

14 July 2026

To: National Highways, Bedford Borough Council, Cambridgeshire County Council and Huntingdonshire District Council

cc: Richard Fuller MP, Ben Obese-Jecty MP

Dear all

East Park Energy EN010141: Construction traffic and transport – technical evidence and critical issues for further examination

Firstly, we would like to thank you for your ongoing scrutiny of the East Park Energy DCO application. We are writing to you now as statutory consultees, to draw your attention to the Stop East Park Energy (SEPE) community group's Deadline 4 submission on construction transport and traffic issues, which will shortly form part of the Examination record.

Although this letter focuses specifically on our submission on construction traffic and transport, that document forms part of a wider package of Deadline 4 submissions, continuing a broader body of work through which our community has consistently raised concerns across a wide range of issues throughout the Examination. Our group's Deadline 4 submissions:

- identify errors and inconsistencies in the Applicant's **carbon calculations**, and present alternative technical analysis that indicates the Scheme is likely to generate more greenhouse gas emissions than it saves
- highlight, with reference to the Applicant's failure to secure a stand-alone grid connection for the battery system, a material **discrepancy between what is set out in the Application and the operational reality of the Scheme** currently under examination
- point to open-ended proposals for **replacement campaigns** which could see multiple consecutive sub-threshold solar panel replacement cycles take place with limited local authority oversight, or the rollout of replacement programmes at a scale significantly above the proposed 20% threshold, alongside ill-defined powers for local planning authorities

- emphasise concerns over the loosely defined parameters for the **design and spec of the 100MW battery system**, despite the documented safety risks associated with these utility-scale energy storage banks
- question the Applicant's resistance to an end-of-life **decommissioning and restoration bond** when National Gas seeks financial safeguards against "low risk, but highly damaging outcome[s]", even though decommissioning is an integral part of the DCO for this "temporary" Scheme, promoted through an SPV

Collectively, these submissions present a pattern of apparent errors, omissions, unsupported assumptions and inconsistencies in the Application, some of which have already been acknowledged by the Applicant.

The sixth of our Deadline 4 submissions, on **construction transport and traffic**, represents one of the most significant issues for our rural community, which depends on a constrained local road network. The attached submission brings together concerns previously raised, alongside additional points identified through continuing review of the Application – from outstanding questions on U-turning HGV traffic, to broader decommissioning issues, including unresolved ambiguities and a lack of detail across key aspects. Our overarching contention is that pivotal matters are being overlooked or downplayed in the Examination. Taken together, we consider these matters warrant more careful scrutiny in light of their potential implications for, *inter alia*, community safety and local disruption over a prolonged period.

Given the significance of the issues identified, we hope this submission will assist all parties in their consideration of the Application. We recognise that as statutory consultees, your submissions carry greater weight, and we would welcome your focus on these critical matters, which we respectfully suggest should be considered as part of your Statements of Common Ground.

We would be happy to arrange a call or meeting to discuss any of the SEPE submission on construction transport and traffic in further detail, to help inform your submissions at the few remaining deadlines before the Examination closes. Our group includes professionals from a wide range of relevant disciplines, including civil engineering, construction, traffic, transport, highways and the DCO process.

With thanks again for your close engagement with the Application to date.

Yours sincerely

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