

Solar site selection process

To S Martin [REDACTED]

The Appellant's site selection details as set out in its application are scant and woefully insufficient given that the site is 95% best and most versatile land, greenbelt and potentially increases flood risk.

The usual criteria for a site is as level as possible and close to a substation, as is acknowledged by the Appellant in its planning application, and which is generally accepted as 3-5km from a substation for a 33Kv cable to reduce transmission losses. However this site far from level and is 10km from the substation. In this regard the inspectors attention is drawn to the Fact Sheet issued by Solar Energy UK (a trade body) dated June 2024 and titled "Site Selection". The following paragraphs state:-

"1.1 Site Selection is critically important".

"1.5 Land is then identified within a suitable distance of the POC generally aiming to keep the development nearby to minimise the length of the required grid connection works and associated environmental disruption. This means that the site selection process is limited to a given radius, which ideally is under 2km for 132kv and 5km for 33kv"

As I have already mentioned the appeal site is 10km from the POC. The environmental disruption for a 10km cable route is likely to be significant. The Appellant has confirmed it does not have an agreed route for the cable. There is no guarantee a cable will ever connect the solar farm to the grid.

No detail is given of any other locations the Appellant investigated or reasons for rejection. Taking a radius of 10km from the substation gives an area of 314.2 square kilometres within which to search. Was the Appellant offered a site and has then tried to make a case to fit? Consequently, given the lack of evidence of a robust site selection process, there are no very special circumstances to justify use of the Fillongley site. In a comment to Sharon Edwards, BBC political reporter Lincolnshire (28 January 2025), the Department for Energy Security and Net Zero said "the policy was to encourage the use of alternatives to farmland. Anyone wanting to build solar farms on agricultural land should be able to show it is necessary and that poorer quality land was first considered". The Appellant has clearly failed to comply with government policy as it has failed to show it considered any other land or, indeed, poorer quality land and as a consequence cannot show this site is necessary.

Furthermore Ofgem has stated that the number of applications for connections is for over ten times the capacity needed.

The Appellant refers to it being difficult to find non-BMV land within North Warwickshire Borough. This is precisely the reason it should have investigated sites within the four adjoining council areas lying within the 314.2 sq km area. In the library of documents under third party representations is a document prepared by the BRE. It recommends exactly this approach.

As the site is undulating and, as the Appellant confirmed at a site meeting, the panel arrays will run parallel to the slopes. Consequently the arrays will not just face south, as stated by the Applicant, the arrays will also face east or west dependent upon which side of the slope they lie. A further consequence of this is that glint and glare is likely to be over a greater area than suggested. Indeed the glint and glare report by PagerPower confirms it's report is based on south facing panels; not on ones also facing east or west. Therefore it's report is potentially flawed and consultation responses based on the report cannot be relied upon.

The application is for a site with an output capacity of 47.7Mw. However the Appellant has confirmed the combined maximum capacity of the inverters will be 40.5Mw. This is a reduction in output of circa 16.%. Furthermore the long cable route to the substation will result in transmission losses further reducing output. The installation will therefore be less efficient and power less homes than suggested by the Appellant in its planning application. Consequently the proposed installation is not in accordance with the planning application and is inefficient

This appeal should be dismissed.