

COMMENTS IN RESPONSE TO EX Q1 TO THE PLANNING INSPECTORATE FOR DEADLINE 3

These comments refer to the Applicant's Response to Deadline 1 Submissions, Rep2-023 (EN010149/APP/8.20 dated June 2025)

1.0 Landscape & Visual Impact:

1.1 Response to Deadline 1 Submissions, LIR 17.21 states *"The Applicant has acknowledged That there would likely be a significant effect on landscape character locally but does not consider that the landscape change identified has the potential to result in a significant effect on landscape character at a wider regional scale."* Given that both NKDC and LCC strongly disagree and DO CONSIDER that there will be a wider regional effect, I trust the Planning Inspectorate will take due note of this and give weight to those who know the region and are far better placed than the Applicant to assess the impact.

1.2 In Response to Deadline 1 Submissions, LIR 17.21, the Applicant states *"The openness, tranquility and agrarian character experienced at a regional scale across the majority of the NCA and LCT would remain unaltered by the Proposed Development"*. This Proposed Development alone will have a very significant effect in the eyes of the people that count, the local population. When the cumulative impact of the other proposed/approved solar farms and stand alone BESS are taken into account, the effect will be immensely damaging to the area. Both NKDC and LCC disagree with the Applicant. The big difference here is people on the local councils live and work in the area and understand the impact whereas those representing the Applicant do not. Indeed, given the apparent lack of understanding shown, it appears likely that the Applicant's representatives are all from urban backgrounds.

1.3 Response to Deadline 1 Submissions, LIR 17.26 states *"The Applicant does not agree with this observation"* So much of the Applicant's documentation is subjective. The Applicant repeatedly understates the impact the Proposed Development will have on the area. The NKDC LIR has been well thought through and the Applicant just dismisses large parts of it based, primarily, on opinion.

1.4 Response to Deadline 1 Submissions Para 1.10.4 states, *"The Applicant acknowledges that residents of nearby villages may experience views of the Proposed Development when travelling through the wider landscape but does not consider this to be an effect on the character of the settlements. The Applicant considers this to be visual effect, not an effect on landscape character."* Why can Applicant not be honest and admit the impact of the Proposed Development; lovely villages surrounded by glass for the rest of peoples' lives; house prices most likely dropping significantly (even if buyers can be found), FEAR over BESS safety and contamination of drinking water, MAJOR visual and character effect on the landscape character.

1.5 Further to LCC's comment (Response to Deadline 1 Submissions LCC 1.10.3) the Applicant states *"... large scale solar development would become a frequent and locally characteristic feature of the NCA, LCT and LCAs in a similar manner to which 'utility infrastructure', 'RAF installations' and mineral workings are recognized in the North Kesteven Landscape Character Assessment at present. However the Applicant disagrees that solar development would become a 'defining' land use"* Utility infrastructure in Lincolnshire is minute in scale in comparison to the industrial development being proposed; there were

some 49 airfields in Lincolnshire during WWII – positioned out of necessity due the flat landscape and proximity to the East Coast – there are now 4 operational RAF airfields in the County; and mineral extraction needs to be sited where the minerals are located. Whereas all these 3 activities needed to be sited in Lincolnshire, the proposed development does not. Regarding the Applicant's disagreement that solar development will become a defining land use, how many thousands of hectares would it take for the Applicant to finally realize the devastating cumulative impact? Of course the landscape is defined by the land, which in the region is predominantly agriculture; LCC and NKDC are concerned that that traditional farming landscape is being significantly eroded by the huge scale of the numerous solar projects.

2.0 Agricultural Land:

2.1 In Response to Deadline 1 Submissions LIR 18.18 – 18.21 the Applicant states *"During the operational phase soil quality is able to be improved from nutrient inputs as a result of grazing and reduced agricultural pressure through heavy machinery, ploughing, fertilisers, herbicides and pesticides."* Does that mean it WILL be improved? Is there a guarantee of grazing? Many clay drainage pipes will be destroyed; the land will be compacted through not being worked; there is a high likelihood of heavy metal contamination from damaged/delaminated panels; non-biodegradable cabling will be left in the ground; and ruts will form from rainwater run-off. There are many studies which suggest the land will be in a far worse state with a return to BMV quality unlikely. If the Applicant is so certain that the land will be returned to the same grade then there needs to be a guaranteed financial arrangement in place that triggers a substantial penalty clause on failure.

2.2 Response to Deadline 1 Submissions, LIR 18.18 – 18.21 explains NKDC's concern regarding the use of BMV land. The Applicant states: *".... The Applicant has sought to avoid and reduce the amount of BMV used for solar PV and other infrastructure development"*. So what is the Applicant's criteria? ES Volume 1, Chapter 4 Para 4.2.11, 'Reasonable Alternatives Considered' states: *"In determining a suitable location for the Proposed Development, the Applicant sought to develop a single new Nationally Significant Infrastructure Project (NSIP) scale solar project generating a minimum of 250 – 500 Megawatt (MW) (based on a site comprising minimum 1,000 acres)"* So, in the Applicant's own words, a project minimum footprint of 1000 acres delivering 250 – 500 MW must be commercially viable. If only non BMV land within the Order Limits were to be used it would easily sit in this category. So the Applicant **has not sought to avoid and reduce the amount of BMV used for solar PV and other infrastructure development**. Indeed, the only justification for using the BMV land appears to be profit driven.

2.3 Furthermore, in Response to Deadline 1 Submissions LIR 20.17 the Applicant states that *"there is no longer a need to consider food production in land use planning terms"*. Following the amendment in Dec 24, the National Planning Policy Framework (NPPF) Footnote 65 still 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." The Applicant was quick to ignore food security in the UK but conveniently also ignores the need to maximize use of 'poorer quality land'. By having already admitted a minimum of 1000 acres would be sufficient, the Applicant is in direct conflict with the NPPF. Indeed, the Applicant already has a number of circa 50MW solar farms so anything of that size or greater must be commercially viable. It must be noted that Lincolnshire County

Council at Issue Specific Hearing 3 (00:21:37:09) stated *“we are of the view that food production still remains a material planning consideration, having regard in the various policy statements”*; will the Applicant continue to ignore this?

3.0 Traffic & Transport:

3.1 Response to Deadline 1 Submissions LIR 21.9 states, *“the Staff Travel Plan will include enhanced measures to suppress single car occupancy levels”* What measures, and how does the Applicant intend to enforce this? Is this applicable to construction, operation and decommissioning? Does ‘Staff’ include all people attending the site including contractors or merely staff under the direct employment of the Applicant?

3.2 In Response to Deadline 1 Submissions LIR 21.9, regarding the A15/B1202 junction, the Applicant states, *“.... Staff movements through the junction will be subject to an embargo between 0700-0900hrs and 1600-1800hrs”* The Outline Construction Traffic Management Plan (OCTMP) states working hours will be 0700 – 1900 Mon to Fri. The junction is always busy; this only moves potential congestion issues earlier or later in the day, it does not eliminate them. The OCTMP gives no detail as to how the Applicant intends to implement and enforce the embargo other than in Para 8.4.2 where it states *“Any non-compliance of vehicle routing will be encouraged to be reported by local residents through a hotline number”*. Firstly, it is unacceptable that the Applicant is expecting the local population to police compliance with its routing policy. Secondly, the junction is not close to any residence so is the Applicant expecting people who can spare the time to stand by the side of the road checking vehicles? Thirdly, how is a local resident expected to know if a given vehicle is associated with the development or not? This is totally unworkable.

4.0 BESS:

4.1 In Response to Deadline 1 Submissions Table 5.1 (P 129) the Applicant responds to Ashby de la Launde & Bloxholm with Temple Bruer and Temple High Grange Parish Council and Scopwick & Kirkby Parish Councils’ concern regarding BESS spacing, *“The extract from the NFCC guidance on page 7 states “A standard minimum spacing between units of 6m is suggested unless suitable design features can be introduced to reduce that spacing. If reducing distances a clear, evidence based, case for the reduction must be shown”. The Applicant considers that this has been discharged through discussions with LFRS: full details can be found in the **Draft Statement of Common Ground – Lincolnshire Fire and Rescue Service** also see the **Outline Battery Safety Management Plan**”*

4.2 I am sure the Parish Councils will respond but to be clear there are NO FULL DETAILS in either the Statement of Common Ground (SoCG) nor the OBSMP. Indeed, the SoCG states: *“The Applicant confirms that the NFCC guidance is being used as a fundamental input to develop the design from the start.”* Clearly it is not, otherwise BESS container spacing would be 6m or the Applicant would have clearly explained the ‘suitable design features that have been introduced to reduce the spacing’. In short, there is no obvious *“clear, evidence based, case for the reduction”* of BESS container spacing.

4.3 Response to Deadline 1 Submissions Q1.9.9 (P 126) mentions the Environment Agency’s request for details of the maximum volume of firewater that could potentially be required, and how that volume could be retained? The Applicant states: *“The NFCC guidance states a minimum amount of water to have available, not a maximum. The amount of*

firefighting water to be held on site will be determined as part of detailed design.” Whilst the Applicant is happy to follow NFCC guidance where it suits this does NOT answer the Environment Agency’s question. This is nothing to do with NFCC Guidance; this is the Environment Agency attempting to assess the potential consequences of contaminated water entering the aquifer. It is ESSENTIAL the Applicant determines as a matter of urgency the MAXIMUM water that would be required in the worst case event; this is so the Environment Agency can assess the contamination risk and determine if the Applicant’s containment proposals are acceptable. The other 2 BESS currently in planning in the area have provided on-site water quantities and design parameters including containment details, why is it so difficult for this Applicant to provide such detail?

4.4 In Response to Deadline 1 Submissions P135 Table 5-2, regarding Carlton Le Moreland Parish Council’s concern about BESS safety, the Applicant states “..... *these documents [Plume Assessment & OBMSPP] clearly set out that due to the application of appropriate mitigation measures specific to this site, including testing and on-site spacing, the aggregate risk (all containers) of a cell venting event at approximately once every 7700 years for the example BESS array in the Proposed Development.*” Firstly, can we have sight of the calculation that results in 1 in 7700 years. Given that the Applicant states detail design is yet to be started, what design parameters have been included in the calculation, particularly what BESS spacing is being used? Secondly, alongside this 1 in 7700 year event, how does the Applicant explain the hundred or so BESS fires/thermal runaway events worldwide to date? The Applicant goes on to state: “*in the very low likelihood of a thermal runaway event, due to the mitigation measures, thermal runaway will not propagate from one container to the next.*” This is a bold statement. ZERO risk of propagation and the Applicant has not even selected the battery type nor finalised the design including BESS spacing. What are the ‘mitigation measures’ proposed and where are the calculations that result in zero risk of propagation from one container to the next? Clean Energy Associates in their Report dated February 2024 conclude that 26% of over 320 inspected energy storage systems had quality issues related to the fire detection suppression system. 18% of inspected systems had quality issues related to the thermal management system. These findings are not consistent with the statistic of 1 in 7700 years. **To be clear, the Applicant has failed to acknowledge and allay the absolute FEAR amongst the local population that this BESS will bring with it.**

4.5 In response to Scopwick & Kirkby Parish Council’s concern (Response to Deadline 1 Submissions Table 5.4) regarding the catastrophic consequences of firewater entering the aquifer the Applicant states: “*Proposed mitigation measures that will avoid any pollution entering the aquifer, that will be secured by the oCEMPoOEMP oDEMP..... include:*

- ...
- ..
- *Measures to manage firewater associated with the BESS.”*

The Outline Operational Environmental Plan (oOEMP) Table 6 states: “*To manage the potential impact of firewater associated with the BESS, a tanker will remove firewater from site, preventing accidental release to the surrounding environment.*” It is staggering that the Applicant has such few words for such a major issue. Indeed, this response generates even greater concern; by saying ‘**a tanker**’ the only conclusion that can be drawn is that this is the

total water that will be held on site for a fire and hence the size of the containment area. A large tanker is, say, 30000 litres; for firefighting at 1900 litres/min (NFCC Guidance) this would last about 16 minutes. NFCC guidance is for 2 hours, other services recommend greater amounts; West Yorkshire Fire & Rescue, for example, recommend double delivery (1900 litres/min x 2) for 24 hours, some 5.5 million litres. And this from an Applicant who is confident of zero risk of fire propagation and zero risk of 'pollution entering the aquifer'.

4.6 Response to Deadline 1 Submissions Table 5.1 states " *Regular contact with LFR, full details of agreements made can be round (found?) in the draft Statement of Common Ground.*" If this woefully thin document is the Applicant's example of "full details" then the FEAR surrounding BESS safety is only going to get worse. Indeed, the SoCG with LFR lists the most recent contact as being on 9 Jul 2024..... this is hardly regular contact. The SoCG further states: "The Applicant confirms that the NFCC guidance is being used as a fundamental input " IT IS NOT (no 6m separation for example) so how can this be AGREED? SoCG again, in response to "What standards are applied and what type of BESS being installed?" "The Applicant confirms NFPA 855 is being considered in the design. LFP Li-ion batteries are being proposed " "Being considered, being proposed" – how can this be AGREED? SoCG again, 'No drenching system' AGREED. The document is not signed so how have LFR actually agreed all this? This document, along with the Emergency Response Plan, is fundamental in establishing a minimal safety baseline; BOTH DOCUMENTS SHOULD BE FORMALISED AND SIGNED PRIOR TO GRANTING OF ANY DCO.

4.7 The OBSMP (Rep1 048) Para 1.1.4 states "*Prior to commencement of construction of the BESS, the Applicant would be required to prepare a Battery Safety Management Plan which must be in substantial accordance with this Outline Battery Safety Management Plan.*" Para 1.1.5 goes on to state "..... *The approved Battery Safety Management Plan may be updated prior to the Proposed Development's operation phase*" This gives the Applicant carte blanche to do what it wants without recourse to any sanity check by a competent authority. This is unacceptable.

4.8 Why cannot the Applicant just give us some definitive detail? At a similar stage, Helios Renewable Energy Project detailed the quantity of water available on site, an attenuation basin capacity of 228000 litres plus allowance for a 1 in 100 year storm and a further 30% allowance for climate change. In order to ensure no leakage the entire BESS compound will be lined with an impermeable membrane. I would urge the Planning Inspectorate to refuse permission for construction of the BESS given the lack of information provided by the Applicant.

5.0 BESS Competence:

5.1 Environmental Statement Appendix 1.1 Statement of Competence lists EIA Technical Disciplines alongside qualifications and experience of un-named individuals. A glaring omission is nobody listed with technical qualifications/experience in the discipline of BESS design and safety. What are the technical qualifications and corroborated experience of the Applicant's BESS safety consultant(s)? Given the huge fear regarding BESS safety in the local population this is extremely concerning.

6.0 Water

6.1 In response to Ashby de la Launde & Bloxholm with Temple Bruer and Temple High Grange Parish Council concerning flooding and rainwater runoff from millions of solar panels (Response to Deadline 1 Submissions Table 5.1) the Applicant states: *“Increased runoff from PV panels is negligible due to rain shadow effect.”* This does not make sense. The entire Order Limit sits on essentially flat ground; the Applicant talks of rain flowing down slope from one set of panels to another – where are all these slopes? More likely, rain will flow off the solar panels and form channels. These channels, containing concentrated amounts of water will produce flows far more significant than water coming off an open field with greater surface for absorption. The Applicant needs to clearly explain to the ExA why this does not represent a serious flood risk.

6.2 In Response to Deadline 1 Submissions Table 5.1 Table 5.4 P142 regarding potential contamination entering the aquifer, the Applicant states “.... *The potential impact on groundwater when mitigation measures are in place is considered to be low adverse and not significant.*” But the Applicant has previously used words such as **avoid**, **ensure** and **prevent** with respect to leeching of chemicals from solar PV panels and contaminated firewater. So is the risk “low adverse and not significant” or zero risk as inferred by the words ensure and prevent?

7.0 Drainage:

7.1 In response to Scopwick & Kirkby Parish Council’s concerns (Response to Deadline 1 Submissions Table 5.4) regarding damage to old clay drainage pipes, the Applicant refers to the outline Construction Environmental Management Plan. Table 8 states *“If existing land drainage systems are damaged during construction works, they will be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes to the baseline.”* Given that the exact locations of the potential thousands of these old clay pipes is unknown, how does the Applicant *“ensure no lasting changes to the baseline”*, and how will this be monitored to ensure compliance? Indeed, how will the Applicant even know if a clay pipe has been damaged or destroyed? In short, numerous clay drainage pipes are likely to be destroyed and there WILL be a ‘lasting change to the baseline’. The Applicant states that no lasting changes compared to the baseline will be **“secured”** in the oCEMP. A Management Plan does not secure anything; it is how the Management Plan is implemented that is key. The Applicant has problems with managing a 50MW solar farm (please see Section 13 below); what chance with something 16 times larger?

8.0 Waste:

8.1 Response to Deadline 1 Submissions Appendix 3 is the Applicant’s Cumulative Waste Technical Note. Table 1 shows clearly that the Region will become a dumping ground for Net Zero waste. There is no certainty that there will be companies waiting to recycle the Applicant’s waste solar equipment. Indeed, there is no certainty that the Applicant will still be responsible for decommissioning what could contribute to the UK equivalent of the US Rust Belt. In the same way the Applicant cannot guarantee the availability of companies to recycle/dispose, no one can predict what legislation will be in place in 40 years time; landfill might be prohibited. The solar PV panels might just be left to rot along with the underground cables with pollution risk to the aquifer. **In France, EDF Renewables must pay**

an eco contribution which guarantees reprocessing of solar PV panels at the end of their life; having set a precedent, why is the Applicant not making a similar provision?

9.0 Comments by Thorpe on the Hill Parish Council:

9.1 The comments in response to Thorpe on the Hill Parish Council sum up the Applicant's attitude to the opinions of local people. In Response to Deadline 1 Submissions (P150), Thorpe on the Hill Parish Council state "Footpaths through farmland will be hugely degraded once those footpaths are routed through corridors of solar panels encased by high security fences." The Applicant responds, "***The Applicant notes that Thorpe on the Hill parish is located over 13km to the north west of any above ground infrastructure associated with Springwell Solar Farm. The Proposed Development would not be visible from any location within the parish or any footpath within 10 km of the parish.***" Is the Applicant inferring that the Parish Council is not permitted to comment as it is 13km away? The Parish Council did not comment about visibility from Thorpe on the Hill village. Does the Applicant think people from the Parish are not entitled to walk along footpaths 13km from their own village? Does the Applicant think villagers from Thorpe are not entitled to comment?

9.2 Response to Deadline 1 Submissions (P151) details further comments from Thorpe on the Hill Parish Council. In response the Applicant again is disparaging; "***The Applicant again notes that Thorpe on the Hill parish is located over 13km to the north west of any above ground infrastructure associated with the Springwell Solar Farm and notes there would be no impact on any key viewpoints or on the landscape character within or surrounding the parish.***" The Parish Council did not comment about viewpoints from Thorpe on the Hill village. Like many people in Lincolnshire, the parishioners like to enjoy their entire county; to effectively intimate they are not entitled to offer their opinion is appalling.

10.0 Solar PV Panels

10.1 In response to Ashby de la Launde & Bloxholm with Temple Bruer & Temple High Grange Parish Council (Response to Deadline 1 Submissions Table 5-1) the Applicant states "*During the operational life of each solar panel, maintenance operations will ensure that no chemical or heavy metals will be released from within the panels.*" How does the Applicant intend to **ensure** this is the case? How often will the panels be inspected? **Ensure** is a word that means 100% certainty of no contamination from chemicals or heavy metals leeching into the aquifer. In response to Scopwick and Kirkby Parish Council the Applicant goes on to say, "*With faulty, damaged or end-of-life assets, a key method to reduce the risk of chemical impacts is to ensure they are removed and disposed of responsibly. Should there be any unexpected contamination,*". So we now go from zero risk to reduced risk; WHAT IS THE ACTUAL **RISK** OF CONTAMINATION ENTERING THE AQUIFER? Indeed, where are the calculations quantifying the risk? Also, the Applicant states a 40 year life but now refers to end-of-life assets so clearly accepts solar PV panels will reach their end-of-life prior to 40 years.

10.2 If damaged, how soon will a panel be removed and where will damaged panels be stored prior to final safe disposal? What weather will the installation be designed to withstand? Given the Applicant's assurance by using the word **ensure** and given the rapidly changing climate and the increased frequency of '1 in 100' year storms, an even greater margin of safety would not be inappropriate. Porth Wren Solar Farm on Anglesey, owned by EDF, sustained significant damage during storm Darragh in December 2024. "Hundreds of

solar panels were ripped from their mountings, some shredded, by the storm's high winds." If a similar event, with high wind and torrential rain, occurred with Springwell Solar Farm it would be a disaster for the aquifer. How will the Applicant demonstrate a 100% assurance that contamination will not enter the aquifer at any point across the 40 year life of the Proposed Development?

11.0 Climate:

11.1 In Response to Deadline 1 Submissions LIR 15.22 regarding NKDC's recommendation for ongoing monitoring of climate change targets, the Applicant refuses: *"It is not industry standard practice to monitor emissions from schemes such as this."* This Proposed Development dwarfs any other solar farm operational or proposed for the UK so there are **NO SCHEMES SUCH AS THIS**. The only conclusion that can be drawn is that the Applicant does not consider the emission target will be achieved.

11.2 Appendix 2 to Response to Deadline 1 Submissions is a Climate Technical Note in which the Applicant states that the results and conclusions of EWS Volume 1, Chapter 8: Climate remain extant. Para 1.1.5 states *"The author stands by the comparison to CCGT as the most appropriate to assess the GHG savings of the Proposed Development ..."* For the **Author** is it reasonable to assume the **Applicant** stands by the comparison also?

11.3 The Applicant claims *"savings of 9.6 million tCO₂e across its lifetime when compared against fossil fuel energy."* Notwithstanding the Secretary of State has stated a Combined Cycle Gas Turbine an **inappropriate** baseline for comparisons, the Applicant continues to pursue this line.

11.4 I have separately submitted my argument regarding the Applicant's emission calculation (comments in response to ISH3, Climate, 16 July 2025 – Submission No. 37111). I will not repeat my argument but in summary, by not using an inappropriate baseline for comparison the savings claim immediately reduces from 9.6 to 2.4 million tCO₂e. Solar is the most polluting of the renewables according to the American National Renewable Laboratory; therefore, comparison against other renewables across the majority of the lifetime of the Proposed Development when fossil fuel energy will not be available, shows Springwell to be more polluting. A Small Modular (nuclear) Reactor, for example, has zero operational emissions, and reported lifetime emissions intensity of **12 gCO₂e/kWh** (compared to 84.1 for Springwell).

11.5 The other issue regarding the proposed development is component replacement. The Applicant assumes the solar PV panels will all last the life of the development (40 years) other than a 5% attrition rate for damage etc. However most manufacturers suggest a life of 25 to 30 years. The US Environmental Protection Agency in May 2025 stated that typically solar PV panels will last 25 years or more; if it was anything remotely close to 40 years they would not state 25. Therefore, most likely a replacement of every solar PV panel at least once will be required adding over a further one million tCO₂e to the GHG emissions. Indeed, the Applicant regularly uses phrases such as *"It is not industry standard practice to ..."* to be clear **it is not industry standard practice to life solar PV panels at 40 years**. Moreover, the Applicant has assumed the life of BESS batteries at 17.5 years and transformers at 40 years. The 2 BESS currently in the planning stage with NKDC, are planning on battery replacement at 10 years and transformer replacements at 25 years. The Applicant appears to have

significantly underestimated the carbon emissions attributed to component replacement in order to make the GHG saving calculation look more favorable.

11.6 With all this taken into account the result for the proposed development is a negligible saving in GHG emissions at best yet still more polluting than alternatives such as nuclear or wind. Given such an erroneous GHG emissions savings claim by the Applicant, NKDC's recommendation for ongoing monitoring of climate change targets (Response to Deadline 1 Submissions LIR 15.22) should be made a condition in the draft DCO.

12.0 Not Meeting the Government Target:

12.1 The UK Government's 2030 target (Clean Power Action Plan) states "..... the 2030 power system will see clean sources produce as much power as Great Britain consumes in total over the whole year, and at least 95% of Great Britain's generation; reducing the carbon intensity of our generation from 171gCO₂e/KWh [grams of carbon dioxide equivalent per kilowatt hour] in 2023 to well below 50gCO₂e/KWh in 2030". Response to Deadline 1 Submissions Appendix 2, Table 2 quotes the lifetime intensity of the Proposed Development at 84.1 gCO₂e/kWh. **Therefore for it's entire life, the Proposed Development will be producing 31 gCO₂e/kWh above the Government's 2030 target** requiring other much cleaner renewables such as wind and nuclear to redress the balance.

12.2 The Applicant's "Statement of Need" states, "*..the decarbonization, security of supply and affordability benefits delivered by the Proposed Development to the national urgent need for low-carbon generation, should be accorded very significant when assessing the planning balance.*" This Proposed Development will slow down decarbonization of the grid as it will continually be well above the Government's 2030 target. Security of supply will be in the hands of the Chinese Government. What affordability benefits will be delivered, certainly not cheaper energy bills?

13.0 And Finally:

13.1 Tye Lane Solar Farm, in Suffolk, generates 49.9MW and covers 65 hectares; it is owned and operated by EDF Renewables. The minutes of the Tye Lane Solar Farm Community Liaison Group are available on the EDF Website. Minutes of the meeting dated 23 April 2024 states, "*The group remind MC that currently the project has felt like a catalogue of mistakes one after the other with one thing being said and another done.*" The Applicant, on many occasions uses the phrase "*this will be secured by the Management Plan*". If the Applicant cannot adequately manage a 49.9MW facility there is absolutely no confidence whatsoever that the Applicant can manage one 16 times the output on a footprint 20 times larger and no confidence that **anything** will be 'secured'.