

Submission - Deadline 8 – OBJECTION

Interested Party Reference number: [REDACTED]

East Park Energy – Planning Ref EN10141

From Interested Party - Shaun Woodward – [REDACTED] Resident.

Date 11/09/2026

Dear Mr Sword

Firstly, I wanted to thank you and your staff for your patience and continued engagement with those residents like me who vehemently oppose the proposed EPE scheme but may not always have communicated using the correct planning jargon.

This final submission from all interested parties at Deadline 8, is the end of public scrutiny for the EPE scheme despite IP's being unable to comment on the final submissions of the developer from Deadline 7 and responses deferred by the applicant to IP questions from earlier deadlines. As of today, outstanding responses have not been posted to the examination library so IP's cannot access them. This feels unfair and in favour of the applicant who has delayed responses to key questions raised by IP's which will now no longer be able to be scrutinised. It's my hope you would reconsider allowing a deadline 9 so IP's and LA's have opportunity to scrutinise the applicant's final responses to outstanding questions once made available, before the final DCO is confirmed.

As you know, if the application goes ahead as presented, by default it will damage our landscape and surroundings and commit local people to years of upheaval, construction traffic and noise. It's unavoidable however the applicant tries to minimise such change.

I trust when you conclude the examination and make your recommendations, that you will think about local people, and apply the fullest weight to the 'human' aspects of this application, and recognise that many local people, including those who felt it too difficult, or had no time to fully engage with the complexities of the National planning process still feel very aggrieved by what the applicant is doing. Those who were able have committed an enormous amount of time to engage but as the examination has developed and become more technical, it has become harder for laypeople requiring almost fulltime venture to keep up.

It has worried many people, myself included. We are looking to sell our home and downsize, partly accelerated by recent retirement (I am 65) which has become more pressing, as I need to relocate to help look after my elderly mother in her home 200 miles away following the loss of my father earlier in the year.

The spectre of the Solar scheme so close to our home is making that relocation difficult and the uncertainty is not conducive to selling property.

Public frustration with all large scale solar is driven by a huge sense of unfairness in communities, particularly when local planning applications for even minor developments in this area have been protected for so long by local councils and planning officers due to our 'special landscape'. The developers think it's acceptable to replace fields of wheat with thousands of panels only 100m from the property of my neighbours and I, but when for example I wished to site a simple 3m x 3M garden shed at my home a few years ago I was compelled to submit a 'full' planning application. That including a colour swatch for the paint "to protect the local ambience and serenity of the locality". The contradiction is obvious.

I do not wish to revisit every point I have raised against the application again in detail, but I do wish to add to, and summarise a few of them again below for your easy reference. In the absence of the last set of responses from EPE, I hope you are able to see sufficient weight in the objection arguments and the deficiencies of the application highlighted by me and others to find against it, or at least seek amendments to keep it well away from properties.

I wish to restate that certain elements have been included in the DCO by EPE to enhance 'green' credentials. If they are sincere please cast them in stone in the DCO or ignore them. It's clear that many aspects If not fixed and mandatory in the DCO now, can be amended later. This means the public scrutiny now of such claims by the applicant is pointless if nothing is tied down and simply changed later when beyond public scrutiny. I refer to questionable elements such as sheep grazing for grass maintenance, use of push press piling machines instead of hammer piling machines as simple examples. If the applicant is sincere and these claims add weight to their argument, then please stipulate they are mandatory in the DCO.

Submitted in good faith

Yours sincerely

Shaun Woodward

I do not believe the following points have been adequately addressed by the applicant to date, and I summarise for your consideration. The points are as follows:-

1/. Percentage of BMV arable land in this application – This point has been made many times, and it remains that within the scheme 74% of the land is graded as BMV, the best arable land for growing crops. This is verified in the real world by the fact that all these fields are still growing wheat and barley as they have been for decades, if not centuries. Any attempt to degrade this land and diminish it's ability to grow food is demonstrably nonsense, and food security should carry some weight in the argument. I can provide videos of very large combine harvesters at work in fields within the scheme which are all very visible from routes into our villages and from our

homes. Please give suitable weight to this loss of productive land, and the high level of BMV.

2/. Understated Water consumption – Vastly understated when looking at 40 year cycle for planting, drinking water for sheep in each ‘fenced enclosure’, staff amenities, cleaning vehicles, but mostly cleaning panels regularly, and Fire fighting - (Cooling BESS if an ongoing incident occurs) in addition to collected rainwater in tanks.

Panels with harvest dust lose efficiency up to 11% in some cases. Basic research will establish the current claimed EPE plan for 2 year cleaning cycle is impractical. Each wash cycle will require well over 1,100,000 litres of water using only a meagre 500 ml per square metre of glass (which is barely enough to wet it). The applicant claims only 1.3 Million litres in total for annual use on site, originally claiming no panel cleaning would be required at all which is ill informed and against real world evidence.

The amends to the DCO show that panel washing is usually done at night when the panels are coolest. This introduces **overnight working** across the sites creating noise and light pollution for residents from the vehicles/tractors carrying the rotary brush equipment specified and the water bowser trucks to supply them. Multiple vehicles will be operating together for effective cleaning on a site of this scale.

3/. Unlikely future use of Sheep grazing to maintain grass to boost ‘green credentials – The applicant has already refuted my previous claims regarding using sheep for grass management, maintaining it is a practical option. I continue to question the viability of this claim.

It would require arable landowners to become (or to employ) major sheep farmers, with a carefully managed maintenance plan to shepherd, transport and frequently rotate sheep to different compounds in great numbers. The *National Sheep Association* states productive UK lowland grassland requires 4 to 6 Ewes per acre on a rotational plan, = 7,600 – 11,400 Ewes for a site this size. There are no staff, lambing facilities, shelter for lambing, transport between sites allocated to this, or provision for drinking water required in each ‘paddock’, in the DCO. The rotation of sheep is a complex and technical undertaking as can be referenced in great detail via the website of the *Farm Advisory Service*, and suggests sheep need moving every three days following grazing, then grass rested for three weeks which introduces a lot of vehicle movement. I submit one small chart from that site for consideration and understanding of how intensive such an undertaking would be, particularly with the solar arrays as obstacles in the fields and uncertain flora growth and mix of species due to solar shade.

Area and group size

Maximum group size is based on practical handling capability rather than feed supply, e.g. consider the feasibility of drenching over 500 lambs in one go. The stocking rate figures below are conservative based on average summer grass growth (40 kg dry matter per hectare). This leaves room for flexibility during peak growth. This is a framework, adaption will be necessary to suit grass growth on your farm. Use the guideline targets for grass height entry and exit to support movement decisions.

Stock	Maximum group size	Guide stocking rate numbers/ha* (number/acre)	Area for maximum group ha (acres)	Paddock size for maximum group** ha (acres)	Target grass height -Entry cm	Target grass height -Exit cm
Ewes and singles	350	17 (7)	21 (51)	2.5 (6)	8	4
Ewes and twins	250	12 (4.8)	21 (52)	2.5 (6.5)	8	5
Growing lambs	500	33 (13.5)	15 (37)	2 (4.5)	8	5

* Across the whole rotation **based on the three week, three day system, i.e. area divided by eight.

Reacting to the conditions

As the table above is based on typical summer grass growth, it is likely that grass will get ahead of the animals in the spring when grass growth is at its peak. This will be evident when grass is above the target entry height when moving. This is where taking a paddock or two out for conservation is possible which reduces the rotation length.

If grass is getting ahead:

- Take paddocks out for conservation
- Use a follow-up group with lower feed demand (e.g. dry cows, ewes with singles)
- Mowing or topping
- Deferred grazing (autumn) – shut up a field to be grazed later in year

If grass growth is slowing: - Bring in additional paddocks

- extend the rotation with land designated for silage or hill ground
- Apply Nitrogen when soil temperatures are above 50C
- Feed concentrates and/or conserved forage
- Reduce stocking – sell culls, store animals, find grazing off farm

None of the much smaller and presumably manageable 50 acre small solar developments locally use sheep, probably because it's too much work and growth below arrays is pitiful. It's more realistic that operators will use tractor(s) with grass cutters driving between arrays (which is a 450km journey for this number of panels). As such I am convinced any positive planning weight attributed to using sheep on the site should be taken with a pinch of salt, and GHG calculations amended to correctly to include lengthy use of mowers, trimmers and tractors, their transportation to/across site, manpower, and diesel usage.

Strimming or mowing underneath panel arrays, with only 800mm clearance at the front edge and a maximum of 3m at the rear, (in addition to the straight tractor cut runs between arrays) will be a herculean and time-consuming task on 1900 acres.

4/. Potential Cable Damage – Exposed cables connecting panels under the arrays will be susceptible to damage by squirrels, rats and vermin. There is real world evidence of this. If rodent proof metal trunking is to be used for cabling this adds significant extra material. If roughly 1.3m of trunking (same as panel width) is required per panel x 695,760 panels = 957,365 metres of galvanised steel channel trunking will be needed. Is this included in the materials inventory and GHG calculations? What specification of trunking is proposed for the DC cabling attached to the rear of the 695,760 solar modules, and has resistance to damage by rodents, including rats and grey squirrels, been assessed? If not, what allowance has been made in the operational maintenance regime for animal-related cable and connector failures? If the cabling is to be armoured instead of using trunking this represents a different value for cabling for GHG calculations. Have the correct values been used for the GHG calculations and does it include manufacture and transport to site?

5/. Diesel use – Despite numerous requests at previous deadlines seeking a breakdown of the claimed diesel use for the site (so the stated figures can be tested), the applicant has not provided a breakdown. The figures should therefore be treated with suspicion with respect to claimed GHG calculations until such a breakdown is submitted. This will now be too late for scrutiny by IP's unless the inspector agrees a further Deadline 9 for a final assessment of the applicants missing information, some not forthcoming from earlier deadlines.

6/. Cumulative effects of nearby Solar Schemes – Weight should be given to the cumulative effects of six other solar schemes three of which join directly to the boundaries of the East Park layout. The Manor Farm scheme is surrounded by the East Park Scheme and despite the landowner being in common, the Manor Farm operators are in conflict with East Park such is the proximity. This situation cannot be regarded as not having cumulative effect, particularly when combined with the others, all grouped together.

7/. Unsatisfactory HGV route for vehicles wishing to turn south at the Eaton Ford A1 junction – This issue is acknowledged by the applicant and there is no easy solution to this situation which does not introduce increased potential traffic hazards. If HGV's use the regular route, it travels over the A1 bridge and requires negotiation of two sets of tight mini roundabouts near residential areas, a care home, and an infant school/Nursery. Turning north to use the hairpin exit and 'blind' dangerous access road onto the A1 is also a poor option, as is driving north to Buckden to use the busy roundabout to access the southbound carriageway.

The main access road from the A1 to the main entrance in site D is dangerous particularly with the addition of thousands of heavy HGV movements travelling in both directions.

8/. Traffic management and access from A1 through site D – Most local people do not believe once in operation the average 600 / max 800 commuting workers (who will be billeted at all points of the compass around the site), or HGV deliveries will follow timing schedules for delivery, or the defined route to site. Real world deliveries show drivers take advantage of quiet traffic periods and park up to queue for their allotted site visit so as not to be late. A timed schedule for deliveries will exacerbate that situation. Likewise, commuting workers (probably foreign) will use the shortest quickest routes from where they live to site to save time and cost. I can see no way this will be enforceable by the developer. It must be firmly specified in the DCO that all traffic movement is externally monitored by an independent agency to have any credibility. Minibuses may work for across site transfers, but will be little help where commuting workers are travelling from all directions.

9/. Commuting workers accommodation - I would request that the DCO must make clear any future attempt by contractors or developers to locate a construction worker 'village' on or near the site(s) after the DCO is granted is not permissible. I would be grateful if you would please make sure this is firmly covered in the current DCO along with forbidding any stayovers by staff on site. It has been known for site workers to sleep rough in vans, cars and portacabins or surrounding village roads to save cost on fuel and accommodation. I would request that any evidence of this should carry firm penalties for the constructor /developer within the details of the DCO.

10/. GHG Errors – The applicant has made several adjustments to the original GHG calcs based on scrutiny of their figures by Interested parties, due to omissions and errors. They have still not responded to my specific calculations sheet sent to you in previous submissions querying their vehicle movement claims relative to movement of materials and inventory to/from site. My calculations were in excel format and easy to read. If they were incorrect, I am happy to concede my own errors, but as yet there has been no specific response from EPE. It is important these calculations are accurate as any error reflects into GHG calculations and traffic movements and timing of such movements. I would appreciate the inspector pressing the applicant for a direct response to my calculations and confirming any resulting adjustments to the DCO.

There are other GHG miscalculations I flagged, which have not been addressed by the applicant to date – **The use of incorrect materials and therefore corresponding GHG figures for various inventory of construction materials.**

These are detailed in my last submission, but include the wrong material values used for Transformers, and the substantial tonnage of steel used for panel supports. (steel not galvanised steel). In point 4 above, the near 1,000,000 metres of metal cable trunking should also be added. Whilst this may be considered trivial, the use of incorrect or overly generalised figures for such vast quantities of material can add considerably to GHG omissions.

11/. Inadequate mitigation for recycling and understated GHG figures.

The mitigation for recycling after 20 and 40 years when all panels will be degraded and replaced is weak and understated for Greenhouse gas calculations.

The application includes generic recycling/disposal emissions but does not demonstrate that the assumed future recycling route is realistic for the quantity of PV modules to be discarded, nor does it adequately address any uncertainty surrounding future recycling capacity, new technology, transport distances, material recovery rates and the future economic viability of recycling. I pointed this out in my last submission. Currently there is no facility, even in China, that can handle the number of UK solar panels for recycling which will be entering the market at the 20 year mark. The EPE discarded panels alone, I calculated would take up half a year's capacity for the largest current European recycling plant in Europe. However in 20 years all the UK NSIP's projects will also be shedding panels in huge quantities at the same time? After checking current applications, It's likely to be 20 to 30 million panels just for UK NSIP's alone all discarded in a short time frame. Where is the EPE mitigation or modelling for that? It is not inconceivable that the panels will need to be returned to China for recycling where the strongest market for the recycled materials is likely to be in 20 years, and as such this should be modelled and realistic GHG figures attributed by EPE for their panel disposals. I don't believe EPE has demonstrated that its end-of-life assumptions represent a credible whole-life carbon assessment for approximately 59,000 tonnes of PV modules. This should be corrected, along with associated traffic movements which are likely to be far greater than the 100km from site figures stated.

12/. Change to the landscape and local amenity – However the developer frames it, the change to landscape, footpaths and bridle ways will be ruined by the solar installation and considerable additional new planting required for screening. The fact that screening is needed implies destruction of open views, particularly from footpath and bridleway 'corridors' and must be seen as counter to the temporary status. In an open undulating rural landscape previously protected by local planning and government, this aspect should surely carry great weight in the planning decision.

13/. Lack of financial guarantee or bond at decommissioning phase – It is not unreasonable for the developer to offer a watertight bond holding funds sufficient to reinstate the land back to arable status at the decommissioning phase. The scheme will pass through many owners and operators over its 40 year life and an independent bond will protect the local community, local councils, landowners and the Government from future removal costs should the owners find themselves in financial trouble during the life of the plant. This is a real-world situation and has happened, simple research will illustrate the dangers.

14/. Common decency – Should this application be approved, I would hope that the Inspector would think it reasonable to instruct the developers to move the arrays much further away from affected homes. There is other land owned by participating

landowners which could easily accept more capacity without affecting anyone. For example, residents like myself and neighbours on the B660 at Brook End. There is no reason to include the first triangular field in site B alongside the B660 which will be visible whatever mitigation is put in situ to many homes in Brook end and Pertenhall, and all people visiting or passing through the villages. Please encourage the applicant to make suitable changes to areas not close to anyones homes.

15/. Extension of the 40-year temporary status – The DCO should specifically state that if the application is approved, it cannot be extended at a later date, to say 60 years. This is known as moving the goal posts and should logically invalidate the whole planning process if it happens as it's a major material change. An extension would introduce a further round of panel changes, replacement of invertors and transformers, even the major 400Kv transformers, fencing, BESS units etc which adds a huge material change to the application and GHG calculations. 60 years cannot also be regarded as 'Temporary'. Please make this impossible within terms in the DCO. I argue that a 60 year scheme is not the same entity as a 40 years scheme and that any planning scrutiny is invalid if such a change is introduced later.

16/. Physical Extension – I would be grateful if you would please consider adding a clause, that if the DCO is granted, further expansion of the scheme into adjacent fields and land is forbidden. This would represent planning by 'creep' should it be attempted. Please also include that data centres cannot be built adjacent to the scheme within the DCO to protect residents from further expansion of the scheme. This is not an unreasonable request considering the scale of the EPE scheme

17/. Summary

I am still shocked that the developers were ever allowed to consider this area for such a large-scale scheme particularly on BMV land growing wheat, and so close to many homes.

To developers this is a pure commercial transaction, they want a DCO for a 1900 acre site to sell at profit to an investor who will then employ a construction firm decided by tender and probably from overseas to build it.

They have no interest in the people who live here or the industrialisation they will leave for this community in their wake. The excuses for using the land purely due to proximity to connection points is bogus. Many other proposed NSIP's schemes are much further from connection points. The location is about reducing cable run cost with little thought for people. EPE's reluctance to leave an independent bond in place to decommission the site in 40 years illustrates clearly their interest in optimising profit and reducing costs with little respect for locals or the landscape. It's interesting that The Gas pipeline operators near their proposed BESS compound seek a guaranteed bond, why not thousands of local villagers?

I believe over the last two years since the dark shadow of this application fell over our communities, local people have rallied to fight it in the best way they were able which is very difficult if you have a fulltime job, a family, or caring commitments.

Trying to understand how the planning process works, engage with it, find and react to updates as they happen, and put forward arguments against the development in language which carries any weight in the planning process is incredibly difficult for most people.

Interested parties and local people are always at a disadvantage when developers employ teams of Consultants, Lawyers and Planning experts. I have lost count of the number of documents submitted for your scrutiny, but the original application contained about 120 documents, some of which were 700 pages long and often highly technical. This is an impossible body of documentation to be able to scrutinise thoroughly and in detail for the layman particularly when each deadline alterations are made often spanning multiple reports.

I hope you will give appropriate weighting to the arguments local people have offered to oppose the scheme, even if not always presented in strict planning parlance.

For effective scrutiny by interested parties and local authorities (and indeed yourself), the information submitted by the applicant should be in a format which can be tested. All submissions should be validated for their accuracy and tested to find weaknesses detrimental to the rights of local people, and any unintentional errors on the part of the applicant. It is generally impossible for local people to generate the funds required for all the independent scrutiny that would be required to fully test all the applicant's submission, so we rely on the inspectorate to test all the claims, particularly in sections which are very difficult to understand.

No information supplied by the applicant or its agents can be simply taken on trust as the errors found by IP's prove. I personally have engaged with those reports where I felt I was able, to test what was being presented, and in most cases found errors, omissions, or mistakes all which lead to the applicant's case being not entirely accurate, and some points unanswered.

AI was used in locating some of the information in this submission.