

Further to the Preliminary Open Floor Hearing Meeting 17th March (and the Issue Specific Meeting 18th March) I am Simon Beverly, a resident from Keysoe and I submit my written representations as follows...

1. Since the Secretary of State's decision on the Mallard Pass project the Government (and the Secretary of State) have specifically legislated in the GB Energy Act for "measures ensuring that slavery and human trafficking is not taking place in its business or supply chains". This is now the law, it should apply equally to a small enterprise as to a large one. It is therefore incumbent on the applicants and the inspector to ascertain there is no forced labour within the supply chain. There is no justification for scoping-out such proof or requirement now the new law exists. No such precedent can be assumed from that Mallard Pass enquiry which preceded the introduction of the GB Energy Act. Would the Examining Authority please therefore ensure this matter is not scoped-out?
2. Could the Examining Authority particularly drill down into the realities of the full life cycle of the 2 main component parts of this proposal...The Photo-voltaic panels and the Lithium-ion batteries? The solar panels themselves are likely to need replacing after 20 years whilst the lithium-ion batteries have a lifespan between 5 and 13 years. So, all the PV panels are likely to be replaced once and the batteries perhaps 2, 3 or even 4 times during the 'temporary permission' of 40 years. There is therefore a minimum doubling of the minerals and materials used in these items. Such issues directly and negatively affect the greenhouse gas calculations the applicant applied to this project. Additionally It is worth noting the existing 25 year 'temporary permission' for the Pertenhall solar farm was extended to 40 years just a decade after it commenced production and the NPPF encourages extensions to such so-called "temporary" periods. Both the proposed PV panels and the batteries have limited proven economic recycling methods, it is simply cheaper to produce new units. The Examining Authority should therefore seek evidence from East Park Energy they have a proven economic method to recycle components and that none of them ends up in landfill or, worse still, they are re-exported to become a third country's/party's dirty problem.
3. Would the Examining Authority stress test the abilities of the proposal to generate and supply clean electricity in a meaningful (and by meaningful I intend to compare the vast loss of food producing good agricultural land to the very poor and frequently negligible solar returns)...hence, supply electricity in a meaningful and secure fashion at desirable times, bearing in mind the UK is one of the least appropriate countries for solar generation? In particular noting the typical average UK output of solar farms is only 10% of their headline capacity. For several months each year there will be no spare capacity from the panels to charge the BESS batteries. The reality is the solar panels are something of a "fig leaf" for the BESS which is likely to become the main 'fee earner'. The BESS will simply be buying in cheap off peak electricity and selling it back at higher prices. A significant percentage of that stored electricity will have been gas generated.