From: David Crampton

To: Springwell Solar Farm

**Subject:** RE: EN010149 Springwell Solar Farm

**Date:** 04 August 2025 10:44:33

## **Dear Sirs**

At the Planning Inspectorate meeting, 15 to 17 July 2025, I suggested the Inspectorate should ask the applicant if they had complied with the Rochdale Envelope and NSIP planning guidance to consider a "cautious worst case". The applicant's solicitor answered "YES". No details were offered.

I consider that the Inspectorate should ask the applicant to provide evidence to substantiate their "YES" answer.

It was clear from the meeting that LCC and NKDC considered that the applicants response to "Cumulative Effects" was on the "Light site" and disagreed with their conclusion "minimal effects"

I recall the Applicant raised the following points: -

- They only respond to information they have
- They will update their proposals as schemes develop
- They don't have sufficient information to access all the schemes on the NESO TEC register.

My conclusion is that the applicant has not considered the "worst case" and it's not credible for such a high profile and experienced applicant to say they are not aware of the big picture.

It was noted and agreed by all parties that there are no facilities in the UK that can recycle solar panels.

The applicant's view was that recycling facilities would develop as the use of solar panels increased.

This presumption is not a credible response and assumes that business will see an opportunity worthy of investment in the future. There is no evidence to support this assumption. Furthermore, this approach does not support the UK Parliament Post, Horizon scanning, The circular economy and sustainable manufacturing, published Tuesday 15 April 2025. The Overview of the post says:-

## Overview

The Government has appointed an independent <u>Circular Economy</u> <u>Taskforce</u> to advise on the co-creation of a circular economy strategy.[1] This is intended to start the transition away from the traditional linear economy that operates on a "take-make-dispose" basis. The circular economy (CE) model promotes using products and materials for as long as possible through local maintenance, repair, reuse, refurbishment, remanufacturing, and recycling (<u>PN646</u>), as well as lowering consumption and <u>reducing resource use.[2][3][4][5]</u>

Solar farms and their associated infrastructure look like an unregulated and

uncontrolled environment and has been compared to the gold rush in North America at the turn of the last century. At the Inspectorate meetings the applicant has gleefully informed the meeting:-

- The presumption is in favour of the applicant
- They don't have to consider food production
- They have not considered alternative location that would not use productive agricultural land.

In conclusion I suggest that the applicant should be challenged and required: -

- To consider a "cautious worst case" for all aspects of their proposal
- Should not be allowed to import products into the country that have no credible recycling facilities available, or they are compelled to return the products to the country of origin
- As envisaged by the UK government guidance consider sites and locations that do not use productive farmland

Regards
David Crampton