

Submission ID: SD030DA74

As requested by the Examining Authority on March 17th I attach the written summary of my Oral submission to the OFH1 making clear my Objections with reference to National Policy Statements.

East Park Energy Development Consent Order EN010141

Written Summary as requested by the Examining Authority following my oral submission, as a registered Interested Party, at the Open Floor Hearing 1 on 17th March 2026 :

As stated in my registration as an IP I object to the proposed construction by Brockwell/East Park Energy, on open Farmland, of a 100 MWh BESS.

The proposed BESS would consist of 96 shipping container sized units housing 100's of 1000's of Li-Ion battery cells, and multiple Inverters.

I ask that the Examining Authority consider and recognise the following two reasons for my objection, with specific reference to National Policy Statements EN1 and EN3 :

1. Firstly I object to the purpose for which this BESS would be used :

The timing of UK Solar generation cannot match demand. The National Load Factor (delivery vs quoted capacity) through 2024/2025 was 9.2% underlining the scarcity of UK sunshine hours. This is a very large BESS that in principle would store patchy Daylight Solar to release it into the Grid later when demand is high – reference to suitability in EN1 3.3.28

Importantly this Project is presented as a NSIP but is not owned or controlled by the Government or by the Communities upon which it could be imposed but by International Investors – requiring a commercial return on their investment.

As evidenced by other Large-Scale Solar on Farmland developments and acknowledged by Developers the Overscaled/Underutilised BESS will be run to actively engage in Supplementary activity importing Non-Solar power from the Grid when prices are cheap and exporting

back to the Grid by choice when prices higher - availing itself of opportunities to engage in For Profit “Arbitrage Trading”.

Again to be clear : for significant periods of its life the BESS may hold little Solar from the EPE site, and the required commercial rate of return comes from the “for profit” exercises, which will likely be run by a potentially unregulated remote trading team for the benefit of the Investors, not clearly for the Community or Public consumer.

The Business Case for projects like East Park Energy does not align with Government aspirations to lower Energy costs for consumers. There are No controls, No Legislation to limit this profitmaking. This Development would not be contributing to energy security.

2. Secondly I object to the Technology proposed in the Application and the serious dangers to Health and Safety inherent in this technology.

I ask the Examining Authority to consider these Risks and Dangers fully against the Assessment Principles set out in National Policy Statements EN1 – including reference 4.1.7 (unacceptable risk to, or interference with, human health and public safety) and EN3.

Li-ion cells are not consistently stable as is evidenced from the increasing frequency of Home and Recycling centre fires let alone the increasing number of BESS incidents.

The cells to be used in this BESS consist of chemicals and metals that, when stressed or damaged can initiate Thermal runaway – basically meltdown.

This leads to Explosive conditions, temperatures rising to between 800 – 1000 C and the release of very toxic gases including Hydrogen Fluoride.

The Government has published papers recognising this Toxicity and its Dangers.

UK and Global evidence, including the EPRI Electric Power Research Institute database tells us that the BESS will likely experience such events, possibly more than once over its proposed 40 year life, the Risks are inherent in the technology.

The Fire & Rescue Services will need to be given in advance the Equipment and Training they require, these are not fires but Chemical reactions & can become prolonged Emergency Situations.

What the Fire & Rescue Service can do is attempt to cool the Units with vast quantities of water, hoping to prevent the Thermal Runaway spreading to adjacent Units.

However water vapour combined with Hydrogen Fluoride creates a highly Toxic and Corrosive gas plume which will be carried by the prevailing wind (similar to Mustard Gas behaviour in WW1) whilst the vast quantities of now toxic water impact the Ecology and Water Table beyond what is called the "Attenuation basin".

It is relevant that the National Fire Chiefs Council NFCC has labelled Li-ion battery fires Disasters waiting to happen and cause pollution that breaks WHO limits.

This is all going to be happening In Proximity to:

On the East side : Hail Weston, Eaton Ford and Eaton Socon
and to the West : Great Staughton

Communities which include Schools and Care homes.

The real requirements of EN-1 and EN-3 are particularly important here.

East Park Energy's Emissions Assessment already dismisses the proximity of Dwellings, Roads and a Right of Way well within 1 km.

The Authorities will need to maintain active evacuation procedures due to the proximity to populated areas.

This is serious and has to be planned and funded in advance. There is no reference in the Applicant's submission to the recognition of this requirement and to the provision of properly costed funding.

Li-ion Cells have a limited Life expectancy. Replacement and disposal of exhausted / damaged Li-ion cells multiple times during the proposed 40 year life of the BESS will be further serious hazard.

Again the NFCC identifies further risks to Firefighters and the Community during transport, storage and the highly specialised dismantling process. This is not Landfill waste.

It may not be Nuclear waste but it is another seriously hazardous waste with specific legislation still catching-up. There must be a clear and fully funded plan for safe disposal that does not create legacy problems in years to come.

The full magnitude of the Carbon footprint of the BESS itself is not being fully disclosed nor is it being made apparent to the Public.

Lastly the already known effects (reference Public comments and concerns from recently constructed Solar sites) that the high frequency noise from the Inverters would have on Community Health. This is becoming a serious Mental Health concern.

In Summary

This type of technology is not what we as a Community believe is safe for us or for future Generations. All the risks must be weighed against the actual / factual benefits to Consumers & Communities not yet fairly identified in this Application, and including as referenced in multiple sections of National Policy Statements EN1 and EN3.

I ask you to Please recognise the above points and the concerns of the Community and refuse this Development.