

East Park Energy – Interested reference [REDACTED]

Following on from the open hearings of 17th and 18th March which I attended in person and remotely I would like to make the following comments in support of my objection to the East Park Energy proposed solar development:

It is imperative that the Inspector takes into consideration the other NSIP's in this area:

Universal Studios

Black Cat Roundabout

East West Rail

Luton Airport

Tempsford New Town

All of these developments will have significant impact on the local area particularly with regard to increased traffic and the East Park Energy scheme will have such a detrimental effect that the area will almost certainly be gridlocked a lot of the time and a high increase in accident risk will result.

I would ask the Inspector to also take note of the other existing and recently approved other solar developments in this area, along with the East Park Energy scheme will result in a 2800 acres corridor of solar plant which will be both disproportionate and overwhelming to the area.

The applicant has failed to prove that they have adequately considered alternatives to the Best and Most Versatile land that this project will be predominately built on. Just using a desk based cursory glance through the brownfields site register does not prove that this application provides for the least harmful option. Government policy NPPF states that areas of poorer quality land should be preferred to those of higher quality land. The developer has failed to show any serious attempts to identify alternative sites based on non BMV land. The developer should be asked to give this proper consideration before this application can be considered.

The loss of BMV farmland under this scheme will result in a significant loss of crop production. Solar can be built on many different sites but crops can only be grown on land.

The applicant has not provided any justification for the "spread" of the four sites, which results in a patchwork of non-continuous parcels of land, which are not only environmentally extensive but operationally inefficient compared to more compact sites. The applicant needs to explain why they have decided on this option and prove that they explored alternative more compact options as well.

The applicant has not carried out sufficient or timely environmental checks. The few checks that they actually undertook were made at a time of very hot dry weather and do not provide indicative data on the true diversity of flora and fauna in the affected area. The checks were carried out in June 2022 meaning that the four year time limit will expire soon, but even so more checks need to be undertaken.

The applicant response at the hearings shows that they have little if any understanding of the local road network and the impact that this development will have on the local communities and the local roads. These are narrow, winding B and C roads, already known as accident black spots. I frequently encounter "close shaves" with large vehicles crossing over onto the wrong side of the road when navigating the many narrow bends on these roads. The number of large vehicles required for the construction and maintenance of the site will undoubtedly result in accidents potentially fatal. There is doubt that some of the vehicles will actually be able to access the site as they will be too large/heavy to negotiate the bends and use the bridges crossing local rivers. There are limited passing places for two vehicles potentially resulting in congestion and re-routing needs. Although the applicant is proposing to build temporary roads across some of the site for construction, replacement and decommissioning (I do not regard 40 years as temporary) the construction vehicles and manpower transportation will still have to use a considerable amount of the local roads to get to the site and from site to site. The applicant has not provided sufficient assurance that they have fully assessed the vehicular impact of this project or that drivers will be monitored to ensure they are using the temporary roads. Further evidence needs to be provided of the transport assessment, monitoring and enforcement policies.

The solar radiation in this country is too low to justify such a scheme - the UK is rated 229 out of 230 countries in the world. It has been proved that these solar facilities never generate their "maximum potential output" which is based on full summer sun levels for 365 days a year. The reality is that in this country this will never happen. What actual evidence has the applicant supplied to prove that this development will actually deliver what it proposes?

Battery storage is a significant part of this proposal (far greater than the solar output that will be generated) and it raises the question as to whether this development is about providing solar power or whether energy price arbitrage (using none renewable energy sources) is the real motive for this project.

The applicant has not given sufficient evidence that they have fully assessed the major safety risks of the BSS lithium-ion battery asset.

The applicant has failed to allay fears that the development is going to result in a significant increased flood risk and further analysis should be required.

There is increased evidence of serious organised crime gangs targeting solar panels and cabling. The table below has been provided by Opal – Serious Organised Acquisitive Crime national intelligence unit/Metal & Infrastructure Crime. 2025 shows data up to the end of August, with crimes/incidents for remainder of year projected. This will result in increased costs for both security and replacement which the applicant has not factored in to their proposal

The applicant only carried out limited trial pit evidence but even so high archaeological potential was highlighted. The applicant should be required to carry out further trial pit surveys as there are undoubtedly more archaeological sites not yet identified, before approval is considered.

The screening proposed to "hide" the development will be totally ineffective. Small hedge whips will take decades to grow big enough to provide any effective screening and to also replace the lost habitat caused by the construction as has been evidenced in existing solar developments in this and other areas.

I do not believe the developer has provided sufficient detail/evidence of the financial backing of the company and how they are financially able to actually deliver this project. I would ask the Inspector to require further financial information not only in regard to the project build but also to maintenance/replacement and the decommissioning and removal of plant from the site at the end of the project.

During the hearing the applicant seemed imply that further assessments will be carried out post approval rather than

before – this is worrying and I would ask the Inspector to require all additional assessments and evidence be provided before approval.

I thank you for taking the time to read my submission.