

I am submitting this Written Representation for Deadline 2, building on my previous concerns about this project and in response to the Applicant's Responses to Relevant Representations (EN010141-000542-8.9).

1. Financial Viability and the Risk of Abandonment; Inadequate Decommissioning Security

The applicant has done nothing to alleviate my concerns on this matter. The corporate structure of this scheme presents a severe financial risk to the local community and local authorities through the build phase, the 40-year life span, and subsequent decommissioning.

- **The Corporate Shield:** The legal "Applicant" for the scheme is an asset-light Special Purpose Vehicle (SPV) named BSSL Cambsbed 1 Ltd. This SPV has no substantial balance sheet or trading history capable of independently underwriting the massive liabilities associated with a construction failure, land compensation, or end-of-life restoration.
- **No Parent Company Guarantee:** The Funding Statement submitted by the applicant currently provides no binding "parent company guarantee". Therefore, the multi-billion-dollar parent companies appear legally insulated from the project's failure.
- **The Reality of Abandonment Risk:** The ultimate financial backers may be a distressed-debt hedge fund driven strictly by Internal Rate of Return (IRR). Should grid connection economics deteriorate or construction costs inflate and make the project unprofitable, the parent investors can legally cut funding. The SPV would collapse into insolvency, leaving the local community and local councils as unsecured creditors bearing the physical and financial costs of a half-built site. The Draft Development Consent Order (DCO) currently lacks a requirement for a secured decommissioning bond or escrow account. Without a legally binding, ring-fenced financial bond in place prior to construction, the local authorities have no mechanism to enforce restoration if the SPV becomes insolvent. Other NSIPs have been required to provide commercial bonds.

As an absolute minimum, should this project go ahead, the Development Consent Order (DCO) should mandate a financial security mechanism be fully established and approved before any "displacement of ground" begins. This should be fully funded (accounting for a 40-year life span including funds for long-term site clean-up and decommissioning) and be independently held. It should be mandatory and for the benefit of the communities affected. An unsecured guarantee from an overseas parent company is unacceptable due to the extreme legal complexities, costs, and risks of cross-border enforcement.

2. Inadequate Community Legacy Fund

In section 2.18.5, the applicant suggests increasing the legacy fund to £6.4 million. This is trivial. It amounts to £160,000 per year over the lifetime of the solar farm. The applicant's own Funding Statement (EN010141/DR/4.2) confirms a build cost of £370 million, which they are clearly prepared to try and fund, but support for the community is trivial. This speaks volumes in terms of their support/concern for the affected communities. Surely this voluntary fund cannot be used by the Examining Authority in the planning balance to offset or justify the severe, long-term socio-economic harms to the rural agricultural economy, loss of farming jobs, or the industrialisation of the landscape.

3. Impact on Residential House Prices

In sections 2.5.3 to 2.5.5, the applicant recognises the concerns that house prices (or the ability to sell homes) may be affected. They also highlight that "the Scheme does not require the compulsory purchase of residential properties, and compensation is therefore not available in the manner suggested." This may be the case, but this does not stop the applicant from offering this. While I understand this is a commercial venture, the applicant's approach ignores the material harm to residential amenity. The fundamental issue here is not just property values, but the severe degradation of living conditions for those bordering the site. There is something fundamentally wrong here, and I would ask the applicant to look much more carefully at mitigating this material harm, although I recognise it likely will not.

4. Flawed Traffic and Routing Strategy

There is currently a lack of enforceable DCO requirements regarding construction traffic. HGVs and drivers will inevitably take the quickest route without strict controls. How does the applicant suggest that traffic routes will be managed and enforced? I argue there should be mandatory GPS tracking of all HGVs and strict financial penalties for routing breaches. These mechanisms of control must be written into the binding DCO as a key requirement.

"Encouraging" car sharing is hardly a robust and workable solution to mitigate traffic impacts.

5. Size, scale, and relatively low electricity generation

It is generally accepted that the solar farm may have a capacity of 400MW energy generation, but on an annual basis, this will be much lower, closer to 10% of the capacity. The applicants have not addressed this point at all, simply quoting that solar is part of the country's energy policy and mix (Section 2.1.13). That alone does not justify a solar farm of this scale.

6. Disproportionate Loss of Prime Agricultural Land

The applicant still does not adequately address the material harm caused to the countryside and the disproportionate loss of Best and Most Versatile (BMV) agricultural land. This land will be lost, and land of this nature is a finite resource; for many people living in the area, this will be lost for the remainder of their lifetimes.

Based on Section 2.8.10, the applicant states that "It first defined a 15km Area of Search based on the need to be close enough to the Eaton Socon point of connection to keep the grid connection technically and commercially viable."

Why must an industrial solar farm be within 15km of Eaton Socon when there are many connection points in the UK? Their search should not have simply considered this substation. Are there lower quality brownfield sites across the country that are within 15km of a substation?

In addition, the applicant's search was constrained by land made available through voluntary landowner agreements, representing a clear failure of sequential testing, rather than a genuine, objective search for lower-grade (Grade 3b/4) land or alternative grid nodes (such as Little Barford). Developer convenience does not override the national policy directive (EN-3) to avoid BMV land.

Sacrificing 773 hectares of finite agricultural land to generate intermittent power is a highly disproportionate trade-off, and I respectfully ask the Inspectorate to carefully consider whether the permanent loss of Best and Most Versatile agricultural land is justified given the scale of the energy contribution actually delivered.

7. Impact on the Countryside as an Amenity for the Community

The applicant states how they have made improvements to the scheme including 2.1.54: "Solar development fencelines have been realigned to provide suitable buffers to public rights of way and to remove development from areas identified as

being within fluvial Flood Zones 2 and 3”, and “All public rights of way offsets were reviewed to ensure minimum buffers either side of PROW corridors, in response to consultation concerns about insufficient separation from paths.”

This area of countryside has many walking paths that people have enjoyed. Forcing pedestrians to walk through a huge industrial solar farm severely degrades the public amenity value of these routes.

In response to the applicant's statement 2.8.30: “It is the Applicant's position that given the considerable landscape mitigation proposed in connection with the Scheme (see oLEMP – [APP-159]) the scheme would not result in industrialisation of the Countryside.”

Mitigating the impact of an industrial solar farm of this size on the landscape is impossible. The above statement is like suggesting building houses doesn't lead to an urban environment.

Given that the sheer proximity of the panels and infrastructure to residential boundaries causes a devastating loss of visual amenity, outlook, and an increase in noise/disturbance, I believe the DCO must mandate much larger, strictly enforced separation buffer zones (e.g., minimum 400m) between the development and any residential areas to prevent further material harm.

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

Yours sincerely

Andrew Cox