

## Registration Identification Number 20047528

1. The adequacy of the alternatives considered. Whether wind turbines located closer to Drax would be more suitable given that less land would be needed to generate the output needed to finance the cost of a shorter grid connection and still produce an acceptable return on investment. Agricultural use could continue largely unaffected, security fencing, CCTV and lighting would only be required for any associated infrastructure rather than the turbines; wildlife could continue largely unaffected and returning the land to its former use would be relatively more straightforward and probably cheaper.
2. The scale of the project. In excess of 3,000 acres of agricultural land covered in solar panels with associated infrastructure, security fencing, lighting, CCTV will turn a huge area in to something resembling an industrial estate.
3. Suitability of the location. The distance from Drax necessitates creation of a very long connection passing under two main rivers. The cost requires increased generating capacity. Swapping to wind turbine generation closer to Drax reduces the connection costs and wind turbines are more efficient so less land will be needed to generate the same power. Add to this that land quality is less relevant as farming activity should be largely unaffected.
4. The likely adverse environmental impact given the coverage of large areas of land with solar panels and associated infrastructure, alterations to the road network, security measures (fencing, lighting, CCTV etc.) needed to protect the installations from theft and damage; interruption to the habitat of wildlife - much of which would not be experienced if solar panels were changed to wind turbines located closer to Drax.
5. The likely adverse ecological impact which will be caused by developing farmland displacing much of the wildlife that inhabits it now, compacting the soil, disturbing the current field drainage by piled foundations, which cannot easily be removed at the end of the life of the project to restore the land to arable farming use.
6. The likely adverse impact on the 3320m Verge Nature Reserve No: SE73/B021 Grid reference: SE709/308 (Western End, Tithe Farm Junction) - SE737/313 (Eastern End, Brind Lane Bend). The 10 average width verge begins at Tithe Farm, 440m due south of Wressle and then follows Cross Common Lane East, passing Green Lane crossroads, over the railway line, passing Wressle Brickyard. Cross Common Lane then becomes Willitoft Road. At the junction to Brind, it follows Brind Lane to the significant bend in the road (marked by a shelterbelt of conifers). After this bend in Brind Lane the VMR designation ends
7. The likelihood of flood risk due to drainage problems and the generation of significantly greater volumes of surface water. Compacted land caused during the construction phase, the use of piling for panel foundations and surface water run off from arrays of solar panels (e.g. from precipitation and from cleaning the panels several times a year) could compound the drainage problems experienced by many of the fields intended to be developed.
8. The likely adverse impact on landscape and visual amenity. The landscape is presently rural. It will be changed forever by the installation on an industrial scale of solar panels and associated infrastructure, security fencing, CCTV systems and lighting. The fact that the developer proposes to ameliorate the visual impact by landscaping is simply hiding the scars on the landscape as and when planting reaches maturity in many years' time. There will be no escaping the changes to parts of the road network planned to be made to facilitate construction and maintenance, the dominant security fencing and gates that will be needed to deter theft and vandalism, the lighting needed to ensure any CCTV footage captured at

nighttime will be of evidential value. Accepting that policy requires the increase in renewable energy generation and the reduction of carbon generating sources, the judgment to be made is if wind turbines taking up less land and capable of being farmed as hitherto is preferable to the sterilisation of more land - possibly for ever given almost insurmountable difficulties and the huge expense of decommissioning so that piling and foundations are removed and the land can resume arable use - i.e. ploughing, rotavating, harrowing and drilling. Decommissioning wind turbines would only require piling to be removed from the turbines and associated sub-stations etc, rather than acres of panels.

9. The interference with the amenity of residents and visitors due to the noise and vibration during construction and decommissioning and the noise during operational times.
10. The likelihood of serious transport and access issues arising during the construction and decommissioning phases given the nature of the local road network, the intensity of use of it for large agricultural traffic and, in the case of Wressle, the use by the Spaldington food waste plant of various small country lanes to transport digestate to local farms using 28,000 litre tractor drawn tankers which have already caused substantial damage to the road surfaces and verges and are a danger to other road users.
11. Uncertainty as to the ability of the National Grid to accept connection when the project has been completed. The indicative target connection date of Autumn 2029 is not guaranteed, and the National Grid has made plain the fact that the whole grid needs to be upgraded to be able to accept connections from all the currently permitted solar and wind generation schemes. Arguably consent should not be given for this in the absence of a guaranteed grid connection. It would be wrong for the project to be commenced and abandoned part way through due to lack of grid connection and/or loss of viability.
12. Uncertainty as to the ability of the applicant to fund the CPO's needed, the carrying out of the development and decommissioning given that it is a special purpose company with no assets and net current liabilities as at its last published balance sheet date. If consent is to be given the applicant should be required to provide security and guarantees for the costs to be incurred in assembling the land interests, carrying out the enabling works, carrying out the development of the project, the maintenance of it and decommissioning. Such security and guarantees should not be released if there is a change of control of the developer unless replaced with security and guarantees of similar or greater strength.

Chris Ross

13<sup>th</sup> November 2024

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### Concerns about:

1. the adequacy of the alternatives considered;
2. the scale of the project;
3. the suitability of the location;.
4. the likely adverse environmental impact;
5. the likely adverse ecological impact;
6. the likely adverse impact on the 3320m Verge Nature Reserve No: SE73/B021 Grid reference: SE709/308 (Western End, Tithe Farm Junction) - SE737/313 (Eastern End, Brind Lane Bend);
7. the likelihood of flood risk;
8. the likely adverse impact on landscape and visual amenity;
9. the likely interference with the amenity of residents and visitors;
10. the likelihood of serious transport and access issues arising during the construction and decommissioning phases;
11. uncertainty as to the ability of the National Grid to accept connection when the project has been completed.
12. uncertainty as to the ability of the applicant to fund the project (e.g. CPO's, carrying out enabling works and the development and the decommissioning) given that the applicant is a special purpose company with net current liabilities as at its last published balance sheet date.