

Re letter - Ref: EN010169, Date: 23 July 2026

Annex C - Initial assessment of principal issues

I submit that the carbon budget for the application, which is not currently listed in Annex C, should be made a principal issue.

My concern is that the applicant has not provided a substantial carbon budget for the scheme.

The entire purpose of the proposal is to reduce CO2 emissions, but the applicant has not demonstrated that this will be the case.

The CO2 costing figures they have provided are either not credible, are misleading, or are estimates.

(I have raised this concern in my main submission, but its positioning as a principal issue in the procedure is a separate matter.)

The applicant claims: "any emissions relating to the construction of the Scheme will be offset after four years of operation." (APP-070 - Volume 6 Environmental Statement 6.1 Environmental Statement Non-Technical Summary)

This statement may be strictly true, but it is quite misleading.

What interested parties actually need to know is not just the payback period for construction, but for the whole lifecycle of the scheme, including maintenance and decommissioning.

The four year payback claim refers only to the CO2 costs of the construction phase and excludes the replacement costs of the solar panels (1 replacement) and BESS (3 replacements).

But these replacements incur the majority of the estimated costs over the whole project (662,054 of 1,112,445 tCO2e).

If the replacement costs are included in the calculation, the carbon payback period jumps to over 10 years.

The BESS capacities are not defined and their costs have been arrived at "qualitatively", so they are estimates.

These items incur the greatest CO2 cost, but there is no explanation of how their estimates are arrived at.

This seems wholly inadequate.

The solar panel CO2 costs they have provided appear to be quite unrealistic, falling (far) below even an idealised western supply chain.

If realistic costs for equipment sourced from East Asia are used, it appears possible that the scheme may never actually reach carbon neutrality.

It could be a net emitter of CO2 throughout its entire projected lifespan, essentially making it "not fit for purpose".

The absence of a proper costing is currently a fatal flaw in the application which undermines its very purpose.

Unless it can be demonstrated that this scheme will indeed save significant CO2 emissions then there is no argument in its favour.

So, I believe that this concern is of paramount importance and should be a principal issue.

I would be prepared to speak on this matter at one of the events if that would be helpful.