



HOUSE OF COMMONS

LONDON SW1A 0AA

East Park Energy
Brockwell Storage and Solar
Ground Floor Offices
16 Stratford Place
London W1C 1BF

29th October 2024

Dear Sir/Madam,

Response to East Park Energy Statutory Consultation

As the Member of Parliament for North Bedfordshire, where the majority of the East Park Energy solar project is proposed, I am writing to submit my objection. It is clear this proposal is too large in scale, too destructive of local farmland, and has failed to gain sufficient public support to be considered a positive contribution to our national transition to renewable energy production.

My primary concern is the loss of 74% of Best and Most Versatile (BMV) agricultural land that will arise from this proposal. This proportion is far higher than recent comparable projects such as Sunnica and Cottam (4%), Gate Burton (9%), and Mallard Pass (25%). If this proposal is accepted, it would make a mockery of government guidelines and unleash a “free for all” grab for farmland across the country endangering food security.

I am also concerned about the project’s scale, the lack of clear financial provisions for decommissioning, the potential environmental and transport impacts during its three-year construction period, the lack of transparency on the ethical sourcing of solar panels, inadequate direct compensation for affected residents, and the missed opportunity to use existing warehouse rooftops instead of agricultural land for solar energy generation.

Whilst I appreciate the rights of landowners and financial institutions to make a return on their investment, our transition to net zero must not be governed by the attractiveness of short-term financial returns and arbitrary timelines. A long-term view of the most appropriate, most efficient distribution of power generation across the United Kingdom is the better assessment method and it is a test that, as proposed, East Park Energy does not fit.

North Bedfordshire has many other renewable sites in place or proposed. I urge you to reconsider the scale and land use of this proposal but in the meantime, I record my strong objection to this proposal.

Sincerely,

A handwritten signature in black ink that reads "Richard Fuller".

Richard Fuller CBE MP

Richard Fuller CBE MP
Submission to East Park Energy Statutory Consultation
October 2024

1. The East Park Energy Proposal Removes Too Much Agricultural Land

The key concern about this proposal is the proportion of land it will take up that is graded as Best and Most Versatile land (BMV).

The land proposed is 74.4% BMV land. Other comparable scale solar farms contained 4% BMV (Sunnica and Cottam), 8% BMV (Gate Burton) and 25% BMV (Mallard Pass).

The technical report shows that 24% of the agricultural land is very good quality (grade 2), 50% is good (grade 3a) and 24% is moderate quality (grade 3). In a time when food security is becoming an increasingly urgent issue, repurposing productive farmland for energy generation could have long-term consequences.

The consultation brochure states that BESS layout Option 1 would deem 5.67 hectares (14 acres) of BMV land permanently adversely impacted and BESS layout Option 2 would deem 6.68 hectares (16.5 acres) of BMV land permanently adversely impacted.

The use of this land for solar panels would reduce the availability of locally grown food, increase reliance on imported goods and diminish the sustainability of the region's agricultural industry.

The loss of arable land also has social implications, affecting other individuals and businesses who rely on a strong local farming sector.

2. The East Park Energy Proposal is Too Large

The proposed East Park Solar site, covering 766 hectares (1,900 acres), would vastly exceed the size of existing local solar farms; it is over 14 times the area of Manor Farm Solar Farm Pertenhall (36 acres) and more than 7 times the size of the UK's largest currently operating solar farm, Shotwick Solar Park (250 acres). In comparison, the current local sites are far smaller and more modest in scale.

A project of this scale will have a considerable visual impact on the surrounding landscape – indeed East Park Energy will BECOME the landscape in many parts of the countryside.

The height of the solar panels and the installation of fencing and other security measures will further adversely impact the visual landscape.

The proposal will affect long-standing public footpaths and rights of way creating disruptions to the landscape.

3. East Park Energy Does Not Provide Sufficient Plans for Decommissioning

There is a lack of clarity regarding the financial arrangements for the eventual decommissioning of the solar farm.

East Park Energy should provide upfront the capital required to decommission the solar plant and return the land to its original state at the end of the project's lifespan. These funds should be placed in an independent escrow, ideally administered by the local authorities concerned.

The absence of a clearly defined escrow fund or financial plan for this phase of the project raises concerns about who will bear the financial burden of decommissioning if such a fund is not properly managed or allocated. Without transparency in this area, there is a risk that local communities or future generations could be left with environmental and financial liability.

The consultation brochure (page 28) states that the remainder of the best and most versatile (Grade 2 and Grade 3a) land in the proposal could be reverted to its existing agricultural condition upon completion.

The brochure does not however provide any details or plans to explain how this will happen. On Page 30 the brochure simply states, "*The site will be returned to a condition suitable for return to its original use after decommissioning*".

What specific plans does Brockwell Energy have to ensure grade 2 and grade 3a land will be reverted to its existing agricultural condition?

4. East Park Energy Will Create Substantial Disruption

Brockwell Energy's brochure (p. 29) states that the construction phase for the East Park Energy project is expected to last up to three years, employing 500-850 workers, with hours from 8am to 6pm, Monday to Friday, and 8am to 1pm on Saturdays.

Four access roads have been identified, all on B or C roads, including the B645 at Site D, which will see substantial HGV traffic with 7,231 deliveries expected during construction (PIER report, Ch. 9, p. 46). The B645, a busy route between Great Staughton and Hail Weston, will likely experience considerable disruption.

North Bedfordshire is already experiencing disruption from the construction of the Black Cat Roundabout on the junction between the A1 and A421. This is a very large national road project and is located in the same local government ward as much of East Park Energy's proposed construction.

In addition to travel disruptions, the construction is expected to generate noise, vibration, dust, and vehicle and machinery fumes. Could Brockwell Energy clarify the following:

1. What measures are planned to minimise disruption on the B645 and surrounding areas?
2. How will noise, dust, and fumes be managed to reduce impact on local communities?
3. Are there plans for alternative access routes to mitigate the load on the smaller roads?

5. East Park Energy Proposal's Supply Chain Raises Ethical Questions

The supply chain for the solar panels required for this project touches on significant ethical concerns.

There is evidence of the use of forced labour within the supply and manufacturing process for solar panels.^[1] Brockwell Energy maintains an anti-slavery statement on its website, as required under the Modern Slavery Act. However, there is no public indication that Brockwell Energy has joined the solar industry's anti-slavery initiative, the [Solar Stewardship Initiative](#).

Considering [Brockwell's anti-slavery statement](#), there should be complete disclosure of the solar panel manufacturers that will be used for East Park Energy. Further, Brockwell Energy should provide information on the steps it will take to ensure these panels are ethically sourced and produced throughout the whole of the supply chain.

7. East Park Energy's Proposal for Compensation for Residents is Opaque and Insufficient

There is no information in the documentation provided about direct compensation Brockwell Energy will provide to residents affected by the proposed site. Informal indications from other projects suggest the levels provided will be small, and uncertain and represent a bare fraction of the profits that will be made by investors.

The siting of infrastructure usually involves a "social contract" between those who will, rightly, benefit from their investment and those whose communities have been impacted. With a project of such a significant scale, the impact on local people will be greater. As such it should be anticipated that East Park Energy will share a more significant proportion of its profits. The Proposal does not provide confidence that this is appreciated by Brockwell Energy.

Some specific households will experience significant losses from the project. For some, these losses will only be made clear after the three-year construction period is completed or when they seek to sell their property. East Park Energy should confirm that it will reimburse, in full, all households affected including for any reduction in the values of homes or land that can reasonably be traced to any decision to proceed with its proposal.

8. Use of Rooftops on Existing Warehouses

A missed opportunity in the East Park Solar proposal is the lack of consideration for using existing rooftops on Bedfordshire's large warehouses and industrial buildings, which could support solar installations without sacrificing valuable agricultural land. Rooftop solar has several advantages:

- It protects productive farmland and food security.
- It is less disruptive to the landscape and local communities.
- It places energy generation closer to demand centres, reducing transmission losses and improving efficiency.

Brockwell Energy should clarify if it has assessed the feasibility of rooftop solar on local industrial sites.

[1] Crawford, A., & Murphy, L. T. (2023, November 2). *Over-Exposed; Uyghur Region Exposure Assessment for Solar Industry Sourcing*. Sheffield Hallam University. Retrieved October 29, 2024, from <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>