## **Application by Tillbridge Solar Limited**

**The 7000 Acres Group** write to submit the following issues in relation to the agenda items for the Preliminary Meeting 15th October 2024 as requested in the Examining Authority's rule 6 letter, dated 17<sup>th</sup> September 2024.

## Agenda Item 2

# The Examining Authority's remarks about the Examination process

 We note that The Examining Authority states that IP's may be asked to contribute to the making of Statements of Common Ground (SoCG) where agreement is possible and where matters of disagreement or matters outstanding can be catalogued.

7000 acres wish The Examining Authority to know that to date no such contribution has been offered to the group and its members. The Tillbridge Solar Project will be the fourth scheme with which we have been directly involved as it is the fourth scheme within the West Lindsey District.

At the close of the Gate Burton, West Burton and Cottam Solar Projects, 7000 acres had a list of unresolved issues which were not catalogued in any SoCG. Therefore, we would now expect to be able to list any outstanding matters or disagreements on the Statement of Common Ground for the Tillbridge Solar Project. We await your response.

#### Agenda Item 3

#### Initial Assessment of Principal Issues (IAPI) – Annex C to Rule 6 letter

 7000 acres believe that the Principal Issues can only be adequate for the examination if they are sufficiently thorough in their consideration. Particular areas where focus should be considered are:

## **Principal Issue 2: Climate Change**

- i. Given the fundamental purpose of the proposed development is to address climate change, it is vital that the sustainability implications of having displaced food and biofuel crops are considered. The net carbon effect of importing food or switching biofuels for solar should be included, and the cumulative impact in this regard is particularly important, given the scale of land-use change, locally and nationally.
- ii. This is also important in the context of the UK's wider resilience to climate change and the need for climate change adaptation e.g. to expected rise of sea levels and the implied loss of UK land mass, including farmland.

# **Principal Issue 3: Cumulative and In-Combination effects**

i. The cumulative and in-combination effects should be considered from both the local perspective and at a national level. These effects cross-over every other issue but have very different impacts at a local or a national level.

# Principal Issue 6: Human Health, safety, accidents and major accidents

- i. Examinations have tended to assess the physical health impacts or immediate dangers arising from the development (e.g. BESS thermal runaway). The examination should also address the mental health and wellbeing implications of people having to live in and amongst an area of extensive development particularly where the development has the potential to adversely impact the quality of life for residents, e.g. impacting livelihoods, landscapes and amenities, in the context of the physical scale of development, which the UK has no experience.
- ii. It is requested that a Health Impact Assessment is carried out in support of this issue.

## Agenda Item 4

#### **Draft Examination Timetable – Annex D** to Rule 6 letter

 The members of 7000 acres and other Interested Parties in the locality are dismayed at the Open Floor Hearing (OFH1) being held at 10.00am.

In effect this excludes IP's ability to participate.

We are aware this is also a written process but many residents have waited a long time to present their verbal case to the ExA and now feel that they have been excluded in the first instance.

It would be greatly appreciated and acknowledged if the ExA could adjust the time to the evening of the 16<sup>th</sup> October to allow more IPs to attend in person.

 Also, it is noted that suggested locations for Accompanied Site Inspection (ASI) have a deadline of 1st October.
We respectfully request that the ExA delays this matter. IPs are suffering from consultation/examination fatigue due to being part of three other NSIP Examinations of late. Therefore, if this request could be deferred for a short period of time, it would be appreciated.

#### Agenda Item 5

# Notification of Initial Hearings – Annex E to Rule 6 letter

 The introduction of the Event Participation Form is a further barrier to Interested Parties becoming involved in the Examination process. Residents do not have the professional experience or expertise in these types of projects. The process, terminology and timetable are tailored for professionals within this line of work or realm of understanding. Residents and the public need more time to understand and discuss the requirements with other interested parties so that they can then make their personal submissions and formulate arguments. Therefore, the use of an Event Participation Form creates another barrier for IPs to engage in a process which is alien to them.

Previous hearings have demonstrated that IP's need flexibility to attend and participate.

# Agenda Item 6

**Procedural Decisions – Annex F** to Rule 6 letter

○ Please refer to Agenda Item 4 – Accompanied Site Inspection (ASI)

## Agenda Item 7

#### Any other matters

 All participants involved in this NSIP process need to have confidence that all elements and stages are fair and reasonable and without bias or prejudice.

However, the Secretary of State (the decision maker) is not without bias. This is evident in his comments made during his recent speech at the Energy UK Conference where he, and I quote, vowed to 'take on the blockers, the delayers, the obstructionists' because in his opinion... 'Every wind turbine we block, every solar

farm we reject, every piece of grid we fail to build makes us less secure and more exposed.'

This declared standpoint illustrates a potential for a high degree of bias and prejudice in determining NSIP's by this Secretary of State and as such the NSIP process and purpose is undermined.

- Furthermore, the Secretary of State's Labour colleagues have launched a 'Smash the NIMBYs' campaign. This aggressive rhetoric from the people in power is divisive and demeaning. IPs have legitimate concerns which need to be raised in a free and fair process.
- The above speech made by the Secretary of State has undermined confidence and validity of the NSIP process for IPs.
- o Lastly, we note the recent decision by the Secretary of State to grant development consent for Sunnica Energy Farm contrasted with the Examining Authorities recommendation for refusal. This decision, along with the granting of development consent for Mallard Pass, Gate Burton and Cottam Solar Projects, all within quick succession, illustrates that the Secretary of State is indeed on a mission to make fast decisions. As IPs who will be directly affected and harmed by these proposals, we ask the Examining Authority to address the lack of confidence we now rightly have in this process and the bias displayed by the decision maker.

Signed J Allan

On behalf of 7000 Acres

www.7000acres.co.uk