

COMMENTS IN RESPONSE TO EX Q1 TO THE PLANNING INSPECTORATE FOR DEADLINE 2

1.0 Alternative Sites

1.1 In **Responses to First Written Questions (ExQ1)** Q1.2.1 the Applicant tries to justify it's site selection and states alternatives were sought. In short, the Applicant appears to set its own rules, such as *".... distance criteria from OHLs, which the Applicant determined should be no more than 3km."* Why 3km? The Applicant, in Table 1.2, uses 'environmental impact' as a reason to keep cable routes to a minimum. Given that the Applicant is not concerned about the environmental impact of 1200ha of solar panels for 40+ year, it is hypocritical that it is using a minimum cable length which will have an environmental impact for the time it is being laid (18 months?), to justify its site selection.

1.2 It is clear the Applicant has two reasons for refusing to properly explore reasonable alternatives to industrialising this part of Lincolnshire. Firstly, there is a sole willing landowner. Secondly, the Applicant states it has an agreed grid connection to the proposed National Grid substation at Navenby. National Grid are proposing the substation due to the number of new energy projects being proposed for the area. Each new proposed energy project is using the proposed substation as a major justification for its planned location. In short, the Springwell Applicant is using a proposed substation as justification and National Grid is using Springwell in it's justification. Given that there are 6 proposed energy projects planned for connection to the proposed Navenby substation, it would not be unreasonable to assume that National Grid would need certainty that a sufficient number were approved prior to proceeding itself.

1.3 Notwithstanding, the Applicant states that it is proposing grid connect dates in 2028 and 2030. Given that the proposed National Grid Navenby Substation, if approved, will not be operational until late 2029 at the earliest, how does Applicant plan to achieve this?

1.4 The Applicant's **response to the Cliff Villages Solar Action Group** is key in demonstrating what is the Applicant's motivation. Sections 7.2 and 7.3 of the Statement of Need [EN010149/APP/7.1] explain that there are *"insufficient rooftop and/or brownfield resources to deliver the required capacity of solar in the UK at either the scale or pace required or at an affordable cost....."* To the Applicant, the concern is merely financial; to the local population it is far more; cost to health, landscape, safety, well-being our entire way of life!

1.5 Regarding alternative sites, the following **paragraphs** are typical:

7.2.4 *Many distribution networks are in built up areas, away from areas of large natural resource potential. Geographical and technical constraints **may** therefore arise This **may** materialize as significant cost*

7.3.2 *Many decentralized sites **may** be unable to Distribution networks **may** also not be able to distribute the energy generated*

7.3.3 *Many sites **may** simply not be suitable.*

May this, may that. Has the Applicant actually explored any of these "may" alternatives, particularly some of the vast warehousing in many parts of the Country to support the on-

line ordering industry? For example, only some 15 km away on the outskirts of Newark there are a number of large new commercial premises being erected; there is a vast amount of roof-space available just on this one site. An industrial development on an industrial site instead of the proposed industrialization of a large part of the Lincolnshire countryside. In short, with a single willing landowner happy to lease his land, the Applicant has clearly made no real effort to look elsewhere.

1.6 Finally, 8.6.1 of the Statement of Need states: *“The east Midlands has a history of using its available natural resources to power the UK, firstly through coal and then through natural gas, piped from the UK Continental Shelf for local industrial and power generation use. The region is well positioned to use its natural resources and existing infrastructure to support the UK’s energy needs for a third time, through the development of the proposed large-scale solar and storage scheme”* The only ‘natural resource’ part of this statement that is correct is coal. Piping gas from the North Sea is NOT using the region’s natural resources NOR will using the landscape for solar generation. Indeed, the proposed development will permanently destroy a large area of its greatest natural resource, the land to feed the nation.

2.0 Climate Issues

2.1 Responses to First Written Questions (ExQ1), Table 1-5 Q1.5.3 details the Applicant’s comments regarding project emissions. In Chapter 8, Environmental Statement, Climate, Table 8.5 the Applicant assumes the solar PV panels will all last the life of the development (40 years) yet most manufacturers suggest 25 years. Indeed, the effects of weather and delamination alone will most likely require every panel to be replaced prior to 40 years. If every PV panel does need replacing at least once it adds over 1 million tCO₂e to the CHG emissions. Table 8.5 also has the service life of BESS (batteries?) as 17.5 years and transformers at 40 years. The proposed BESS to the South of Green Man Rd, Navenby, is planning on a battery life of 5-15 years with planned replacements at 10 years and planned transformer replacements at 25 years (Chapter 11, Waste, Table 11-9 of Planning Application 25/0491/FUL to NKDC). Given that the majority of developers state the most conservative component replacements to make their GHG calculations as attractive as possible, it is unlikely the proposed Navenby BESS component lifing statistics are significantly below reality. Therefore, this Applicant has underestimated the GHG emissions for component replacement throughout the life of the project.

2.2 Responses to First Written Questions (ExQ1), Table 1-5 Q1.5.4 again states the Applicant’s assertion that there will be an estimated saving of 9.6million tCO₂e. The Applicant continues to use the Combined Cycle Gas Turbine as a comparison to make the tCO₂e lifetime savings of the proposed development look misleadingly high. The Government are aiming for a 50% Net Zero grid by 2030 and totally net zero by 2050. Therefore, based on Government targets, the Applicant’s comparison must be with a 50/50% fossil fuel/green energy mix for the first 20 years then 100% green energy thereafter ie a mix of 25% fossil fuel/75% green energy across the proposed development. Hence, the Applicant’s statement (Chap 8, Para 8.7.19) that there will be a saving of 9.6 million tCO₂e is wrong. Given that solar is the most polluting green energy, this figure needs to be reduced by 75%; hence the maximum saving is 2.4 million tonnes. This does not however, take into account the Applicant’s gross underestimation of carbon emissions from component replacements, notably solar PV panels, which will reduce the figure further by at least a

million tCO₂e. It is worth noting in the recent House of Commons debate (Hansard: Volume 768 debated 5 June 25) Nick Timoney MP, stated that solar is 4 times more carbon intensive than wind and nuclear. He mentioned the Sunnica Solar Farm development in Suffolk, 2500 acres and 3 battery sites, that will actually increase carbon emissions.

2.3 To repeat my previous comment, the Secretary of State, in approving the Gate Burton Energy project, considered a Combined Cycle Gas Turbine an **inappropriate** baseline for comparisons.

2.4 In short, the Applicant has grossly underestimated the lifetime carbon footprint of the proposed development, has no clear plan in place for safe disposal of PV panels, batteries etc and has hugely inflated its project lifetime tCO₂e savings by using a totally inappropriate gas cycle comparison.

3.0 Use of BMV Land

3.1 **Responses to First Written Questions (ExQ1)**, Table 1-9 Q1.9.9 is an attempt to justify use of BMV land. Following an amendment in Dec 24, the NPPF Footnote 65 states: "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality." Although the reference to consider food production has been deleted, the Applicant has still failed to adequately demonstrate that poorer quality land is being used in preference to BMV. The use of the land is solely driven by the single landowner offering it up. The Applicant could easily limit development to the poorer land within the order limits in the DCO. The Applicant (Table 1.9) goes on to state: "*.. the solar farm development forms part of a diversification strategy for the Blankney Estate,*" Why have we not seen a copy of this 'diversification strategy'? Diversifying from an agriculture landscape to an industrial one is not justification for the use of BMV land. The response given in Table 9.1 goes on to say: "*The Applicant has demonstrated that total avoidance of BMV land is not feasible*" If the Applicant only used non-BMV land within the order limits of the DCO, there would still be a substantial amount of power generated; indeed, numerous solar farms in the UK are less than half the size of the proposed development and are clearly commercially viable. So the Applicant has NOT demonstrated that avoidance of BMV land is not feasible.

4.0 Outline Battery Safety Management Plan (oBSMP)

4.1 **Responses to First Written Questions (ExQ1)**, In Table 1-2 Q1.3.2 the Applicant states that the "*ERP [emergency response plan] will be developed in accordance with NFCC guidance and additional guidance and best practice at the time.*" Given that the Applicant is not following current NFCC guidance with respect to battery container separation, what confidence is there that guidance will be followed in the future? In trying to justify not even having a draft ERP the Applicant states "*It is standard practice for an ERP to be developed post planning consent to facilitate a tailored, effective and safe emergency response at the particular site.*" Saying it is "standard practice" is not a reason for having no outline ERP in place. Surely the requirement for an ERP must be the same as that for an outline BSMP?

4.2 Indeed, regarding separation, the BESS Plume Assessment Para 3.8.13 states "*a jet type fire of the vented hydrogen has also been modelled with the industry threshold of 6.3kW/m² being reached at distance of 5m from the source.*" Yet container spacing is proposed to be 3m and therefore an adjacent BESS container would be well within the range of a vented

hydrogen jet. The current NFCC Guidance is 6m. Why cannot the Applicant simply state that the proposed development WILL comply with the extant guidance/regulations at the time with any UK guidance/regulations taking precedence?

4.3 In Para 3.8.10 of the Plume Assessment the Applicant states *"It is anticipated that the emergency response would take no more than a few tens of minutes to attend the site"*. Has the Applicant actually spoken to Lincolnshire Fire & Rescue (LFR) about this? What is the definition of "a few tens of minutes"? 10, 20, 30, 40 ? It is assumed the fire response would come from South Park, Lincoln. It surely cannot be difficult to estimate a time. Has the Applicant discussed resources with LFR? Essex Fire Brigade sent 23 appliances to the East Tilbury BESS fire. Lincolnshire Fire and Rescue have 48 station-based fire engines covering an area of 5921 km²; the likelihood they could field a similar number is unlikely.

4.4 **Responses to First Written Questions (ExQ1)**, Table 1-14 Q1.14.3 comments on the outline drainage strategy. It is unbelievable that, given a common concern amongst interested parties is the risk of contamination entering the protected aquifer, there appears to be no mention of toxic firewater in this Table. Regarding firewater containment the Applicant's Drainage Strategy states: *"This will likely be via use of impermeable membranes and a bung and penstock system which can be utilised to stop the surface water discharge offsite within the onsite drainage network."* What does "likely" mean? What alternative is there to use of an impermeable membrane? What material will the membrane be made off? What precautions will be put in place to ensure the membrane is not inadvertently damaged during the 40 years of operations? Why is there no draft design proposed to give some confidence that the protected aquifer is NOT at risk? Given that there will be gravel around each BESS container, how will that gravel be safely removed if contaminated? Where will any contaminated water be disposed of? Does the Applicant not understand that many of the local population are in **fear** of a BESS fire and its consequences? It is time the Applicant started being clear about some of these significant issues.

4.5 **Responses to First Written Questions (ExQ1)**, Table 1-9, Q1.9.9 states that the BESS design principles and the ERP *".... Will confirm that the Lincolnshire Fire & Rescue Service (LFR) are expected to employ a defensive strategy ie. Only boundary cooling"* This is not new, cooling boundaries around BESS containers on fire is standard practice but has still resulted in millions of litres of water being used in real incidents. West Yorkshire Fire & Rescue recommend boundary cooling and in a letter regarding planning for a proposed 200 MW BESS in Leeds (West Yorkshire Fire & Rescue 23/00450/FU dated 20 March 2023), recommended that there should be sufficient water available to fight a fire using 2 hoses each delivering 1900 litres/minute for 24 hours, a total of almost 5.5 million litres. Given that this BESS will sit on a prime drinking water aquifer it would be reasonable to expect the Applicant would be ultra cautious regarding the risk of contamination; clearly not.