

Planning Objection Submission: East Park Energy Solar Development

1. Introduction

I object to the proposed East Park Energy Solar Farm ("EPE").

While I recognise the need for renewable energy, the Planning Act 2008 requires that applications are determined in accordance with the relevant NPS, unless adverse impacts outweigh the benefits. This proposal gives rise to significant and demonstrable harm which conflicts with key provisions of the National Policy Statements for Energy (EN-1) and Renewable Energy Infrastructure (EN-3).

2. Loss of BMV Agricultural Land

The proposal would result in the extensive use of BMV agricultural land. This is a matter of significant concern and is directly addressed in national policy. 74% of the proposed land is BMV, 2.5 times the average for U.K. solar developments (and due to poor sampling and the inclusion of buildings and roads in their calculations this may be an underestimate). EN-1 emphasises the need to consider land use impacts carefully. Paragraph 5.10.8 states that applicants should seek to minimise impacts on the best and most versatile agricultural land and prefer poorer quality land where possible.

Similarly, EN-3 requires solar developments to be sited on previously developed, contaminated, or lower-quality land wherever possible, and that the use of BMV land should be avoided unless justified.

The applicant has failed to demonstrate compliance with these requirements. There is insufficient evidence that a sequential site selection approach was applied to prioritise lower-quality land. EPE has confirmed they the entity they bought had just looked for land near the Eaton Socon connector. That is not an approach consistent with the avoidance of using BMV land.

The scale of the scheme means that the loss of BMV land is not incidental but substantial. Although described as temporary, a lifespan of up to 40 years represents a quasi-permanent loss of productive agricultural capacity. As discussed below, their remediation plans are woefully vague, completely inadequate and entirely unfunded.

The suggestion that the land can continue in agricultural use through grazing does not adequately reflect the constraints imposed by solar infrastructure. EN-3 recognises that while dual use may be possible, it does not negate the loss of agricultural flexibility and productivity.

This has direct implications for food security, an issue of growing national importance. EN-1 acknowledges the need to consider efficient land use and competing land uses. The long-term diversion of high-quality farmland to energy generation undermines the resilience of domestic food production. U.K. food production is in decline, with imports (and the associated emissions) rising alongside prices.

There are also concerns regarding soil health and restoration, addressed in EN-1 paragraph 5.10.11. This requires consideration of soil quality, including the potential for degradation and the ability to restore land following decommissioning. The application does not provide sufficient evidence that soil structure and fertility can be fully restored after decades of compression and use.

In addition, EN-1 requires that decision-makers consider cumulative land use impacts. The increasing number of solar developments across the local area raises serious concerns about the gradual erosion of the agricultural land base. Taken together, the proposal is in clear conflict with both EN-1 and EN-3 policy objectives regarding the protection of high-quality agricultural land.

3. Impact on Biodiversity and Ecology

The proposal raises significant concerns in relation to biodiversity, which are addressed in EN-1 Section 5.4.

EN-1 requires that developments should avoid significant harm to biodiversity and, where possible, secure net gains.

However, it also recognises the importance of avoiding habitat fragmentation and long-term ecological degradation.

Given the scale of the EPE scheme, the risk of habitat loss, fragmentation, and disturbance is substantial. While mitigation and biodiversity net gain are proposed, there is considerable uncertainty regarding their effectiveness over the lifetime of the project. The impact of the construction disruption on local wildlife will be devastating. Hares, badgers and deer will not be able to get through the miles of fencing post construction.

The cumulative impact of multiple solar developments is also relevant, as EN-1 requires decision-makers to consider the combined effects of development on ecological networks.

4. Construction Impacts: Traffic, Noise, and Disruption

Construction impacts are addressed in EN-1 Section 5.14 (Traffic and Transport) and Section 5.11 (Noise and Vibration).

The scale of construction activity required for this development would result in a significant increase in heavy goods vehicle movements on rural roads, leading to congestion, noise, and safety concerns. I believe the applicant has ENORMOUSLY underestimated the vehicle movements involved across the lifespan of the project, as other submissions will set out.

EN-1 requires that such impacts are minimised and mitigated. However, given the rural nature of the road network, it is unlikely that these impacts can be adequately addressed. There will be congestion, disruption, road damage and inevitably accidents and deaths.

5. Carbon Footprint and Lifecycle Considerations

While the scheme contributes to renewable energy generation, EN-1 emphasises the importance of considering the whole lifecycle impacts of development.

The embedded carbon associated with manufacturing solar panels, particularly where produced overseas using fossil fuel-based energy, is significant. Transport emissions further add to this impact. We believe the emissions identified in the application are HUGELY underestimated, as other submissions will set out.

These factors reduce the net carbon benefit of the proposal and should be taken into account in the overall planning balance.

6. Decommissioning and Long-Term Restoration

EN-1 highlights the importance of considering the long-term effects of infrastructure, including decommissioning. The application lacks sufficient detail regarding how decommissioning will be funded and enforced. No one knows what entity will be in place to conduct decommissioning, and there has been no funding whatsoever allocated to this. Counsel for the developers has said "the land owner at the time will probably want to clear it up". This speaks to a lack of clear intent to remediate and without a clear calculation of the costs, and an allocation of funds to meet them, we can have zero confidence that this obligation will - or can - be met. Without robust, legally binding mechanisms, there is a very real risk that restoration may not be fully achieved. This is particularly concerning given the potential for long-term soil degradation and landscape change.

7. Landscape Impact and Visual Amenity

Landscape and visual impacts are addressed in EN-1 Section 5.10.

The EPE scheme would introduce an industrial development the size of Gatwick into a rural landscape, with significant adverse effects on visual amenity and landscape character.

EN-1 requires that such impacts are minimised and that development is sympathetic to its surroundings. Given the scale of the proposal, this requirement is not met.

8. Impact on Heritage Assets

EN-1 Section 5.9 requires that great weight be given to the conservation of heritage assets.

The proposal will to harm the setting of Grade 1 and 2* heritage assets through visual intrusion and landscape change, all the more so given the proximity of the scheme to those assets. Such harm must be clearly justified and outweighed by public benefits, which has not been demonstrated.

9. Impact on Public Rights of Way and Amenity

The impact on amenity is addressed in EN-1 through its consideration of landscape, recreation, and quality of life.

While rights of way may remain open, their character would be fundamentally and permanently altered. This represents a generational loss of amenity value which should be given weight in decision-making.

10. Socio-Economic and Wellbeing Impacts

EN-1 recognises the importance of considering impacts on local communities, including quality of life.

The scale of the development would result in significant changes to the local environment, potentially affecting property values, community cohesion, and mental wellbeing. The stress suffered by local residents over recent years has been material, and that is before the construction and the loss of amenity referred to above.

11. Consideration of Alternatives

EN-3 emphasises the importance of site selection and the use of suitable land.

The applicant has not demonstrated that brownfield or lower-quality land has been prioritised, nor that alternative approaches have been fully explored.

12. Cumulative Impact

EN-1 requires that cumulative impacts are fully considered.

The proliferation of large-scale solar developments in the region raises serious concerns about the combined effects on landscape, agriculture, and biodiversity. We also have the Black Cat development and the Tempsford new town. It feels like Bedfordshire is being punitively targeted by the Government.

13. Conclusion

The Planning Act 2008 requires that applications are determined in accordance with the National Policy Statements unless the adverse impacts outweigh the benefits.

In this case, the proposal gives rise to substantial harm, including:

- Loss of Best and Most Versatile agricultural land
- Adverse impacts on biodiversity and ecological networks
- Significant landscape and visual harm
- Impacts on heritage assets and rural amenity
- Long-term uncertainty regarding land restoration

These harms are contrary to key provisions of EN-1 and EN-3 and clearly outweigh the benefits of the scheme.

For these reasons, I respectfully request that development consent be refused.

Yours faithfully,
Richard Finston