

Deadline 5 Submission from Springwell Solar Action Group

20052314

As an action group we have tried throughout this process to provide the detail from local knowledge on how the monstrous Springwell development and subsequent developments will destroy this beautiful part of Lincolnshire. Planning consent can surely not be granted purely because its cheap and convenient.

From the very start of this process, it has been abundantly clear to our communities that the Applicant and its representatives felt that this was simply a rubberstamping exercise. Throughout the process local concerns have been ignored.

If we examine the responses to the various submission deadlines has the applicant substantially change anything? NO. They have simply finessed language and avoided giving clear and substantive answers

Here are a few examples where there has been zero clarity

- Visual Impact
- Agricultural land
- BESS Safety
- Waste
- Climate

Landscape & visual Impact

The applicant has commissioned works from supportive companies (RSK) to produce very bias views. They have simply ignored the overwhelming concerns of the community, the District, County Council, MP & Lincolnshire Mayor. When it comes to understanding the impact, the community are far better placed than the Applicant to assess the impact of the Proposed Development given their knowledge of the area.

The applicant has been totally dishonest when it comes to highlighting the impact on the landscape. How are they able to create photo montages of solar panels hidden by rapid growing hedges but are unable to create photo montages of huge substations and massive BESS sites on the A15 opposite Toll Bar Equestrian Centre. They are simple taking the community for idiots.

The comment by the applicant's legal team that there would be an increase in tourism with people wanting to come and visit this decimated area is a disgrace. Can they produce any evidence to show where there has been an increase in tourism where a landscape has been totally changed by an industrial development? NO, they can't

We are blessed to have local knowledge of this landscape with people who farm and manage the landscape. The applicants claims that the planting of new hedgerows will diminish the impact of this development are laughable. It will take close on 15 years to get

the growth required to hide a percentage of this development, it will be impossible to hide the Substation or BESS site. These will be a blot on the landscape for 40 years.

The applicant is not providing any guarantees that planting will reach 3metres within 10 years and there are no penalties in place if they fail. We would also highlight the total inconsistency in the applicant's documentation. They state the hoardings on the A15 will be removed after approximately 3 years following the construction phase. On one hand the Applicant states mitigation planting will reach 3m in year 10 and then, for the temporary hoarding location, states 3m will be achieved in year 3. The applicant can't play fast and loose with fact. Are hedgerows and planting going to be 3m high after 3 years or 10 years and can they provide a clear planting list and guarantee that the planting will be in keeping with existing vegetation.

It is also critical to once again highlight the proposed hoarding to block out glint that the applicant has always stated would not exist. Clearly it will! This section of the A15 will look terrible and will be a magnet for graffiti!

Toll Bar Equestrian Centre, and the Windmill and Scopwick Mill are just 2 properties that are going to be blighted by this development. This was highlighted on several occasions during the PI site inspection. There is no justification for good hard-working people who have always done the right thing to have their properties and livelihoods blighted in this way.

Agricultural Land:

The Applicant clearly does not recognize the importance of protecting agricultural land. If they did the Applicant would confine its Proposed Development to non-BMV land and also source brownfield locations.

Powering Up Britain: Energy Security Plan states that government seeks large scale ground-mounted solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land." If BMV land were to be excluded from any development, Springwell would still be one of the largest solar projects in the country. This matter has been raised on several occasions by many interested parties. The only conclusion that can be made is the applicant failure to clearly explain why this Proposed Development cannot proceed on non-BMV land is that there is no explanation other than a financial one. Again, we would call on the Planning Inspector to refuse the use of this land just because it is cheap and easy to secure.

The Applicant states "Out of the 1280ha of land within the Order Limits, 231.7ha is BMV which is proposed to be utilized for hard infrastructure i.e. collector compounds, Springwell Substation, Solar PV development, and BESS." This statement does not justify use of the BMV land: without the solar PV panels on BMV land the Proposed Development would still be one of the largest UK solar developments to date; Springwell Substation and the BESS do not need to be close to the Proposed Navenby Substation, they can be on the closest non-BMV land within the Order Limits. Indeed, the argument that the Springwell Substation and BESS do not need to be close to the Proposed Navenby Substation is supported by the Proposed Fosse Green Substation and BESS which will be some 10km from the Proposed Navenby Substation.

As we have learned from experts who have worked this land this whole area is BMV. Experts with over 30 years on this land rather than graduates with zero experience. The applicant once again has tried to manipulate the process.

The applicant continually tries to state this will be a temporary development. We can all use semantics, but under any reasonable definition 40 years is a lifetime. As is being shown and highlighted by Paul Frost in Deadline 4 there is growing evidence that these solar developments are having an impact of the soil and biodiversity in a negative way. The applicant again has zero ability to state the land will be returned to its predevelopment condition. If they can guarantee this, are they prepared to provide a sample of the soil with its substructures and nutrient values for safe keeping and to issue a guaranteed bond to pay for any remediation work required in 40 years? As they have claimed the land will be the same in 40 years, they should be confident in providing a bond as they know they won't lose any money.

Our community has highlighted on numerous occasions the concern with regards drainage and especially the undersoil clay pipes in the fields above the village of Scopwick. There are no accurate drawings for these pipes, but they exist. We accept where there are open channels and a pipe is broken it will be fixed (provided there is an independent site foreman monitoring the works) however as highlighted by those who know the land, heavy percussion above ground is very likely to break or disturb these clay pipes. As they are buried no one will know if they have been damaged. The first time we know of damage will be the flooding of Scopwick village. Will the applicant bare the cost of all flood damage in the village? This certainly should be a requirement of the DCO.

We also highlight again the sequential test. On all parameters the applicant has failed this test. In our previous submission we highlighted that there is clearly significantly less viable land within the Blankney Estate however it is closer to valuable assets such as Blankney Village or Directors homes as a result it has been removed to not impact assets.

BESS Safety

The applicant is using every possible method to avoid a clear and precise plan for the BESS. It is simply not good enough to expect this community to sit and wait to see what appears on our doorstep. The so-called expert that has been wheeled out on several occasions is not independent. There is zero independent oversight. We have named some external reputable individuals who have clearly stated there are real risks associated with BESS facilities. These are unregulated facilities, and the risk lies with the local community and the first responders. Once again, the applicant states nonsense such as 1 in 7700 years probability of a cell venting event. This seems to be an error in calculation or a blatant piece of dishonesty. How can the 3 BESS fires in recent years in the UK be explained away?

The applicant is also proposing to provide the minimum quantity of water on site. Other applications have given much more detail and have also been required by inspectors to undertake significantly more remediation work. Look at the Fosse Green Proposed Development, at a much earlier stage in the planning process, they are giving much more detail regarding water on-site for firefighting purposes, attenuation basin capacity and

measures to prevent contamination of the watercourse. Helios Renewable Energy Project likewise. Why can't the applicant provide similar detail?

Waste & Decommissioning:

If we are led to believe this site will operate for 40 years and will then be returned to the same state it was in in 2025 then we must assume a considerable amount of work will be required and considerable cost, very likely several hundred million. As we have highlighted on many occasions it is very unlikely that EDF will maintain the ownership of this development unless they use the CPO process to acquire the land as they see more value in a brownfield site in the future as they could then look for planning consent for change of use. However, let's assume as we see so often EDF will ensure they maximize profits in the first 10-15 years then they will sell the site on. As we have seen in so many disposals the site gets acquired and sold several times until it becomes a liability at which point the site gets locked up and the owners cease trading. Who is then responsible for decommissioning. The DCO will be a worthless document with no legally binding elements. If the company ceases to trade with no assets, then there is zero action that can be taken. The applicant's legal team cannot dispute this.

It has also been highlighted and acknowledged that there are currently no facilities in the UK that can recycle this waste. EDF simply state market forces will drive this. This is a significant burden they are placing on NKDC and LCC to manage the waste.

Furthermore, the applicant is making totally unreasonable claims of 40-year lifespan of panels etc. It is commonly accepted at other developments that BESS life expectancy is approx. 10 years and panels 15-20 years. This means significantly more waste than what the applicant is projecting. We note their reluctance to accept a 5% replacement level in the DCO. Again, this is evidence that the applicant is taking everyone including the Planning team for fools.

Climate Emissions

A nuclear Small Modular Reactor (SMR)), for example, will sit on 2ha of land and power one million homes (The Times 22 Aug 2025) compared to 180,000 homes for this Proposed Development. A similar comparison can be made regarding cost of power: at approximately £2Bn to power one million homes, an SMR will power 100,000 homes for circa £200M; even at the lower end of the Applicant's projected cost of £650M, the proposed development will power 100,000 homes for circa £360M.

We have constantly been educated and on occasion been labelled flat earthers by the applicants legal team and representatives. We are told this development needs to happen to avoid the climate catastrophe.

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 34.1 gCO₂e/kWh above the Government's 2030 target requiring other much cleaner renewables such as wind and nuclear to redress the balance. Can the Applicant please explain how the Proposed Development can contribute towards the Government's target.

To conclude our community does not want this development, there is no need for this development and we kindly request that the Planning Inspectorate does the right thing and listen to our inputs. This application should be declined on so many levels. Money & greed should not trump local peoples wishes.