

I would like to further submit the following point as evidence to highlight critical deficiencies in the applicant's Environmental Statement and Statement of Need, which I ask the Examining Authority to consider:

1. Inadequacies in the applicant's carbon assessment

The applicant's carbon assessment relies on the assumption that converting Bedfordshire's Best and Most Versatile arable land to a solar array will create "semi natural grassland" with increased Soil Organic Carbon (SOC) assumption since it does not appear to be supported by empirical evidence from field studies show that ground mounted solar arrays create a distinct microclimate. This is characterised by shading, altered rainfall patterns, reduced vegetation productivity and increased soil compaction, leading to measurable SOC reductions beneath panels (Carvalho et al., Environmental Research Letters, 2025). These outcomes directly contradict the applicant's modelling, which treats the site as if it were undisturbed grassland rather than a structurally altered industrial surface. On high quality Bedfordshire loams, which begin with high carbon and moisture regimes, such microclimatic disruption is likely to suppress carbon sequestration rather than enhance it. As a result, the applicant's conclusion of a net carbon benefit is based on an inappropriate carbon balance of the scheme remains uncertain and potentially negative.

Additionally, with respect to the applicant's own Funding Statement (EN010141/DR/4.2):

2. Inadequate Community Legacy Fund

The applicant's own Funding Statement (EN010141/DR/4.2) confirms a build cost of £370 million. However, the proposed community legacy fund amounts to less than 2% of this total. When compared to the massive financial scale of this development and the substantial profits the developer will extract over the next 40 years, this offer is trivial and demonstrates little to no interest in the local communities. We are being asked to endure decades of industrial blight, visual harm, and heavy construction traffic so a private company can generate huge revenues, and Energy Generation of approximately 10% their advertised amount.

I respectfully request that the Examining Authority make careful consideration of each of these points.