

I object to this planning application for a huge industrial solar plant and BESS battery storage facility ('BESS') (together 'the Scheme').

In my opinion, the Scheme should be refused because:

1. It contravenes planning policies EN-1 and EN-3, The National Planning Policy Framework (including agricultural land protection), various other planning legislation and Regulations, our Local Planning Policies and caselaw, in multiple respects.
2. It does not meet the relevant and required criteria for necessity.
3. It is not a low carbon generation infrastructure. The applicant's ('Brockwell') calculations for CO2 emissions are inadequate and incomplete.
4. A duration of an initial 40 years is not temporary.
5. The consultation was inadequate and unfair.
6. The quality of the application is poor.
7. The assessment of the effects of the Scheme on ecology and biodiversity and the Environmental Impact Assessment are inadequate.
8. I believe the Scheme was designed as an investment strategy, between one of the founder directors of RNA Energy Ltd ('RNA'), bought by Brockwell, and one of the key farmers who put land forward for the Scheme. The explanation about the use of Best and Most Versatile ('BMV') land given by Brockwell at Issue Specific Hearing 2 (ISH2) was an attempt at ex post facto justification for the site selection. Brockwell did not select the site. I understand that there were unconsidered, better parcels of land in the Scheme's vicinity, which would have been more suitable and closer to the Eaton Socon sub-station ('ESSS'). **Please ensure that Brockwell supplies an accurate, chronological summary explaining how and why the site was chosen by RNA and then endorsed by Brockwell, including evidence of all relevant correspondence.**
9. Contrary to Brockwell's statement at ISH2, there are no reasonably justifiable technical requirements for the Scheme to be sited 15 km from ESSS – it would simply be cheaper. Other solar NSIP Schemes are proposed to be sited further away from their potential grid connection. **Please ensure that Brockwell supplies all its and RNA's deliberations and correspondence in connection with the selection of the potential connection to ESSS, including why all alternatives were omitted. Note that the connection to ESSS is not secure and a third party, Eaton Socon Power Limited, has objected to Brockwell using its land to cable to ESSS (Representation 100020199).**

10. Solar panels provide 9.5-11% of stated capacity in the UK climate, irrespective of scheme design, dropping to 2-3% during the Winter - further degraded by transportation. Solar panels are optimal on rooftops (with direct feed to all consumers), brownfield sites and transport corridors. The World Bank states the UK is 229 of 230 worst countries for solar resource potential. Energy security and seasonal intermittency is further affected by expensive curtailment payments during the Summer and reliance on BESS, creating market distortions with impact on costs to consumers.
11. Developers of solar schemes target agricultural land as it is cheaper to develop (open, relatively flat and easy to pile) and they require massive scale to make schemes financially viable. Recent evidence by [REDACTED] shows that none of these schemes may be financially viable without BESS.
12. BESS provides short term energy storage (electricity cannot be stored for long) but lucrative energy arbitrage, as low-cost grid imported electricity (including gas generated) is resold at times of high demand and price. BESS is insufficiently regulated in the UK. Over time, the Scheme is highly likely to have issues with thermal runaway, toxic fumes and particulates being released, requiring evacuation zones. Water used to cool BESS is also likely to become toxic and may drain into local water courses and the local drinking water system. **What experience, training or preparedness (including practical resources and finances) does Cambridgeshire Fire and Rescue have for such eventualities? BESS should be fully specifically investigated at an Issue Specific Hearing.**
13. The clustering of established local solar schemes, this Scheme and other potential schemes in the area would result in significant loss of agricultural land, including BMV - likely on a permanent basis, resulting in legitimate food security concerns.
14. The Scheme would result in the significant loss of local amenity, both visual and practical, including a major impact on Public Rights of Way, in a rural area.
15. The archaeological site excavations across the Scheme are inadequate. Roman and pre-Roman settlements and finds significantly predate the Scheme, including at Rushey Farm and two bowl barrows east of Old Manor Farm, in the Great Staughton area. The 'Small Roman Town' in Great Staughton (now a Scheduled Monument) ('SRT') is probably unique in that there surprisingly few SRTs in England and this SRT, its setting within the landscape and its network of road connections to other local Roman towns (Godmanchester, Sandy, towards Alconbury (from Dorchester on Thames) and the Nene valley (Thrapston, Irchester), has not been built over. Historic England has expressed concerns about the Scheme.
16. **This Scheme may not be viable. It would require Scheduled Monument Consent to dig connections from the solar infrastructure to the BESS under/on Site C (and then to ESSS), which is unacceptable.** On 27th March

2025 in Great Staughton School, [REDACTED] of AOC Archaeology Group, which did the excavations, said this SRT was the most exciting find of his career, 'people jumped out of their seats when they were shown it' and that the modern plough soil is just 0.3m above the surface of the remains, but shallower on inclines. The Scheme could harm the remains.

17. The local road network is totally unsuitable for the Scheme, given the many transport movements of HGVs, workers and specialist very heavy loads (both during any build phase and the multiple replacement phases for the panels, panel infrastructure and BESS over the intended lifetime of the Scheme. Brockwell has failed to adequately identify or calculate these, or the relevant carbon emissions, in its application. The B645 is a treacherous road, with bends, flooding and surface water pooling (particularly dangerous in the dark to the unaware). Numerous fatal and other accidents occur, including around 'Piggs' Hill', the sharp bend near Great Staughton/Hail Weston. This Scheme would no doubt cause an accident blackspot, with additional loss of life, injury and subsequent litigation. There is no room for two HGVs to pass each other. The B660 is similarly unsuitable, being small local road. No Scheme traffic could pass through Catworth or Kimbolton (narrow roads, a very sharp bend unsuitable for car transporters and significant number of Listed buildings which could be damaged). The intended use of the junction at the B645/A1 is predicted to fail – unsuitable tight turning and queuing highly likely. The Scheme must not be permitted to use The Highway, The Causeway and/or The Town in Great Staughton at all, including for any building of internal roads for the Scheme (as stated by the Applicant at ISH2). Grade I (St Andrew's Church) and Grade II (Place House) listed Heritage Assets are virtually on the roadside in Great Staughton and the two bridges over the River Kym, entering and exiting the village, would no doubt be damaged by any inappropriate weight and repeated use. Construction traffic at Cleve Hill solar NSIP scheme caused structural damage to buildings, roads, utilities and verges. Any potential damage would have to be remediated at Brockwell's expense/any subsequent developer/owner(s) of the Scheme. Local traffic would have to be controlled, including during commuting times and around school hours, so 'Golden Hours' would have to be written into any DCO, prohibiting construction and other traffic (including but not limited to deliveries) related to the Scheme during those times.
18. This area floods, sometimes extensively and impassibly, including around the bridges in Great Staughton, but in other local villages included in the intended Scheme as well. The likely effect of any piling, soil compaction and the concreting in of infrastructure, by the Scheme, would cause further run off water from the fields, into the River Kym and then on to the road network.
19. There are flightpaths over the Scheme used by the RAF, MOD, USAF, IWM Duxford and Shuttleworth for operations and low-level flying. The 'Luton stack' is also

relevant and Luton airport is to be expanded. All these organisations must be consulted about the effect of glint and glare, on radar and thermal venting. Brockwell has failed to consider the effect of the Scheme upwards into airspace. Reflective surfaces from the solar panels and infrastructure may disrupt aviation safety.

20. The draft DCO is fundamentally flawed. It is insufficiently detailed to protect those potentially affected by the Scheme from the day to day affects of the Scheme, as set out above.
21. The only reasonable conclusion is that the Scheme cannot be approved. In summary, it is the wrong scheme in the wrong location.