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Rt Hon Claire Coutinho Secretary of State for Energy Security and Net Zero Department for Energy Security and Net Zero Level 3 55 Whitehall London Your contact for this matter is: Sally Grindrod-Smith

Email: west-lindsey.gov.uk

Date: 18th June 2024

## Dear Minister

SW1 2HP

West Lindsey District Council (WLDC) is the 'host' Authority for the location of three Nationally Significant Infrastructure Projects (NSIPS) that have all recently been through their 'examination' process under the Planning Act 2008. These projects comprise Gate Burton Energy Park, Cottam Solar Project and West Burton Solar Project. A fourth solar NSIP, Tillbridge Solar Project has also been 'accepted' for examination within the past few weeks.

All of these projects would have significant impacts on the communities of West Lindsey during their construction, operation and future decommissioning. The construction phase alone for all three projects could extend to up to ten years and the cumulative impacts on landscape character and loss of agricultural land would be experienced over a distance of around 13 miles, with the combined application areas of all three projects totalling some 3,161ha.

Following the close of the three 'examinations', WLDC welcome the Ministerial Statement made on 15<sup>th</sup> May 2024 titled "Solar and protecting our Food Security and Best and Most Versatile (BMV) Land" but also addressing several key issues relating to solar farm development. WLDC would like to take this opportunity to support the matters raised in the Ministerial Statement and highlight how these issues will negatively affect our District.

The impacts raised in your Ministerial Statement reflect the significant concerns raised by WLDC during the examination of the solar farm applications. WLDC agrees that it is essential that solar PV technology is deployed in a manner that minimises the loss of agricultural land in the interests of food security. This requirement extends to the consideration of the total size of solar PV development sites, which includes land required for associated development such as cables, converter stations and BESS. Projects that constitute an inefficient use of land should be resisted. Furthermore, whilst many applicants claim that solar PV projects can operate alongside agricultural activities, no mechanisms to guarantee such dual use are imposed. With no such obligations, the agricultural sectors which are so important to our local economy will be degraded with low likelihood of recovery.

WLDC has consistently voiced its concerns about the manner in which the cumulative impacts of all three applications have been considered. The Environmental Statements for each project vary greatly in terms of assessed impacts and there has been no opportunity to examine the impacts in a combined manner. WLDC would welcome the determination of the three applications concurrently to ensure that the magnitude of the impacts caused by the three adjacent sites are considered together.

WLDC remain very concerned that the amount of NSIP scale ground mounted solar PV proposed within the District will result in significant environmental and socio-economic impacts upon communities. Applicants are now seeking development consent for a period of 60 years and reducing assessed impacts on the basis they are 'temporary' and 'reversible'. WLDC considers such a timeframe to be permanent in nature and wishes the applications to be determined on that basis. The loss of agricultural activity for such a period of time will also severely compromise the agricultural



sector with no likelihood that the production of food will recommence following the removal of solar PV projects.

WLDC welcomes the Minister's support for solar on rooftops and brownfield sites. The forthcoming Solar Roadmap is critical to provide a clear policy direction regarding the emphasis upon the expected contribution of solar deployment by such means in conjunction with ground-mounted technology.

For the reasons cited above, WLDC encourages the following to be considered in the determination of the three NSIP applications:

- Food production must be guaranteed to continue alongside the ground-mounted solar PV projects.
- The avoidance of 'clustering' of NSIP scale projects that give rise to significant cumulative impacts;
- Ground mounted solar projects should be designed as single contiguous sites and not disaggregated, ad-hoc pockets of development that affect wide geographical areas;
- The three projects located within the West Lindsey District currently at the 'decision' stage should be determined at the same time to enable a thorough consideration of their cumulative impacts together; and
- Decisions on NSIP scale solar PV projects should be informed by the forthcoming 'roadmap'.

WLDC believes that the UK is making significant progress towards the decarbonisation of the energy generating sector and the solar PV will play an important role to achieving Net-Zero targets. In doing so, it is imperative that policy is implemented, through planning decisions, in a manner that delivers projects that truly minimise their impacts on communities, the environment and the socio-economic health of sectors that they will harm. WLDC wishes to thank you for issuing a timely Ministerial Statement that addresses key concerns being experienced in our District and trusts that these considerations will be given due weight in forthcoming planning decisions.

Yours sincerely

Cllr Trevor Young Leader West Lindsey District Council

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Application Ref: EN-010131

West Lindsey District Council ID: GABE-ISP002

Cottam:

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Application Ref: EN-010133

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West Burton:

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Application Ref: EN-010132

West Lindsey District Council ID: 20038501