

Stop East Park Energy (SEPE) – Summary of Issues for Registration as an Interested Party

Who SEPE is and why it has standing

Stop East Park Energy (SEPE) is an independent, unfunded, community-led group formed in direct response to the proposed East Park Energy Solar and Battery Energy Storage System (BESS) Nationally Significant Infrastructure Project. SEPE comprises residents, landowners and stakeholders drawn from across the communities affected by the Order Limits and associated construction and grid-connection corridors. The group has the registered support of in excess of 900 individuals from impacted parishes and settlements, reflecting the geographically dispersed nature of the scheme's effects. This breadth of support enables SEPE to present consolidated, evidence-based submissions on environmental, agricultural, amenity and procedural matters affecting multiple communities.

SEPE acts in the public interest and is not opposed to renewable energy or national decarbonisation objectives. Its concern is that nationally significant infrastructure must be lawfully sited, evidence-based, environmentally proportionate and procedurally robust, in accordance with the Planning Act 2008, the Infrastructure Planning (EIA) Regulations 2017, the National Policy Statements (EN-1 and EN-3) and the National Planning Policy Framework.

Overview of SEPE's principal issues

SEPE considers that the East Park Energy application raises fundamental policy, evidential and legal concerns that prevent the proposal from being lawfully determined in its current form. These concerns include, but are not limited to, the following broad issue categories.

1. Mis-siting and loss of Best and Most Versatile (BMV) agricultural land

The proposal involves the long-term industrialisation of extensive areas of high-grade agricultural land. SEPE is concerned that the Applicant has failed to apply a transparent and lawful sequential site-selection process or to demonstrate necessity, as required by EN-1, EN-3 and the NPPF. The scale, duration and cumulative nature of agricultural land loss raise issues of national food security, soil function and long-term land stewardship.

2. Absence of a lawful alternatives assessment

SEPE is concerned that reasonable alternatives, including lower-grade agricultural land, brownfield land, rooftop and commercial-estate capacity, and alternative configurations within viable grid-connection distance have not been properly assessed. The absence of a lawful alternatives analysis has implications for compliance with national policy and for the adequacy of the Environmental Statement under the EIA Regulations.

3. Incomplete environmental baseline and deferred assessment

SEPE identifies significant gaps in baseline data and assessment across multiple topics, including agricultural land classification, soils, hydrology, ecology, landscape and heritage. Key matters are deferred to post-consent plans or outline strategies, preventing the Examining Authority from assessing likely significant effects with the certainty required by EIA Regulation 18(3).

4. Battery Energy Storage System (BESS) safety and pollution risk

The co-located Battery Energy Storage System introduces foreseeable major-accident, fire, pollution and public-safety risks for which no quantified risk assessment has been provided at examination stage. SEPE is concerned that the Environmental Statement relies on high-level assurances and defers critical analysis, including thermal-runaway scenarios, plume dispersion, fire-water contamination pathways and emergency access, to post-consent stages. Given the proximity of homes, Public Rights of Way, agricultural land and strategic buried infrastructure, SEPE considers that the absence of quantified, site-specific risk evidence prevents the Examining Authority from lawfully assessing vulnerability to major accidents or disasters, as required by the EIA Regulations and EN-1. The justification for locating such infrastructure in this rural setting has not been demonstrated.

5. Landscape, amenity, noise, lighting and Public Rights of Way impacts

The scale, linear extent and multi-site configuration of the proposed development give rise to significant concerns regarding landscape character, tranquillity, visual amenity, noise, lighting and the experience and safety of Public Rights of Way users. SEPE is particularly concerned that the Environmental Statement underestimates the effect of sustained, corridor-based development on rural character and recreational amenity across multiple parishes. SEPE considers that the assessment does not adequately address the cumulative and experiential impacts on PRowWs, including repeated enclosure, loss of openness, fencing effects, lighting intrusion and interaction with construction traffic. Mitigation relies heavily on future planting and outline measures without enforceable delivery mechanisms or evidence of effectiveness, preventing the Examining Authority from determining whether impacts can be acceptably mitigated over the lifetime of the scheme.

6. Construction and transport impacts on rural road network and communities

The proposed development gives rise to substantial and prolonged construction traffic impacts across a network of rural, constrained roads and villages that are not designed to accommodate sustained heavy goods vehicle (HGV) movements. SEPE is concerned about the adequacy of the Applicant's assessment of traffic routing, road capacity, safety and community impacts, including:

- the suitability of local roads serving affected villages to accommodate high volumes of HGVs over a multi-year construction period;
- the absence of effective safeguards for school bus routes, pedestrian movements, cycling, and daily commuting, particularly during peak hours;
- the potential for traffic displacement and 'rat-running' through villages and along secondary routes, including knock-on impacts to the B645, B660 and connecting corridors to the A14 and A1; and

- the reliance on outline or post-consent traffic management measures without enforceable routing controls, monitoring, or sanctions.

SEPE contends that the Environmental Statement does not provide sufficient, robust or enforceable evidence to demonstrate that construction and operational traffic impacts can be safely accommodated without unacceptable harm to highway safety, residential amenity, or the functioning of local communities, contrary to EN-1, the EIA Regulations and established NSIP practice.

7. Ecology and biodiversity

SEPE has concerns regarding the completeness and reliability of the ecological baseline, the assessment of species impacts, habitat fragmentation and cumulative effects across a large, linear development footprint. In particular, SEPE is concerned that the Environmental Statement does not apply a precautionary, pathway-based assessment of ecological risk consistent with Natural England's Evidence Review NEER012, which identifies uncertainty and potential ecological-trap effects associated with large-scale solar arrays, including impacts on insects, bats, birds and riparian species. SEPE considers that the reliance on qualitative judgements, limited seasonal survey data, and future mitigation through outline or post-consent management plans prevents the Examining Authority from assessing likely significant ecological effects with the degree of certainty required by the EIA Regulations. The absence of robust cumulative assessment and enforceable biodiversity safeguards raises concerns regarding legal adequacy and long-term ecological resilience.

8. Heritage and archaeology

SEPE notes the deferral of archaeological evaluation and significance assessment to post-consent stages, including reliance on future Written Schemes of Investigation. This raises concerns regarding compliance with the EIA Regulations and the statutory duties relating to heritage assets and their settings.

9. Draft Development Consent Order deficiencies

SEPE is concerned that the Draft DCO does not secure, with sufficient clarity or enforceability, the mitigation relied upon in the Environmental Statement. Across multiple topic areas including soils, hydrology, traffic, noise, lighting, Public Rights of Way protection, decommissioning, BESS safety and financial security, key controls are deferred to outline strategies, post-consent approvals or contractor discretion. SEPE considers that this approach prevents the Examining Authority from being satisfied that impacts can be effectively controlled, monitored or enforced, and undermines the legal certainty required for a Development Consent Order. The reliance on future approvals mirrors deficiencies identified in other NSIPs and raises material concerns regarding deliverability and compliance over the operational life of the scheme.

10. Compulsory acquisition, necessity and public interest

SEPE questions whether the Applicant has demonstrated a compelling case in the public interest for compulsory acquisition and long-term control of land, particularly where the use of high-grade agricultural land has not been shown to be necessary.

11. Consultation adequacy and procedural fairness

SEPE shares the concerns expressed by stakeholders regarding the adequacy of pre-application consultation, changes to the scheme post-consultation, and the ability of affected communities to engage meaningfully on the basis of complete and intelligible information.

12. Need, proportionality and planning balance

SEPE considers that the Applicant relies heavily on generic national “need” statements without demonstrating that this specific scheme is necessary, efficient or proportionate when weighed against its environmental, agricultural and community impacts.

13. Community impacts and governance

SEPE is concerned about the absence of enforceable mechanisms for community protection, monitoring, compliance and long-term accountability. Without prejudice to its primary case, SEPE also considers that any voluntary community benefit arrangements should be transparent, generation-linked and future-proofed if consent were contemplated.

Purpose of SEPE’s participation

SEPE registers as an Interested Party to ensure that the Examination is informed by evidence-based, legally grounded scrutiny of the proposal, and to assist the Examining Authority in identifying evidential gaps, policy conflicts and procedural risks. SEPE intends to submit a full Written Representation at Deadline 1 expanding on the above matters, supported by technical evidence, policy analysis and legal authorities. SEPE’s participation is intended to assist the Examining Authority in discharging its statutory duties under section 104 of the Planning Act 2008 and Regulation 18(3) of the Infrastructure Planning (EIA) Regulations 2017.

SEPE respectfully requests that the Examining Authority treat this Summary of Issues as intentionally broad, reflecting the breadth of environmental topics required to be assessed cumulatively and interactively under the Infrastructure Planning (EIA) Regulations 2017, so that all matters relevant to environmental effects, policy compliance, legal adequacy and public interest may be addressed fully during the Examination process.

13 January 2026

contact@stopeastparkenergy.com