I have already submitted one complaint about this project in the initial stages and should take that and its legal implications particularly the objection made with regard to fraudulent statements throughout the application into consideration yet again. Failure to do will put the planning authorities in breach of law the application is up held in any form or part, and the Secretary of State if they take this into their own hands.

I shall send the detail back you once again but to summarise:

- 1) The application makes fraudulent statements as to potential output, benefits, community benefits and by making false assumptions of the environmental impact ... if planning consent is granted these fraudulent statements will become an object of legal restraint and the planners will be considered complacent as well as complicit. The planners are duty bound to make independent assessment of those frauds and draw the appropriate conclusions which is that they are misleading and inaccurate statements.
- 2) This particular land is not appropriate for this technology. This fact is also particularly relevant as there is already inappropriate technology on the site. There are alternative sites even in the locality next to the Iggesund site in Seaton for example with far better solar qualities and in semi-urbanised area. Solar farms are a form of urbanisation and the planners must take that into consideration in a location that is both rural and close by to areas of outstanding natural beauty and a national park.
- 3) The site is largely reclaimed former open cast mining. It has known issues with infill and methane gas trapped below. Indeed there was an incident in which workmen preparing the site for the wind turbines nearly became fatalities when gas was released. If a fire occurred in the battery complex or in the ground from the effect of the solar panels overheating it is likely that this might ignite the hidden gas. The batteries, primarily because of use of lithium which is an unsafe fire risk at every level as any fire chief will tell you a fire hazard difficult to put out and burns at excessive temperatures. I propose you reassess the fire hazard forthwith.
- 4.) The planned sight will create flood risks particularly flash floods into the River Marron threatening local inhabitants and beyond that flooding in the Derwent too. This is because the amount of solar panels is equivalent to a non-absorbent glass surface of nearly 180 miles of a normal trunk road. The effect of any rainfall will be to create surface run-off and at least 75% possibly 80% will end up in the River Marron catchment and the remainder creating a wider lake or bog also undermining the wind turbines almost directly, particularly if the ground is hard or saturated. This area has been subject to regularly rainfall exceed 2 inches in a 24 hour period. Indeed there have been two incidences of this level of rainfall since this planning process first started. This is my expert opinion and I qualify that expertise other than a degree in Geography from Lancaster, but also relative to my father (who wrote the bible on the Nile watercourse) in my first written submission. I propose that no-one other than a qualified hydrologist confirm the data of the effect of say 2 inches of rain in 24 hours given the possible effect high rainfall on the amount of panels in a 700 acre site as projected.
- 5.) There 22 red listed birds observed on the site, according to the applicant's specialist diversity report. If that is the case then the dangers of solar panels has not been properly assessed. One being that when it is hot, solar panel temperatures are sufficient to damage birds, and bird scarers would not have the desired effect.
- 6) The site is situated between two major areas requiring specific visual impact protection. The Lake District National Park to the East. Even if the topography is not always clear or the weather conditions, and to an Area of Outstanding Beauty to the North, and North by North West in the Solway Forth. This makes for unsightly disposition along with all turbines, and the recent precedent in Northumbria sets an example for all rural sites.
- 7) The unintelligible process which fails British standards is a further warning, along with all the other points in the refusal of the application first made. Starting at the top of the Department.

Signed:

James Christopher Francis Howell



If you need a signature I can oblige.