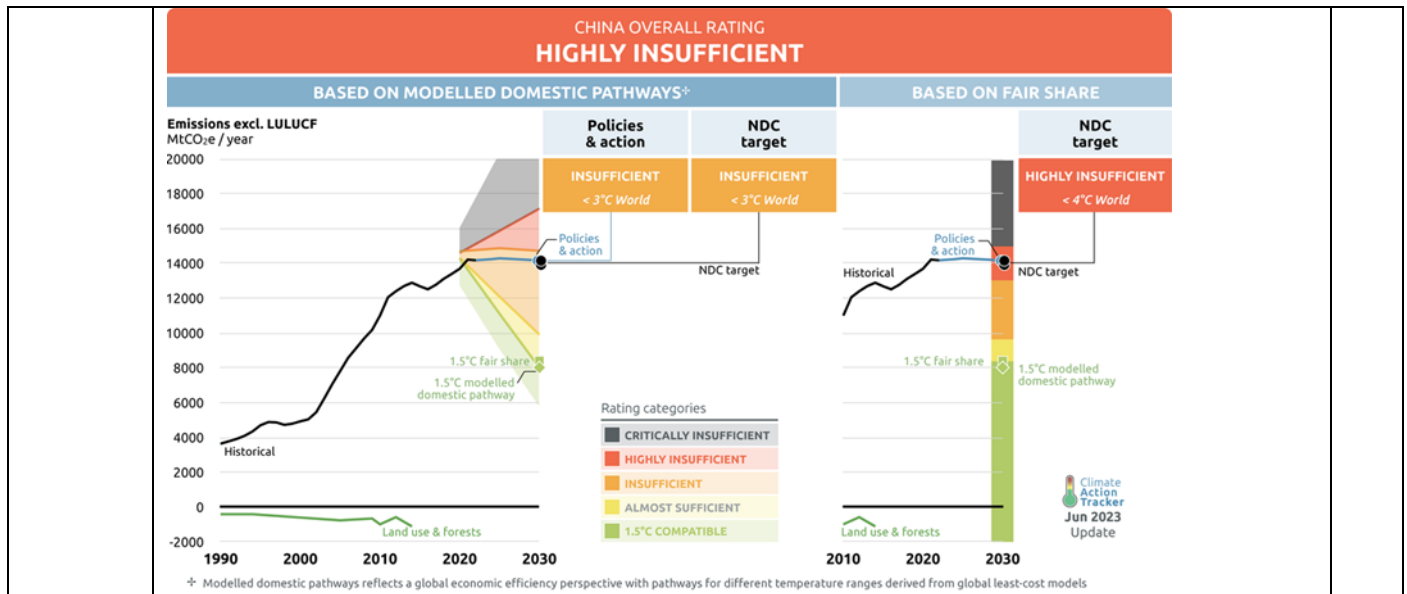


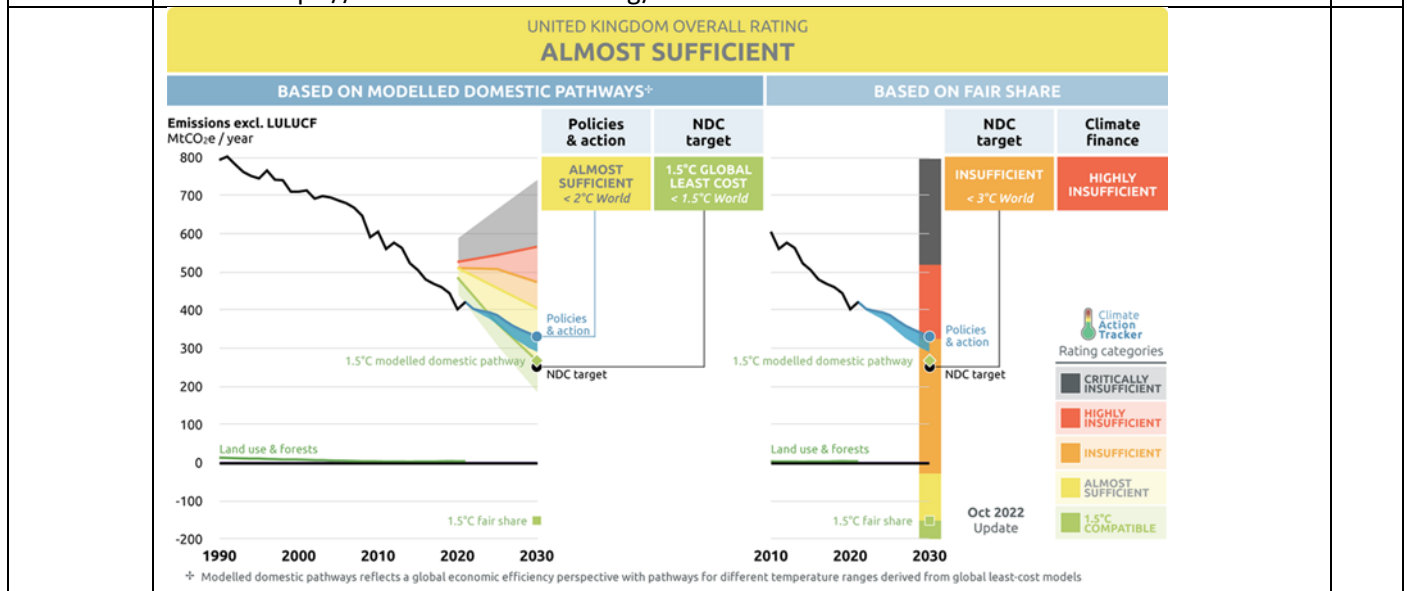
It was interesting to note that the Planning Inspectorate has maintained its 99% approval rate by recommending the Longfield Solar site for DCO approval.

**Comments on Responses to ExA’s First Written Questions**

EXQ No.	Comment on Applicant’s Response	
Q.1.0.9	<p>The applicant is repeating in summary form statements it has already made in its earlier documents and fails to address the question. The applicant that it has achieved “Good Design” whereas the overwhelming response from the community shows that it has not.</p> <p>With regard to mental health, it is quite obvious that the sound of (multiple) piledrivers operating 12 hours a day, six days a week will have a significant effect on mental health of most of the community.</p> <p>Sound torture is a recognized technique now banned by the UN. Victims of torture have their sense overloaded by being subjected to intense or <b>continuous</b> light or noise – duration and volume are critical variables, so it doesn’t need to be tremendously loud if it is regular and continuous to be a form of torture.</p>	
Q1.0.10	<p>The applicant’s response is inadequate. Given their development experience claims they should be able to produce an indicative gantt/construction program showing sufficient details of planned durations for each activity. Canadian Solar are “vertically integrated” insofar as they produce, plan, install and operate solar installations. They may not know when they’re going to start but they should be able to tell us how long it will take as and when they do.</p>	
Q1.10.18	<p>The applicants response appears to be inconsistent with the Land Use &amp; Soils document where they state that 239Ha of the land within the order limits will be continue to be farmed unencumbered by PV infrastructure/arrays (12.3.6) – why do they need compulsory purchase powers over this land? It clearly isn’t needed for solar so there can’t be an overwhelming case in the public interest.</p> <p>The applicant suggests it needs to do more detailed analysis on the design/wait for technology to appear/better understand ground conditions – which suggests they haven’t done enough work to make a firm decision. Clearly the applicant is trying to keep the parameters of the DCO as wide and loose as possible in order to have the maximum flexibility to do whatever they want.</p> <p>This is totally unacceptable – the ExA/SoS is going to issue a DCO which will ruin an entire community. The least the ExA can do is ensure that the area which the applicant is able ruin is contained to the absolute minimum.</p>	
Q1.2.6	<p>The UK is further ahead in its progress towards achieving its Net Zero commitment than any other developed nation. It produces 1% of global carbon emissions (although it does produce a high Kg/capita figure), it is not significant and so whatever the UK does will not save the world. Climateaction tracker suggests the UK is broadly on track at a domestic level but needs to do more on a “fair share” basis (see attached along with the chart for China).</p> <p>My earlier written representation contained an analysis of the REPD data. The applicant doesn’t state the date of the dataset they are using nor do they acknowledge its shortcomings. It is not possible to confirm whether they have not accounted for the 8GW of non NSIP projects that have received a planning consent but not YET progressed to construction, but it looks to me like there is a degree of “statistical licence” being used by the applicant in its favour.</p>	



Source: <https://climateactiontracker.org/countries>



Q4.0.1 The interested parties for plot no. 01-01 and all associated plots is incorrect.

The applicants comments on negotiations are incorrect.

Q4.0.5 The applicant has not considered reasonable alternatives to compulsory acquisition. It is clearly using the threat of compulsory acquisition to extract better commercial terms for itself. More details on this point will follow at the appropriate hearing.

Q4.0.6 The applicant repeatedly points to Canadian Solar Inc with regard to funding, however the ExA should be aware that there is no form of corporate guarantee/covenant support being offered with regard to the applicants ongoing obligations.

The financial statements of Canadian Solar are of mild interest, but the ExA should be assessing the scheme on the basis of the applicant’s own covenant strength as ultimately that is the only entity to which any third (or injured) party will have recourse.

Q4.08 The applicant is seeking lease terms which include a rolling break clause for its benefit, yet it is asking for the power to compulsorily acquire the very same land. So it is asking for certainty from the ExA through CA powers but is only willing to contract itself on the very shortest term basis.

Written Submission.

Richard Williams – interested party No. MPSP-012

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Q4.0.10	<p>I think you can read a bit too much in to the significance of Biodiversity Net Gain. According to Natural England’s Biodiversity Metric 4.0 Calculation Tool.xlsm if the agricultural land under consideration were to be changed from its current “Cropland – cereal crops” status to “<b>Urban – Vacant or Derelict land</b>” the biodiversity would improve by 100%.</p>	
Q4.0.11	<p>The applicant has had the opportunity to acquire 255 acres of land in a single block adjacent to Braceborough, on the edge of the order limits. As far as I know it has not done so, but if it has then it does not need all of the land within the order limits.</p> <p>The ExA will be reminded of this in due course but in the mean time the applicant should explain why it did not seize the opportunity to acquire that land.</p>	

End.