

Response to Brockwell Letter Ref: EN010141/DR/8.67 - 05 August 2026

From Shaun Woodward – Interested party and local resident

18/08/2026

Dear [REDACTED]

I was surprised by the tone of the applicant's letter with respect to SEPE's submission at stage 5.

I take umbrage at the comments about repetition, claims to have already answered questions, and that IP's do not have the right to submit endless questions, I guess that's because they don't wish to answer many of them or acknowledge errors.

If the applicant does not respond directly to specific questions which have been asked, (often several times) by numerous IP's, there is little point in having interested parties involved in the process.

IP's are allowed to scrutinise the applicant's application in front of the Inspectorate, and to challenge and test elements as required. This occurs in stages. The applicant submits first, and the IP's and LA's respond. Any stage ending with an applicant submission without a corresponding chance for the IP's to reply is clearly unfair.

The comments raised about 'repetition of issues' and 'generalised responses' to specific IP questions (...or effective dismissal of them, by referring back to answers in earlier documentation,) is not acceptable, particularly where queries involve 'numerical' content.

I am not a lawyer, I don't use complex sentences to state procedural and planning protocols, or clever words to 'spin' and avoid issues. I expect simple direct answers to specific questions.

For example, when I raise a query about a specific subject such as the **unqualified total diesel usage** stated by the applicant, I don't think it's unreasonable to expect a response explaining how that figure was arrived at so it can be assessed and tested by both IP's and the Inspector.

A second example would be from my earlier submission where I carefully calculated and proved the number of vehicle movements stated by the applicant did not marry with the material being transported to site, such as aggregate, concrete and cement sand. etc. The information was presented as a clear table in my previous submission comparing material quantities with stated transport movements which I believe are

materially understated. I received no direct response to confirm or overturn any of my findings so I would be grateful if you could press the applicant again on all these points particularly my table, where questions remain unanswered and are very significant.

There are other issues that have been raised previously which have also not been precisely or properly answered. These relate to:

1/. Water usage – This seems grossly understated, when considering the figures include water for making concrete, screen planting, panel cleaning, wheel washing etc and particularly for fire-fighting purposes. For example, I calculated in my earlier submissions that cleaning the solar glass using only 500ml of water per sqm, would use over 1 million gallons of water alone for a single clean, which would use up most of the applicants stated usage making a mockery of their figures. Please press them on this issue and where the water will be sourced from.

2/. Positioning of a live gas main very near to the proposed new Bess site - This is a serious issue which has not been addressed properly, and is more pertinent now the gas operators are taking an interest, and because the applicant is still pushing the detail design and layout for the BESS compound and final specification beyond the issue of a DCO and therefore beyond IP public scrutiny. This is serious issue which should be properly scrutinized now, and a full design submitted before the DCO is granted to prove a safe design solution. Any Fire Service documentation supporting the application now cannot possibly be thorough or comprehensive if the final BESS design and it's proximity to a major live gas main has yet to be established. Surely this aspect should be resolved within the Inspectors oversight and whilst IP's are still able to test the design?

3/. Ground maintenance – The task of managing the grass and weeds within the site are understated. I calculated for a mower to travel past each of the arrays for a single cut, is **452km** journey. This does not include maintenance of areas not covered in BESS or panels, or the considerable 452km journey also required for panel washing.

Calc: If panels are 1.3m wide x 2.34m tall (from supplied EPE Canadian Solar sample panel spec sheet), stacked in pairs in portrait orientation on the supports, the maths are simple.

1.3m x 695,760 panels divide by 2, which as a continuous row of panels = 452km. This does not address the issue of strimming under the panels, only between them.

This should be acknowledged, and machine working included in lifetime GHG calculations.

4/. Sheep for grazing the site – My question about the practical use of sheep for grazing this proposed site is still unresolved, despite the applicants answer to my previous submission. I suggest even if sheep are only allowed within the fenced panelled areas of the site, they will be near impossible to shepherd in large numbers from these huge land

areas with arrays and infrastructure as major obstructions. Managing sheep in such a landscape will be very difficult. Even with rotation across the site, a significant flock will be required to keep the whole site grazed effectively and prevent some areas becoming over grown in peak season. Are landowners going to invest and manage such flocks which would represent about 10% of the county's current sheep population. I feel not. I also read that sheep do not always eat everything, leaving some plant species upstanding and still requiring mower cut. Sheep also have a carbon footprint. Minutiae matters here, because on balance I feel collectively such factors will combine in making sheep grazing impractical with grid scale low positioned panel layouts like EPE. The owners of established smaller solar schemes in our area, where it would be easier to use sheep have never done so. Why? I don't believe sheep will ever be used to graze this site if it goes ahead and suggest despite denials their inclusion is only included to enhance the applicant's 'green' credentials for the DCO and is in practice impractical for larger grid scale schemes. Time will tell.

5/. Incorrect material specifications - I questioned the accuracy of some of the material specifications for substantial infrastructure elements, where the wrong type of steel was quoted and incorrect CO2 figures were used for calculations deflating the carbon footprint by a significant amount. These are basic errors by the applicant but with major consequences for understating GHG calculations.

6/. Replacement of panels at the 20 year point - There were many questions about the applicant's plans for replacing all the panels and infrastructure and fencing at the 20-year mark, trying to position the total replacement of about 90% of the entire original infrastructure as 'maintenance'. A five-year rolling replacement with suggested minimal manpower for the changeover deserves to be questioned.

I argued in my last submission in detail about the likely unfeasibility of what was being proposed, both on commercial and numerical grounds using figures and examples. Those questions are all reasonable and should be specifically answered by the applicant, not waved away by referring to previous applicant submissions, the source of these questions in the first place, or stating there is no legal obligation for them to answer.

7/. Traffic at the A1 Eaton Ford Junction - There is still a large question mark over how the thousands of HGV vehicles and commuting traffic will join the A1 southbound. This has not been satisfactorily resolved. Rigid control of traffic and commuting must be included in the DCO and not weakened by allowing the entire unsuitable road network to be used for HGV traffic at the 20 and 40 year points.

8/. De-commissioning Bond – Many feel the applicant should create a watertight bond to cover the cost of decommissioning this massive site, and returning it to agriculture. This fund should be outside the control of the applicant or its parent companies or

future owners/operators. This is a sensible precaution to protect society as in 40 years the operators may well become insolvent leaving the problem to the public purse. I note in a recent submission the applicant states only £10M for the decommissioning stage, which seems unrealistic. Compared to the total cost of the project this seems pitifully low, particularly if the cost of recycling nearly 700,000 panels is taken into account. If this £10m figure is indeed correct why would the applicant even resist creating such a bond for such a small sum in the grand scheme which could be paid for by a small percentage of future income over say the first 10 years of the plant's operation?

9/. Recycling panel volumes - Finally, there has been no response to my observations and calculations for the recycling of panels after 20 and 40 years. I calculate the UK NSIP's alone will generate around 20 to 25 million degraded panels in quick succession in roughly 20 years time, and currently there is no recycling capacity globally that can deal with such quantities. The largest is in the USA which can process around 260,000 panels per annum. This is a big flaw in the application, and surely cannot be swept forward into the future without serious planning consideration from the outset. How can any projected carbon calcs be accurate, when should that situation happen today the only solution would be land fill. I note the applicant uses only a 100km distance from site to a future fictitious recycler, which is very understated. A more realistic target should be set for the purpose of GHG calculations. It is also perfectly possible that degraded panels in 20 years become worthless and become more expensive to recycle than to buy new, so the recycling market may not evolve as the developers expect it to.

The applicant will no doubt consider all such questioning as unimportant to the overall scheme, but I feel like many others that such errors and omissions buried in thousands of pages of documents create significant inaccuracies which all combine. If not corrected and confirmed now in the DCO they may also create impossible parameters for those constructing the site, where revisions will then be sought for practicality at a point then way beyond public scrutiny. That is not acceptable. The applicant's scheme should be tightly controlled within the DCO now on key issues affecting the locality and be obligated to give accurate figures to the inspector covering the duration of the life of the plant.

All the many errors compound to other parts of the application, particularly the carbon and greenhouse gas calculations, and the concentration of vehicles on the roads.

Ploys in 20 years to open all the unsuitable local roads to construction traffic (to the commercial benefit of the future operator) at future critical construction stages are all to the detriment of local communities so must be tightly controlled now within the DCO, not later.

I would be grateful if the inspector would follow up the issues above, particularly the ones which are calculable. They are not points of difference in opinion or theory in how the project should be approached, these are material figures, and maths don't lie.

Yours sincerely

Shaun Woodward - Keysoe resident, Interested Party