1. Relevant policy framework

This representation is made with reference to:

- National Policy Statement EN-1 (Overarching Energy)
- National Policy Statement EN-3 (Renewable Energy Infrastructure)
- National Planning Policy Framework (NPPF)
- Planning Act 2008
- Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations)
- Government policy on food security and agricultural land protection

2. Cumulative impact: NSIPs in North Bedfordshire

The Environmental Statement must include a Cumulative Effects Assessment (CEA) under the EIA Regulations, considering combined impacts of the proposed development with other existing, approved, and "reasonably foreseeable" developments.[1] This requirement is reinforced by national policy (NPPF).

Bedfordshire is experiencing above-average housing growth and is also the focus of five Nationally Significant Infrastructure Projects, particularly affecting North Bedfordshire:

- A428 Black Cat to Caxton Gibbet Road Scheme (Tier 1) [2]
- East West Rail (Tier 2)
- Universal Studios Theme Park (Tier 1)
- Tempsford New Town (Tier 3)
- Luton Airport Expansion (Tier 1)

Despite the scale and relevance of these infrastructure projects, the applicant's Environmental Statement only includes the A428 Black Cat scheme and East West Rail within its cumulative assessment. The remaining three major projects are omitted entirely, which is a significant deficiency given their potential to contribute to cumulative impacts.

Furthermore, the assessment of EWR is inadequate. The applicant limits consideration to two areas: transport and traffic during construction and socio-economic effects. More critically, the applicant incorrectly classifies EWR as Tier 3, citing the absence of a scoping report, and quoting PINS advice that Tier 3 schemes can be assessed qualitatively and at "high level" to justify its assessment.[3] This is factually inaccurate. EWR's scoping report was submitted in January 2025,[4] which places it within Tier 2. The error indicates a failure to take into account readily available information, which materially undermines the adequacy of the cumulative impact assessment.

[1] EIA Regulations 2017, Schedule 4 para 5(e)

[2] The tier system ranks developments by their certainty and level of available information used for guidance on the detail of assessment needed for that development. https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment

[3] PINS Advice note 17, https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment

[4] East West Rail, Environmental Impact Assessment Scoping Report, 2 January 2025 https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/TR040012/documents

The applicant's assessment assumes that construction of East West Rail is "unlikely" to overlap with the construction phase of the Proposed Development and concludes that no "detailed cumulative assessment is required." [5] A similar conclusion is made for the A428 Black Cat to Caxton Gibbet scheme, on the basis that construction is expected to be complete before work on the proposed development begins.

Cumulative effects, however, do not depend solely on overlaps of construction phases. They also arise from permanent land use change, landscape and visual change and increased industrialisation of rural areas resulting in a loss of rural character.

The application, therefore, fails to provide a comprehensive and realistic assessment of cumulative effects.

3. Uncertainty about Tempsford New Town

A New Town at Tempsford has been recommended by the Government's New Towns Taskforce with the view that it could be a settlement of a minimum of 40,000 homes. The boundaries for this potential new town have not been released, but a 40,000 home new town would be of a scale to be in the proximity to the Proposed Development. It is thought that at 40,000 homes the proposed New Town would extend from Tempsford to St Neots including land east and west of the A1 and Great Northern Rail Line and likely adjacent to the boundary of the Proposed Development.

There have been calls for an even larger New Town at Tempsford that would double its size. It does not seem wise to proceed with this Proposed Development in isolation of planning for any proposed New Town. A decision on whether or not a New Town will be built at Tempsford should be made by the government in the first half of this year. This announcement should also provide the first determination of the boundaries of Tempsford New Town and its scale. Should a New Town at Tempsford be approved by the government, the applicant should be required to consult with, and obtain development approval from, any Tempsford New Town Development Authority.

4. Cumulative impact: over-concentration of solar development

EN-1 paragraph 4.3.3 requires cumulative impacts to be assessed and EN-3 states that applicants should consider the "cumulative impacts" of situating a solar farm in proximity to other energy generating stations and infrastructure.[6]

When combined with existing and consented schemes in North Bedfordshire such as Odell Glebe Solar Farm, Glebe Farm Solar Energy Park and Cobholden Solar Farm in Staploe, the Proposed Development would mean that over 4000 acres of countryside in North Bedfordshire would be covered by glass solar panels.

---

[5]Environmental Statement, Volume 1 Main Report, Chapter 9: Traffic and Transport, para 9.11.19, pg 9-97 https://eastparkenergy.co.uk/wp-content/uploads/dco//Volume%206-1%20-%20Main%20Report/6.1%20ES%20Vol%201%20Chapter%2009%20Traffic%20and%20Transport%20P01.pdf

[6]National Policy Statement for Renewable Energy Infrastructure (EN-3) para 2.10.18, pg 95, https://assets.publishing.service.gov.uk/media/695d1368b5c46330350ed9a2/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf

The cumulative effect is the progressive industrialisation of a rural landscape, fundamentally altering land use, character and community experience.

5. Inappropriate use of 'Best and Most Versatile' agricultural land

The Proposed Development would occupy approximately 1,900 acres of farmland, of which around 74% is classified as Best and Most Versatile (BMV) agricultural land (Grades 2 and 3a).

Although described as temporary, the proposed 40-year operational lifespan constitutes generational loss of productive farmland.

EN-3 provides that previously developed land should be prioritised and where agricultural land is deemed "necessary", lower-quality agricultural land is used with "Best and Most Versatile" agricultural land 'avoided'.[7] The NPPF similarly emphasises that BMV land is a finite national resource.

The application fails to demonstrate that:

- Lower-grade land has been prioritised
- The use of BMV land is unavoidable
- The scale of agricultural land-take is proportionate to the benefits claimed

This represents a clear conflict with national policy.

6. Landscape, visual and rural character harm (EN-1 & EN-3)

The NPPF includes an overarching objective to protect and enhance the natural and local environment, explicitly recognising the "intrinsic character and beauty of the countryside."[8] Similarly, EN-1 acknowledges that landscape effects arise not only from a landscape's ability to accommodate change without significant harm, but also from the nature and "magnitude of change" proposed. [9] Both EN-1 and EN-3 recognise that large-scale solar developments can result in significant landscape and visual harm, particularly in open rural settings.

The Proposed Development would:

- Introduce extensive industrial infrastructure into 1900 acres of open countryside, transforming the landscape from rural to industrial in character
- Create long-distance, multi-parish visual impacts
- Permanently and fundamentally alter the rural landscape and character

EN-1 requires applicants to minimise harm to landscapes through careful design. [10] However, the scale of this proposal means that meaningful mitigation is inherently limited. The development would cover an area comparable in size to Gatwick Airport with nearly 700,000 solar panels up to 3 metres high, together with fencing, lighting, CCTV, inverter stations, transformer units, and battery storage infrastructure.

---

[7] EN-3, para 2.10.21, pg 95

[8] NFFP para 187 pg 54
https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

[9] Overarching National Policy Statement for Energy (EN-1), 5.10.4, pg 164,
https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025/overarching-national-policy-statement-for-energy-en-1-2025-accessible-webpage

[10] EN-1, para 5.10.6, pg 164

Unlike other solar energy projects in North Bedfordshire that incorporate measures to integrate with their surroundings, this scheme fails to blend into the landscape or respect rural character. Instead, it constitutes an industrial-scale energy complex imposed on open countryside.

The mitigation measures proposed are insufficient in both scale and effectiveness. Planting intended to 'screen' the development is unreliable; it often fails, and even where successful, requires many years to mature, during which time the development would remain fully exposed. Crucially, the site's topography makes effective screening near impossible. Many of the fields proposed for panel arrays slope away from key viewpoints, meaning vegetation would sit lower than the development behind it. Large parts of the site lie on sloping and elevated terrain, preventing planting from concealing the extensive mass of glass, metal, and associated infrastructure. As a result, the proposed planting would not screen the development at maturity, let alone in the short or medium term.

The application also fails to consider cumulative impacts on landscape character. Many of the major projects referenced earlier remove or alter large areas of open countryside. Taken together, they contribute to an incremental loss of rural identity, reduced separation between settlements, and an increased perception of urbanisation.

7. Corporate history and financial viability

When I first met with Brockwell Energy in May 2024, it was confirmed that the acquisition of East Park Energy by Brockwell marked its first foray into solar energy. It has no operational solar farms and no prior experience in developing solar farm projects. This lack of relevant expertise raises significant concerns about their ability to deliver a complex renewable energy scheme such as the Proposed Development. Inexperienced developers may underestimate challenges related to such a project which could lead to delays, cost overruns, or even project failure. Given the scale and sensitivity of this development, Brockwell's absence of a proven track record in solar energy project delivery and operation should be considered a material risk.

Additionally, there is a real possibility that, like the original developer, RNA Energy, which sold the project to Brockwell early in the project's lifecycle, Brockwell may choose to sell the project on rather than complete it, particularly if unforeseen technical or financial challenges arise. This creates further uncertainty about who will ultimately be responsible for delivering and operating the scheme, and whether future owners will have the necessary expertise or resources to meet long-term obligations.

Ultimately, the risk of project failure will directly impact local residents, the surrounding community, and the land itself. If the project stalls or changes hands repeatedly, the area could be left with an unfinished or poorly managed development, causing long-term disruption and harm to the local environment.

8. Political risk and stranded assets

The investment profile for the Proposed Development is long lasting and is highly dependent on long term contract arrangements ultimately underwritten by the government. In the past 12 months there has been a significant change in the political consensus on renewable projects with at least one national political party indicating that their policies would remove subsidies thus making many schemes financially unviable. The next General Election must be held by June 2029 at the latest.

The risk for this development is that construction could fall during an election cycle. If this is the case and the policy changes above occur, the project could lose its long-term revenue agreements. This would create a serious risk of the development becoming a stranded asset, partially constructed or abandoned, leaving incomplete infrastructure and causing lasting harm to the landscape of North Bedfordshire, as well as disruption to the local environment and community.

The Proposed Development should be required to provide financial projections that account for any potential removal of renewable subsidies and how they intend to maintain financial viability in that scenario.

The following sections and annexes include information, evidence and analysis provided by the local campaign group, Stop East Park Energy, which I have agreed to include as part of this representation.

9. Construction impacts and rural infrastructure capacity

Construction is expected to last at least 30 months, involving tens of thousands of HGV movements on narrow rural roads, as well as significant site operative traffic.

EN-1 paragraphs 5.3-5.14 require that construction impacts be realistically assessed and effectively mitigated. Evidence from another solar NSIP demonstrates that such impacts are routinely underestimated and difficult to control in practice.

Detailed comparative evidence is provided in Annex A of this document, demonstrating the risks of relying on construction management plans and DCO controls alone.

10. Battery Energy Storage System (BESS) risks

The Proposed Development includes a substantial battery energy storage system.

Under EN-1 paragraphs 4.12 and 4.13, safety risks must be properly assessed and mitigation shown to be deliverable. Significant concerns remain regarding:

- Fire and explosion risk
- Emergency response capability in rural areas
- Transparency of emergency planning

Comparable evidence from Cleve Hill is set out in Annex A.

11. Claims of Low Energy Cost: Solar-plus-BESS model

Independent analysis by Professor Day demonstrates a solar-plus-BESS financial model often used in large-scale ground-mounted solar projects like the Proposed Development.[11] The model is based on co-locating battery storage systems with solar arrays primarily to enable energy arbitrage and grid services rather than solely to minimise curtailment. This approach can increase the levelised cost of solar energy to £130/MWh, around 75% higher than current Contracts for Difference strike prices and significantly more than offshore wind. These findings raise questions about claims that solar energy plants, like the Proposed Development, will deliver 'cheap,' 'affordable,' or 'low-cost' electricity and meet policy requirements for affordable renewable energy.

12. Failure to adequately consider alternatives

Given the adverse impact the development would have on the area, the East Park Energy application does not convincingly demonstrate that reasonable alternatives have been considered including that:

- Brownfield or previously developed land options have been systematically explored
- Rooftop and embedded solar have been meaningfully assessed
- Lower-quality agricultural land has been prioritised
- The scale of development has been reduced to minimise harm

This failure materially weakens the policy case for consent.

13. Failure to properly respond to community feedback from Statutory Consultation (October 2024)

Under Chapter 2 of the Planning Act 2008, applicants must not only consult but have regard to responses received.

Despite extensive community feedback during the October 2024 statutory consultation, the application shows no material change to:

- Site selection or scale
- Land-take from BMV farmland
- Construction duration or routing
- Cumulative impact mitigation

This represents a failure to meaningfully discharge statutory consultation duties and weighs against the grant of consent under EN-1

[11] Professor Day, "Battery energy storage trading: who pays the price?
Large-scale solar utilities with co-located battery storage: a brief exploration of the business case"
January 2026, https://stopeastparkenergycouk.wordpress.com/wp-content/uploads/2026/01/battery-energy-storage-trading-who-pays-the-price-analyis-and-policy-implications-120126.pdf

14. Overstatement of energy benefits: capacity versus actual output (EN-1)

14.1 Capacity is not energy

EN-1 requires decision-makers to assess real, deliverable benefits, not headline metrics.

A critical distinction must be drawn between
- Installed (nominal peak) capacity, and
- Actual average energy delivered to the grid

14.2 Evidence from 2024 solar output data

The graph submitted with this representation under Annex B (average monthly power versus nominal peak output for a 400MW capacity solar scheme, using 2024 data) demonstrates that:
- Nominal peak output is never achieved in practice
- Average output remains a very small fraction of peak capacity
- Output is lowest in autumn and winter, when demand is high

14.3 Independent national modelling

Independent modelling by Professor Tony Day, with whom I have met alongside other MPs in Parliament, shows that UK solar capacity factors average only 9.5–11%, with particularly poor winter performance, and that increasing grid-scale solar capacity leads to diminishing returns and rising summer curtailment.

14.4 Implications for East Park Energy

The application relies heavily on installed capacity to justify extensive land take and harm. However:
- Actual energy contribution is modest
- Seasonal mismatch limits usefulness at times of system need
- Additional capacity increasingly results in curtailment rather than usable generation

More information is provided in Annex B.

15. Weight in the planning balance (EN-1)

Under EN-1, where adverse impacts are substantial and long-term, decision-makers must be satisfied that benefits are real, proportionate and necessary.

In this case:
- Harms are concentrated, permanent and locally borne
- Benefits are limited by climate, seasonality and system constraints
- Embedded and rooftop solar alternatives can deliver similar energy benefits with far lower environmental and social cost

16. Conclusion

The Proposed Development presents unacceptable and disproportionate harm to North Bedfordshire's landscape, communities, and agricultural resources. The application fails to meet fundamental requirements of national policy and good planning practice. It does not adequately assess cumulative effects alongside other nationally significant infrastructure projects in North Bedfordshire, nor does it address the uncertainty surrounding Tempsford New Town and the real possibility that this land could be absorbed into future development. It ignores the cumulative impact of an over-concentration of existing and consented solar schemes, accelerating the industrialisation of a rural landscape.

The proposal conflicts with national policy on protecting landscape, visual amenity, and rural character, and unlike other solar schemes in the area, makes no meaningful attempt to integrate with its surroundings. Serious concerns remain about the developer's lack of experience, the financial viability of the project, and the political risk that could leave the site as a stranded asset if contracts are withdrawn during an election cycle. The two-and-a-half-year construction period is exceptionally long and likely to be highly disruptive, with evidence from other solar NSIPs showing that such impacts are routinely underestimated. The inclusion of a large Battery Energy Storage System introduces additional fire and explosion risks that have not been convincingly mitigated.

The application fails to demonstrate that reasonable alternatives have been considered, including using brownfield sites, rooftop solar, or reducing its scale. It shows no material change to site selection, scale, or the extensive use of Best and Most Versatile agricultural land in response to statutory consultation feedback. Finally, the claimed energy benefits are overstated, relying on nominal capacity rather than actual seasonal output, which is modest and mismatched to demand.

For these reasons, and the information set out in Annexes A and B, I consider that the adverse impacts of this proposal substantially outweigh its benefit and I respectfully urge the Examining Authority to give substantial weight to the evidence that its contribution to national energy needs will be modest, while its harm to North Bedfordshire's productive farmland and rural communities are immediate and long-lasting. There are other smaller solar farms in North Bedfordshire, however, I believe the proposal for East Park Energy Solar Plant to be an inappropriate development for the area. As the Member of Parliament for North Bedfordshire, I strongly object to the Proposed Development.

Annex A: Construction risk, deliverability and enforcement – evidence from a comparable solar NSIP

1. Purpose of this Annex

This Annex is submitted to assist the Examining Authority in assessing the construction-phase impacts, deliverability risks and enforcement reliability associated with large-scale solar Nationally Significant Infrastructure Projects (NSIPs), drawing on evidence from the Cleve Hill Solar Park.

It responds directly to the requirements of National Policy Statement EN-1, particularly in relation to:

- Construction impacts and disturbance
- The credibility and deliverability of mitigation
- Reliance on Development Consent Order (DCO) controls
- The disproportionate effects of large infrastructure projects on small rural communities

This evidence is directly relevant to the East Park Energy proposal, which is of greater scale, longer duration and similar rural context.

2. Policy context (EN-1)

This Annex is particularly relevant to the following provisions of EN-1:

- Paragraphs 4.3.3 – cumulative impacts
- Paragraphs 4.2.11-4.2.12 – avoidance, mitigation and deliverability of mitigation
- Paragraph 1.1.7 – consultation and responsiveness to community concerns
- Paragraphs 5.3-5.14 – construction impacts, traffic, noise and disturbance
- Paragraph 5.13 – impacts on local communities and quality of life

EN-1 requires decision-makers to consider not only whether mitigation is proposed, but whether it is realistic, enforceable and effective in practice.

3. Cleve Hill Solar Park – overview and relevance

Cleve Hill Solar Park was:

- The first solar NSIP to receive a DCO in England
- Approximately 1,000 acres in size
- Located adjacent to a small rural settlement (Graveney, Kent)
- Approved with extensive reliance on Construction Transport Management Plans and DCO conditions.

Construction commenced in 2023 and continued for around 18 months, with further disruption arising from associated battery energy storage development.

During the examination of Cleve Hill, local communities raised concerns closely mirroring those now raised in relation to East Park Energy. The construction experience has demonstrated that many of those concerns were well founded.

4. Construction traffic impacts

Despite approved Construction Transport Management Plans:

- Narrow rural roads were subjected to sustained heavy HGV traffic, often in convoys
- Traffic volumes and behavioural impacts exceeded expectations
- Road surfaces, verges, village greens and private property were damaged
- Noise, dust and vibration impacts were prolonged and cumulative

These impacts occurred despite DCO controls, demonstrating that reliance on management plans does not guarantee protection for rural communities.

This evidence is directly relevant to East Park Energy, which proposes:

- A longer construction period (approximately 30 months)
- A significantly larger site area
- Use of rural road networks of comparable or greater vulnerability

5. Failure of mitigation and enforcement

EN-1 requires that mitigation measures be both effective and deliverable.

At Cleve Hill:

- Construction methods were altered during the build (including piling techniques) materially increasing noise and disturbance
- Local authorities lacked the resources or willingness to proactively enforce DCO conditions
- Residents were effectively forced into informal monitoring and enforcement roles

This demonstrates a clear risk that mitigation measures proposed for East Park Energy may fail in practice, particularly given the scale of the project and the rural enforcement context.

6. Duration and intensity of "temporary" impacts

At Cleve Hill:

- Construction occurred six days per week
- Working hours extended from early morning to evening
- Noise, drilling, reversing alarms and traffic movements were continuous over many months

While described as "temporary", the intensity and duration of impacts resulted in significant loss of amenity, stress and reduced quality of life for residents.

For East Park Energy, with its greater scale and longer construction programme, similar or greater impacts should be anticipated.

7. Drainage, flooding and land management issues

Despite approved drainage strategies at Cleve Hill:

- Drainage infrastructure was damaged during construction
- Watercourses were inadequately maintained
- Localised flooding occurred

These issues arose during construction and persisted beyond it, highlighting the risk of unintended consequences on agricultural land and neighbouring properties at East Park Energy.

8. Battery energy storage system (BESS) risks

At Cleve Hill:

- Battery energy storage development was progressed separately from the original solar consent
- Community concerns regarding fire and explosion risk were not meaningfully addressed
- Emergency response planning lacked transparency and community involvement

Given that East Park Energy proposes a substantial BESS component, this precedent raises serious concerns regarding:

- Safety governance
- Emergency preparedness
- The adequacy of mitigation and oversight

9. Cumulative impact implications

The Cleve Hill experience demonstrates that:

- Construction impacts compound over time
- Multiple phases and associated infrastructure extend disruption
- Small rural communities are particularly vulnerable to cumulative harm

This evidence is directly applicable to East Park Energy, which forms part of a wider cluster of solar developments, increasing the likelihood of prolonged and overlapping impacts.

10. Consultation and community confidence

Early assurances given to the Cleve Hill community did not translate into on-the-ground outcomes during construction.

As a result:

- Community trust was eroded
- Conflict increased
- The perception of a lack of accountability intensified impacts

This reinforces the importance of giving weight to consultation failures identified in the East Park Energy application.

11. Conclusion of Annex A

The Cleve Hill Solar Park provides compelling real-world evidence that:

- Construction impacts of large solar NSIPs are routinely under-estimated
- Reliance on DCO conditions and management plans is often misplaced
- Enforcement in rural contexts is weak and inconsistent
- Communities bear disproportionate and prolonged harm

This evidence is directly relevant to the assessment of the East Park Energy proposal.

The Examining Authority is therefore invited to give substantial weight to this Annex when considering the credibility of construction assumptions, the effectiveness of proposed mitigation, and the overall acceptability of the Proposed Development.

Annex B: Energy output, capacity factors, seasonal mismatch and curtailment

1. Purpose of this Annex

This Annex provides technical evidence on the relationship between installed solar capacity, actual energy output, seasonal performance and curtailment, directly relevant to the East Park Energy proposal under EN-1.

2. Capacity factors and seasonal performance

Independent modelling by Professor Tony Day shows UK grid-scale solar capacity factors averaging 9.5–11% annually, with the lowest performance occurring in Q1 and Q4 when electricity demand is highest.

3. Curtailment and system inefficiency

At higher levels of installed capacity, solar output increasingly exceeds demand during summer periods, resulting in:

- Significant curtailment
- Increased system costs
- Displacement of other generation

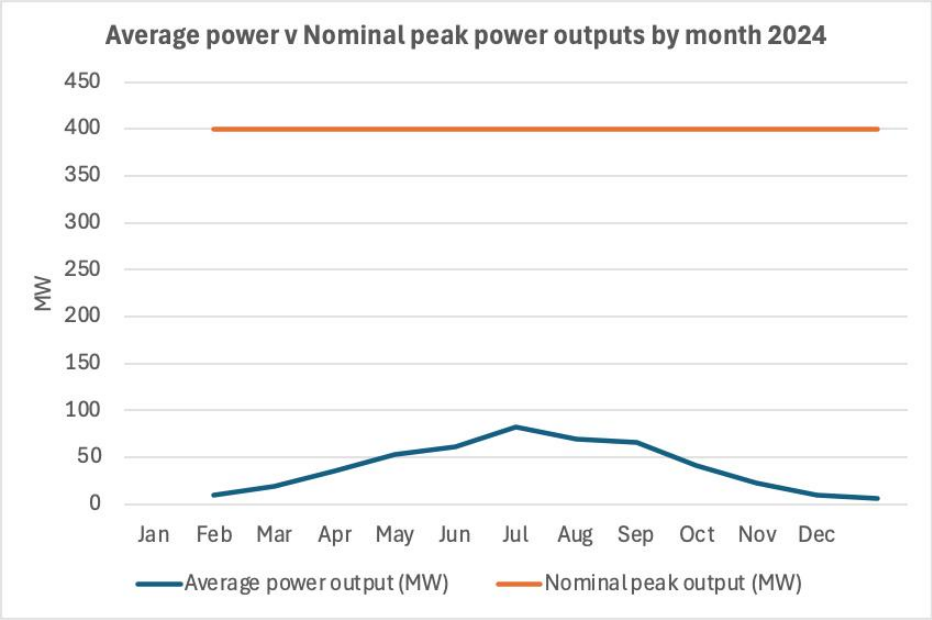
Battery storage mitigates only a small proportion of this effect and cannot resolve seasonal mismatch.

4. Land-use efficiency

Professor Day's modelling demonstrates that achieving higher solar contributions would require exceptionally large land areas, predominantly agricultural land, with diminishing marginal energy returns.

5. Relevance to the planning balance

When assessed against real-world output and system performance, the scale of harm proposed by East Park Energy is not justified by the energy benefits delivered, contrary to EN-1.



Graph shows power outputs by month for a 400MW system, comparable to East Park Energy, using data from 2024

Link to 'Modelling of GB grid-scale solar PV generation: impacts of the new category of solar power plant on the national energy system':
https://drive.google.com/file/d/1_EGZ6kv4o1A4V_OY76HjyBBu5ZS7XZ2i/view