

Some very significant concerns about the East Park Energy proposals are still unresolved. As well as areas that remain undefined, they have also made substantial changes to the scheme from the one initially submitted, all at a very late stage of the examination.

1. Unresolved Traffic Management

The Applicant has failed to clarify several points.

- Their proposed single-point site entrance for both HGV and staff vehicles remains non-mandatory and without any detail of enforcement regimes or even management plans. Despite their statements that narrow country lanes will not be used, there are still multiple site access points shown on these roads.
- There are significant errors in the estimated number of HGV movements which have not been satisfactorily addressed by the Applicant.
- There are doubts about the effectiveness of the proposed carsharing /minibus use as a voluntary method of reducing workforce traffic. The site plans still show car parking areas at every site with no detailed traffic management plans.

2. Site Selection

The last two summers of heatwaves and drought reinforces the need to follow Government guidelines for protecting Best and Most Versatile farmland and minimising its use for development. The Applicant's proposal takes 1,900 acres of farmland of which 74% is BMV land. They have failed to show that they carried out any significant work to find alternative non-BMV land for this proposal. This clearly contravenes Government guidelines

3. Material changes to the application have been made by EPE with insufficient time for examination and response

• Panel replacement Schedule

There has been late notification of radical changes to the panel replacement schedule to one which implements a timetable of 20% replacement per annum. The replacement of 20% of solar panels would involve around 140,000 panels which would create a huge increase in the level of ongoing activity and HGV movements which the Applicant has grossly underestimated. The current proposal shows the removal of the internal site access tracks at the end of construction, forcing all replacement traffic onto narrow rural roads. The Applicant has consistently claimed that HGV traffic and associated disruption resulting from the replacement work would be "negligible". However this huge increase in activity has not been quantified but the Applicant continues to insist that no HGV traffic will pass through Pertenhall or Great Staughton.

The Applicant acknowledges that "a planned replacement campaign involving 20% of the solar panels would constitute a major operational activity in its own right" and that the "associated works would be capable of generating environmental effects across a range of receptors."

It is unacceptable to reveal such a massive increase in the ongoing impact on the local environment at such a late stage in the Examination, when detailed assessment and response is not possible,

• BESS Issues

The role of the BESS is in doubt and appears to be substantially different to that proposed at the beginning of the Examination. This is a significant change and undermines the original claims by the Applicant regarding their grid connection. It has arisen with very little time for interested parties to review and respond.

With particular regard to the panel replacement schedule and role of the BESS, this is a radically different scheme and not the one that was presented to residents, local authorities, national agencies and other "interested parties". It means that interested parties have only been advised of vital information as to the Applicant's true intentions at a time when a reasoned response is not possible.

I would respectfully request that the Inspectorate refuse permission for the EPE scheme on the grounds of late-stage changes to the application which materially alter the very nature of the proposal, procedural and evidential irregularities and inappropriate location and scale.