

Submission ID: S08D6245D

## Summaries of Submitted Documents

### Comments on the Applicant's Funding Statement

This document reviews the Applicant's Funding Statement submitted at Deadline 1 and highlights the absence of secured funding, reliance on future financial arrangements, and lack of evidence demonstrating the Applicant's ability to deliver and maintain the Scheme. It raises concerns about financial resilience, long term liabilities, and the adequacy of the Applicant's assurances, noting that the Funding Statement does not meet the level of certainty expected at DCO stage.

### Comments on the Applicant's Statement of Need

This document comments on the Applicant's Statement of Need submitted at Deadline 1, identifying overstatements of urgency, misinterpretation of national policy, and a failure to justify why this specific location, scale, and configuration are required. It highlights gaps in the Applicant's reasoning and demonstrates that the claimed need does not override the unresolved environmental, land use, and community impacts.

### Comments on the Applicant's Statement of Reasons

This document comments on the Applicant's Statement of Reasons submitted at Deadline 1, focusing on the lack of a fixed design, excessive land take, and insufficient justification for compulsory acquisition. It shows that the Applicant has not demonstrated that the land is necessary for the Scheme, nor that impacts have been minimised, making the case for compulsory acquisition incomplete and unproven.

### Environmental Statement Critique

This document comments on the Applicant's Environmental Statement, highlighting major gaps and uncertainties caused by an un fixed Scheme and extensive post mitigation measures, and construction impacts remain unsettled, meaning the ES assesses assumptions rather than the real project. The Human Health chapter also relies on uncertain inputs and future plans, so it cannot demonstrate that impacts on residents have been minimised. Overall, the ES does not provide a sufficiently defined basis for assessing environmental effects or justifying compulsory acquisition.

### Evidence of Post Consent Deferral

This document provides a consolidated review of the Applicant's Deadline 1 submissions, highlighting extensive post consent deferral of essential design detail and mitigation. Drawing on direct quotations from Chapters 3, 4, and 18, as well as the Outline CEMP and LEMP, it demonstrates that key elements of the Scheme — including infrastructure locations, cable alignment, construction management, and landscape and ecological mitigation — will only be finalised after the DCO is granted. This level of uncertainty prevents the Environmental Statement from assessing a fixed Scheme and undermines the reliability of the Applicant's impact assessments and justification for compulsory acquisition.

Note on AI Assistance: Microsoft Copilot was used to assist in reviewing the Applicant's Deadline 1 documents, extracting relevant text, and preparing comments. All judgments, conclusions, and submission decisions remain the responsibility of the submitting party.

# Comments on the Applicant's Funding Statement

## Comments on the Applicant's Funding Statement (EN010168-000536)

### 1. Introduction

I am not a planning lawyer or a financial analyst. I'm simply a local resident trying to apply ordinary common sense to what seems an extraordinary proposal. And from where I'm standing, the Applicant's Funding Statement reads less like a solid financial plan and more like the sort of pitch you'd get from a very enthusiastic car salesman who insists the engine "definitely works" but won't let you lift the bonnet.

We are being asked to trust a company that has not secured funding, has not presented a financial track record, and is simultaneously juggling multiple billion-pound projects. It feels like putting all our national energy eggs in one basket — and then handing that basket to someone already sprinting down the road with a basket in each hand, so ours ends up balanced on their head.

History is full of moments where people were dazzled by big promises and shiny ideas: Tulip Mania, the South Sea Bubble, the Dot-com boom. More recently we've seen Carillion, Thames Water, HS2, Bulb Energy, and the Horizon IT system at the Post Office. Big promises, glossy presentations, absolute confidence... right up until everything collapses. And when it does, it is always the public who picks up the pieces.

Yet here we are being told to approve a project because the company has other schemes in the works and their consultants told them they "could" get funding. Enthusiasm is not evidence. And once a developer collapses mid-project — as we have seen in other sectors — the community is left with the mess, the cost, and the consequences. There is no magical "undo" button for torn-up countryside. And in this case, we are talking about more than 2,000 acres.

Based on the Funding Statement, this feels far too much like a "pie in the sky" scheme being sold by people who will not be the ones picking up the pieces if it all goes wrong.

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### 2. Systemic Risk: The Applicant Is Promoting Multiple NSIPs Simultaneously

The Applicant (IGP) is currently promoting several large-scale solar NSIPs across the UK, each requiring very substantial capital expenditure. The Funding Statement does not explain how the Applicant or its parent companies will manage the cumulative financial exposure of these schemes. EN-1 requires applicants to demonstrate that their proposals are financially viable and deliverable (EN-1 §4.2.1).

If even one project encounters financial difficulty, delay, or failure, the consequences would not be limited to a single location. Communities across several counties could be left with partially constructed or abandoned infrastructure, and the financial burden of remediation would fall on the public sector.

Solar NSIPs of this scale involve irreversible land take and long-term landscape change. If a developer becomes insolvent mid-construction, the damage cannot be undone. The Funding Statement provides no assurance that the Applicant has the

financial resilience to deliver multiple NSIPs concurrently, nor does it address the systemic risk of concentrating several nationally significant energy schemes in the hands of a single private developer.

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### 3. Macquarie Asset Management’s Track Record in UK Infrastructure

The Applicant relies heavily on the scale and reputation of Macquarie Asset Management as reassurance that the Scheme can be funded. However, Macquarie’s track record in UK infrastructure raises serious concerns.

During its ownership of Thames Water (2006–2017), debt reportedly rose from around £3.5 billion to approximately £11 billion, while the company was widely criticised for under-investment, leakage, and pollution. After Macquarie’s exit, Thames Water was left in such a weakened financial position that government intervention — even temporary nationalisation — has been discussed.

This pattern illustrates a model in which value is extracted for investors while financial and operational risks are ultimately borne by the public. The Funding Statement does not acknowledge this history or explain how similar outcomes will be avoided for Lime Down. EN-1 requires applicants to demonstrate that risks have been properly assessed and mitigated (EN-1 §4.4.2).

If a Macquarie-backed project such as Lime Down were to encounter financial distress, the Thames Water precedent suggests that the public could again be left carrying the risks and costs. In the context of a solar NSIP, that would mean altered land, part-built grid infrastructure, and long-term environmental harm, with no guarantee that the original developer would be there to remedy it.

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### 4. No Commitment from the Parent Company or Macquarie

Although the Applicant repeatedly refers to the size and global reach of Macquarie Asset Management, no letter of support, guarantee, or binding commitment has been provided. There is no evidence that Macquarie has approved or agreed to fund this project, nor any indication that capital has been allocated or ring-fenced.

Reliance on the reputation of a parent company is not evidence of funding availability. The 2013 Compulsory Acquisition Guidance requires “reasonable certainty” that the project will be funded (CA Guidance §12–14). Lime Down provides none.

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### 5. Reliance on Consultant Advice Instead of Financial Evidence

The Funding Statement states that the Applicant is “confident” the Scheme is commercially viable because its advisors have said so. Reliance on consultant opinion is not a substitute for financial evidence.

The Applicant has not provided a business case, revenue model, sensitivity analysis, or any demonstration of commercial viability. Assertions of confidence do not meet the evidential requirements of the Planning Act or EN-1’s requirement for clear justification of project need and deliverability (EN-1 §4.1.4).

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## 6. No Secured Funding for a £900–£950 Million NSIP

The Applicant confirms that no funding has been secured for the Scheme. The Funding Statement states that the “final investment decision would be made after the DCO is granted.”

This means the Applicant is not committed to delivering the Scheme and has not demonstrated that it has the financial resources to do so. For a project seeking compulsory acquisition powers, this is a significant omission. The Secretary of State must be satisfied that the project is likely to be funded (CA Guidance §13). The Applicant has not provided the evidence required to reach that conclusion.

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## 7. The Applicant Company Appears to Have No Financial Standing

Lime Down Solar Park Ltd is a special-purpose vehicle with no apparent assets, no revenue, and no track record. The Funding Statement provides no financial information for the Applicant or any company in the ownership chain.

Without accounts, balance sheets, or evidence of liquidity, it is impossible to assess the Applicant’s financial capacity. This is particularly concerning given the scale of the Scheme and the request for compulsory acquisition powers. EN-1 requires clarity about who is responsible for delivering the project and evidence that they are capable of doing so (EN-1 §4.2.1).

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## 8. No Cost Breakdown or Evidence Base for the £900–£950m Estimate

The Funding Statement provides a single headline figure for the cost of the Scheme but no breakdown of construction, grid connection, land acquisition, BESS, contingency, or inflation assumptions. Without this information, the estimate cannot be scrutinised for accuracy or robustness.

The absence of a detailed cost breakdown is inconsistent with expectations for NSIPs of this scale and does not meet EN-1’s requirement for clear, evidenced justification of project design and configuration (EN-1 §4.4.2).

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## 9. No Mechanism for Funding Compulsory Acquisition Compensation

The Applicant asserts that compensation can be paid but provides no mechanism, no ring-fenced security, no worst-case modelling, and no evidence of available funds. The Funding Statement does not explain how compensation liabilities will be met, nor does it provide safeguards to ensure that landowners and affected parties are protected.

This is inadequate for a scheme seeking powers to acquire land compulsorily. The CA Guidance requires applicants to demonstrate that adequate funding will be available at the time it is required (CA Guidance §13–17).

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## 10. Comparison with Other Nationally Significant Energy Projects

When you place Lime Down’s Funding Statement alongside those submitted for other major energy NSIPs, the gap is not subtle — it is stark. Cleve Hill Solar Park, EA1N,

and Rampion 2 all provided detailed, evidenced, and verifiable financial information. Lime Down provides almost none of it.

### 10.1 What the other NSIPs provided — and Lime Down did not

Across Cleve Hill, EA1N, and Rampion 2, the Examining Authority received:

- a clear and evidenced project cost
- a breakdown of major cost components
- audited accounts for the developer and parent companies
- evidence of liquidity and financial resilience
- secured or committed funding arrangements
- accepted grid connection offers
- construction and procurement strategies
- corporate guarantees or letters of support
- mechanisms for funding compulsory acquisition
- a proven track record of delivering major UK infrastructure

These are the evidential foundations required by EN-1 (especially §§4.1–4.4) and by the CA Guidance.

### 10.2 Lime Down’s Funding Statement falls far below this standard

Lime Down provides:

- a single round-number cost estimate with no breakdown
- no secured funding
- no financial information for the Applicant or ownership chain
- no liquidity evidence
- no parent-company guarantee
- no grid connection certainty
- no deliverability evidence
- no mechanism for funding compulsory acquisition
- no track record of delivering NSIPs

This is not compatible with EN-1’s requirement for clarity, justification, and deliverability (EN-1 §§4.1.4, 4.2.1, 4.4.2) or with the CA Guidance’s requirement for reasonable certainty of funding.

### 10.3 A common-sense conclusion

If three major NSIPs can provide full, transparent, and verifiable financial evidence, then Lime Down — a project of comparable scale — should be expected to do the same. Right now, it does not even come close.

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## 11. Conclusion

The Funding Statement never deals with the most obvious, common-sense risk: if the developer runs out of money halfway through, the land will already be dug up, the grid works half built, and the community will be left staring at the mess. This is not a far-fetched scenario — it happens in big projects more often than anyone likes to admit. And once the countryside is torn up, you cannot simply press a reset button.

What makes this even more worrying is that the same company already has two other huge solar projects on its plate. In ordinary life, most of us would struggle to juggle three major commitments at once — never mind three billion-pound infrastructure schemes. It seems only sensible to say: prove you can successfully build and connect the first two before you are handed a third.

Right now, there are no safety nets. There are no guarantees and no real proof that the company behind this can actually see it through. If things go wrong, it will not be Macquarie or the Applicant dealing with the fallout — it will be the public.

Until the developer can show they have the money, the backing, and the resilience to finish what they start — and until their other projects are actually up, running, and delivering power to the grid — this Funding Statement is simply not good enough for a project that wants the power to take people's land.

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#### Note on AI Assistance

I used Microsoft Copilot to assist with reviewing publicly available documents for other Nationally Significant Infrastructure Projects (including Cleve Hill, EA1N and Rampion 2) in order to compare their Funding Statements with the Applicant's. Copilot helped me identify where those projects provided evidence required under EN-1 (particularly §§4.1–4.4), EN-3 (where relevant to solar generation infrastructure), and the 2013 Compulsory Acquisition Guidance (§§12–17). Copilot also assisted in organising this information into a comparison table and in refining the structure, clarity, and presentation of this submission. All arguments, concerns, and conclusions expressed are entirely my own.

## Comments on the Applicant's Statement of Need

Comments on the Applicant's Statement of Need (EN010168/APP/7.1)

Submitted by: *Joan Bassler, Interested Party*

Application Reference: *EN010168 – Lime Down Solar Project*

## **1. Introduction**

I have read the Applicant's Statement of Need, and as a layperson I am trying to understand how the conclusions they draw follow from the evidence they present. The more I read, the more I struggled to reconcile the Applicant's claims about "urgent national need" with the scale, location, land take, and impacts of the proposed Scheme. The government's Net Zero targets do not remove the requirement in EN-1 and EN-3 for Applicants to justify the specific scale, location, land take, and configuration of their proposal. National need does not override the need for evidence.

The Applicant's Statement of Need skips the evidence and jumps straight to the conclusions. It assumes the scale, the land, and the 500 MW — instead of proving any of them.

My comments below are based on the Applicant's own text and on what EN-1 and EN-3 require a Statement of Need to demonstrate.

## **2. The Applicant treats "urgent national need" as if it overrides all other considerations**

The Statement of Need repeatedly states that the UK faces an "urgent need" for new low-carbon energy (§1.2–1.4), that the UK must "decarbonise rapidly" (§2.1–2.4), and that large-scale solar is "essential" to achieving Net Zero (§3.1–3.4). It also claims that this specific Scheme will "help meet urgent national need" (§5.1–5.3) and is "critical" to future Carbon Budgets (§6.1–6.3).

I do not dispute the importance of decarbonisation.

However, EN-1 is clear that national need does not override the requirement to justify:

- this location
- this scale (500MW)
- this land take (1,237 ha)
- this design
- this level of impact
- or the use of compulsory acquisition

EN-1 §4.2.1 requires Applicants to demonstrate that the specific proposal is needed, not simply that "energy is needed."

EN-1 §4.4.2 requires a balanced assessment of benefits and harms.

EN-1 §4.1.4 requires clear justification for the chosen site and configuration.

The Applicant has not done this. They use national policy as a blank cheque, as if quoting EN-1 automatically validates every aspect of the Scheme.

3. If the Applicant relies on Net Zero, why is there no assessment of the carbon value of the land as it currently exists?

If the Scheme is justified on the basis of reducing carbon emissions (§2.1–2.4; §3.1–3.4), then EN-1 requires a balanced assessment of:

- carbon stored in soils
- carbon stored in hedgerows
- carbon stored in grasslands
- greenhouse-gas processing capacity of farmland
- emissions released by disturbing 1,237 hectares of land
- emissions from manufacturing and shipping solar panels from overseas

EN-1 §5.2.2 requires Applicants to assess both carbon benefits and carbon losses. EN-1 §4.4.2 requires a “balanced view of the overall carbon impact.”

None of this appears in the Statement of Need.

It feels as though the Applicant is counting only the carbon benefits of the Scheme, and none of the carbon losses. As a layperson, I cannot understand how this provides a balanced assessment.

#### **4. Did the Applicant consider the well-being of the people who live here?**

The Statement of Need focuses entirely on national-level benefits (§1.2–1.4; §5.1–5.3). It does not address:

- the mental health impacts of industrialising a rural landscape
- the loss of cultural identity tied to countryside and farmland
- the effect on people’s sense of place
- the stress of living beside a 1,237-hectare construction site
- the long-term impact of a 40-year industrial installation

EN-1 §4.2.1 and §4.4.2 require Applicants to consider local impacts, including:

- community well-being
- landscape character
- amenity
- cultural identity

These are not abstract concerns. They are real, lived experiences for the communities affected.

I cannot see where the Applicant has meaningfully considered them.

#### **5. Why a 500MW scheme? Why not a smaller, locally determined one?**

A solar scheme becomes an NSIP at 50MW. The Applicant chose ten times that threshold.

EN-1 §4.1.4 requires Applicants to justify the scale of the development.

EN-3 §2.48 requires Applicants to explain why the chosen scale is necessary to meet the stated need.

The Statement of Need does not explain why this Scheme must be 500MW. It simply states that “large-scale solar” is needed (§4.1–4.5).

If the Statement of Need is the justification, then I would expect to see:

- why 50MW was insufficient
- why 100MW or 200MW was rejected
- why a distributed set of smaller schemes was not considered
- why this exact location must host a 500MW scheme

None of this is provided.

It feels as though the scale was chosen first, and the justification added afterwards.

## **6. Did the Applicant consider that Net Zero is not achieved by exporting our carbon footprint?**

The Applicant’s Statement of Need treats Net Zero as a simple matter of generating more low-carbon electricity (§2.1–2.4; §3.1–3.4). But the UK’s emissions have fallen partly because we import high-carbon goods from countries with weaker environmental protections. A solar farm in Wiltshire does not change the UK’s reliance on imported high-carbon goods, nor does it address the embedded emissions in the manufacture and shipping of solar panels from overseas.

EN-1 §5.2.2 requires consideration of life-cycle emissions, not just operational emissions. Yet the Statement of Need does not address the carbon cost of disturbing 1,237 hectares of farmland, removing hedgerows, altering soils, constructing access tracks, or importing industrial components. As a layperson, I am not disputing the importance of decarbonisation; I am questioning whether this particular Scheme meaningfully contributes to it in a way that justifies the scale of harm.

The Statement of Need also presents the UK’s energy challenge as if solar were the only meaningful pathway to Net Zero. In reality, the UK already uses a mix of renewables — including hydropower, tidal stream projects, and small river turbines — all of which contribute to grid stability and decarbonisation. EN-1 requires a balanced view of the energy system, yet the Applicant’s document omits these existing technologies entirely, creating the impression that only a 500MW solar scheme on 1,237 hectares of farmland can meet national need. This is not an accurate or complete representation of the UK’s energy landscape.

## **7. The Rochdale Envelope makes it even harder to understand the claimed “need”**

The Applicant keeps large parts of the Scheme undefined, yet relies on the Statement of Need to justify the maximum land take and the maximum flexibility.

- EN 1 §4.2.1 requires clarity about what is being proposed.
- EN 1 §4.4.2 requires a clear link between need and design.
- EN 1 §4.1.4 requires justification for the chosen configuration.

If the need is so urgent and so clear (§1.2–1.4; §5.1–5.3), why can't the Applicant say precisely what they intend to build in order to meet that need? In the absence of this clarity, it is impossible to understand how the claimed need translates into the specific amount of land, infrastructure, and flexibility being sought.

The wide Rochdale Envelope makes it difficult for me to understand how the land take relates to the claimed need. EN 1 requires the Applicant to demonstrate the project-specific need for this development — **why this project, in this location, at this scale, with this land take, in this configuration, and with this level of flexibility**. The wide Rochdale Envelope prevents any clear link between the claimed need and what the Applicant actually intends to build.

## 8. Conclusion

The Statement of Need is used by the Applicant to justify the scale, land take, compulsory acquisition, the Rochdale Envelope, and the lack of local consideration — but without providing the project-specific evidence that EN-1 and EN-3 require. Instead of assessing alternatives, the Statement of Need treats them as unnecessary; instead of explaining why 500MW is required, it simply asserts that “large-scale solar” is needed; instead of justifying the 1,237-hectare land take, it assumes it.

What the Statement of Need does *not* explain is:

- why this scheme must be 500MW
- why it must be in this location
- why it must take 1,237 hectares
- why smaller or distributed schemes were not considered
- why the carbon value of the land was ignored
- why community well-being was not assessed

EN-1 requires the Applicant to demonstrate the project-specific need for this development — why this project, in this location, at this scale, with this land take, in this configuration, and with this level of flexibility. The Applicant has not done this. Instead, I am left with the impression that the Applicant needed the scheme to be here and then worked backwards, using broad policy statements, hedging, and caveats to justify a decision already made.

This Statement of Need doesn't justify anything — it just assumes everything. It assumes the scale, assumes the land take, assumes the 500 MW, and assumes compulsory acquisition, without providing the project-specific evidence EN-1 and EN-3 require.

Obviously, Island Green Power is a business out to make a profit so it can continue doing business. But so is any independent contractor hired to build a garden shed or put a solar panel on our roof — and those tradespeople shouldn't be knocking at our door telling us what we need and putting it where they want to put it, without proper

justification. And we as consumers wouldn't accept a company installing a solar panel that required digging up our entire garden when all we needed was a small panel in the corner.

I am not saying this to be confrontational – even though it may sound that way. I am saying it because the reasoning, as presented, does not make sense to me. It sounds like the Applicant is saying “the UK wants Net Zero — we can give you that,” but they are not giving us enough clear specifics of why it has to be so big, why they cannot tell us how big some components might be, or why it has to be here rather than closer to the actual power station.

The solar array is spread across five land parcels within roughly a four-to-five-mile radius, and the cable corridor runs for around fourteen miles to Melksham. I genuinely do not understand why some of the panels or batteries could not be placed along that route, or nearer the substation itself. Their reasoning is not set out.

If we were having work done on our home, we would expect a clear explanation of what it will look like and why certain design decisions were made. I do not feel the Applicant has provided that clarity.

As a country, we are effectively the “customer” for this infrastructure. Why are we not asking multiple companies to present coordinated proposals for our national energy future, rather than assessing one venture-capital-backed scheme at a time? We need wind, solar, geothermal, and yes, even some fossil-fuel-based industry to produce the steel and components required for the transition. But we also need to focus on industries and supply chains that can be developed here in the UK. Self-reliance is more important than dependence on imports, and that principle should apply all the way down the chain. If we rely on foreign-made components, we are still relying on foreign energy systems. That is not true Net Zero – it is simply exporting our carbon footprint.

Instead of explaining why this 500MW scheme must be built here, in this form, on this land, Applicant's Statement of Need simply repeats that “energy is needed” and treats that as permission. That is not compliance with EN-1 or EN-3 — it is a substitution of policy slogans for actual justification.

This Applicant's Statement of Need skips the evidence and jumps straight to the conclusions. It assumes the scale, the land, and the 500 MW — instead of proving any of them.

Note on assistance: In preparing this document, I used Microsoft Copilot to help me understand complex terminology, policy references, and technical passages in the Applicant's documents by explaining them in simpler, clearer language. Copilot also helped me interpret sections of EN-1, EN-3, and the Planning Act where the meaning was difficult to follow, and assisted me in organising my thoughts, structuring my comments, and improving clarity of expression. All substantive points, concerns, and conclusions are entirely my own.



# Environmental Statement Critique

## Comments on Applicant's Environmental Statement

This document provides comments on the Applicant's Environmental Statement (ES) submitted at Deadline 1. It identifies significant gaps, uncertainties, and reliance on assumptions rather than a defined project. Across multiple chapters, the ES does not assess a fixed Scheme, relies on mitigation that is not secured, and defers essential design detail to the post-consent stage. As a result, the ES does not provide a reliable basis for understanding the real environmental impacts of the proposed development.

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### 1. The ES Does Not Assess a Fixed Scheme

The ES is built on a Scheme that is not yet finalised. Chapter 3 confirms that the detailed design will be informed by **post-consent work**, meaning the Applicant has not provided the actual project for examination. Key elements — including the number and location of Conversion Units, the alignment of the Grid Connection and Interconnecting Cables, and the placement of infrastructure within the Cable Route Corridor — will only be determined at the detailed design stage. This level of uncertainty is unusual for a solar NSIP and undermines the validity of the ES.

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### 2. Uncertainty Cascades Through All Technical Chapters

Because Chapter 3 defines the design parameters used by all technical assessments, uncertainty here affects every dependent chapter. Noise, Air Quality, Transport, Landscape, Hydrology, and Human Health assessments all rely on inputs that are not fixed. The ES therefore assesses a **hypothetical worst-case scenario**, not the actual Scheme that would be built. This prevents the Examining Authority from understanding the real impacts and from determining whether impacts have been minimised.

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### 3. Human Health (Chapter 18) – Conclusions Built on Uncertain Inputs

The Human Health chapter presents itself as a standalone assessment, but it is structurally dependent on the outputs of other ES chapters. The Applicant explicitly states that Human Health must be read in conjunction with Noise, Air Quality, Transport, Landscape, and other technical chapters. However, those chapters rely on **unfixed design parameters** and **post-consent mitigation**, meaning the Human Health conclusions are based on assumptions rather than evidence.

#### Key Issues

- The chapter relies on the **Outline CEMP** and **Outline LEMP**, both of which will be replaced by detailed versions **after the DCO is granted**.
- Dust, noise, construction traffic, PRoW management, and community disturbance are all managed through **future plans**, not secured mitigation.
- The 22 km cable corridor — with multi-year construction impacts — is not assessed in terms of stress, anxiety, disruption, or effects on vulnerable populations.

- BESS fire risk, toxic plume scenarios, and emergency response capacity are **not assessed**.
- Cumulative health impacts from multiple NSIPs in the region are not addressed.

### **Why This Matters**

Because the underlying technical chapters are uncertain, the Human Health chapter cannot demonstrate:

- the true extent of health impacts
- whether vulnerable groups are affected
- whether construction disturbance is acceptable
- whether mitigation will be effective
- whether the Applicant has minimised harm

The chapter concludes “no significant effects,” but these conclusions are built on **unfixed inputs, future mitigation, and assumptions**, not evidence.

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### **4. Mitigation Is Not Secured**

The ES relies heavily on mitigation that is not yet defined or secured. The Outline CEMP and Outline LEMP both state that detailed versions will be produced **only after the DCO is granted**. Construction traffic management, dust control, noise mitigation, PRoW management, and ecological measures are all deferred to future documents. This means the ES conclusions depend on mitigation that does not yet exist and cannot be enforced at DCO stage.

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### **5. Key Chapters Depend on Post-Consent Documents**

Several ES chapters rely on management plans that will only be prepared post-consent. For example:

- **Human Health** depends on the future detailed CEMP and LEMP for dust, noise, and construction management.
- **Transport** depends on a future Construction Traffic Management Plan.
- **Landscape and Ecology** depend on a future detailed LEMP and planting plans.

This approach is inconsistent with the requirement for a sufficiently defined project at DCO stage.

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### **6. Alternatives and Design Evolution Remain Unsettled**

Chapter 4 confirms that the design continues to evolve. The Cable Route Corridor alignment remains subject to refinement, and construction compounds and Highways Improvement Areas have been moved or added during the process. This indicates that the Applicant has not finalised the Scheme and that the ES does not reflect a stable design.

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## **7. Consequences for the Examination**

Because the ES does not assess a fixed Scheme, the Examining Authority cannot:

- understand the real environmental impacts
- determine whether impacts have been minimised
- rely on the Applicant's conclusions
- assess whether mitigation is adequate or secured
- determine whether the land sought for compulsory acquisition is necessary

The ES therefore does not meet the standard required under the EIA Regulations or the expectations for a Nationally Significant Infrastructure Project.

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## **Conclusion**

The Environmental Statement submitted at Deadline 1 is incomplete and unreliable. It assesses a Scheme that is not yet defined, relies on mitigation that is not secured, and defers essential design detail to the post-consent stage. As a result, the ES does not provide a sound basis for decision-making, nor does it justify the environmental impacts or the land sought for compulsory acquisition.

In closing, I wish to emphasise that sprawling industrial-scale solar farms of this kind are not only environmentally disruptive but also detrimental to the wellbeing of rural residents and the cohesion of the communities who live among these landscapes. We cannot sacrifice our nation's countryside, food-producing land, and rural character in a blinkered race toward Net Zero. A sustainable future requires more than glass-covered fields; it requires investment in true home-grown industries, where components are manufactured here, skills are developed here, and long-term jobs are created here. Relying on foreign-made components while covering agricultural landscapes is not a wise or resilient way forward. Britain needs an energy strategy that strengthens self-reliance, supports domestic industry, and protects the landscapes and communities that sustain us.

## **Note on AI Assistance**

Microsoft Copilot was used to assist in reviewing the Applicant's Deadline 1 documents, extracting relevant text, and helping to structure and articulate the Environmental Statement Critique. All judgments, conclusions, and submission decisions are my own. Copilot did not generate any new evidence; it supported the organisation and presentation of material already contained within the Applicant's submissions.

# Evidence of Post Consent Deferral

## Evidence of Post-Consent Deferral in the Applicant's ES

The Applicant's Environmental Statement (ES) contains extensive evidence that essential elements of the Scheme design, mitigation, and assessment inputs will only be finalised **after the DCO is granted**. This level of post-consent deferral is unusual for a solar NSIP and prevents the ES from assessing a fixed project. The following examples are taken directly from the Applicant's Deadline 1 submissions.

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### 1. Chapter 3 – The Scheme (EN010168-000590)

#### Integrated Analysis

Chapter 3 contains some of the clearest admissions anywhere in the ES that the Scheme is **not fixed**, and that essential design detail will only be finalised **post-consent**. Because Chapter 3 defines the parameters used by all technical chapters, uncertainty here cascades into uncertainty across the entire ES.

#### Key Deferral Evidence

- The Applicant states that the detailed design will be informed by “**post-consent work**”, confirming that the final Scheme is not available at DCO stage.
- The exact number and location of Conversion Units will be confirmed only at the detailed design stage.
- The **final locations** of infrastructure such as fibre chambers and other components “**will be determined at detailed design.**”
- The **exact alignment of the Grid Connection and Interconnecting Cables** within the 50–665 m Cable Route Corridor “**will be determined at the detailed design stage.**”

#### Why This Matters

These are fundamental elements of the Scheme. Their deferral means:

- Noise, Air Quality, Transport, Landscape, Hydrology, and Human Health assessments are based on **assumptions**, not fixed inputs.
- The ES cannot assess the **actual project**.
- The Applicant cannot demonstrate that impacts have been minimised.
- Compulsory acquisition cannot be justified because the land take is based on a **non-finalised design**.

Chapter 3 therefore undermines the reliability of the entire ES.

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### 2. Chapter 4 – Alternatives and Design Evolution (EN010168-000591)

While Chapter 4 does not use the exact phrase “if the DCO is granted,” it repeatedly confirms that the design is still evolving:

- The design “has evolved iteratively” and continues to be refined.
- The Cable Route Corridor alignment remains subject to further refinement.

- Construction compounds and Highways Improvement Areas have been moved or added, indicating that the layout is not final.

This demonstrates that key design choices remain unsettled.

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## **Chapter 18 – Human Health (EN010168-000605)**

The Human Health chapter relies on mitigation and management plans that are **not yet written**:

- It depends on the Outline CEMP and Outline LEMP, both of which will be replaced by detailed versions **only after the DCO is granted**.
- Public health-related mitigation (e.g., construction management, PRoW management, dust control, noise controls) is deferred to future documents.

This means the Human Health conclusions are based on assumptions, not secured measures.

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### **4. Outline CEMP (Deadline 1)**

The CEMP repeatedly defers essential mitigation:

- “A detailed CEMP will be produced prior to construction.”
- The Construction Traffic Management Plan will be prepared following the grant of the DCO.
- Contractor-specific mitigation will be developed **post-consent**.

Construction impacts are therefore not assessed against fixed, enforceable mitigation.

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### **5. Outline LEMP (Deadline 1)**

The LEMP contains explicit post-consent deferral:

- “Should the DCO be granted, a detailed LEMP will be produced prior to the start of construction.”
- Final planting plans and habitat creation measures will be confirmed **post-consent**.

Landscape and ecological mitigation is therefore not secured.

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## **Conclusion**

Across multiple Deadline 1 documents, the Applicant defers essential design detail, mitigation, and assessment inputs to the **post-consent** stage. This prevents the ES from assessing a fixed Scheme, undermines the reliability of the technical chapters, and affects the justification for compulsory acquisition. The evidence above demonstrates that the Application does not meet the requirement for a sufficiently defined project at DCO stage.