

Response to Applicant Response to Written Representations: East Park Energy Solar Power Complex and Co-located Battery Energy Storage System DCO Application EN010141

This response relates to:

- my Written Representation:

<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010141-000470-C%20Patel%20Written%20Representation.pdf>

- the Written Representation made by Addleshaw Goddard on behalf of National Grid Electricity Transmission plc:

<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010141-000501-NGET%20Written%20Representation%20-%20East%20Park%20Energy.pdf>

- my Response to Written Representation submitted on behalf of National Grid Electricity Transmission plc:

<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010141-000650-Response%20to%20Written%20Representation%20submitted%20on%20behalf%20of%20National%20Grid%20Electricity%20Transmission%20plc%20C%20Patel.pdf>

The Applicant's response set out in its 'Applicant Response to Written Representations' does not adequately address the central issue raised in my Written Representation: that the Application presents East Park Energy as a coherent hybrid solar-and-battery scheme delivering integrated public benefits, while the evidence before the Examination increasingly suggests that:

- the battery component may never secure a deliverable connection pathway;
- the battery would operate substantially independently from the solar installation for large parts of the year; and
- the claimed relationship between the solar and battery elements is materially weaker in practice than presented within the Application.

This issue is fundamental because the Applicant repeatedly relies on the combined operation of the solar farm and Battery Energy Storage System (BESS) to support claims regarding:

- energy security;
- intermittency mitigation;
- flexibility;
- decarbonisation; and
- wider public benefit.

However, the Applicant's own response does not substantively reconcile those claimed benefits with either:

- National Grid Electricity Transmission plc's Written Representation evidence regarding the unresolved and speculative status of the battery connection; or
- the operational and seasonal evidence submitted within my Representation concerning the very low regional solar output expected during autumn and winter periods.

NGET's Written Representation is particularly significant because it implies that the proposed battery component is not presently progressing through the network connection process in the same manner as the solar element.

NGET states:

“Under the Connections Reform process, connections which are ready and satisfy the requirements for strategic alignment are prioritised. Customer applications will be assigned as either a “Gate 1” project, or as a “Gate 2” project, based on whether they meet the necessary criteria.

Where a project is designated as “Gate 2”, these are projects which are ready for connection. Where a project is designated as “Gate 1”, these projects are deemed as not ready and the customer will need to reapply in the future in order to obtain a “Gate 2” offer. We note that the Promoter has received a Gate 2 offer for its connection for the solar farm only, with a Gate 1 offer for the battery connection. As such, NGET are only in a position to progress the designs for the solar connection under the Gate 2 offer at this stage.”

These statements from NGET could have major implications which the Applicant's response does not properly confront.

The Applicant continues to rely on the proposition that East Park Energy is an integrated hybrid development, yet NGET's evidence to the Examination expressly confirms that its present infrastructure design work relates only to the solar generating station. The battery component remains at Gate 1 status and is therefore not presently regarded as connection-ready.

The significance of that uncertainty is reinforced by the recent Department for Energy Security and Net Zero and Ofgem open letter* concerning battery oversupply and Connections Reform. The letter expressly acknowledges that only some Gate 1 battery projects are expected to progress toward Gate 2 and that:

- “some projects will likely leave the queue”.

DESNZ and Ofgem further stress the need to ensure that:

- “non-viable projects leave the queue before the network companies have committed significant capital expenditure”.

The implication is clear: Gate 1 status does not provide any assurance that a battery project will ultimately proceed to connection or implementation.

Accordingly, the Applicant's continued presentation of the development as a deliverable integrated hybrid scheme is difficult to reconcile with the evidence presently before the Examination.

That issue becomes even more significant when considered alongside the operational evidence contained within my Written Representation regarding actual regional solar performance.

* Open letter from DESNZ and Ofgem on connections reform delivery, Published 16 April 2026, Energy Minister Michael Shanks, Ofgem Director General for Infrastructure Akshay Kaul: <https://www.gov.uk/government/publications/connections-reform-delivery-update-and-battery-capacity/open-letter-from-desnz-and-ofgem-on-connections-reform-delivery>

The Representation included detailed insolation modelling and accompanying output graphs for a proxy 400MW solar installation using actual 2024 and 2025 regional data. Those graphs demonstrated extremely pronounced seasonal variability, with exceptionally low output during quarters 1 and 4 ; in other words, materially depressed generation across prolonged autumn and winter periods.

The evidence presented showed regional annual capacity factors of approximately 9.88% for 2024 and 11.09% for 2025, the latter being the sunniest year on record. The Representation specifically questioned how the Applicant's claimed first-year generation estimate – equivalent to a 12.4% capacity factor – could realistically be characterised by the Applicant as “conservative” when compared against actual recent regional performance. The inclusion of 2025 particularly highlights the overly optimistic nature of the Applicant's estimate; this record-breaking year delivered a regional capacity factor more than 10% lower than the Applicant's projected capacity factor for its first year of operation.

The Applicant's response does not substantively engage with this evidence.

In particular, the Applicant does not:

- dispute the seasonal output modelling;
- challenge the regional insolation data;
- provide equivalent project-specific winter generation modelling; or
- quantify likely output during periods of peak winter demand and system stress.

Instead, the Applicant largely reverts to broad annual generation figures and general national policy support for solar generation.

The seasonal evidence set out in my Representation goes directly to the practical operational relationship between the solar installation and the battery component.

During prolonged low-output autumn and winter periods, the BESS would necessarily become increasingly dependent on imported grid electricity rather than on-site solar generation in order to operate at scale.

Yet the Applicant simultaneously seeks to:

- rely on the battery as part of the integrated renewable energy and energy security case for the scheme; while
- downplaying or avoiding substantive discussion of the battery's likely commercial role as a grid-connected trading asset importing and exporting electricity according to market conditions.

This creates a significant tension within the Applicant's case.

On the one hand, the Applicant relies on the BESS to strengthen the claimed public benefits of the solar scheme, particularly regarding intermittency mitigation and flexibility.

On the other hand, when my Written Representation raises questions concerning:

- grid imports;
- electricity arbitrage;
- storage of gas-derived electricity;
- operational independence from the solar power complex; and
- the proportion of battery operation likely to be driven by wholesale trading rather than renewable generation,

the Applicant largely declines to provide quantitative answers, instead responding that there is “no statutory or policy requirement” to provide such information.

The Applicant therefore seeks to rely on the battery component when asserting public benefits, while simultaneously avoiding substantive examination of how the battery is likely to operate in practice.

That position becomes particularly problematic given that:

- the battery may never ultimately secure a deliverable connection pathway at all;
- NGET is not presently progressing battery connection design work;
- solar output during autumn and winter periods is demonstrated by the submitted regional modelling to be extremely limited; and
- the battery’s practical operation during those periods would likely depend substantially on imported grid electricity, from a variety of sources, rather than co-located renewable generation.

Taken together, the evidence increasingly suggests that the Examination is not presently considering a clearly deliverable integrated hybrid renewable energy scheme in the form described by the Applicant.

Rather, the evidence points toward:

- a solar generating station with highly seasonal and materially constrained autumn and winter output; and
- a separate battery component whose connection status, operational role, practical integration with the solar installation and ultimate deliverability all remain uncertain.

That distinction is fundamental to the planning balance because the Applicant repeatedly relies on the claimed integrated operation of the solar and battery elements in support of assertions regarding energy security, decarbonisation and system flexibility.

If the battery component may never obtain connection approval, and if its practical operation would in any event become increasingly detached from on-site solar generation during prolonged low-output periods, then the coherence of the Applicant’s claimed hybrid renewable energy case is fundamentally weakened.