p> | <p>Requirement 21 of the draft DCO requires the Applicant to notify the relevant planning authority 12 months prior to the intended date of decommissioning and submit the decommissioning plan for approval no later than 10 weeks prior to the intended date of decommissioning. The decommissioning plan must be complied with. Failure to comply with a DCO requirement, or a plan secured by a DCO requirement, is an offence and compliance can be enforced under the Planning Act 2008.</p> | |
| <p>2.2.2</p> | <p>All Parties</p> | <p>The Revised National Planning Policy Framework (NPPF) was published in December 2023. Comments are invited from all</p> | <p>Footnote 62 of the NPPF states that “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”. Footnote 62 of the NPPF should be read in the context of NPS EN-3 (November</p> | <p><u>ALC results interpretation and soils scientists.</u></p> <p>During this and other related NSIP examinations we are frequently advised of the significant weighting that the ALC grading of the soil holds with regard to the Secretary of States final decisions on the proposals.</p> <p>Natural England is the body whose opinions are sought on this issue and they have been having discussions with all of the applicants during</p> |

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| | | <p>parties on its implications for the consideration of the Proposed Development.</p> | <p>2023) which recognises that solar farms may be located on agricultural land where necessary (Paragraph 2.10.29). As set out in C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067], selection of the Site accounted for agricultural land classification. Paragraph 3.3.22 states that the Scheme maximises the utilisation of low grade, non best and most versatile (BMV) agricultural land with 95.9% of the land being classified as non BMV land. The land required for the Scheme has been demonstrated within C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067] to perform better than 8 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process. Consequently, it has been concluded that there are no obviously more suitable locations for the Scheme within the Search Area. The</p> | <p>these examinations. On a number of occasions the applicants have responded to questions from the examiners and interested parties (such as EN010133-001221-C8.1.15 1.8.7) that ‘ Natural England (NE) have specialists in ALC assessment and are the statutory consultee on matters relating to the agricultural land resource. In their comments of October 2023 [REP-098] NE noted that they are satisfied that the detailed ALC survey undertaken across the order limits is appropriate.’ However that statement implies that NE are satisfied with the methodology that has been used not the interpretation and recording of the ALC grade of the field auger and laboratory results. Furthermore the applicant has also advised (ref WB8.1.21 1.2.5) ‘<i>any variation in ALC grade ... will most likely to be a difference in assessment between two soil scientists</i>’. The Applicant is therefore accepting that the interpretation of the field results could be questioned by another specialist. All we ask is that the NE soil specialist should review the ALC survey data and report their own judgement on the ALC grades of the land, before the examiners submit their reports to the Secretary of State.</p> <p>This has become more relevant as a result of the High Court judgement by Judge Jarman KC</p> |
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| | | | <p>Applicant has no further additional comments to add regarding the National Planning Policy Framework (NPPF) December 2023 beyond what has already been stated in section 5.5 of the Planning Statement [EN010133/EX4/C7.5_C]. The Applicant considers that the changes do not change the compliance of the Scheme with the NPPF as assessed in the Planning Statement [EN010133/EX4/C7.5_C].</p> | <p>(Case No: AC-2023-LON-002550)¹ who agreed with the Longfield Inspector that written Ministerial Statements, NPPF, NPS, National Spatial Guidance and Policy BNE4 are applicable and that use of BMV agricultural land need to be justified by the most “<i>compelling evidence</i>”.</p> <p>In this proposal the Applicant has failed to submit compelling evidence that supports the use of BMV land. Therefore we would suggest that all of the 58 hectares of BMV land should be removed from the scheme.</p> |
| 2.2.3 | West Lindsey District Council (WLDC) /Applicant | WDLC in its response to ExQ1.2.3 [REP2076] has referred to a ‘health’ | <p>The “Health Impact Assessment for Planning Applications: Guidance Note” April 2023, is primarily to support policy S54 of the Central Lincolnshire Local Plan (2023) which states the requirements for a Health Impact Assessment for any development over 5 ha in area. Whilst the Applicant understands the Scheme is able</p> | <p>The Applicant has completely ignored the adverse impact on health in their assessment.</p> <p>7000Acres notes the Applicant has now submitted their Environmental Statement ES Addendum 21.1: Human Health and Wellbeing Effects. This document has been prepared by people with no specialist medical knowledge and is merely a precis of their previous flawed case. The Applicant has engaged specialists for other topics, such as battery</p> |

¹ <https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.html>

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| | | <p>Supplementary Planning Document (SPD). Please provide a copy of this SPD and identify relevant passages. The Applicant's comments are also sought on this.</p> | <p>to beneficially contribute towards the general themes of health and wellbeing the policy is written to achieve, this policy has not been considered by the Applicant as the policy is aimed almost entirely at TCPA planning applications and requirements at that scale. As the Scheme is an NSIP, the scoping for a HIA is to be determined by PINS. In the EIA Scoping Opinion [APP-064], the Applicant's approach to assessing health and wellbeing impacts was agreed with no requirement made for a separate HIA to be undertaken.</p> | <p>safety, soil health and archaeology, so why hasn't a specialist been used to report on the health implications?</p> <p>The NPPF identifies the need for open space and recreation as being important for the well-being of communities. The cumulative impact of the multiple NSIP solar schemes in the local area is not compatible with this aim.</p> <ul style="list-style-type: none"> EN-1 4.2.4 requires the Applicant: <p><i>"To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being."</i></p> EN-1 Paragraph 4.3.1: <p><i>"Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the</i></p> |
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| | | | | <p><i>construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health."</i></p> <ul style="list-style-type: none">• EN-1 4.3.4: <i>"As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate."</i>• EN-1 4.3.5: <i>"The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. "</i>• EN-1 4.3.6: <i>"Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e. those</i> |
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| | | | | <p><i>groups which may be differentially impacted by a development compared to wider society as a whole.”</i></p> <p>This scheme is unprecedented in its acreage, the size of the BESS and the use of 4.5m high solar panels. In addition, it is one of 6 schemes in the locality. The individual and cumulative impact on health and wellbeing, especially mental health, is enormous.</p> <p>7000Acres believes the Applicant must employ a healthcare specialist to conduct a professional assessment of the health and wellbeing impacts caused by this and the other solar NSIP schemes in the locality. In particular, this work must follow the recommendation of the 7000Acres health professional and include a Health Impact Assessment.</p> |
| 2.2.6 | Applicant | Please explain whether the continuing use of solar panels and batteries after their average lifespan of 40 | Please refer to C8.2.7 Review of Likely Significant Effects at 60 Years [REP2-058] for consideration of the changes to the findings of significant effects from considering a potential operational lifespan of the Scheme for up to 60 years. The Applicant confirms that the | <p>There are 2 issues to consider, the physical life of the solar panels and the economic life of the solar panels.</p> <p>Firstly the physical life. The Applicant has claimed a solar PV panel failure rate of 0.4% per annum, which means that 24% will fail and need replacing over the 60-year life of the scheme and potentially 60% of the panels will last 100 years! The Applicant has not presented any evidence</p> |

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| | | <p>years is likely to result in an increased failure rate. If so, please explain how this has been taken into account in the assessments presented in the ES.</p> | <p>assessment methodology underpinning this document is as set out in Chapter 2: EIA Process and Methodology [APP-037] and, where applicable, in each chapter of the Environmental Statement.</p> <p>There is currently no data available as to the failure rate of equivalent solar panels after 40 years. The parameters assessed in C8.2.7 Review of Likely Significant Effects at 60 Years [REP2-058] assume that a 0.4% per year replacement rate for panels continues between years 40 and 60 and that any effects would not be significant and can be adequately managed through the OEMP. In the event that a greater replacement rate was required due to an increased failure rate then the Applicant would need to demonstrate that such a replacement rate would not give rise to any new or materially different environmental effects compared to those assessed in the</p> | <p>for this low failure rate and anticipated life of the panels, in fact they state there is no evidence. Equipment failure rates do not tend to be linear but follow a “bathtub curve”, with a relatively high rate at the start of the project due to manufacturing faults, damage during transport and installation errors. The initial failure rate will decline for a few years and then increase again at an accelerating rate. Assuming a very low and linear failure rate is not a reasonable worse case assumption.</p> <p>Secondly the economic replacement rate. The energy generating capability of solar PV panels typically degrade by 1% per annum, even if they don’t fail physically. Taking this point into account, after 60 years the remaining panels will only be producing 40% of their initial output. Current industry evidence suggests that an economic life of a solar PV panel is close to 20 years, which takes into account the failure rate, degradation in energy generation and new technology becoming available. Using this reasonable worst-case assumption, the solar PV panels would be replaced twice (at 20 years and 40 years) during the life of the scheme. The Applicant’s Chapter 7 takes no account of replacing the solar panels, except for when they fail. The Applicant’s Review of Likely Significant Effects at 60 Years (EX1/WBB 2.3) states that extending the life of the scheme from 40 to 60 years will have no</p> |
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| | | | <p>Environmental Statement or make an application to amend the DCO.</p> <p>Alternatively, the Applicant may decide to decommission that part of the Scheme at that point in time. The replacement rate is the rate at which panels would be replaced should they cease to operate entirely. Separately, panel performance across the Scheme would gradually degrade over a number of years, but this has been accounted for within the models of the Scheme’s viability and production estimates and this would not be a reason in itself for large-scale panel replacement within the lifetime of the Scheme.</p> <p>The C8.2.7 Review of Likely Significant Effects at 60 Years [REP2-058] concludes that replacing the BESS for a second time between the years 40 to 60 (if required) is unlikely to give rise to likely significant GHG emissions..</p> | <p>additional impacts, i.e. there is no intention to replace the panels on economic grounds, merely failed units.</p> <p>This assumption is repeated in the Applicant’s response to the ExA’s second set of questions: <i>“Separately, panel performance across the Scheme would gradually degrade over a number of years, but this has been accounted for within the models of the Scheme’s viability and production estimates and this would not be a reason in itself for large-scale panel replacement within the lifetime of the Scheme.”</i></p> <p>Applying a degradation rate of 1% per annum, after 60 years the scheme will be producing 60% less energy. As the average output of new panels is only circa 11% of their rated power, providing an average of 66 MW of their maximum rated output of 600MW, reducing this by 60% to 26.4MW cannot be effective use of highly productive farming land?</p> <p>Either the Applicant will replace the solar PV panels, based on their economic life, to maintain the energy generation of the scheme, or they will only replace panels that have failed. In the former case, the current Chapter 7 and Review of Likely Significant Effects at 60 Years are incorrect and misleading. In the latter case, the total energy generation</p> |
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| | | | <p>The BESS will operate in line with manufacturers guidelines and the data analytics integrated into the Battery Management Systems will ensure that modules are decommissioned if operational performance is not within recommended parameters.</p> | <p>of the scheme over its life is much less than claimed and so the Applicant's ES is incorrect and misleading.</p> <p>The Applicant's overall documentation is inconsistent and misleading; either they will maintain the generating capacity of the scheme, in which case their GHG and transport assessments are incorrect, or they will only replace failed units, in which case their electrical generating claims are wrong.</p> <p>This is another example of where the Applicant has not followed Advice Notice Nine and submitted inconsistent documentation that does not use reasonable worst-case assumptions.</p> |
| <p>2.2.8</p> | <p>Applicant</p> | <p>Does the Applicant intend the Review of Likely Significant Effects at 60 Years [REP2-058] to be a certified document – as it is unclear whether</p> | <p>The conclusions of the Review of Likely Significant Effects at 60 Years [REP2-058] have been added to the updated Chapter 23 of the ES. However, the Applicant has amended Schedule 14 to the draft DCO to make it clear that both documents form part of the ES and are certified documents.</p> | <p>Please see our comments to 2.2.6.</p> <p>The 60 Years [REP2-058] document is not credible. It does not take account of the real failure rate and degradation rate of the solar panels and associated equipment. Therefore, it does not consider a reasonable worst case, as required by Advice Notice Nine.</p> |

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| | | or not it forms part of the ES. | | |
| 2.2.10 | Applicant | The ExA notes that the Concept Design Parameters and Principles document [REP3-020] was updated at Deadline 3. Please provide further explanation on the amendments made in relation to the scale of the Battery Energy Storage System (BESS). | The amendments made by the Applicant clarified the maximum dimensions of a BESS enclosure (53-foot ISO container) which would be permitted for the scheme. This is to allow a full range of BESS enclosure designs to be considered at the detailed design stage. Previous dimensions were based upon a relatively small-scale BESS cabinet design which could be obsolete within a relatively short time frame. More detail was also added to fire suppression system design concepts after discussion with Lincolnshire Fire and Rescue Service to reflect the latest BESS system fire protection designs. | 7000 Acres is concerned that the Design Parameters do not include a sufficient water supply, either stored or from the mains supply, included in the design. The Island Green Power’s BESS specialist, Mr Gregory, confirmed at the recent West Burton ISH 3 that a “2.5MWh container should burn out in approximately 12 hours”. The current design only has sufficient water, and storage for polluted fire water, for 2 hours of dousing, not 12 hours. |
| 2.3.1 | All interested parties | On 22 November 2023, the Department for | The November 2023 Energy National Policy Statements (NPSs) were formally designated on 17 January 2024. The | Although the NPS were updated, many of the fundamental principles remain unchanged. The suite of planning documents must be viewed in |

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| | | <p>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</p> | <p>Planning Statement [EN010133/EX4/C7.5_C] has been revised to align with the latest national policy position. Appendix 3 of the Planning Statement [EN010133/EX4/C7.5_C] sets out the modifications to the November 2023 NPSs and outlines the Scheme’s compliance to these revisions. In NPS EN-1 (November 2023), government concludes that national energy security and net zero ambitions will only be delivered through the development of new low carbon sources of energy at speed and scale (Para 4.2.2) and therefore that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (Para 4.2.4). Low carbon electricity generation infrastructure is</p> | <p>the round and a narrow focus on specific sentences must be avoided. In addition to the NPS, the NPPF must be taken into account.</p> <p>The NPPF identifies the need for open space and recreation as being important for the well-being of communities. The cumulative impact of the multiple NSIP solar schemes in the local area is not compatible with this aim.</p> <p>The NPPF addresses the use of farming land. Footnote 62 in the NPPF states:</p> <p><i>“62 Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. 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></p> <p>This is supported by the message from the Chief Planner² that accompanied the update to the NPPF in December 2023:</p> |
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² https://assets.publishing.service.gov.uk/media/65845c1623b70a000d234df8/11_Chief_Planners_Newsletter_Dec_2023.pdf

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| | | <p>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. Do any parties have any comments on the potential effect of changes in the November 2023 versions of the revised draft Energy NPS on</p> | <p>described as <i>“all onshore and offshore generation that does not involve fossil fuel combustion”</i> (Para 4.2.5) and as such large-scale solar generation would be classified as CNP infrastructure under NPS EN-1 (November 2023). Government expects that <i>“For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases”</i> (Para 4.1.7) The designation of large-scale solar as Critical National Priority infrastructure supports the Applicant’s case for the significant weight which it considers should be applied to the planning balance when considering the Scheme.</p> | <p><i>“A high-level description of the key changes is provided below, and was set out by the Levelling Up Secretary in his speech and accompanying WMS, but for the full detail and understanding of the policy please refer to the text of the NPPF itself. In headline terms, the new NPPF:.....</i></p> <ul style="list-style-type: none"> <i>• gives greater protection to agricultural land through additional reference to the need to address food production, maintaining the emphasis on best and most versatile (BMV) land;”</i> <p>In addition to the updated aims of NPPF, EN-1 4.2.4 requires the Applicant:</p> <p><i>“To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.”</i></p> |
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| | | <p>matters related to this application, compared to the March 2023 versions of the Energy National Policy Statements?</p> | | <p>EN-3 states that BMV land must not be used without justification: this is consistent with the NPPF and longstanding Government policy. This principle was upheld in the recent High Court Judgement³ where Island Green Power and Pinsent Mason lost an appeal against the Lullington solar scheme. The court upheld the point that BMV land must not be used unless there is “<i>compelling evidence</i>”. Even using the Applicant’s questionable classification, there are over 58 hectares of BMV land which therefore must be removed from the scheme. Merely having a grid connection is not “<i>compelling evidence</i>” to use BMV land. The High Court also upheld the conclusion of the Lullington Inspector that 40 years is not temporary use but “<i>generational</i>”.</p> <p>Finally, responding to the Applicant’s point on EN-3 para 4.1.7, this is an exceptional case as the Cottam solar industrial scheme will be:</p> |
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³ <https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.html>

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| | | | <ul style="list-style-type: none">• The one of the largest in Europe. The current largest is the Francisco Pizarro in Spain, it has a peak generation of 553MW.• Cottam will use 4.5m high sun tracking panels, which is unprecedented in the UK. Schemes like Sunnica and Stow Park use 2.5m high panels.• The dispersed nature of the scheme increases the harm as the effective footprint and intervisibility intensifies the regional impact.• It is one of 6 solar NSIPs in the local area, bringing about a regional change from a farming landscape to an industrial landscape.• The Applicant seeks a 60-year term for their project. The Inspector for the Lullington Solar scheme said that 40 years is not temporary use but “generational”. 60 years goes well beyond that.• The Applicant has not proposed any genuine mitigations. <p>So, this is an exceptional case!</p> |
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| 2.3.2 | Applicant | 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 “in line with industry standards” to the climate change assessment of operational impacts from panel | Please see the Applicant’s response to question 2.2.6 above. The Applicant has referred to an “average lifespan of 40 years” but there is currently no data available for panels of this type that have been operating for more than 40 years. Panel performance across the Scheme would gradually degrade over a number of years, but the rate of this degradation in 40 years’ time is not known. The Applicant’s position is that it should not be required to automatically decommission the whole of the Scheme at 40 years if it is still capable of generating electricity. Any replacement of panels will need to be within the parameters assessed in the Environmental Statement. | Please see our response to 2.2.6. The applicant is only taking account of the physical life of the panels and not the productive life. In addition to the claimed physical failure rate of 0.4% per annum (not supported with evidence), the efficiency of solar PV panels degrade by circa 1% per annum. Therefore, the generating capacity claimed by the Applicant will not be achieved if the solar panels are not changed on a frequent basis. Current evidence ⁴ shows that solar panels will be changed between 10 and 20 years on economic grounds. Therefore, the Applicant’s assessment of the GHG savings, impact on health, transport, waste and noise are a gross underestimation. If the Applicant choses not to maintain the scheme’s generating capacity by changing degrading solar panels, then it will be a poor use of productive farmland. In either scenario, the Applicant has not shown a reasonable worst case but presented a partial and inaccurate assessment. |
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⁴ <https://www.sciencedirect.com/science/article/pii/S2542435119304155>

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| | | <p>failure/replacement. Table 1.1 of the 'Review of Likely 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%</p> | | <p>In not taking into account replacing solar panels based on degradation over the 60 years, either the Applicant does not understand the issue, or the Applicant is deliberately presenting an inaccurate case.</p> |
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| | | replacement rate at 40 years. Can the Applicant explain this discrepancy? | | |
| 2.4.2 | Applicant | 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 | In light of the questions raised by the Examining Authority, the Applicant is proposing to submit a Cumulative Effects Addendum at Deadline 5 which will form part of the ES and provide a more detailed explanation of the reviews undertaken since the submission of the DCO Application and any changes made to Chapter 23. The Cumulative Effects Addendum will include the information contained in the latest version of the Joint Report on Interrelationships with other NSIPs and the information in Technical Note on Cumulative Effects [EN010133/EX4/C8.2.12]. The Applicant considers that it would be unusual and disproportionate to have to | Currently the Applicant’s byzantine documentation provides different answers in different sections. For example, most Chapter still refer to a 40 year lifetime. The Applicant has chosen to apply a Rochdale Envelope. Advice Notice Nine paragraph 1.4 requires “ consistency across the application documents ”. There is a serious lack of consistency. The NSIP process should be front loaded, with the Applicant coming to examination with a clear and coherent plan. In this case Island Green Power has changed major areas of the scheme post public consultation; these include increasing the timescale by 50% and major alterations to the cable routing. Therefore, the need to update the ES is self-induced. It is reasonable to expect the ES to contain a coherent case, where each section of the ES provides a consistent answer. Therefore, |

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| | | <p>Applicant’s intention that the Joint Report will be a certified document? 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</p> | <p>update the text in all of the ES Chapters and their associated appendices to account for any changes that have taken places since the DCO Application was submitted as this would result in a rewrite of the entire ES.</p> | <p>7000Acres requests all sections of the the ES is corrected to show “consistency across the application documents”.</p> |
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| | | 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. | | |
| 2.4.4 | Applicant | The ExA notes the additional information provided in Appendix E of the Joint Report on Interrelationships with other NSIPs | We are aware of the scale of challenge of preparing a cumulative impact assessment on climate change for all proposed NSIP developments. Each scheme has concluded significant beneficial cumulative impacts for the respective scheme in isolation. | 7000Acre has serious concerns over the Applicant’s use of “professional judgement”. Their judgement is at variance with the two other non-Island Green Power schemes and the Councils’ experts. Of particular note are findings of Moderately Beneficial for year 15 for Cottam 1, 2, 3a and 3B. At paragraph 4.10 of this same review, AHH Planning Consultants for LCC state, ‘we are not in agreement with the |

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| | | <p>[REP3-027] in respect of the professional judgements made on the cumulative effect on climate change. Please explain why the Applicant considers it is possible to assess cumulative effects on Climate Change given the national rather than local scale of the impact.</p> | <p>For Cottam/West Burton, a cumulative beneficial cumulative effect has been identified as four solar projects being developed at the same time would result in a quicker reduction in CO₂e emissions from legacy sources than a single project alone.</p> <p>This approach takes into account professional judgment and interpretation of the IEMA Guidance.</p> <p>A more conservative approach has been taken by Gate Burton and Tillbridge and no additional cumulative beneficial effects have been identified as a result of their interpretation of the Guidance. That interpretation considers that ‘cumulative effects’ are not possible to assess for climate change given the national, rather than local, scale of the impact.</p> <p>In light of this difference in interpretation, the SoS may decide to place limited weight on the beneficial cumulative</p> | <p><i>findings of the landscape assessment, and do not see any appropriate justification for assessing significant beneficial landscape effects on both landscape character areas, or individual contributors to landscape character by the construction and operation of a large solar development.’</i></p> <p>Lincolnshire County Councils consultants, AHH, found (paragraph 6.5) <i>“that the cumulative change to the landscape will be considerable and significant, and the combination of two or more sites has the potential to change the local landscape character at a scale that would be of more than local significance. The cumulative impact of the four adjacent NSIP scale solar schemes has the potential to affect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating what may be perceived as an ‘energy landscape’ as opposed to rural or agricultural one at present.”</i></p> <p>The “professional judgement” applied by the Applicant is an outlier when compared to others and so should be disregarded.</p> |
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| | | | effects identified by the Applicant (albeit, each Scheme has identified beneficial effects for each Scheme, assessed individually). Discussion between the different authors of the Climate Change | |
| 2.6.2 | Applicant | Further to the Applicant’s response to ExQ1.6.10 [REP2-034] in relation to why the significance of effects for decommissioning are not listed, how would decommissioning effects then be considered and | The Applicant’s position is that as a reasonable worst-case the effects at decommissioning would be the same as during the construction phase. However, the Applicant acknowledges that it is difficult to know what statutory conservation legislation will be in effect at that point in the future and there is therefore the potential for the significance of effects to increase at decommissioning beyond those identified at construction. For example, if more species become legally protected. | <p>The Applicant has submitted a partial and deficient ES. It does not consider many adverse effects of this scheme, including decommissioning.</p> <p>For example, a major issue identified by research commissioned by the Welsh Government⁵ is that farming land, especially BMV, is difficult to return to its original productive state. The Applicant has ignored issues such as the removal of steel piles, that frequency corrode to such a state that they remain in the ground, contaminating the soil.</p> <p><u>The Welsh Government research states</u></p> <p><i>“One of the key impacts on BMV agricultural land is soil compaction, which can vary considerably from very minimal and short term to severe, which possibly cannot be rectified. Compaction in the subsoil</i></p> |

⁵ <https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-3.pdf>

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| | | <p>assessed considering the ES should assess the worst case scenario for all stages of the Proposed Development.</p> | | <p><i>below about 45cm is unlikely to be practicable and economic to alleviate (Batey, 2009) and is unlikely to respond quickly to natural recovery through the freeze-thaw cycle. Where compaction is present at depth it is a long-term limitation and it is taken into account in the ALC Guidelines (MAFF, 1988) through reduced permeability in the wetness assessment and crop available water in soil droughtiness assessment. There will be compaction at the time of construction, which may remain for the lifespan of the development. Further compaction may result at the decommissioning phase. The timescale for reversibility is undefined but is taken in this report as the point at which decommissioning is completed. The time taken for a soil with compaction to recover depends on the severity of the compaction and the soil type. Business Wales (2018) and Froehlich et al (1985) reported that natural recovery of a compacted soil is complex and a slow process. Batey (2009) refers to 30 years for a compacted soil to recover, where 'industrial' compaction extends to depths of 1m or more (Spoor, 2006). Hakansson (1988) reported that compaction may be very persistent in the subsoil and permanent. Nawaz et al (2012) presented a review of research and concluded that soil compaction is rapid and easy to create with agricultural machinery but it can be years before the soil is recovered. Keller et al (2017) noted that knowledge regarding soil compaction rates is 'sketchy' with experimental evidence of recovery periods from a</i></p> |
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| | | | | <p><i>few months to years and decades. Differences in laboratory and field experiments highlight the ‘partial and incomplete’ knowledge of the key processes involved in soil structure recovery.”</i></p> <p>The Applicant’s soil specialist, Mr Baird, has stated that work will not be done on the scheme when it is wet, but this is not secured. Therefore, a reasonable worst case is that the soil will be compacted and decommissioning will result in damaged and compacted land being left on the site. This is another reason why no BMV land must be included in the scheme, as there is high likelihood it will be permanently degraded due to compaction, and so it will not be “<i>temporary use</i>”.</p> |
| 2.7.8 | Applicant | Further to the Applicant’s response to ExQ1.7.19 [REP2-034], if the Applicant is relying on the site owner(s) to bear responsibility for the robust | The Applicant notes that all landowners have legal riparian responsibilities for drains located on their properties. The Applicant is not suggesting that landowners need to undertake any additional works or responsibilities than they are already subject to. The Applicant will be responsible for the maintenance of any drains located within the solar arrays under the terms of the voluntary | It is highly unlikely that absentee landlords leasing their land to the Applicant will continue to maintain the land. The duty to maintain the drainage must clearly fall on the lessee, unless otherwise secured. |

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| | | <p>maintenance of drainage, how will this be secured and have the owners been made aware of these responsibilities?</p> | <p>property agreements during the operation of the Scheme.</p> | |
| 2.7.9 | Applicant | <p>Paragraph 6.10.40 of the revised Planning Statement [REP2-028] states in relation to drainage that vehicles should be fitted with low pressure tyres to further reduce the</p> | <p>Paragraph 3.1.1 of the C6.3.19.2_B Outline Soil Management Plan [REP3-010] sets out general principles to be included within the soil management plan including “use low ground pressure (LGP models) and tracked vehicles where possible when working directly on bare or vegetated soils to minimise the extent and/or</p> | <p>Research by the Welsh Government identifies soil compaction as a major issue, leading to the deterioration of the soil and the inability of returning productive farming land, especially BMV, to its original state⁶. <u>The Welsh Government research states</u> <i>“One of the key impacts on BMV agricultural land is soil compaction, which can vary considerably from very minimal and short term to severe, which possibly cannot be rectified. Compaction in the subsoil below about 45cm is unlikely to be practicable and economic to alleviate (Batey, 2009) and is unlikely to respond quickly to natural recovery through the freeze-thaw cycle. Where compaction is present at depth it is a long-term limitation and it is taken into account in the ALC</i></p> |

⁶ <https://www.gov.wales/sites/default/files/publications/2023-08/impact-solar-photovoltaic-sites-agricultural-soils-land-spep21-22-03-work-package-3.pdf>

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| | | <p>impact on the underlying soil.</p> | | <p><i>Guidelines (MAFF, 1988) through reduced permeability in the wetness assessment and crop available water in soil droughtiness assessment. There will be compaction at the time of construction, which may remain for the lifespan of the development. Further compaction may result at the decommissioning phase. The timescale for reversibility is undefined but is taken in this report as the point at which decommissioning is completed. The time taken for a soil with compaction to recover depends on the severity of the compaction and the soil type. Business Wales (2018) and Froehlich et al (1985) reported that natural recovery of a compacted soil is complex and a slow process. Batey (2009) refers to 30 years for a compacted soil to recover, where ‘industrial’ compaction extends to depths of 1m or more (Spoor, 2006). Hakansson (1988) reported that compaction may be very persistent in the subsoil and permanent. Nawaz et al (2012) presented a review of research and concluded that soil compaction is rapid and easy to create with agricultural machinery but it can be years before the soil is recovered. Keller et al (2017) noted that knowledge regarding soil compaction rates is ‘sketchy’ with experimental evidence of recovery periods from a few months to years and decades. Differences in laboratory and field experiments highlight the ‘partial and incomplete’ knowledge of the key processes involved in soil structure recovery.”</i></p> |
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| | | | | Unless the use of low pressure tyres and tracks on all vehicles, and only working the land in dry conditions is secured, it should be assumed as a reasonable worst case that soil compaction will occur. The ES should take account of this reasonable worst case when assessing soil health. |
| 2.8.1 | Applicant | Has the cable route corridor been surveyed since the response to ExQ1 and when will this information be before the examination, as regards the depth where the cables would be found, and in relation to soil management and field drainage? | A soil survey of the Cable Route Corridor (including an ALC assessment) will be undertaken post consent and prior to the commencement of construction. Undertaking the survey at this time, once the detailed design has been confirmed, will allow the survey to be confined to the actual land to be excavated rather than the entirety of the Cable Route Corridor. | 7000Acres believes that a full survey of the cable route must be conducted before consent. Many issues over the cable routing have been raised by IPs and so the Applicant must provide clear survey evidence so the ExA can make an informed judgement on the suitability of the scheme. |

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| <p>2.8.3</p> | <p>Applicant</p> | <p>Can the Applicant provide some details of the farming circumstances along the cable route corridor?</p> | <p>As noted at paragraph 19.3.7 of the ES Chapter 19 Soils and Agriculture [REP-010], the cable route corridor has not been subject to soil surveys or farming circumstances assessment as the narrow cable trench will need a specific survey along its actual path to inform soil management planning of the trenching works. Detailed ALC survey of fields places sample points at 100m intervals, too widely spaced to monitor soil variation within the soil to be excavated for the trench.</p> <p>Farming circumstances information for the Cable Route Corridor will be obtained post consent. This will include greater detail on current land use, for instance the actual cropping of land at the time of the cable trenching work rather than a typical arable rotation across a farm's arable land. This will enable an assessment of particularly sensitive</p> | <p>The NSIP process is designed to be front loaded, with the Applicant providing a clear and coherent case ready for examination.</p> <p>In this case the Applicant has made major changes to several aspects of the scheme. The Applicant must present evidence why these changes are acceptable and as part of that process must provide survey data. Leaving this important aspect of the scheme to post consent does not allow the ExA to take full account of the adverse effects. In the opinion of 7000Acres, the lack of survey data is unacceptable.</p> |
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| | | | <p>periods of time for trenching work to seek to avoid, for instance target harvest dates.</p> <p>Compensation will be paid to landowners for any loss or damage, for example crop damage, if it is not practicable to avoid sensitive periods of time.</p> | |
| 2.8.4 | Applicant | <p>The ExA notes the Applicant’s explanation as to why the IEMA threshold of 20 hectares has not been applied. Please explain whether, and if so how, the application of the 20 hectares threshold would alter the conclusions of ES</p> | <p>The IEMA threshold of 20ha for BMV land is given on Table 19.4 and described in paragraph 19.7.7 of ES Chapter 19 Soils and Agriculture [REP-010]. This IEMA threshold is for the permanent loss of 20ha of BMV agricultural land. As the Scheme will be decommissioned no later than 60 years following the date of final commissioning and the vast majority of the Site can remain in agricultural production throughout the operational period, loss of agricultural land is not permanent. There is therefore no change to the assessment of environmental</p> | <p>Due to the compaction of soil and the difficulty in removing corroded solar frame piles, identified in Welsh Government Research, and discussed in Q 2.7.9, it is highly probably that BMV land will be lost. The Applicant has claimed that land can remain in agricultural production, presumably by farming sheep. This is not secured, neither is sheep farming a feature of the local economy. Additionally, sheep farming is not productive use of BMV land for 60 years.</p> |

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| | | Chapter 19: Agriculture and Soils [REP-010] in so far as it relates to the loss of agricultural land resource. | effects if the IEMA 20ha threshold was applied. | |
| 2.8.5 | Applicant | The Review of Likely Significant Effects at 60 Years document [REP2-058] sets out that soil resources will benefit from the longer fallow period. Please explain how this extended time period would affect agricultural productivity given that the Applicant | Agricultural productivity is often described in economic terms as the value of a tonne dry matter of one crop is not equivalent to that of another crop, or even the same crop in a different year. The economic value of hosting Solar PV (i.e. the income received for the lease of land) is anticipated to exceed that of rotations of combinable crops such as wheat, barley and oil seed. Any farm income from grazing sheep within the solar farm will be in addition. | <p>Soil Health</p> <p>EN010133-000869-Natural England - Written Representations and summaries</p> <p><i>Further advice relating to soils and Best and Most Versatile land from Natural England.</i></p> <p><i>Additional advice has been provided in relation to other large solar projects in the East Midlands. Natural England feel that it would be beneficial to share this with the applicant.</i></p> <ul style="list-style-type: none"> - <i>The detailed ALC Survey data should be used wherever possible to inform restoration practises, i.e., to ensure the soil is restored to the same depth and profile described during the ALC survey.</i> - <i>The proposals do not currently include any monitoring of soil health or land quality during the operational phase. Issues with soil protection may occur where, for example, vegetation cover fails to establish, or areas of bare ground appear during operation. Natural England would</i> |

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| | | <p>is not relying on the land remaining in agricultural use during the operational period?</p> | | <p><i>recommend ongoing monitoring to prevent any unexpected impacts to soil health and/or land quality. It is noted that vegetation management will be secured via the oLEMP, however this should be cross-referenced within the oSMP to ensure the role of this in protecting soil is apparent during the operational period.</i></p> <p><i>- Although arable reversion to grassland has been shown to benefit soil quality (through increased Soil Organic Matter (SOM)), it is unclear what impact solar arrays will have on soil properties such as carbon storage, structure and biodiversity. For example, as a result of changes in shading; temperature changes; preferential flow pathways; micro-climate; and vegetation growth caused by the panels. Therefore, it is currently unknown what the overall impact of a temporary Solar development will have on soil health. In the absence of this information, we suggest that the developer could commit to a programme of soil health monitoring for the lifetime of the project to support development of the evidence base around long-term impacts to soil health from solar.</i></p> <p>In light of the above statements from NE, 7000 acres would recommend that an annual programme on soil health monitoring is added to the DCO and referenced in the oSMP 010133-EX3/C6.3.19.2_B 8.6.6 Other evidence also shows that large scale solar arrays can have a detrimental impact on soil health and drainage.</p> |
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| | | | | <p>Evidence of the Damaging Effect of Solar Panels on Soil Health</p> <p>Research from the Welsh Government (The impact on solar photovoltaic (PV) sites on agricultural soils and land quality – March 2023) states:</p> <p><i>“The key impact of solar PV sites on land and soil may be caused by compaction leading to soil structural damage. The effects of soil compaction on soil structure lead to reduced permeability to water and air as well as increased surface runoff and erosion. Compaction near the surface and generally above a depth of 45cm can be alleviated. However the alleviation of deep compaction requires equipment such as a bulldozer and winged tine set to a depth to 60cm. The reversibility of soil compaction may take many years and in some cases compaction may be permanent. An assessment on the effect of compaction on the Best and Most Versatile agricultural land (land in MAFF Agricultural Land Classification grades 1, 2 and 3a) shows that the loss of high quality agricultural land is likely to occur in wetter parts of England and Wales.”</i></p> <p>Other research papers showing the damage that solar arrays cause to soil are:</p> <ol style="list-style-type: none">1. Solar park microclimate and vegetation management effects on grassland carbon cycling 2016. This paper states: |
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| | | | | <p>https://iopscience.iop.org/article/10.1088/1748-9326/11/7/074016/pdf</p> <p><i>“The effects of this growing land use change on plant–soil processes, which underpin key ecosystem services, is poorly understood. In this study we show that PV arrays can cause both seasonal and diurnal variation in the ground-level microclimate to a magnitude known to affect terrestrial C cycling. We also observed significant differences in above-ground biomass, plant diversity and ecosystem CO2 fluxes which were associated with the vegetation management and microclimate. Solar parks contribute to climate change mitigation by providing low carbon energy, but the wider environmental costs and benefits need to be taken into account, to ensure they are deployed sustainably.”</i></p> <p>2. Effects of Revegetation on Soil Physical and Chemical Properties in Solar Photovoltaic Infrastructure</p> <p>https://www.frontiersin.org/articles/10.3389/fenvs.2020.00140/full</p> <p>This paper states:</p> <p><i>“We investigated critical soil physical and chemical parameters at a revegetated photovoltaic array and an adjacent reference grassland in Colorado, United States. Seven years after revegetation, we found that carbon and nitrogen remained lower in the PV soil than in the reference</i></p> |
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| | | | | <p><i>soil and contained a greater fraction of coarse particles. We also found that the PV modules introduced heterogeneity in the soil moisture distribution, with precipitation accumulating along the lower edges of panels.”</i></p> <p>The Applicant has made statements on soil health but has failed to provide clear evidence to support their claims. Unless the Applicant can provide clear evidence, then the detailed and peer reviewed research cited above should be preferred.</p> |
| 2.12.7 | Applicant | <p>The Applicant stated during the December hearings that it was going to look at the health impact matters that had been raised. Please provide an update at Deadline 4.</p> | <p>The Applicant has provided ES Addendum 21.1: Human Health [EN010133/EX4/C8.4.21.1] in response to the matters raised at Agenda Item 4 of ISH 4. This document provides a comprehensive collation of human health matters assessed throughout the ES [APP-036 to APP-058].</p> | <p>Please see the 7000Acres response to Q2.2.3.</p> <p>The Applicant has not used a health professional to assess this important issue. Why have they not engaged a specialist as for other topics, such as soil health, archaeology, BESS safety and others.</p> <p>The document produced by the Applicant is merely a precis of their previously shallow and flawed assessment.</p> <p>The Applicant has ignored EN-1 4.2.4 which requires it: <i>“To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and</i></p> |

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| | | | | <p><i>show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.</i></p> <p>The impact of this unprecedented scheme, along with the multiple other NSIPs in the local area, will have an adverse impact on residents' physical health, mental health and wellbeing.</p> <p>This issue must be considered seriously by a health professional and not just dismissed by the Applicant's lay person.</p> |
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