East Park Energy Development Consent Order (EN010141)

Open Floor Hearing, 17 March 2026 – Oral representation / Issue Specific Hearing 2, 18 March 2026, The use of Best and Most Versatile land – comments during hearing in response to the Applicant

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Open Floor Hearing

Good afternoon.

In considering a development of East Park Energy's scale, it is essential to examine not just the headline installed capacity, but how the infrastructure would actually operate within the electricity system.

The proposal is presented as a major 400-megawatt solar generating station combined with a 100-megawatt battery energy storage system.

But when actual solar performance is scrutinised, a very different picture emerges.

Modelling using regional insolation data for 2024 shows that a solar installation of this size would produce around 39 megawatts on average (see Figure 1a[*]).

Even in 2025 – the sunniest year on record – average output would be 44 megawatts (see Figure 2a).

In practical terms, this means that a scheme promoted as a 400-megawatt project would deliver roughly one-tenth of that figure on average.

Seasonality is also significant.

In the UK climate, solar peaks in summer and falls to very low levels during winter, precisely when electricity demand is highest – particularly during evenings when generation is minimal or entirely absent.

National Policy Statement EN-1 emphasises that the energy system must remain secure, reliable and able to meet electricity demand.

In that context, the dependable winter contribution of this solar installation would be very limited.

It is also important to understand the true operational role of the 100-megawatt battery system.

The battery bank would have both import and export capability, meaning it can charge directly from the grid as well as export electricity to it.

Battery systems of this type are not simply passive storage units.

They are typically developed as grid trading assets, importing electricity when prices are low and exporting it when prices are higher, while also contracted to provide balancing services. This market activity is the primary commercial driver for battery storage.

During summer months the battery would store any excess produced by the solar array.

But for five to six months of the year (see Figures 1b and 2b), regional insolation data indicates that East Park's on-site solar generation would be far more limited, suggesting the battery would largely charge using electricity imported from the grid.

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[*] Hearing format did not allow for presenting visual material from the floor. Figures 1a, 1b, 2a and 2b are therefore presented now via this written follow-up, requested by the Examining Authority.

Electricity drawn from the grid is not necessarily renewable.

The UK system still relies significantly on gas-fired power stations, meaning that East Park Energy's battery banks could at times store gas-generated electricity and later export it back. It would be operating primarily as a grid trading and balancing asset, not as storage for on-site solar.

This distinction matters because battery storage does not resolve the fundamental seasonal mismatch between solar generation and winter electricity demand. Storage is for a matter of single-digit hours, not months.

When considered from a system perspective, the proposal therefore effectively consists of two pieces of infrastructure:

- a very large solar installation whose generation is highly seasonal and limited during winter demand peaks, and
- a grid-connected battery trading facility that can operate independently of the solar array.

National Policy Statement EN-3 recognises that large solar power stations require extensive land and must therefore be carefully assessed in terms of siting, land use impacts and their role in the electricity system.

Given the seasonal generation profile, limited winter output, and operational independence of the battery storage, it is critical that the Examination looks beyond the nameplate capacity and considers the project's real contribution to the system.

In effect, the most economically active – and commercially valuable – element of the project promoted by Brockwell Storage and Solar is likely to be the storage trading infrastructure, while the solar installation is largely in the background for extended periods of the year.

This raises questions under EN-1 and EN-3: whether a development requiring such vast agricultural land-take represents the most effective and appropriate contribution to the electricity system, when assessed in terms of actual generation patterns, system needs, and security of supply.

In that context, it is important that the Examination considers:

- the solar installation's seasonal performance
- its dependable winter contribution
- the role of the battery bank as an independent grid trading asset, and
- the overall balance between system benefit and the extensive land use required.

It would therefore be helpful for the Examination to understand:

- to what extent the storage system would participate in wholesale electricity markets, including arbitrage and grid balancing services, independently of the solar generation
- what proportion of the battery energy is expected to come directly from the solar installation during autumn and winter, when on-site generation drops, and
- how much energy imported from the grid would include electricity generated by gas-fired power stations.

Thank you.

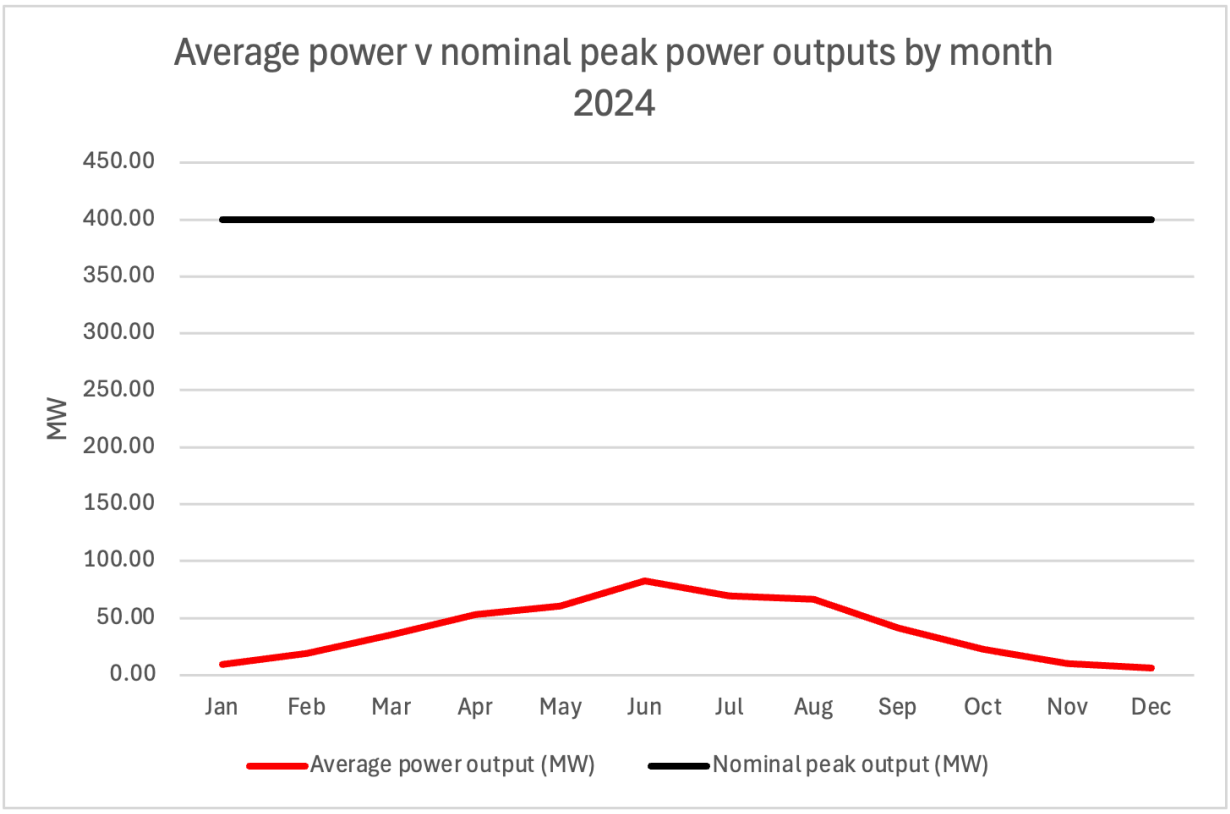

Figure 1a: 400MW capacity solar power facility showing actual output based on regional insolation data for 2024

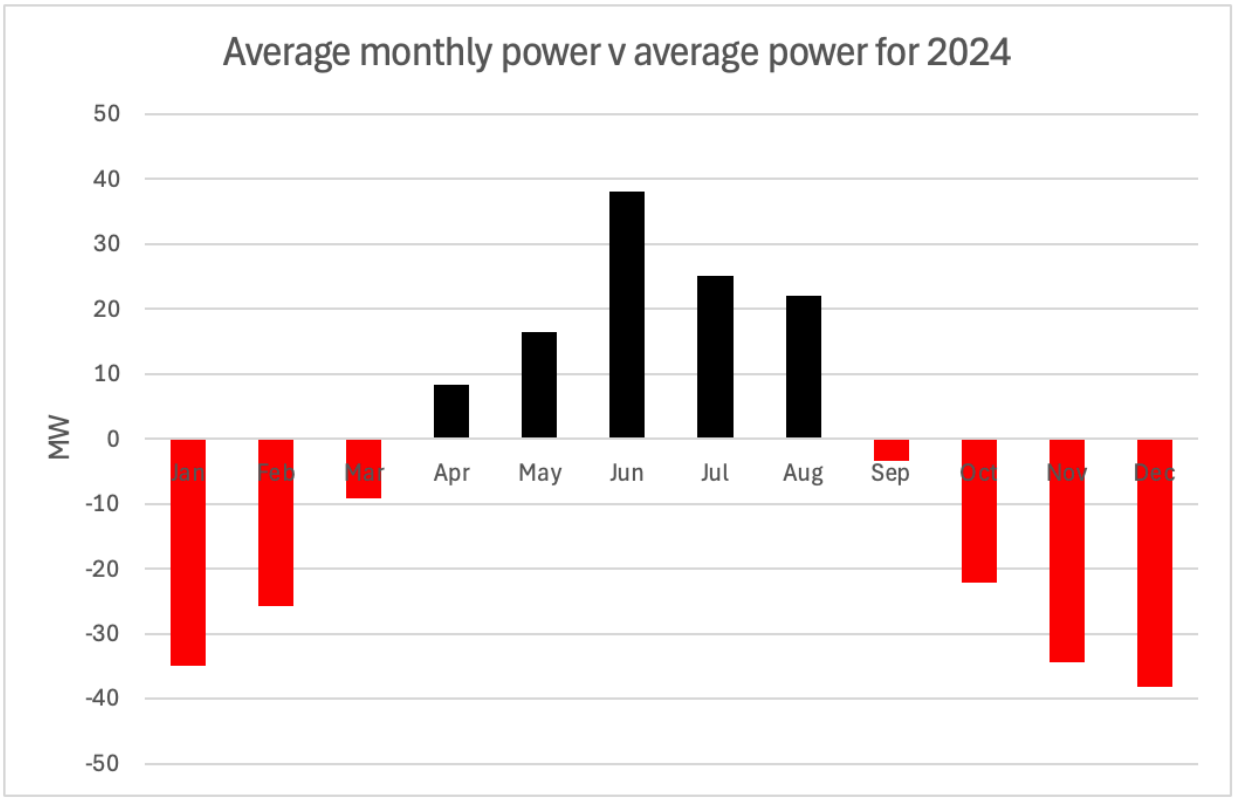

Figure 1b: 400MW capacity solar power facility showing actual output based on regional insolation data for 2024, average monthly power v average power across the year (39MW)

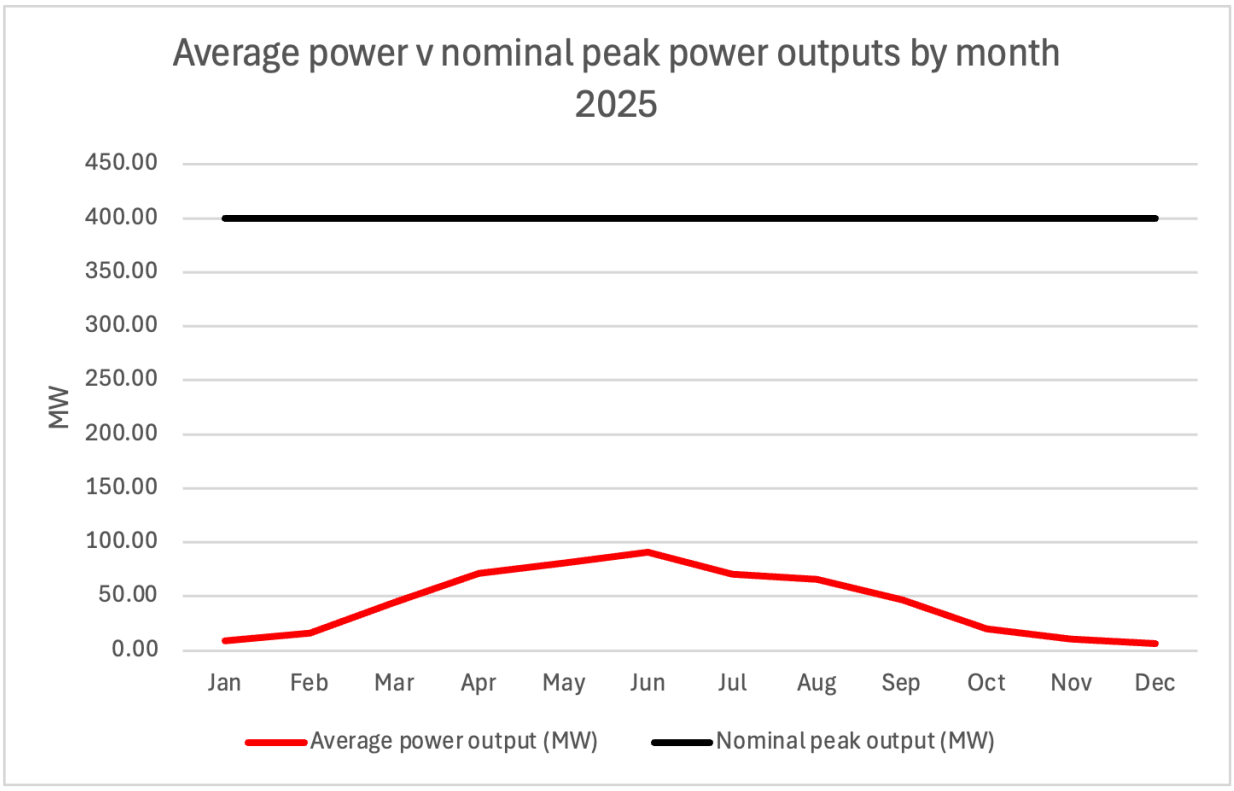

Figure 2a: 400MW capacity solar power facility showing actual output based on regional insolation data for 2025 (the sunniest year on record)

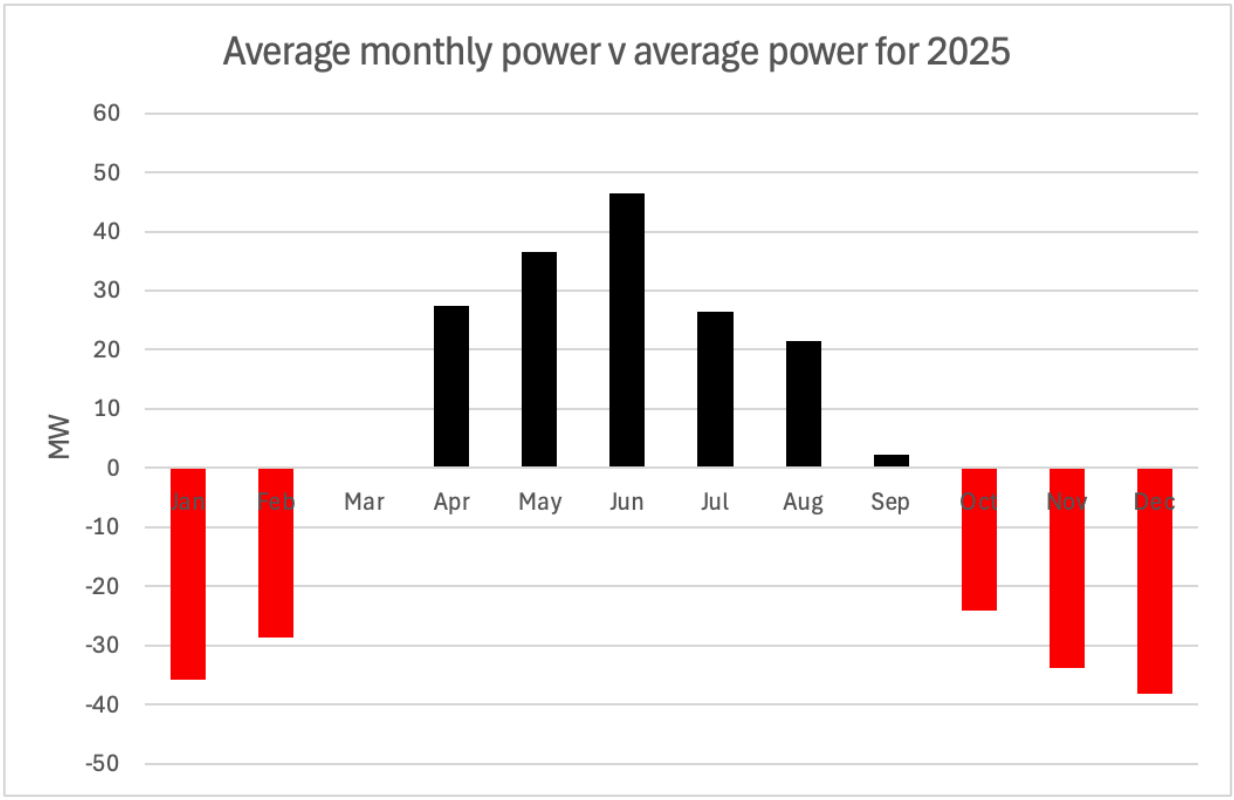

Figure 2b: 400MW capacity solar facility showing actual output based on regional insolation data for 2025, average monthly power v average power across the year (44MW)

Wednesday, 18 March 2026, Issue Specific Hearing 2, Agenda item 3, The use of Best and Most Versatile land

In response to a consultant for the Applicant claiming that the site selection had focused on a 15km radius of the grid connection on the basis of "technical and commercial constraints", I raised the point that at least one other solar NSIP is planned for a further distance than 15km from the grid. I mentioned a specific solar NSIP project, the Lime Down proposal in Wiltshire. **Post hearing note:** following a brief review I can confirm that at least six solar NSIPs are proposed at a distance of around 20km or more from the grid, including Cottam, East Yorkshire, Green Hill, Lime Down, Light Valley and Sunnica. The consultant for the Applicant's claim that the limit of 15km distance from the grid connection was imposed because of a "technical" constraint is evidently not correct.

In response to statements from a consultant for the Applicant in relation to national agricultural land-take for solar infrastructure, I questioned the total land-take he cited. It appears that the consultant was misleadingly quoting a lower, interim target. The government's solar target for 2035 is 75GW, which would equate to around 375,000 acres of land, roughly equivalent to the size of Greater London. I stated that Energy Minister Michael Shanks has conceded that the target will largely be delivered via farmland. This is not insignificant agricultural land-take. **Post hearing note:** most solar NSIP developers are targeting cropland. The government's 2035 target would result in around 2.5% of all UK cropland taken up by solar infrastructure.

I further commented on this point that solar infrastructure proposals are not evenly distributed across agricultural land. Regions such as Kent, Lincolnshire, Norfolk and Yorkshire are disproportionately targeted by ground-mounted solar developers. **Post hearing note:** ground-mounted grid-scale solar developers are targeting BMV farmland and, conversely, avoiding much lower quality land, despite planning guidance to prioritise it. Analysis using the Agricultural Land Classification map overlaid onto NSIP plans in England alone shows that 24% of the farmland selected by applicants for solar development is the top quality Grades 1 and 2, with 66% at Grade 3, a proportion of which will be Grade 3a BMV land.

I also pointed out that clustering is common as we see with the existing and consented solar sites surrounding the East Park Energy's four-site proposal, introducing cumulative impacts across agricultural land. If successful, this Application would result in 2,800 acres of land in a 'solar corridor' (Figure 3).

Figure 3: Graphic shows existing solar sites, consented solar projects and the Application, creating a 'solar corridor' of 2,800 acres. Other solar site plans in the vicinity are not shown