

The East Park Energy application following the examination by the Planning Inspectorate should be roundly rejected as it has been demonstrated to generate substantial harm which the applicant has failed to mitigate satisfactorily. These reasons for rejection and the harm are as follows:

- Failure to demonstrate that a sequential test that was both objective and robust has been carried out prior to choosing the site location at the outset of the project. Instead relying on a scatter gun approach to local farmers and landowners and retrospectively fitting this choice of site to give a best fit for those that replied positively.
- Approximately 75% of the agricultural land proposed to be taken by the EPE project is Best and Most Versatile food producing land to be taken at a time when UK Food Security is vital. Food has been highlighted as a Critical National Infrastructure that the government has identified that it considers essential to the country's functioning. On this basis alone, the site chosen by the applicant is the wrong choice.
- This site covered by the project is a rich nature environment, the biodiversity of which would see substantial harm due to the applicant's proposals. Recent evidence from a study carried out by the Welsh Government following a PV ground mounted solar development in Llanwern on the Gwent Levels has demonstrated that there was significant nature loss following the construction phase where the habitats of multiple species were disrupted including flora and fauna with insects, bats, ground nesting and visiting birds all failing to re-establish their populations to the predevelopment levels some 3 years post completion of construction.
- The proposals would result in an industrialised corridor causing substantial damage to both tranquility and views across an attractive area of undulating Wolds countryside. Countryside, which is a historic rural landscape with small villages inset with several scheduled monuments and grade 1 listed churches together with conservation areas and numerous other listed historic buildings.
- The local road network is made up of B roads and narrow country lanes and is totally unsuited to HGV's and the level of heavy traffic over the 2-to-3-year construction programme which the applicant is proposing for this project. The applicant has failed to mitigate significant safety risks and disruption to local road users and residents that would result from construction traffic using this local road network.
- The damage to the mental health of residents in the vicinity of the proposal would be substantial with the massive noise, dust and light pollution generated during construction. Longer term the damage to the network of PROW's running through or near the project sites with the prospect of walking or riding through narrow industrialised corridors between panels with heavily impaired views would cause residents and visitors alike to lose substantial amenity value.
- Several other negatives including the unmitigated fire and contamination risks presented by the BESS element, risks which are exacerbated by high pressure gas and oil pipelines in the vicinity of the site, the impact of glint and glare from sloping areas of panels impacting sensitive receptors and increased flood risk created by the arrays and panels resulting in faster run-off during times of very heavy rain.
- The applicant's proposal does not demonstrate sufficient financial security to allow the Inspector, the Secretary of State and the local communities to be satisfied that the site would be safely and effectively decommissioned at the end of the 40-year period.

The Planning balance assessment REP7-017 which I put forward during the deadline 7 submissions was a reasoned response to the evidence presented and reviewed during the Planning Inspectorate examination. This assessment demonstrated that the level of harm substantially outweighs any public benefit that the proposed EPE Project might deliver. A public benefit which itself has not been demonstrated as there is doubt over whether the project would save more CO2e than would be generated during the construction, operation, refurbishment and decommissioning. This remains the wrong project in the wrong place and the application should be refused.