

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

### **Response to the Applicant's responses to RRs**

The Applicant's thematic response does not answer the substance of my Relevant Representation.

My representation challenged the claimed public benefits of the scheme on the basis that headline installed capacity is being treated as a proxy for real-world public benefit. The Applicant has not provided a quantified response to the distinction between 400MW installed capacity and substantially lower average delivered output, nor has it explained how the scheme materially contributes during winter periods or periods of system stress.

The Applicant repeatedly states that solar capacity factors are "well understood" and that national policy supports solar. That does not answer the specific concern that the planning balance must be assessed by reference to actual output, seasonal usefulness, curtailment risk and system value, not merely installed capacity.

The Applicant also confirms that the BESS would import electricity from the grid and provide grid-balancing services. This supports, rather than resolves, my concern that the battery is not limited to storing surplus on-site solar generation. The Applicant has not distinguished between genuine public benefit and commercial trading/arbitrage value, nor has it demonstrated that the solar-plus-BESS model would reduce consumer costs or materially improve winter resilience.

On land use, the Applicant again relies on policy wording and site-selection documents, but has not answered the proportionality point: whether the loss of substantial Best and Most Versatile agricultural land is justified by the scheme's actual energy contribution. The argument that the land use is "temporary" also fails to address the practical reality of a multi-decade industrial use and uncertainty around restoration of full agricultural capability.

The Applicant's responses on landscape, construction, traffic, noise, flood risk and battery safety rely heavily on management plans and mitigation measures. These have been widely challenged elsewhere and clearly lack the necessary rigour and detail. Only if significantly improved, tightened and underpinned by a robust evidence base might they lessen certain impacts; however, they do not address – let alone overcome – the fundamental harm arising from the development's scale, duration and industrial character.

Accordingly, I consider that the Applicant has superficially addressed the headings of my concerns, but has not attempted a meaningful response to the central planning balance issue: the claimed benefits remain materially overstated, while the long-term harms to farmland, landscape, communities and safety remain significant. The Examining Authority should therefore give limited weight to the Applicant's thematic response where it relies on generic policy support rather than project-specific evidence.

### **Additional general points relating to overall accuracy and adequacy of the Applicant's submission**

- The Applicant's use of misleading qualitative descriptors (eg "some" support vs "several" oppose the scheme) substantially misrepresents the balance of Relevant Representations (approximately 9 in support vs 1,260 in opposition), creating a false equivalence that undermines evidential clarity and transparency.
- A number of other Relevant Representations from individuals raise concerns regarding the Applicant's questionable assumptions, inaccuracies in figures and analysis, and flawed conclusions, as well as presenting distinctive local issues and factors. These more granular but material issues do not appear to have been addressed in the Applicant's response.