

1. Procedural Unfairness and accessibility for Local Stakeholders

The sheer volume, technical complexity, and frequent late uploading of application documents for the East Park Energy Scheme have created a severe information asymmetry. The Nationally Significant Infrastructure Project (NSIP) process, as currently executed, heavily disadvantages the local communities across Bedfordshire and Cambridgeshire—the very stakeholders who stand to lose the most from this development.

The compressed and truncated deadlines toward the latter stages of this examination period have severely compromised the ability of interested parties to digest new material and respond comprehensively. Furthermore, the lack of clear, prescriptive guidance within the Inspector's "have your say" subject headings has introduced unnecessary confusion regarding procedural timelines. I urge the Examining Authority (ExA) to ensure that procedural fairness is maintained and that local voices are not structurally excluded due to compressed statutory windows.

2. Inadequacy of Consultation Material and Visual Documentation

The inclusion of heavily sanitised "virtual imagery" uploaded in numerous submissions fails to provide an accurate, objective representation of the project's real-world, cumulative impact on the ground across the 1,900-acre site.

Of even greater concern is a critical technical failure: these visual documents consistently fail to load across standard electronic devices, including PCs, laptops, tablets, and mobile phones. As a result, stakeholders cannot properly scrutinise the physical reality of the proposed infrastructure. Nor, I suggest can the ExA make a fully informed, legally robust determination regarding landscape and visual impacts based on inaccessible and non-functional evidence.

3. Abuse of the Rochdale Envelope and Lack of Crucial Detail

The applicant's responses to interested parties systematically defer critical technical arrangements to post-consent stages via the Development Consent Order (DCO) requirements. While the "Rochdale Envelope" principle allows for minor flexibilities, the applicant is abusing this mechanism to seek planning approval for a scheme that is unacceptably scant in detail.

By pushing essential mitigation, layout, and operational details "down the line," the applicant is asking for a blank cheque. This creates unacceptable long-term risks for rural parishes like Great Staughton, Little Staughton, Pertenhall, Keysoe and Hail Weston. I request that the ExA insist on tightly drafted, definitive requirements on the face of the DCO, ensuring the Local Planning Authorities—such as Bedford Borough Council and Cambridgeshire

County Council—remain the strict, named discharging bodies for all deferred approvals.

4. Unjustified Loss of Best and Most Versatile (BMV) Agricultural Land

The application proposes to permanently (40 years plus cannot be designated as temporary) industrialise open farmland, of which **approximately 75% is classified as Best and Most Versatile (BMV)** (specifically Grade 2 and Grade 3a soil). National planning policy dictates that BMV land must be protected from industrial development unless an exceptional, overriding national need is conclusively proven and no alternative lower-grade sites exist.

The applicant's case relies on the premise of global and national utility, yet solar generation particularly here in the UK is inherently intermittent and inefficient without massive Battery Energy Storage Systems (BESS)—proving this is a highly speculative commercial investment rather than an optimised national utility project. The applicant has failed to provide a rigorous, transparent **Alternative Sites Assessment** that justifies why lower-grade or brownfield land cannot be utilised instead of prime food-producing soil.

5. Lack of Long-Term Accountability and Enforcement Mechanisms

The architectural and corporate drivers of this scheme bear no long-term responsibility for its lifecycle. It is highly probable that the current corporate vehicle will divest and sell the asset immediately post-consent.

As drafted, the application offers no robust guarantees that the project will be built out or maintained to the standards suggested in promotional materials and “wishy washy” words. To prevent asset-flipping from leaving the community with an abandoned or poorly managed industrial site, the DCO must incorporate legally binding, ring-fenced **Decommissioning Plans** and financial bonds. These must be enforceable against any future asset owner by local planning enforcement officers.