EAST PARK ENERGY

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East Park Energy, C/O Lexington
Third Floor, Queens House,
Queen Street, Manchester,
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Richard Fuller MP
Member for Parliament for North East Bedfordshire
Biggleswade Conservative Club
St Andrew's Street
Biggleswade
Bedfordshire
SG18 8BA

Thursday 15th February 2024

Dear Richard Fuller MP,

Many thanks for getting in touch and for your continued engagement with RNA Energy. We have tried to answer as many of your questions as possible. For an independent analysis which is consistent with the information we supply, you may want to look at the House of Commons Library publication "Planning for Solar Farms" dated 8 November 2023.

Below, you will find our responses to the questions you raised:

Questions on the proposal:

The site, spanning approximately 800 hectares, includes areas for solar arrays, a battery storage facility, the grid connection corridor, and substantial landscape and ecological areas. Approximately 472 hectares will actually have solar panels on the land. The breakdown for solar arrays on sites A, B, C, and D as shown at the non-statutory consultation is as follows:

- Illustrative solar area in Site A is 86 hectares, or 212 acres
- Illustrative solar area in Site B is 256 hectares, or 633 acres
- Illustrative solar area in Site C is 68 hectares, or 168 acres
- Illustrative solar area in Site D is 62 hectares, or 153 acres

The scheme is anticipated to export up to 400MW of electricity to the National Grid, which is enough to supply 108,000 homes. This is a little more than the 350 MW Cleve Hill solar park in Kent that is currently under construction and less than the 500MW Longfield Solar Farm in Essex that was consented last year.

It is important to recognise that there has been a step change in the number of applications for large scale solar developments requiring consent under the Planning Act 2008 in recent years. To date only three have been consented. However, there are eight current applications and according to the Planning Inspectorate website there are up to 15 applications due this year, of which two have recently been submitted but not yet accepted for examination. There are particular concentrations of large scale proposals in the Trent valley, specifically in Lincolnshire and Nottinghamshire. The Mallard Pass Solar Project is the nearest large scale solar project to East Park that we are aware of. It is approximately 30 miles to the north of East Park and is expected to have a capacity of 350MW. A decision on that application is due this summer. Slightly further away to the east is Sunnica Energy Farm with a decision due this Spring.

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The size of projects is increasing to meet the Government's ambitious targets for Net Zero. Further up the A1, non-statutory consultation has recently begun on the Great North Road Solar Park at Newark which is twice the size of East Park. Statutory consultation recently closed on Botley West Solar Farm near Oxford, which is almost twice as large as East Park.

The time of year does affect electricity production, which would be around seven times greater in the summer compared with the winter. In total, the project is expected to generate around 480 GWh per year, enough to power about 108,000 homes as mentioned above.

You have asked about current and proposed solar farms within 10 miles of the boundaries of the site. Although we have not researched all developments that far away, we are aware of the following solar developments in the immediate area:

a) Little Staughton airfield (Next Energy)
b) Manor Farm, Pertenhall (Foresight)
c) North of Bassmead Manor (Next Energy)
d) Grafham Water (Anglian Water)

In addition, we are aware of the following proposals in the immediate vicinity of the project:

a) Current application to extend solar farm north of Bassmead Manor (Next Energy),
b) Screening opinion at Cobholden Solar Farm, Bushmead Road (Cambridge Power).

The indicative timetable of the application for development consent is outlined below:

- **October – November 2023: Non-Statutory Consultation**
  This phase of consultation formally introduced the community to East Park Energy and provided the community and other consultees an opportunity to give feedback on the initial proposals.
- **Summer 2024: Statutory Consultation**
  Following the non-statutory consultation, RNA Energy will consult the community on the revised proposals. This will be explained in a Statement of Community Consultation which will also explain how the feedback we received during the non-statutory consultation has influenced the scheme. In addition, we will consult statutory consultees (as outlined in sections 42, 44, 46 and 48 of the Planning Act 2008) and others on the revised proposals.
- **Q1 2025: Submission of Application for Development Consent**
  RNA will consider all the feedback received and will refine its proposals before submitting the application for development consent to the Planning Inspectorate, including a Consultation Report. If the application is accepted, it will go through a pre-Examination period of typically 3 to 4 months, prior to a six-month formal Examination period.
- **Summer/Autumn 2025: Examination**
  This is a set process with statutory timescales. The application for development consent will be scrutinised by an independent inspector (or inspectors) appointed by

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the Planning Inspectorate (known as the 'Examining Authority'). There will also be an opportunity for interested parties to make representations and participate in oral hearings as part of the Examination.

- **2026: Decision**
  The Examining Authority will make a recommendation on whether the application for development consent should be approved before the Secretary of State for Energy Security and Net Zero makes the final decision (normally within 6 months of the close of the Examination).
- **2028: Contracted date to be in service.**

As outlined above, RNA Energy will be delivering a statutory consultation on the application in the coming months. In the run up to the consultation, the masterplan will be finalised, and we will be able to provide further details on the scale and positioning of the solar arrays and battery storage elements of the scheme.

We have not yet determined the fencing, but it is likely to be like other similar developments in the area.

There are 34 houses within 100 m of the scheme boundary (red line).

There are 15 houses within 100 m of the proposed solar areas as shown on Figures 3-2a, 3-2b and 3-2c of the Scoping Report.

There is one house within 10 m of the scheme boundary (where 'Access 2' meets B645 on Figure 1-2 of the Scoping Report).

There are no houses within 10 m of the proposed solar areas as shown on Figures 3-2a, 3-2b and 3-2c of the Scoping Report.

Questions on Land Quality

On 30 October 2023 we submitted our Scoping Report to the Planning Inspectorate and on 8 December 2023 received our Scoping Opinion. The Scoping Report contains a lot of information about the environment in the study area – that is the area in which it is proposed to develop East Park. Chapter 17 of the Scoping Report deals with land quality. Land classification surveys have been carried and there is a full report in Appendix 17-1. Table 17.2 summarises the findings and sets out that 24% of the land is grade 2, 50% grade 3a, 24% grade 3b and 2% non-agricultural. In other words 74% of the land is grade 2 or 3a and hence Best and Most Versatile land (BMV).

Paragraph 2.10.29 of NPS EN-3 (Renewable Energy Infrastructure) states:

"*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to*

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higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible."

The subsequent paragraphs state:

"*Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land , or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered…"*

"*It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land*."

We have set this out in some length as it is possible to convey the wrong impression from selectively quoting only paragraph 2.10.29. The NPS, when read as a whole makes it clear that there is a preference for development of solar projects to be on brownfield, industrial and low and medium grade agricultural land, but that it is not prohibited to use BMV land and if applicants wish to do so they should explain their choice. We believe that we will be able to explain why the land we have used is mostly BMV land and hence demonstrate compliance with the relevant policy tests.

The Application will be accompanied by an Outline Soil Management Plan that will set out how the soil will be managed during construction.

Not all the land that we will lease will be used to site solar panels and we are working with Rothamsted Research to incorporate multifunctional land-use and increase biodiversity and soil quality benefits.

Mitigation measures will be in final application, with some indication of these available at the statutory consultation later this year.

We have met with those who have expressed concern about living in homes that are "enveloped" and asked them what changes they would like to see to the scheme.

Our application for development consent will be accompanied by a flood risk assessment. Work has already begun on this. Chapter 9 of the Scoping Report sets out the proposed methodologies.

Questions on Participating Landowners

We split the landowners into two categories – those hosting solar panels and those with the grid connection. There are eight in the former category and, depending on the final routing, around six more in the second category. Whilst we consider the terms of the leases to be confidential, we can say that the lease is for 30 years with an option to extend for a further 10 years.

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Questions on Power Storage

The following is a list of applicable standards to battery energy storage systems:

Code	Name
2004/108/EC	EMC Directive
2006/95/EC	Low Voltage Directive
Directive 2006/66/EC	Directive of Batteries and accumulators and waste batteries and accumulators
IEC 60076	Power Transformers
IEC 60183	Guidance for the selection of high-voltage A.C. cable systems
IEC 61000-6-2	Electromagnetic compatibility (EMC) - Part 6-2: Generic standards - Immunity for industrial environments
IEC 61000-6-4	Electromagnetic compatibility (EMC) - Part 6-4: Generic standards - Emission standard for industrial environments
IEC 61140	Protection against electric shock – Common aspects for installations and equipment
IEC 61727	Photovoltaic (PV) systems - Characteristics of the utility interface
IEC 62116	Utility-interconnected photovoltaic inverters - Test procedure of islanding prevention measures
IEC 62477	Safety requirements for power electronic converter systems and equipment
IEC 62619	Secondary cells and batteries containing alkaline or other non-acid electrolytes – Safety requirements for secondary lithium cells and batteries, for use in industrial applications
IEC 62933	Electrical energy storage (EES) systems
National Grid	National Grid - Grid Code
NFPA 855	Standard for the Installation of Stationary Energy Storage Systems
UL 9540A	Test Method for Evaluating Thermal Runaway Fire Propagation in Fire battery Energy Storage System
UN38.3	UN Manual of Tests and Criteria

The battery energy storage system will have a power capacity of 100 MW and an energy capacity of 200 MWh (the energy capacity may change during detailed design). It is expected to cover an area of approximately 1.4 hectares.

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The most common perceived risk associated with battery energy storage is fire. To prevent fires from occurring, the battery chemistry is carefully chosen, the density of batteries and spacing between components is designed appropriately, a robust battery management system is installed and heat and gas detectors are installed. In the very unlikely event that a fire occurs, the fire suppression system will activate, the system will shut down, the spacing between components will prevent spread and the fire department will be notified.

We have begun discussions with Cambridgeshire Fire and Rescue to discuss a fire safety plan.

We have proposed that the battery storage will be located to the south of New Wood south of Little Staughton, and hence be screened from the village by the wood.

Security arrangements will include CCTV cameras and security fencing.

We do not believe that there are any properties within 250m of the proposed battery storage location.

Construction / Deconstruction

Chapter 3 of the Scoping Report, and section 3.3 in particular provide a working description of the Scheme.

It is estimated that it will take approximately 24 months to construct the Scheme. Requirements will be included in the DCO to control the development (these operate in a similar way to planning conditions). There will be multiple requirements proposed in the draft DCO which will include various management plans which will need to be approved by the relevant planning authority and will help to ensure that construction impacts will be mitigated. For example, we intend to propose a Construction Traffic Management Plan.

After 40 years the project will be decommissioned. There will be a plan to govern how this is done and it will be assessed in the Environmental Statement that accompanies the application for development consent. This will be secured by a requirement in the DCO.

Financing for the scheme

The delivery of East Park Energy is fully costed and will be evidenced by a Funding Statement to be prepared and submitted with the application.

Legacy Fund

The scheme includes the establishment of the East Park Legacy Fund, which is designed to create financial opportunities for neighbouring communities. During the non-statutory consultation, we actively sought input from local residents on optimising the delivery of this fund for maximum benefits to the community. Suggestions ranged from compensating residents to the restoration of Keysoe Church.

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Furthermore, residents proposed diverse initiatives, including the provision of electric vehicle charging points, funding for solar panels on rooftops, and grants aimed at enhancing the sustainability and efficiency of homes. These ideas underscore the comprehensive approach we aim to take in contributing to the well-being and progress of the communities we engage with.

While the specific timescale for delivering the East Park Legacy Fund has yet to be finalised, our vision is to make the fund available within the first 15 years of the scheme, ensuring its positive impact is realised and sustained over an extended period. We are aware that Solar Energy UK are looking into a standard tariff for community funds and are likely to adopt their proposals if available before we make our application.

Question of the Surrounding Area

We have considered expanding the area of the site but have decided not to do so.

Questions on Documentation for MP only (under NDA if necessary)

In our commitment to safeguarding the privacy and interests of our landowners and investors, RNA Energy refrains from sharing additional materials that fall under the category of private information. This measure ensures the confidentiality and security of sensitive data.

Nevertheless, we remain open and eager to engage in a more detailed discussion, should you wish to explore and understand further.

Yours sincerely,

Nigel Viney
Managing Director
RNA Energy