

26 May 2026

██████████
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford MK42 9AP

Dear Mr ██████████

East Park Energy DCO (EN010141) – SEPE Deadline 3 submission

Further to our letters to you of 2 and 29 April 2026, which provided the Stop East Park Energy (SEPE) Written Representation and the relevant SEPE submissions at Deadline 2, we are writing to you again to share our Deadline 3 submission.

We appreciate Bedford Borough Council’s ongoing scrutiny of the East Park NSIP.

Please find attached SEPE’s response to the ‘Applicant Response to Stop East Park Energy’, which focuses on a selection of key issues, shares new information and concerns, and sets out relevant Examining Authority questions alongside additional questions of our own.

Principal issues detailed in this submission include:

- Emerging uncertainty over the deliverability and viability of the proposed Battery Energy Storage System (BESS), including unresolved grid connection arrangements and questions over whether the battery element can properly be treated as an integrated part of the solar power project.
- Concerns regarding the likely operational role of the BESS, including questions over its stand-alone status in relation to likely extensive grid import/export trading, wider arbitrage activity, and associated implications for carbon impacts, safety, maintenance and planning justification.
- Continued concerns regarding battery safety, including reliance on substantial post-consent approvals and future technical assessments.
- SEPE analysis suggesting that sample construction traffic calculations may indicate significant wider flaws and inconsistencies within the Applicant’s traffic modelling and headline vehicle movement assumptions.

- Substantial unresolved traffic and highway safety concerns, including apparent omissions in accident data, uncertainty over lifecycle replacement and decommissioning impacts, and ongoing concerns regarding the robustness of proposed construction traffic management and mitigation measures, particularly in light of real-world construction impacts experienced during delivery of the Cleve Hill Solar Park NSIP in Kent.
- New lifecycle carbon analysis undertaken by SEPE, including alternative emissions calculations for selected major Scheme components and activities, which suggest greenhouse-gas emissions associated with the Scheme could be materially higher than those presented by the Applicant.
- Ongoing concerns regarding funding, restoration and long-term deliverability, including the adequacy of financial security arrangements, and the practical enforceability of decommissioning and site restoration obligations over the lifetime of the Scheme, particularly given the likelihood of changes in ownership over time.
- Continued concerns regarding ecology and nature conservation, including uncertainty over aspects of the ecological baseline and environmental impact assessment, together with concerns arising from the Applicant's Statements of Common Ground with the Environment Agency and Natural England, where SEPE's ecology expert considers a number of important ecological issues remain unresolved or inadequately addressed.

We hope you find this helpful and would be pleased to provide any further information if required.

Yours sincerely,

Stop East Park Energy
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