

Submission ID: 36836

Please see attached document for comments relating to deadline 2

Points related to REP1-076 Applicants proposed sites for accompanied visits.

I note the applicant has not included the site suggested in PD1-005 in its list of suggestions. I urge the inspectors to have this added to the agenda for the site visits for all the reasons listed in PD1-005

Points related to the timetable

As stated during the preliminary meeting the timetable for examination is rushed and does not give time for interested parties to read, understand and respond to the barrage of documentation. It seems the application is being fast tracked and inspectors are just pressing on regardless of concerns raised.

As an interested party I had two weeks only from the submission of over 200 documents at deadline 1 to respond to any at deadline 2. As you will know yourselves many of the documents run to hundreds of pages in themselves.

It is completely unreasonable to only allow this small amount of time and it seems out of kilter with the rest of the application process so far which has taken a number of years.

It feels like the process is designed to disadvantage interested parties and discourage them from participating. It is only the applicant with their teams of lawyers or county councils with departments full of staff who are able to comply with the timetable. I also find it hard to believe that two inspectors are able to review this much information in the time allowed. Why the desperate rush all of a sudden?

This process should be extended to allow sufficient time for interested parties to properly contribute. A 4 week pause should be introduced. Subsequent NSIP examination processes should draw up a more realistic timetable taking account of this experience.

Points related to Document 7.14.2 Draft BESS safety management plan

Document 7.14.2 as amended by the applicant at deadline one discusses the BESS safety management plan.

Overall this is still just a list of things that the applicant wants to deal with later in the process. This does not seem too be a sensible approach and does not give the inspectorate the detail required to establish the safety of the installation prior to making its recommendation on the application.

I understand it is the desire of the applicant not to make decisions on the specific batteries or panels to be used in the construction until after the plan is accepted but in my view that just makes things worse. What exactly will the inspectorate be agreeing to? How can it be established that something not yet chosen will be suitable and more importantly safe. The inspectorate should establish this before making its recommendation.

At section 5.3 an Emergency Response Plan is discussed. It is suggested here that this document will not be written until just prior to commencement of construction and only then be in consultation with Lincolnshire Fire and Rescue service.

Some bullet points of items they may add to that plan at that time are then listed.

This approach is far too vague and far too late in the process, it doesn't engage the minds of the Fire and Rescue service to actually think about and actively contribute to the discussion and the documentation until its far too late to have a voice that the inspectorate can take into account.

I note the last meeting between the applicant and LFRS was back in July of 2024. I also note that the applicant is not looking to collaborate with LFRS further at this stage but that Lincolnshire Fire and Rescue are keen for further involvement during the examination phase (point 20.9 of Lincolnshire County Councils Local Impact Report)

I urge the inspectorate to:

1. Insist the BESS safety management plan and the Emergency Response Plan is completed and agreed between the parties during the examination period and be open to scrutiny in the same way other documents are.
2. Specifically ask the head of Lincolnshire Fire and Rescue to go on record to state that they are happy with the BESS safety management plan and the Emergency Response Plan and are ready to assume the responsibilities.

Points related to 000527-8.13 Response to Relevant Representations

In response to Scopwick & Kirkby Green Parish Council's points raised on decommissioning and the need for a reclamation bond the applicant on page 105 of its document states it will have funds set aside to decommission the development. It is in the public interest to ensure this is handled appropriately.

Please will the inspectorate ask further questions on this subject to establish:

1. The overall estimated cost of decommissioning.
2. The name and company number of the limited company that will hold this decommissioning reserve and under which section in its published accounts that this will be visible.

In response to RR-137 the applicant responded with some general statements rather than addressing the individual points. In relation to points raised on the increase in traffic through the construction period the applicant states on pages 179 and 180 that the increase is not significant. I refer the inspector to point 6 of RR-137 and in particular point 6 (d) where it is highlighted that there would be an increase of 133% to HGV traffic through the village of Scopwick. Please will the inspector ask the applicant how an increase of 133% can be considered not significant when it is accepted that scientifically speaking any increase or decrease over 10% is considered significant.

This is the road where [REDACTED] and walk along with my [REDACTED] and having 133% more HGV traffic going along it is certainly significant to me and my neighbours. Its all to easy for some corporate lawyers to just ignore this and write it off as insignificant but I think it should be acknowledged and highlighted rather than ignored and then taken into account in the overall planning process.

Points related to REP1-076 Applicants proposed sites for accompanied visits.

I note the applicant has not included the site suggested in PD1-005 in its list of suggestions. I urge the inspectors to have this added to the agenda for the site visits for all the reasons listed in PD1-005