

## **East Park Energy Solar Power Complex and Co-located Battery Energy Storage System DCO Application EN010141**

### **Response to Written Representation submitted on behalf of National Grid Electricity Transmission plc**

The Written Representation submitted at Deadline 1 by Addleshaw Goddard on behalf of National Grid Electricity Transmission plc highlights a fundamental inconsistency at the heart of the East Park Energy proposal: the scheme is presented as a single, integrated solar and battery development, yet its two principal components are not equally viable in terms of grid connection.

The solar generating station has secured a Gate 2 connection offer and can therefore be regarded as having a defined pathway to connection, albeit subject to wider network works that do not as yet appear to be fully scoped or certain. In contrast, the proposed battery energy storage system has only achieved Gate 1 status. This is a materially different position. Gate 1 does not confer a confirmed connection date and does not provide a basis for progression through the connections process in the same way as Gate 2.

This distinction is not a matter of timing or programme risk; it goes to the fundamental question of whether the battery element is deliverable at all. Under the current connections regime, there is a real possibility that Gate 1 projects will not proceed to Gate 2 and may exit the queue entirely. The battery component of the scheme must therefore be regarded as uncertain and potentially non-viable.

The application nevertheless seeks consent for a co-located solar and battery project as a single hybrid development. This risks overstating the certainty and functionality of the scheme as proposed. If the battery element does not progress, the development would be materially different in form, operation and impact from that which has been assessed.

This concern is reinforced by the position outlined by Energy Minister Michael Shanks and Ofgem's DG for Infrastructure [REDACTED] in April 2026\*, which identifies a significant oversupply of battery storage projects within the connection queue and the likelihood that a substantial proportion will not ultimately be realised. In that context, it cannot be assumed that this particular battery proposal will secure a connection or be delivered.

In these circumstances, the Examining Authority is faced with an application for a hybrid scheme in which a central, but separate, component may never be capable of implementation. Consent should not be granted on the basis of a combined development where only one part has a credible and defined route to connection, and where the other part remains speculative.

In addition,

- 1 National Grid makes clear that the project is not simply connecting into existing infrastructure, but is dependent on major future works at Eaton Socon substation. That substation is currently full and may require expansion, rebuilding or even a completely new facility, with the final solution not yet determined and subject to the outcome of the National Energy System Operator Connections Reform process. Crucially, the point of connection for East Park remains uncertain. This introduces a fundamental deliverability and programme risk: the project is being promoted through the DCO process without a confirmed final point of connection or defined substation solution.
- 2 National Grid states that it requires "absolute" or "complete" control of land around Eaton Socon to facilitate its own future works. This presents a significant land use and compulsory

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\* Open letter: <https://www.gov.uk/government/publications/connections-reform-delivery-update-and-battery-capacity/open-letter-from-desnz-and-ofgem-on-connections-reform-delivery>

acquisition risk. It suggests that the current Order Limits and land strategy may not be adequate or compatible with the infrastructure required to connect the project. There is a clear risk that East Park's infrastructure – particularly cables and access – could be constrained, relocated or rendered unworkable.

- 3 National Grid considers the Draft Order to be “deficient” because it does not yet include protective provisions in its favour, “despite these having been incorporated into multiple DCOs”. It explicitly states that, without such provisions, there is nothing to prevent the project from adversely affecting the Eaton Socon Substation Project, with “serious detriment” to National Grid and other users of the network. This amounts to a substantive objection from a key statutory undertaker and raises serious doubt as to whether the application is currently in a form that can be safely consented.

The protective provisions sought by National Grid introduce further risks to the East Park project. These provisions would give National Grid significant control over design, construction, land use and timing, including approval rights over works and the ability to require changes. This could materially constrain how the project is built and operated, increase costs and introduce delays, with consequent further impacts on the local communities. National Grid has also indicated that it may pursue these matters through hearings if agreement is not reached, adding further uncertainty to the Examination process.

In conclusion, the scheme is presented as a single, co-located development, yet in reality comprises two distinct components with markedly different levels of certainty. While the solar element has a defined pathway to connection, the battery remains at Gate 1 status, with no assured progression or delivery. This disparity undermines the project's coherence and calls into question whether it can properly be assessed or consented as a unified scheme, particularly given the extent of control sought by National Grid Electricity Transmission plc over land and infrastructure, with clear potential for delay, disruption and constraint on the project's delivery, and associated knock-on effects for local communities.