

Submission ID: SF95C061B

Please find attached my Deadline 8 Final Representation. This submission draws together matters raised in my previous representations and comments on evidence and submissions received during the Examination, including construction traffic and residential amenity, BESS safety, Best and Most Versatile agricultural land, and decommissioning and restoration. Interested Party Reference: [REDACTED]

EAST PARK ENERGY - EN010141

DEADLINE 8 - FINAL REPRESENTATION

Interested Party: Jean Tunstill

Interested Party Reference: [REDACTED]

11 September 2026

Dear Examining Authority,

I have participated throughout the Examination of East Park Energy and have made a number of submissions concerning the effect of this proposed development upon my home, the surrounding villages and the wider rural community.

As the Examination approaches its conclusion, I wish to make this final representation because, having followed the evidence and responses as closely as I reasonably can as a private individual, I remain concerned that a number of important matters have not been satisfactorily resolved.

My concerns are not new. They include construction traffic and residential disturbance, the use of productive agricultural land, BESS safety and the eventual decommissioning and restoration of the site. I have raised these matters during the Examination. My purpose at Deadline 8 is therefore not to introduce a new case, but to explain why the evidence submitted during the Examination has not provided me with sufficient reassurance.

1. Construction traffic, local roads and enforceability

My concerns about construction traffic are based upon direct experience rather than speculation.

During construction of the existing Manor Farm Solar development near my home in 2015, I made a contemporaneous written complaint recording excessive construction traffic, reversing alarms audible inside my home, deliveries exceeding the numbers communicated to residents, traffic-management problems and difficulties obtaining effective intervention from site management.

I also recorded an incident involving a large construction vehicle reversing across the road near my home. My experience taught me that there can be a considerable difference between predicted or promised construction arrangements and what residents actually experience once construction is underway.

This is why I remain particularly concerned about reliance upon predicted traffic levels, voluntary routing, self-regulation and retrospective monitoring.

I note that Great Staughton Parish Council was still raising concerns at Deadline 6 about large volumes of construction traffic using a narrow stretch of Great Staughton Road, worker traffic taking shortcuts through villages and the absence of sufficiently robust real-time enforcement. The Parish Council called for binding and independently monitored routing controls.

I also note SEPE's Deadline 7 submission concerning the Applicant's repeated reliance upon an anticipated peak of 30 HGV arrivals and 30 departures per day. SEPE states that it has been unable to identify a corresponding enforceable limit within either the draft DCO or Outline Construction Traffic Management Plan.

SEPE also raises questions about the reconciliation between quantities of construction materials and the forecast number of vehicle movements. I recognise that these are SEPE's submissions rather than findings of the Examining Authority. Nevertheless, in light of my own previous experience, I believe the underlying question is important.

If particular traffic levels and routes have formed part of the assessment of environmental and community impacts, I respectfully ask why those limits and routes should not be secured through clear, enforceable and independently monitored controls.

My experience in 2015 is precisely why operational expectations and voluntary compliance do not provide me with sufficient reassurance.

2. Construction duration and residential amenity

I also ask the Examining Authority not to underestimate what an extended construction programme can mean for the people who actually live alongside it.

Again, I speak from experience.

During construction of Manor Farm Solar in 2015, the piling noise became sufficiently intrusive that on occasions I drove to Grafham Water and sat in the car park simply to obtain some respite from it. I recall my house shaking during piling operations. I raised construction noise and disturbance contemporaneously at the time.

That construction period was approximately twelve months. I therefore find the prospect of affected rural communities experiencing the construction impacts associated with a much larger development over a period of approximately three years extremely concerning.

This is not an objection to renewable energy in principle. It is a question of whether the scale, location and construction impacts of this particular development are acceptable and whether residents have been afforded adequate and enforceable protection.

3. Battery Energy Storage System safety

I raised BESS and fire-safety concerns in my earlier submissions. Having considered the material subsequently submitted during the Examination, I remain concerned.

I acknowledge that the Applicant has amended its proposed battery safety arrangements and that equipment-specific testing and specialist review are proposed.

However, I note the concern raised in SEPE's Deadline 7 submission that the final BESS technology, chemistry, supplier and system design have not yet been selected. Consequently, important system-specific safety evidence would only become available after the Examination.

I am particularly concerned by the issue raised concerning fire modelling based upon a fire being contained to a single BESS enclosure, when evidence demonstrating non-propagation for the equipment ultimately selected would necessarily become available later.

I understand that Requirement 10 provides for the Battery Safety Management Plan to be submitted to and approved by the local planning authority prior to commencement of Work No. 2, in consultation with Cambridgeshire Fire and Rescue Service. The approved BSMP must then be implemented and maintained throughout construction, maintenance, operation and decommissioning.

However, Requirement 10 does not appear expressly to require independent specialist verification of the complete final BESS design, nor does it expressly require such independent verification before the BESS is energised. This is particularly important given the concerns raised during the Examination about the degree of flexibility remaining over the final BESS technology and design.

I do not pretend to possess specialist expertise in battery technology. That is precisely why I believe genuinely independent specialist scrutiny is important.

I respectfully ask the Examining Authority to satisfy itself that any DCO contains sufficiently robust and enforceable provisions to prevent the BESS being brought into operation unless the safety of the complete final design has first been appropriately and independently verified by suitably qualified specialists experienced in utility-scale BESS developments of comparable scale and complexity.

4. Decommissioning, restoration and financial security

In my earlier submission I specifically raised the question of whether adequate financial provision would be secured for eventual decommissioning and restoration. I remain concerned that this has not been satisfactorily resolved.

The Scheme is presented as temporary. Its eventual decommissioning and the restoration of the land therefore form an integral part of that proposition.

Decommissioning is not an unforeseen event.

Whatever the eventual cost proves to be, somebody will have to pay for the infrastructure to be removed and the land properly restored.

I note SEPE's Deadline 7 discussion of possible decommissioning costs and recognise that the figures cited are broad estimates and do not establish the actual eventual cost of completely decommissioning and restoring East Park Energy. In my view, however, that uncertainty strengthens rather than removes the need for adequate financial security.

I also note SEPE's comparison with financial safeguards sought by National Gas in this Examination, including mechanisms intended to provide protection against future insolvency or financial default.

An expectation that funds will be available decades into the future is not the same as securing those funds.

I therefore respectfully ask the Examining Authority to consider whether an appropriate legally enforceable and ringfenced financial mechanism, such as a bond or equivalent guarantee, should be secured through the DCO to ensure that sufficient funds remain available for complete decommissioning and restoration irrespective of the Applicant's financial or corporate position when those obligations eventually arise.

5. Best and Most Versatile agricultural land and site selection

The loss of productive agricultural land has concerned me from the beginning.

I note SEPE's Deadline 7 analysis, based upon the Applicant's Land and Soils information, that 75.27% of the agricultural land within the Scheme is identified as, or assumed to comprise, Best and Most Versatile agricultural land.

I have deliberately described this as SEPE's analysis rather than presenting it as an established finding. I also understand that Best and Most Versatile agricultural land comprises Grades 1, 2 and 3a, and does not include Grade 3b.

The proportion involved nevertheless raises an important question about site selection.

Paragraph 2.10.21 of National Policy Statement EN-3 states that where the use of agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land, avoiding the use of Best and Most Versatile agricultural land where possible.

That seems particularly relevant to a development containing such a substantial amount of Grade 2 and Grade 3a agricultural land.

I therefore remain concerned about whether the site-selection and alternatives process provides sufficient justification for choosing this particular area of productive agricultural land and whether reasonable alternatives involving poorer-quality land were adequately considered.

6. Soil condition and eventual return to agriculture

The proposed temporary nature of the development is also relevant to the claim that the land can eventually be returned to agricultural use.

I note that the Applicant has stated that much of the site would not be permanently adversely affected and could be reverted to its existing agricultural condition following completion of the Scheme.

However, SEPE's Deadline 7 submission refers to technical evidence, including a 2023 ADAS report, concerning soil compaction and structural damage associated with solar development and the time that recovery from compaction may take.

I am not suggesting that this evidence establishes that East Park Energy will permanently damage the soil. It does, however, appear to me to challenge any assumption that complete restoration to the existing agricultural condition will necessarily be simple or automatic.

This makes both the protection of the soil throughout the development and the adequacy of the eventual restoration arrangements particularly important, especially given the high proportion of BMV agricultural land involved.

7. The burden upon local communities

Finally, I ask the Examining Authority to recognise the considerable burden that participation in a process of this scale places upon ordinary members of affected communities.

Residents attempting to participate meaningfully have been required to follow a very substantial and evolving body of technical documents, submissions, responses and revisions, often within relatively short Examination deadlines.

I am a private individual. I am not a planning professional, lawyer, highways engineer, agricultural specialist or battery expert. Nevertheless, I have devoted a considerable amount of time to this Examination because my home and community would experience the consequences of the development.

My husband and I were also involved in opposing the previous solar development near our home. The commitment required at that time became effectively continuous and had a serious effect upon our family life and my husband's wellbeing.

The resources available to an individual resident cannot reasonably be compared with those available to an Applicant supported by professional planning, legal and technical teams.

I therefore respectfully ask the Examining Authority to give proper weight to the evidence and lived experience provided by local residents. Our lack of professional resources should not diminish the value of our direct knowledge of the roads, villages, countryside and communities which would experience the consequences of the development.

Conclusion

I have lived in this rural area for many years and value it greatly. I recognise the national importance of renewable energy and I am not opposed to renewable energy in principle.

My objection is to the scale, location and consequences of this particular Scheme and to matters which, despite the extensive Examination process, I believe remain insufficiently resolved.

My previous experience of solar construction has taught me that assurances and predicted controls on paper do not necessarily reflect the experience of residents once construction begins. That is why I place such importance upon enforceable safeguards rather than expectations or voluntary arrangements.

For the reasons set out in this representation and in my earlier submissions, **I remain of the view that Development Consent should not be granted on the evidence presently before the Examination.**

If the Examining Authority is nevertheless minded to recommend that consent be granted, I respectfully ask that it does not rely upon assurances or future intentions where binding safeguards can reasonably be secured through the DCO. In particular, I ask for robust and independently enforceable protection concerning construction traffic and routing, appropriate independent verification of the final BESS design before energisation, and legally secured financial provision for eventual decommissioning and restoration.

I would finally ask that the Examining Authority consider not only what this development promises to deliver nationally, but also what the communities asked to accommodate it will be required to live with locally.

Yours faithfully,

Jean Tunstill

Interested Party Reference: [REDACTED]