STOP
EAST PARK
ENERGY
SOIL OVER SOLAR

26 May 2026

East Park Energy Development Consent Order (EN010141)

Response to the Applicant Response to Stop East Park Energy, and the Examining Authority's Written Questions and Requests for Information (ExQ1): for the attention of the Examining Authority

Stop East Park Energy (SEPE) is an independent, community-led group established in response to the proposed East Park Energy solar and Battery Energy Storage System (BESS) development. The group, which operates on an unfunded, entirely voluntary basis, has more than 1,000 registered supporters, and comprises residents, landowners and stakeholders from across Hail Weston, Great Staughton, Little Staughton, Pertenhall, Keysoe, Swineshead, and neighbouring settlements including Perry, Stonely, Kimbolton, Catworth, Buckden and St Neots, all of whom may be directly or indirectly affected by the project.

This submission includes the following sections:

8. Ecology and nature conservation
    1) Uncertainty over aspects of the ecological baseline and subsequent assessment of specific environmental impacts
    2) ‘Statement of Common Ground (Draft) between the Applicant and Environment Agency’
    3) ‘Statement of Common Ground (Draft) between the Applicant and Natural England’
    4) ‘Applicant Response to Stop East Park Energy’
9. Relationship of the SEPE submissions to Local Impact Reports and wider Examination evidence
10. A note on the Stop East Park Energy Written Representation and the Applicant’s response to the SEPE WR
    1) Case law cited by SEPE

1 Introduction

SEPE is grateful to the Examining Authority for the detailed questions issued at ExQ1. References to relevant Examining Authority questions have been incorporated throughout this submission where appropriate, alongside additional questions which SEPE respectfully invites the Examining Authority to consider during its ongoing examination of the proposed development.

This submission should be read alongside SEPE's Written Representation (WR), the contents of which remain relied on unless superseded. The fact that particular matters raised within the WR are not repeated or developed further within this submission should not be taken to indicate that those concerns have been resolved, addressed satisfactorily by the Applicant, or are no longer considered material by SEPE. On the contrary, SEPE notes that a number of specific matters raised within the WR do not appear to have been addressed within the Applicant's response.

The omission of those matters is material because many relate directly to the central planning-balance question identified throughout the WR: namely whether the scale, certainty and durability of the claimed public benefits are sufficient to justify the identified land-use, environmental and community harms associated with the proposed development.

Accordingly, where issues raised within the WR are not revisited in detail within this submission, this should not be interpreted as agreement with the Applicant's position, nor as acceptance that the underlying concern has ceased to be relevant to the Examination. Rather, this submission focuses principally on matters which SEPE considers particularly important to clarify further in light of the Applicant's response and the ongoing Examination process.

2 Battery energy storage system

2.1 Uncertainty over grid connection and BESS viability

Questions remain over the certainty and deliverability of the Scheme's proposed grid connection arrangements, specifically in relation to the battery energy storage system (BESS). While the Applicant presents the connection position as settled, material submitted by National Grid Electricity Transmission plc (NGET) and a recent government statement suggest that important aspects of the proposal may still be unresolved.

In its response to a number of points in the SEPE WR, the Applicant refers to a 'Gate 2' "generation connection offer":

> "Following the widely publicised grid reform process undertaken by the National Energy System Operator (NESO) over the past few years, the Applicant received a 'Gate 2' generation connection offer to the Eaton Socon Substation which is 2030-aligned."

This reference is made three times in the Applicant's document, dated April 2026.

It goes on to say:

> "A Grid Connection Agreement is a firm obligation by National Grid Electricity Transmission (NGET) to enable the Applicant to connect the Scheme to the NGET Eaton Socon Substation. This is clearly defined and there are no uncertainties in respect of this."

This appears to be ambiguous. The Written Representation submitted by Addleshaw Goddard on behalf of NGET, dated 7 April 2026, 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."

The NGET WR confirms that with only a "Gate 1 offer for the battery connection", the BESS element of the scheme does not currently feature in its plans for the Eaton Socon Substation Project.

The NGET WR additionally establishes that there are caveats associated with the "solar farm" component of the scheme:

> "The East Park Project is reliant on the construction and operation of the Eaton Socon Substation Project in order to connect into the National Grid and therefore NGET requires absolute control over the land around the Eaton Socon substation as well as other land in close proximity to the Eaton Socon substation in order to facilitate the Eaton Socon Substation Project and the East Park Project's connection.
>
> The Eaton Socon Substation Project is critical infrastructure to enable the connection of multiple projects at this location, with the East Park Project being only one of a number of projects referred to on the National Energy System Operator Transmission Entry Capacity (TEC) register as requiring a future connection to the Eaton Socon substation, including for Clearstone Energy Limited's and Telis Energy's projects."

The NGET Representation does not convey the lack of "uncertainties" suggested by the Applicant in its response to the SEPE WR.

The uncertainty surrounding the proposed East Park BESS is further reinforced by the April 2026 open letter issued jointly by the Department for Energy Security and Net Zero (DESNZ) and Ofgem[1], which explicitly acknowledges that the current grid connections queue contains what it describes as a "battery surplus" – a substantial oversupply of battery storage projects – and that many schemes may never ultimately secure viable connections or proceed to delivery. As set out in NGET's Written Representation, the East Park BESS currently holds only Gate 1 status, unlike the solar element which has obtained a Gate 2 offer, meaning the battery component does not presently have a confirmed or deliverable route to connection under the reformed regime. The recent DESNZ/Ofgem letter appears to undermine any assumption that the proposed co-located battery infrastructure can be treated as certain or inevitable.

In these circumstances, the current connection position introduces uncertainty as to the timing, deliverability and operational role of the BESS component, raising important questions about whether the Scheme can properly be assessed and justified as a single integrated solar and battery NSIP, particularly where the operational characteristics of the development would be materially altered in the absence of the battery component.

Relevant Examining Authority questions

Q1.1.20 The applicant. Grid Connection. In response to National Grid's Relevant Representation [RR-903] it is stated in the Applicant's Responses to Relevant

[1] Open letter from DESNZ and Ofgem on connections reform delivery, Department for Energy Security and Net Zero and Ofgem, 16 April 2026: https://www.gov.uk/government/publications/connections-reform-delivery-update-and-battery-capacity/open-letter-from-desnz-and-ofgem-on-connections-reform-delivery

Representations submitted at D1 [REP1-055] that "The Applicant can confirm that the Scheme received a 'Gate 2' offer with a connection date of October 2028, with an October 2030 backstop.". Please supply evidence of the offer and agreement.

Q1.1.21 National Grid / The applicant. In National Grid's relevant representation [RR-903], it is stated: "The scope of the expansion, rebuild or provision of a new substation of East Socon Substation is as yet unknown and will be determined by the outcome of NESO's Connection Reforms process. Please provide projected timelines by which this will be determined and the timetable for the expansion, rebuild, or the construction of a new substation . If this coincides with the construction of the proposed development, have the cumulative impacts of the works to East Socon site been considered?

Additional relevant questions

On the basis of the connection status position set out in the NGET representation:

1. Does the Applicant still maintain that there are "no uncertainties" in relation to the Scheme's grid connection arrangements, given the content of NGET's Representation and its identification of the BESS as holding only Gate 1 status?
2. Given that it appears the BESS currently has no assured progression from Gate 1 to Gate 2, on what basis does the Applicant consider the battery element to be deliverable and viable?
3. In light of the apparently differing connection status of the solar and BESS elements, on what basis does the Applicant continue to describe the Scheme as a single 'hybrid' or co-located NSIP?
4. Which elements of the Applicant's need case and claimed benefits depend specifically on delivery of the BESS element?
5. In the absence of a confirmed and deliverable connection route for the BESS, what weight does the Applicant consider should be attached to the claimed benefits of the battery element?

2.2 BESS arbitrage and grid services – including low season solar power operational profile

The central issue is whether the Examination has been given an adequate evidential basis to understand the extent to which the proposed BESS would function operationally and commercially as an independent merchant storage asset rather than principally as storage associated with the co-located solar generation.

SEPE's WR set out concerns over the likely operational role of the BESS:

> "The Environmental Statement does not provide sufficient operational or contractual evidence to demonstrate that the proposed Battery Energy Storage System (BESS) will function as an integrated component of the renewable-energy scheme rather than as a merchant storage asset operating independently of the co-located solar generation.

> The Applicant asserts that the BESS will contribute to grid balancing and renewable integration but provides no supporting operational evidence, such as:
>
> - an operational model, dispatch logic or cycling strategy;
> - state-of-charge modelling demonstrating integration with solar generation;
> - identification of specific system-service roles (e.g. frequency response, balancing reserve, inertia or resilience services);
> - evidence of contractual or operational linkage with National Grid ESO or equivalent system operators; or
> - confirmation of charging sources and whether grid-charging will occur independently of the solar generation."

The Applicant's response to concerns raised regarding the operational role of the proposed BESS appears to rely primarily on broad assertions regarding flexibility, grid balancing and co-location without engaging with the principal evidential concern identified by SEPE: namely, that the operational characteristics and economic rationale of the BESS are likely to extend substantially beyond the storage of surplus on-site solar generation during spring or summer months.

SEPE's concern is that the Examination has not yet been provided with sufficient evidence to understand the extent to which the proposed 100MW BESS would operate as a wider market-trading and grid-services asset importing and exporting electricity independently of the solar facility. This distinction is important because it affects the assessment of need, operational impacts, cycling intensity, safety, component replacement assumptions, traffic associated with maintenance and replacement, and the claimed carbon and system benefits relied on in the planning balance. It also bears directly on whether the BESS should properly be regarded as a fully integrated component of the renewable-energy scheme or as a distinct commercial storage asset.

In its WR, SEPE suggested:

> "The Examining Authority should require the Applicant to submit, prior to any recommendation or decision, a BESS Operational Integration and Carbon Impact Statement demonstrating the operational role and climate contribution of the proposed storage facility. This should include:
>
> - the intended operational model, dispatch logic and cycling regime;
> - anticipated annual import and export energy throughput (MWh);
> - evidence of operational integration with the co-located solar generation;
> - confirmation of charging source and whether grid charging will occur independently of the solar generation;
> - round-trip efficiency losses and operational duty cycle;
> - identification of grid-service function / system- service roles (e.g. frequency response, balancing reserve or inertia services) or confirmation that the facility will operate on a merchant basis;

- quantified net greenhouse-gas impact scenarios associated with BESS operation;
- confirmation of whether BESS charging will be operationally constrained or linked to the scheme's renewable generation; and
- explanation of the energy system benefits relied upon in the planning balance.

In the absence of such information, the Examining Authority cannot determine whether the BESS forms an integrated component of the renewable-energy scheme or constitutes a separate commercial storage development requiring independent policy justification under EN-1."

However, in its response, the Applicant stated:

> "The 'intended operational model, dispatch logic and cycling regime' is not a matter that needs to be considered as part of the planning merits of the approach taken, and nor is it something that the Applicant could accurately quantify or define in any meaningful way at this stage."

The Applicant's response does not appear to substantively address the subsequent related points set out in the SEPE WR and reproduced above, other than a brief dismissal:

> "The planning regime does not require the BESS to be restricted to charging only from the co-located solar array, or to be restricted from wider grid-balancing services, in order to remain associated development. National policy positively supports solar co-located with storage, and the policy framework treats battery capacity as part of the flexible system needed to store renewable output and balance the grid."

SEPE submits that the concerns and requests it has raised remain highly relevant. They go directly to the function and status of the BESS and how the Applicant justifies its treatment as "associated development", when its operational profile, in relation to key details around storage of imported energy from the grid and the extent of its operational integration with the co-located solar generation across the annual cycle, is not yet transparently established for scrutiny under the Examination.

The commercial viability of large-scale co-located battery systems is inherently dependent on forecasting future operational behaviour and revenue streams.

At £73 million, the BESS forms a substantial proportion of the estimated cost to construct the Scheme (nearly 20%); is likely to incur significant ongoing component replacement costs; and introduces considerable additional infrastructure, safety and environmental considerations. It is therefore difficult to reconcile the Applicant's claimed inability to provide even broad operational parameters with the level of financial commitment and engineering design evidently underpinning the proposal.

The evidence before the Examination strongly indicates that co-located BESS infrastructure is deployed not merely to avoid curtailment of solar generation in higher output months, but to enable wider arbitrage trading and participation in ancillary grid-service markets throughout the year. Such operation necessarily involves import and export activity independent of contemporaneous on-site solar generation, including charging from the wider grid during periods of low pricing and discharging during periods of higher demand and elevated pricing.

Recent analysis of large-scale solar and co-located battery systems[2], conducted by a renewable energy policy academic, indicates that the commercial viability of BESS infrastructure is increasingly dependent on import/export trading and ancillary grid-service revenues rather than solely on storing surplus on-site renewable generation. The analysis notes that electricity imported from the grid for later resale "will be from any source on the network, including gas" and that import capability is essential to access these wider revenue streams. In practical terms, particularly during autumn and winter months when solar output is low, the BESS may therefore operate extensively using electricity imported from the wider grid rather than contemporaneous on-site solar generation. This is directly relevant to the Applicant's description of the Scheme as clean-energy infrastructure, because the electricity subsequently discharged and exported by the BESS would not necessarily constitute renewable generation originating from the co-located solar arrays.

Regional and local evidence presented in the SEPE WR supports this conclusion: it includes data showing the extreme seasonal variation in regional insolation over the past two years, alongside capacity factors recorded at a local solar power site that remained consistently below the national average during its first two years of operation (SEPE WR; Appendix F – Solar generation performance and indicative system contribution evidence, and section 5 of this submission).

While SEPE recognises that the Shepway NSIP[3] is a separate scheme with a different solar-to-storage ratio, SEPE notes that during recent engagement between SSE Renewables and local community representatives regarding the proposed Shepway Energy Park in Kent, it was apparently indicated that the proposed BESS would not be connected to the project's co-located, multi-site solar arrays, reportedly because the solar generation alone would not produce sufficient surplus electricity to make dedicated storage commercially worthwhile, but would instead operate as a grid-balancing and import/export asset. The example appears consistent with the wider commercial and operational trends discussed in the SEPE WR and above, namely that large-scale co-located BESS infrastructure may derive substantial

[2] 'Battery energy storage trading: who pays the price? Large-scale solar utilities with co-located battery storage – a brief exploration of the business case', Professor Tony Day: https://drive.google.com/file/d/1Egw0s7OcyzfPXlsdOAm64_dXReZjlSyT/view

[3] Shepway Energy Park EN0110017: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110017

operational value from wider arbitrage and ancillary grid-service functions rather than primarily from storing surplus on-site solar output.

This reality is directly relevant to the Applicant's description of the BESS as merely "associated development … subordinate" to the principal solar generating station. The greater the extent to which the BESS may derive value from year-round trading, balancing and wider network services rather than direct solar storage, the more important it becomes that the Examination understands the anticipated operational profile of the battery element in its own right.

The Applicant's response to these specific points raised in the SEPE WR also does not engage with the implications of the present grid connection uncertainty affecting the battery component. As set out in section 2.1 of this submission, the NGET Representation indicates that the solar element and battery element do not currently appear to hold equivalent connection status under the reformed queue process. This reinforces the importance of understanding which claimed benefits are genuinely dependent on the BESS and whether the battery element is, in practice, integral to the Scheme's viability and commercial case.

SEPE does not suggest that precise future trading behaviour can be predicted with certainty over the lifetime of the development. However, it seems entirely reasonable for the Examination to expect the Applicant to provide evidence-led assumptions regarding likely charging patterns, seasonal operation, cycling intensity and the anticipated balance between solar-storage activity and wider grid-service operation. These matters are material to the assessment of environmental effects, safety considerations, replacement cycles, carbon performance and the overall planning balance.

In the absence of that information, SEPE maintains that the Examination is presently being asked to assess a substantial battery storage development without a sufficiently transparent explanation of how it is realistically expected to operate over its operational lifetime.

Relevant questions

1. During periods of low or negligible on-site solar generation, particularly in autumn and winter months, what proportion of the BESS's anticipated operational activity does the Applicant expect will involve charging directly from the wider electricity grid rather than from co-located solar generation?
2. What evidence-based assumptions has the Applicant used in its financial modelling regarding the anticipated proportion of BESS revenue derived from wholesale electricity arbitrage and ancillary grid-service markets, as distinct from the storage and export of on-site solar generation?
3. The Applicant's position is that it cannot "accurately quantify or define in any meaningful way at this stage" future operational behaviour. How has the Applicant assessed likely annual cycling intensity, degradation rates, replacement intervals and associated maintenance activity for the BESS over the operational lifetime of the Scheme?

4. In circumstances where the BESS may operate extensively as a year-round import/export grid-services asset independent of contemporaneous solar generation, on what basis does the Applicant continue to describe the battery element as merely “associated development” subordinate to the principal generating station?
5. Can the Applicant provide the Examination with any indicative seasonal operational profile, dispatch modelling, or charging/discharging assumptions used internally to support the commercial viability, engineering specification or environmental assessment of the proposed 100MW BESS?

2.3 Battery safety

SEPE particularly welcomes that the Examining Authority has already raised a number of questions regarding BESS technology selection, operational safety, firewater containment, inspection regimes and cumulative effects through ExQ1.

In that context, SEPE submits that one of the key remaining issues is whether the current oBSMP and associated dDCO provisions secure sufficient certainty and enforceability to justify the Applicant’s position that additional Requirement wording proposed by SEPE is unnecessary.

SEPE notes that, while the Applicant’s oBSMP references many relevant safety topics and future assessment processes, substantial elements of the detailed BESS safety case remain dependent on future studies, testing, consultation and post-consent approvals. These include matters such as:

- large-scale fire testing;
- detailed plume analysis;
- hazard mitigation analysis;
- FMEA/HAZOP/DSEAR assessments;
- detailed suppression system design;
- emergency response planning; and
- final agreement with Cambridgeshire Fire and Rescue Service.

SEPE further notes that the Applicant’s own BESS Fire Emissions Modelling appendix identifies that the detailed Emergency Response Plan will be developed at detailed design stage and will incorporate procedures and actions based on future thermal runaway test data supplied by the eventual BESS system provider.

SEPE does not suggest that such staged development is inappropriate in principle, nor that all technical detail must necessarily be fixed at application stage. However, SEPE submits that this illustrates the extent to which certain operational safety assumptions and emergency response measures remain dependent on future technology selection, provider-specific testing and post-consent detailed design development.

SEPE further notes that the Host Authorities' own LIR responses identified limitations in specialist in-house expertise in certain technical areas and reliance on the Examination process itself to test aspects of the Applicant's evidence base.

In that context, SEPE notes that a number of additional Requirement provisions and operational controls proposed by SEPE have been characterised by the Applicant as "unnecessary", notwithstanding that equivalent detailed provisions do not presently appear to be fixed within either the dDCO Requirements or the current oBSMP drafting.

SEPE submits that the key issue for the Examination is not whether battery safety matters are acknowledged in principle within the oBSMP, but the extent to which the likely significant effects, mitigation assumptions and operational controls can presently be understood, tested and secured at the point of recommendation.

Relevant Examining Authority questions
Q1.1.1 The applicant. Outline Battery Safety Management Plan [APP-162]. Paragraph 1.2.1 states that 'For the purposes of this document a concept design has been considered that uses a BESS system based upon lithium iron phosphate (LFP) lithium-ion battery technology.' What other battery technology could be considered and has an options analysis been undertaken to prove LFP is the most acceptable choice?

Q1.1.2 The applicant. Outline Battery Safety Management Plan [APP-162]. What is the expected cyclical inspection/maintenance regime proposed to ensure the safety of the BESS?

Q1.1.6 The applicant. BESS. Can you advise what the design philosophy was for concentrating the BESS in one area, rather than have a dispersed approach across multiple fields for the BESS.

Q1.1.7 The applicant. BESS. What cumulative effects are there when assessed against other BESS provision within the area.

Q1.1.8 The applicant. BESS. Please indicate if there any proposed bunds to be designed into the scheme to prevent any firewater contaminating surrounding land in the event of a fire.

Q1.1.9 The applicant. BESS. It is acknowledged that there is over 400m separation distances from the nearest residential property, notwithstanding this please indicate what other measures are to be implemented to reduce the risk of fire and explosion to residential properties.

Note in relation to Q1.1.1: Battery safety experts are concerned that lithium iron phosphate (LFP) batteries, which are suggested by some scheme promoters to be safer because higher temperatures are typically required before thermal runaway occurs, can still undergo thermal runaway under certain failure conditions. They may

also present explosion hazards associated with electrolyte vapour clouds and can emit fluorinated compounds during fires.

Additional relevant questions

1. Which specific provisions within the Applicant's submitted oBSMP are said to provide equivalent control and enforceability to the Requirement wording proposed by SEPE?
2. Does the Applicant accept that substantial aspects of the detailed BESS safety case remain subject to future assessment, testing, consultation and post-consent approval?
3. How does the Applicant consider that substantial post-consent technical submissions and approvals relating to the detailed BESS safety case would be independently scrutinised and validated in practice, particularly where Host Authorities have already identified limitations in specialist in-house expertise and reliance on the Examination process to test certain technical matters?
4. Would the Applicant's current drafting of the dDCO and oBSMP permit materially different BESS technologies, layouts or operational strategies to be implemented post-consent from those assessed within the Environmental Statement?
5. Which minimum BESS safety and operational parameters are intended to remain fixed regardless of future detailed design evolution?

2.3(i) High-pressure gas pipeline

Additionally, in relation to wider battery system safety concerns, the SEPE WR states:

> "These uncertainties are further compounded by the presence of an unassessed high-pressure gas pipeline within Site D (Section 15.3), which may impose additional engineering, exclusion-zone or foundation constraints that the Environmental Statement does not evaluate."

The Applicant does not engage fully with this point but instead states:

> "The Applicant has provided the required easements to the utilities that cross Site D, these offsets are embedded into the Scheme design and accounted for in the assessed layout. These buffers are, in part, designed to safeguard the utilities from damage or disruption. Where it is necessary to cross utilities, particularly during the construction phase, it will be necessary to agree safe working practices with the utility operators prior to undertaking works.
>
> The Applicant has consulted the relevant asset owners through the pre-application phase and remains in discussions with each of them, including in relation to protective provisions for their assets.
>
> The Applicant has prepared an outline Battery Safety Management Plan [APP-162] that includes measures to mitigate potential impacts in the unlikely

event there was a fire at the BESS. With the control measures in place, the Applicant does not consider that a fire within the BESS would pose any material risk to the buried utilities."

This is ambiguous in relation to the status of the high-pressure gas pipeline discussed in the SEPE WR. Figure 1 demonstrates the close proximity of the high-pressure gas pipeline to the proposed BESS. While the Applicant has provided evidence that an oil pipeline crossing the proposed site is redundant, SEPE has so far been unable to locate similar evidence within the application materials demonstrating that the gas pipeline also has 'redundant' status.

Figure 1: High-pressure gas pipeline in Site D, adjacent to BESS compound. Pipeline path marked in yellow. Arrow indicates site of Cadent high-pressure gas pipeline marker including enquiry and emergency contact details

Additional relevant question

Can the Applicant indicate where evidence can be found to show the status of the high-pressure gas pipeline in close proximity to the BESS compound in site D?

3 Construction and other project traffic

3.1 SEPE's Deadline 2 submissions

- Comments on National Highways Statement of Common Ground, the updated Outline Construction Traffic Management Plan, and the Applicant's Technical Note on impact on the B645 / A1 St Neots junction
- Comments on any updated or additional documents from the Applicant: Applicant's drive-through of local highway network
- Comments on any updated or additional documents from the Applicant: Applicant's drive-through of local highway network – note to accompany SEPE video/SEPE video

SEPE awaits a response to its Deadline 2 submissions.

SEPE commented on the Applicant's technical note and oCTMP, and responded to the National Highways SoCG.

In brief, this Deadline 2 SEPE submission:

- raises concerns that the proposed construction traffic routing strategy could create unassessed HGV U-turn movements at the Little Paxton Junction and Buckden Roundabout, with possible wider implications at the A1/A428 Wyboston Junction; this junction (and/or the Black Cat Junction) will also need to be used for U-turn movements
- questions whether the Applicant's traffic modelling and survey methodology at other junctions in the locality impacted by construction traffic are robust enough, compared to exercises undertaken at another local NSIP
- suggests that lifecycle traffic impacts are not fully assessed, including operational maintenance, replacement traffic and decommissioning traffic
- highlights the lack of a clear permitted/restricted construction routes plan and seeks stronger DCO-secured controls over routing, enforcement, monitoring and highway condition surveys
- questions why some HGV movements would use public roads between site areas when internal haul roads appear available, and challenges very low forecast traffic assumptions at several site accesses
- raises ongoing concerns over access design, visibility splays, hedgerow impacts, temporary speed reductions and reliance on incomplete survey data
- challenges assumptions in the Construction Workers Travel Plan, especially the assumption of two workers per car, and requests sensitivity testing using lower occupancy rates.

Appendix A of this Deadline 2 submission adds practical haulage industry concerns, including doubts over enforceability of routing controls, likely driver behaviour, suitability of temporary haul roads and risks from lifting weight restrictions across the local rural road network.

The submission suggests significant traffic, safety, routing and enforcement issues remain unresolved, and further assessment and scrutiny are requested from National Highways and the Examining Authority before conclusions on traffic impacts can be considered robust.

In addition, SEPE commented on the Applicant's 'Drive-through of local highway network' as well as submitting an alternative version, from the perspective of an HGV cab, of the section from the A1 to Site D and the main construction compound access.

In brief, these Deadline 2 SEPE submissions:

- contend that the Applicant's drive-through video is incomplete and unreliable as evidence for assessing construction traffic impacts, for example omitting sections of the route, poorly contextualising the route, and leaving numerous junctions, local access points, residential entrances and roads heavily used by local communities unidentified
- highlight safety concerns on narrow, winding rural roads, especially along the B645's Pigg's Hill, described as a local accident blackspot with poor visibility and dangerous winter conditions
- suggest that the construction traffic route may be far more difficult and dangerous for large volumes of HGV convoys, site worker traffic and abnormal loads than the Applicant's car-based footage suggests
- caution that wider traffic impacts on villages such as Little Staughton and Hail Weston, where affected roads are major access routes for residents, should be assessed
- demonstrate, via HGV footage of a sample section of the route, bends, road width constraints, visibility problems and manoeuvring difficulties
- raise wider concerns with waiving weight restrictions across the proposed route.

SEPE notes that Pigg's Hill was the location of a fatal accident as shown on Image 3.3 in the 'Environmental Statement Volume 2 – Technical Appendices Appendix 9-1: Transport Assessment'. This document also confirms that this fatal injury accident involved a collision between a car and an HGV.

3.1(i) Issues with personal injury accident data

Further to these Deadline 2 submissions, SEPE notes that Image 3.3 'Road Safety Record Along Local Highway Network in Vicinity of Scheme (2020-2025 Inclusive)' in the 'ES Appendix 9-1: Transport Assessment' shows an accident cluster, including a fatal injury accident, at the A1/B645 junction. This figure also shows that a fatal injury accident occurred at/near the B645/Moor Road Junction.

However, SEPE notes that these accidents are excluded from the data in Table 3.2 which follows Image 3.3. This misrepresents the recent safety record at these junctions, which is a material matter because:

- the A1/645 junction will see a significant increase in traffic volumes for access to and from the main site compound during construction and decommissioning (as set out in the Construction Access Strategy); and
- the B645/Moor Road junction will be used during the operation phase for traffic movements to and from Site Access SA13 (as confirmed on Figure 11 in Appendix D of the oCTMP).

SEPE also notes that in its 'ES Appendix 9-1: Transport Assessment', the Applicant states:

> "The road safety record of the local highway network within the study area has been examined for the most recently available five-year period".

It goes on to set out personal injury accident data for the period 1 April 2020 to 31 March 2025 inclusive. It does not appear, however, to acknowledge that this date range includes both part of the Covid-19 pandemic period, during which road use patterns were materially affected, and the immediate post-pandemic period, during which Department for Transport data[4] shows that traffic volumes remained below pre-pandemic levels.

SEPE would also suggest that the Applicant's identification of specific times associated with certain recorded accidents, together with references to those times falling outside the proposed construction hours, appears to place undue emphasis on whether certain incidents occurred during proposed construction hours, despite the wider relevance of the accident record to baseline highway safety conditions and network sensitivity.

3.1(ii) Concerns over plans for haul roads and future traffic impacts

Additionally, SEPE is concerned about the potential adverse safety impact on the B645, Moor Road and Great Staughton Road following removal of the temporary access tracks (haul roads) after construction, as shown in Figure 15 in Appendix C of the oCTMP. This will impact on the operation phase and, more importantly, the decommissioning works. The oDEMP states:

> "To summarise, the main access for all HGVs and most staff will be from the B645 into East Park Site D. The decommissioning traffic route will mirror the construction phase strategy, using an internal temporary access road to connect sites and minimise use of public highways, specifically avoiding Moor Road and Great Staughton village."

This infers that the haul roads would be reinstated for the decommissioning works.

[4] Department for Transport, Road Traffic in Great Britain: https://roadtraffic.dft.gov.uk/

Traffic volumes are projected to grow over the 40-year period, resulting in greater potential for more personal injury accidents. According to Table 6.2 in the Transport Assessment, traffic volumes are anticipated to increase by up to 5% in the period 2022–2028, and growth will continue. Longer-term increases in traffic are also likely to have implications during replacement campaigns and the decommissioning phase at the end of the project's operational life, when additional heavy vehicle movements and associated road safety impacts may arise.

3.1(iii) Potential omission of cumulative impact and new traffic category

SEPE notes that the Transport Assessment and Cumulative Impacts Assessment do not appear to consider the increased traffic generated for construction works for the expansion, rebuild or provision of a new Eaton Socon substation, nor water tanker movements (see section 4).

3.2 Traffic volumes – transparency and confidence in calculations

As set out above, one of the SEPE Deadline 2 submissions once more raised concerns over the apparent lack of lifecycle traffic impact assessment.

Focusing solely on construction programme traffic, the SEPE WR presented modelling for one element of the construction programme to highlight a potential inconsistency between the stated construction materials requirements and the headline construction traffic totals. The sample exercise and commentary are reproduced here for ease of reference:

> "A review of the Applicant's stated construction materials requirements indicates an internal inconsistency that materially affects the reliability of the Transport Assessment.
>
> The Environmental Statement states that construction would require 60,000m³ of aggregates for internal tracks and compounds. Using the Applicant's stated/assumed vehicle type (32-tonne tippers) and a typical payload assumption of c. 20 tonnes per load, the aggregates requirement alone implies the following:
>
> – Aggregate mass: 60,000 m³ × 1.6 t/m³ = 96,000 tonnes
> – One-way loads: 96,000 ÷ 20 = 4,800 HGV loads
> – Two-way movements: 4,800 × 2 = 9,600 two-way HGV movements
>
> The Transport Assessment elsewhere presents a headline construction traffic total of 12,136 two-way HGV/LGV movements across the construction programme (covering all deliveries and construction traffic categories). On a simple order-of-magnitude reconciliation using the Applicant's own stated quantities and typical payload assumptions, aggregate imports alone account for approximately 9,600 two-way movements, leaving implausibly little residual capacity for:
>
> - PV modules and frames;
> - cabling and ducting;

- BESS containers and electrical plant;
- transformers and substation components;
- concrete and civils;
- fencing and security infrastructure;
- waste and spoil movements; and
- construction support logistics.

Further, the Applicant identifies additional delivery streams which, when combined with aggregates, exceed the headline total before other material categories are counted.

For example, if the TA's stated PV panel delivery movements are included (as reported in the ES/TA), then aggregates + PV deliveries alone reach or exceed the Applicant's overall construction movement total, prior to concrete, BESS, transformers, fencing, waste and other traffic.

This inconsistency is material because the Transport Assessment's conclusions on:

- daily and peak distribution of traffic;
- junction capacity and queue impacts;
- routing impacts and diversion risk;
- noise and air quality effects;
- community/PRoW impacts; and
- lifecycle carbon assessment

are all dependent on the accuracy of input HGV totals and temporal profiles.

Even allowing for potential backhaul efficiencies, partial loads, or alternative aggregate densities, the order-of-magnitude comparison remains materially inconsistent.

The Applicant has not provided a transparent construction logistics reconciliation linking module quantities, packaging assumptions (modules per pallet/container), delivery vehicle types, and installation programme sequencing to the headline two-way HGV totals presented in the Transport Assessment. In the absence of such reconciliation, it is not possible to verify whether PV module delivery movements are fully and accurately captured within the assessed construction traffic envelope or whether peak delivery intensity has been materially understated.

This reconciliation gap undermines confidence in the robustness of the construction traffic assessment and directly affects the reliability of junction modelling, routine analysis and amenity impact conclusions."

The Applicant's response does not engage with this detailed point within the body of the SEPE WR, and instead seeks to dismiss it via SEPE's Appendix M table of 'procedural deficiencies' with the following comment:

"The trip generation forecasts used in the assessment have been accepted

by the relevant Local Highway Authorities and National Highways as being robust and acceptable for use in assessing the potential impacts of the Scheme."

However, SEPE notes the Bedford Borough Council Statement of Common Ground states that the following matter is listed as still 'under discussion':

"The baseline data for the assessment of traffic and transport impacts."

The SoCG also states:

"BBC will revert on this matter following review."

The National Highways SoCG suggests the authority still has some concerns about the matter, stating that the following is still 'under discussion':

"The conclusions in respect of the assessment of traffic and transport impacts and effects."

Additionally, the Cambridgeshire County Council SoCG states that some traffic and transport matters are also still under discussion, for example:

"CCC considers that the conclusions of the assessment of traffic and transport impacts are likely to be acceptable, but requires further detailed consideration of the mitigation measures as set out above and how these are secured through the draft DCO."

"CCC has raised a number of concerns or points of clarity in relation to the mitigation of impacts, including further detail and commitments on visibility splays, access design, junction mitigation, staff travel/minibus provision, monitoring and highway authority approvals."

SEPE's sample exercise modelling the Scheme's aggregates requirement, set out in the SEPE WR and reproduced above, suggests there may be a material lack of transparency and internal reconciliation within the Applicant's construction traffic assessment. This is potentially significant given the sensitivity and limited capacity of the surrounding rural road network, where even modest underestimation of HGV and other project-related traffic volumes could materially affect routing, junction performance, amenity and highway safety impacts. The issue is also directly relevant to the robustness of the Scheme's wider lifecycle carbon calculations, since traffic movements form an integral component of embedded and transport-related emissions (see section 4).

Note: SEPE is currently undertaking a quantitative lifecycle transport analysis, the scope and level of detail of which remain under review. It is anticipated that further analysis may be submitted at a future Examination deadline.

3.3 Construction traffic control measures and lifecycle replacement/maintenance activities

SEPE notes that a number of the construction traffic controls proposed within its draft Requirements, set out in the SEPE WR, do not presently appear to be expressly secured within either the dDCO Requirements or the current oCTMP drafting, including for example:

- defined no-go/no-through route restrictions through sensitive villages and constrained rural roads;
- enforceable HGV routing controls;
- school-hour and peak-hour movement restrictions;
- GPS/geofencing or equivalent route compliance mechanisms;
- monitoring and compliance reporting provisions;
- communications strategy and procedures;
- restrictions on construction traffic re-routing during congestion or incidents; and
- clear trigger mechanisms for corrective action where non-compliance occurs.

SEPE submits that these measures are directly relevant to the Applicant's own assessment assumptions regarding construction traffic impacts and community safety. In particular, SEPE requests clarification as to what specific enforceable mechanism would prevent HGV drivers, subcontractors or delivery vehicles from utilising alternative local routes through surrounding villages or constrained rural roads if those routes are not expressly prohibited and controlled within the approved traffic management framework. This applies to the construction, decommissioning and operation phases.

At present, the Applicant's position appears to rely substantially on assumed contractor adherence to management plans rather than clearly secured and independently enforceable controls.

SEPE submits that this distinction is material to the Examination because the environmental assessment itself relies on assumptions regarding routing behaviour, traffic distribution and mitigation compliance which may not be fully secured through the current drafting.

SEPE further notes that matters relating to operational replacement activities remain under discussion between the Applicant and Bedford Borough Council, including the submission of further technical information during the Examination process. In the Bedford Borough Council Draft Statement of Common Ground it states:

> "**12 The scope of the outline Operational Environmental Management Plan**
>
> – BBC has noted that the Replacement Phase is subsumed within this MP and have raised the concern that this should be presented as a

stand-alone Plan for assessment, determination, and to allow for effective enforcement.

– The Applicant acknowledges the matters raised in BBC's relevant representation and is continuing to discuss the matter of replacements. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken, and is preparing a standalone Technical Note providing a consolidated summary of these works, the assessed environmental effects in the ES, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3. The Applicant will remain in discussion with BBC on this matter."

SEPE continues to contend, as set out in its WR, that this issue is material because the traffic and environmental effects associated with major replacement and maintenance activities over a potential 40-year operational period are not yet fully characterised within the Examination material currently before the Examining Authority.

In particular, there remains limited clarity regarding the likely scale and frequency of substantial replacement activities; the distinction between routine maintenance and large-scale replacement campaigns; the likely duration and intensity of such works; associated HGV movements, crane operations and waste handling requirements; and the cumulative interaction of replacement activities with surrounding receptors, villages and transport corridors.

SEPE also notes that, during ISH2, the Applicant indicated that replacement or maintenance activities could potentially affect up to 20% of Scheme components within a single replacement campaign or operational phase.

In the Applicant's 'Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) and Action Points', it states:

> "The outline Operational Environmental Management Plan (OEMP) [APP 157] includes measures relating to traffic and transport, but the number of traffic movements in the operational phase will be much more limited unless there was a particular replacement campaign. Table 2.2 of the outline OEMP sets out the items may require replacement during the lifespan of the development. If it is intended that more than 20% of panels are to be replaced a notification must be submitted to the relevant local planning authority for approval with details of the management measures that are proposed to be put in place for those replacement activities, that are consistent with the principles of the construction environmental management plan (CEMP), public right of way management plan (PRoWMP), construction traffic management plan (CTMP) and OEMP that had been approved for the construction for the Scheme, but are also commensurate to the scale of activity proposed."

In the context of a utility-scale solar development of this scale, SEPE submits that this could potentially involve replacement activity at very substantial scale. SEPE notes that the hearing summary refers to a replacement threshold for solar panels. By way of illustration, if applied to solar panels alone, replacement of up to 20% of installed panels could potentially equate to replacement activity involving in the order of approximately 140,000 panels, together with associated electrical components, transport movements, waste handling and installation activities. This would be considered a 'large' solar scheme in its own right, and up until recent changes to the capacity threshold for NSIPs, would have been classed as NSIP-scale.

Further, a replacement total just below a nominal limit would be similarly at a significant scale. Using the example of solar panels at 19% of installed total would amount to 133,000 panels, again comfortably within the previous NSIP capacity threshold. Frequency of replacement or maintenance regimes is also a material consideration: there would appear to be nothing within the proposed framework to prevent replacement or maintenance campaigns from proceeding sequentially or overlapping in practice, thereby creating the potential for a near-continuous flow of substantial replacement activity over extended periods.

While SEPE does not suggest that such activities would necessarily occur routinely or simultaneously across the entire Scheme, the operational flexibility sought nevertheless has potential relevance to traffic and transport effects; HGV movements; waste handling; construction-type operational activity; and cumulative impacts on surrounding communities and rural road networks over the operational life of the Scheme.

Accordingly, SEPE submits that further clarification would assist the Examination regarding:

- the assumptions underpinning replacement activity scenarios;
- the likely scale and duration of substantial replacement campaigns;
- the extent to which such activities have been assessed within the Environmental Statement; and
- whether the current operational traffic assessment fully captures the potential long-term effects associated with major replacement and lifecycle maintenance activities.

3.4 Cleve Hill construction traffic case study

The Applicant's response to the Cleve Hill Solar Park case study does not appear to engage with the purpose for which the evidence was cited within the SEPE WR. Cleve Hill is the first (and, so far, only) solar NSIP to have been constructed. The case study was detailed to demonstrate that despite DCO Requirements for construction traffic management being broadly adhered to during the Cleve Hill construction programme, the reasonably foreseeable issues identified and articulated by the local rural community during the NSIP process were borne out in reality during a long duration, highly disruptive and damaging construction

programme. The relevance of the case study is therefore predictive and evidential, rather than procedural.

The SEPE WR states:

> "Recent evidence from the Cleve Hill Solar Park NSIP (Kent; DCO granted 2020, construction phase 2023–2025) provides relevant, real-world insight into the performance of construction traffic controls for large rural solar NSIPs. While Cleve Hill is not determinative of outcomes elsewhere, its construction-phase experience is material in illustrating systemic risks associated with poorly designed Construction Traffic Management Plans (CTMPs). This evidence is relied upon not as precedent but as empirical demonstration of implementation risk in comparable rural NSIP construction environments."

The WR goes on to detail a range of substantive limitations associated with the Cleve Hill project in relation to underlying design and logistical assumptions that informed the construction programme itself. The case study includes an example of a remedial measure that had to be introduced during the construction programme in an attempt to ameliorate enduring impacts on the local community.

The Applicant seeks in its response to characterise the case study as related fully to enforcement issues *per se*, while the WR makes it clear that the *design* of the Cleve Hill construction traffic management programme appears to be at fault. In other words, the Cleve Hill example is cited to demonstrate that the construction traffic management design flaws identified by SEPE at East Park are likely to materialise in practice in a similar manner should the East Park DCO include similarly poorly conceived Construction Traffic Management Plan Requirements – albeit on a significantly larger scale, given that East Park is a multi-site project of nearly twice the size with a longer construction programme.

In the absence of any other real-world evidence of how arrangements agreed under a solar DCO operate in practice, SEPE once more draws the experience of the Cleve Hill construction traffic programme, and its impact on the local rural community, to the attention of the Examining Authority.

The East Park proposal contains several comparable characteristics, including:

- extended construction duration;
- substantial HGV movements;
- reliance on rural road corridors;
- reliance on outline management plans;
- phased construction activity;
- reliance on future contractor behaviour; and
- deferred operational detail.

SEPE's position remains that the Cleve Hill experience offers a precedent for construction of solar NSIPs and demonstrates the practical limitations of relying on broad management-plan frameworks and contractor-led mitigation where

construction periods are prolonged, rural road networks are heavily constrained, cumulative impacts interact dynamically during delivery phases, and monitoring and enforcement mechanisms are inherently reactive.

The Applicant's response does not engage with these substantive points.

Relevant Examining Authority questions

Q1.1.2 The applicant. Outline Battery Safety Management Plan [APP-162]. What is the expected cyclical inspection/maintenance regime proposed to ensure the safety of the BESS?

Q1.1.11 The applicant. Planning Statement [APP-031] Maintenance Regime. Paragraph 4.8.2 references routine activities on site during the operational phase of the development. One of these activities is maintenance. Can the applicant supply an outline of how often the cyclical pre-planned maintenance activities will take place.

Q1.1.21 National Grid / The applicant. In National Grid's relevant representation [RR-903], it is stated: "The scope of the expansion, rebuild or provision of a new substation of East Socon Substation is as yet unknown and will be determined by the outcome of NESO's Connection Reforms process. Please provide projected timelines by which this will be determined and the timetable for the expansion, rebuild, or the construction of a new substation . If this coincides with the construction of the proposed development, have the cumulative impacts of the works to East Socon site been considered?

Q1.11.1– Q1.11.7

Specifically:

Q1.11.1 The applicant. Planning Statement [APP-031]. Paragraph 4.7.14 provides details of construction workers. How have average and peak totals been calculated?

Q1.11.3 The applicant and Local Highway Authorities. Outline Construction Traffic Management Plan [REP1-034]. Section 4.5 provides details of Sustainable Travel options for construction workers. It is noted that construction workers 'will be encouraged ' to use or consider sustainable travel measures. I also note references to sustainable transport options being 'promoted' or 'provided' in Table 16.3 of ES Chapter 16: Other Environmental Topics [APP-052]. Given this assumption has been used to inform traffic generation figures, can the applicant consider a regime where construction workers were compelled to use sustainable travel options, such as the drop off/ pick up option outlined in paragraphs 4.5.5 and 4.5.6. How could this be controlled and enforced through a Requirement to ensure traffic volumes do not increase and put pressure on the strategic road network?

Can the Local Highway Authorities comment on the sustainable travel options for the transport of construction workers to the site and could other initiatives be considered?

Q1.11.4 The applicant. HGVs. Paragraph 7.11.17 of the Planning Statement [APP-031] discusses the reducing the impact of HGVs travelling to and from the site will be managed to minimise the number of HGVs arriving during the highway peak hours. How will this be enforced and what happens if drivers choose to ignore the measures put in place?

Q1.11.5 The applicant. NH in their RR [RR-904] request that the applicant provides additional explanation concerning the expected impact on the A1 Junction with the B645 during the peak hours to confirm if further assessment (modelling) is required. It is also noted that significant impact occurs just outside the peak hours which could see a shift in the peak hours. The level of impact would ordinarily warrant further analysis of junction performance due to the significant volume of trips presented. Can the applicant update on the progress of providing the additional information and analysis?

Additional relevant questions

1. Can the Applicant explain why personal injury collisions, including fatal incidents, appear to have been omitted from its Transport Assessment, and clarify how the Examining Authority can therefore have confidence that the baseline highway safety assessment fully and accurately reflects conditions along the B645 corridor as well as at the A1/B645 and B645/Moor Road junctions?
2. Given that the Applicant's five-year accident analysis substantially overlaps with the Covid-19 and immediate post-pandemic periods, when traffic patterns and flows were materially atypical, has any sensitivity testing or adjustment been undertaken to determine whether the baseline highway safety assessment may understate likely risks under normalised or future traffic conditions, especially given the projected increases in traffic volumes presented by the Applicant, and growth factors in the National Transport Model?
3. Given SEPE's sample analysis of vehicle movements required for aggregates delivery, can the Applicant provide a transparent construction logistics reconciliation demonstrating how the stated quantities of:
    - aggregates
    - PV modules and frames
    - cabling and ducting
    - BESS containers and electrical plant
    - transformers and substation components
    - concrete and civils
    - fencing and security infrastructure
    - delivery of construction plant/vehicles
    - fuel for construction plant/vehicles
    - trees and shrubs
    - pavement materials for car parks
    - compound offices and welfare facilities
    - waste and spoil movements

- construction support logistics, and
- all other materials, products or equipment associated with the Scheme

translate into the headline HGV/LGV movement totals relied on within the Transport Assessment, including all assumptions regarding payloads, vehicle types, delivery sequencing and backhauling?

4. In light of Statements of Common Ground indicating that aspects of the traffic baseline, transport impacts and mitigation measures remain "under discussion" with relevant authorities, what weight should the Examining Authority place on the Applicant's assertion that the trip generation forecasts and transport conclusions are already "accepted" and "robust"?
5. What specific enforceable mechanisms, secured through the dDCO Requirements or approved management plans, would prevent HGVs, subcontractors and delivery vehicles from deviating onto unsuitable local roads or through sensitive villages during construction, operation, replacement campaigns and decommissioning activities?
6. Can the Applicant clarify the likely scale, duration, frequency and cumulative traffic implications of substantial operational replacement campaigns, including scenarios involving replacement of up to 20% of Scheme components, and explain the extent to which such activities have been assessed within the Environmental Statement and operational traffic modelling?
7. Having regard to the construction-phase experience of the Cleve Hill Solar Park, what assurance can the Applicant provide that reliance on outline management plans, contractor-led compliance and future mitigation detail would be sufficient to avoid comparable prolonged traffic, amenity and highway safety impacts on the constrained rural road network surrounding the proposed Scheme?

4 Lifecycle carbon case

The Applicant's response to the SEPE WR does not appear to adequately address the concerns raised regarding carbon assessment and lifecycle greenhouse-gas (GHG) accounting.

The Applicant's core position appears to be that its GHG assessment was prepared to meet the requirements of the EIA Regulations – rather than to function as a full Lifecycle Carbon Assessment – and that, at the current stage of design, the use of conservative assumptions is sufficient to identify likely significant effects. The Applicant also argues that the assessment has already considered the principal lifecycle issues raised, including supply chains, embodied emissions, equipment replacement, lifecycle boundaries and degradation assumptions.

The Applicant further states that the scope of the assessment was "agreed as part of the consultation process" following the EIA scoping exercise. However, a scoping opinion is not necessarily determinative of the adequacy of the final Environmental Statement, nor does consultation agreement necessarily remove the requirement under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 for the ES to include:

> "the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment"

The Applicant also accepts that "there are limitations" with its assessment at this stage and that key equipment specifications and detailed design information remain unresolved. While EIA is recognised as an iterative process, unresolved design detail does not appear to remove the requirement for the Environmental Statement to contain sufficient information to support a reasoned conclusion on likely significant environmental effects.

Where uncertainty relates to assumptions capable of materially altering the magnitude or significance of lifecycle GHG emissions, the adequacy of the Environmental Statement's assessment methodology becomes directly relevant to whether the Secretary of State can reach a legally compliant reasoned conclusion on the Scheme's likely significant climate effects under Regulations 14 and 21.

The Planning Inspectorate's 'Nationally Significant Infrastructure Projects – Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements' expressly emphasises that the requirement under Regulation 14 is directly linked to the Secretary of State's ability to reach the "reasoned conclusion" required under Regulation 21.

The Regulations additionally require information on:

> "…the likely significant effects of the development on the environment…the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions)…"

As indicated in the SEPE WR, SEPE has undertaken analysis of a selected sample of activities associated with the Scheme. SEPE has further refined these early findings since submission of its WR. This selected range of alternative carbon calculations presented below indicates that a number of the assumptions, emissions factors and methodological choices used by the Applicant may materially understate the Scheme's lifecycle GHG emissions. In particular, the Applicant does not appear to have substantively addressed SEPE's suggestion that materially higher emissions may result from alternative lifecycle assumptions and data sources. This is relevant because the issue is not merely whether the assessment adopts a "conservative" approach in principle, but whether the Environmental Statement contains sufficiently robust and evidence-based information to support a reasoned conclusion on the Scheme's likely significant climate effects under the EIA Regulations.

The Applicant's position appears to be encapsulated in the following statement:

> "The Applicant understands that there are limitations with ES Vol 2 Appendix 15-1 [APP-116] at this stage but would like to emphasise that the assessment has been produced to fulfil the requirements of the EIA Regulations and identify likely significant effects, and is not expected to be a LCA."

4.1 Alternative carbon calculations

SEPE has undertaken an alternative emissions analysis of a selected range of components/activities associated with the Scheme: BESS cells, PV panels and PV framework. More details and provisional sample calculations are set out in Appendix A and the headline totals are set out in Table 1.

Activity	**Emissions (tCO_2e)**
Production (China)	623,104
Production – transport	14,871
Replacement	862,395
Decommissioning – waste	17,961
Decommissioning – waste transport	1,658
Decommissioning – other	4,217
Total	**1,524,206**

Table 1: Alternative calculations for selected sample of GHG emissions associated with the Scheme

In its 'Environmental Statement Volume 2 – Technical Appendices. Appendix 15-1: Greenhouse Gas Emissions Assessment', the Applicant summarises total GHG emissions over the lifetime of the Scheme as:

> "As shown, using the conservative assumptions the total emissions over the lifetime of the Scheme are ~666,000 tCO_2e."

This comparison of alternative assessments of GHG emissions associated with a *sample range* of activities undertaken by SEPE may indicate the potential for lifecycle carbon dioxide emissions to be materially higher than those reflected in the Applicant's *total* assessment of activities.

SEPE notes that examination of GHG emissions associated with grid-scale solar power schemes is precedented in the NSIP regime.

For example:

Cranfield University's assessment of carbon calculations related to the 500MW Sunnica solar power scheme[5] suggested that:

> "1) Sunnica may have overestimated their energy output at 23.5 TWh, unless they are intending an installed capacity of at least 625 MWp.
>
> 2) Sunnica's methodology for calculating GHG (greenhouse gas) emissions throughout the lifecycle stages of the Scheme is not transparent and has led to an underestimation of the lifetime emissions of the scheme."

More recently, the promoter of the Great North Road solar NSIP, Elements Green, corrected its carbon calculations three times during the recently concluded Examination[6]. As an Interested Party, a local community group highlighted mathematical and factual errors, incorrect data, misleading statements, missing materials and unsustainable assumptions in the Applicant's original assessment. The Interested Party's final analysis indicates the project could produce between 1.8 million and 2.6 million tonnes more carbon dioxide than it would save over its lifetime.

4.2 Additional source of carbon emissions and existing accepted errors in Applicant's carbon calculations

The Environment Agency submission at Deadline 2 implies there are likely to be further additions to construction traffic volume (see section 3 of this submission). The Environment Agency outlines new arrangements made by the Applicant following comments from the Environment Agency:

> "Our concern was the Applicants water supply strategy for the proposal. The details provided did not give us with confidence that the water demands of the

[5] Sunnica Energy Farm EN010106: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010106

[6] Great North Road Solar and Biodiversity Park EN010162: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010162

> project were understood and alternative water supply sources were fully considered." [sic]

Following the "satisfactory" resolution of this matter, the Environment Agency further states:

> "Tankering volumes to site will result in additional numbers of HGVs on local roads. This should be reflected in the traffic and transport assessment of the Environmental statement. In order to evaluate how many more HGVs are needed an estimate of volumes and/or number of days is presumably required. If this increase is deemed to be unacceptable, other sources of supply will need to be considered.
>
> It is at the Applicant's risk if contingency is not made for alternative sources of supply and consideration is not made for the limitations and planning required to make them viable for the scheme."

Recent BESS explosions and fires further underline the importance of robust construction-phase contingency planning. According to reports, two of the UK BESS fires in early 2025 occurred during construction/commissioning: the fire at Statera Energy's 300MW/600MWh East Tilbury BESS site in Essex; and the fire at Anesco's 49MW/49MWh Rothienorman BESS site in Aberdeenshire. International examples include the 300MW/450MWh Tesla Megapack facility in Victoria, Australia, which caught fire during commissioning in 2021. In circumstances involving a significant construction or commissioning-stage battery fire, reliance on tankered-in water alone may prove insufficient, further reinforcing the need for credible alternative water supply arrangements and associated traffic impacts to be fully assessed.

Increases in construction traffic will inevitably add to the carbon calculation underestimates suggested by SEPE's preliminary sample analysis.

Further, SEPE notes that the Applicant has acknowledged at least one error within its carbon calculations following examination-stage scrutiny by Interested Parties. While the identified error may be numerically limited in isolation, its significance lies in the wider question of confidence and verification.

Where an assessment intended to demonstrate the climate efficiency and public-benefit case for a nationally significant infrastructure proposal contains acknowledged calculation errors and has been described by the Applicant as having "limitations", the Examination is entitled to consider whether assumptions, inputs or methodological elements may also require clarification or verification.

This is particularly relevant given that:

- construction traffic assumptions remain challenged;
- construction-phase emissions may therefore be understated;
- lifecycle emissions assumptions depend on uncertain replacement and maintenance profiles; and

- operational carbon benefits are themselves linked to uncertain generation assumptions (see section 5).

The Applicant's response does not appear to materially engage with the cumulative significance of those interrelated uncertainties.

Relevant questions

1. The Applicant's assessment relies on assumptions which it describes as "conservative", yet SEPE's partial alternative assessment alone exceeds the Applicant's total whole-scheme figure by a substantial margin. In those circumstances, can the Applicant explain how the Examination can reasonably exclude the possibility that the Scheme's true lifecycle emissions may be materially higher still, and therefore potentially undermine the claimed net climate benefit over the operational lifetime of the development?
2. The Applicant has acknowledged limitations within its assessment and accepted at least one calculation error during the Examination process. In the context of a nationally significant infrastructure proposal where carbon efficiency forms part of the public-interest justification, can the Applicant clarify what independent verification or sensitivity testing has been undertaken to ensure the assessment remains reliable?

5 Capacity factors and the Applicant's projected Scheme power generation

On the issue of capacity factors and likely real-world site performance, the Applicant's response to SEPE appears not to have engaged with the substance of SEPE's WR. While the Applicant's response addresses procedural and policy matters, it does not address in any meaningful technical way SEPE's evidence concerning regional insolation data, cited local solar performance, or the credibility of the scheme's projected electricity generation figures.

SEPE's evidence was relatively specific and evidence-led. Appendix F of the WR explains that analysis of regional insolation data for 2024 and 2025 indicates that a 400MW solar installation would typically have achieved an annualised capacity factor in the range of approximately 9.5–11%. SEPE further noted that the Applicant's projected annual generation of approximately 433.2GWh implies a capacity factor of around 12.4%, materially above both regional and national comparators.

As summarised in Table 2, SEPE's regional insolation analysis indicates that the Applicant's projected generation materially exceeds the levels that would have been achieved under both unusually favourable solar conditions experienced in the record 2025 solar year and more typical 2024 regional conditions. In the table, SEPE introduces DESNZ's national capacity factors for 2025 and 2024 which are also materially below the Applicant's generation projection capacity factor. SEPE therefore continues to assert that the Applicant's assumptions may be inherently optimistic, particularly when assessed against long-term regional irradiance conditions rather than exceptional years.

In Appendix B, SEPE presents part of the evidence put before the Great North Road solar NSIP Examination. Analysis and comparative data contained within an Interested Party submission[7] provides relevant corroborative technical and methodological support for SEPE's concerns regarding the realism of the Applicant's projected generation assumptions and implied capacity factors across comparable solar NSIP schemes. In particular, the submission examines the relationship between PVsyst-derived projections, DESNZ national capacity factors, bifacial panel performance assumptions and observed capacity factors across a range of UK solar projects, while noting that even schemes using bifacial panels and tracking systems may achieve materially lower real-world performance than projected; this is relevant to East Park given that the Scheme proposes conventional fixed-panel solar arrays rather than tracker technology.

In its 'Design Parameters and Principles Statement', the Applicant states:

> "The solar PV panels will be either monofacial or bifacial and have an anti-reflective coating."

[7] Great North Road Solar and Biodiversity Park EN010162: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010162-000887-Full%20version%20NSG7%20v4.pdf

Year/ scenario	Capacity factor basis	Capacity factor	Estimated annual generation for 400MW scheme	Comparison to Applicant's projection	Key observation
Applicant's projected output	Applicant's own modelling assumptions	12.4%	433.2GWh	Baseline projection	**The Applicant's projected annual generation implies a capacity factor significantly above recent regional and national averages**
Record 2025 solar year (sunniest year on record)	SEPE regional insolation data for 2025	11.09%	388.6GWh	10% lower than Applicant's projection	Even under exceptionally favourable solar conditions, projected output is materially below the Applicant's assumptions
DESNZ's national capacity factor 2025		11.2%	392.4GWh	9.4% lower than Applicant's projection	National 2025 data similarly indicates generation materially below the Applicant's forecast, despite exceptionally favourable solar conditions nationally
2024 regional conditions	SEPE regional insolation data for 2024	9.88%	346.2GWh	More than 20% lower than Applicant's projection	Generation under more typical regional conditions substantially below the Applicant's forecast
DESNZ's national capacity factor 2024		9.4%	329.4GWh	24% lower than Applicant's projection	The Applicant's projection appears materially above both regional and national data associated with more typical solar conditions

Table 2: Comparison of the Applicant's projected annual generation against regional and national[8] solar capacity factors for 2024 and 2025

[8] Department for Energy Security and Net Zero, Energy Trends: UK renewables, Renewable electricity capacity and generation (ET 6.1 – quarterly): https://www.gov.uk/government/statistics/energy-trends-section-6-renewables

However, in its 'Environmental Statement Volume 2 – Technical Appendices, Appendix 15-1: Greenhouse Gas Emissions Assessment', the Applicant states "bifacial module" under Table 3 – Equipment weight assumptions, 'Solar PV module'.

SEPE notes that caution is required in relation to projected bifacial panel performance assumptions within UK solar NSIP-scale schemes. Evidence submitted during the Great North Road Examination and cited above has highlighted that modelled bifacial gain assumptions may rely on optimistic assumptions regarding albedo, panel spacing, layout efficiency and long-term operating conditions. Typical albedo values for grassed agricultural land are lower than more reflective bare-earth or artificial surfaces. SEPE also notes that the only apparently identified UK field study[9], cited in the evidence referred to above, examined bifacial panel performance at a solar site with an installed capacity of 34.7MW and featuring a "ground surface, covered with thick soil" which "played a vital role in determining the albedo", limiting the extent to which such evidence can confidently be extrapolated to the East Park Scheme's proposed design and operational assumptions. The York study also found that bifacial panels had a marginally higher degradation rate per annum.

In addition, the SEPE WR cited local operational evidence. Presentation of recorded capacity factors for the first two full years of operation at the Manor Farm solar power site, which directly borders the East Park scheme, showed that it under-performed 10–15% below the national averages for those years. This evidence supports the wider point that real-world solar performance in this locality may differ materially from modelled assumptions.

Against this evidential background, the Applicant's response does not provide:

- revised generation modelling;
- explanation of capacity-factor assumptions;
- sensitivity testing against lower irradiance years;
- comparison with observed regional performance; or
- any substantive rebuttal of SEPE's analysis regarding likely operational output.

This omission is important because the planning balance advanced by the Applicant relies heavily on asserted public benefits arising from renewable electricity generation and carbon displacement. If projected generation figures may be materially optimistic, then the claimed public benefits may also be overstated. SEPE expressly raised this concern within its proportionality and need case, contending that the Examination had not yet been provided with sufficient evidence to evaluate whether the proposal represents an efficient contribution to national decarbonisation objectives relative to the scale of land-take and environmental harm.

The issue becomes particularly significant given the scale of Best and Most Versatile (BMV) land affected by the proposal. Where a scheme proposes the long-term

[9] 'A comparative study of bifacial versus monofacial PV systems at the UK's largest solar plant', Badran & Dhimish (2024), *Clean Energy*, Volume 8, Issue 4. Oxford University Press

change in land use of a nationally significant agricultural resource for more than forty years, the credibility and robustness of the claimed generation benefits become central to the planning balance. If actual operational performance at East Park may be materially lower than the Applicant's projection, then the justification for the loss of such a substantial area of high-quality agricultural land may be correspondingly weakened.

Note: SEPE is currently undertaking analysis of emissions savings across the lifecycle of the Scheme, the scope and level of detail of which remain under review. It is anticipated that further analysis may be submitted at a future Examination deadline.

Relevant Examining Authority question
Q1.7.2 The applicant. Planning Statement [APP-031]. Paragraph 2.6.10 suggests that the proposed development could theoretically supply almost half all electricity that BCC and HDC collectively consume but source from non-renewable generation. Could the applicant provide some calculations and further evidence to support the claim made?

Relevant questions

1. Given the highly intermittent and seasonally variable nature of UK solar generation identified in publicly available DESNZ and National Energy System Operator data, can the Applicant clarify whether the statement that the Scheme could supply "almost half" of the non-renewable electricity consumed within BCC and HDC refers only to an aggregated annualised energy calculation rather than any continuous or real-time supply capability, and whether the claim assumes the "Scheme" contribution comprises electricity generated directly by the solar arrays alone rather than electricity imported from and re-exported to the grid via the proposed BESS?
2. Can the Applicant provide an hourly and seasonal breakdown, or equivalent modelling, demonstrating the extent to which the Scheme's projected generation profile aligns with actual electricity demand patterns across BCC and HDC, particularly during autumn and winter periods and evening peak demand when solar generation is limited or absent, and distinguishing between direct solar generation and any electricity discharged from the proposed BESS?

Additional relevant questions

1. Can the Applicant explain, with supporting calculations and irradiance assumptions, how the projected annual generation figure of approximately 433.2GWh has been derived, given that this appears to imply a capacity factor materially above both local and regional performance and typical UK ground-mounted solar averages?
2. Has the Applicant undertaken any sensitivity testing using lower irradiance or average long-term meteorological conditions and, if so, what annual generation outputs and capacity factors result from those scenarios?

3. What consideration has the Applicant given to observed operational performance at nearby solar installations, including the Manor Farm solar site adjacent to the proposed Scheme?
4. In the event that actual operational generation were materially lower than the figures presently relied on by the Applicant, what assessment has been undertaken of the consequential effect on the Scheme's claimed carbon savings and the overall planning balance, particularly in relation to the extent of BMV agricultural land affected?

6 Crime, security infrastructure and rural community impact

The SEPE WR states:

> "Recent national evidence appears to indicate that utility-scale solar developments are now a routine target for organised acquisitive crime, particularly theft of copper cabling, inverters and associated electrical plant. …
>
> [incidents are] part of an established pattern of repeat targeting, hostile reconnaissance and asset stripping across rural solar sites.
>
> These trends are directly relevant to the East Park Energy proposal, which comprises a large, highly dispersed solar development extending over approximately 773 ha, with extensive underground and surface cabling, multiple compounds, and a high-value BESS installation. The physical characteristics of the scheme, long perimeter lengths, fragmented parcels, rural access routes, and concentration of copper-rich assets, create a credible and foreseeable risk of theft, reconnaissance and attempted breach, particularly during construction but also throughout operation."

It goes on to set out four principal concerns: the potential for escalated security measures over time; crime risk as evidence of wider amenity, well-being and community safety impacts; elevated safety and security risk at the BESS compound; and the potential for further disruption and delay during construction. For ease of reference, these four concerns, and how SEPE suggests they relate to the EIA Regulations and EN-1, are set out in full here:

> "The Environmental Statement contains no assessment of construction-phase or operational security risk, hostile reconnaissance, or the potential displacement of organised crime into surrounding rural parishes. That omission is material for several interrelated planning reasons.
>
> First, experience from comparable sites shows that where theft risk materialises, operators typically respond by escalating security measures over time: reinforced fencing, rapid-deploy CCTV towers, alarms, regular patrols and, critically, expanded night-time lighting. Such measures can fundamentally alter rural character, erode established dark-sky conditions, and introduce continuous illumination and activity into landscapes previously characterised by tranquillity. If the operational reality of East Park requires materially greater security infrastructure than currently assessed, then the LVIA, ecology and amenity conclusions are likely to understate long-term effects.
>
> Secondly, and consistent with the analysis in Section 9.1.2, crime risk is relevant not as a proxy for property value compensation, but as evidence of wider amenity, well-being and community safety impacts. Fear of crime, disturbance from alarms and patrols, loss of perceived safety on rural lanes and Public Rights of Way, and anxiety associated with repeated incidents are

all capable of affecting residential amenity and mental well-being. These impacts fall squarely within the EIA Regulations requirement to assess effects on “population and human health”, and within EN-1’s consideration of community safety and amenity. The absence of any baseline or scenario assessment means these pathways have not been examined or mitigated.

Thirdly, the presence of a BESS compound materially elevates the significance of unauthorised access. Perimeter breaches are not merely a property-crime issue but can interact with safety and accident risk: deliberate damage, ignition sources, interference with systems, or obstruction of emergency access. These risks require integrated consideration alongside other hazard pathways, rather than being assumed away.

Fourthly, theft and attempted theft during construction can generate unplanned vehicle movements, police call-outs, emergency access and construction delays, undermining traffic and construction-management assumptions and increasing disturbance to nearby communities. Published evidence shows that solar sites are being targeted repeatedly and opportunistically, meaning these impacts are reasonably foreseeable rather than speculative.

From a procedural and legal perspective, the absence of any security or crime-risk appraisal leaves a gap in the assessment of population, community safety and human-health effects. Given the availability of recent UK evidence demonstrating widespread solar-site theft and repeat targeting, these impact pathways can reasonably be foreseen. Their omission therefore raises a material concern as to whether the Environmental Statement provides the information reasonably required to enable a fully “reasoned conclusion” on likely significant effects, particularly where mitigation (lighting, surveillance infrastructure, patrol regimes and fencing) may itself generate additional landscape, ecological, amenity and carbon impacts.”

However, in responding only to the necessarily abbreviated Appendix M ‘procedural deficiency and evidence gap’ points in the SEPE WR, the Applicant’s response does not engage with the more detailed concerns set out above and instead attempts to reframe and dismiss concerns as not being relevant to the ES.

SEPE notes that to date, only one NSIP-scale solar complex has so far been constructed (the solar power component of Cleve Hill went into operation in mid 2025). Available national data from Opal, the Serious Organised Acquisitive Crime national intelligence unit, therefore relates to smaller scale sites. SEPE here presents data on solar power site crime, according to Opal (Figure 2).

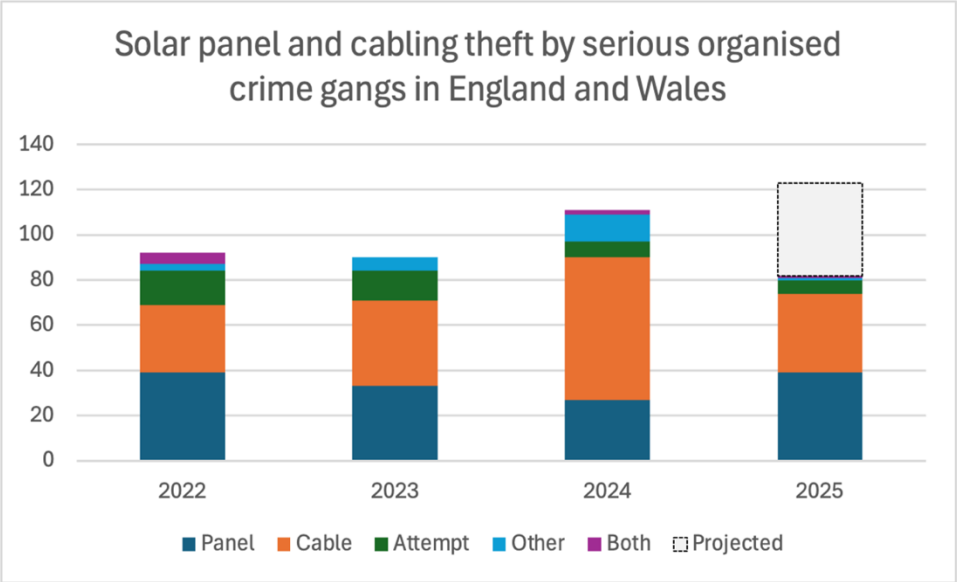

Figure 2: Solar panel and cabling theft by serious organised crime gangs. 2025 shows data up to the end of August, with crimes/incidents for remainder of year projected. 'Attempt' includes unsuccessful thefts and any related damage, and surveillance categorised as offender hostile reconnaissance or suspicious vehicles. Source: Opal – Serious Organised Acquisitive Crime national intelligence unit/Metal & Infrastructure Crime

The Cleve Hill project also offers evidence of additional security measures introduced post DCO. High-intensity floodlighting had to be installed as illustrated in Figure 3.

Figure 3: According to residents local to the Cleve Hill solar NSIP complex, new floodlighting was introduced during the construction programme following unreported criminal activity at the site. Residents raised concerns about the intrusive lighting from miles away from the development. High-intensity security floodlighting does not feature on the face of the DCO. Images supplied by resident local to Cleve Hill complex in Kent, April 2025

Given both national data on serious organised acquisitive crime associated with ground-mounted solar sites, evidence from the Cleve Hill solar NSIP, and the four related principal concerns set out in the SEPE WR, SEPE contends that it is not appropriate for the Applicant to attempt to dismiss concerns set out in its WR on

criminal gang targeting of rural solar sites, and suggests that this is an area which warrants continued scrutiny under the Examination.

Relevant Examining Authority question

Q1.1.10 The applicant. Designing Out Crime. Has the scheme been subject to engagement with the Police and Designing Out Crime Officer. If so, what were the recommendations?

Additional relevant questions

1. What assessment has the Applicant undertaken of whether theft risk could require additional fencing, CCTV, patrols, alarms or night-time lighting over time, and how would those measures affect landscape, ecology, dark skies and residential amenity?
2. Has the Applicant assessed fear of crime, disturbance from alarms or patrols, and reduced perceived safety on rural lanes and PRoWs as potential effects on population and human health?
3. How has the Applicant assessed the particular risks arising from unauthorised access or criminal damage at the BESS compound, including fire risk, system interference and obstruction of emergency access?
4. Has the Applicant assessed how theft or attempted theft during construction could affect traffic assumptions, emergency access, police attendance, programme delay and disturbance to nearby communities?

7 Funding, restoration and long-term deliverability

In its response to the SEPE WR, the Applicant appears to argue that the law only requires a Funding Statement sufficient for compulsory acquisition purposes; future project finance would fund the scheme including decommissioning; Requirement 18 of the DCO legally obliges restoration and decommissioning; and this approach is standard and precedented in NSIP practice.

It does not appear to provide any concrete long-term secured funding mechanism specifically guaranteeing restoration liabilities many decades into the future.

The Applicant states in its response to SEPE's concerns over a lack of ring-fenced funding for restoration of post-development agricultural land:

> "The Applicant considers that this is unnecessary given the inclusion of requirement 18 (decommissioning and restoration) in the draft DCO [REP1-005], which will secure a legally binding obligation to decommission the site."

The Applicant confirms that the intention of article 48 is to ensure that a guarantee or alternative security is in place to cover liabilities associated with compulsory acquisition before the relevant powers included in the draft DCO are exercised:

> "The provision is therefore not relevant to decommissioning and restoration, which is instead covered by requirement 18 (decommissioning and restoration) of the draft DCO."

In the following statement it makes clear its reliance on future financing rather than secured funds:

> "Brockwell Energy would consult with a variety of financial institutions and its investors to enable the construction, operation and decommissioning of the proposed development."

SEPE notes that the Applicant has previously relied on the existence of legal obligations within the dDCO as the basis for concluding that future restoration and decommissioning activities would be adequately secured.

SEPE does not dispute that compliance with the dDCO would constitute a legal obligation. However, SEPE submits that the existence of a legal obligation does not, in itself, necessarily demonstrate that sufficient financial resources would be available to discharge those obligations at the relevant time, particularly where the operational lifecycle of the Proposed Development may extend over several decades; ownership structures, operators and financing arrangements may materially evolve over time; and the detailed scope, methodology and cost of decommissioning activities are themselves substantially deferred until a relatively late stage in the lifecycle of the Scheme.

In those circumstances, SEPE contends that the Examination presently contains limited information regarding the practical mechanism through which long-term decommissioning, infrastructure removal and land restoration liabilities are intended to remain financially deliverable in practice.

This is particularly relevant given that substantial decommissioning and restoration obligations may arise within a comparatively short timeframe following cessation of operation, potentially requiring significant capital expenditure at a point when future project revenues, ownership structures and financial arrangements cannot presently be known with certainty.

SEPE further notes that concerns regarding the absence of any secured or ring-fenced decommissioning funding mechanism were discussed during Issue Specific Hearing 1 ('Issue Specific Hearing 1, on (ISH1) – Part 1, Hearing Transcript'). The Applicant's senior legal representative acknowledged that no dedicated remediation or restoration fund presently exists and instead suggested that some "comfort" could be taken from the likelihood that landowners would wish to see the land restored at the end of the Scheme's operational life.

SEPE submits that these comments are material because they appear to confirm that the current approach relies primarily on future compliance with legal obligations under the dDCO, rather than any identified secured financial mechanism capable of guaranteeing that sufficient resources would remain available to fund decommissioning, infrastructure removal and land restoration several decades into the future. The ISH1 exchange also highlighted the potential risk that liability could ultimately fall on landowners or public authorities in circumstances where future operating entities no longer exist or lack the financial capacity to discharge those obligations.

Relevant questions

1. What is the Applicant's intended approach to ensuring long-term financial deliverability of restoration and decommissioning obligations?
2. Is any form of lifecycle financial assurance, parent company support or shareholder backing anticipated in relation to those obligations?
3. How does the Applicant consider that long-term decommissioning and restoration liabilities would remain practically deliverable throughout the operational lifecycle of the Scheme?

8 Ecology and nature conservation

Significant concerns remain regarding the adequacy of the ecological baseline, the assessment of species and habitat impacts, and the Applicant's treatment of ecosystem functioning and cumulative ecological effects across the development area.

8.1 Uncertainty over aspects of the ecological baseline and subsequent assessment of specific environmental impacts

SEPE reiterates that the impacts of the Scheme broadly relate to:

- habitat destruction;
- habitat fragmentation;
- loss of species;
- potential colonisation and/or spread of non-native species;
- cumulative effects of these impacts with other projects such as proximate solar, BESS and NSIP schemes; and
- in-combination or intra-project effects.

All of these may represent significant adverse residual long-term impacts on biodiversity and nature conservation; that is, even with mitigation measures in place.

While individual, discrete habitats have been referred to, and impacts of the Scheme, to some degree, assessed, overall habitat loss on this scale is irreversible due to the large land-take of the Scheme. The whole of the Scheme's area is important for ecosystem functioning, including habitat for fauna; for example, in the case of skylark, which need a large area for singing and displaying. They are not currently confined to 'skylark plots', as is the planned mitigation under the Scheme. It should be noted that mobile species do not recognise boundaries.

The loss of habitat mosaics is significant. Habitat mosaics, different habitats occurring both spatially and temporally, are important for all species (flora and fauna), for example, in terms of interrelated food webs. These cannot be re-created if the main area of the Scheme is covered by solar panels and related infrastructure.

In general, disturbance effects to all species, including plants, mammals, birds, amphibians and reptiles and invertebrates, from both preparation of the site (including clearance), and construction of the Scheme, have been underestimated.

In some cases, the ecological survey coverage (area, timings, species) has been inadequate to fully assess the impacts on all habitats and species affected by the Scheme. These aspects are likely to have under-recorded habitats and species, and therefore, led to a lower number of adverse impacts being identified.

8.2 'Statement of Common Ground (Draft) between the Applicant and Environment Agency'

SEPE questions how the Applicant will address the Environment Agency's concerns with respect to otter surveys and potential disturbance of this protected species.

The Applicant reports that the oCEMP:

> "includes for a pre-construction survey to identify otter holts".

SEPE notes that the Applicant makes no reference to their large territories of 20–30km[10], which mean that otter are likely to be moving over a far larger area than currently identified by the Applicant, and therefore, the impacts of the development may be wider. SEPE considers that otter surveys should be undertaken in advance of any site work.

8.3 'Statement of Common Ground (Draft) between the Applicant and Natural England'

SEPE does not entirely concur with Natural England's agreement with the Applicant's conclusions of 'ES Vol 1 Chapter 7 Ecology and Nature Conservation', in relation to the assessment of 'protected species' and 'other valuable and sensitive habitats and species'. Further detail is provided later in this section.

8.4 'Applicant Response to Stop East Park Energy'

SEPE considers that important gaps may remain in the ecological data and assessment presented by the Applicant, particularly in relation to ecosystem functioning, protected species, invertebrates, farmland birds, hedgerows and Biodiversity Net Gain. In SEPE's view, these matters may affect the robustness of the assessment of likely significant effects and the appropriateness of proposed mitigation measures.

3.2.7. SEPE challenges the Applicant's claim that it does not need to:

> "…provide comprehensive information on all conceivable environmental matters, irrespective of whether those matters are likely to generate significant effects, or are capable of influencing the reasoned conclusion".

As stated previously by SEPE, the development area functions as an ecological 'whole', in which ponds, ditches, hedgerows, trees and open fields operate as interconnected components of a wider ecosystem. Most species will not be confined to one habitat type. At the same time, not all species are entirely mobile and able to find other suitable habitats. Impacts on one habitat or species may generate indirect or cumulative effects across the wider ecological network.

[10] UK Wild Otter Trust: https://ukwildottertrust.org

Consequently, SEPE contends that it is not sufficient for the Applicant to consider environmental effects in isolation or to dismiss matters on the basis that they are not considered individually significant at first instance. A decline in beetle, earthworm and caterpillar populations, for example, may detrimentally affect hedgehogs and predators higher within the food chain, such as badgers, demonstrating how apparently limited impacts can produce wider ecological consequences.

3.2.9 and 3.2.11. Scoping out bat populations by the Applicant (in and around Swineshead Wood Site of Special Scientific Interest, which is of note for several bat species, some of which have conservation status) is considered inadequate by SEPE. Bats are protected species under the relevant legal frameworks.

In the wider context of the overall development area, SEPE notes that there is a question from the Examining Authority in relation to bat flight paths. SEPE also notes that different bat species feed on different invertebrates, including moths, midges, gnats and mayflies, so it is also important to understand the location or potential locations of various invertebrates within the wider ecosystem. Failure to do this could lead to impacts on bats in relation to the loss of foraging routes and effects on feeding.

Likewise, the Applicant has not undertaken a beetle survey (see above, in relation to food sources for other fauna). A number of rare beetles in the UK are associated with ponds and ditches on agricultural land and hence this is a gap in the ecological baseline provided by the Applicant.

Applicant's response to Procedural Deficiency table set out in SEPE's WR

11A Ecology. SEPE's comments stand as it contends that it is not possible to determine an ecological impact without adequate data. The importance of ecosystem functioning is highlighted above due to the fact that species and habitats are interrelated, both directly, such as through feeding relationships, and indirectly, such as with respect to predation.

11B Farmland bird importance and territory mapping. SEPE reiterates that the entire development area is important for a wide range of birds, including those of higher conservation importance. Indeed, agricultural land can support a wide range of fauna and flora.

SEPE suggests that mitigation for other ground-nesting birds should be considered alongside skylark-specific mitigation to maximise gains for birds overall.

The Applicant states:

> "Research undertaken by the RSPB and Natural England has found that well managed UK solar farms can significantly boost both bird abundance and species richness…"

The Applicant does not cite specific studies. SEPE suggests that one of the papers it is referring to may be a study by the University of Cambridge, in association with the RSPB, on bird populations on six small-scale solar farms in the East Anglian Fens[11]. SEPE notes that its findings may not readily be extrapolated to significantly larger transmission-scale solar power schemes. The study findings are complex and qualified. For example, the paper states:

> "…care should be taken when siting solar farms on high grade farmland…"
>
> "…careful planning is needed to ensure solar farms are sited in suitable areas, if managed with biodiversity in mind then their impact can be beneficial…"
>
> "…simple habitat solar farms apparently offered only marginally greater structural diversity than arable fields…"
>
> "Solar farms have been shown to negatively affect the activity of bats … studies focused on solar sites that were situated on grassland that was grazed or mown…"

11C Red kite collision and disturbance risk. SEPE's comments stand with respect to potential collision, disturbance and displacement risks. The impacts should be assessed and mitigation measures included in the Construction Environmental Management Plan.

11D Precautionary assessment under NEER012 Framework. SEPE considers that observations of invertebrates were undertaken at a general level as part of the wider habitat survey of the development area. At present, it is not possible for the Applicant to state that there will be benefits for the invertebrate assemblage within the development site or the surrounding area.

Specific, baseline invertebrate surveys, such as for flying and ground invertebrates, would allow better assessment of impacts, particularly in relation to bird and bat feeding.

11E Grid connection. SEPE states that the grid connection is an integral component of the authorised development. Gaps in the ecological baseline and impact assessment may not enable the Examining Authority to determine the likely significant effects of the development. This has implications for the targeting of site-specific mitigation measures.

11G Hedgerow Regulations consent strategy. SEPE's comments stand, on the basis that hedgerows are important for the overall ecological functioning of the development site, being refuges and potential refuges for invertebrates, badgers, hedgehogs and other fauna and flora.

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[11] 'Solar farm management influences breeding bird responses in an arable-dominated landscape', Copping *et al.* (2025), *Bird Study*, Volume 72, Issue 3. Taylor & Francis

One issue is that replacement hedgerows cannot replicate the ecological value of established hedgerows. In particular, newly planted hedgerows do not provide equivalent shelter, connectivity or foraging opportunities for larger mammals and other species dependent on mature hedgerow habitats.

11H Biodiversity Net Gain. SEPE's comments remain relevant in the context of the development and the regional ecological importance of the development site.

Relevant Examining Authority questions
Q1.3.1– Q1.3.16

Specifically:

Q1.3.2 HDC. BNG Monitoring. Please outline any comments on the use of a Planning Performance Agreement to facilitate the resourcing of BNG monitoring in lieu of a S106 agreement.

Q1.3.4 The applicant. Planning Statement [APP-031]. Paragraph 7.6.52 summarises that the extent and quality of priority habitats within the site will be enhanced, resulting in a moderate beneficial effect on a receptor of medium value that is significant. Which receptor is this?

Q1.3.6 The applicant. Hazel Dormouse. Paragraph 7.6.113 of the Planning Statement [APP-031] indicates that the Hazel Dormouse is likely to be absent from the site. Have any surveys been undertaken to support this and where can they be found?

Q1.3.8 Natural England. Biodiversity Net Gain Report [APP-168]. Please confirm that you are content with the Biodiversity Net Gain report and the metric used

Q1.3.10 The applicant. Outline Landscape Environmental Management Plan [REP1-040]. Paragraph 8.2.1 states that ecological monitoring will take place for at least 30 years. Can the applicant explain in what circumstances the monitoring would be extended in length?

Q1.3.11 The applicant. Outline Landscape Environmental Management Plan [REP1-040]. Paragraph 2.6.23 refers to passerines and Corvidae. Is it possible to be more precise, as this refers to almost half of all bird species?

Q1.3.12 Natural England. Natural England's Relevant Representation [AS-023] Bat Flight paths. In your RR dated the 14 January 2026, you encourage the applicant to use a more precautionary buffer zone and extend this from 6m to 10 m and ensure the buffers are along prominent bat flight paths. NE also seeks further discussion on potential bat mitigation. Please outline what further discussions have been had on this issue and can you provide your response to the applicant's response [REP1-055] to your advice on bat flight paths and is the applicant's approach sufficient?

Q1.3.13 Natural England Cambridgeshire County Council Huntingdon District Council. Baseline ecological survey coverage. Are NE, CCC and HDC satisfied with the coverage of the ecological surveys undertaken to inform the baseline conditions of the ecology and nature conservation assessment within the ES [APP-043]?

Q1.3.14 The applicant. Priority Habitats. Section 3.2 of ES Appendix 7-1: Ecological Baseline Report [REP1-024] identifies the presence of Priority Habitats on site. Please provide estimates of the volumes of each habitat type.

Q1.3.15 The applicant. Priority Habitats. Please provide a Habitats of Principal Importance Plan.

Q1.3.16 The applicant. Short Term Minor Adverse Effects. At paragraph 7.12.2 of ES Chapter 7: Ecology and Nature Conservation [APP-043] it concludes that 'During the construction phase the Scheme would result in short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage, amphibians (including great crested newt) and otter.' For clarity, can the applicant confirm whether the short term and temporary minor adverse effects are reversible?

Additional relevant questions

1. To what extent has the Applicant assessed the cumulative ecological impacts of this development in relation to other proposed solar power sites, BESS facilities, and NSIP projects within the wider area, particularly in relation to habitat connectivity and species displacement?
2. Given the acknowledged uncertainty and gaps in baseline ecological data, how can the Examining Authority be satisfied that the mitigation hierarchy has been properly applied and that significant adverse effects on protected and priority species have been fully identified and addressed?
3. What evidence can the Applicant provide to demonstrate that proposed habitat creation and Biodiversity Net Gain measures will replicate not only habitat area, but also the ecological functionality, complexity and long-term resilience of the existing habitat mosaics currently present across the development area?
4. How will Biodiversity Net Gain be 'translated' into real biodiversity gains?
5. How can the Applicant ensure adequate environmental monitoring and management takes place over this large, fragmented development site?

9 Relationship of the SEPE submissions to Local Impact Reports and wider Examination evidence

SEPE notes that a number of concerns raised within the Written Representation align materially with issues identified elsewhere within the Examination process, including within Local Impact Reports[12] and submissions from statutory consultees.

The significance of this alignment is that the concerns raised by SEPE are not isolated or speculative observations. Rather, a number of independent participants within the Examination have identified related concerns regarding matters including:

- construction traffic;
- environmental assessment completeness;
- hydrology and drainage;
- BESS safety;
- secured mitigation;
- cumulative impacts;
- operational uncertainty; and
- adequacy of supporting evidence.

This wider evidential context reinforces the central SEPE position that the Examination presently contains multiple unresolved matters affecting decision-stage confidence.

[12] Stop East Park Energy's Comments on the LIRs: For the attention of the Examining Authority: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010141-000628-Comments%20on%20the%20LIRs%20-%20For%20the%20attention%20of%20the%20Examining%20Authority.pdf

10 A note on the Stop East Park Energy Written Representation and the Applicant's response to the SEPE WR

SEPE notes at the outset that community groups participating as Interested Parties do not have the same procedural access, technical engagement or pre-application dialogue available to statutory consultees, local authorities or parties operating through Statements of Common Ground. The opportunity for community-led groups to review and challenge evolving technical material is therefore materially more constrained both in scope and available time.

Against that background, the Applicant's response does not materially displace the substance of SEPE's WR. The response focuses heavily on selected points within Appendix M, despite Appendix M being intended as a cross-reference schedule supporting the substantive analysis contained throughout the wider WR. A significant number of planning, environmental and procedural concerns raised in the main body of the WR therefore remain either unanswered or only partially addressed.

In several instances, the Applicant's response appears to attempt to narrow or reframe SEPE's concerns into more limited propositions than those actually advanced. As a result, important issues remain contested and unresolved.

The Applicant's criticisms regarding references and legal authorities are expressed without demonstrating that the principal conclusions of the Written Representation are unsound. While the Applicant identifies citation irregularities and disputes aspects of SEPE's interpretation of certain authorities, this does not negate the underlying substance of the planning and procedural issues raised or the evidence presented within the WR. In the context of a lengthy voluntary community submission totalling nearly 600 pages, referencing inaccuracies are unsurprising and do not materially diminish the substance of the planning harms identified.

SEPE is a small, unfunded voluntary community group operating without the resources available to the Applicant or statutory consultees. The WR was prepared using contributions from individuals with relevant professional and technical experience, as explicitly set out in the WR. This includes individuals holding memberships of relevant professional bodies. Limited editorial AI assistance was used for editorial and organisational support and not as a substitute for professional judgement or evidential analysis. Contributors remain anonymous due to legitimate concerns regarding personal and professional considerations. Community participants should not be required to forgo privacy in order for their evidence to attract appropriate weight within the Examination.

Overall, the Applicant's response does not in any way justify reducing the weight attached to SEPE's Written Representation. Rather, it confirms that a number of substantive matters remain unresolved and continue to warrant careful scrutiny during the Examination.

10.1 Case law cited by SEPE

The Applicant's critique of SEPE's reliance on case law appears overstated. For example, for *Blewett*, the Applicant identifies alternative readings of the authorities cited by SEPE, but then appears to incorrectly treat those interpretations as negating SEPE's position altogether. That is a *non sequitur*. In *Blewett*, the Court recognised both that an Environmental Statement need not be "perfect" and that it must nevertheless contain sufficient information to enable an informed and reasoned conclusion on likely significant effects. Those propositions are not mutually exclusive. SEPE's reliance on *Blewett* for the principle of intelligible and sufficiently robust environmental assessment therefore remains entirely legitimate, even if the Applicant seeks to emphasise a different aspect of the judgment. The existence of nuance or competing emphasis within a case does not necessarily undermine the credibility of SEPE's submissions or the relevance of the authorities cited.

Similarly, the Applicant's treatment of *Holborn Studios* appears to draw an unduly narrow distinction between the withholding of material and the adequacy of consultation. While the case was not an EIA authority as such, the Court expressly linked the failure to disclose underlying material with the inability of the public to engage meaningfully in the decision-making process. As the judge observed at paragraph 71:

> "The failure to provide the background material underpinning the viability assessment … was a clear and material error in the decision-taking process. In reality, in my judgment, the material with which the public was provided failed [the] test of being adequate to enable the member of the public to make a sensible response to the consultation on the application".

SEPE's reliance on the case for the broader procedural principle that decision-making requires sufficiently intelligible and accessible supporting information was therefore legitimate, even if the Applicant seeks to emphasise the narrower factual context concerning exempt material.

By way of additional submission, SEPE also notes the relevance of *Lullington Solar Park Ltd v Secretary of State for Levelling Up, Housing and Communities and South Derbyshire District Council* [2024] EWHC 295 (16 February 2024), a recent Planning Court authority concerning the proposed development of a solar farm on 49% BMV agricultural land. *Lullington* further supports SEPE's position that policy-compliant site selection for solar development on BMV land requires a transparent and sufficiently robust assessment of reasonable alternatives. In that case, the Court upheld criticism of a site-selection exercise that relied on incomplete evidence regarding the availability of lower-quality agricultural land within the relevant grid-connection area, and accepted that uncertainty over the grading and comparative suitability of alternative sites could legitimately undermine confidence in the justification for developing BMV land. That reasoning aligns closely with SEPE's case that a grid-constrained and landowner-led search process does not, without more detailed and objective comparative analysis, demonstrate that the proposed BMV-intensive scheme is necessary or represents the least harmful available option.

At paragraph 40, Judge Jarman concludes that the Inspector was correct and within his rights to take:

> "…the view that the claimant's assessment was not sufficiently robust because it failed to carry out any investigation of soil quality outside the appeal site."

Appendix A

Provisional GHG emissions for a sample selection of Scheme components/activities: BESS cells, PV panels and PV framework[13,14]

Embodied Carbon - Component/Material	Activity Data	Units	Emission factor, kg CO2e per unit	Emissions factor data source	Emissions (tCO2e)	Assumptions
Battery storage (BESS) Cells	400,000	kWh (Storage capacity)	89	Forbes (2020). Estimating the carbon footprint of utilityscale battery storage. https://www.forbes.com/sites/rrapier/2020/02/16/estimating-the-carbon-footprint-of-utility-scale-battery-storage/	142,400	
PV Panels	560,000	kWp	750	https://globalelectronicscouncil.org/wp-cont	420,000	Average carbon production, taking onto account Chinese energy manufacture. Global weighted average 2024 but adopting efficiency gains. Overplanting rate of 40% to achieve 400MWAC supply
PV Framework (steel)	22,400	Tonnes of galvanised steel	2710	Inventory of Carbon and Energy (ICE) Version 4	60,704	Approx 40 tonnes steel per MWp-dc PV capacity, various data sources. Assumes 100% galvanised steel.
Total					**623104**	

[13] Tables exported from Excel file; file available on request

[14] An additional range of smaller ancillary emissions related to decommissioning items set out in these tables, including entries such as site worker journeys and associated fuel costs, amounts to 4,217 and is not represented here for brevity

Transport - Component or material and mode of transport	Mass in tonnes	Distance in km. (sea and train, one way)	Emissions factor, kg CO2e per tonne.km	Emissions factor data source	Emissions (tCO2e)	Assumptions
Battery storage (BESS) Cells; HGV (within China)	3474.00	1000	0.05789	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Factors, 2024	201	
Battery storage (BESS) Cells; sea	3474.00	19365	0.013	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Factors, 2024	875	Approximately 8.686 tonnes per MWh based on spec sheet provided by BYD, including the container for shipping Shanghai to Felixtowe 10,456 nautical miles. -19,365km
Battery storage (BESS) Cells; HGV UK	3474.00	320	0.09294	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024.	103	Felixstowe to Little Straughton, return unladen
PV Panels; HGV (within China)	26439.00	500	0.05789	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024	765	Approximately 500 km from Xinjiang province to Freight depot. Fully laden one way. 695,760 bifacial panels each weighing 38kg
PV Panels; train (within China)	26439.00	4000	0.02779	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024. To Shanghai	2,939	Approximately 4,000 km from Xinjiang province to Shanghai by train
PV Panels; sea	26439.00	19365	0.014	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion. Factors, 2024. Shanghai to UK container port	7,168	
PV Panels; HGV UK	26439.00	320	0.09294	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024. Port to site	786	Port to site. Return unladen
PV framework; HGV central Poland to Rotte	22400	1000	0.05789	Department for Business, Energy & Industria Factors, 2024	1,297	
PV framework (steel); sea	22400	224	0.014	Department for Business, Energy & Industria Factors, 2024	70	Rotterdam to Felixstowe 121 nautical miles -224km
PV framework (steel); HGV UK	22400	320	0.09294	Department for Business, Energy & Industria Factors, 2024	666	Port to site. Return unladen
Total					**14,871**	

Component Replacement

Item	replacement rate %	Original embodied emissions (tCO2e)	Original transport emissions (tCO2e)	Replacement embodied and transport emissions (tCO2e)
Transformers		0	0	0
PV Panels	100	420,000	11,658	431,658
Panel Supports		60,704	2,033	
PV Inverter		0	0	0
BESS Inverter		0	0	0
BESS cells	300	142,400	1,179	430,737
Transformer mineral oil		0	0	0
Fence posts		0	0	0
Total				**862,395**

Decommissioning - Waste	Activity Data	Waste type	Emission factor, kg CO2e per unit	Emissions factor data source	Emissions (tCO2e)	Assumptions
Steel, recycled	22400	Tonnes	0.98485	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024	22	Just panel supports so far
Batteries (cells only), recycled. Do not enter weight but number of kWh	1,600,000	Electrical items – batteries	11	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024	17,600	This factor is not weight related but based on the EU Product Environmental Footprint Category Rules the the Rapier report on Forbes.com
PV Modules	52878	Tonnes	6.41061	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024	339	Figure as in production emissions + 100% to account for module replacements over lifetime in line with replacement rate expectations. Assumes all panels will be recycled.
Total					**17,961**	

Decommissioning - Waste Transport						
Category	Mass in tonnes	Distance (km)	Emissions factor	Emissions factor data source	Emissions	Assumptions
Steel	22400	200	0.09294	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024	416	Artic HGV tipper. Assume 100km distance - likely much less than this.Arrival trip unladen
Batteries	13896	200	0.09294	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2024	258	Enclosed Artic Hazchem assume 100km. Arrival trip unladen
PV Modules	52878	200	0.09294	Department for Business, Energy & Industrial Strategy, Greenhouse Gas Reporting: Conversion Factors, 2025	983	Figure as in production emissions + replacements
Total					**1,658**	

Total of all categories (TCO2e)	**1,524,206**

Appendix B

Evidence submitted during the Great North Road Examination:[15]

Project Name	PINs Reference	Export MW AC	Panel type	Source Document	Capacity Factor (CF) or PVsyst	Adopted or resultant capacity factor (%)	Annual generation MWh AC
Mallard Pass (Rutland)	EN010127	350	Not selected	Page 10 APP-025	CF	10	350,000
East Yorkshire (Howden)	EN010143	480	Single axis (H) trackers	Page 6-41 APP-058	PVsyst	10	433,709
Dean Moor Solar Farm (Cumbria)	EN101155	150	Bi Facial fixed	Page 2 of APP-161	CF	10.2	134,028
Average Capacity Factor UK		2018-2023			CF	10.36 (see below)	
Helios Renewable Energy Project (North Yorks)	EN010140	190	Single axis (H) trackers	Page 1 of APP-162	CF	10.6	176,550
Heckington Fen Solar Park (North Kesteven)	EN010123	400	Bi Facial Fixed	Page 1 of APP-023	CF	11	385,704
Botley West (Oxfordshire)	EN010147	840	Fixed (Total DC capacity around 1,200 – 1,375 MWp)	Pages 17-18 of APP-215	CF	11.06	813,594

Project Name	Reference	Export MW AC	Panel type	Source Document	Capacity Factor (CF) or PVsyst	Adopted or resultant capacity factor (%)	Annual generation MWh AC
Sunnica (Cambs)	EN010106	630	Fixed with some Bi facial	Page 6-28 APP-38	PVsyst	12	643,361
Temple Oaks (Folkingham Lincs)	In scoping	240	Fixed	Page 1 Scoping report	PVsyst	14	294,000
Little Crow (Scunthorpe)	EN010101	100	Fixed	Appendix 4 of Deadline 4 Technical Guide	PVsyst	15	134,529
Great North Road (Newark)	EN010162	800	Bi Facial fixed		PVsyst	15.9	1,112,147
Byers Gill Solar (Darlington)	EN010139	180	Fixed	Page 19 and 20 of REP2-007	CF	16.7	263,872
Tillbridge (West Lindsay)	EN010142	500	Single axis (V) trackers	Pages 9 and 12 REP1-046	PVsyst	20	881,300

Table 1.

Table note: Since the Group's submission of Section 4 in REP1-102 , load factor data for 2024 has now been published at Dukes 3 by DESNZ. The Average UK factor above is the average for 2020-2024. Resultant Capacity Factors for PVsyst projects are calculated using the following formula:

$$\text{Capacity Factor} = \frac{\text{Annual MWh generation (according to the developer)}}{\text{MW Export AC} \times 365.25 \times 24}$$

[15] Great North Road Solar and Biodiversity Park EN010162: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010162-000887-Full%20version%20NSG7%20v4.pdf