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I wish to speak on a number of issues some of which I have raised before but have not had a substantive response. The areas I would like to cover are: output efficiency, overplanting, permanent sealing of land, funding for decommissioning and a final statement regarding BESS safety.

This proposed development is based on a false claim of exaggerated energy production. Before I go any further I will briefly explain what is meant by 'load factor' for anyone not familiar with this term; it is the ratio of actual, or in this case, predicted output as a percentage of the maximum theoretical output if the plant operated at full capacity 24 hours per day, 365 days per year. In short it is the efficiency of the energy production. Perfect would be 100%, a small modular nuclear reactor is about 95%, solar is currently, based on Government data, below 10%. Yet the Applicant's data (REP2-033, Table 8.1) is predicting the load factor to be significantly higher, ranging between 15 and 20%; how is this justified? Moreover, the Applicant's predicted total generation figure of about 19.5 Million MWh across 60 years is based on an unsubstantiated load factor of 15.4%. If 10%, a far more realistic figure, were to be applied, the output would be about 12.6 Million MWh; this would result in a carbon intensity figure across 60 years of 57 gCO₂e/kWh. This is way above the Government's 2030 planned maximum target of 50.

The applicant has tried to justify an overplanting ratio of 1.6 for the solar panels. Yet the Applicant has now produced a Table showing that, for Nominal Operating Cell Temperature (NOCT) conditions, conditions which the applicant states are best suited to the UK, an overplanting ratio of 1.17 is sufficient. Rounding this figure to 1.2 results in a reduction of some 139,000 panels for the fixed south facing option. (Note: REP2-033, Table 5.2 starts at Year 1 with an effective overplanting ratio of 1.56 and ends at 1.37 in Year 30 for Standard Test Conditions (STC) and 1.17, ending in 1.02 for NOCT conditions. The Applicant at ISH3 appeared to suggest that starting at 1.56 ends in Year 30 at 1.02; this is not consistent with Table 5.2 so a clear explanation is required).

It is noted that the ExA has asked at Ex Q2 for examples where other solar NSIPs have treated land underneath BESS, substation etc as permanently sealed. Some IPs have submitted details of NSIPs where the Secretary of State determined that such areas were considered permanent. Indeed, the applicant states that, apart from the planned orchard, no land will be permanently sealed. Yet the same applicant, in promoting Mallard Pass, stated (Paragraph

12.4.16, Chapter 12 of the Mallard Pass ES, Land Use and Soils (APP-042)), that the areas of the substation, access tracks and solar stations on the site will be treated as **permanently sealed over**. (paragraph 12.4.45 and Table 12-5 refers). On what basis is the applicant treating this proposed development differently?

The applicant initially stated ALL aspects of the proposed development were covered in the Funding Statement (APP-021 Paragraph 1.3.1). Then admitted decommissioning was NOT covered (REP1-047 Page 352). Then the Applicant updated the Funding Statement (REP2-010, Sections 1.3 & 1.4) to include the word 'decommissioning' WITHOUT any uplift in the total £340M figure. What is the explanation for this? Equally importantly, the applicant has previously stated "***The Applicant is committed to setting aside money for decommissioning the Proposed Development.***" (APP-037, Page 12-17). That statement refers to the Applicant, not any subsequent developer or undertaker. Where is the evidence of this commitment? If sadly, this proposed development is approved, the applicant is responsible, the very least the applicant should do is take the responsibility for cleaning up the mess. An adequate funding mechanism should be secured through the DCO.

Finally, the applicant states that 2 BESS fires in the UK to date would not have occurred if the principles and commitments in the Framework Battery Management Safety Plan had been applied. These words imply 100% safety for the proposed BESS. Not even the nuclear industry makes such claims.