



Planning Inspectorate
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7th October 2025

I am in receipt of your email regarding a letter sent by ib vogt taking an aggressive stance to the planning process and suggesting the application remains unchallenged and uncontested. This is most certainly not the case and I am reiterating my own contention and others that this proposed solar farm has absolutely no merits whatsoever in this location, which is neither suitable nor advantageous compared even to local more urbanised alternatives on the coast where the amount of solar input is greater. That the application (just as the assertion that it is “unchallenged” is based on a whole set of bullying falsities, and whose only relevance to the applicant is neither climate change or contribution to “net zero” or local benefit, but purely commercial financial gain. I would also add to that, at some cost also to the UK taxpayer.

1. There is local opposition to this proposal. It just hasn't been coordinated. I have come across this myself in local discussions and should also state that I was informed of the bullying tactics at local meetings by the applicant where the natural politeness of enquiry by locals was overridden and muted by arrogant false assertions of impact by the applicant and its advisers, asserting so called “expertise”. Advisers who I would say live in cloud cuckoo land and whose professional competence is only merited by their own financial gain from putting across notions that are only deserving of Disney World and very little by the factual content of their estimates. And they are all only projections or estimates based on entirely overestimated projections. To suggest that Dean & Distington Parish Council is representative of popular appeal of the proposed solar farm is disingenuous. The said parishes are being “bought” by the Applicant in a process that can only be at best described as “bribery” and gives the actual appearance of corruption. Local community benefit means actual benefits derived from the proposed project, whether in long term viable employment or reduced energy costs across the broader region whilst electricity is generated (from the supply) or other meritable benefits directly applied from the site location . It does not mean a slush fund to a few locals distributed as “parish funds” as compensation. The fact that it is compensatory only indicates the lack of merits of the proposed site. The only merit they have been falsely sold is that this proposed site will substantively contribute to national “net zero” (rather than this a national Government aim). The answer to that even with false claims of projected output is that it will not.
2. My late father (whose expertise I have outlined in guiding my own expertise on these matters along with my university degree including both his CMG and OBE awarded in recognition of that specific expertise along with his being a Faculty Director/Professor, Fellow and Senate member of Cambridge University and on the Board of Sussex University) would comment about most of the statements of the so-called expert advisers (commercial operators) as being either “balderdash” or less politely “bollocks” or “balls”. I can quite explain why in each and every case of each statement or reply.

I cite you two examples for brevity.

One involves the reply to my statement about the assertions of capacity. The Applicant's reply explains the deceit of the original claims in full, which I am sure the Inspectorate has or will have garnered. The other about my pointing to flood risks which need a detailed properly engaged survey. For Cumberland Council to waive this off (judging by their enquiry) is only indicative of their previous incompetence with regard to flooding in the entire region and its consequences. Recently, along the road running by my residence, recent rains accumulated in a section of only a matter of 500 metres a pool of water of 1 foot extending to some fifty metres block the traffic for some hours whilst the local farmer carved four large culverts into the field below the road to release the large cubic metres of water that gathered in only eight hours overnight. The proposed Dean Moor site will contain the same road equivalent of over a hundred miles of hardened impervious surface. 2” of rainfall over a 24 hour period would accumulate 65,000 cu metres of water (15 million gallons/65 million litres then channelled along into the much smaller area between the lines of panels. This then causes topsoil erosion and channelled gullies into the water will flow directly.

3. The point is that this is a reasonably steep sided site almost 1 in 8 in most sections. This means that channelling will occur and the site has numerous examples of natural gorging, in any case, indicating its susceptibility. Because it is steep, water has to go somewhere and gravity does the rest. No amount of remedial "barriers" envisaged (part of the Disney World) will suffice and this solution simply "does not cut it" in restraining this level of water. It is as my late father would say, and his hydrologist team in unison, [REDACTED]

People so often underestimate the power of water. Add to this the instability of the low lying and backfilled grounds and you have an eventual disaster on your hands. The applicant has paid no heed to this and simply wants to impose its Disney World inventions on us all. Any barrier would have to provide an area of natural surface equivalent to that lost by the area of grassland covered over by the solar panels. Also it should be noted that underneath the solar panels will become partially shaded, restricting vegetation and because of the north facing slope be permanently horizontal (another Disney like illusionary assertion created by the Applicant that the solar panels can be angled to meet the winter sun when it projects from a southerly azimuth excluded by the hill.)

All these arguments the authorities have alluded to in their statements and enquiry. But there is a clear intent to whitewash this site for approval by the applicant and its associates. A case in point is the fact that 22 red listed birds have assumedly been identified as using the site.

To say that a solar farm will neither effect or detrimentally alter the habitat is a gross misstatement of actual fact and to suggest that the applicants remedial efforts will compensate is also a misstatement that has no credulity amongst those who properly know what they are talking about, naturalist included. It is as inane as the argument that sheep can "softly graze" beside solar panels which as any farmer and most solar operators will tell you is a complete fallacy (more Disney World). The likelihood of sheep damaging the panels exceed any probability to the contrary.

Given the inclement weather it is likely that sheep will either use the panels as shelter, or take advantage of the warmth of the panels and jump on them causing significant damage. Sheep can jump quite well and often found perched on isolated rocks in the region particularly rams. This type of nonsense that the Inspectorate are being asked to believe reflects a wanton condescending arrogance that has to be weighed up by the abuse of public money to assess a site that obviously has no advantageous merits even commercially in comparison to alternative sites or indeed technologies, other than machinating the statistics to suit some superfluous net zero obligation.

Which brings me on to the question of quoted capacity. I attach an image of the Applicant's unsatisfactory reply. Unsatisfactory because it doesn't address the point I made that the estimate provided are grossly exaggerated to the actual potential output of solar farm generator of this size located where it is proposed. My question also alluded to existing comparable sites and their actual output which are substantially less than that outlined by the Applicant. Instead you are given a perfunctory statement of supposed qualification and also, I quote:

"50MW figure provided in the Preliminary Environmental Information Report is the threshold for the application to qualify as a Nationally Significant Infrastructure Project"

So now we know! This how the figure published for public scrutiny was arrived at. I seriously think that in all good judgment that Inspectorate should reconsider the application on that basis alone, and perhaps accept my earlier contention that it should not have been approved for further consultation. This is because to achieve that level of energy output the farm would have to be in my estimates almost twice the size in area. Even making allowances for more optimistic consideration of both sunshine but importantly cloud cover (which is a particular factor of this locality) it still falls short of the quoted "threshold". On these grounds alone the application should be failed, irrespective of the negligible popular acceptance of this project application, and rather the quite considerable even though muted opposition to it.

I have to reiterate that every single point (almost the entirety of the application) that I have raise similar fudges designed to promote the idea rather than present the hard facts. The fact that the site is unsightly in a locality bound by sizeable natural areas of international importance and also contributes a significant level of urbanisation to a fragile environment recovering from its previous mining exploitation should also stand alone as a reason for rejection. I point again to the rejection of a similar Northumberland solar farm application on those grounds alone. The Lake District National Park has its own authority to make observation but the Solway Are of Outstanding Beauty does not. The fact that the majority of the site slopes steeply northward means that no amount of "screening" will suffice and is disingenuous to suggest otherwise.

However, if the application goes ahead it will be legally bound by statements that have been made. Proof will be in the pudding as actual output will be recorded and publicly available from Electricity North West. If these fall below the states projection then both applicant, and its associates, as well as the Planning Inspectorate and indeed the local government and the government (including the present Secretary of State) will become accountable and in some case legally liable. I expect the Inspectorate to put that question to ig Vogt and whether they are still prepared to endorse this project and its application based on the assumption made by the applicant and the risk penalties in fines (also on its private equity owners) in the billions not just millions should it prove to consistently less. Notwithstanding the media attention their organisation will endure.

That might put some professional standards into the frame and question their professional integrity as to why they wished to pursue this application for a site that has no apparent merits of viability apart from just being a commercial transaction.

Finally, the argument that the national interest exceeds the obligations to preserve our natural environment and an important fragile regenerating natural moorland area as well as its important scenic qualities is not only debatable but almost certainly [REDACTED]

The proposed solar farm will have negligible impact on global climate change or carbon balances. Situated adjacent or rather, within two large areas of the highest levels of natural distinction is not only contentious even if presently given over to pastoral farming. It is not only the food security aspects but the fact that biodiversity will be severely impacted whatever so called remedial "havens" supply. Many different species occupy from time to time the land that the solar panels will cover, and all of them will be precluded from the extensive area covered over. [REDACTED]

[REDACTED] I had asked Curlew Action to intervene but they were tied up by limited resource and their successful actions in Northumberland and Yorkshire on similar moorland abuse by similar Disney World solar farm applications.

More importantly it certainly will have a scenic and visual impact unnecessarily burdening the fragile nature of this particular site and has little value if any, other than lining the pockets of of the applicant and its associates, and two parish councils.

I hope that you will accept this letter representative of both local and national opposition to this application. I most would like to engage directly with the applicants plus to question as to why ig Vogt persist in this application when other sites could be found with alternative better prospects.

I have earlier made the case that just building one nuclear SMR more than fills the regional obligation to notional national "net zero" obligations and is a far better alternative than either wind or solar. I hope that you take this into consideration as well.

Neither the public or nation are served beneficially by this project or in the most constructive or benign manner.

I hope that you will convey to ig Vogt that there is considerable opposition to this application and you should not be hoodwinked into thinking otherwise

[REDACTED],
Yours sincerely,

[REDACTED]

James Christopher Francis Howell