

7000Acres

7000Acres Responses to the Tillbridge ExA's Third Set of Written Questions

Deadline 6, 1st April 2025

| ExQ3 | Question to: | Question: | 7000Acres Response |
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| Q2. 3.1.1 | Applicant, LCC, WLDC and 7000 Acres | <p>Planning Balance in SoCGs</p> <p>Could the applicant and the respective parties to Statements of Common Ground (SoCG) please include a clear section on the planning balance to be applied in the determination of this application? In particular, the ExA would like these parties to please confirm their positions (and points of difference) on the weight to be afforded to the adverse effects and the benefits of the proposal. For example, the ExA understands that WLDC does not criticise the conclusions reached on adverse effects in the applicant's ES. Where it differs is on the weight to be afforded to these adverse effects in the overall planning balance. As such, it is essential that the difference between the applicant and WLDC is established on a topic-by-topic basis in the SoCG. The same exercise should be undertaken in respect of SoCGs with LCC and 7000 Acres</p> | <p>7000Acres believe the weight of adverse effects, particularly for such topics as Human Health and Wellbeing should feature much more prominently in the Examination. As a dimension, this has not been thoroughly explored, and the consequences of living in and amongst a solar city have not been explored. The net result is that for this subject in particular both the weight has been insufficiently considered, and the absolute impacts have been scarcely examined.</p> <p>Furthermore, the Applicant asserts that the GHG impact of the scheme is beneficial and significant. This judgement is made without any objective evidence beyond a superficial baseline comparison with CCGT, omitting to consider the scale and flexibility of contribution the energy provided by dispatchable plant such as a CCGT can make, in contrast with the inherent intermittency of energy provided by the proposed scheme. While the weight should feature prominently in the decision, the quantum of benefit is limited, as has been described by 7000Acres in written submissions.</p> <p>In support of its position, the Applicant has repeatedly and deliberately sought to conflate "need" and "benefit" and has sought to avoid any scrutiny of the actual benefit that the scheme may deliver.</p> |

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| | | | <p>That “need” is established is not in dispute, but “need” is a distinct concept from “benefit”. Simple dictionary definitions offer:</p> <p>Need: require (something) because it is essential or very important rather than just desirable</p> <p>Benefit: an advantage or profit gained from something</p> <p>As an analogy, this can be equated to “need” being hungry (i.e. having a need for food), and “benefit” being the nutrition (or contribution) provided.</p> <p>Determining the contribution of the scheme can deliver to energy and decarbonisation can be equated to the extent to which that a particular food can contribute to alleviating hunger – which will have a direct bearing on what price (or adverse impacts) is worth paying for the contribution made.</p> <p>For instance, a Pot Noodle will provide a very different contribution to resolving an individual’s hunger than a nourishing, well balanced meal, and indeed both are priced accordingly.</p> <p>By dismissing any consideration of the contribution the Tillbridge scheme makes, the Applicant effectively argues for a licence to build anything of any size, regardless of benefit or impact, simply because need for clean energy has been established.</p> |
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| | | | <p>The Applicant has not engaged with, challenged or disputed the carefully referenced figures provided by 7000Acres to highlight the limited benefits their scheme will deliver, either in terms of volume of energy produced, or the issues with timing around when its energy is delivered in the context of matching UK system demand. It is clear therefore that the Applicant simply seeks to avoid any direct assessment of the contribution the proposed scheme makes to the energy system, and by extension, to decarbonisation.</p> <p>The contribution must therefore be properly considered to be assess the planning balance, and quite separately to the establishment of need. The Applicant appears to deliberately avoid this.</p> <p>With specific relevance to this question, in their response to Q2.1.19 [REP5-033] the Applicant asserts that “need and benefit are not two separate things”, and yet then refer to paragraph 3.2.8 of NPS EN-1, extracting the text stating “the Secretary of State should take into account... its potential benefits including its contribution to meeting the need for energy infrastructure,” The text is therefore explicit, i.e. that benefits and contribution to meeting need should be considered. Nowhere is there an exclusion to this, simply given that need has been established.</p> <p>In the same response, the Applicant asserts that 7000Acres are in some way criticising the policy framework. This is not the case; the Applicant is wrongly and unfairly projecting such a criticism to deflect from the</p> |
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| | | | <p>reality that the Applicant is seeking to avoid any scrutiny of the benefit that the scheme may produce. In doing so the Applicant is effectively seeing to take advantage of the policy framework in a way that will provide maximum advantage to the Applicant and investors, despite the scheme providing limited benefit and, in doing so, riding roughshod over the local communities affected by being dismissive of concerns over impact.</p> <p>It is obviously in the interest of the Applicant to overstate benefits and understate any impacts, and that is exactly what they have done throughout the course of the material provided during consultation and examination.</p> <p>It is clear to 7000Acres that the absence of scrutiny over the actual benefits of the proposed scheme will amount to a serious flaw in the Examination process, simply because the Applicant has been allowed to wrongly assert that “need” is the same as “benefit”.</p> <p>Overall, the assessment made by the Applicant that the scheme is beneficial and significant should not be accepted owing to the superficial and limited judgement applied by the applicant’s representatives.</p> |
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