Submission ID: S933079BA

I strongly object to Frodsham Solar Farm. The application suggests wildlife losses that are neither avoided, mitigated, nor compensated.
The Mersey Estuary is a globally significant wetland hosting hundreds of thousands of migratory birds annually. Natural England's modelling and the applicants' own analysis confirm that Frodsham Marshes, especially within the proposed boundary, constitute functionally linked land to the Special Protection Area (SPA). Though degraded, the site remains critical for the same bird species and offers prime restoration potential. The solar farm, alongside other local schemes, would extinguish that opportunity. Instead of development, the land could enhance bird habitats and secure Biodiversity Net Gain (BNG) for Cheshire West. Amid intense regional development pressure, this last pocket of ecological value could be locked away for decades.
I oppose the project because of its inappropriate siting. I also challenge the design and details for failing to mitigate or compensate habitat loss, properly evaluate and deliver BNG, or account for cumulative effects with nearby proposals.
Mitigation Deficiencies
The proposals lack robust mitigation and would cause:
Loss of functionally linked land;
Partial destruction of a Local Wildlife Site;
Erosion of mitigation land established for the earlier wind farm.
No new habitat is offered. While some existing areas may be tweaked to suit birds better, the Biodiversity Net Gain metric still records a net biodiversity deficit.
Loss of Functionally Linked Land
The applicants claim the wider site sees "little use by SPA species", contradicting their own designation of it as functionally linked.
Compensation calculations borrow a Kent solar-farm method, yielding ~63 ha of offset land. This is unsuitable because:
Only three bird species are factored in;
Surveys are temporally patchy and omit many site sections across years;
The 63 ha lies within the pre-existing Non-Breeding Bird Mitigation Area (NBBMA) – already legally secured for the wind farm.
Effective mitigation must be additional, not a reshuffle of managed land. Moreover, the planned enhancements still produce a net loss in biodiversity units and fail to offset solar-farm impacts on the marshes.
Loss of Frodsham Wind Farm Mitigation
Planning consent for the wind farm required Cells 2 and 5 (~137 ha) to stay in favourable condition for [redacted] throughout the wind farm's life. The solar scheme would destroy or heavily impair this area without supplying replacement land beyond what is already committed. Shrinking and fragmenting this core zone undermines ecological resilience and wildlife viability.
Relying solely on the NBBMA for all marsh mitigation introduces acute risk: disease, future development, or other pressures could wipe out the fallback, triggering sharp declines in bird and wider marsh populations.
Loss of Local Wildlife Site
Beyond international importance for wintering birds, the site holds county- and local-scale value for diverse species.
On-site grassland supports foraging, yet this is inadequately addressed.
The proposed 5 ha skylark mitigation plot is grossly insufficient; research indicates densities of [redacted] would demand far larger areas (even at maximum density) outside the NBBMA.
At landscape scale, Frodsham, Helsby, and Ince Marshes remain one of Cheshire's largest open grasslands and a flagship site in the emerging Cheshire Local Nature Recovery Strategy. It offers major scope for habitat restoration and natural-capital investment (BNG, nature-based solutions). Its loss would deal a lasting blow to nature recovery across Cheshire and the UK.
Biodiversity Net Gain (BNG) Shortfalls
Pre-application pledges to deliver BNG have been downgraded, excluding watercourses. Unlike other projects, BNG has not shaped the design. Although NSIPs lack mandatory BNG, voluntary adoption demands full compliance: accurate metric completion, trading-rule adherence, best-practice standards, and robust evidence.
The developer's metric raises grave issues:
Land beneath panels is misclassified; UK Habitat guidance would label it "sealed surface" or at best poor-condition grassland – almost certainly pushing the scheme below the 10 % gain threshold.
Trading rules are breached for reedbed – a Priority Habitat vital for UK birds. Applicants excuse non-compensation by citing poor condition, subverting BNG principles.
Essential supporting material is absent: habitat-replacement justification, blank condition-assessment sheets, and missing habitat-code maps. This blocks proper scrutiny.
Overall, the scheme violates CIEEM good-practice tenets (additionality, transparency, mitigation hierarchy) and NPPF policy. A flagship national infrastructure project voluntarily adopting BNG should exemplify excellence, not minimalism.
Cumulative Impacts
Three developments warrant combined assessment:
Hynet Runcorn CO, Spur Pipeline (Ref 78) – recently rerouted through the NBBM applicants. Approval would sabotage mitigation hinged on NBBMA integrity.
Hynet Hydrogen Pipeline (Ref 38) – crosses the proposed Skylark Mitigation Area, chosen despite known overlap.
Pipeline effects are labelled "short-term/temporary", yet the Ornithology Chapter flags cumulative risks to breeding birds (skylark, lapwing) from disturbance and habitat loss. No analysis addresses impacts on the mitigation area or displaced skylarks.
Existing Frodsham Wind Farm – omitted from cumulative discussions despite losing core mitigation zones without replacement. These are substantial unaddressed effects.
Proposed Morgan and Morecambe Offshore Wind Farm Generation Assets and Transmission Assets.
Other Matters:
Examination issues weighted too favourably (7.5–7.6);

Decommissioning and long-term habitat-retention uncertainty (7.30);
Inadequate bird-survey data (7.36);
Insufficient monitoring frequency (7.48);
Phasing of construction works as mitigation
Absent reptile surveys (7.113);
Need for further peat investigations (8.7).
Environmental Assessment:
Environmental Assessment is complex and too challenging for a layperson to read, understand and assess the potential impacts.
Visual Impact Assessment (VIA):
Site Scale: Solar array ~1.8 km × 2.7 km; highly visible from most of Frodsham.
VIA Flaws (analysed via Viewpoint 9 – Frodsham Hill War Memorial, with unrestricted panoramic view; principles apply to many other viewpoints)
Baseline Description Undervalues Farmland: Describes marshes as "prominent features" amid industry, but farmland is the dominant character — green fields providing visual relief from surrounding housing/industry. Mentions irrelevant industrial features 75° outside the view.
Mischaracterises Impact as "Incremental": Claims solar array adds only a small increase to existing industrial influence. Reality: Covers ~70° of panorama; doubles the visual area of chemical industry (Rocksavage to Weston Point); triples industrial dominance.
Incorrectly Claims View Remains "Essentially the Same": Baseline = varied green farmland with peripheral industry. Post-development = solid black panel array; character shifts from agricultural with industry to industrial with green patches.
Wrong Conclusion: Effects deemed "not significant" due to flawed analysis.
I strongly believe this proposal should be withdrawn immediately.