Submission ID: 36521

Q1.2.1 It is clear that there has been no desire to look for alternative brownfield sites. There are plenty of old industrial areas and also areas closer to where the power is consumed in the south.
Q1.3.2 There is clearly no honest assessment of the potential risk of BESS fire. The applicant stating 2 hours of fire is dishonest. It is clear from all literature that a BESS issue is expected and its simply a calculation on the severity. Fire resources in rural lincolnshire are totally lacking. The spacing of the containers are inadequate
Q1.15.2 /Q1.6.6 /Q1.6.9 & Q1.9.6 - Inspector needs to examine the harm that will be caused during the 40 years of cabling left in the ground and equally importantly the applicants desire to leave them in situ at decommissioning phase
Potential Effects of XLPE Cables on Soil & 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?
Leaching of Additives or Degradation
XLPE contains not only polyethylene but also additives like antioxidants, cross-linking agents (e.g., peroxides), and sometimes flame retardants. If XLPE cables degrade due to aging, heat, or environmental conditions, small amounts of by-products or additives leach into the soil.
Physical Intrusion and Disturbance
Cable laying will disturb soil layers, changing natural water flow paths and increasing turbidity or altering recharge rates to aquifers. In large-scale installations, cables may act as physical barriers to water flow, modifying hydrology.
What standards are being implemented to ensure there is zero impact on the aquifer? Are any of the following actions being taken? Protective measures such as bentonite layers, encasement, or double sheathing to prevent leaching or intrusion.
There has been a concerted effort to remove microplastics from rivers and oceans. Why do EDF feel it is acceptable to pollute the land with microplastics from XLPE?
How Microplastics Form
- Underground cables degrade slowly due to oxidation, hydrolysis, and mechanical stress.
- As the outer sheath degrades, it can flake or fragment.
- Particles leach into soil or aquatic systems if exposed.
- In high-voltage conditions, water treeing weakens the polymer matrix, leading to internal cracking.
- Cutting, stripping, or mishandling cables during installation or recycling can release particles.
- Improper disposal or abandonment of cables increases the risk of long-term environmental fragmentation.

A 2021 review on plastic infrastructure noted that polyethylene-based cables and pipes are long-term contributors to soil microplastic pollution, especially if not properly disposed of.
Mitigation Measures
1. Use of ducts or concrete encasement to prevent direct soil contact.
2. Laying impermeable barriers (like clay liners) to stop contaminant transport.
3. Installation of groundwater monitoring points to detect any changes post-installation.
4. Ensuring old or damaged XLPE cables are not left in-situ where degradation could occur.
Q1.10.3 Q1.10.11 Good Design/Landscape Character - applicant is radically changing the landscape. There are no Good Design principals. The applicant states that they dont believe there is adverse impacts on local people. Again assessment performed by RSK who are not independent. The local community needs to be listened to and the sense of real loss needs to be understood
Q1.12.6 Ethical Procurement - This applicant has history of purchasing from Chinese Businesses with direct links and published links. In addition in 2025 a site managed by EDF in North Wales was raided and a significant number of workers were arrested due to there legal status in the UK. This is further demonstration that the applicant plays fast and loose with rules.
Q1.13.6 Outline Travel Plan - this is a work of fiction. How would the management of routes be effectively managed and what penalties would be implemented? How do you in reality prevent a site worker in his mondeo at 6:30am from taking the most direct route to site?