

Submitted by: Barry Smith (Interested Party Ref: ██████████ )

Deadline: Examination Deadline 2 – 6 Feb 26

Reference: The Applicants Response to Relevant Representations – Document REP1-047.

I have read REP1-047 and wish to challenge two of the many assertions made within the document. I have the following comments (page numbers refer to pages in REP1-0470).

Knock on Impact on Decarbonisation (page 248) I welcome the applicant's acceptance that the proposal would displace existing non-food crops on site. I also note the applicant's view that the proposed use of the same area of land would contribute more to decarbonisation than current energy generation use so that there would still be a net benefit but I think the applicant overstates the net benefit. I do not accept that greater use of EVs will eliminate the need for biofuels into the foreseeable future. Heavy Duty Diesel powered vehicles and particularly machines with high duty cycles such as long-haul trucks, construction vehicles and intensive agricultural machinery are expected to be either hybrids or use electrical power from fossil fuelled generators well into the future. Batteries cannot replicate the energy density of liquid fuels without incurring a significant weight (size), cost and range disadvantage. By not recognising the displacement effect, the applicant overstates the benefits and the Environmental Statement should be revised to recognise that some of the land used for non-food crops is likely to need replacement.

Socio-Economic Assessment Methodology (page 270) I wish to highlight an important tangible omission in the Applicant's approach, namely the Scunthorpe Steel works and associated cluster of firms that are major employers within the applicant's 60-minute travel area. The applicant refers to several aspects of government policy on the green transition but not the policy to re-orientate towards manufacturing for the green economy. There is no indication given by the applicant of engagement on steel production with the Greater Lincolnshire Combined Authority which has the statutory responsibility for economic development and has prioritised saving steel production in the UK. The applicant has identified benefits from the scheme (such as the community fund and new paths through the site to help support the visitor economy). However, the applicant is silent on the one measure that would provide the most significant socio-economic benefit to Lincolnshire, namely a purchasing policy to retain Scunthorpe as a producer of steel. The applicant has not indicated the tonnage of steel in the project but, if all of it was British-poured steel (from blast or electric arc furnaces), it would have a significant economic impact. The applicant dismisses the issue by saying "it is not possible to identify suppliers with certainty for products such as steel, due to the construction start date being some years hence". While suppliers may not have been identified, it would be possible at this stage, as a minimum, to commit to signing the UK Steel Charter demonstrating a commitment to use procurement to purchase UK-made steel. Construction starting "some years hence" does not preclude action in advance of NSIP examination - as evidenced by the Heathrow expansion programme. In a similar vein, a procurement commitment to the purchase of both the solar panels and the enabling electrical

infrastructure (cabling, inverters etc) from UK suppliers by the applicant would bring significant benefit to the UK economy from the large-scale production and manufacturing of these products and needs to be mandated. Ministerial statements emphasise the importance of UK industry being supported in the delivery of clean energy supply chains and have been matched by the announcement by Great British Energy of a programme to secure long-term economic growth for the UK in this domain. The £1 Bn Energy Engineered in the UK programme announced on 11 December 2025 forms part of the 10-year plan within the government's published Industrial Strategy to boost investment, create good skilled jobs and unlock private investment for large-scale green energy manufacturing projects such as FGE. £700M of funding will be announced in the summer of 2026 to support the development of the industrial ecosystems required to deliver these UK supply chains. A commitment to the use of these nascent UK supply chains needs to form part of the conditions for the DCO. The oft repeated statement by the applicant of not making any procurement decisions until several years hence needs to be balanced by the requirement to adopt a UK supply chain for all of the different elements within the design of the development as seen with other NSIP projects.