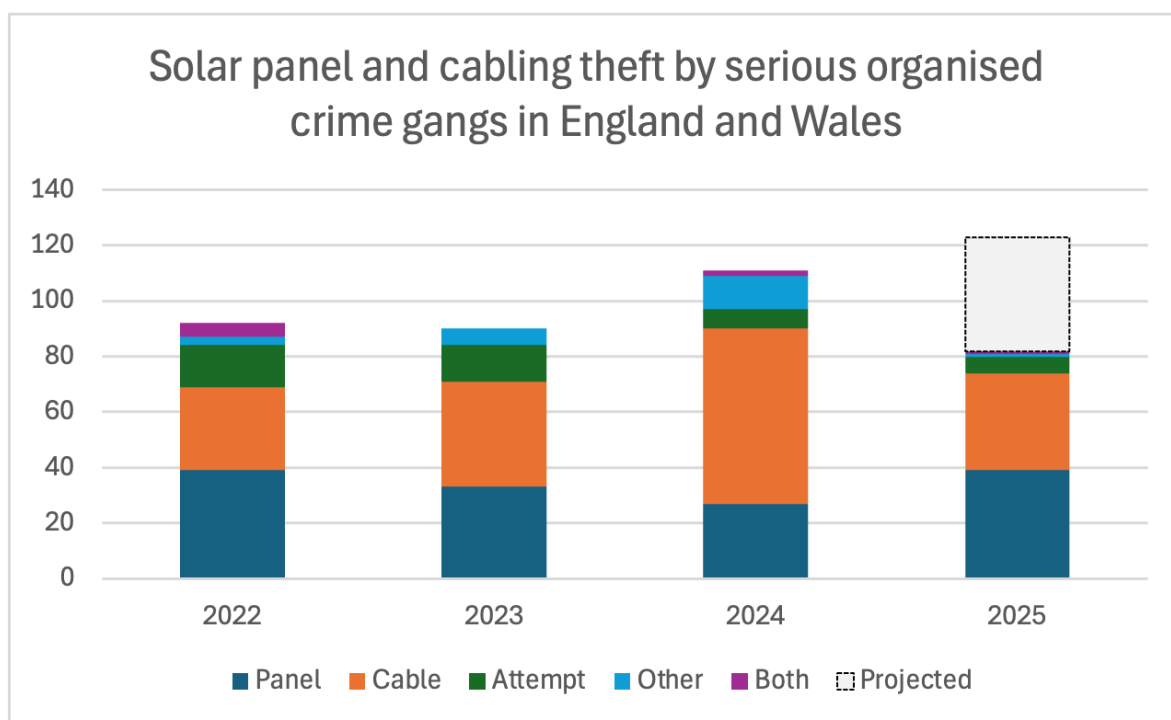


Registered Party Reference Number: [REDACTED]

Written Representation as Expansion of original submission

- 1) **Poor solar performance** - claims by the applicant that in its first year of operation it would achieve generation levels giving a capacity factor of 12.4% are clearly overestimated considering average UK figures achieved in 2025 – the sunniest year on record which demonstrates that a 400mw capacity system would have had a capacity factor of just 11.09%.  
Furthermore, according to regional isolation data for 2024, a 400mw capacity system would have had a capacity factor of just 9.8%. Looking at these two latest years alone, the best average is 10.45% - some way short of the 12.4% figure claimed and even at that inflated figure, a derisory output when considered against its nameplate.
  
- 2) **Crime** - Data from Opal, the serious organised acquisitive crime unit shows that thefts, and attempted thefts of solar panels and cabling is on the rise. See chart below showing available data since 2022. This gives rise to all manner of concerns, not least the well-being of local inhabitants both in terms of their personal safety and that of their property. The need for security measures is acknowledged by the applicant to ensure valuable components are not removed and to this end will install CCTV along the extensive perimeter fencing, as well as security lighting and likely security patrols. This will fundamentally affect the tranquillity and character of the area both for residents, visitors and wildlife.



‘Attempts’: includes unsuccessful thefts and any related damage, and surveillance categorised as offender hostile reconnaissance or suspicious vehicles

Source: 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

**3) Justification of location** – details provided in the applicant’s environmental statement with regards the choice of location are very weak and during the recent specific floor hearings the applicant and its professional team did nothing to convince me that they had taken a robust approach towards site selection. The reference to needing to be no further than 15km from the grid connection seems to be a fictitious figure most likely arrived at due to the costs of cable installation as there are numerous examples of applications that considerably exceed this distance currently in the planning pipeline with at least six other solar NSIPS having a grid corridor of 20Km or more. However, even limiting the distance to 15km there are numerous other areas of more suitable land that have not been sufficiently investigated particularly brownfield sites, commercial rooftops and transport corridors. I would suggest that the land was selected based on sufficient willing landowners, which explains the contorted, illogical design of the four interconnecting sites absorbing small communities unable to cope with a development of such magnitude, utilising approximately 1400 acres of Best and Most Versatile land and destroying the tranquil, undulating countryside for all that live there and others who benefit from it. It is also noted that none of said landowners have personal properties likely to be affected by the scheme and have cynically managed to avoid giving up their game shooting land which upon further

investigation may be more suitable as is further away from dwellings. I would respectively suggest that the site selection needs to be challenged and re-appraised in a sequential manner as one would expect in a more professional application.

**4) Net Zero – Lifecycle carbon calculation**

It appears that this has been considerably underestimated with construction, long term operation, the periodic replacement of parts and decommissioning producing significantly more carbon dioxide than claimed. I would urge the inspector to investigate this in more detail particularly as the applicant does not seem to have considered the mid-point replacement of solar panels, battery components and all other contributory elements that will fail throughout the project's lifetime. This was evident by the dismissive nature of this point during the recent Specific hearings. Nor does the application make any allowance for the 20 on-going staff in operational jobs, 15 of whom are for maintenance and landscape and will presumably have to commute onto the site daily for 40 years which would add more than 500,000 movements. Furthermore, this does not make any allowance for emissions created in the course of their work.

**5) Cumulative impact** – this area of North Bedfordshire/East Cambridgeshire has experienced “solar creep” over the past ten years with the smaller, older sites of Manor Farm and Little Staughton Airfield being joined by new local authority approved schemes and extensions to existing. Should the inspector be minded recommending East Park Energy's plans, a huge 2,800-acre corridor of solar would be created engulfing small, rural settlements and communities and converting the quiet, rural landscape to that of an industrial zone. This seems to be a strange approach to planning and having just come back from a trip to Germany where there are solar panels on the roofs of most industrial units, supermarkets, homes and around the perimeter of airports beyond my comprehension. Why compromise food security for solar power when we can retain food production by siting solar in the right place.

**6) Construction Traffic** - Traffic for the 30 months plus site construction stage is due to leave the A1 at the junction with the B645 towards Hail Weston. The slip road from the A1 is short, quickly meeting oncoming traffic joining the north bound A1. It then proceeds along the notorious B645 road towards Great Staughton. Whilst the road is not officially designated an accident black spot (this is due to the way statistics are presented rather than it not being dangerous), locals are regularly prevented from using the road due to nasty accidents with no viable alternatives other than very long cross-country routes to circumnavigate. At the recent traffic specific hearing the applicants professional traffic expert mentioned that he had driven the route only that morning in his car. It seems incomprehensible that he has made his assessments based on desk surveys. I would suggest that he tries driving in an HGV cab, preferably on a dark, wet morning or evening to get a sense of just how precarious the route is. There are no pavements, no street lighting and numerous bad bends which find motorists often driving over the central white lines.

It was also mentioned at the hearing that until such time that the temporary roads were completed that access to the farthest sites A and B would be necessary by continuing through Great Staughton, The Town and onto Little Staughton and Pertenhall via the Great Staughton Road. There is already a chicane system and 20 mile and hour limit in Great Staughton passing close to many properties, some listed as well as a GP surgery and primary school. I would like to ask how the applicant seriously thinks it can safely manage the huge number of traffic movements through a small village over a 30 plus month build.

The number of traffic movements has been seriously underestimated whether by error or as a cynical effort to downplay the impact and I would suggest that the Inspectorate look at these calculations in detail rather than taking the applicants work at face value.

For all residents of the villages in the immediate vicinity of sites A/B/C and D it will be utterly impossible to go about their daily lives without massive inconvenience and danger throughout the build process. It will also have a knock-on effect in other surrounding villages when HGV drivers, and other associated vehicles deviate from the identified routes as they surely will be due to congestion, time constraints, poor sat nav directions and general mistakes. Routes from the north will affect the historic village of Kimbolton with its tight bend against the castle wall, from the south via the north beds' villages of Ravensden, Bolnhurst, Colmworth, and Riseley to name but a few. All with one thing in common, small, narrow lanes with numerous bends to negotiate.

My own property is adjacent to the access road for [REDACTED], and I enclose three photos taken during the build some ten years ago for the much smaller, Manor Farm site showing the B660 road surface which cracked in just three months – (imagine the damage that a 30-month build would create), the proximity to the single track, gravel road and the entrance from the B660. I have requested that the inspector includes these aspects in his visits – see separate submission.



