Scopwick Parish Council Response to Springwell

20054456

Good afternoon,

My name is Marc Williams, as Chairman of Scopwick & Kirkby Green Parish Council I am representing our wonderful community.

As you will have seen from the number of people who registered to be Interested Parties the overwhelming feeling in this community is that Springwell Solar is the wrong solution in the wrong place. Over the last 18 months we have constantly sought the views of our community, and the overwhelming majority are totally against this proposed solar factory.

We are here today because our community is under threat — and it's time we called it out for what it is: an attack on the best farmland, our community and the environment by speculators.

Solar factories are being pushed onto our doorstep by developers who don't care about our community or the wider county of Lincolnshire — they care about lining their own pockets. They dress it up with words like "green energy", "sustainability" and "biodiversity net Gain" but make no mistake, this is nothing more than industrialisation of the countryside, pure and simple

It is also very clear that the current owners of Blankney Estates have turned their backs on farming and their reputations of being good landowners.

This farmland is some of the best in Britain — in fact some of the best in the world. An Estate with an extremely rich history. Mr Billy Parker and his son Eric worked this land creating the current estate.

In the last few years, the Estate was successful in gaining a DEFRA grant to help with irrigation. There are farms across the UK who would give their right arm to have the irrigation provided to Blankney Estates. Is the planning Inspector and the Government going to allow EDF and the current farm management to destroy over 100 years of successful farming?

Once the fields are carpeted under glass and steel, we won't get them back. At a time when food security is more critical than ever, we should be growing crops, not growing profits for big corporations. There are suggestions that at the end of 40 years the land will be handed back to agriculture. We all know this is nonsense, the developers can't demonstrate a single site where this has happened. However, there are many sites across the world that have been left blighted by industry and it will never be decontaminated and return to its original state.

There is clear evidence that highlight quite clearly the potential damage to the land. A key point we would like to raise is what bonds or insurances will be put in place to cover decommissioning and any other disasters that occur due to this development in the 40-year lifecycle? It is also recognised that the batteries will need to be replaced several times and Panels too. What will happen to this hazardous waste?

On the surface, solar energy is portrayed as a clean green solution. The reality is very different. As we are all aware the majority of Solar Panels and much of the equipment for the Batteries comes from China and mining in Africa.

EDF have been pushed to disclose where the panels and other materials come from, and they have declined to comment. EDF Renewables has historically worked with large, Chinese panel manufacturing companies like LONGi, JA Solar, Trina Solar, and Canadian Solar. Many with suspected links to forced labour camps.

In 2025 we should be better than this! No product should be sourced from markets where slave labour is prevalent.

This application is a scar on the area, it will destroy a significant amount of prime farmland, it will forever spoil the tranquil landscape that so many of us enjoy and it will have a significant impact on many people's wellbeing.

We would like to address a few key points.

Cumulative Effects
We support schemes that promote the drive to a greener future. This and the other proposed schemes in this area do nothing to support the environment or enrich our lives. Whilst the inspector is only examining Springwell, it is incumbent on the planning team to not consider this application in isolation, within a very small radius there are a number of biomass facilities, more planned, there are several small solar sites already in operation, one NSIP Solar facility already granted in Heckington Fen, 3 more including Fosse Green, Leoda and Springwell at the planning phase, several large scale BESS sites, one associated with Springwell and at least another 3 also in the planning phase and finally a National Grid Substation at the planning phase. This will result in the decimation of 10,000 of acres of prime farmland and will turn a beautiful landscape into a huge industrial complex. The Planning Inspector must take onboard the cumulative effects of all these applications on North Kesteven and the wider Lincolnshire County. A county that relies heavily on agriculture and tourism. If consent is given the impact on both will be devastating. Approximate 9% of farmland will be lost.

Battery Storage & Risk to Aquifer
The BESS will be sited above a primary aquifer and within a reasonable proximity to RAF DIGBY and the high powered fuel line known as CLH Pipeline System.

Once again EDF are being very vague on detail and using the Rochdale Envelope principal to avoid scrutiny. We don't need to investigate the annuls of history to see the impacts of BESS fires. There are no details in the application that mitigate the real risk

we will face. Even the minimal detail provided by EDF is an attempt to minimise any potential risk. For example, enough water to suppress a fire for 4 hours. The evidence on BESS fires shows fires lasting significantly longer than 4 hours, more likely 4 days. We request the inspector is given clear evidence of BESS fires being extinguished within 2 hours as per the applicants BESS experts claim. This is false.

NFCC 2023 guidelines also specify there should be a minimum of 6 metres spacing around each Battery container. The applicant is stating 3 metres. Baker Engineering and Risk Consultants, Inc. also highlight the need to have considerable separation between each BESS container. There has been some discussion in the insurance industry about spacing BESS containers up to 25ft apart(7.62m). This is required to help prevent the potential of thermal runaway. In the application the applicant is ignoring the recommendation on container spacing. A typical Fire appliance in the UK is just under 3m wide with doors closed so it would require approx. 5 metres clearance in order for firefighters to exit the appliance safely. There is also a requirement to get as close as possible to the fire. An appliance carries 1500 litres of water and depending on the type of hose deployed this would last somewhere between 2-20mins.

We would like to raise some important considerations regarding the dangers associated with BESS

While BESS offer limited benefits for energy storage — they also present significant risks. The applicant expresses the credibility of their independent expert, but dismisses the expertise of Dr Edmund Fordham Fellow of the Institute of Physics, Dr Wade Allison Professor of Physics, Fellow of Keble College, Oxford University and Professor Sir David Melville CBE Professor of Physics, former Vice-Chancellor, University of Kent. Three gentlemen that know what they are talking about and should be taken seriously. They also have no vested interested and are not gaining financially for their critique of BESS safety.

It appears that in many cases the experts used by the applicant are far too closely linked to the Green Energy Lobby and in no way can be considered independent and impartial.

We would like to highlight the report - Safety of Grid Scale Lithium-ion Battery Energy Storage Systems produced by Dr Edmund Fordham, Dr Wade Allison and Professor Sir David Melville CBE Professor of Physics. In summary they say:-

- Despite storing electrochemical energy of many hundreds of tons of TNT equivalent, and several times the energy released in the August 2020 Beirut explosion, these BESS are regarded as “articles” by the Health and Safety Executive (HSE), in defiance of the Control of Major Accident Hazards Regulations (COMAH) 2015, intended to safeguard public health, property and the environment. The HSE currently makes no representations on BESS to Planning Examinations
- Li-ion batteries can fail by “thermal runaway” where overheating in a single faulty cell can propagate to neighbours with energy releases popularly known as “battery fires”. They are uncontrollable except by extravagant water cooling.

They evolve toxic gases such as Hydrogen Fluoride (HF) and highly inflammable gases including Hydrogen (H2), Methane (CH4), Ethylene (C2H4) and Carbon Monoxide (CO). These in turn may cause further explosions or fires upon ignition. The chemical energy then released can be up to 20 times the stored electrochemical energy. Acute Toxic gases and Inflammable Gases are "dangerous substances" controlled by COMAH 2015. Quantities present "if control of the process is lost" determine the applicability of COMAH.

- They believe that the approach of the HSE is scientifically mistaken and legally incorrect.
- No existing engineering standards address thermal runaway adequately
- Lacking oversight by the HSE, the entire responsibility for major accident planning currently lies with local Fire and Rescue Services. Current plans may be inadequate in respect of water supplies, or for protection of the local public against toxic plumes.
- The scale of Li-ion BESS energy storage envisioned at "mega scale" energy farms is unprecedented and requires urgent review. The explosion potential and the lack of engineering standards to prevent thermal runaway may put control of "battery fires" beyond the knowledge, experience and capabilities of local Fire and Rescue Services.

The most immediate and well-documented risk is fire. BESS typically rely on lithium-ion batteries, which are highly energy-dense and, under certain conditions, prone to a phenomenon known as thermal runaway. Once initiated, thermal runaway can cause a fire that is extremely difficult to extinguish with conventional firefighting methods. Some BESS fires have burned for days, releasing not only heat but also hazardous gases into the surrounding environment. This can not be dismissed by Paul Gregory the applicants BESS expert.

The second critical danger: toxic emissions. When these batteries burn, they release substances such as hydrogen fluoride — a chemical that is acutely toxic and can cause severe health effects even with brief exposure. This poses a major risk not only to on-site personnel but also to nearby communities, especially if installations are sited near residential areas or public spaces.

Moreover, there is a well-established explosion risk. In several documented cases globally, this has resulted in catastrophic explosions, injuring emergency responders and causing extensive property damage.

From a planning perspective, the proximity to property in Navenby, schools, and critical infrastructure such as MOD Waddington & MOD Digby becomes a vital issue. Inadequate separation distances could expose the public to unacceptable levels of risk should a failure occur.

As highlighted in their report the professors identify concerns around, response capabilities. We live in a rural community with limited fire resources. Are the Lincolnshire fire services fully equipped or trained to deal with large-scale battery fires involving hazardous materials whilst at the same time dealing with RTA and the daily

challenges facing the fire services? A reliable source at Lincolnshire FR has informed us that very few of the firefighters have had any experience of BESS fires. Training is typically e-learning on a 3 year cycle. It is very easy to miss the training resulting in no training until the next cycle. Typically provided there were no other incidents it would take an appliance upward of 15 minutes to reach the Springwell BESS from Lincoln or Sleaford.

This BESS is located on the Lincoln Heath above a significant aquifer. Any pollution entering the aquifer would be catastrophic. Is the applicant guaranteeing no pollution can enter the aquifer? No they are not. Whilst the BESS is not needed, the planners should insist that the entire site is bunded guaranteeing contaminated fire water can not get in the aquifer. This whole process will be hugely damaging to the natural environment.

Risk of BESS Contaminating a Major Aquifer:

Chemical Leaks and Groundwater Contamination:

- BESS units contain large quantities of hazardous materials, including heavy metals like lithium, cobalt, nickel, and manganese.
- In the event of a fire, thermal runaway, mechanical damage, or even normal aging and corrosion, these chemicals can leak from damaged battery cells.
- If the BESS is located above permeable soils — and especially above a major aquifer recharge zone — leaked contaminants could infiltrate the groundwater system.

Specific Substances of Concern:

- Lithium salts can be highly mobile in water.
- Nickel and cobalt compounds are toxic and can persist long-term in groundwater.
- Electrolyte fluids in many battery systems are flammable, toxic, and water-soluble.

Risk Magnitude:

- Contamination of an aquifer could be permanent or very long-lasting, given how slowly groundwater systems move and recharge.
- Cleanup of aquifer contamination is extremely expensive and often technically impossible without years or decades of remediation.
- Drinking water supplies, agriculture, and ecosystems depending on that aquifer could all be affected.

Key Planning Considerations:

- Location matters: **BESS should not be sited above sensitive groundwater zones**
- Containment measures: Systems such as *double-lined concrete pads*, *spill containment basins*, and *impermeable membranes* are critical to prevent leakage.
- Emergency drainage controls must be in place to contain firewater runoff, which itself can carry pollutants.

Finally, there are long-term security concerns. As critical infrastructure, BESS facilities are potential targets for cyber-attacks, which could lead not only to service disruptions but also to deliberate triggering of dangerous failures. This must clearly be a concern for

nearby MOD facilities. These concerns have been recently highlighted by security services in the US.

In conclusion we feel that the risk posed by BESS are real and evidenced by many BESS fires over the years. The applicant will try and downplay the risk but they also don't live in the vicinity and won't have to deal with the consequences.

On this risk alone the inspector should reject this application.

Aquifer contamination
There is real risk of a BESS fire contaminating the aquifer. This would lead to serious groundwater contamination.

Contamination of the aquifer would be permanent or very long-lasting. Cleanup of the aquifer would be extremely expensive. Are EDF guaranteeing to do this?

Land, Soils and Groundwater
We are really concerned with 2 main factors that need addressing

PFAs - Forever Toxins
There is documented evidence that chemicals leach from solar panels. With 1.5 million panels proposed this has the potential to create a significant amount of contamination. This can't just be brushed aside by EDF. Can they provide guarantees that there will be zero contamination of the land?

Potential Effects of XLPE Cables on Water Aquifers

It is very clear from the application that there is going to be a significant amount of cabling buried across the site. The applicant has only proposed to remove surface-based material at the point of decommissioning. This will leave a huge amount of contamination underground. XLPE cabling has many potential contaminants, and this should not remain in the ground above a primary aquifer. We understand the applicants desire to only remove surfaced based material, this is cost calculation. It is the planning inspectorate's responsibility to ensure the applicant is not permitted to leave contamination below ground. No matter what the costs, it is the responsibility of the applicant to return this land to its previous state by removing all contamination even materials that were buried. What are the risks?

Flooding
During periods of rainfall, the water table rises quickly causing flood issues in the village. The impact of millions of glass panels, the impact of the piling into the ground, with the real risk of damaging old clay drainage pipes, the alteration of drainage with concrete and hardcore, significantly increases the risk of the village flooding. We have seen absolutely no acknowledgement of this or detailed mitigation. Will EDF take responsibility for properties being flooded?

Landscape & Visual Impact
There is no reasonable person who can say this development won't have a devastating impact on the landscape. The Steeples & Stepping Out walks will be destroyed. This will no longer be a beautiful countryside. It will be an industrial complex. The impact on the community's wellbeing will be significant. This part of Lincolnshire is all about landscape and views. This development will be a 40 year scar.

Community Benefit
If this application and the other applications that are coming quick and fast are foolishly granted, then this area will be a construction site for nearly 10 years. There will be traffic, noise, dust impacting so many people. Whilst we don't want the application, as a Parish we need to consider what benefits we could negotiate for our community. The applicant froze when we suggested free electric for every house within the catchment for the lifetime of this development. They feel that is an unreasonable request! Is it really? When you consider the damage, they are causing to our communities.

The applicant suggests a community benefit fund which would provide up to £400 per megawatt of installed capacity for communities to spend on local projects. Our first comment is this figure should be considerably larger and it should be managed directly by this community, it should also be index linked and should be payable from the point the first shovel enters the ground. We should administer this for our community's benefit!

This is not a harmless development, it will tear up the landscape, disrupt wildlife habitats, and replace living fields with dead panels. It makes no sense to cover up fertile farmland with energy projects that could easily be placed on rooftops, brownfield sites, and less sensitive land.

The truth is simple. Solar factories in Lincolnshire are not about saving the planet. They're about exploiting cheap land, exploiting weak planning laws and enabling greedy landowners to make money.

Let's be clear: Lincolnshire's strength is in its land, its food, and its beauty. We should protect it fiercely — for ourselves, for future generations, and for the nation.

Thank you.

Submission ID: 36512

Scopwick & Kirkby Green Parish council thank the inspector for the detail presented in the Rule 8 Letter. We have submitted additional concerns around the BESS, risk to the aquifer and overall impact on our community. This development should not be granted. It is far to large and will do so much longterm damage to this area. The landscape will be forever changed, farming will be destroyed in this community, the real risk of BESS fires and potential contamination of the aquifer is real. The amount of XLPE cabling that will be required to be buried. This is a new hazard that has been identified. These cables will degrade leaving microplastics in the soil along with other contaminates. It is incumbent on the Inspector not to permit this deliberate contamination.