



EAST PARK ENERGY

East Park Energy

EN010141

Consultation Report Appendices Part 5

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Infrastructure Planning (Applications: Prescribed Forms and
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EAST PARK ENERGY

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Consultation Report Appendices Part 5

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CONTENTS

**Appendix 5-1 Consultation Report Appendix 5-1: Regard had to
Section 42(1)(a) and (1)(b) responses [EN010141/DR/5.2]**

**Appendix 5-2 Consultation Report Appendix 5-2: Regard had to
Section 42(1)(d) responses and 47 responses [EN010141/DR/5.2]**

**Appendix 5-3 Consultation Report Appendix 5-3: Regard had to non-
prescribed consultee responses [EN010141/DR/5.2]**

APPENDIX 5-1 CONSULTATION REPORT APPENDIX 5-1: REGARD HAD TO SECTION 42(1)(A) AND (1)(B) RESPONSES [EN010141/DR/5.2]

Table 1.1: Abbotsley Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Location, brownfield sites, alternatives	Councillors would prefer to see solar power generated from brown fields sites, and do not wish to see these sited on good quality agricultural land.	N	<p><u>Use of brownfield land</u></p> <p>In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land. However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own. This is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2].</p> <p><u>Use of agricultural land</u></p> <p>Further to this, and as set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>The Applicant has provided an assessment of the Scheme on Land and Soils in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p> <p>An outline Soil Management Plan [EN010141/DR/7.9] has been prepared which sets out how soils will be sensitively managed across the lifetime of the Scheme.</p>
		Alternatives	[Councillors] would also prefer to see solar panels sited on existing buildings.	N	<p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops.</p>
		Visual impact	The proposed site is located in the vicinity of the River Kym and the adjacent valley. It will be detrimental to this area.	N	<p>The Applicant has carefully considered the landscape and visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] of the application.</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>from several locations, reducing the visual impact of the Scheme at these locations. This, combined with proposed mitigation planting, means that whilst there would be an adverse impact on landscape character, there will not be long-term residual significant effects (in EIA terms) once mitigation planting has established.</p> <p>The Scheme is being applied for on a temporary (albeit long-term) basis, and post-decommissioning the landscape would be restored with the removal of the Scheme. Any planting proposed as part of the Scheme would be retained at decommissioning and handed back to the landowners.</p>
		Consultation materials	Councillors considered that the feedback form on the project website, for seeking views, has leading questions.	N	<p>The Applicant considers that the feedback form produced for the 2024 statutory consultation did not include leading questions. As part of the feedback form, the Applicant sought views specifically on whether respondents supported or opposed each aspect of its proposals, with text boxes for additional written comments provided.</p> <p>Whilst the feedback form did seek feedback on specific areas of the Applicant's proposals, at question 10 it also invited respondents to give comments on any topics they did not believe had been sufficiently covered by previous questions.</p>

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					Furthermore, whilst the Applicant encouraged people to submit responses via the feedback form during the 2024 statutory consultation, free text responses (which did not need to follow the structure of the feedback form) could also be submitted by email or post.

Table 1.2: Anglian Water

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Existing water infrastructure, mitigation.	<p>THE SCHEME – ANGLIAN WATER EXISTING INFRASTRUCTURE</p> <p>Anglian Water would want to ensure the location and nature of these assets is identified and protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impacts on services if construction.</p> <p>Anglian Water's preference is to work with the applicant during the pre-application phase to reach agreement on design changes, mitigation and protection measures in the application prior to submission. We would welcome further engagement to ensure that Anglian Water and the project have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination.</p>	N	The Applicant notes these comments.
		Construction	Through this consultation on the most current proposals, I do need to raise that certain safeguards will need to be in place regarding the strategic water mains that run through the proposed development boundary (including within Sites C and D), both in terms of the access road and siting of the solar array. We		The Applicant has included Protective Provisions within Schedule 10 of the draft DCO [EN010141/DR/3.1] for Anglian Water.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			would welcome further discussions with the project team as advice on the form and content of suitable Protective Provisions was provided to them on 1 st July 2024.		
		Construction	We welcome the intention to produce a Construction Management Plan (CEMP) and that appropriate (section 4.1.28 Appendix 2-3: Outline Construction Environmental Management Plan). The detailed CEMP should confirm steps to remove the risk of damage to Anglian Water assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. Further advice on minimising and then relocating (where feasible) Anglian Water existing assets can be obtained from: connections@anglianwater.co.uk .	N	The Applicant notes these comments. The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] as part of the application, which includes measures to identify and protect utilities during construction.
		Water resources and supply, BESS, fire risk associated with BESS	In view of the guidance in the National Policy Statements, we welcome reference to water resources and usage in the PIER. This states that: Water requirements during the construction phase will be drawn from a licensed and approved source. This will also include water supply for toilet/welfare facilities. The water resource requirements during operation would include storage for battery fire water, water for the periodic washing of solar	N	The Applicant has set out an assumption of the likely water requirements for the Scheme as part of ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] , and in the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Landscape and Ecological Management Plan [EN010141/DR/7.7] . The Applicant has included the Pump House east of Great Staughton within the Order Limits. Following discussion with Anglian

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>panels, and welfare facilities at the East Park substation. The BESS compound will have tanks for fire suppression. Water requirements will be met during operation from an appropriately licenses and approved source.</p> <p>I should be grateful for confirmation of any water requirements, given discussions with the project team which have involved looking at potential points of connection near Great Staughton for water supply purposes.</p>		Water, this was identified as a potential point of connection from which a piped water connection could be built to serve Site D.
		Surface water, drainage	The PEIR documents confirm that the scheme will be designed with no new mains foul connection and SuDs will be used for both the construction and operation stages.	N	The Applicant notes this comment. This remains the case, as set out in the application.
		DCO process, engagement, mitigation, construction	<p>Anglian Water would welcome the continuation of discussions with RNA Energy Ltd, in line with the requirements of the 2008 Planning Act and guidance. Continued engagement would serve to enable pre-submission agreement on Protective Provisions for those assets within the proposed order limits, and the submission of an agreed Statement of Common Ground with Anglian Water. This in turn reduces the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.</p> <p>We would recommend discussion on the following matters:</p>	N	<p>The Applicant has included Protective Provisions within Schedule 10 of the draft DCO [EN010141/DR/3.1] for Anglian Water.</p> <p>The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] as part of the application, which includes measures to identify and protect utilities during construction.</p> <p>As set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1], the Applicant will undertake pre-construction surveys as part</p>

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			<ul style="list-style-type: none"> • The Draft DCO Order including protective provisions specifically to ensure Anglian Water's services are maintained during construction. • Impact of development on Anglian Water's assets and the need for mitigation. • The design of the project to minimise interaction with Anglian Water assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs. • Pre-construction surveys. • Based on the above conclusions in the PEIR, confirmation that there is no requirement for potable and raw water supplies or recycling (surface water/ foul drainage) connections. 		<p>of the site preparation works, prior to confirming a detailed design.</p> <p>The Applicant has set out an assumption of the likely water requirements for the Scheme as part of ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2], and in the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p> <p>The Applicant has included the Pump House east of Great Staughton within the Order Limits. Following discussion with Anglian Water, this was identified as a potential point of connection from which a piped water connection could be built to serve Site D.</p>

Table 1.3: Bedford Borough Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	BESS facility, fire risk associated with BESS	While it is acknowledged that the National Fire Chiefs Council's 'Grid Scale Battery Energy Storage Systems planning – Guidance for Fire and Rescue Services' (November 2022; Version 1) is not adopted planning policy and carries no weight in determination, in light of a near total lack of planning policy with regards to BESS fire safety management, it is suggested that the matters raised in the Guidance suggesting the need for dual points of access (to address changing wind directions); the requirements for open water storage ponds to contain contaminated fire water (which may be subject to flooding, breaching and/or potential leaching of contaminated fire water into the surrounding ground water and water courses) which needs to be discharged safely as part of a fire management strategy; and, noting that the LPA Fire Officer may review the Promotor's fire management strategy but is not empowered to 'sign-off' such a strategy, that these matters find some address in the considerations, recommendations, and determination with the Promotor. This is stated in reference to the Illustrative Environmental Masterplan showing the proposed alternative location of the BESS facilities.	N	<p>The Applicant has prepared an outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10] as part of the application that sets out how the BESS will be managed safely across the lifetime of the Scheme. The oBSMP has been informed by the NFCC guidance.</p> <p>The BESS would be located within East Park Site D, which is within Cambridgeshire. The Applicant has been consulting with the Cambridgeshire Fire and Rescue Service on the approach to preparing the oBSMP.</p>

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		Engagement	It is noted in the PEIR Chp2 §2.4.51-54 and 2.4.58 that the Promotor has had initial discussions with the Cambridgeshire Fire and Rescue Service with regards to water storage tanks. This is most welcomed. Similar discussions should be held with Bedfordshire Fire and Rescue Service.	N	The Applicant consulted Bedfordshire Fire and Rescue under Section 42(a) of the Planning Act 2008 as part of its 2024 statutory consultation. A joint response with Cambridgeshire Fire and Rescue Service was subsequently submitted, and the Applicant has had regard to this feedback when developing its proposals.
		Cable route, highways	It is noted that the proposed cable route (Illustrative Environmental Masterplan Key Plan, Ref. Figure 2-2a; dated Sept 2024) crosses several public highways and consequently the Promotor will need to attain the necessary consent, including agreeing to s106/ s278 and other financial contributions prior to construction. These should be negotiated with the relevant local planning authorities, specifically noting that this will be a cross-boundary Application.	N	The Applicant is aware of the potential need for additional consents as part of the application, and has prepared an Other Consents and Licences Statement [EN0101041/DR/5.5] which sets out the anticipated position for other consents required as part of the Scheme.
		Decommissioning, ground contamination	It is noted that the Host Authority is not supportive of leaving underground ducting and cables in-situ at the Decommissioning Phase. The ducting and cables contain plastics and metals which are toxic and with gradual breakdown have the potential to leach into the surrounding ground and groundwater causing contamination. The Promotor should be obligated to return the Site, Cable Corridor, and possible servitudes within the Public Highways used by the proposed Development, free of such known contamination.	N	The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at decommissioning all solar modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be left in situ to reduce

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			It is noted that this approach would be supported by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 regarding long-term harm.		the environmental impact of excavation. This approach has been assessed in the ES [EN010141/DR/6.1] .
		Fire risk management	<p>The Institute of Environmental Management and Assessment defines major accident and/or risk as <i>'Events that threaten immediate or delayed serious environmental effects to human health, welfare and / or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g. train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events'</i>. This should be read alongside the Chief Fire Officer's Guidelines. It is therefore incumbent on the Promotor to prepare a management plan accordingly.</p> <p>While it is acknowledged that battery/ BESS fires are considered by the industry as rare, their occurrence should they occur should be seen as severe in terms of their impact on human health and potential environmental damage.</p> <p>While not a direct planning matter, this risk, and related insurance, should be stated as solely the responsibility of the Promotor for the duration of the Development.</p>	N	<p>The Applicant has prepared an outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10] as part of the application that sets out how the BESS will be managed safely across the lifetime of the Scheme. The oBSMP has been informed by the NFCC guidance.</p> <p>The Applicant has prepared an air quality assessment of unplanned emissions from an accidental Battery Energy Storage System (BESS) fire during the operation and maintenance of the Scheme has been undertaken. This is provided as an appendix to the outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10].</p> <p>The assessment has been undertaken using an atmospheric dispersion model to determine the determine the likely effects on human health from a potential BESS fire. The assessment concludes that based on the factors of distance to the nearest locations of human exposure and the anticipated short-term nature of a fire incident, there would be no significant air quality effects as a result of a BESS fire incident.</p>

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					The Site Operator will take responsibility for the BESS for the lifetime of the Scheme.
		Operational phase, efficiency of solar panels, construction activity	<p>Industry acknowledges that over time solar arrays lose their efficiency and are typically replaced on a circa 20-year time frame. Similarly, the batteries / BESS have a theoretical life span of 20-years. The time frame for this proposed Development is suggested as 40-years. In this regard, this replacement will generate considerable construction activity in say 20-years, comparable with the construction activity created at inception (i.e. it is not a benign Site for 40-years). Consequently, this replacement within the Operational Phase should have been addressed within the Environmental Statement and taken forward into the planning application. Currently this matter is not addressed.</p> <p>It is suggested that the Operational Phase recognises this replacement during the lifetime of the proposed Development and that any 'severity'/ significant effect identified and then mitigated in the Construction Phase should then also be applicable to the Operational Phase. This should then be drawn through in to related address.</p>	N	<p>Solar panels can potentially last for up to 40 years, but the Applicant acknowledges that they reduce in efficiency over time and therefore it is likely that panels will be replaced at some point over the forty-year lifespan. Panel replacement would be on an ad-hoc basis as and when required, and would not be a concentrated period of activity such as during the construction phase.</p> <p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>
		Manufacturing, decommissioning	Should the solar arrays and BESS be made outside the UK (currently 80% of all arrays are manufactured in China and exported); and, after c.20/40-years be decommissioned / recycled outside the UK (currently, the bulk of used solar	N	The Applicant has prepared ES Vol 2 Appendix 15-1: Greenhouse Gas Assessment [EN010141/DR/6.2] that assesses the embedded carbon in components of the Scheme, including in

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		ning, recycling	arrays are exported to and end up in landfill / landfill farms), then it is suggested that the international, cumulative impact should be acknowledged and addressed within the Promotor's submitted material. It is suggested that this statement is supported by the reading of the current High Court Ruling R (Finch) v Surrey County Council and others [2024] UKSC20, 20 June 2024, regarding effect generated by a development. It is noted that with current understanding, the short to long-term effects of solar array and BESS life-cycle supply chains are unknown to both the Host Authority and Promotor and consequently some caution has to be set-out in any future Application regarding such matters.		<p>transport from a potential point of origin outside of the UK.</p> <p>An assessment of the potential waste that could be generated by the Scheme is provided in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p>
		Operational phase, replacement, panel maintenance, decommissioning	In terms of both the Operational (replacement and maintenance) and Decommissioning Phases regarding the recycling of materials / waste, the Promotor should have some acknowledgement / reference to the Waste Electrical and Electronic Equipment Regulations 2013. For the purposes of compliance with the Regulations, a producer refers to those that: a) manufacture and sell electrical and electronic equipment (EEE) under their own brand in the UK; b) buy EEE and then make changes to rebrand the product and resell to the UK market (If the maker's brand appears on the equipment, then they are the producer); c) import EEE on a commercial basis into the UK; and, d) are established outside of the UK and supply EEE directly to the UK market by distance	N	<p>An assessment of the potential waste that could be generated across the lifetime of the Scheme is provided in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>An outline Waste Management Plan [EN010141/DR/7.12] has been prepared as part of the application.</p>

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			<p>selling (e.g. online, mail order or by phone). The definition of producer is sufficiently broad that businesses importing solar / PV panels for installation on large-scale commercial and renewable developments are likely to be included. All producers of EEE are legally required to register with an approved producer compliance scheme (PCS), an industry-managed take-back and recycling initiative. Through registration with a PCS, producers finance the cost of collection, treatment, recycling and disposal of both their own EEE placed on the UK market and any WEEE that their products replace. Potential evidence of registration could potentially be made a Condition.</p> <p>A more detailed assessment of the operational and decommissioning phases regarding the recycling of materials / waste is required by the EIA Regulations in terms of an assessment of long-term, transboundary effect.</p> <p>In this regard, the Promotor is referred to Schedule 4(5) of the EIA Regulations <i>'the description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union level or United Kingdom level which are relevant to the project...'</i>; and, Schedule 4(6) <i>'A description of the forecasting methods or</i></p>		

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			<i>evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved'. As a minimum, these matters should be addressed by the Promotor in supporting material to a future Application.</i>		
		Hazardous materials	Research on potentially hazardous materials used in solar panel manufacture indicates that different solar panels have different metals present in the semiconductor and solder. Some of these metals (for example lead and cadmium) are harmful to human health and the environment at high levels and may leach out / be released during repairs / maintenance to individual site panels, permeating into the local soils, ground water, and water courses. The same applies to BESS facilities.	N	<p>The Applicant notes the concern raised regarding the potential presence of hazardous materials in solar panels and battery energy storage systems (BESS). The specific technologies to be deployed will comply with all relevant UK and international standards.</p> <p>The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Waste Management Plan [EN010141/DR/7.12] that set out how materials will be handled, stored and disposed of in line with relevant regulations.</p>
		DCO process	It is noted that <i>'a detailed agricultural land classification is currently being undertaken across the Site, and this Chapter therefore presents a preliminary assessment of the likely impacts and effects of the Scheme'</i> . Consequently, the Host Authorities reserves the right to comment on this	N	The Applicant notes this comment. The updated agricultural land classification report can be found at ES Vol 2 Appendix 13-1 [EN010141/DR/6.2] .

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			chapter aspect through technical working groups and future consultation.		
		Post-decommissioning, soil quality	<p>Currently, there is no evidence that after decommissioning the Site will revert to arable use for food production/ habitat creation (with ref. NPS EN5 §2.0.25 'to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land'). Arable soil is a three-dimensional, living bio-habitat and there is very limited research regarding the actions required (in terms of augmenting soil nutrients) and duration to bring soil back to production potential after lying 40-years dormant. Consequently, the Promotor's address should be read with some caution.</p> <p>While the Promotor recognises the matter of soil health, NPS EN5 requires the Promotor to 'guarantee' bringing the soil back to its baseline ALC. The Promotor has submitted no such strategy.</p>	N	<p>The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts.</p> <p>At decommissioning, the Scheme will be removed as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the land will be handed back to the landowners, with the Applicant's leases ending. The Applicant cannot commit that following decommissioning the landowners would revert the land to arable farmland, however it is considered reasonably likely this would be the case. The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.</p>
		Construction, lifespan of	<p>PEIR CHAPTER 1: INTRODUCTION</p> <p>BBC would suggest that the statement '<i>construction is anticipated to commence in</i></p>	Y	The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme,

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		solar and BESS	<p><i>Summer 2027 and to be completed for operation in late 2029 or early 2030</i> is misleading. Industry acknowledges that, over time, solar arrays lose their efficiency and are typically replaced on a circa 20-year time frame. Similarly, the batteries / BESS have a theoretical life span of 20-years. The time frame for this proposed Development is suggested as 40-years. In this regard, this replacement will generate considerable construction activity in say 20-years, commiserate with the construction activity created at inception (i.e. it is not a benign Site for 40-years). Consequently, this replacement within the Operational Phase should have been addressed within the PIER and taken forward into the Environmental Statement and future planning application. Currently this matter is not addressed. Consequently, for completeness it is suggested that the Operational Phase recognises this replacement during the lifetime of the proposed Development and that any 'severity'/ significant effect identified and then mitigated in the Construction Phase may also be applicable to the Operational Phase. This should then be drawn through in to related address.</p>		<p>and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>
		Decommissioning, recycling, soil quality	<p>PEIR CHAPTER 2: THE SCHEME</p> <p><i>'The technology associated with solar development is advancing rapidly,...'</i>. In this regard, BBC refers the Promotor to the Executive Summary Issue No.5 (Manufacture, decommissioning and recycling) and Issue No. 6</p>	N	<p>The Applicant notes this comment. The assessment undertaken within the ES has assessed a reasonable worst-case scenario based on a 'Rochdale Envelope' and design parameters approach, as set out in Section</p>

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			<p>(Post-decommissioning: soil) in reference to Schedule 4(5) of the EIA Regulations <i>‘the description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union level or United Kingdom level which are relevant to the project...’</i>; and, Schedule 4(6) <i>‘A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved’</i>. The nature of both recycling of materials and re-establishment of arable soil are either unknown and/or unproven and consequently the current open-ended statements made by the Promotor in this regard needs some caveat and caution in both the 20-year replacement and 40-year decommissioning phase.</p>		<p>2.3 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p> <p>In relation to the recycling of materials, the Applicant has prepared an outline Waste Management Plan [EN010141/DR/7.12] which sets out a strategy for managing waste across the lifetime of the Scheme.</p> <p>Similarly, the Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be protected and managed during construction and operation.</p>
		Consultation materials	<p>PIER Vol3 Figures 2-1b to 2-1g ‘Work No. 8 – works to create, enhance and maintain green infrastructure’:</p> <p>a) BBC suggest that these Figures are indicative in terms of intent regarding landscaping works,</p>	N	<p>The Applicant can confirm that the figures published as part of the 2024 statutory consultation were indicative/illustrative, given that the design of the proposals had not been finalised at the time of the consultation.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			but that they remain open to discussion with the Host Authorities;		
		Landscape buffers	<p>PIER Vol3 Figures 2-1b to 2-1g 'Work No. 8 – works to create, enhance and maintain green infrastructure':</p> <p>b) While the Promotor has introduced landscape buffers/ corridors to boundary areas it is unclear if these are of sufficient width to form meaningful screening to the development. As a minimum suggest eight-meter widths should be agreed and annotated on the Figures accordingly (It is noted in the body of the reports dimensions are mentioned, but Plan annotations would aid clarify);</p>	N	The Applicant notes this comment. The buffers to existing features such as hedgerows or watercourses are set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Landscape buffers	<p>PIER Vol3 Figures 2-1b to 2-1g 'Work No. 8 – works to create, enhance and maintain green infrastructure':</p> <p>c) BBC express concern that the retained landscape to the various river corridors appear either non-existent, or exceptionally narrow, and that these should be protected, say at a minimum of eight meters from watercourse centreline;</p>	N	The buffers to existing features such as hedgerows or watercourses are set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Landscape buffers	PIER Vol3 Figures 2-1b to 2-1g 'Work No. 8 – works to create, enhance and maintain green infrastructure':	N	The buffers to existing features such as hedgerows or watercourses are set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline

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			d) The Figures do not identify protected woodlands and hedgerows making it difficult to read if these too will be afforded a margin of landscape protection; and, as currently presented, BBC are not supportive of these Figures 2-1b to 2-1g. BBC are supportive of the Illustrative Environmental Masterplan (1of14) subject to the above clarification.		<p>Landscape and Ecological Management Plan [EN010141/DR/7.7].</p> <p>The Applicant has prepared ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] which assesses the potential impact of the Scheme on woodlands, trees, and hedgerows.</p> <p>Figures 2-1b to 2-1g of the PEIR presented initial drafts of the Works Plan which have been updated and submitted with the application for development consent (see Works Plan [EN010141/DR/2.3].</p>
		Mitigation, landscape	<i>'An Outline Landscape and Ecological Management Plan (oLEMP) has been prepared which covers the Construction, Operational and Decommissioning Phases'</i> . In light of the potential significant works that may be required circa 20-years at the replacement of the solar arrays and BESS, it is suggested that when this occurs, the oLEMP is reviewed in terms of any harm occurring to the landscape/ habitat and that the Promotor is required to produce a mitigation and planting/ habitat strategy to address such harm; i.e. the LEMP should remain 'live' for the duration of the Development.	N	Section 8.0 of the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out the monitoring requirements for the plan, which will be reviewed across the lifetime of the Scheme.
		Mitigation, landscape, biodiversity	(Construction of East Park Sites A, B C and D (Months 2 to 30)): (m) <i>'Establishment of soft landscaping in areas of habitat mitigation'</i> . BBC	N	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets

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			are not supportive of this extensive period to undertake soft landscape and habitat works (with reference to the Promotor's Illustrative Environmental Masterplan). BBC would seek a Condition that the soft landscaping works are implemented within the first year of construction, to then enable a two-year establishment and replacement review with potential remediation strategy, prior to construction moving off site. Further, strong penalties should be put in place in any consent given, should the Promotor not instate the soft landscape and habitat works as then consented.		out how the landscape proposals will be implemented.
		Mitigation, biodiversity	(Vegetation clearance) For completeness it is assumed that woodlands, trees and/or hedgerows that are cleared will be replaced on a like-for-like basis and addressed within the Construction Environmental Management Plan (CEMP). Vegetation to be removed to facilitate access and/or visibility splays will be replaced on a similar basis to mitigate the long-term fragmentation of the countryside hedgerows currently framing fields and the public highway.	N	The Applicant does not expect to remove any trees or woodland to construct and operate the Scheme, as set out in ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] . Table 2-34 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] sets out the anticipated vegetation clearance required to construct the Scheme, and the timing for reinstatement. Any planting to be reinstated will be undertaken in accordance with the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Underground cabling,	Work No.1 (ground mounted solar photovoltaic generating station, inverters, solar transformers, switchgear), Work No. 2 – a Battery Energy	N	The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at decommissioning all solar modules, mounting

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		decommissioning	Storage System (including battery transformers, auxiliary transformers, control building), Work No. 3 – an on-site substation (East Park Substation), etc: it is unclear from these paragraphs how the cabling between individual components internal to the solar farm are addressed (refer to §2.4.11 which BBC suggests needs more clarification). Should any cabling be located underground, then it would be a requirement that these are all removed at the Decommissioning Phase.		poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be left in situ to reduce the environmental impact of excavation. This approach has been assessed in the ES [EN010141/DR/6.1] .
		Water supply, fire risk associated with BESS	[Firewater] <i>‘The NFCC guidance for BESS notes that consideration should be given within the site design to the management of water run-off such that in an emergency situation where polluted water may run-off from the facility this can be safely contained and treated, rather than risking pollution of groundwater or local watercourses’</i> . It is noted that the management and removal of contaminated firewater needs specific address in any Operational Environmental Management Plan including an emergency strategy should such firewater breach into river catchment areas and/or leach into ground water or soils.	N	<p>The Applicant has prepared an outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10] as part of the application that sets out how the BESS will be managed safely across the lifetime of the Scheme. The oBSMP has been informed by the NFCC guidance.</p> <p>ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline Surface Water Management Plan [EN010141/DR/7.13] set out how firewater would be contained within a drainage basin proposed adjacent to the BESS.</p> <p>To achieve this an impermeable surface would be required for the BESS, likely to be concrete or an impermeable membrane, such that any run-off can be directed towards a retention basin. In normal operation the retention basin would allow rainwater to pass through and</p>

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					drain to a nearby watercourse (as set out in outline Surface Water Management Plan [EN010141/DR/7.13]), but in an emergency situation a valve could be automatically engaged to isolate the retention basin and prevent any run-off for a period of time. This would allow the run-off to be collected and treated in an appropriate way.
		Construction, access, decommissioning	<i>'The internal roads to the BESS would be constructed of tarmac, concrete or similar to allow for heavier vehicles during construction and decommissioning, and safe access for fire services in emergency situations'</i> . It would be a requirement that all routes, hardstanding areas, §2.4.87/96-98 Cable Joining Chambers, §2.4.133 Retention Basin, Work No. 9 (access), and all concrete foundation/ works are removed at the Decommissioning Phase (to prevent long-term leaching, contamination, and in the interest of public safety regarding sunken chambers).	N	The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at decommissioning all solar modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time.
		Decommissioning	(and Table 2-26/27/28) <i>'The access tracks will be required to cross a number of watercourses...will be culverted'</i> . It is suggested that this matter is addressed as a detailed design matter and may require consent from the LLFA. The matter could be addressed by way of a pre-commencement Condition. It would be a requirement that all culverts are removed at the Decommissioning	Y	The Applicant has changed the design of the majority of the permanent crossings for the operational phase of the Scheme to be open span crossings, rather than culverts. Where culverts are proposed they would allow a natural substrate to form, ensuring continuation of the watercourse bed. The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at

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			Phase and the watercourse topography and vegetation reinstated.		decommissioning all solar modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. This would include watercourse crossings.
		Public Rights of Way	It is noted that some of these routes may be bridleways and consequently any temporary relocation should make provision for the access and safety of horse and horse-riders.	N	The Applicant notes this comment. The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be managed across the construction phase.
		Landscape and environmental management	<i>'Three FTE roles working in land management including landscape maintenance and agriculture'</i> . BBC note our support to the Promotor's commitment to appointing this workforce to manage the landscape and habitat for the duration of the Development but would like to see these roles set out specifically as part of both the CEMP and the Landscape and Ecological Management Plan.	N	The Applicant notes this comment. The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out that three FTE roles will be required to manage the landscape proposals as part of the Scheme.
		Construction	Table 2-35 (Indicative Operational Lifespan of Scheme Components): BBC are not supportive of this rather generic table as noted above in terms	N	The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on

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			of a possible Maintenance (Construction) Phase which should have some address in this Application and Outline Operational Environmental Management Plan (oOEMP).		<p>replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>
		Ecological Management Plan	<p>The Promotor has submitted the following outline management plans to guide Development. These, as a minimum, should form part of any consent given:</p> <p>a) Landscape and Ecological Management Plan (LEMP). This should include a Five-year replanting strategy (to address failure of first-planting) during both the Construction Phase and the Operational Phase – Replacement.</p> <p>b) Construction Environmental Management Plan (CEMP). It is suggested that this includes an approach to the operational replacement of solar arrays and the BESS facility during the lifetime of the proposed Development.</p> <p>c) Operational Environmental Management Plan (OEMP)</p> <p>d) Decommissioning Environmental Management Plan (DEMP)</p>	N	<p>The Applicant has prepared the following management plans as part of the application for development consent, each of which would be developed into a final plan prior to the relevant phase of the project:</p> <ul style="list-style-type: none"> • outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]; • outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]; • outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]; • outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6];

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>e) Construction Transport Management Plan (CTMP)</p> <p>The Host Authority notes that, as this is a cross-boundary Application, the Promotor may wish to give some consideration as to how these management plans are discharged.</p>		<ul style="list-style-type: none"> • outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]; • outline Public Rights of Way Management Plan (oPROWMP) [EN010141/DR/7.8]; • outline Soil Management Plan (oSMP) [EN010141/DR/7.9]; • outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10]; • outline Skills, Supply Chain and Employment Plan (oSSEMP) [EN010141/DR/7.11]; • outline Waste Management Plan (oWMP) [EN010141/DR/7.12]; • outline Surface Water Management Plan (oSWMP) [EN010141/DR/7.13]; and • outline Archaeological Mitigation Strategy (oAMS) [EN010141/DR/7.15].
		Decommissioning	<p><i>'The effects of decommissioning are often similar to, or to a lesser magnitude than, the construction effects and will be considered where possible in the relevant sections of the ES. However, there can be a high degree of uncertainty regarding decommissioning as engineering approaches and technologies evolve over the operational life of the Development'</i>. BBC would suggest that this is a</p>	N	<p>The overarching methodology for the environmental impact assessment is set out in ES Vol 1 Chapter 4: EIA Methodology [EN010141/DR/6.1], with topic-specific methodologies provided in each assessment chapter of the ES.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			rather open-ended statement, and that the Promotor should carry such known and unknown risk for, as a minimum, for the duration of the Development and that this matter should be reflected in any Operational Environmental Management Plan.		
		Construction, Environmental Masterplan, landscape	<p>PEIR CHAPTER 3: ALTERNATIVES AND DESIGN EVOLUTION</p> <p><i>‘...the construction corridor for the grid connection is expected to be up to 25m wide’.</i> For clarity, this dimension should be denoted on the Illustrative Environmental Masterplan(s) to understand potential harm (width) to the existing landscape along this corridor.</p>	N	The Order Limits for the Scheme are shown on the Works Plan [EN010141/DR/2.3] , with a description of the works set out in ES Vol 2 Chapter 2: The Scheme [EN010141/DR/6.1] . All drawings submitted with the application are drawn to a scale and include a scale bar.
		Operational phase, panel replacement	<p>PEIR CHAPTER 4: EIA METHODOLOGY</p> <p>(Operational Phase) <i>‘The effects of the Scheme once operational will be restricted to its operation, use, and maintenance of the equipment and landscaping’.</i> A central approach to the PEIR and all supporting material, is the Promotor’s broad assumption that the Operational Phase will be benign (i.e. limited to landscape and infrastructure maintenance). In reality this Phase may include the total replacement of all solar arrays and BESS batteries when they fall below operational efficiencies, and that this replacement will generate considerable construction activity in say 20-years, commiserate with the construction</p>	N	<p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			activity created at inception. Further, this construction activity may require the cut-back/ removal of existing and instated landscaping to facilitate access. Consequently, this replacement within the Operational Phase needs to be addressed within the Environmental Statement. Currently this matter is not addressed.		
		Design objectives	In principle, BBC are supportive of the seven Design Objectives set out. However, the Promotor offers no methodology regarding an assessment when there are conflicting demands and effects as to how the Design Objectives will then be weighted up.	N	The Applicant notes this comment. The Design Principles (formerly design objectives) are described in the Design Approach Document [EN010141/DR/5.6] and secured by the Design Parameters and Principles Statement [EN010141/DR/7.1] . The final Scheme design will have regard to the design principles.
		Cultural heritage and archaeology, mitigation	<p>PEIR CHAPTER 6: CULTURAL HERITAGE AND ARCHAEOLOGY</p> <p>The PEIR identifies three potential mitigation options in §6.9.4 comprising ‘no dig’ construction, preservation by record (excavation), and revisions to the design and layout of the Development to avoid impacts. In theory these are potentially acceptable options, however they will need to be informed by the completed evaluation results. BBC have some concerns over ‘no dig’ solutions as in many instances these still require a reasonable amount of excavation i.e. for cabling, transformers, inverters and other associated infrastructure. BBC also note that while §6.9.4</p>	N	<p>The interim archaeological trial trenching reports for the fieldwork are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>This updated information has been used to inform the mitigation strategy (inclusive of areas of no impact and no dig solutions) related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of this chapter.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			sets out these three approaches to mitigation the 'preferred' option appears to be 'no dig' construction using concrete feet for the panels as set out in the final design principle in §2.4.12 and again in §6.7.8 as well as elsewhere in the PEIR. The 'no dig' option may not be appropriate in all archaeological areas. The detailed mitigation strategy based upon the results of the archaeological evaluation should be agreed with the relevant Host Authority in advance of the DCO.		The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.
		Cultural heritage and archaeology, mitigation, construction, archaeological assessments	BBC would like to see far more detail than that which has been provided to date in Chapter 6 of the PEIR or the outline Decommissioning Environmental Management Plan (DEMP), further assessment of the potential impacts on archaeological remains at this stage should be provided together with an appropriate methodology designed so as to minimise these impacts. Proceeding on the basis of 'assumptions' is not acceptable.	N	An assessment of the impacts of the Scheme during the decommissioning phase is provided in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] . The approach to mitigating archaeological impacts at each stage of the project are set out in the oAMS [EN010141/DR/7.15] .
		Cultural heritage and archaeology, mitigation, construction, archaeological assessments	BBC have concern that areas of archaeological significance will be 'identified post determination' this suggests an intention to undertake evaluation along the Grid Connection after determination of the DCO, this should be completed ahead of the any submission made so that appropriate detailed mitigation measures in this area can be agreed as part of the DCO process.	N	The Applicant has undertaken geophysical survey along the grid connection, as reported in ES Vol 2 Appendix 6-5 [EN010141/DR/6.2] . The approach to mitigating archaeological impacts at each stage of the project are set out in the oAMS [EN010141/DR/7.15] .

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		Cultural heritage and archaeology, mitigation, construction, archaeological assessments	<p>BBC have concerns with the first bullet point that notes completion of the geophysical survey 'so far as possible' and the second bullet point that notes completion of the archaeological trial trenching 'so far as possible'. BBC expect this work to be completed prior to submission and further to this additional trial trenching is likely to be required in the cable corridors and grid connection.</p> <p>Given the lifespan of the proposed Development, BBC expect the archaeological mitigation strategy or the individual site WSIs to include ongoing management proposals so that areas where archaeological remains have been preserved are recognised in the event of maintenance requiring additional groundworks being identified during the Operational Phase. Provision should be made for these works to be mitigated if necessary.</p>	N	<p>The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.</p>
		Cultural heritage and archaeology, mitigation, construction, archaeological assessments	<p>The illustrative masterplan (PEIR Figure 2-2) shows the indicative locations of centralised inverters and transformers as well as proposed construction compounds - are these locations flexible so that they can be moved to avoid areas of significant archaeology? BBC note the plan is illustrative and would not expect it to be finalised until the completion of the archaeological evaluation.</p>	N	<p>The locations of centralised inverters and transformers are flexible within the design parameters being applied for, and will be sited to avoid Areas of Archaeological Sensitivity.</p> <p>The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>This updated information has been used to inform the assessments of potential and design and the mitigation strategy related to</p>

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					<p>the potential for direct and indirect impacts on potential archaeological remains as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of this chapter.</p> <p>The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.</p>
		Heritage assets	<p>The Church of All Saints, Little Staughton (Grade I) is located on a ridge overlooking the wider landscape to the northwest, north and northeast – Pevsner describes it as a “dramatic picture” from this perspective. Due to its four-stage 15th century tower with 19th century spire (rebuilt 1910) and its prominent, exposed location, the church’s setting is extensive and it is clear that the church was originally designed to dominate the local landscape. As noted in the DBA, this includes the proposal Site where there would be ‘clear intervisibility’ not only from within the churchyard and immediate setting of the church (see PEIR Figures 5-55, 5-56 and 5-57), but also in a number of medium and long distance views to the north looking back towards the church; some of which include clear views of the nave and chancel as well as the tower (so that one is able to fully appreciate its significance). The Site’s rural character makes a strong contribution to the way in which the asset is experienced and understood – it reflects its original agricultural setting and its historic ties to the wider landscape. Views from within and around the site including from</p>	N	<p>ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a detailed desk-based assessment and settings assessment which describe the historic development and archaeological resource of the area. This work identifies heritage assets within the villages, including designated assets such as the Grade I listed Church of All Saints in Little Staughton, the Grade I listed Church of St Peter in Pertenhall, and a range of Grade II listed farmhouses, cottages and associated structures.</p> <p>The ES also records the archaeological and historic landscape context of both settlements, including evidence of medieval and post-medieval settlement shrinkage, ridge and furrow, moated sites, and historic routeways which are integral to the character of the villages. These have been assessed both for potential direct impacts and for effects on their settings.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>Staughton Road, footpaths 1 and 19 take in the immediate fields to the south of the church, including blocks of ridge and furrow. Peripheral in such views is the village (identified by mature planting and rooftops) as well as St Peter's Church in Pertenhall to the west. Such views provide evidence of a historic, rural landscape and All Saints Church's place within it. The effect of placing large swathes of solar panels orientated southwards within the Site would be to erode the rural character of the landscape and introduce conspicuous and incongruous development in its place that would be highly visible given the change in levels. It would also take away from one's experience to the north where the relationship between the Church, Little Staughton and the wider landscape would be disrupted. The DBA suggests the Development would not affect the Church's prominence within the landscape, but from different perspectives the panels would draw undue attention away from the Church and its landmark value. Elements of its rural setting would be retained including immediate fields to the north and northeast, and there would be no direct impact on the fabric of the listed building. However, given the strong contribution setting makes to significance, of which the site forms a significant element, the Operational Phase would likely result in a moderate level of less than substantial harm to the significance of the Church, subject to full details. This would constitute a</p>		

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			'moderate significant effect' in EIA terms based on Table 11.6 of the Scoping Report.		
		Heritage assets	<p>The Setting Assessment Table identifies a number of circumstances in which an asset of low 'relative sensitivity' and a low 'magnitude of impact' would occur, a 'neutral impact' from the Operational Phase would arise. BBC appreciate that the assessment takes into account a large number of assets and the methodology attempts to provide a proportionate approach to assessing the likely impact of the development (and whether such impacts would result in 'significant effects' in EIA terms). 'Relative Sensitivity' was defined in §11.6.10 of the Scoping Report as an asset's <i>'capacity to retain its ability to contribute to our understanding and appreciation of the past in the face of changes to its setting'</i>. In a number of cases, especially relating to Grade II listed farmhouses and agricultural buildings, BBC are of the view that the relative sensitivity is likely to be higher than the 'low' level typically attributed in the Table where their rural setting has been largely retained. This is because such assets tend to draw strongly upon the rural landscape as part of their significance, and as such are likely to warrant a 'medium' or 'high' relative sensitivity. A low magnitude of impact in that instance is likely to translate to a low or minor level of less than substantial harm. Whilst not likely to be a 'significant effect' in EIA terms, such effects still need to be identified and the harm weighed</p>	N	<p>The updated assessment of the potential for impacts on the setting of designated heritage assets is presented within Table 1 and Section 3 of ES Vol 2 Appendix 6-4 [EN010141/DR/6.2] and in Section 6.8 of this chapter.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			accordingly against the public benefits flowing from the development as per §5.9.32 of EN-1.		
		Glint and glare	Glint and glare – this does not seem to be considered as a potential impact on heritage assets. For example, there are no ‘glint and glare’ receptors located within the churchyard at All Saints, Little Staughton, including from one apparent designed view from north of the church (where vegetation has been cleared in line with a bench). It is suggested that this should be considered in Appendix 5-6.	N	Specific assessment of the potential effects of ‘Glint and Glare’ have been incorporated in to the assessment presented within ES Vol 2 Appendix 5-6 [EN010141/DR/6.2] , as well as Table 1 and Section 3 of ES Vol 2 Appendix 6-4 [EN010141/DR/6.2] .
		Mitigation, heritage assets	There is no real discussion relating to potential mitigation measures. The aim of any Development of this nature should be to identify adverse effects on heritage assets and seek to mitigate them as far as possible (particularly when ‘significant effects’ are identified). Whilst it is accepted that this currently appears to be a matter of disagreement between the Promotor and BBC, there are likely to be ways of mitigating the impact on All Saints Church further by through sensitive changes to the design and layout. If this is not possible – i.e. the amount of mitigation required would fundamentally compromise the aims of the Development, then this should be spelled out in the PIER in order to justify the harm caused to the asset.	N	ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a detailed desk-based assessment and settings assessment which describe the historic development and archaeological resource of the area. This work identifies heritage assets within the villages, including designated assets such as the Grade I listed Church of All Saints in Little Staughton, the Grade I listed Church of St Peter in Pertenhall, and a range of Grade II listed farmhouses, cottages and associated structures. The ES also records the archaeological and historic landscape context of both settlements, including evidence of medieval and post-medieval settlement shrinkage, ridge and furrow, moated sites, and historic routeways which are integral to the character of the

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					villages. These have been assessed both for potential direct impacts and for effects on their settings.
		Mitigation, heritage assets	BBC disagree with the findings of the PEIR in relation to the impact on All Saints Church, and whether or not a 'significant impact' is likely to arise. BBC would wish to see the ES explore potential ways of mitigating this impact. BBC note that the Settings Assessment Table has been provided without context and should be supported with the preamble provided in the Scoping Report. Though the table and the chosen methodology is effective in terms of identifying significant effects, there is concern that in a number of cases a degree of less than substantial harm may arise to a number of listed buildings where a neutral impact has been recorded.	N	<p>The Applicant has assessed the impacts to the All Saints Church within ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>Further supporting evidence as to how the design process has avoided or mitigated for impacts on the church is set out under design principle 2.1 in the Design Approach Document [EN010141/DR/5.6].</p>
		Hedgerows, habitats, mitigation	<p>PEIR CHAPTER 7: ECOLOGY AND NATURAL CONSERVATION</p> <p><i>'Hedgerow habitats will be almost entirely retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening required to permit Site access at ten locations and totalling 54m with no individual length of removal greater than 6m. Post-construction, seven crossing points, totalling 37m, will be reinstated. Implementation of the landscape design is discussed in relation to operational impacts'.</i> This matter should be read</p>	N	<p>The Applicant has prepared ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] which sets out where hedgerow removal will be required, and the root protection areas for trees and hedgerows.</p> <p>Visibility splays are shown as part of the supporting figures to ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>against the Highway Officer's comments regarding visibility splays at access points; and concern stated elsewhere regarding the construction of temporary access routes and cable corridor widths across the Site and their effect on existing hedgerows and their related habitats. It is suggested that the harm/ effect could be larger than originally stated. If this is the case, then any mitigation measures would need to be re-visited. Consequently, the statements in §7.8.8, §7.8.9 etal 'Minor hedgerow removal' may need review and are currently not supported.</p> <p>To ensure nearby trees and hedgerows are protected during construction, there should be conditions imposed requiring the installation of protective measures and that working methods are undertaken in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction.</p>		
		Hydrology, drainage, flood risk	<p>PEIR CHAPTER 8: HYDROLOGY AND FLOOD RISK</p> <p>It is proposed that appropriate measures will be remediated and retained during the Operational Phase which is supported by the LLFA and the Host Authority look forward to more details being provided. However, these aspects mainly focus on the access tracks and Battery Energy Storage System (BESS) areas. Rainfall upon solar arrays are generally shed between rows and allowed to run onto the ground. This concentration of water</p>	N	<p>Further consultation with CCC lead to agreement that solar panels should not lead to channelisation assuming that vegetation is established and well maintained, particularly during the first 5 years of operation.</p> <p>The maintenance regime of the grassland under panels has been described in detail within the outline Surface Water Management Plan [EN010141/DR/7.13] and outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			flow can create channelised flows which can erode the soil and allow a greater volume to enter watercourses or flow to adjacent areas at a greater rate than would otherwise occur in greenfield conditions. Therefore, further consideration should be given to drainage of the solar array areas - particularly during the establishment of vegetation. This may include the inclusion of filter drains between solar arrays or swales at the lowest points of the site to prevent channelling of water and promote infiltration.		
		Hydrology, drainage	Rows of solar arrays lead to rainfall shed to the ground between the rows and depending upon infiltration rates can lead to additional runoff to adjacent watercourses, especially as gradients increase. This can exceed Greenfield runoff rates. Detailed information is required to demonstrate how this additional runoff will be managed for the solar array areas via swales, filter drains etc. This is particularly important prior to vegetation becoming fully established.	N	The maintenance regime of the grassland under panels has been described in detail within the outline Surface Water Management Plan [EN010141/DR/7.13] and outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Hydrology, drainage	The Promotor should ensure that all existing watercourses are maintained and remediated throughout each phase of the Development. All obstructions to watercourses should be removed during and after construction. Maintenance proposals are required for SuDS proposals and existing watercourses during and post construction.	N	The outline Surface Water Management Plan [EN010141/DR/7.13] includes a maintenance plan for all SuDS feature types employed in the scheme.

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		Access, traffic, transport	<p>PEIR CHAPTER 9: TRAFFIC AND TRANSPORT</p> <p>Access SA16:</p> <p>a) Given the amount of access movements, consideration should be given to the signalisation of this main access through peak hours of operation which may require a temporary traffic regulation order to reduce the speed limit locally, on the approaches to the signals.</p> <p>b) Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used.</p> <p>c) The access future use, after construction: will the accesses be returned to verge / closed or continued to be used through the operational phase for maintenance purposes; and, if so at what frequency.</p> <p>d) Any alteration or piping of ditches and/or culverts to provide or improvements to existing accesses will require LLFA approval.</p> <p>e) After comparison with highway boundary records, the visibility splays shown appear to fall outside the highway extent. This contradicts the statement at §2.4.154 and 2.4.155. There may be features present on the ground, which are not captured on mapping, that alter the assumed location of the highway boundary. For example not all ditches are shown on Ordnance Survey mapping, but these are generally considered not to form part of the highway. Therefore any</p>	N	<p>It is noted that a small portion of the required visibility to the north-west at this access falls outside of the adopted highway boundary. However, the required visibility splays are achievable within the public highway or in land under the Applicant's control, with no recourse for third-party land. it will be a provision of the DCO that existing features will be managed to maintain visibility, and no obstructions would be erected within the visibility splays.</p> <p>A swept path analysis of the proposed access junction has been undertaken as part of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p> <p>Consideration of traffic management measures is included within the outline Construction Traffic Management Plan [EN010141/DR/7.4].</p>

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			proposed visibility splay will need to be considerate of on-the-ground features and not simply modelled from a map. Acquisition of additional land may be required to ensure visibility splays can be delivered as part of the highway. Detailed highway boundary information can be requested from the relevant Host Authority's Highways Records Team but may also require consultation with the Archaeology Officer regarding removal of non-designated hedgerows.		
		Access, traffic, transport	<p>Accesses SA14 and SA15:</p> <p>a) Observed vehicle speeds are indicated at 41.4 mph 85%ile speeds. As this is above the MfS threshold of 37mph this would require to be derived from DMRB not MfS criterion. Correct splays need to be 109m not the indicated 69m. Promotor to amend plans of the visibility splays in these locations and supply locations of speed surveys and data.</p> <p>b) The visibility splay shown for Access SA14 appears to extend outside of the highway. It is shown cutting into a hedgerow. Hedgerows are not considered to form part of the highway and would typically be a boundary feature.</p> <p>There is evidence to suggest the hedgerows in this location is not the boundary, as it is situated at the rear of a ditch that runs along Moor Road. The highway only extends to the top of the carriageway-side slope into the ditch and</p>	N	<p>The site accesses will be situated within a section of Moor Road featuring several sharp bends. As such, it is likely that vehicle speeds in the vicinity of the accesses will be significantly lower than the observed speeds used in the visibility calculations.</p> <p>Accesses SA14 and SA15 would also only be used during the construction and decommissioning phases. Use of these accesses would therefore be relatively infrequent. It is therefore considered that interpolating from MfS visibility distances in this case is appropriate. The required visibility splays are achievable within the public highway or in land under the Applicant's control, with no recourse for third-party land.</p> <p>Consideration of traffic management measures to control vehicle speeds in the vicinity of these accesses is included within</p>

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			therefore the proposed visibility line extends outside the highway.		the outline Construction Traffic Management Plan [EN010141/DR/7.4] .
		Access, traffic, transport	<p>Access SA13:</p> <p>a) Access is indicated within document PIER Fig 2-5 'Proposed site access', however there are no details of traffic movements associated with this access. Movements along Moore Road for construction as indicated previously, it is not of nature suitable to carry construction vehicles without mitigation. Details of any traffic movements associated with this access should be provided during and after construction.</p> <p>b) Visibility splays do not appear to have been supplied for this access point. Proposals for this access point to be clarified. Promotor to note that there are physical features in this location that might cause the legal extent of the highway to be questioned.</p> <p>Following the inclusion of access SA12 as a construction route into and from sites A and B, it requires the use of both Great Staughton Road from the Zantra access to the West and Spring Hill Road. Details of the visibility splays at the junction of Spring Hill Road should be provided and the details of the geometry of this junction along with tracking to ensure it is suitable for two-way simultaneous movements of the largest vehicles likely to use this junction. Tracking should also be supplied from the Zantra access (SA12) to the accesses SA10 and SA11 on Spring Hill for</p>	N	<p>Visibility splays for this access have been considered within ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p> <p>This access would only be used during the operational phase. Access would be generally by maintenance staff in a large van or 4x4, and would be relatively infrequent, commensurate with the existing use of the access by agricultural traffic. The requirement for HGVs to travel along Moor Road to this access would be highly infrequent.</p> <p>It is acknowledged that the use of an internal haul route connecting directly to access SA11 could be preferable in some regards to routing construction traffic via Great Staughton Road via access SA12. However, the Applicant does not have land rights to create an internal haul route that avoids use of access SA12, and has demonstrated that the use of access SA12 is suitable without unacceptable adverse highway impacts. Access SA12 has therefore remained part of the proposed access strategy for the DCO submission.</p> <p>A swept path analysis of the proposed access junction has been undertaken as part of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p>

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			<p>largest vehicles likely to use this road simultaneously to ensure it is suitable.</p> <p>Similar to Moor Road, the Promotor should be invited to clarify why it is necessary to use this element of public highway (Great Staughton Road/Spring Hill?) when the access to SA11 could be routed similarly internally removing any issues with construction and staff vehicles using the public highway? It is noted that the access track/ cable route adjoins site C, South of the Zantra access. CCC can see no benefit in using the public highway when a further access track adjacent the route of the cable would remove many issues.</p>		
		Access, traffic, transport	<p>Accesses SA10 & SA11:</p> <p>a) Northern Junction splays indicated at 2.4m x 103m based on 39.9mph recorded speeds which is acceptable. Promotor to supply speed data and location of survey.</p> <p>b) Southern junction splays indicate 2.4m x 119m based on 43.6mph 85%ile recorded speeds which is acceptable. Promotor to supply speed data and location of survey.</p>	N	Visibility splays have been assessed against adopted highway boundary data. The required visibility splays are achievable within the public highway or in land under the Applicant's control, with no recourse for third-party land
		Staff vehicle movements	In addition to the HGV movements the Promotor is suggesting an additional 854 staff visiting the site per day. The Promotor has assumed staff would car share and is stating a worst-case scenario of 854 two-way staff movements per day.	N	The outline CTMP [EN010141/DR/7.4] document has been submitted outlining the measures proposed to mitigate the transport impacts. A requirement of the draft DCO [EN010141/DR/3.1] secures that these

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			Again, these assumptions have not been backed up by any evidence or data. If there are 854 staff and all drive, then there will be 1,708 two-way vehicle movements per day. Whilst this is unlikely, no justification has been provided on how many staff will car share.		measures are developed in detail and complied with.
		Staff vehicle movements	It is noted that there appears to be limited information regarding staff travel (Travel Plan) other than a broad assumption that some people would car-share to Site, and that minibuses between sites may be provided. BBC suggest that this is insufficient information. Further, it is noted that the various sites may be under construction over a similar period and this would suggest that there may be on-site, off-site travel, and construction movement between the sites which appears not to have been addressed by the Promotor.	N	Given the rural location it is acknowledged that there are limitations on staff travelling to the Order limits by walking, cycling and public transport. The outline CTMP [EN010141/DR/7.4] document has been submitted outlining the measures proposed to mitigate the transport impacts. A requirement of the draft DCO [EN010141/DR/3.1] secures that these measures are developed in detail and complied with. ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/APP/6.2] provides details of the assessment.
		Staff vehicle movements	BBC's Highways would require more clarity from the Promotor against collective highway's matters raised prior to been in a position to support the PEIR and any future Application at this stage.	N	The Applicant notes this comment.
		Noise and Vibration	PEIR CHAPTER 10: NOISE AND VIBRATION The Promotor notes that tonality correction should not be applied in terms of tonality from	N	The expert opinion in terms of noise character for the Site plant operation is provided in paragraph 10.8.30. The current technology indicates tonal noise character is not an issue

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			<p>transformers or fan assisted cooling systems, given the separation distance to noise sensitive receptor (NSR). It states that predicted noise levels which are relatively low at NSR and the existing residual sound levels at NSR being much higher (to provide effective masking) any tonal noise is not predicted to be perceptible at the NSR and therefore a tonal character penalty would not be required.</p> <p>BBC do not consider that sufficient justification has been given noting that a tonal sound may be audible if distinctive from the existing residual sound and what components of sound form that residual sound environment. BBC assume form locality that distance road traffic may be present as well as biophonic environmental sound, e.g. birdsong. However, plant noise which will be electrical in nature may emit prominent low frequency sound resulting in a distinctive hum and so is in contrast to the residual sound environment.</p>		<p>from solar and BESS inverter, transformer and battery storage plant.</p> <p>The peak LFN from HV transformers is addressed in paragraphs 10.8.56 to 10.8.58 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] and ES Vol 2 Appendix 10-5 [EN010141/DR/6.2].</p> <p>Sample 1/3 octave band centre frequency spectra from BESS, Solar and HV Transformer are provided in ES Vol 2 Appendix 10-5 [EN010141/DR/6.2] which show no significant tonal character.</p> <p>As advised above in terms of LFN this has been assessed based on the 'worst case' NSR and result show no exceedance of guidance.</p> <p>Additionally, the EPO agreed noise limits at paragraph 10.6.15 includes the 'rating' level as part of the limits, which means that any perceptible noise character at NSR, including tonality, would be included as part of any Site noise assessment and as such provides protection against its existence relative to the representative background sound level.</p>
		Noise and Vibration	<p>Similarly, BBC would query whether equipment would have potential to emit any pulsing sound and further subjective description around plant and equipment would be advantageous in supporting the conclusion that adverse impact from this development would be unlikely.</p>	N	<p>In terms of pulsing sound, the type of plant that generates noise from the solar & BESS plant is not a character that presents itself under witness load tests. The battery storage & battery/solar inverter plant is experienced as a relatively steady state noise source. The</p>

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					author's experience over the last 10-15 years dealing with Solar & BESS shows that the technology is rapidly changing and through research and development noise levels are reducing and mitigation measures improved to control noise character.
		Noise and Vibration	BBC would advise that if the site is likely to be associated with emission of low frequency sound which is outside the scope of BS 4142, then additional assessment for low frequency noise (LFN) needs to be considered and scoped out if not relevant.	N	<p>The peak LFN from HV transformers is addressed in paragraphs 10.8.56 to 10.8.58 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] and ES Vol 2 Appendix 10-5 [EN010141/DR/6.2].</p> <p>As advised above in terms of LFN this has been assessed based on the 'worst case' NSR and results show no exceedance of guidance.</p>
		Air quality, fire risk from BESS, water contamination	Notwithstanding the comment made by the Promotor regarding 'very low potential for significant environmental effect on air quality to occur in the operational phase' it is specifically noted that, while BESS fires are rare, should they occur they can have a significant effect on the public health of the surrounding community in terms of release of toxic fumes into the air for a prolonged period of time; and, that if contaminated firewater is not managed on-site this could affect receiving water courses and groundwater to the long-term detriment of the environmental. It is therefore noted that this low probability/ significant	N	<p>The Applicant has prepared an air quality assessment of unplanned emissions from an accidental Battery Energy Storage System (BESS) fire during the operation and maintenance of the Scheme. This is provided as Appendix A to the outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10].</p> <p>The assessment has been undertaken using an atmospheric dispersion model to determine the determine the likely effects on human health from a potential BESS fire. The assessment concludes that based on the</p>

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			effect should be addressed in the Promotor's submission.		<p>factors of distance to the nearest locations of human exposure and the anticipated short-term nature of a fire incident, there would be no significant air quality effects as a result of a BESS fire incident.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire. The BESS scheme will integrate an external firefighting water capture drainage system. In the event of a fire a system of automatically self-actuating valves at the outfalls from the BESS areas will be closed, isolating the BESS areas drainage from the wider environment. Fire water runoff may contain particles from a fire; the runoff must be contained and tested before being allowed to discharge to the local watercourses. The water contained by the valves will be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site (if polluted) or releasing into drainage systems, if safe to do so.</p>

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		Decommissioning, waste	<p>PEIR CHAPTER 16: OTHER ENVIRONMENTAL TOPICS</p> <p><i>'PV panels would be dismantled and the panels separated into their component parts to allow the constituent elements to be recycled. At the point of decommissioning, all of the panels would be removed to a PV panel recycling facility. The resource value of the various components of the panels, along with the legislative requirements of the waste management regime, mean that the vast majority of the PV infrastructure would be recycled'.</i> Further to that raise elsewhere in this response relating to replacement of PV panels and batteries during the Operational Phase, this strategy needs more clarity/ conviction. Currently, a potential significant contribution to the waste of this Development is too generically worded.</p>	Y	<p>The Applicant has provided an updated assessment of potential waste impacts in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>Waste will be managed in accordance with the outline Waste Management Plan [EN010141/DR/7.12], as well as the outline Construction Environmental Management Plan [EN010141/DR/7.3], outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p> <p>The Applicant notes the decision by the Secretary of State in determining the East Yorkshire Solar Farm DCO (<i>ExA report ref 3.13.50 and 3.13.51</i>) that although the capacity of facilities to handle decommissioned solar PV panels is still developing, the recycling industry is likely to respond to demand over time.</p>
		Public Rights of Way	<p>There are two Definitive Map Modification Order (DMMO) applications within the Cambridgeshire section of the proposed Development. Without prejudicing the outcome of these applications, the Host Authority would request that permissive rights for equestrians and cyclists are provided along those routes until either the lifespan of the Development ends, or in the case of the DMMO application being upheld, public bridleway(s) are</p>	N	<p>The Applicant is aware of one DMMO application that intersects the Site (Case Number M206 - LH) to create a bridleway. The Applicant has not provided a permissive path along this route at this stage, as any such path would terminate at the southern end of the Site without providing any onward route. The Applicant is open to the creation of a public right of way along this route, and to potential</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			confirmed along the routes. This would provide improved east-west off-road connectivity for non-motorised users, which would support the aims of the Cambridgeshire County Council Rights of Way Improvement Plan.		future permissive path provision in this location.
		Public Rights of Way	There is an opportunity to provide a new circular permissive bridleway around the edge of the proposed grassland area on the Northeastern side of Site D, which would extend the options of circular routes available to the benefit of Great Staughton residents.	N	The Applicant notes this comment. A bridleway has not been included around the northern edge of Site D at this time, however a permissive path for the duration of the Scheme could be provided at a later date.
		Public Rights of Way	The Host Authority has a statutory duty in respect of PRow and will ensure that members of the public are not inconvenienced in their use of PRow. Therefore, where works are required within/ across PRow, for example where construction access or cable routes utilise or cross PRow, then prior notice to the commencement of Development, a condition survey shall be submitted to and approved by the relevant Host Authority. During the Construction Phase, and possibly the Operational Phase – Replacement, temporary closures will be required for each route that is affected.	Y	The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application that sets out the approach to be taken for each public right of way that intersects the Order Limits.
		Public Rights of Way	Details of reinstatement, enhancement, new routes to PRow, not limited the restoration of paths to an acceptable condition and including	Y	The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application

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			hedgerow planting if applicable, must be approved by the relevant local planning authority. Details should be provided regarding the proposed permissive paths which should be multiuse routes suitable for walkers, cyclists and equestrians. Routes should improve connectivity and provide recreational enhancement for users.		<p>that sets out the approach to be taken for each public right of way that intersects the Order Limits.</p> <p>Detail of the surfacing of the permissive paths is provided in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p> <p>The permissive paths are proposed for pedestrian users only, as the routes proposed would not link existing bridleways or roads.</p>
		Cumulative impacts	<p>PEIR CHAPTER 17: CUMULATIVE EFFECTS</p> <p>The Host Authority supports the long and short list of 'Other Development', and Figure 17.1 Long List of Cumulative Schemes. BBC are broadly supportive of this list but suggest that this should include Major Development sites in current discussion that may come forward during the DCO process. Of immediate address is:</p> <p>a) EN010170 Green Hill Solar Farm: consists of an electricity generating station with a capacity of up to 500 megawatts (MW) comprising of ground mounted solar arrays and associated development including energy storage, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance of the scheme. The sites and cable route search area are situated in an area of countryside within the administrative boundaries of North Northamptonshire, West</p>	N	<p>The Applicant has reviewed and updated the list of cumulative schemes that are assessed as part of ES Vol 1 Chapter 17 [EN010141/DR/6.1].</p> <p>The Applicant has not assessed cumulative effects with Green Hill Solar Farm as it is approximately 16km west of the Site and therefore beyond the area of search used for the ES. The Applicant has considered the two schemes and due to the distance between them, and that they are using different sections of the highway network, there is no potential for likely significant cumulative effects.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>Northamptonshire and Milton Keynes Councils, located between the towns of Northampton, Wellingborough and Bedford. The sites cover an area of approximately 1,194.8 hectares (ha) excluding the cable route search area and cable corridor(s).</p> <p>b) (Table 17.5) Tier 3 sites with specific regard to BBC's emerging Local Plan.</p> <p>c) It is noted that there are a number of consented and proposed solar developments in the area, as well as a battery energy storage system with permission next to the Eaton Socon Substation. Therefore the impacts associated with such infrastructure need to be considered in terms of cumulative effect.</p>		

Table 1.4: Bedford Borough Council – Local Access Forum

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Public Rights of Way, access	We acknowledge that your consultation states that all public rights of way will be preserved for public use. However, during the construction phase, even if no formal closures of rights of way are proposed, there will be a significant adverse impact on users of the rights of way. Many users will be inclined to avoid using these routes because of the noise and vibration involved – meaning that these routes will only be available for evening, Saturday afternoon and Sunday use. You should aim to seek to minimise the impact on public path users as much as possible.	N	The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application that sets out the approach to be taken for each public right of way that intersects the Order Limits.
		Public Rights of Way, access	It had been stated that the only impact on public rights of way during construction would be where it is necessary for them to be crossed by cable corridors and that this will be managed to minimise disruption. This does not appear to be true for the consultation plan in that Bolnhurst and Keysoe ("B&K") Bridleway 37 (which runs from Green End Pertenhall up to the end of the most westerly array) is to be used as the access route to Site A. Further it seems that Little Staughton Footpath 8 is also to be used as an access track. This is not acceptable and alternative access arrangements should be made to avoid any	N	A 900m section of the Bolnhurst and Keysoe 37 bridleway would be used as a construction access road, with construction vehicles required to travel along the PRoW. As such, it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic. The route of the PRoW runs through open fields. As such, it is proposed that PRoW users would be protected through the provision of a temporary PRoW diversion. This would run through the field immediately adjacent to the north of the existing alignment of the PRoW. Temporary fencing would be provided to

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			use of the rights of way by construction traffic, perhaps by using parallel access tracks as is the case in most of Site B. It should certainly be possible to minimise such construction access use on B&K BW37 by accessing the most westerly arrays via the more northerly ones. Use of the rights of way for normal operational maintenance would be acceptable.		segregate PRow users from construction traffic. The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application that sets out the approach to be taken for each public right of way that intersects the Order Limits.
		Green lanes	We had advised that care should be taken not to create narrow corridors and we are pleased to note that all rights of way that cross the site are to be within 20m wide 'green lanes'. This is not entirely true of B&K BW 37 but that will be open to one side for most of its length.	N	The Applicant notes this comment.
		Green lanes	Please note that within the rights of way world 'green lanes' has a specific meaning that relates to routes that can used by 4x4s whose drivers enjoy 'green laning'. This is not encouraged on public rights of way within Bedfordshire where the clay soils are prone to significant damage by such activity. Some 6km of byways open to all traffic have been closed since July 23 due to such damage, plus seasonal closures on most of the others. I understand that this is not your intention but perhaps you would change the terminology, maybe to green corridors?	N	The Applicant has continued to use the terminology 'green lanes' for continuity from the PEIR.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Visual impact	The assessment of the impact of the development on views from the public rights of way included in this consultation is, in our view, not as comprehensive as it could or should have been in that some views that a public right of way user would currently enjoy have not been considered and very few photomontages are presented. It is quite clear that the impact throughout the site and on the surrounding rights of way will be a significant change from wide open views to views of panels, which it is intended will be mitigated by screening.	N	The Applicant has assessed the impact on views from the public rights of way through the Site as part of ES Vol 1 Chapter 6: Landscape and Visual [EN010141/DR/6.1] . Additional photomontages have been produced since the PEIR and these are presented as part of the ES, including from a number of the PRowS that would pass through the Scheme, such as Viewpoint 33 on ES Vol 3 Figure 5-37 [EN010141/DR/6.3] .
		Screening mitigation, Landscape Management Plan	We encourage you to have a robust landscape management plan that ensures the screening mitigation for rights of way is effective as soon as possible. We would recommend planting the hedging and trees as soon as possible, planting a mix of maturity of plants and a good density of planting with regular maintenance and replacement as required. Further, to the extent that screening is dependent on existing hedgerows we urge you to secure the binding agreement of the landowners concerned to maintain the height of the hedges as appropriate to ensure ongoing screening to preserve the visual amenity of the rights of way.	N	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out how the landscape proposals will be implemented.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Trees and hedgerows, Public Rights of Way	The planting of semi mature trees alongside some rights of way within the site would provide a benefit to users of the local routes. The existing trees alongside the bridleway in Keysoe (past the Grange) are much valued by local walkers and riders.	N	The Applicant notes these comments. The landscape proposals are shown in Appendix A of the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Security cameras, privacy, screening	We also have some concerns about whether security cameras will capture members of the public on the rights of way but understand the need for security which such valuable assets on site. We have been assured that any such cameras will be directed along the lines of the fencing and into the site and not along the public rights of way. If this is the case, then once the screening hedging has matured the privacy concerns of the public should be alleviated but the developer, the operator and the security contractor should be alive to these concerns.	N	The Applicant notes these comments. The CCTV cameras would be aligned to look internally within the Site, not externally.
		Noise and vibration	We also have concerns about the potential for noise from inverters and transformers. The PEIR appears to mainly consider noise around the site rather than within it. The contours presented in Appendix 10.4 are difficult for a lay person to understand but it is clear that the noise levels within the site will be higher than in the surrounding areas. Users of public rights of way are sensitive to noise and experience from the existing site is that the humming sound	N	The Applicant has considered public rights of way as part of the assessment of noise in ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			emitting from such equipment is annoying. Given the scale of this site, it would seem that noise may be audible on most of the public rights of way across the site. Consideration should be given to this aspect with the positioning of noise emitters and potential mitigation addressed.		
		Bridleways, Public Rights of Way	In my November 2023 letter, I indicated that this could be achieved by dedicating bridleways along the various green infrastructure lines within the development. We specified bridleways because that is in line with the Borough's RoWIP and offers benefit to the maximum number of users. A perimeter bridleway would provide an alternative route with less constrained views than the routes within the site which will presumably be bounded, as discussed above, by hedging. These requests have been ignored but we continue to advise that this approach should be adopted, and indeed should be extended to include the possibility of providing some restricted byway access in accordance with the ROWIP 3.2D.	N	The Applicant has provided permissive paths where possible in Site B and Site C. In identifying potential permissive paths the Applicant has had regard to the potential start and end points of such routes, site security, and operational requirements.
		Public Rights of Way, mitigation	Improvement of the rights of way network is one of the few community benefits for local residents and the wider public that may come about as a result of this development, and we consider that the opportunity for such	N	The Applicant has provided permissive paths where possible in Site B and Site C. In identifying potential permissive paths the Applicant has had regard to the potential start

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			<p>improvement should not be missed. We are informed that the Borough Highways team take the same view and have been encouraging you to pursue these options.</p> <p>We understand that the landowners may be reluctant to dedicate bridleways as this is a permanent right that would persist after the decommissioning of the site and, further, that dedication is not within the gift of the developer. Nonetheless we consider the dedication of some routes, particularly those that provide a direct link between existing dedicated bridleways, to be required. Any routes not dedicated must be available on an enforceable permissive basis for the duration of the operation of the site.</p>		and end points of such routes, site security, and operational requirements.
		Environmental masterplan, public spaces	As noted previously, there are some larger areas of grassland indicated on the environmental masterplan for Sites A and B. They appear to us to create some excellent opportunities to provide open access areas to the general public, perhaps including seating areas and information boards. As these areas are largely unscreened, they could provide places where views similar to those lost can be enjoyed.	N	The Applicant notes these comments. The design of permissive paths and provision of furniture are addressed in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .

Table 1.5: Bedford Group of Drainage Boards

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation, assets	Our closest Board is the Alconbury and Ellington which is over 4 Km to the North and will not be affected by any drainage proposal for the development.	N	The Applicant notes these comments.

Table 1.6: Bolnhurst and Keysoe Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Local Plan requirements, landscape, visual impact, loss of character	<p>The Local Plan (Section 37) for Bedford Borough requires that proposals for any kind of development will protect and enhance the key landscape features and visual sensitivities of the defined landscape characteristics, which as noted above is the 'Riseley Clay Farmland' area. There is a requirement for proposals to:</p> <ul style="list-style-type: none"> - Protect and enhance the character and qualities of the local landscape through appropriate design and management. - Safeguard and where possible, enhance key views and vistas. <p>This proposal does neither.</p> <p>The Parish Council is therefore strongly opposed to the development as both inappropriate in scale and in direct contradiction of local planning guidelines and wishes to see the adverse visual and audible effects on villagers eliminated or significantly minimised.</p> <p>The Parish Council believes that any attempt to cut across its concerns and any dismissal of local planning guidelines would be a flagrant contempt of local democracy.</p>	N	<p>The Scheme is being determined primarily in accordance with the National Policy Statements for Energy (EN-1, EN-3, and EN-5). The Applicant has had regard to local plan policy within the Policy Compliance Document [EN010141/DR/5.4].</p> <p>An assessment of landscape impacts and effects is provided in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>
		Proximity of the scheme to houses	In several instances the proposed development is unacceptably close to the village and individual dwellings; with both short- and long-term impacts	Y	In response to consultation feedback, the Applicant can confirm that it has increased the set back of its proposals from Bridleway

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		and villages, mental health, wellbeing of residents	<p>that will irretrievably impair the enjoyment of rural living experienced by those inhabitants.</p> <p>The Parish Council forcefully reject the siting and proximity of solar arrays running close to residents' properties and adjacent to our major access road, the B660. We demand the removal of areas in Zone B shown shaded in blue on the attached map (see Appendix A). If this is approved as per current plans it will impact on the character of the village and its rural setting forever; with a strong possibility of impairments to the mental health and wellbeing of those who will be affected the most.</p>		<p>37 in Site A by an additional 10 metres. This will allow for new woodland planting and screening.</p> <p>The Applicant has provided appropriate setbacks from the B660 and properties alongside the B660, as well as planted mitigation as shown on ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]. The Applicant is of the opinion that the approach taken is suitable to mitigate the effects of the Scheme, and that therefore the areas shaded in blue on the plan do not warrant removal from the Scheme.</p> <p>The Design Approach Document [EN010141/DR/5.7] sets out the design changes that have been made since statutory consultation.</p>
		Visual impact, screening	<p>We also strongly oppose the siting of panels in Zone A that will be on the high ridge that lies on a south-west / north-east axis in the north of the Parish. These would be clearly visible to the village and surrounding area. This is shaded orange on the map (see Appendix A). We suggest relocating these panels to the less visible areas shaded in red on the map at Appendix A, which would make use of existing natural screening.</p>	Y	<p>In response to consultation feedback, the Applicant can confirm that it has increased the set back of its proposals from Bridleway 37 in Site A by an additional 10 metres. This will allow for additional woodland planting and screening. However, the Applicant has not relocated the solar development highlighted as suggested in the consultee's feedback.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Local Plan requirements, visual impact, screening, impact on landscape	It runs against all local planning designed to retain the character of the locality set down in the Bedford Borough Local Plan (Section 37). We do not believe these area and fields beyond can be effectively screened and will always be visible to all inhabitants and visitors entering or exiting the village. This is an unacceptable change to the landscape as defined in the local LCAs and planning guidance in the Local Plan. 40 years cannot be considered a 'temporary installation' and will go beyond the lifetime of the majority of those in the Parish today.	N	<p>The Scheme is being determined primarily in accordance with the National Policy Statements for Energy (EN-1, EN-3, and EN-5). The Applicant has had regard to local plan policy within the Policy Compliance Document [EN010141/DR/5.4].</p> <p>An assessment of landscape impacts and effects is provided in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>
		Noise and disruption, replacement of solar panels, lifespan of solar farms, decommissioning	Given that the solar panels to be used will not last for 40 years, we also want to have clarity on the measures that will be put in place to protect the Parish from noise and disturbance when the panels and inverters require replacing in 15-20 years' time. The Parish Council also questions whether the Panels will be decommissioned after 40 years and, if so, who would pay for this?	N	<p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p> <p>The approach to decommissioning is set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p>
		Screening and	Experience from another local solar installation has shown that the planting of immature screenings	N	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets

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		mitigation, maintenance, visual impact	takes years to develop, and such examples are still completely ineffective after 8 years of growth. We would expect more mature screening to be put in place from the outset and for this to be maintained (e.g. watered and weeded) during the early years. These should be planted before work commences to gain the benefit from unsightly site work.		out how the landscape proposals will be implemented and maintained. The Applicant is proposing permanent on-site staff to maintain the planting to ensure successful establishment.
		Construction phase, disruption, noise pollution, wildlife, loss of habitats, mitigation	There will also be considerable impacts over the short to medium term as the development will take 2- 3 years. The need to pile drive supports for each panel will create significant noise pollution that will not only affect local inhabitants and their domestic animals but likely drive wildlife out of the area too. This will be a sustained impact with proposed working over 5.5 days per week. It is estimated that 300,000 pilings will be required to support the 700,000 panels that have been proposed.	N	The Applicant has undertaken an assessment of the noise impacts of the Scheme in ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] . An outline Construction Environmental Management Plan [EN010141/DR/7.3] has been prepared that sets out measures which will be adopted to control and reduce noise impacts during the construction phase.
		Wildlife, loss of habitats, mitigation	The impact on wildlife is at risk of becoming permanent as the initial noise and disruption, a changed landscape and loss of habitat will not be conducive to many local native species, particularly mammals, especially if there are fences to navigate. The proposed areas of rewilding may look good on paper but are unlikely to fully mitigate this impact.	N	The Applicant has assessed the impact on ecological receptors within ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] . Mammal gates are proposed within all solar fencelines to minimise the impact on small mammals moving around the Site, as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Traffic, impact on local roads, noise	The local roads are not designed for the type of traffic, such as aggregate lorries and heavy plant, that will be necessary to support this type of development. This is likely to cause significant damage to road surfaces and affect the safety of existing road users. The volume of traffic will also increase dramatically as a consequence of the required 500 – 850 workforce, which again has a safety aspect. To minimise the effect of noise for local residents there must be a ban on site work and vehicle movements before 8am on weekdays and 9am on Saturdays, with no Sunday working.	N	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] sets out that construction working hours are proposed to be limited to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00 on Saturday, with no construction work on Sundays or Bank Holidays. Where possible, construction deliveries will be coordinated to avoid HGV movements during the traditional highway AM and PM peak hours (08:00 – 09:00 and 17:00 – 18:00, respectively). Staff vehicle movements are also expected to occur outside of these peak hours.</p> <p>Based on the measures outlined above and elsewhere within ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1], it concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised</p>

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					user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.
		Public Rights of Way, bridleways, access to countryside for recreation, visual impact, economic impact	There will also be an impact on local footpaths and bridleways as some rights of way will be out of use for long periods, perhaps years. This will diminish access for residents and severely reduce the number of people visiting the area for recreational purposes – both in the short-term but also the longer term due to visual degradation; consequently, bringing economic harm to local businesses.	N	<p>It is anticipated that access to all Public Rights of Way will be maintained during the construction phase, with management in place to ensure that all routes can be safely used, including temporary diversion where necessary. This is set out in the outline Public Rights of Way Management Plan [EN010141/DR/7.8].</p> <p>The Applicant has carefully considered the socioeconomic impacts of the Scheme through Chapter 14 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 14: Socio Economics, Land and Tourism [EN010141/DR/6.1]. This estimates that the site area supports nine existing jobs that would be lost as a result of the Scheme. However, it is expected that there would be 20 gross direct full time employee equivalent roles during the operational phase, creating a net gain.</p>
		East Park Legacy	We appreciate the offer of a Legacy Fund to bring a financial benefit to the local area. However, it is vitally important that each Parish Council must have	Y	At the 2024 statutory consultation, the Applicant set out three potential models for how community benefit could be delivered as

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		Fund	clarity in advance on what they will receive and how this will be calculated. We would expect a significant element of the benefit to be paid upfront to compensate for the site work being undertaken.		part of the Scheme, including options which provided lump-sum funding at the start of the operational phase. Following the consultation, the Applicant subsequently announced its intention to deliver community benefit funding in excess of any of the options consulted on previously. The Applicant proposes community benefit funding at a rate of £400 per year per megawatt and will work with relevant stakeholders to determine a suitable delivery prior to operation.

Table 1.7: Cambridgeshire County Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Solar panel lifespan, replacement of panels, Operational phase	Whilst it is outlined there being a construction phase, operational phase and a decommissioning phase, Cambridgeshire County Council queries if there are further phases for the replacement of photovoltaic panels and batteries over the course of the 40 years, understanding both technologies are not anticipated to have a productive lifespan for such a time. (PEIR Chapter 2, Table 2-35 'Indicative Operational Lifespan of Scheme Components' indicates 20–40-year lifespan for such components which we do not consider an adequate description and needs to be supported by evidence.) Currently the PIER does not consider replacement of such infrastructure and the associated impacts. We would welcome further discussion with the promoter and how this can be captured and assessed as part of the Environmental Statement and mitigation measures captured in relevant management plans.	N	The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1] . The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.
		Archaeology, Inverters	In order to determine the potential impact on archaeology, what would the density of the inverters be among the solar arrays (i.e. how many of them will be needed per hectare)? In order to determine the potential impact on archaeology, what would the density of the transformers be?	N	Centralised inverters and transformers would be distributed across the Scheme, with a current estimate that a total of approximately 52 of each would be required, as shown illustratively on ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3] . There is a degree of flexibility in how these

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					components are sited, and as far as practicable it is anticipated these will be located outside of the 'Areas of Archaeological Constraint' identified in the outline Archaeological Mitigation Strategy [EN010141/DR/7.15] .
		Fire risk, water contamination	Further detail is required relating to the management of polluted water including in the event there is an emergency situation such as a fire.	N	<p>The Applicant has prepared an outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10] as part of the application that sets out how the BESS will be managed safely across the lifetime of the Scheme. The oBSMP has been informed by the NFCC guidance.</p> <p>ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline Surface Water Management Plan [EN010141/DR/7.13] set out how firewater would be contained within a drainage basin proposed adjacent to the BESS.</p> <p>To achieve this an impermeable surface would be required for the BESS, likely to be concrete or an impermeable membrane, such that any run-off can be directed towards a retention basin. In normal operation the retention basin would allow rainwater to pass through and drain to a nearby watercourse (as set out in outline Surface Water Management Plan [EN010141/DR/7.13]), but in an emergency situation a valve could be</p>

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					automatically engaged to isolate the retention basin and prevent any run-off for a period of time. This would allow the run-off to be collected and treated in an appropriate way.
		Decommissioning, removal of infrastructure	<p>The decommissioning of the BESS site needs to include the removal of all infrastructure, including underground, in order to avoid long term leaching and to enable the return of the land to agricultural use.</p> <p>We note it is described as part of the Decommissioning Phase 'Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would be left in situ. The principle approach ought to be to seek to recycle as much as is possible and that includes that underground, and to remove all that may cause contamination. We note the promoter commits to returning the site to a condition suitable for its original use, however we would encourage to extend this to 'no less quality than the original use'. Assessment of the soil quality is needed for the duration of the scheme.</p>	N	The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at decommissioning all solar modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be left in situ to reduce the environmental impact of excavation. This approach has been assessed in the ES [EN010141/DR/6.1] .
		Landscaping, mitigation	(Construction of East Park Sites A, B C and D (Months 2 to 30)): (m) 'Establishment of soft landscaping in areas of habitat mitigation'. We would seek soft landscaping works are implemented within the first year of construction, to then enable a two-year establishment and	N	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out how the landscape proposals will be implemented.

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			replacement review with potential remediation strategy.		
		Visual impact, Public Rights of Way	There are concerns about the visual impact on PROWs. This includes the different users of the network including equestrians.	N	The Applicant has assessed the impact of the Scheme on users of public rights of way within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] .
		Decommissioning Environmental Management Plan	It is noted a Decommissioning Environmental Management Plan (DEMP) is proposed for submission. However, the Outline DEMP provided here (Appendix 2-5), and paras. 2.7.5 and 6.8.61 of the PEIR, state that decommissioning impacts are 'assumed' to be less than or no more extensive than construction. This assumption does not provide reassurance of the potential impact of removing piles or below ground cabling in the future. Appropriate detail needs to be included in the DEMP to fully assess the potential impact of decommissioning on below ground archaeological remains.	N	The approach to decommissioning is set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] . An assessment of the impacts of the Scheme during the decommissioning phase is provided in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] . The approach to mitigating archaeological impacts at each stage of the project are set out in the oAMS [EN010141/DR/7.15] .
		Archaeology, cabling, access	A cable route is proposed to cross the newly scheduled Roman town. It would be greatly preferable to reroute this, away from the nationally significant archaeology. I'm aware that this will be drilled at considerable depth, and therefore unlikely to have significant physical	N	Details of the proposed HDD method, including location of the launch and receiving pits and depth are detailed within the oAMS [EN010141/DR/7.15] . Mitigation measures potential for bentonite slurry outbreak are provided in the oAMS

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			<p>impact on the monument, but to fully judge its appropriateness or otherwise further information regarding the technique and depth is needed. Equally, a temporary access road is proposed to cross the scheduled monument. While the information provided suggest that there will be zero below ground impact, more information is needed on what damage might be caused by compression from a volume of heavy vehicles using this road.</p>		<p>[EN010141/DR/7.15] and the outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3].</p> <p>Details of the construction, use and removal of the proposed temporary access track across the Scheduled Monument are presented within the oAMS [EN010141/DR/7.15].</p>
		Archaeology, mitigation, construction, cabling	<p>The appropriateness of the techniques in PEIR Volume 3 Figure 2-3a depends entirely on the depth, nature, and significance of the archaeological remains within the Area of Archaeological Constraint (AAC). Other potential mitigation measures include removing it entirely from development or mitigation by record via archaeological excavation. We do not support 'non-intrusive' construction techniques as the only mitigation. The impact of cabling, inverters, transformers, access tracks within AACs should be considered.</p> <p>Is there an indicative depth that is considered appropriate for directional drilling beneath the Scheduled Monument? The full depth of the remains within the town was only determined within the easternmost trench in the targeted evaluation and is closest to the proposed cable route.</p>	N	<p>The interim archaeological trial trenching reports and geophysical survey report for the completed elements of the fieldwork and survey are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>This updated information has been used to inform the assessments of potential and design and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of this chapter.</p> <p>The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.</p>

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		Outline Decommissioning Environmental Management Plan, archaeology	<p>How will piles be removed? Incorrect removal could conceivably have major impact on archaeological remains.</p> <p>How will care be taken not to impact on archaeology. Measures to mitigate the risk of damage needs to be included in the DEMP.</p> <p>It is noted that careful removal of infrastructure within Areas of Archaeological Constraint (AACs) is proposed. Details of how this will be monitored, for example by the Archaeological Clerk of Works, would be welcome.</p> <p>Furthermore, details for areas outside AACs? If decommissioning is likely to cause major below ground impacts even in areas not originally proposed to be AACs, then the boundaries to AACs may have to take in more marginally significant archaeology.</p>	N	<p>Piles are removed by vibration pulling them out of the ground, there is no excavation required to remove piles.</p> <p>An assessment of the impacts of the Scheme during the decommissioning phase is provided in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>The approach to mitigating archaeological impacts at each stage of the project are set out in the oAMS [EN010141/DR/7.15].</p>
		Ecology, wildlife, habitats, hydrology, surveys	<p>The Council is concerned that ecological features have been prematurely scoped-out prior to the completion of adequate baseline survey work, including habitat and botanical surveys and protected species surveys (bat roosts, Great Crested Newt, water vole, otter, reptiles and wintering birds), as well as arboricultural impact assessment. Furthermore, it is not possible to determine the level of impact of the scheme on these habitats / species.</p>	N	<p>Additional baseline survey work has been undertaken since publication of the PEIR, including of habitats, otter and water vole, great crested newt and breeding birds. Measures are provided in the embedded oCEMP [EN010141/DR/7.3] to ensure legislative compliance, including pre-construction survey, and where required licencing.</p>

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		Ecology, wildlife, habitats, hydrology, surveys	The Council is concerned that the assessment doesn't adequately consider the potential impact on wildlife sites, protected / priority species or habitats. Or particular concern is the impact of solar panels and the BESS (noise pollution) on bird and invertebrates, including invertebrates found in Moor Road Marshy Fields CWS and designatory species of Grafham Water SSSI. As well as Impact of cabling route, including hydrological impacts, on Huntingdon Wood County Wildlife Site / ancient woodland and pond and ancient woodland County Wildlife.	N	<p>Natural England have agreed through Discretionary Advice Service that the risk to Grafham Water is low, as set out in Table 7.4 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>Wintering bird surveys have been undertaken to assess impact pathways on mobile wintering bird features associated with Grafham Water SSSI.</p> <p>Surveys identified an assemblage typical of lowland agricultural habitats in the region and with only low and irregular use by common waterbirds and as such Grafham Water SSSI has been scoped out of assessment.</p> <p>The assessment in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] considers the impact of the Scheme on ecological receptors including statutory designated sites, non-statutory designated sites, priority and irreplaceable habitats and birds.</p>
		Ecology, wildlife, habitats, hydrology, surveys	The site has the potential to support breeding bird assemblage of county importance. We are concerned there will be an adverse impact on nesting habitat for ground nesting birds (supports 104 breeding pairs of skylark), as a result of displacement from fields with solar arrays, and	N	Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat. Mitigation is set out in the

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			consider this to be a significant impact. The scheme must be redesigned to fully compensate for this impact, through removal of solar panels, better proposed management of land for these birds, or expansion of red-line boundary to include habitat to accommodate these birds. If this is not possible, then any residual effect should be resolved through the development of a comprehensive off-site compensatory farmland bird scheme, secured through Section 106.		outline Landscape and Ecological Management Plan [EN010141/DR/7.7].
		Ecology, wildlife, habitats hydrology, surveys	<p>The council does not agree that the following ecological features should be scoped out at this stage:</p> <ul style="list-style-type: none"> - Grafham Water SSSI, given the potential for designatory species (wetland birds) to be affected by solar panels. - irreplaceable habitats - roosting bats, given that an arboricultural impact assessment has not been completed. - notable flora at this stage, given that no detailed botanical surveys have been completed, particularly for arable margins, other neutral grassland and woodland (PEIR Figure 7-3 Habitat Survey). It is considered that an initial habitat survey does not provide an accurate assessment of the importance of a site for arable flora, particularly 	N	<p>Natural England have agreed through Discretionary Advice Service that the risk to Grafham Water is low, stating that "<i>The development does not appear to trigger any of Natural England's Impact Risk Zones ('IRZ's) for any of the sites listed above [including Graham Water]. Our IRZs give a strong indication of where we anticipate impacts from various different types of development, and we therefore consider the application to be of relatively low risk to designated sites.</i>"</p> <p>ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2] sets out ancient or irreplaceable trees habitat (i.e., ancient woodland, ancient or veteran trees) will not be affected. No irreplaceable habitats are present within the Site.</p> <p>Further ES Vol 2 Appendix 2-2: Arboricultural Assessment</p>

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			given their abundance can vary between season / years.		<p>[EN010141/DR/6.2] confirms that no trees are required to be removed to facilitate the Scheme. Measures are also proposed within the embedded oCEMP [EN010141/DR/7.3] to ensure no harm to roosting bats.</p> <p>The baseline habitat assessment (Section 7.6) includes notable flora. The oCEMP [EN010141/DR/7.3] includes for pre-construction surveys, including for arable flora in line with Cambridgeshire County Council comments.</p>
		Ecology, wildlife, habitats hydrology, surveys	The importance of the site for breeding birds had not been adequately considered. The site has the potential to support breeding birds of county importance.	N	Breeding birds have been assigned 'up to county' importance and taken forward for assessment. This remains as it was within the PEIR.
		Ecology, wildlife, habitats hydrology, surveys	No consideration is given to the implications for incomplete wintering birds surveys that were undertaken, with no surveys completed in October. The Council would expect a fully survey season to have been completed.	N	Wintering bird surveys have been completed covering November 2021 to March 2022 and also November 2023 to March 2024. While October was not surveyed, it is considered that adequate baseline information has been gathered to assess the importance of the Site to wintering birds given the absence of any internationally important designated site for nature conservation with non-breeding

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					bird qualifying features (i.e., SAC, SPA, or Ramsar Wetland). Natural England have stated through DAS consultation that risk to Grafham Water SSSI is considered low.
		Ecology, wildlife, habitats hydrology, surveys	The Council expects detailed surveys be completed for trees identified as “possessing potential roost features (PRF) of up to PRF-M” within the site, as well as any trees within close proximity to the site.	N	In line with Collins (2023) only trees subject to impacts require detailed survey. As set out in ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2] , no trees are scheduled for removal and all other works are considered sufficiently low impact that no further survey is required. Suitable protection measures have been implemented through the embedded oCEMP [EN010141/DR/7.3] including pre-construction survey and sensitive construction methods.
		Ecology, wildlife, habitats hydrology, surveys	The Council is concerned that comprehensive surveys of ponds for Great Crested Newts has not been completed, including lack of surveys of pond (P43) located within the Application site. Details surveys must be completed on all three ponds identified on-site and the 23 ponds identified within 250m of the Application site.	N	All ponds within the Site have been subject to survey during 2025. Access was not available to third party land outside of the Site and as such not all ponds up to 250m could be surveyed. Desk study information has been utilised alongside a precautionary approach to inform the assessment
		Ecology, wildlife, habitats	It is unclear why reptiles surveys have not been completed, given the presence of suitable	N	Habitat is considered sub-optimal for reptiles and few desk study records

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		hydrology, surveys	habitat, including 'other neutral grassland' within Site C (PEIR Figure 7-3 Habitat Survey).		relating to this species group were identified. Further, suitable habitats which are restricted to field margins will be largely retained and protected throughout construction and operation of the Scheme. As a precaution, suitable protection measures have been implemented through the embedded oCEMP [EN010141/DR/7.3] including pre-construction survey and sensitive construction methods.
		Ecology, wildlife, habitats hydrology, surveys	Given the present of notable flora records within woodland on Site C, we expect detailed botanical surveys to be completed to confirm its current condition and identify opportunities for enhancement.	N	Woodland will be retained and protected throughout construction and operation of the Scheme with no impacts to the woodland itself or notable flora within.
		Ecology, wildlife, habitats hydrology, surveys	Insufficient evidence has been provided to demonstrate that the scheme will have no impact on Huntingdon Wood CWS. We note that a 15m buffer zone is shown on the Figure 2-2 Illustrative Environmental Masterplan. However, no consideration has been undertaken as to the hydrological impact of digging a trench onto the underlying ground water etc. and the impacts that could have on the woodland.	N	Tree protection plans, including ancient woodland buffer zones, are provided as part of ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2] .
		Wildlife, hydrology,	No consideration has been given to direct or indirect impact of installation of the cabling route	N	Impacts to ponds, including P43 are assessed in Section 7.8 of ES Vol 1

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		watercourses, mitigation, surveys	on pond P43, particularly any hydrological impact.		<p>Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]..</p> <p>No adverse hydrological impacts are anticipated given the works proposed at this location, and the control measures set out in the outline Construction Environmental Management Plan [EN010141/DR/7.3].</p>
		Wildlife, hydrology, watercourses, mitigation, surveys	It is unclear why detailed water vole and otter surveys have not been completed, particularly where the scheme will impact watercourses and adjacent habitat, and potentially pond P43. It will be important to confirm whether there will be any impacts because currently, there is no proposal within the OLEMP to provide watercourses enhancement and as such, no scope to mitigate losses of water vole / otter habitat.	N	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the oCEMP [EN010141/DR/7.3] including pre-construction surveys of suitable aquatic and terrestrial habitats.
		Wildlife, hydrology, watercourses, mitigation, surveys	It is unclear why detailed water vole surveys have not been completed, particularly where the scheme will impact watercourses and potentially pond P43. It will be important to confirm whether there will be any impacts because currently, there is no proposal within the OLEMP to provide watercourses enhancement and as such, no scope to mitigate losses of water vole habitat.	N	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the oCEMP [EN010141/DR/7.3] including pre-construction surveys of suitable aquatic and terrestrial habitats.

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		Wildlife, hydrology, watercourses, mitigation, surveys	There's no recorded white-clawed crayfish records. However, occasionally small remnant populations have been found. We are therefore unclear why eDNA surveys were not completed to confirm their absence.	N	eDNA surveys for white clawed crayfish are not yet approved for the purposes of proving presence/ likely absence for development purposes. Further, suitable aquatic habitats are to be retained and protected throughout construction and operation of the Scheme, with localised crossing points situated primarily in watercourses and ditches lacking the rocky substrate typically required by this species. As a precaution, suitable protection measures are included within the oCEMP [EN010141/DR/7.3] including pre-construction surveys of suitable aquatic habitats.
		Wildlife, hydrology, watercourses, mitigation, surveys	It is disappointing that no consideration has been given to the usage of the site by otters beyond 8m of the watercourses. Further survey work is required to identify potential locations of couches, lay-ups etc that should be excluded.	N	Taking into account the proposed scale of works, further survey for otter (and water vole) has been undertaken on land up to 100m from proposed crossing points. Further, the embedded oCEMP [EN010141/DR/7.3] includes pre-construction surveys of suitable aquatic and terrestrial habitats to identify resting sites. The oCEMP [EN010141/DR/7.3] also includes the requirements for licencing where there is the potential for impact to resting sites.

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		Noise impacts, wildlife	<p>No consideration is given to the impact of noise pollution from the BESS on barbastelle bats.</p> <p>The impact of noise pollution, as a result of the BESS, on breeding bird should also be considered, particularly if it is to be located immediately adjacent to woodland within Site C.</p>	N	Consideration of BESS noise is included within ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] and also within the Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7] .
		Wildlife displacement, mitigation, habitats	<p>The Council requires further evidence to demonstrate how the scheme will mitigation impacts to displacement of ground nesting birds, particularly those associated with nesting in open habitats (e.g. skylarks) because we cannot fin how large areas of open grassland will be managed for “to be of benefit for skylark and lapwing and to encourage nesting attempts within these areas” within the OLEMP. The OLEMP states that the aim of ‘Proposed Grazing Pasture or Neutral Grassland’ will be grazed pasture with “suitable foraging (and potentially breeding) habitat for grassland birds such as skylark”, however, these areas are proposed within solar arrays and therefore unsuitable as nesting habitat for skylarks. While the ‘Proposed Diverse-Species Grassland’, which will provide large areas of open grassland, are only to be only managed as foraging habitat (para 5.2.7 & 5.2.9, Appendix 2-2, OLEMP). We assume management requirements within the Schedule Monument for archaeology may also restrict its ability to support nesting habitat.</p>	N	Mitigation for ground nesting birds will be implemented principally through the provision of high quality species diverse grassland which will increase foraging suitability as well as offering nesting habitat. Details of management of such habitat are provided within the embedded oLEMP [EN010141/DR/7.7] .

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			We therefore require much greater details as to how the habitats will be management and realistically, how many breeding pairs (nest sites) can be achieved within the scheme. Any adverse impacts should be mitigated through creation of additional land for nesting farmland birds within the scheme. Any residual impacts should be addressed through off-site compensation scheme for farmland birds.		
		Wildlife displacement, mitigation, habitats	Given the proposal will result in adverse impacts to (albeit short) sections of in-channel habitat, we would except mitigation to also include enhancement to in-channel & bank side habitat for water vole.	N	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the oCEMP [EN010141/DR/7.3] including pre-construction surveys of suitable aquatic and terrestrial habitats.
		Wildlife displacement, mitigation, habitats	No consideration has been given for adverse impact of solar arrays on the lifecycle of invertebrate species that may lay eggs on the solar panels. Consideration of aquatic invertebrates of the rivers drains, standing water and swamp (e.g. Moor Road Marshy Fields CWS) located within and adjacent to the Application site, particularly species with lifecycles that can be adversely impacted by solar panels.	N	Citation data provided for Moor Road Marshy Fields does not cite invertebrates as a reason for designation. This site is over 250m from the Site and as such is considered sufficiently distanced that adverse impacts to egg laying invertebrates is unlikely to occur. This impact is not well studied, particularly in the UK, however appears to affect predominantly species which lay eggs on water such as mayfly, and caddisfly, and not species of marshy grassland such as at Moor Road Marshy Fields CWS.

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					Regarding larger watercourses, embedded offsets of at least 10m between watercourses and solar panels will alleviate impacts on aquatic invertebrates
		Wildlife displacement, mitigation, habitats	Paragraph 7.8.121 - This assessment is considered inaccurate given that the oDEMP only confirms that woodland and trees will be retained and therefore grassland habitats to be created and managed through the operational stage and recorded as delivering up to moderate beneficial effect (significant) on a range of protected species, including reptiles, amphibians and bats during the operational phase will be lost. Therefore, the decommissioning phase should accurately reflect the loss of these habitats, based on the assumption of their condition to be created within 40 years. The Council is of the view that all habitat that provides significant benefit to protected species and/or delivers priority habitat, or habitat of district/county importance should be retained in perpetuity.	N	<p>The Scheme is being applied for on a temporary (albeit long-term) basis, and post-decommissioning the landscape would be restored with the removal of the Scheme. Any planting proposed as part of the Scheme would be retained at decommissioning and handed back to the landowners.</p> <p>The outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] includes measures to avoid and/ or minimise harm to ecological receptors. Decommissioning will be undertaken in line with all legislation relevant at the time.</p>
		Wildlife displacement, mitigation, habitats	The Council is concerned that the Illustrative Environmental Masterplan fails to adequately mitigation / compensate for the loss of nesting habitat for ground-nesting birds. The scheme must be redesigned to fully compensate for this impact, through removal of solar panels, better proposed management of land for these birds, or	N	Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat. It should be noted that skylark plots are intended to provide

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			expansion of red-line boundary to include habitat to accommodate these birds. If this is not possible, then any residual effect should be resolved through the development of a comprehensive off-site compensatory farmland bird scheme, secured through Section 106.		'landing pads' to access foraging land amongst crops and not to provide nesting locations. As such, provision of managed species diverse grassland offers both foraging and nesting habitat. This is further discussed in relation to ground nesting birds at Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] .
		Assessments and surveys, ponds, habitats, wildlife	PEIR Chapter 7, Paragraph 7.8.108 - this GCN assessment is based on incomplete survey work. GCN assessment of pond P43 (on-site) and an additional 12 ponds (located within 250m) were not completed due to access restrictions. These must be completed. If not, as a precaution, the issue should be addressed through a District Level License application (if applicable).	N	All ponds within the Site have been subject to survey during 2025. Access was not available to third party land outside of the Site and as such not all ponds up to 250m could be surveyed. Desk study information has been utilised alongside a precautionary approach to inform the assessment. Due to presence of great crested newt in ponds in proximity to works a licence would be obtained prior to works as is included within the embedded oCEMP [EN010141/DR/7.3] . Due to the cross boundary location of the Site covering two different licencing schemes and nature of the scheme involving primarily temporary impacts It is proposed that a traditional licenced method statement is obtained from Natural England, instead of the District Level Licence Approach.

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		Assessments and surveys, ponds, habitats, wildlife	The Council is concerned that habitat surveys have not been completed for the entire site. There appears to have been no surveys of the cabling or access routes or around Eaton Socon. In addition, the report doesn't provide description / assessment of all habitats shown on the PEIR Figure 7-3 Habitat Survey, for example other neutral grassland, while the habitat shown in orange is unknown.	N	Habitat surveys have been updated since publication of the PEIR. While not all areas of the Site have been available to access, surveys have covered the vast majority of the Site. Limitations, including lack of access are addressed in ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2] , however a precautionary approach has been taken to assessing habitats including assessment from aerial imagery supported by pre-construction surveys.
		Assessments and surveys, ponds, habitats, wildlife	The Council is concerned that comprehensive surveys for wintering bird was not completed.	N	Wintering bird surveys have been completed covering November 2021 to March 2022 and also November 2023 to March 2024. While October was not surveyed, it is considered that adequate baseline information has been gathered to assess the importance of the Site to wintering birds given the absence of any internationally important designated site for nature conservation with non-breeding bird qualifying features (i.e., SAC, SPA, or Ramsar Wetland). Natural England have stated through DAS consultation that risk to Grafham Water SSSI is considered low

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		Assessments and surveys, ponds, habitats, wildlife	We are concerned that Figure 7-3 shows that habitat surveys have not been completed across the entire site (e.g. access and cabling route and Eaton Soton substation). It is unclear what 'solid orange' areas indicate, while pond (P43), watercourse across Site C, woodland / trees in Site D (shown on Google Earth) and hedgerows are not shown. A 'zoomed in' version of each site should be provided, so that it's easier to identify the type and extent of these habitats.	N	Habitat surveys have been updated since publication of the PEIR. While not all areas of the Site have been available to access, surveys have covered the vast majority of the Site. Limitations, including lack of access are addressed in ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2] , however a precautionary approach has been taken to assessing habitats including assessment from aerial imagery supported by pre-construction surveys. ES Vol 3 Figure 7-3: Baseline Habitats [EN010141/DR/6.3] has been updated to address this comment.
		Illustrative Environmental Masterplan, buffer zones, cable route, hydrology, wildlife and habitats	Pond 43 (Figure 7-7 Location of Ponds) is located along the alignment of the cable route between Site D and Eaton Socon substation. No production measures (e.g. buffer zone) has been identified in the Illustrative Environmental Masterplan (Figure 2-20). Further evidence is required to demonstrate that the installation of the cable will impact the pond either directly (digging within the pond) or indirectly (affecting hydrology and water quality /quantity) of the hydrology of the pond. It would be helpful to identify the land that will be managed as nesting habitat for farmland birds of open habitat (e.g. skylarks).	N	Mitigation measures are set out within the outline Construction Environmental Management Plan [EN010141/DR/7.3] and the outline Surface Water Management Plan [EN010141/DR/7.13] . Mitigation for ground nesting birds including skylark is set out in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] and secured by the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .

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		Consultation materials, PEIR, maps	It would be helpful for all wildlife sites to be named - Moor Road Marshy Fields County Wildlife Site located south of site C is not labelled	Y	Figures have been updated to reflect this.
		Landscape, character, biodiversity, habitats, construction	<p>The Council welcomes the preparation of the Outline Landscape and Ecological Management Plan, however we are concerned that it doesn't fully address adverse impact to biodiversity (particularly farmland birds), nor does it propose to enhance all existing habitats (e.g. ditches) present within the Application Site. Further detail is also required to ensure the scheme is resilient to climate change and reflective of local landscape character.</p> <p>The development of the Landscape and Ecological Management Plan and its implementation should be overseen by a steering group, comprising local authority officers (landscape, ecology, archaeology, rights of way etc.) and local interested groups (e.g. Wildlife Trust) and local experts to advise on monitoring and management of the site throughout the 40 years. Funding for this group should be secured as part of this planning application.</p> <p>All compensatory habitats must be created prior to the removal of existing habitats for protected / notable species, for example nesting habitat for ground-nesting birds.</p>	N	<p>The oLEMP [EN010141/DR/7.7] includes measures to enhance the Site for biodiversity, including for farmland birds. The oLEMP [EN010141/DR/7.7] includes the management of ditches and watercourses.</p> <p>Despite BNG not being a statutory requirement at the point of submission, the Applicant is proposing significant overall BNG improvements as evidenced by the Biodiversity Net Gain Report [EN010141/DR/7.17].</p> <p>The oLEMP [EN010141/DR/7.7] includes the creation of a Steering group to which relevant local authority and interested groups will be invited.</p> <p>It is anticipated that advance seeding will occur to ensure habitats are able to establish prior to the onset of construction, however some landscaping works will need to be phased.</p> <p>The oCEMP [EN010141/DR/7.3] includes the requirement for an EcoCoW</p>

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			<p>Greater consideration must be given for protection of ground-nesting birds that may nest on areas of bare earth / arable fields during construction phase.</p> <p>We are concerned that trees present within the site, which has the potential to be removed as part of the scheme, have not been surveyed to identify them to support roosting bats.</p> <p>(4.2.26 – PEIR Appendix 2-2 Outline Landscape and Ecological Management Plan) Any works within 10m of the ditch bank should be subject to a pre-construction inspection.</p>		<p>to be appointed for the duration of works and for pre-construction surveys.</p> <p>In line with Collins (2023) only trees subject to impacts require detailed survey for roosting bats. As set out in ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2], no trees are scheduled for removal.</p> <p>Ditches and watercourses include minimum 10m buffer zones, with the exception of localised crossing points. These crossings will be subject to pre-construction surveys as specified in the oCEMP [EN010141/DR/7.3].</p> <p>The oLEMP [EN010141/DR/7.7] specifies timescales for hedgerow and tree planting and contingency measures in the event of failure.</p> <p>The species suggested have been included, alongside a range of other species representative of the locality.</p> <p>Management of habitats (including hedgerows) will result in an overall gain for biodiversity including farmland bird species.</p> <p>Reference to ground nesting birds breeding amongst panels is not included. Such species will however nest within open areas of grassland proposed.</p>

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					<p>The fence line will include regularly spaced mammal gaps to allow access for mammals.</p> <p>On decommissioning the land would be returned to the landowner with landscaping works left in place</p> <p>On decommissioning the landscaping would be left in place and the land handed back to landowners, the only exception being the potential requirement by landowners to revert the areas currently used for arable farming to be returned to this condition. As the land would be handed back to the landowners on completion of decommissioning, the long-term retention of the landscaping improvement works cannot be guaranteed.</p>
		Hedgerows, woodland, screening, mitigation	<p>In Cambridgeshire, we have seen high failure rates of new hedgerows and tree planting as a result of dry conditions. It is important that planting is completed in Oct – Dec, so allow establishment before any dry weather (from spring onwards). Consideration should also be given to usage of cellular rather than bare-root stock.</p> <p>We have seen high failure rates of new hedgerows and tree planting as a result of dry conditions. A comprehensive watering</p>	N	The oLEMP [EN010141/DR/7.7] specifies timescales for hedgerow and tree planting and contingency measures in the event of failure. The oLEMP includes measures for watering during periods of drought.

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			programme must be implemented for all new planting during the establishment phase.		
		Woodland, screening, mitigation, habitats	The proposed woodland planting stock list should be further discussed with local authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease).	Y	The Applicant has carried out further consultation and updated the indicative species list within the oLEMP [EN010141/DR/7.7] . The species suggested are all native species representative of the locality.
		Mitigation, habitats	We understand the proposed grazed pasture / neutral grassland is proposed within the fields with solar arrays, which are highly unlikely to provide suitable breeding habitat for ground-nesting species. Therefore, suggest Is considered unlikely that grassland within the solar panel arrays will provide suitable breeding habitat for ground-nesting birds. Suggest reference to breeding habitat is removed, unless evidence can be provided to substantiate these claims.	N	Reference to ground nesting birds breeding amongst panels is not included. Such species will however nest within open areas of grassland proposed.
		Screening, fencing, wildlife movements	Gaps should be provided within the fence line, or fences raised off the ground, to allow access to solar array fields by mammals. However, it should also be confirmed that no mammal access should be provided within areas identified	N	The fence line will include regularly spaced mammal gaps to allow access for mammals, as set out in the oLEMP [EN010141/DR/7.7] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			as potential nest sites for ground-nesting bird, to help control predation and maximise successful fledging.		
		Decommissioning, biodiversity, habitats	The Council is concerned that after decommissioning, habitats of important for biodiversity, including species-rich grassland and well as any other habitats of local / county value which have developed through the lifetime of the scheme, may be lost following returning land to the landowner. This would effectively result in a loss of biodiversity value as a result of decommissioning and therefore, the Council seeks these habitats are retained in perpetuity. The OLEMP does not consider the management restrictions of schedule monument to protect its archaeological interest. Confirmation sought as to how the grassland can be managed for nesting ground birds and archaeological interest.	N	<p>On decommissioning the land would be returned to the landowner with landscaping works left in place</p> <p>On decommissioning the landscaping would be left in place and the land handed back to landowners, the only exception being the potential requirement by landowners to revert the areas currently used for arable farming to be returned to this condition. As the land would be handed back to the landowners on completion of decommissioning, the long-term retention of the landscaping improvement works cannot be guaranteed.</p> <p>The proposed management of grasslands is described within the oLEMP [EN010141/DR/7.7].</p>
		Ecological mitigation, Outline Construction Environmental Management Plan	The ecological mitigation set out in Table 5.3 is very brief and should be expanded. Greater consideration should be given to impacts of water pollution, particularly on pond P43. More detailed methodology for pre-commencement surveys should be provided, for example – what length of watercourse will be addressed for water vole? Compensatory habitat must be constructed	N	Ecological protection, mitigation and enhancement measures are set out in the oCEMP [EN010141/DR/7.3] and oLEMP [EN010141/DR/7.7] , as well as in Section 7.9 of this chapter. This includes pre-commencement surveys.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			prior to commencement of habitat destruction works.		This chapter includes an assessment of impacts to on-Site and off-site habitats, including of water pollution.
		Surface water drainage	The proposals have also given consideration for access for maintenance of the existing and proposed surface water drainage features. It is proposed that 3m maintenance strips are provided to the swales which is supported by the LLFA. The promoter should ensure that all watercourses are maintained and remediated (where necessary) throughout each phase of the development, with obstructions to flows (such as debris, litter, and fallen trees) removed.	N	The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how the drainage features across the Site will be managed as part of the Scheme.
		Surface water drainage, soil erosion, flood risk	It is proposed that appropriate measures will be remediated and retained during the operational which is also supported by the LLFA phase and we look forward to more details being provided. However, these aspects mainly focus on the access tracks and Battery Energy Storage System (BESS) areas. Rainfall upon solar arrays is generally shed between rows and allowed to run onto the ground. This concentration of water flow can create channelised flows which can erode the soil and allow a greater volume to enter watercourses or flow to adjacent areas at a greater rate than would otherwise occur in greenfield conditions. Therefore, further consideration should be given to drainage of the PV areas - particularly during the establishment	N	Further consultation with CCC led to agreement that solar panels should not lead to channelisation assuming that vegetation is established and well maintained, particularly during the first 5 years of operation. The maintenance regime of the grassland under panels has been described in detail within the oSWMP [EN010141/DR/7.13] and oLEMP [EN010141/DR/7.7] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			of vegetation. This may include the inclusion of filter drains between solar arrays or swales at the lowest points of the site to prevent channelling of water and promote infiltration.		
		Surface water drainage, soil erosion, flood risk	High surface water flood risk is present on both sites C and D. Altering natural flow paths should be avoided where possible and consideration should be given to the design and layout of the BESS.	N	Alteration of ground levels within the PV panels is not proposed, so natural flow paths will not be altered as set out within the oSWMP [EN010141/DR/7.13] . The BESS has been located within an area with only minor encroachment of surface water flooding, with no upstream catchment (i.e. should have no impact on surrounding flows), as agreed with CCC in further consultation.
		Surface water drainage, soil erosion, flood risk	<p>What we require under the wider DCO:</p> <ul style="list-style-type: none"> a) Hydraulic calculations including the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storms. FEH 2022 rainfall data required and suitable climate change for 3.3% and 1% AEP. b) Details drainage layout plans for the PV rows and BESS unit areas for each catchment. c) Detailed SuDS and drainage proposals to protect the receiving watercourse for the construction, operation and decommission. 	N	<ul style="list-style-type: none"> a) To be provided within the detail design b) To be provided within the detail design c) To be provided within the detail design d) All available fluvial modelling results obtained from the EA relevant to the Site, however no infrastructure located within fluvial flood zones (including FZ2 – 0.1% AEP). Surface water mapping also reviewed up to the 0.1% AEP event and discussed in further consultation with CCC, with reference to placement of

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> d) Modelling for the 0.1% AEP SWFR extent not available – Figure 8-3 e) Demonstration of pollution risk areas and how water is managed during all stages in detail for each catchment, ensuring water is suitably managed at all stages. f) Infiltration testing to confirm rates if viable. g) Flow rates for each individual catchment. h) Maintenance proposals in line with best practice guidance i) Sight of the Watercourse Crossings Review document 		<p>infrastructure. Agreed no further modelling is required.</p> <p>e) Pollution risk areas addressed within the oCEMP [EN010141/DR/7.3].</p> <p>f) Infiltration testing to be completed during detailed design.</p> <p>g) Rates /ha provided in ES Vol 2 Appendix 8-1: FRA [EN010141/DR/6.2] can be applied to the whole site, or individual parcels of land. The benefits of determining hydrological catchment areas isn't considered necessary when designing SuDS, where the developed area is important. No cross catchment flows are designed.</p> <p>h) The oSWMP [EN010141/DR/7.13] includes a maintenance plan for all SuDS feature types employed in the scheme.</p> <p>i) See watercourse crossing assessment as ES Vol 2 Appendix 8-3 [EN010141/DR/6.2].</p>
		Access, highways	It is noted no details have been provided regarding the geometric layouts of the proposed accesses to the public highway. Cambridgeshire County Council would ask this is provided.	N	Detailed design of site access would be undertaken subsequent to DCO approval.
		Access, highways	Access SA16:	N	It is noted that a small portion of the required visibility to the north-west at this

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			<p>Given the amount of access movements, consideration should be given to the signalisation of this main access through peak hours of operation which may require a temporary traffic regulation order to reduce the speed limit locally, on the approaches to the signals.</p> <p>Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used.</p> <p>Can the promoter confirm the level of use for this access at the operational phase and any changes to the access between construction and operational.</p> <p>After comparison with highway boundary records, the visibility splays shown appear to fall outside the highway extent. This contradicts the statement at 2.4.154 and 2.4.155. There may be features present on the ground, which are not captured on mapping, that alter the assumed location of the highway boundary. For example, not all ditches are shown on Ordnance Survey mapping, but these are generally considered not to form part of the highway. Therefore, any proposed visibility splay will need to be considerate of on-the-ground features and not simply modelled from a map. Acquisition of additional land may be required to ensure visibility splays can be delivered as part of the highway.</p>		<p>access falls outside of the adopted highway boundary. However, the required visibility splays are achievable within the public highway or in land under the Applicant's control, with no recourse for third-party land. It will be a provision of the DCO that existing features will be managed to maintain visibility, and no obstructions would be erected within the visibility splays.</p> <p>A swept path analysis of the proposed access junction has been undertaken as part of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p> <p>Consideration of traffic management measures is included within the outline CTMP [EN010141/DR/7.4].</p> <p>ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] provides a breakdown of the forecast traffic generation during the construction phase.</p>

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		Access, highways	<p>Accesses SA14 and SA15:</p> <p>Observed vehicle speeds are indicated at 41.4 mph 85%ile speeds. As this is above the MfS threshold of 37mph this would require to be derived from DMRB not MfS criterion. Correct splays need to be 109m not the indicated 69m. Cambridgeshire County Council asks the available splays to be increased in these locations and to supply locations of speed surveys and data.</p> <p>The visibility splay shown for Access SA14 appears to extend outside of the highway. It is shown cutting into a hedge feature. Hedges are not considered to form part of the highway and would typically be a boundary feature. There is evidence to suggest the hedge feature in this location is not the boundary, as it is situated at the rear of a ditch that runs along Moor Road. The highway only extends to the top of the carriageway-side slope into the ditch and therefore the proposed visibility line extends outside the highway.</p>	N	<p>The site accesses will be situated within a section of Moor Road featuring several sharp bends. As such, it is likely that vehicle speeds in the vicinity of the accesses will be significantly lower than the observed speeds used in the visibility calculations.</p> <p>Accesses SA14 and SA15 would also only be used during the construction and decommissioning phases. Use of these accesses would therefore be relatively infrequent. It is therefore considered that interpolating from MfS visibility distances in this case is appropriate. The required visibility splays are achievable within the public highway or in land under the Applicant's control, with no recourse for third-party land.</p> <p>Consideration of traffic management measures to control vehicle speeds in the vicinity of these accesses is included within the outline CTMP [EN010141/DR/7.4].</p>
		Access, highways	<p>Access SA13:</p> <p>Access is indicated within document PIER Fig 2-5 however there are no details of traffic movements associated with this access. The promoter should be invited to clarify why it is necessary to use this element of public highway.</p>	N	<p>Visibility splays for this access have been considered within ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p> <p>This access would only be used during the operational phase. Access would be</p>

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			<p>Mitigation measures are needed on Moore Road to accommodate construction traffic. Details of traffic movements associated with this access should be provided during and after construction.</p> <p>Visibility splays do not appear to have been supplied for this access point. Proposals for this access point to be clarified. Applicant to note that there are physical features in this location that might cause the legal extent of the highway to be questioned.</p>		generally by maintenance staff in a large van or 4x4, and would be relatively infrequent, commensurate with the existing use of the access by agricultural traffic. The requirement for HGVs to travel along Moor Road to this access would be highly infrequent.
		Access, highways	<p>Access SA12</p> <p>Access visibility looks to be in accordance with recorded speeds. We ask the locations of speed surveys and data are supplied. Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used. It is noted that no traffic is indicated to be going into or coming from Great Staughton. Could we ask the promoter to confirm this is the case?</p> <p>Following the inclusion of access SA12 as a construction route into and from sites A and B it requires the use of both Great Staughton Road from the Zantra access to the West and Spring Hill Road. Details of the visibility splays at the junction of Spring Hill Road should be provided and the details of the geometry of this junction along with tracking to ensure it is suitable for two-way simultaneous movements of the largest vehicles likely to use this junction. Tracking should also be supplied from the Zantra access</p>	N	<p>The Applicant's construction access strategy is set out ES Vol 1 Appendix 9-1: Transport Assessment [EN010141/DR/6.2], with mitigation secured by the outline Construction Traffic Management Plan [EN010141/DR/7.4].</p> <p>It is acknowledged that the use of an internal haul route connecting directly to access SA11 could be preferable in some regards to routing construction traffic via Great Staughton Road via access SA12. However, the Applicant does not have land rights to create an internal haul route that avoids use of access SA12, and has demonstrated that the use of access SA12 is suitable without unacceptable adverse highway impacts. Access SA12 has therefore remained part of the proposed access strategy for the DCO submission.</p>

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			<p>(SA12) to the accesses SA10 and SA11 on Spring Hill for largest vehicles likely to use this road simultaneously to ensure it is suitable.</p> <p>Similar to Moor Road the promoter should be invited to clarify why it is necessary to use this element of public highway (Great Staughton Road/Spring Hill?) When the access to SA 11 could be routed similarly internally removing any issues with construction and staff vehicles using the public highway? It is noted that the access track/ cable route adjoins site C, South of the Zantra access. I can see no benefit in using the public highway when a further access track adjacent the route of the cable would remove many issues.</p>		A swept path analysis of the proposed access junction has been undertaken as part of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] .
		Access, highways	<p>Accesses SA10 & SA11:</p> <p>Northern Junction splays indicated at 2.4m x 103m based on 39.9mph recorded speeds which is acceptable. Please supply speed date and location of survey.</p> <p>Southern junction splays indicate 2.4m x 119m based on 43.6mph 85%ile recorded speeds which is acceptable. Please supply speed date and location of survey.</p>	N	Visibility splays have been assessed against adopted highway boundary data. The required visibility splays are achievable within the public highway or in land under the Applicant's control, with no recourse for third-party land.
		Access, highways	Visibility splays should be checked against highway records to ensure required visibility is achievable within public highway. Any highway boundary data that has previously been supplied	N	Visibility splays have been assessed against adopted highway boundary data. The required visibility splays are achievable within the public highway or in

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			by Cambridgeshire County Council is likely to be indicative in nature. Such data is a digital representation of the legal highway records that has been plotted as accurately as possible against Ordnance Survey mapping. However, owing to the inherent differences in accuracy between OS data and topographic surveys, users of highway boundary data should exercise caution when overlaying this information with topographic or other site survey data. Features on the ground may not be in the same location as those shown on any highway extent plans or data. Physical features present on the ground (such as ditches or embankments etc) will affect the extent of the public highway that exists on the ground. Where there is any doubt as to the physical public highway extent, please contact the Highways Records team at Cambridgeshire County Council for further guidance.		land under the Applicant's control, with no recourse for third-party land.
		Traffic and highways, site access	<p>PEIR Chapter 9</p> <p>9.6.21 ATC have been undertaken on straight sections of roads only, the only information this will give is the number of vehicles using that part of the road daily. No junction counts have been undertaken. Typically, capacity issues relating to highway in this area happen at junctions, and therefore junction counts will better inform proposals.</p>	N	ATC data was obtained in order to calculate AADT and AAWT traffic flows, which are required in order to assess environmental impacts. Section 5.5 of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] identifies that the Scheme would not generate more than 30 two-way movements during peak hours, which is the threshold at which junction assessments are required as identified in

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					Cambridgeshire County Council's Transport Assessment Requirements.
		Traffic and highways, site access	9.6.26 The use of Crash Map is not acceptable as it does not contain the most up to date data. Accident data must be obtained from Cambridgeshire County Council. This data will also highlight any cluster sites.	N	Comment noted. Current accident data has been obtained from Cambridgeshire County Council.
		Traffic and highways, site access	9.8.20 A percentage impact assessment does not show how the network or junctions are currently operating. Cambridgeshire County Council would seek further discussion with the promoter as to how this can be shown.	N	A percentage impact appraisal is required in order to assess environmental impacts. Section 5.5 of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] identifies that the Scheme would not generate more than 30 two-way movements during peak hours, which is the threshold at which junction assessments are required as identified in Cambridgeshire County Council's Transport Assessment Requirements.
		Traffic and highways, site access	9.8.22 Note Cambridgeshire County Council's Transport Assessment Requirements requires all junctions which experience more than 30 new movements in either peak to be modelled.	N	A percentage impact appraisal is required in order to assess environmental impacts. Section 5.5 of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] identifies that the Scheme would not generate more than 30 two-way movements during peak hours, which is the threshold at which junction assessments are required as identified in

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					Cambridgeshire County Council's Transport Assessment Requirements.
		Traffic and highways, site access	Further information as identified above is asked to be added and included in the application when it is submitted. The proposed trip rates are not evidenced or justified, and a percentage impact assessment does not show how the highway network is currently operating and therefore does not show what impact the development will have on the network.	N	The Applicant notes this comment and has provided responses in the rows above.
		Construction traffic	9.7.1 HGVs movements should seek to avoid driving through Great Staughton, instead utilising haul roads.	N	Comment noted. Proposed construction access route has been designed so that no HGV movements will pass through Great Staughton. This is set out in the oCTMP [EN010141/DR/7.4] .
		Construction traffic	9.8.6 and Table 9.12: Estimated Construction Traffic - We invite the promoter to provide further evidence of their estimated construction traffic.	N	Detail of the forecast breakdown of construction traffic movements across the construction programme is included in ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] .
		Construction traffic	9.8.8 The promoter's assumptions are based on HGV's not entering the site during the network AM/PM peaks. Therefore, this would need to be secured through a Requirement for a	N	The outline CTMP [EN010141/DR/7.4] outlines the proposed restrictions on HGV routes and timings, to reduce the Scheme impact on the highway network. A requirement of the draft DCO EN010141/DR/3.1] secures that these

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			Construction Traffic Management Plan to be approved by the Local Highway Authorities.		measures are developed in detail and complied with.
		Construction traffic	<p>9.8.10 In addition to the HGV movements the promoter is suggesting an additional 854 staff visiting the site per day. The promoter has assumed staff would car share and is stating a worst-case scenario of 854 two-way staff movements per day. Again, these assumptions have not been evidenced or data provided to support them.</p> <p>If there are 854 staff and all drive, then there will be 1708 two-way vehicle movements per day. Whilst this is unlikely, no justification has been provided on how many staff will car share.</p>	N	The outline CTMP [EN010141/DR/7.4] document has been submitted outlining the measures proposed to mitigate the transport impacts. A requirement of the draft DCO [EN010141/DR/3.1] secures that these measures are developed in detail and complied with.
		PEIR Chapter 15, climate change, emissions	Overall, The Council would agree that the scheme is likely to have a beneficial significant effect on GHG emissions. However, we disagree with the statement that 'no additional mitigation is required'. Steps should be taken to minimise the GHG emissions, especially from embodied carbon, through the detailed design process.	N	<p>Cambridgeshire County Council agree with approach used for the GHG Emissions Assessment within the PEIR. No changes to the approach have been made when producing ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2].</p> <p>Cambridgeshire County Council mostly agree with the conclusions of GHG Emissions Assessment within the PEIR. However, Cambridgeshire County Council disagree with the statement that 'no</p>

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					<p>additional mitigation is required'. Additional mitigation has been recommended in ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1] to minimise the GHG emissions, especially from embodied carbon, through the detailed design process.</p> <p>Cambridgeshire County Council agree with Climate Resilience Assessment within the PEIR. No changes have been made when producing ES Vol 2 Appendix 15-3: Climate Resilience Assessment [EN010141/DR/6.2].</p>
		PEIR Chapter 16, waste, recycling	We invite the promoter to provide more detail as to what is meant by 'vast majority' of PV infrastructure being recycled providing more of a breakdown to better understand the impact.	N	<p>The Applicant has provided an updated assessment of potential waste impacts in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>Waste will be managed in accordance with the outline Waste Management Plan [EN010141/DR/7.12], as well as the outline Construction Environmental Management Plan [EN010141/DR/7.3], outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					The Applicant notes the decision by the Secretary of State in determining the East Yorkshire Solar Farm DCO (<i>ExA report ref 3.13.50 and 3.13.51</i>) that although the capacity of facilities to handle decommissioned solar PV panels is still developing, the recycling industry is likely to respond to demand over time.
		Traffic, waste, air, pollution, noise, health impacts, cumulative impacts	<p>It appears that matters pertaining to traffic; air, dust and odour; hazardous waste and substances; noise; have been discussed however the Council remain concerned it is limited and has not considered mental health impacts resulting from visual amenity, given the size, scope and timeline of this project. A further concern is around the cumulative health/ mental health impacts from the development in conjunction with surrounding shortlisted development (the additional solar farms, East West Rail etc).</p> <p>We would like to see a Mental Health Impact Assessment as standalone document or mental health addressed as part of Health in the ES.</p>	N	<p>The Applicant has undertaken a human health assessment in line with IEMA guidance in ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>A separate Residential Visual Amenity Assessment (RVAA) has been prepared and is submitted as ES Vol 2 Appendix 5-7 [EN010141/DR/6.2] of this application.</p> <p>The human health assessment concludes that the Scheme will not result in significant effects on human health. Consideration has been given to the possible mental health effects, which are identified in Table 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1], including stress, anxiety and worry. These impacts would be short-term during construction, and unlikely to be significant.</p> <p>A human health assessment was scoped out of the ES, and therefore a specific</p>

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					cumulative human health assessment of the Scheme in combination with other emerging schemes has not been undertaken. However, separate cumulative assessments have been undertaken across the remainder of the ES (as set out in ES Vol 1 Chapter 17: Cumulative Effects [EN010141/DR/6.1]), which concludes there would be no significant cumulative effects resulting from the Scheme.
		Community safety, BESS, health, fire risk	‘No health pathway has been identified between the Scheme and this wider determinant of health’ The Council would like to raise a question regarding the BESS considerations (Battery Storage). We would like to gain more information about health (including fire risk and EMF) of those in proximity to the BESS in the Outline Battery Fire Safety Plan.	N	The BESS has been located away from close residential receptors, with the closest residential receptor more than 500m from the BESS. Consideration of fire risk at the BESS has been set out under Major Accidents and Disasters in Section 16.4. The BESS will be managed in accordance with an outline Battery Safety Management Plan [EN010141/DR/7.10] that includes provision to notify local residents in the extremely unlikely situation that an incident occurs. Mitigation measures include warning residents on the health effects of smoke and ways to reduce exposure, such as staying indoors and closing windows, or moving to a cleaner air location.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Cumulative impacts, construction phase, community impacts	The Council has concerns around the community resilience to construction phase with simultaneous decommissioning of certain elements and associated impacts for 30 months with the intra-project cumulative effects as well.	N	As set out in the outline Construction Environmental Management Plan [EN010141/DR/7.3] , the Applicant has committed to setting up a Community Liaison Group at the outset of construction to function as an open forum and ensure dialogue with representatives of the local community, and local councils.
		Substation	The Council would like to raise a Substation expansion query – regarding community impacts on residents in the St Neots Area – we would like to review the EHO responses so that we can have a discussion with the promoter regarding any possible impacts.	N	The Applicant notes this comment.
		Public Rights of Way	Where any works are required within PROW, for example where construction access or cable routes utilise or cross Public Rights of Way, then prior to the commencement of development, a condition survey needs to be submitted to and authorised by Cambridgeshire County Council. The restoration of paths to an acceptable condition must also be authorised by CCC.	N	The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application that sets out the approach to be taken for each public right of way that intersects the Order Limits.
		Public Rights of Way	There are two Definitive Map Modification Order (DMMO) applications within the Cambridgeshire section of the proposed development. Without prejudicing the outcome of these applications, we would request that permissive rights for	N	The Applicant is aware of one DMMO application that intersects the Site (Case Number M206 - LH) to create a bridleway. The Applicant has not provided a permissive path along this route at this

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			equestrians and cyclists are provided along those routes until either the lifespan of the development ends, or in the case of the DMMO application being upheld, public bridleway(s) are confirmed along the routes. This would provide improved east-west off-road connectivity for non-motorised users which would support the aims of the Cambridgeshire County Council Rights of Way Improvement Plan.		stage, as any such path would terminate at the southern end of the Site without providing any onward route. The Applicant would consider the creation of a public right of way along this route, and to potential future permissive path provision in this location.
		Public Rights of Way	There is an opportunity to provide a new circular permissive bridleway around the edge of the proposed grassland area on the Northeastern side of Site D, which would extend the options of circular routes available to the benefit of Great Staughton residents. Information boards could be placed to explain the value of the proposed scheduled monument.	N	The Applicant notes this comment. A bridleway has not been included around the northern edge of Site D at this time, however a permissive path for the duration of the Scheme could be provided at a later date.
		Public Rights of Way	<p>The Council note that after ten years and once planting is established there will still be significant levels of impact on the visual receptors of the following paths:</p> <ul style="list-style-type: none"> Little Staughton Parish: Public footpath 312/1: Moderate-Major Adverse (Significant) Hail Weston Parish: Public footpaths 112/5, 112/6, 112/7 and 112/8: Moderate Adverse (Significant) 	N	<p>The Applicant's assessment of potential visual impacts on public rights of way users is set out in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR6.1].</p> <p>The proposed management of public rights of way is set out in the outline Landscape and Ecological Management Plan [EN010141/DR.7.7].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			This has the potential to diminish the public enjoyment of the PROW network. Taking this into account, we would seek that the scheme proactively delivers, or provides appropriate funds for, public rights of way, or public access improvements within the landscape and visual assessment study area, to mitigate the loss of visual amenity on the routes listed above.		

Table 1.8: Cambridgeshire and Bedfordshire Fire and Rescue Services

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	BESS, fire risk	The type of BESS container will make a difference to the Fire Service's ability to fight fires and ensure the protection of BESS site workers. The older design takes the form of shipping containers that staff enter to carry out their work. The newer style is a cabinet-based approach with doors on the outside of the unit to allow access to the battery trays and electrical components. This reduces the risk to employees and Fire staff who would not need to enter the container to search for employees. This information should be submitted as early as possible to allow an initial appraisal to be made.	N	The current proposal is that BESS containers will not have an internal corridor but will instead be serviced by doors on the outside of the units. While procurement will not take place until after consent is secured, it is very unlikely that the final system design will include BESS units with internal access.
		Spacing between cabinets, BESS, fire risk, risk management	<p>The National Fire Chief's Council (NFCC) does not support the vertical stacking of containers or units on top of each other on the basis of the level of risk from the vertical fire spread between the BESS, the fire loading and the difficulty in gaining access.</p> <p>The emergency response plan should be predicated on the scenario of the fire will not spread beyond the BESS container of origin. Fire and rescue operations should be limited to boundary cooling of surrounding BESS and monitoring the BESS involved in the thermal event.</p> <p>This outcome can be achieved through several different routes including:</p>	N	Vertical stacking of containers is not proposed. It is proposed that the BESS system finally procured will have undergone large-scale fire testing to demonstrate that propagation does not occur between containers. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> Adequate separation between the BESS enclosures to ensure that radiant heat from a thermal event in one BESS will not trigger a secondary event. Provision of fire-resistant materials that will prevent direct flame impingement or radiated heat affecting adjacent BESS and allowing the incident to develop beyond BESS of origin. <p>The provision of a suppression system to the BESS is unlikely to provide a compensatory feature to allow reduced spacing between BESS. If the developer cannot demonstrate that a thermal event / fire can be contained to the BESS of origin, then the developer should be referred to guidance such as the separation distances within NFPA 855 (current edition - 2023).</p>		
		Battery type, fire risk	It should be determined what style of batteries are to be used and that the appropriate testing has been carried out. Whilst there are different characteristics of lithium-ion batteries (e.g. NMC, LFP and other chemistry types) involved in a fire, the overall risks they present to firefighters are similar. Specifically, they may all involve toxic, flammable and / or explosive vapour clouds. They may also result in intense flaming combustion.	N	It is likely that lithium iron phosphate (LFP) battery cells will be used. The selected battery units will have undergone large-scale fire testing and, if relevant, full scale destruction testing to fully understand the risks and to inform the final design. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].
		Fire detection, batteries, battery	An effective and appropriate method of early detection of a fault within the batteries should be in place, with immediate disconnection of the affected	N	Effective and appropriate early detection systems will be in place such as BMS, off-gas sensors, heat sensors and smoke sensors.

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		management system, risk management	<p>battery / batteries remotely. This may be achieved through the provision of an effective battery management system (BMS). Specific electrolyte vapour detection systems are available and may be helpful but should not be relied on in isolation as a precursor to a thermal event.</p> <p>Detection systems should also be in place as part of the risk management process to alert the operator of an event at the site. Appropriate automatic detection such as smoke, gas or radiant heat detectors, as well as continuous combustible gas monitoring within units should be provided in all ESS. Gas detectors should alarm at the presence of flammable gas, shut down the ESS, and cause the switch over to full exhaust of the ventilation system. Sensor locations should be appropriate for the response times, and types of gas detected e.g. hydrogen, carbon monoxide and other volatile organic compounds. External audible and visual warning devices, as well as addressable identification at control and indicating equipment, should be linked to:</p> <ol style="list-style-type: none"> 1. Battery management system (when a thermal runaway event is identified) 2. Detection and suppression system activation <p>This will enable first responders to understand what the warning is in relation to, aiding their decision-making and the formation of an incident plan.</p>		The system will be automatically shut down in response to certain triggers and the operators will be alerted. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].

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		Fire suppression systems	<p>The primary role of a fire suppression system in a BESS is to prevent a fire in the ancillary electrical equipment spreading to the battery modules. It may have a limited effect to protect the BESS from an external fire spreading to it. All claims of performance of suppression systems need to be supported with appropriate evidence for that specific use case.</p> <p>The suppression system, regardless of type, will have little effect on a thermal event within the battery cell. Any effectiveness they have will be in preventing cell to cell propagation, rather than fully extinguishing a fire in the cell.</p> <p>Where the developer proposes that suppression systems are not required in the design, the FRS needs to be satisfied that alternative controls are in place to prevent a fire or other thermal event in the BESS of origin, from propagating to adjacent equipment.</p>		The inclusion of a fire suppression system and the details of such a system will be decided at the procurement and detailed design stages. If a suppression system is included, its effectiveness will be demonstrated through rigorous testing. If one is not included, alternative safety mechanisms as well as large-scale fire testing will be included and discussed with the FRS. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].
		Explosion control	<p>BESS containers should be fitted with explosion protection or deflagration venting appropriate to the hazard and battery technology deployed. Designs should be developed by competent persons, with design suitability able to be evidenced. Exhaust systems designed to prevent deflagration should keep the environment below 25% of the lower explosive limit (LEL).</p> <p>Flames and materials discharged because of any venting should be directed outside to a safe</p>	N	The final BESS design will include venting systems and gas channels. Details of these systems will be provided to the FRS. Furthermore, the BESS units will undergo large-scale fire testing and/or full scale destruction testing. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].

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			<p>location and should not contribute to any further fire propagation beyond the unit involved or prevent further risk to persons. The likely path of any vented gasses or materials should be identified in emergency response plans to reduce the risk to responders.</p> <p>Likewise, the position of any venting should take account of the likelihood of weather-related ingress of water, to minimise the risk of water damage during the ordinary functioning of the BESS.</p>		
		Site access	<p>Suitable facilities for safely accessing and egressing the site should be provided. Designs should be developed in close liaison with the local FRS as specific requirements may apply due to variations in vehicles and equipment.</p> <p>In achieving adequate access for the FRS, firefighters should not have to enter the BESS site and drive through a vapour / gas cloud to reach the scene of operation. It is therefore preferable to have an alternative access point taking account of the likely wind direction.</p> <p>The principles contained within Approved Document B in support of B5 may assist in providing a proportionate and adequate provision of access and facilities for the FRS. It must, however, be acknowledged by all, the guidance referenced below is for 'common building situations' which BESS are clearly not, therefore it is cited only as potential broad principles.</p>	N	Two points of access to the BESS site have been provided, taking account of likely wind direction to prevent the need to drive through vapour clouds. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].

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		Water supply, fire risk, water storage,	<p>Pumping fire appliances in the UK typically have a water storage capacity of approximately 1,800-2,000 litres of water which can be exhausted in under five minutes per appliance. Therefore, to supplement the supply of water, the site needs to be supplied with a water supply for FRS to utilise in the event of an emergency.</p> <p>There must be enough water available for firefighting to take place and to manage a reasonable worst-case scenario. Depending on the site this could be water in storage tanks, lagoons on site, access to hydrants or mains water supply.</p> <p>The amount of water required will vary and will be dependent on a number of factors including:</p> <ul style="list-style-type: none"> • The size of the incident to be dealt with e.g. 1 x BESS unit • The principles of the emergency response plan and the expectation of the role of the FRS (firefighting strategy). • Access and facilities for firefighters on site • BESS location and proximity to infrastructure or areas of population. • The requirement to supplement any on site firefighting facility such as a dry pipe sprinkler / deluge system. 	N	Two on-site fire water reserve tanks are proposed, each with a capacity of 228,000 litres (enough to provide 1,900 litres/min for 2 hours each). The applicant will endeavour to provide a mains water supply where possible considering the local infrastructure. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].

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		Fire hydrants	<p>Fire hydrants and connections to any dry pipe systems that are required to be installed on the BESS site should installed in accordance with BS 9990 Non-automatic firefighting systems in buildings code of practice (Current Edition) and should be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition).</p> <p>Fire Hydrants provided should achieve a flow rate of no less than 25 litres / second at any hydrant on the site¹⁴. This figure is based on guidance produced by Water UK and the Local Government Association. The flow rate for transportation has been selected as the comparative value for flow rates, rather than that of a domestic housing development or an industrial setting.</p>	N	Any fire hydrants and dry pipe systems will comply with the stated standards and with the proposed flow rate requirements.
		Static water supplies, onsite suppression systems	<p>Where a hydrant flow of 25 litres / second cannot be achieved, it would be prudent to provide an equivalent static supply of water on site that will provide for the same flow rate for a duration of 120 minutes. This equates to approximately 180,000 litres of water. Consideration should be given, within the site design, to the management of water run-off (e.g. drainage systems, interceptors, bunded lagoons).</p> <p>Water supplies for any onsite suppression system will require to be sized independently for the design fire size of the BESS by a competent fire engineer.</p> <p>Any static water storage tanks designed to be used for firefighting must be located at least 10 metres</p>	N	Two on-site fire water reserve tanks are proposed, each with a capacity of 228,000 litres (enough to provide 1,900 litres/min for 2 hours each). Fire water run-off will be managed appropriately to avoid environmental damage. Tanks will be located at least 10 m from BESS units. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].

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			away from any BESS container / cabinet to allow for safe access and usage. They must be clearly marked with appropriate signage. They must be easily accessible to FRS vehicles and their siting should be considered as part of a risk assessed approach that considers potential fire development / impacts. Outlets and connections should be agreed with the local FRS. Any outlets and hard suction points should be protected from mechanical damage (e.g. through use of bollards).		
		Vegetation risk, BESS, fire risk, wildlife	<p>In addition to the risk of an incident occurring within the BESS, the site needs to be maintained to prevent a fire spreading to the BESS or indeed fire loading, by providing a 'bridge' or path between BESS units to transmit flaming or radiant heat.</p> <p>It is important that no combustible material is adjacent to BESS units and that clear access is maintained. Areas within 10 metres of BESS units should be kept clear of combustible vegetation and all other vegetation within the curtilage of the site should be kept in a condition such that it does not increase the risk of a fire on the site.</p> <p>Areas with wildfire risk or vegetation that would result in a significant size fire should be factored into the assessment. Additional separation distances should be factored in to prevent a fire spreading to the BESS or increasing the ambient temperature within the BESS above the tolerances of the safe working temperature.</p>	N	Areas within 10m of BESS enclosures do not contain combustible vegetation and would not be planted with any new combustible vegetation wherever possible. Where this is not feasible a full risk assessment would be conducted, and mitigation features applied if required by the CFRS. Any other vegetation on site would be kept in a condition such that they do not increase the risk of fire on site.

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		Provision of risk information	<p>To ensure the provision of risk information to the FRS, the site operator should develop and share an emergency response plan with the local FRS point of contact. There will be variance in the layout and design of each operator's emergency response plan, but it should contain the following broad subject areas:</p> <ul style="list-style-type: none"> • How the FRS will be alerted. • A facility description, including infrastructure details, operations, number of personnel and operating hours. • A site plan depicting key infrastructure: site access points and internal roads, firefighting facilities (water tanks, pumps, booster systems, fire hydrants, fire hose reels etc), drainage, and neighbouring properties. • Details of the emergency response co-ordinator including the subject matter expert for the site. • Safe access to and within the facility for emergency vehicles and responders, including to key site infrastructure and fire protection systems. • Details and explanation of warning systems and alarms on site and locations of alarm annunciators with alarm details (smoke, gas, temperature). • Hazards and potential risks at the facility and details of their proposed management. 	N	A comprehensive emergency response plan will be prepared and shared with the FRS as set out in the outline Battery Safety Management Plan [EN010141/DR/7.10].

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> The role of the FRS at incidents involving a fire, thermal event or fire spreading to the site. Emergency shutoff or isolator locations. 		
		Environmental impact plans, mitigation, water runoff,	<p>Suitable environmental protection measures should be provided. This should include systems for containing and managing water runoff. System capability / capacity should be based on anticipated water application rates, including the impact of water based fixed suppression systems.</p> <p>Sites located in flood zones should have details of flood protection or mitigation measures.</p>	N	The BESS scheme will integrate an external firefighting water capture drainage system. In the event of a fire a system of automatically self-actuating valves at the outfalls from the BESS areas will be closed, isolating the BESS areas drainage from the wider environment. Fire water runoff may contain particles from a fire; the runoff must be contained and tested before being allowed to discharge to the local watercourses. The water contained by the valves will be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site (if polluted) or releasing into drainage systems, if safe to do so.
		Emergency planning, sensitive receptors	<p>There must be plans to show all sensitive receptors within a 1km radius of the site that could be affected by a fire. Examples of sensitive receptors may include:</p> <ul style="list-style-type: none"> Schools, hospitals, nursing and care homes, residential areas, workplaces. Protected habitats, watercourses, groundwater, boreholes, wells and springs 	N	The BESS Fire Emissions Modelling Report (Plume Study) at Appendix A of the oBSMP [EN010141/DR/7.10]. assesses the battery fire emission impact in the five worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area.

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			<p>supplying water for human consumption – further habitat information can be found on the Defra MAGiC map website.</p> <ul style="list-style-type: none"> Roads, railways, bus stations, pylons (on or immediately adjacent to the site only), utilities, airports <p>Plans must have a compass rose showing north and the prevailing wind direction.</p>		
		Thermal event, deflagration	<ul style="list-style-type: none"> How will the proposed BESS perform in the event of a thermal event / deflagration and what proactive / reactive systems are proposed to mitigate this? How will the thermal event be contained to the BESS of origin without the radiant heat to others? How has the performance of the BESS in a thermal runaway event influenced site design? 	N	The selected BESS units will have undergone large-scale fire testing to demonstrate its performance in a thermal event/deflagration. The outcome of this testing will inform the spacing between BESS units. Mitigation systems will include Internal fuses, liquid cooling system, active thermal management system (TMS), contactor at rack/string and bank level, overcharge safety devices, internal passive protection products, venting systems and gas channels, thermal or multi-sensor monitoring devices. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].
		Site plans	<ul style="list-style-type: none"> What are the assumptions about active firefighting, within the emergency response plan and what measures are in place to reduce the scale of an incident? Are the incident assumptions realistic? What is the role of the FRS at an incident? Are they 	N	The assumption made in the outline Battery Safety Management Plan [EN010141/DR/7.10] is that CFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>realistic? What is the expectation of the FRS in terms of the fire strategy at a thermal event?</p> <ul style="list-style-type: none"> What is the provision for firefighting access to, around and within the site? 		<p>fire from spreading. This strategy will be finalised with CFRS and be clearly communicated in the an Emergency Response Plan (ERP) to ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community and to ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite. Two points have access to the site as well as 6 m wide internal access roads are proposed.</p>
		Water supply, suppression systems	<ul style="list-style-type: none"> What is the type, purpose and effect of any fire suppression system installed? What is the purpose of the water supply provision on site? Boundary cooling / defensive firefighting or active suppression? 	N	<p>Please refer to previous responses within this Table 1.8 and to the outline Battery Safety Management Plan [EN010141/DR/7.10].</p>
		BESS design	<ul style="list-style-type: none"> What is the size, quantity and capacity of each BESS unit? Is the BESS design appropriate for the weather at the proposed location i.e. prevention of water ingress and impact of temperature range on cooling systems? Does the applicant / developer have relevant competence and experience in the field of BESS design and deployment on the scale of the proposed development? 	N	<p>The final BESS system procured will be suitable for the local climate, humidity, temperature range, etc. with appropriate margin. Further detail can be found in the outline Battery Safety Management Plan [EN010141/DR/7.10].</p>

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			<ul style="list-style-type: none"> What are the arrangements for ongoing monitoring of the BESS and what is the response time for onsite technical assistance in the event of an incident? 		
		Annunciation panels	<ul style="list-style-type: none"> What remote annunciation panels are available for monitoring an event from the site? What data is available from these remote annunciation panels? 	N	An emergency response plan will be developed post planning consent to facilitate effective and safe emergency response. It will follow UK National Fire Chiefs Council (NFCC) (Ref) and NFPA 855 (Ref) guidelines and will include details and explanation of warning systems and alarms on site and locations of alarm annunciators with alarm details (smoke, gas, temperature).

Table 1.9: Canal and River Trust

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation, assets	<p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural, and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a prescribed consultee in the Nationally Significant Infrastructure Projects (NSIPs) process.</p> <p>The site area is not within close proximity to our network. The Trust can therefore confirm that we have no comments to make on the proposals. However, we do recommend that you identify and consider any waterways, including any restoration projects, that may be affected by your proposals and consult with the relevant owners/navigation authorities.</p>	N	The Applicant notes these comments.

Table 1.10: Environment Agency

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	PEIR Chapter 2, water supply	<p>2.4.141; 2.5.15 - The PEIR makes reference to Anglian Water Services (AWS) mains connection to the north of Site D and also to the use of water tankers. The location of this development is in an area of serious water stress. The water companies in this region are already unable to supply new nondomestic demands in targeted areas of East Anglia until new strategic supplies can be developed.</p> <p>We recommend that the availability of supply to any nondomestic uses be explicitly checked with the water company.</p>	N	<p>The Applicant has set out an assumption of the likely water requirements for the Scheme as part of ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2], and in the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p> <p>The Applicant has included the Pump House east of Great Staughton within the Order Limits. Following discussion with Anglian Water, this was identified as a potential point of connection from which a piped water connection could be built to serve Site D.</p>
		PEIR Chapters 2 and 8, CEMP, water supply	<p>Table 2-19; Table 2-22; Table 8.6; 8.8.20; CEMP Table 5.7:</p> <p>The PEIR states that water requirements during both the construction and operational phases will be drawn from a licenced and approved source. This is stated in response to AWS scoping response to water supply concerns during construction (see also above) and in context of the supply of fire water and washing water for the operation of the BESS.</p>	N	<p>The Applicant has set out an assumption of the likely water requirements for the Scheme as part of ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2], and in the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>The PEIR also noted the following activities which require not insignificant volumes of water during the construction phase:</p> <ul style="list-style-type: none"> • Provision of year-round clean water supply for dust suppression. • Horizontal directional drilling (requiring bentonite clay mixing and continuous supply) at 30+ sites identified in Tables 2-19 and 2-22. <p>The source of supply of water for these activities is not clear.</p> <p>We recommend a basic water supply strategy is undertaken to assess all water demands during construction and operation which evaluates the options available for sources of supply. More information can be found in the abstraction licensing strategy for the Upper and Bedford Ouse catchment.</p> <p>Anglian Water provide a Water resources assessment template which can be used to do this and should be included with the Environmental statement or as part of the CEMP.</p> <p>Leaving this assessment to the permitting process post-DCO may risk planning for potential obstacles too late to avoid delays pre-commencement and considering water supply early may expedite the permitting process later on.</p>		<p>The Applicant has included the Pump House east of Great Staughton within the Order Limits. Following discussion with Anglian Water, this was identified as a potential point of connection from which a piped water connection could be built to serve Site D.</p>

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		PEIR Chapter 2, watercourses, wildlife, habitat connectivity	<p>Multiple culverts are proposed to be constructed within the scheme as access tracks and for cable-crossings over watercourses.</p> <p>Whilst narrow culverts on the field ditches are unlikely to impact otters, the construction of culverts on larger waterbodies (such as Pertenhall Brook) may have a negative impact on the species. Culverting in general fragments habitats and reduces connectivity, making dispersal and commuting for some species difficult. Potential to negatively impact otters and water voles, fish and aquatic invertebrates.</p> <p>Clear-span bridges should be considered if watercourse crossings are required, as these maintain habitat connectivity and allow species to commute freely. We strongly encourage removal of any existing culverts to further enhance watercourses.</p> <p>Culverting should be avoided, especially pipe or box-section culverts – as currently proposed. Open span crossings are preferred. For permanent access tracks, if a bridge with set back abutments is not suitable/practicable, three sided or arched culverts of sufficient size to allow free passage of water and wildlife, which do not impact the channel bed, should be utilised.</p>	N	The Applicant has changed the design of the majority of the permanent crossings for the operational phase of the Scheme to be open span crossings, rather than culverts. Where culverts are proposed they would allow a natural substrate to form, ensuring continuation of the watercourse bed.
		Chemicals in solar panels,	The report states: "Panels will have an anti-reflective coating". The applicant does not	N	The Applicant will include the use of PFAS or 'forever chemicals' as a procurement criteria, preferencing coatings which are

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		environmental impact	<p>specify if this coating will contain PFAS or other “forever chemicals”.</p> <p>Strong preference toward coatings which are free from PFAS.</p>		free from PFAS when considered amongst other criteria.
		BESS design and spacing	<p>The indicative BESS layout, including spacings between units, is not in line with current NFCC guidance (referenced in 2.4.51): “A standard minimum spacing between units of 6 metres is suggested unless suitable design features can be introduced to reduce that spacing.”</p> <p>Using smaller spacing than recommended means there is a greater risk of a thermal runaway event, and it would be more difficult to contain a fire on the site.</p> <p>Review BESS design and ensure it is in accordance with best practice guidance.</p>	N	The design parameters for the BESS have been informed by recent experience of BESS design and by the NFCC Guidance. The Applicant has prepared an outline Battery Safety Management Plan [EN010141/DR/7.10] as part of the application and consulted with Cambridgeshire Fire and Rescue Service as part of its preparation.
		Fire risk associated with BESS, risk management, surface water contamination	<p>The retention basin associated with the BESS will have a sluice gate that can be closed during a fire to prevent contaminated water leaving the site. The applicant does not specify the mechanism by which the gate will be activated. If this is an automatic function, we would like to understand how it is triggered and what fail-safe will be in place. If the sluice needs to be closed manually at the outbreak of a fire, a clear method statement must be produced, and we need assurance that this will always be done.</p>	N	In normal operation the retention basin would allow rainwater to pass through and drain to a nearby watercourse (as set out in outline Surface Water Management Plan [EN010141/DR/7.13]), but in an emergency situation a valve could be automatically engaged to isolate the retention basin and prevent any run-off for a period of time. This would allow the run-off to be collected and treated in an appropriate way.

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			If the method for closing the sluice has not been determined, there is a high risk it will not be fit for purpose. This could lead to unacceptable risks to surface water and groundwater.		
		Decommissioning, infrastructure left on site, waste	<p>Main report 2.7.1: at decommissioning “Any infrastructure that is more than 1metre below ground level, such as cable conduit and casing, would be left in situ.” Appendix 2-5 DEMP 2.4.5: “unless legislation at the time requires otherwise”. We accept this is current standard practice, but allowance should be made for removal of all elements of the scheme if that is best practice at the time. While legislation should always be followed, works in addition to this may be required to ensure the best environmental outcomes.</p> <p>Industry best practice to be reviewed prior to decommissioning. Allowance to be made for removal of all parts of the development at decommissioning.</p> <p>Include allowance for this in the final DEMP and associated documents. The applicant has a duty to ensure nothing left in situ will cause harm to the environment, such as through longer term degradation.</p>	N	The Applicant has updated the outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] to include the commitment that decommissioning will be undertaken in accordance with standard best practice and prevalent legislation at the time.
		PEIR chapter 7, biodiversity net gain, habitats	7.2.1: Environmental legislation does not list some recent (2024) legislation pertaining to Biodiversity Net Gain (BNG).	N	The Applicant has included this legislation in the list within Section 7.2 of ES Vol 1

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			Please include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.		Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].
		SSSIs	<p>All SSSIs have been 'Scoped Out' of detailed assessment, despite Little Paxton Pits SSSI being located downstream of the scheme.</p> <p>The River Kym flows adjacent too East Park Site C, Pertenhall Brook flows through East Park Site A and the Duloe Brook and South Brook flow through the cable corridor, all of which are tributaries of the River Great Ouse. Little Paxton Pits SSSI is hydrologically linked to the scheme, therefore there is a risk of pollution to the site during the Construction Stage.</p> <p>We recommend the 'Scoping In' of Little Paxton Pits SSSI, and that the applicant liaises with NE to determine potential impacts.</p>	N	<p>The scope of the assessment on SSSIs was discussed and agreed with Natural England.</p> <p>The mitigation measures adopted in the outline Construction Environmental Management Plan [EN010141/DR/7.3] and the outline Surface Water Management Plan [EN010141/DR/7.13] would ensure there is no potential for likely significant effects on the Little Paxton Pits SSSI.</p>
		Wildlife surveys	<p>Riparian Mammal (otter and water vole) surveys have not yet been undertaken. The lack of surveying of riparian mammals (prior to the PEIR) is disappointing. We do not have the opportunity to comment on results and recommendations, therefore the applicant will not benefit from technical input.</p> <p>Ideally, the riparian mammal surveys would have been completed prior to the PEIR. However, we'd recommend that riparian mammal surveys</p>	Y	Targeted water vole and otter surveys have been completed. Further, suitable protection measures are included within the oCEMP [EN010141/DR/7.3] including pre-construction surveys of suitable aquatic and terrestrial habitats.

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			are completed in advance of the Draft DCO submission, to allow the applicant enough time to adequately plan mitigation and enhancements in the oCEMP and oLEMP.		
		Watercourses, biodiversity net gain	<p>7.7.9: There is a lack of ambition with regards to enhancing the watercourses within the site boundary, bearing in mind the scale of the project. Similarly, considering that some of the rivers and their tributaries (e.g. River Kym and Pertenhall Brook) are re-profiled and classified as ‘heavily modified’, the project could improve the Water Framework Directive (WFD) classification of these watercourses.</p> <p>Recommend that the applicant includes in-channel and riparian habitat enhancements measures. This could be achieved through increasing the in-channel habitat diversity, improving channel morphology and removing barriers.</p>	N	<p>The Scheme design includes riparian enhancements alongside river banks, and would involve creating areas of grassland alongside watercourses as opposed to the existing arable farmland habitats, which are seasonally exposed bare soils.</p> <p>The Design Approach Document [EN010141/DR/5.6] sets out that a design principle of the Scheme is to provide enhancement of bankside vegetation. This design principle is secured by the Design Parameters and Principles Statement [EN010141/DR/7.1].</p> <p>The Applicant has prepared ES Vol 2 Appendix 8-2: WFD Assessment [EN010141/DR/6.2].</p>
		Consultation materials, PEIR Chapter 7	7.6.84: Typographical error “the embedded design includes <i>otters</i> of at least 8 metres from all watercourses and ditches”. Change “otters” to “buffers”.	Y	Amended in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] .
		Source Protection Zones, aquifers,	The list of receptors in 8.3.6 doesn't mention Source Protection Zones (SPZ). In 8.3.14	Y	List not intended to be exhaustive, however SPZs now added to example list of

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		sensitive receptors	<p>Table 8.4, secondary aquifers should be acknowledged. Currently only principal aquifers are mentioned. Inclusion of all receptors at this stage is important for completeness and the avoidance of doubt.</p> <p>Superficial secondary aquifers may support regional river recharge, especially as the Oxford Clay prevents downward migration. As such these should be considered.</p> <p>Failure to define all sensitive receptors may lead to some being overlooked. We do not have full confidence that all risks have been considered. The site is not in a SPZ, so the risk is negligible here, but 8.3.6 should look beyond just matters on this site.</p> <p>Ensure all receptors are considered in future assessments, even if it is to scope them out at an early stage.</p>		hydrological receptors in ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1] . Secondary aquifers are mentioned in receptor sensitivity table.
		Flood risk assessment, PEIR chapter 8	<p>With regards to the impact magnitude as described within table 8.4 changes in peak flood levels of less than or equal to 10 millimetres are described as negligible. Please note that the classification presented within this table is slightly at odds with the National Planning Policy Framework which details that there should be no increases to flood risk elsewhere because of new development.</p> <p>Impacts to third parties could potentially be overlooked if a blanket 10-millimetre threshold is</p>	N	Noted and clarification acknowledged. The reference to 10mm is based on the normally accepted modelling tolerance and in the context of an Environmental Impact Assessment is a measure of the significance of potential impact (not the residual effect). Agreed that any impact on flood risk will need to be reviewed on a case by case basis in the context of NPPF for the FRA appendix.

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			<p>classified as negligible. The spatial extent of any increases or reductions in flood risk is also an important consideration not just the magnitude.</p> <p>Any impact on flood risk will need to be reviewed on a case by-case basis as the spatial extent of any increase is also an important consideration, not just the magnitude of any increase in peak water levels. Furthermore, considerations around modelling precision may also influence what is classed as an observable increase or impact versus what might be attributable to modelling precision limitations and instability. There is a section on the impacts on off-site flood risk within the guidance on undertaking modelling for flood risk assessments which should be consulted and provides some useful considerations. This is available online at Using modelling for flood risk assessments - GOV.UK (www.gov.uk).</p>		
		Flood level data, fluvial flooding,	<p>8.4.5: This section notes that it is assumed that flood level data associated with fluvial flooding from the Duloe Brook and River Kym is sufficient to form an assessment to this site and a qualitative assessment of third-party flooding impacts. Please note, these watercourses were modelled as part of the Lower Great Ouse Flood Risk Mapping Study (Mott Macdonald, 2015). This modelling is old and updates to climate change allowances and other datasets may mean that the representation of flood risk is not representative of current conditions.</p>	N	<p>All infrastructure has been sited outside of the present day fluvial flood zones for development planning, i.e. present day scenarios.</p> <p>Some solar panelling has been sited within fluvial extents at risk under future climate change scenarios for the extreme (0.1%AEP) event. However, these are extreme extents under extreme climate scenarios. The flood risk due to the development, even under climate change,</p>

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			<p>Furthermore, where infrastructure is placed in areas of flood risk associated with these watercourses a qualitative assessment of flood risk to confirm third party impacts would not be suitable. We would expect a quantitative assessment so that appropriate mitigation measures can be implemented where impacts to third parties are identified.</p> <p>If you are placing infrastructure within the flood extents for these watercourses it is important to note the following limitations with the existing Environment Agency hydraulic modelling. Firstly, these models use now superseded climate change allowances. The hydrological boundary conditions applied to these models are also quite old and it would be prudent to check that the flows are still representative. Furthermore, more recent Lidar Digital Terrain Model (DTM) data is available for this area. Please review any modelling data that you use to ensure that it adequately represents current and future baseline conditions for the development area. Please refer to Using modelling for flood risk assessments - GOV.UK for further guidance. With regards to the assessment of third-party impacts, where infrastructure falls within areas of flood risk the impacts associated with this should be quantified using hydraulic modelling. It is recommended that modelling methodologies are agreed with the Environment Agency prior to undertaking any detailed modelling work.</p>		would still remain the same due to the nature of the solar panel construction.

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		Flood risk assessment, flood mitigation	<p>Table 8.6, PEIR Chapter 8: This issue, raised within the scoping phase, requires an assessment of flood risk over the 40-year lifespan of the development. Action taken refers to the assessment within the FRA, however this does not currently include suitable assessment of climate change.</p> <p>Absence of this results in an incomplete Flood Risk Assessment and potentially insufficient flood mitigation.</p> <p>It is noted that development has been sited outside of Flood Zones 2 and 3, however the FRA and design flood event should include an allowance for climate change to cover the proposed development lifespan. The FRA and ES chapter should confirm this has been applied and that the development layout, taking account of mitigation measures, remains appropriate in terms of flood risk.</p>	N	Climate change mapping has been reviewed within ES Vol 2 Appendix 8-1: FRA [EN010141/DR/6.2] according to the 2080s epoch, which is considered to be appropriate for the design life of the scheme. No significant infrastructure apart from panelling is within these extents (panelling only for the most extreme 0.1% AEP event and even then, there is no change in flood risk due to panel construction). The BESS (only essential infrastructure) is located over 1km from the 0.1% AEP CC extent, therefore considered not to be at risk during its lifetime.
		Groundwater, mitigation	<p>Statement that “no significant groundwater aquifers are present at the Site” is misleading as it only applies to bedrock geology. Large areas of superficial geology underlying the site are secondary A aquifer, which can support local water supplies, and may form an important source of base flow to rivers.</p> <p>Failure to identify aquifers can lead to insufficient consideration of the risks, and inadequate mitigation put in place to protect them.</p>	Y	Descriptions updated accordingly and the superficial drift aquifers have been assessed within ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1] .

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			Review hydrogeological descriptions and ensure that full information is given as necessary.		
		Watercourse buffer zones, wildlife movement	<p>8.7.4: Buffer strips of an inappropriate width are not effective at protecting the watercourse from sediments, enabling bank stabilisation through vegetation establishment and allowing space for commuting by mammals.</p> <p>We recommend that riparian buffer strips measure a minimum of 10m from the top of the riverbank to the development for all watercourses on the site, unless existing physical constraints prevent this.</p>	Y	A 10m buffer has been incorporated, as set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Watercourse crossings	<p>8.7.7 Design of Watercourse Crossings: This section notes that a watercourse crossings assessment will be undertaken. The cross-sectional area of crossings will be sized according to appropriately modelled storm flows for the upstream catchments. This is welcomed.</p> <p>New or replacement watercourse crossings have the potential to change and impact flood flows and therefore impact the extent and depths of flood events. All crossings should be carefully designed and their impacts assessed within the Flood Risk Assessment. Note that on Main River watercourses we would oppose any new sections of culverts, and would require crossings over to be clear span with a soffit level above the design flood level. Any such works would require</p>	Y	<p>Noted. A watercourse crossing assessment has been undertaken in ES Vol 2 Appendix 8-3 [EN010141/DR/6.2].</p> <p>The Applicant has changed the design of the majority of the permanent crossings for the operational phase of the Scheme to be open span crossings, rather than culverts. Where culverts are proposed they would allow a natural substrate to form, ensuring continuation of the watercourse bed.</p>

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			<p>a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016.</p> <p>Please note we would recommend against culverts for any crossings and would prefer the use of open-span structures such as bridges. Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level.</p>		
		Outline Surface Water Management Plan, watercourse crossing design	<p>Watercourse crossing design – “The bed profile would remain unchanged to prevent a change in geomorphology at each crossing point.” This statement is at odds with the use of what appear to be pipe culverts as per design drawings, although table 8.9 (and app. 8.2) mentions the use of arched culverts – this causes some confusion.</p> <p>Redraw designs and ensure that watercourse crossing choices are correctly specified within the text, i.e. bottomless arched culverts (as stated in App. 8.2) that do not interfere with the channel bed are being utilised.</p>	Y	<p>Noted. A watercourse crossing assessment has been undertaken in ES Vol 2 Appendix 8-3 [EN010141/DR/6.2].</p> <p>The Applicant has changed the design of the majority of the permanent crossings for the operational phase of the Scheme to be open span crossings, rather than culverts. Where culverts are proposed they would allow a natural substrate to form, ensuring continuation of the watercourse bed.</p> <p>The design and location of watercourse crossings is set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p>
		Preliminary flood risk assessment, climate change	<p>The Preliminary Flood Risk Assessment does not describe the impacts of climate change on flood risk.</p> <p>For clarity given the development would be classed as Essential Infrastructure and has an</p>	N	<p>Climate change mapping has been reviewed within ES Vol 2 Appendix 8-1: FRA [EN010141/DR/6.2] according to the 2080s epoch, which is considered to be appropriate for the design life of the scheme. No significant infrastructure apart</p>

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			indicative operational lifespan of 20 to 40 years the Higher Central climate change allowance should be used as the fluvial design event with a consideration also of an upper climate change allowance as a sensitivity test.		from panelling is within these extents (panelling only for the most extreme 0.1% AEP event and even then, there is no change in flood risk due to panel construction). The BESS (only essential infrastructure) is located over 1km from the 0.1% AEP CC extent, therefore considered not to be at risk during its lifetime.
		Preliminary flood risk assessment, flood levels, flood modelling, mitigation, design, panel placement	<p>Paragraph 3.3.3: Flood levels for the 0.1% AEP event are provided here for the Pertenhall Brook and the River Kym. These appear to have been derived from the Flood Zone 2 flood map outline. These levels to not reflect suitable data to inform the flood risk assessment.</p> <p>The use of Flood Zone 2 and 3 for the detailed assessment of flood risk does not include suitable climate change allowance, and may therefore underrepresent the risk to the site.</p> <p>Flood modelling of the Lower Ouse River Kym catchment id referred to in Paragraph 3.3.4 and this data should be used in the detailed assessment of flood risk. Climate change allowances from this modelling should be presented within the FRA to establish the design flood event. The design flood event should be the 1% AEP plus the appropriate climate change uplift in fluvial flows.</p> <p>3.4.2: There may be areas of the site where the proposed 800mm ground clearance is</p>	Y	Upper River Kym model obtained from the EA and modelled levels extracted. Climate change mapping is presented also within ES Vol 2 Appendix 8-1: FRA [EN010141/DR/6.2] .

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			<p>insufficient flood mitigation, and these panels remain at risk during the design flood event. An updated assessment of flood risk by review of the modelling of the River Kym will confirm the design flood level. Panel ground clearance should then be checked to be suitable flood mitigation.</p> <p>Appendix 8-1 Section 4.2.1 p.14: Where infrastructure is placed in areas of flood risk associated with ordinary watercourses it should be designed appropriately so that it is resilient in the design flood including the impact of climate change. The impact of any infrastructure on flood risk should be quantified and where required mitigated for.</p>		
		Preliminary flood risk assessment, climate change	<p>Paragraph 3.3.4: Reference is made to available modelling of the River Kym however no reference is made to climate change data, or to the proposed design life of the development.</p> <p>The design life of the proposed development will inform the appropriate climate change allowances to be assessed within the FRA.</p> <p>Confirmation of the design life of the development will allow confirmation of the climate change allowances to be included within the FRA. The design flood event must include suitable climate change data. For development classed as essential infrastructure, then from a fluvial flood risk perspective the higher central climate change allowance should be used (70th</p>	Y	<p>Upper River Kym model obtained from the EA and modelled levels extracted. Climate change mapping is presented also within ES Vol 2 Appendix 8-1: FRA [EN010141/DR/6.2].</p> <p>Essential infrastructure has been sited outside of any areas at fluvial risk (including climate change allowances).</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile) should also be completed. The design life of the development should conclude once the site has been fully decommissioned.		
		Surface water flood risk assessment	<p>The Preliminary Flood Risk Assessment references the pluvial flood map and associated water depths from this product. Please be aware, the Risk of Flooding from Surface Water dataset has recently been updated.</p> <p>The assessment of flood risk could be inaccurate due to the publication of the updated Risk of Flooding from Surface Water (RoFSW) dataset in January 2025.</p> <p>Please refer to the updated Risk of Flooding from Surface Water dataset within future versions of the Flood Risk Assessment.</p>	Y	ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2] has been updated with the new surface water flood risk mapping data.
		Pluvial flooding, BESS location	<p>It is understood that there are currently two potential locations for the BESS. However, both locations are potentially at risk of pluvial flooding.</p> <p>The BESS represents critical infrastructure and would be the most vulnerable element of the site to flooding. Application of a Sequential Approach to the site layout should ensure that the BESS is located within an area of the site at lowest risk. Paragraph 3.4.4 refers to perimeter bunding of</p>	N	The BESS is confirmed as located within an area with minor encroachments of surface water flooding. This has been discussed with CCC and it was agreed no modelling required since this is at the top of the surface water catchment (no incoming flows to the compound area). Incidental rainfall will be dealt with in accordance with the oSWMP [EN010141/DR/7.13] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			the BESS compound. The FRA should provide full detail of this and assess the impact on fluvial or pluvial flood flows.		
		PEIR Chapter 12 Ground conditions, groundwater, below ground infrastructure, geology	In 12.6.18, BGS borehole logs within the site boundary are discussed, but those within the surrounding area are ignored with no explanation as geology can be expected to be similar.	N	BGS boreholes have been reviewed and are included in ES Vol 2 Appendix 12-1 [EN010141/DR/6.2] . Boreholes greater than 1.5km away from the Order Limits have not been included as SGP do not consider these representative of the ground conditions present within the Order Limits.
			In 12.8.13, it states “perched water is not expected”, but no explanation or source is given for this.	N	The Applicant has reviewed surrounding BGS borehole records for groundwater information and summarised this in Sections 12.6.19 to 12.6.21 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] and within ES Vol 2 Appendix 12-1 [EN010141/DR/6.2] . It was concluded that shallow groundwater may be encountered. A geotechnical investigation has been recommended to inform design proposals which will include information on groundwater strikes / groundwater ingress. Further proposed works are included within embedded mitigation during the construction and decommissioning phases at Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] .

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			In 12.8.43 it states: "Where below ground infrastructure is to be decommissioned and removed, groundwater management and dewatering practices would be adopted where groundwater is encountered". If this is a risk for decommissioning, we assume it may also be a risk for construction, but a similar statement isn't given in the relevant section.	Y	This has been added to the embedded mitigation for the construction phase at Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] .
			Nearby boreholes are discussed in Appendix 121, and geological descriptions are summarised. There is, however, no mention of shallow groundwater in the review (either the presence or absence).	Y	The Applicant has reviewed surrounding BGS borehole records for groundwater information and summarised this in Sections 12.6.19 to 12.6.21 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] and within ES Vol 2 Appendix 12-1 [EN010141/DR/6.2] . It was concluded that shallow groundwater may be encountered. A geotechnical investigation has been recommended to inform design proposals which will include information on groundwater strikes / groundwater ingress. Further proposed works are included within embedded mitigation during the construction and decommissioning phases at Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] .

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			<p>Dewatering is given only passing reference in Appendix 2-3 oCEMP and Appendix 8-2 oSWMP.</p> <p>The presence of shallow groundwater can have a significant impact on construction and design, including the size and viability of SuDS. We have not seen sufficient commentary about groundwater, either its presence or absence, to be reassured that it has been adequately considered.</p> <p>A permit may be required for dewatering activities. Not considering shallow groundwater at this stage could cause delays to construction.</p> <p>Review historical borehole logs for information about shallow groundwater. If there is insufficient information, a site investigation may be required. This might include longer-term monitoring to identify seasonal changes. Review design of SuDS once this information is available to ensure scale and position is suitable.</p>	Y	<p>The Applicant has reviewed surrounding BGS borehole records for groundwater information and summarised this in Sections 12.6.19 to 12.6.21 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] and within ES Vol 2 Appendix 12-1 [EN010141/DR/6.2]. It was concluded that shallow groundwater may be encountered. A geotechnical investigation has been recommended to inform design proposals which will include information on groundwater strikes / groundwater ingress. Further proposed works are included within embedded mitigation during the construction and decommissioning phases at Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p>
		Consultation materials, PEIR	<p>12.6.21 Table 12.10, 12.8.13, and 12.8.14, Appendix 12-1: The aquifer designations for Glaciofluvial Deposits and Oadby Member are incorrect. Within Appendix 12-1, the “Hydrogeology/ Groundwater” descriptions in tables 5.3, 6.3 and 7.3 all have errors or omissions.</p> <p>The issue doesn’t have a significant effect on the characterisation or conclusions, but it causes us</p>	Y	<p>These errors have been corrected in ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p>

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			<p>concern about the quality and reliability of other matters within the report.</p> <p>Consider additional quality assurance of reports, to ensure data presented are accurate and complete.</p> <p>12.7.1, 12.7.2 and 12.7.3: Statements that the CEMP, OEMP and DEMP “will be insubstantial accordance with” the oCEMP, oOEMP and oDEMP. We assume that this is a typographical error, and “in substantial” should be two words. The error gives the sentence a very different meaning. Typographical errors can lead to confusion or approval of matters which are unacceptable or unachievable.</p>		
		Land use and soils, soil management, waste soil	<p>Regarding soil management, it states: “It is assumed that, as the Scheme is not permanent, all soil resources will be retained on site and not exported for reuse elsewhere.” However, in 12.7.1 it states: “appropriate re-use or sentencing for off-site treatment or disposal at a suitably licensed facility.</p> <p>These statements are not in full agreement with each other. Failure to consider the requirement for removal of soil can lead to delays and unexpected costs. Removal of soil, or reuse of waste soil within the site, may be subject to permitting requirements. Failure to obtain the necessary permissions prior to works commencing can lead to legal action.</p>	Y	The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] that sets out how soils will be managed across the relevant phases of the project. This also sets out the process that will be adopted to re-using soil materials on Site.

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			Identify the requirement for soil reuse and disposal. We recommend reference to CL:AIRE Definition of Waste: Code of Practice (DoW:CoP). We note that this is mentioned in Appendix 2-3 dCEMP, 5.1.1 Table 5.12. Consider what permits and permissions may be required and liaise with the Environment 14 Agency's National Permitting Service early to agree any necessary actions.		
		Outline Construction Environmental Management Plan	<p>4.1.20 and 5.1.1 Table 5.8: It states "Should any unforeseen gross or widespread contamination be encountered on site then an appropriately qualified contaminated land specialist should be contacted immediately". We don't feel this is sufficiently covers the measures that should be taken.</p> <p>We would like the CEMP to specify that all works within the identifiable bounds of the affected area should also cease until after all investigations and remediation, if required, is complete. And remedial work ("required actions") must be agreed with LPA and EA prior to being carried out. Said works must be signed off by LPA and EA prior to re-commencement of construction works. We will likely request this as a planning requirement.</p>	Y	The Applicant has updated the outline Construction Environmental Management Plan [EN010141/DR/7.3] to address this comment.
		Outline Construction Environmental	In each case, it specifies that fuel, oil or solvents will be "stored within bunded areas". We agree	Y	The Applicant has updated the outline Construction Environmental

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		Management Plan, Outline Operational Environmental Management Plan, Outline Decommissioning Environmental Management Plan, bunds, leakage risk	<p>with this, but do not feel there is enough detail, for example on the size of the bunds.</p> <p>Bunds of insufficient size will not contain substances in the case of leakage.</p> <p>Request that all bunds are designed with at least 110% of container capacity in line with HSE guidance.</p>		<p>Management Plan [EN010141/DR/7.3] to address this comment.</p> <p>The design detail of bunds cannot be provided until the detailed design stage.</p>
		Outline Operational Environmental Management Plan, Outline Decommissioning Environmental Management	<p>The first row of the table in Appendix 2-4 references 4.1.23 of the same report relating to unexpected contamination during the construction phase. The first row of the table in Appendix 2-5 references 4.1.20 of the same report relating to unexpected contamination during decommissioning. Appendix 2-4 is for the operational phase, so construction matters do not apply. In both cases, the cited section discusses a pollution incident and not unexpected contamination.</p> <p>In both cases, reference is made to information that is not given. Either text is missing or these rows have been added erroneously. This is confusing and made lead site workers to not know what is expected of them.</p> <p>This row needs to be checked in both documents. A procedure for unexpected</p>	Y	<p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] have been updated accordingly.</p> <p>The environmental management plans commit to the production of an unexpected contamination protocol that covers each relevant phase of the project.</p>

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			contamination needs to be given if applicant feels it applicable.		
		Appendix 2-3 oCEMP 7.2.4, Appendix 2-4 oOEMP 7.2.4, Appendix 2-5 oDEMP 7.2.4	<p>In each case, it states: "A full review of the [report] will be undertaken at regular interviews and as required to respond to specific issues that may arise". It is not clear who will be interviewed, or what measure will be used to trigger these.</p> <p>We are unsure what is being committed to here, and the developer may struggle to comply with the actions.</p> <p>Provide further explanation in the final versions of these documents.</p>	Y	The outline Construction Environmental Management Plan [EN010141/DR/7.3] , outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] have been updated accordingly to set out the management and monitoring requirements.
		Outline Landscape and Ecological Management Plan, INNS management, biosecurity, wildlife	<p>5.3.1: No mention of INNS management or biosecurity measures, despite the presence of multiple INNS (riparian and terrestrial) within 2km of the scheme.</p> <p>Lack of appropriate INNS control and biosecurity risks the spread of INNS within the scheme boundary, which is an offence under The Wildlife and Countryside Act 1981 (as amended) and The Invasive Alien Species (Amendment (EU Exit)) Regulations 2019.</p> <p>I'd recommend that an INNS management plan is included as part of the Environment Statement. A pathway specific risk assessment should be considered, identifying any pathways</p>	N	The outline Construction Environmental Management Plan [EN010141/DR/7.3] , outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] , and outline Landscape and Ecological Management Plan [EN010141/DR/7.7] have been updated to include commitments to preparing an INNS Management Plan prior to the relevant phases of the project.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			for spread during construction, operation and decommissioning. I'd also recommend that a strict and robust Biosecurity Plan is included within the Environment Statement. I'd advise that all measures are also outlined within the oCEMP, oLEMP and oOEMP.		
		Great Crested Newts, buffers, pond surveys, bats, wildlife impacts, habitat impacts	<p>Great Crested Newts - we note that Pond P39 is within the boundary and P9 is on the outskirts, these were not checked for Great Crested Newts (GCN) due to inaccessibility.</p> <p>If (GCN) are present they have not been accounted for. We recommend that buffers are placed around the ponds to prevent harm and/or alternative survey methods (dogs).</p> <p>We agree that buffers should be put in for the waterbodies and hedges, but the woodland areas have not been accounted for. These are equally important foraging and commuting features.</p> <p>Bats may be impacted by the addition of solar panels. Please add a buffer onto the woodland areas to ensure that they are accounted for.</p> <p>Infrastructure such as inverters, maintenance compounds and battery storage systems should be built away from any valuable foraging habitat/known roosts.</p> <p>Badger and Mammal gates are not visible on map. There are mentions of them in the chapter and on the map, but we are struggling to locate</p>	N	<p>All ponds within the Site have been subject to survey during 2025. Access was not available to third party land outside of the Site and as such not all ponds up to 250m could be surveyed. Desk study information has been utilised alongside a precautionary approach to inform the assessment.</p> <p>Buffers to elements are set out within the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] and also secured by the Works Plan [EN010141/DR/2.3].</p> <p>The location of mammal gates are not shown on ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3] as they would be identified at detailed design. This is set out in the design parameters within ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			them on the masterplan. Please make them bold or clearer.		

Table 1.11: Essex County Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation, assets	The NSIP Team here at ECC have looked at your proposal. The impact of the scheme is significant for the Local Authorities who would host the development, should consent be ultimately given. However, due to the geographical distance between the proposal and Essex, as well as being mindful of workloads and the number of NSIP applications Essex is currently hosting, we do not wish to make comments on the scheme at this time.	N	The Applicant notes these comments.

Table 1.12: Forestry Commission

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Woodland, biodiversity, tree and hedgerow retention, green lanes, environmental mitigation	<p>We note there are some small fragmented mixed deciduous woodlands adjacent to the perimeters of the proposed sites, with one – New Wood being within Site C, close to one of the proposed sites for the substation and battery storage area.</p> <p>These mixed deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).</p> <p>They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.</p> <p>We do however note the plans for the retention of all trees and woodland within the site, with the creation of green lanes, hedgerows/hedgerow trees and new woodland planting across all of the proposed sites. The planned natural environment improvement corridors and new woodland planting appear to link the existing woodlands with the wider landscape for better habitat connectivity. Also that long term woodland management will be undertaken for both the new and existing woodland, which will benefit all of the woodland on site.</p>	Y	<p>The Applicant notes these comments.</p> <p>The Applicant has prepared ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] which provides an assessment of the Scheme on trees, hedgerows, and woodland.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Cable corridor, ancient woodland, conservation, mitigation, buffer zones	<p>We also note that the underground cable corridor from Site D to the Eaton Socon Substation appears to run adjacent to Huntingdon Wood ancient semi natural woodland.</p> <p>Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).</p> <p>Section 5.4.32 of the Overarching National Policy Statement for Energy (EN-1) states:</p> <p>“Applicants should include measures to mitigate fully the direct or indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases”</p> <p>We also particularly refer you to further technical information set out in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England.</p> <p>The Standing Advice also states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland.</p>	Y	<p>The Applicant notes these comments.</p> <p>The Applicant has prepared ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] which provides an assessment of the Scheme on trees, hedgerows, and woodland.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Root Protection Zone, mitigation, soil compaction, soil contamination, fencing, construction	The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals). We would recommend that construction exclusion zones, with appropriate fencing, are set up for any woodland within or immediately adjacent to the site during construction, to avoid any unintended incursions into the root protection zones.	Y	The Applicant has prepared ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] which provides an assessment of the Scheme on trees, hedgerows, and woodland.

Table 1.13: Great Staughton Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Land use, location of panels, loss of farmland	<p>The solar farm is to be sited on North facing slopes which makes the area to be covered to generate the electricity to be significantly greater than would be necessary if the solar farm were placed on South facing slopes.</p> <p>This inefficient use of land exacerbates the loss of farmland and extends the areas of natural beauty affected by the solar farm. These proposals in particular use more farmland than is recommended in such schemes. Over 95% of the land being utilised in the Great Staughton Parish is agricultural land with all of this being grade 3b or better. 75% of the East Park site and almost 80% of the agricultural land (excluding tracks and woodland etc) is best and most versatile land.</p>	N	<p>As set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The gradients proposed for solar development across the Scheme are suitable for development without shading impacts, and the Scheme remains an efficient use of land.</p>
		Alternative locations, alternative renewable energy	It was felt not enough had been done to explore better alternative locations for solar panels both nationally and in the vicinity of the Eaton Socon Sub-station.	N	In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> Industrial and infrastructure sites e.g. car parks Potential new housing developments in the area <p>It was felt not enough has been done to establish whether alternatives such as wind power would be better in this area.</p>		<p>However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own. This is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2].</p> <p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.</p>
		Loss of countryside, impact on areas of natural beauty, visual impact,	The solar panels will seriously diminish the beautiful views of Great Staughton obtained from footpath 23 and 24 along the crest of the Moor overlooking the village of Great Staughton including important views of the Church, Manor and the ancient area along The Town. This impact has been made worse by the inclusion of	N	The Applicant has provided a comprehensive assessment of the visual impact of the Scheme within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] . This includes viewpoints and accurate

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		impact on heritage assets	<p>the new additional field of solar panels. The importance to the village of these views is identified in the Neighbourhood Plan for Great Staughton.</p> <p>The whole area from Hail Weston through Great Staughton to Little Staughton and Pertenhall will have views of the hillside destroyed by the solar panels.</p>		<p>visualisations from along the ridge to the south of Great Staughton.</p> <p>The Applicant has considered the viewpoints in the Great Staughton Neighbourhood Plan in selecting viewpoints for the Landscape and Visual assessment.</p>
		Impact on bridleways	Bridleway 7 to Hail Weston from Great Staughton would be completely bordered by solar panels.	N	The Applicant notes this comment. The Scheme design includes buffers of 10m either side of public rights of way to create 20m wide corridors in which public rights of way will pass through the Scheme.
		Size and scale, wildlife, environment, biodiversity	<p>It is feared that size of such a solar development will impact adversely natural inhabitants of the countryside, the birdlife, and animal life.</p> <p>The aspect of pond life and its protection needs careful consideration in the scheme.</p>	N	<p>The Applicant has undertaken an assessment of the potential impacts of the Scheme on wildlife through ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. This assessment concludes that the Scheme would not result in any significant adverse effects upon ecological receptors.</p> <p>Whilst short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage and otters is predicted during the construction phase, during the</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					operational phase the Scheme is expected to result in a significant beneficial effect on priority habitats and on foraging and commuting bats, along with beneficial (not significant) effects for other ecological receptors.
		Safety, BESS, screening and mitigation	The issue of safety of the battery storage was raised together with the ability of emergency services to access the storage quickly in an emergency. With regard to the alternative suggestions for the siting of the battery storage it was felt putting it in Area D was slightly less intrusive to the landscape. Its location must be properly screened on all sides to mitigate the impact.	Y	<p>Following the 2024 statutory consultation, the Applicant has confirmed its intention to locate the battery energy storage system and internal substation at a location within Site D (referred to as Option 2 in pre-application consultation materials).</p> <p>The Applicant has prepared an outline Battery Safety Management Plan [EN010141/DR/7.10] that sets out the proposed access arrangements in the unlikely event of an incident on site.</p>
		Flood risk, water run off	The areas where the River Kym crosses the C road near Great Staughton Church and where it crosses the B645 at the Eastern end of the village are regularly flooded. The impact of quicker run off from solar panels into the river Kym would only aggravate flooding in the area.	N	<p>The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]. This concludes that the Scheme will not increase flood risk off-site in any way.</p> <p>The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how surface water and the Scheme</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					drainage will be managed throughout construction, operation and decommissioning.
		Noise, construction	The issue of noise from the solar panels and any construction process would affect the quality of life of the community.	N	The Applicant has carefully considered the noise impact of the proposals through Chapter 10 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] . This chapter identifies that the effect of noise and vibration due to construction, operational or decommissioning activity or road traffic would range from neutral to minor. Following implementation of the embedded mitigation measures planned as part of the Scheme, there would be no significant noise or vibration impacts during construction, operation or decommissioning, with residual impact magnitude considered to negligible to slight.
		Site access, impact on local roads, traffic, construction	The whole area around the proposed solar farm is of a rural aspect with undeveloped road structures. Whilst it is accepted that there are proposals to build additional access roads, the significant additional construction and workforce traffic will have a major impact on the area. Under construction the workforce is expected to rise to	N	The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			800 which is greater than the population of Great Staughton. The vehicle movements along poor B and C roads where there have been many fatalities can only be a serious risk to the local community. The community would want specific monitoring of movements particularly during the construction phase but also in any operational phase.		<p>traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>As a result of the measures outlined above and in the application, ES Vol 1 Chapter 9: Traffic and Transport concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>The Applicant has prepared an outline Construction Traffic Management Plan [EN010141/DR/7.4] which set out steps it would take to manage access to/from the construction working area, including monitoring of vehicle movements to and from the working area.</p>
		Historic buildings and conservation areas	The Great Staughton Neighbourhood Plan notes the importance of the character of the area. The solar panels will encroach significantly towards	N	An assessment of the Scheme against cultural heritage assets including the grade I, II* and II listed buildings within

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			the historic grade 1 and 2 listed buildings in the village and the designated conservation areas.		Great Staughton is included in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] , and supported by ES Vol 2 Appendix 6-4: Settings Impact Assessment [EN010141/DR/6.2] . The assessments conclude there would be no significant residual effects (in EIA terms) on the setting of listed buildings at Great Staughton.
		Cumulative impact with other solar sites	There are many other solar sites in the area, this needs to be considered in respect of the clustering of sites.	N	The Applicant has assessed the impact of the Scheme alongside existing developments in the area within the Environmental Statement [EN010141/DR/6.1] , and emerging developments within ES Vol 1 Chapter 17: Cumulative and Intra Project Effects [EN010141/DR/6.1] . This assessment concludes there would be no significant cumulative effects with other emerging developments in the locality.
		Decommissioning, life span of proposed development	There were considerable doubts raised as to whether after 40 years of solar panels the site could be restored to efficient agricultural use. The project has a life span of 40+ years with a need for decommissioning at its closure. It is felt that any developer should be required to provide	N	The Applicant's approach to decommissioning includes returning the land that forms the Scheme to a condition suitable for return to its original use after decommissioning, with the exception of areas of planting (woodland and hedgerows) that would

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			under escrow adequate resources to restore the area its original state.		be retained post-decommissioning. The requirement of a decommissioning bond or some other assurance may arise during the planning process, although at this time the Applicant considers the legal requirements within the draft DCO [EN010141/DR/3.1] to be sufficient.

Table 1.14: GTC, Independent and Quadrant Pipelines

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Assets	<p>It would appear that GTC does not have any assets in the vicinity.</p> <p>Please take this as a confirmation that GTC has no assets within the order limits of this search area and therefore no objections to your clients' proposals.</p>	N	The Applicant notes these comments.

Table 1.15: Hail Weston Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Community benefit initiatives	The East Park Scheme will generate enough power for approximately 108,000 homes, surely there is a way to provide local, sustainable, secure, and economic energy to the villages that will be impacted by these schemes, thus supporting our transition to a low carbon future, rather than allowing all the energy generated to be supplied to the National Grid. Local communities benefitting from local renewable schemes would be a sustainable and resilient solution. In addition, it would help gain community support and build resilience in rural communities that are limited by insufficient infrastructure and funds.	N	As the Scheme will connect directly into the electricity transmission network, it is not possible for local residents to benefit directly from the power generated by it. This is because the power will be moved around the network to suit demand. However, residents will benefit from the long-term benefits that will arise as part of the Scheme, including increased energy security as a result of reduced reliance on imported oil and gas from overseas. In addition to the above, the Applicant has set out that it will deliver a Legacy Fund, providing financial contributions to local projects that will help ensure local communities benefit from the operation of the Scheme.
		Regarding the Scoping Report, Hail Weston Parish Council requests that the following are formally 'scoped in':	Glint and glare during operation	N	An assessment is provided at ES Vol 2 Appendix 5-6: Glint and Glare Assessment [EN010141/DR/6.2] .
			Nighttime effects throughout the project	N	An assessment is provided as part of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] .
			Residential visual amenity throughout the project	N	An assessment is provided as part of ES Vol 1 Chapter 5: Landscape and Visual

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					[EN010141/DR/6.1], as well as ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2].
			<p>Non-statutory designated sites for nature conservation throughout (the fences have a significant impact on nature – High Wood, Hail Weston is an ancient woodland).</p> <p>Irreplaceable habitats (e.g. High Wood, Hail Weston ancient woodland will be surrounded if this project and High Wood solar farm go ahead).</p> <p>Priority habitats throughout (they may be retained but what effect will the fencing, noise, lighting have?).</p>	N	An assessment is provided at ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].
			<p>Non-breeding birds during operation (they can dive into panels thinking it is water).</p> <p>Roosting bats during construction and operation (may be affected by the lighting and fencing).</p> <p>Reptiles should be scoped in as there are a lot of grass snakes in the area.</p> <p>Badgers should be scoped in as there are many in the area and they can be dramatically affected by the fencing.</p>	N	<p>An assessment is provided at ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>Species specific survey reports are provided in ES Volume 2 Appendix 7-2 to 7-7 [EN010141/DR/6.2].</p>
			<p>Otters have been returning to the area (seen in Duloe Brook last year) and should be scoped in.</p>	N	An assessment is provided at ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			Water voles are present in the area. Invertebrates should be scoped in (we have some rare moths in our area, such as the Small Eggar Moth which may be affected during construction.		Species specific survey reports are provided in ES Volume 2 Appendix 7-2 to 7-7 [EN010141/DR/6.2] .
			Water quality from increased siltation should be scoped in during operation as the change in runoff patterns can affect water quality and siltation.	N	An assessment is provided in ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1] , along with supporting appendices in ES Volume 2 [EN010141/DR/6.2] .
			Human health should be scoped in because losing green spaces and views to industrial views of panels can affect people's mental health.	N	An assessment is provided in Section 16.2 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] .
			Setting impacts to designated heritage assets should be scoped in during construction. Non-designated heritage assets should be scoped in because they are of importance locally.	N	An assessment is provided in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] .
			Noise impacts should be scoped in during decommissioning. Noise impacts of traffic should be scoped in during decommissioning. Traffic and transport – all aspects should be scoped in during decommissioning as well as construction	N	An assessment is provided for noise receptors and impacts in ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] . An assessment is provided for traffic and transport in ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			Increases in winter precipitation due to climate change should be scoped in during construction and decommissioning.	N	An assessment is provided in ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1] , supported by ES Vol 2 Appendix 15-3: Climate Resilience Assessment [EN010141/DR/6.2] .
			Changes in water availability should be scoped in during operation as they will need to wash the panels. Energy consumption from providing clean water and treatment of wastewater – including on site facilities such as toilets, and for washing of panels during operation should be scoped in.	N	An assessment is provided in ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1] , supported by ES Vol 2 Appendix 15-3: Climate Resilience Assessment [EN010141/DR/6.2] .
			Travel of construction workers should be scoped in. Vehicle emissions should be included during decommissioning as well as construction.	N	An assessment is provided in ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1] , supported by ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] .
			Effects on agricultural land use should be included during construction and decommissioning.	N	An assessment is provided in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] .
		Employment opportunities,	The East Park Energy Website states that the scheme will 'Boost the local economy through increased employment opportunities arising from both construction and operation of the scheme' and	N	The Applicant has carefully considered the employment impacts of the Scheme through Chapter 14 of the PEIR published at the 2024 statutory consultation and ES

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		economic impact	yet the Scoping Report at page 323 states that the Employment and GVA benefits are likely to be limited, and not significant. If the Scoping Report is accurate, which we would assume is the case (otherwise what other information in it may be incorrect), it is disappointing to see statements to the contrary being promoted as a benefit on the website.		Vol 1 Chapter 14: Socio Economics, Land and Tourism [EN010141/DR/6.1]. This estimates that the site area supports nine existing jobs that would be lost as a result of the Scheme. However, it is expected that there would be 20 gross direct full time employee equivalent roles during the operational phase, creating a net gain.

Table 1.16: Health & Safety Executive

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Hazardous substances	<p>Based on the PEIR it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no relevant hazardous substances.</p> <p>Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Part 4 of Schedule 1 for below-threshold substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.</p>	N	The Applicant notes this comment. There are measures set out in the outline Construction Environmental Management Plan [EN010141/DDR/7.3] that address the handling and storage of hazardous substances, should they be required during construction.
		Major accident hazard pipelines	<p>The major accident hazard pipelines are operated by National Grid Gas PLC:</p> <ul style="list-style-type: none"> • 7 Feeder Tydd St. Giles / Colmworth, HSE ref. 7469, Transco ref. 1728 • 9 Feeder Peterborough Comp / Huntingdon, HSE ref. 7470, Transco ref. 1729 	N	<p>The Applicant has been engaging with National Gas in relation to the pipelines that cross the Site.</p> <p>The Applicant has considered utilities within Section 16.4 on Major Accidents and Disasters in ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> • 18 Feeder Huntingdon / Cambridge, HSE ref. 7471, Transco ref. 1730 • 26 Feeder Huntingdon / Willington, HSE ref. 8423, Transco ref. 2703 <p>These pipelines cross the “scheme boundary” redline and through this site. The Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.</p> <p>In Chapter 16 of the PEIR, Section 16.4 provides some possible major accidents and disasters. There are none identified from major accident hazard sites or pipelines. HSE strongly recommends that the pipelines identified above are considered. It was not clear if there was consideration of risk assessments arising from the development's work activities. HSE would advise these matters are considered further in line with Advice Note 11 Annex G taking account of the following: <i>“it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.”</i> Note, that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.</p>		

Table 1.17: Historic England

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Archaeological assessment	We recommend further archaeological evaluation is undertaken across the sites A-D, within cable corridors and within grid connection prior to the submission of the full ES and in sufficient detail to inform the DCO application.	Y	The Applicant has undertaken archaeological trial trench evaluation across Sites A to D, and has completed further archaeological geophysical survey across the remaining parts of the Site. The results of the surveys are reported in ES Vol 2 Appendix 6-5 to 6-9 [EN010141/DR/6.2] and have informed the assessment in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] .
		PEIR chapter 2, design	2.4.9, Section 1.4.5.34: we appreciate that the design of the various elements of the proposed scheme have not yet been finalised, but in addition to the size of the various elements of the scheme, we would need details of foundation designs and depths to fully appreciate the potential impacts	N	The design parameters for the Scheme are set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] , and secured by the Design Parameters and Principles Statement [EN010141/DR/7.1] .
		BESS, impact on historical environment, impact on heritage assets	Historic England welcomes emergence of site D as preferable location for battery storage and substation. It is our opinion that location of the above infrastructure within site C would be more harmful in respect of historic environment, in particular scheduled sites Small Roman Town to the south of Great Staughton, and Two bowl barrows 900m and 1000m east of Old Manor Farm.	N	Following the 2024 statutory consultation, the Applicant confirmed its intention to locate the BESS and internal substation at Site D, as favoured by the consultee. A summary is provided in ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1] .

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			In our view, Option 1 is likely to be more harmful. It introduces large industrial structures in the immediate setting of two scheduled monuments. It would potentially require more excavation and would have a greater potential impacting on archaeology associated with the Roman town.		
		Construction, site access	We also recognise it (option 1) would likely require construction of Heavy-Duty Access Track along the boundary of the monument, and a temporary Heavy-Duty Access Track across part of the scheduled monument. Although the latter track would be removed the effects on the archaeological deposits resulting from construction and use would be a permanent and residual harm.	Y	Following the 2024 statutory consultation, the Applicant confirmed its intention to locate the BESS and internal substation at Site D, as favoured by the consultee. A summary is provided in ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1] . The design and mitigation measures for the temporary access track during the construction phase are set out in the outline Archaeological Mitigation Strategy [EN010141/DR/7.15] .
		Cabling, archaeology	Historic England notes that low voltage cables are to be laid in the trenches to connect solar panels to other infrastructure. No provision or exclusion is proposed for the areas of archaeological sensitivity. We consider that this is an oversight as the trenches could have a significant impact on the identified areas of archaeological sensitivity. We recommend that details of alternative solution are devised and presented in ES.	Y	The Applicant is proposing that cables will be surface mounted using no-dig solutions within defined 'Areas of Archaeological Constraint', as set out in the outline Archaeological Mitigation Strategy [EN010141/DR/7.15] .

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			Details of higher voltage cable connections should be specified within the ES to enable assessment of the impacts on buried archaeological remains.		
		Crime prevention, CCTV	CCTV and Monitoring Systems. We recommend that use of these systems within the site C is tied with the crime prevention strategy for the new scheduled monument – Roman Small Town to the south of Great Staughton.	N	The Applicant notes these comments. The Applicant understands Historic England's concern in relation to the newly scheduled monument, but is not proposing CCTV to monitor the scheduled monument as part of the Scheme.
		Landscape and visual impact	<p>After review of selected viewpoints, we are concerned that there is limited coverage by the viewpoints of the area of scheduled monument Roman Small Town to the South of Great Staughton.</p> <p>We would recommend that additional viewpoints are selected from public rights of way (preferably at the point crossing River Kym), and within the extent of the monument itself. Due to the extent of the designated area it is likely that at least two locations will have to be selected to provide representative depiction of impacts.</p> <p>At least one of the new viewpoints should be illustrated with wireframe diagrams and photomontages of the proposed development. We would welcome further engagement in relation to this matter.</p>	Y	The Applicant has included an additional viewpoint as part of the landscape and visual assessment at ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] . This additional viewpoint has been taken from the public footpath alongside the River Kym on the northern edge of the scheduled monument looking south, and is included as Viewpoint 83. A photomontage from Viewpoint 83 is included as part of the ES Vol 3 Figure 5-87 [EN010141/DR/6.3] .

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		Cultural heritage, geophysical surveys, PEIR chapter 6	The historic environment baseline information presented as part of full ES should also take into account additional results of geophysical surveys covering cable corridors connecting sites A-D and the grid connection to St Neots Substation; and results of trial trench evaluation undertaken across sites A-D and cable corridors.	N	<p>The interim archaeological trial trenching reports for the fieldwork are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>The archaeological baseline presented in ES Vol 2 Appendix 6-2 [EN010141/DR/6.2] and summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p>
		Cultural heritage	<p>Table 6.3 Criteria for Establishing Importance of Heritage Assets - Non-designated Heritage Assets with archaeological interest of regional significance should be ascribed Medium Importance. At the moment these archaeological remains appear to be classed as Low Importance because they are only recorded in local HER and do not meet the bar for national designation.</p> <p>There will be a range of significance represented in these assets and therefore a more effective and nuanced assessment would be welcomed. We also recommend that the wording describing criteria for Medium Importance Heritage Assets is amended for clarification.</p>	N	The definitions of non-designated heritage assets within Section 6.4 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to reflect this feedback.

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		Assessment matrices	6.3.18 Historic England agrees that assessment should utilize use of professional judgement. Whilst standardised EIA matrices are considered in to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England recommends that standardised matrices should be provided in an appendix as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter of ES.	N	<p>The EIA matrices have been retained within Section 6.4 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] and also replicated within ES Vol 2 Appendix 6-4 [EN010141/DR/6.2] (as per request of Bedford Borough feedback - see below). It is not considered necessary to include the assessment criteria tables as a separate appendix in addition.</p> <p>Qualitative judgements in relation to setting, based on AOCs professional judgment, have been provided for all assets as is presented within Table 1 of ES Vol 2 Appendix 6-4 [EN010141/DR/6.2] and summarised within Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
		Cable corridors, consultation materials	<p>6.4.5: We note that cable corridors connecting sites A-D have not been mentioned. We take that this omission is an error as elsewhere in the document it has been clarified that all cable corridors will be subject to geophysical survey to inform ES.</p> <p>6.4.6: Historic England would like to highlight that the desk-based assessment and geophysical survey would not be sufficient to establish with certainty archaeological potential and significance of cable corridors and grid connection. Certain categories of buried archaeological remains are</p>	N	<p>The interim archaeological trial trenching reports for the fieldwork are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>The archaeological baseline presented in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p>

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			not readily detectable through use of these methods. Trial trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES. All values for non-designated asset will effectively be provisional until these assets have been effectively characterised. All surveys should be undertaken prior to preparation of ES.		The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.
		Geophysical surveys, cable corridors, grid connection corridor	6.6.39: We welcome commitment to undertaking geophysical survey along the grid connection corridor. Due to high archaeological potential of this area and presence of known cropmark sites within the boundaries of the scheme trial trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES.	N	The assessment of archaeological potential presented in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to acknowledge High potential for Roman remains within cable corridor between Sites C and D. The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.
		Roman Small Town	6.6.21 Historic England would like to highlight that full extent of the Roman Town has not yet been established. The geophysical survey while clearly helpful cannot on its own define extent of archaeological remains.	Y	The Applicant has undertaken trial trench evaluation and further geophysical survey on land within the Order Limits, as set out in ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] , and reported in ES Vol 2 Appendix 6-5 to 6-9 [EN010141/DR/6.2] .

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		Roman Small Town	6.6.29 Historic England would like to highlight that while the limited archaeological trial trench evaluation within the core of the Roman Town confirmed archaeological character of anomalies identified during geophysical surveys, it also demonstrated that significant number of features and deposits have not been detected by geophysical work. This was due to the size, type and other characteristics of these features and deposits and is typical of a highly complex archaeological site, such as a Roman town.	N	The Applicant notes this comment.
		Areas of archaeological sensitivity, trial trench evaluation	<p>6.6.30 Historic England notes that areas of the site C without recorded geophysical anomalies have been assigned 'Low potential' for presence of archaeological remains of any date. This assumption is not correct as certain categories of buried archaeological remains are not readily detectable through use of geophysical techniques. In the areas adjacent to the core of the Roman Town various forms of peripheral activity can be expected, such as communication routes, burial grounds, etc.</p> <p>In our view, trial trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES. This is of importance within site C.</p>	N	<p>The interim archaeological trial trenching report for Site C is included as ES Vol 2 Appendix 6-8 [EN010141/DR/6.2].</p> <p>The assessment of archaeological potential presented in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to include reference to the completed trial trenching works within Site C.</p>

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		Areas of archaeological sensitivity, trial trench evaluation	We recommend that the potential for Roman remains is assessed as High. We welcome commitment to undertaking geophysical survey in this area. Trial trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES.	N	<p>The assessment of archaeological potential presented in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to acknowledge High potential for Roman remains within cable corridor between Sites C and D.</p> <p>The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.</p>
		Heritage assets, assessment methodology	6.6.50 Historic England supports inclusion of three additional heritage assets beyond 3km boundary in the setting assessment. The evidence for scoping out/scoping in assets from the assessment should be presented as part of the ES. We welcome that this information has been presented in appendices.	N	The Applicant notes these comments.
		Heritage assets, assessment methodology	6.6.53 Historic England supports inclusion of agreed non-designated heritage assets within setting assessment.	N	The Applicant notes these comments.
		Green infrastructure, heritage, archaeology, Roman Small	6.7.2 Historic England notes that designation of Roman Small Town to the south of Great Staughton may result in a change to the proposed use of the land. We support removal of the scheduled monument from agricultural	N	<p>The interim archaeological trial trenching report for Site C is included as ES Vol 2 Appendix 6-8 [EN010141/DR/6.2].</p> <p>The assessment of archaeological potential presented in Section 6.8 of ES</p>

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		Town, heritage assets, site management	cultivation. As the area of the scheduled monument is also proposed to be used for ecological mitigation the details of the intended changes and long-term management of this site should be specified in the ES.		<p>Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to include reference to the completed trial trenching works within Site C.</p> <p>The Applicant has prepared a mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out the maintenance and management of proposed landscape elements.</p>
		Green infrastructure, heritage, archaeology, Roman Small Town, heritage assets, site management	<p>6.7.4 Green Infrastructure proposed for the Scheme would cover the extent of the newly Scheduled Roman small town. It is stated that there would be limited impacts upon buried archaeological remains with the area turned into grassland. This would represent significant improvement to the management of the scheduled monument, and we consider that it would be a heritage benefit.</p> <p>Historic England supports the outlined approach. The details of appropriate long-term management of the site, such as fences, management and</p>	N	<p>The Applicant notes these comments.</p> <p>The Applicant has prepared a mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7]</p>

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			access arrangements, should be specified in the ES.		sets out the maintenance and management of proposed landscape elements.
		Trial trenching, green infrastructure, mitigation	<p>Archaeological trial trench evaluation might identify additional areas which would require exclusion zones, especially to the south of the site C. Therefore, it will be necessary to review and made necessary amendments to the extent of the green infrastructure when complete heritage baseline is available.</p> <p>We welcome inclusion of embedded measures to avoid harm to heritage assets. We would like to stress that this approach must be informed by complete heritage baseline data. Therefore, results of archaeological surveys (including trial trench evaluation) would be crucial to inform the design of the scheme.</p>	N	<p>The assessment of archaeological potential presented in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to include reference to the completed trial trenching works within Site C.</p> <p>The Applicant has prepared a mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
		Outline Construction Environmental Management Plan	<p>We are pleased to see that the Outline Construction Environmental Management Plan (oCEMP) includes a commitment to avoid archaeological remains, including specific measures in relation to the Scheduled Roman small town as well as other more general measures regarding identified archaeological remains.</p> <p>However, we would like to highlight that location of two temporary construction compounds (as</p>	N	<p>The interim archaeological trial trenching reports for the completed elements of the fieldwork are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>The archaeological baseline presented in ES Vol 2 Appendix 6-2 [EN010141/DR/6.2] and summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to</p>

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			<p>shown on PIER Figure 2-6: Indicative Construction Access and Compounds) overlaps with the extent of already identified archaeological remains. The affected archaeological remains are: Heritage Asset no. 210 and group of geophysical anomalies no. 41a within site A; and group of geophysical anomalies no. 43a within site C.</p> <p>The temporary compound will have a permeant effect on below ground archaeological remains. We therefore recommend that siting of compounds is reassessed, when full baseline heritage information is available. If possible, temporary compounds should be moved to areas of low archaeological potential.</p>		<p>include reference to the completed additional areas of geophysical survey and fieldwork.</p> <p>This updated information has been used to inform the design and the mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>The Applicant has moved the proposed locations of the two temporary construction compounds, as shown by Work No. 7 on the Works Plan [EN010141/DR/2.3], and ES Vol 3 Figure 2-5 Illustrative Construction Access and Compounds [EN010141/DR/6.3].</p>
		Areas of Archaeological Constraint, construction	<p>6.7.8 states that Areas of Archaeological Constraint (AAC) will be identified prior to construction and preserved in situ by using non-intrusive construction techniques. The details are presented in Volume 3, Fig 2-3a.</p> <p>We would like to highlight that only solar panels mounting is specified on the above figure. We would welcome the opportunity to review technical details of other infrastructure, such as low voltage cable connectors, transformers,</p>	Y	<p>The Applicant has prepared a mitigation strategy (inclusive of defined Areas of Archaeological Constraint) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>

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			<p>fencing, etc. proposed in areas of archaeological sensitivity.</p> <p>The relevant details should be specified in the chapters or appendices of the ES.</p>		
		Cable routing, archaeological surveys, drilling,	<p>The DCO application should specify the details of the engineering solution and clearly demonstrate that the drilling depth would be adequate to avoid impacts on the designated archaeological remains. Results of archaeological surveys and professional judgement should be used to inform the assessment. The assessment should include consideration of impacts and effects in the 'worst case' scenario.</p> <p>In addition, the potential direct and indirect impacts associated with the lubricants used in these sorts of drilling approaches (e.g. bentonite slurry outbreak) will need to be considered. This should be refenced and referred back to in the main heritage chapter of the ES.</p> <p>Location of launch and receiving pits would need to be carefully considered and informed by results of archaeological surveys, including evaluation. These locations should avoid significant remains associated with Roman town as these might be of equivalent significance to designated heritage assets.</p>	Y	<p>Details of the proposed HDD method, including location of the launch and receiving pits and depth are detailed within the oAMS [EN010141/DR/7.15].</p> <p>Mitigation measures potential for bentonite slurry outbreak are provided in the oAMS [EN010141/DR/7.15] and the outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3].</p> <p>Details of the construction, use and removal of the proposed temporary access track across the Scheduled Monument are presented within the oAMS [EN010141/DR/7.15].</p>

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		Enhancement and mitigation	The details of the proposed enhancement measures should be specified in the ES. However, any programme of intrusive works within the scheduled monument would have to be based on specific research programme in cooperation with established academic institutions. This therefore would be better dealt with at a later time, separate to DCO application.	Y	An outline Heritage Enhancement Strategy [EN010141/DR/7.16] , has been produced which contains measures for making a positive contribution to the historic environment. These measures are also presented in Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] .
		Green infrastructure, cultural heritage, trees and hedgerows	<p>We note that the creation of new green infrastructure across the Scheme has been described as having no direct impact upon cultural heritage remains (both known and unknown). We do not agree with this statement as hedge and tree planting could cause permanent and detrimental impacts on buried archaeological remains.</p> <p>We would recommend that assessment of the proposed tree and hedge planting work refers to the Appendix A of the document 'Assessing the Impact of Tree Roots on Archaeology (2024): https://knowledge.oxfordarchaeology.com/library/12564.</p> <p>This document states that the choice of tree types and the location of planting needs to be considered carefully on a site-by-site basis.</p> <p>We recommend that the green infrastructure plan is re-assessed when full baseline heritage information becomes available. The plan should</p>	Y	<p>The archaeological baseline presented in ES Vol 2 Appendix 6-2 [EN010141/DR/6.2] and summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p> <p>This updated information has been used to inform the design and the mitigation strategy (inclusive of areas of no impact) related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>

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			be then amended as necessary to avoid unnecessary impacts on the heritage assets.		
		Construction, impact on heritage assets	<p>Tables 6.8; 6.9; 6.11; 6.13 Description of Direct Impacts during construction phase:</p> <p>We note that the 'Description of impacts' column omitted impacts resulting from trenching for low voltage cables and other cables connecting transformers, inverters, etc. We consider this omission to be a mistake.</p> <p>We recommend that these direct impacts are included in the assessment. In the areas of archaeological sensitivity alternative solutions to excavation of trenches should be explored. Details of any engineering solutions should be presented in ES. If engineering solutions are not possible then clear and convincing justification should be provided.</p>	Y	<p>The assessment tables within ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include trenching for low voltage low voltage cables and other cables connecting transformers, inverters, etc.</p> <p>The archaeological baseline presented in ES Vol 2 Appendix 6-2 [EN010141/DR/6.2] and summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p> <p>This updated information has been used to inform the design (including temporary construction compound locations) and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>

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		Hedgerows, trees, woodland, areas of archaeological sensitivity, green infrastructure	<p>We note that 'Predicted Magnitude of Impact' column states that predicted effects of hedge, tree and woodland planting would be negligible. We disagree with this assumption. As previously advised hedge, tree, and woodland planting could cause permanent and detrimental impacts on buried archaeological remains. We recommend that impact of planting and other green infrastructure is reassessed, when full heritage baseline information becomes available. An appropriate mitigation should then be devised. Woodland, tree and hedge planting should be avoided on areas of archaeological sensitivity if possible.</p> <p>We note that several heritage assets would be impacted by construction of temporary construction compounds. The impacted assets include group of geophysical anomalies no. 41a (heritage asset no. 210) within site A; and group of geophysical anomalies no. 43a within site C. Both are assigned medium importance at this stage. The impacts caused by construction of the compounds would be permanent.</p> <p>We recommend that the impacts should be reassessed when full heritage baseline information becomes available. Alternative locations for the compounds impacting on heritage assets of medium (or higher) importance are explored. If any of the temporary compounds cannot be moved to avoid causing impact on heritage assets, then clear and convincing</p>	Y	<p>The assessment tables within ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include trenching for low voltage low voltage cables and other cables connecting transformers, inverters, etc.</p> <p>The archaeological baseline presented in ES Vol 2 Appendix 6-2 [EN010141/DR/6.2] and summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p> <p>This updated information has been used to inform the design (including temporary construction compound locations) and the mitigation strategy related to the potential for direct and indirect impacts on potential archaeological remains, as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>

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			justification of the location choice should be provided in the ES.		
		Archaeological assessments, heritage assets, geophysical surveys, trial trench evaluation	<p>We support the commitment to review the assets significance and predicted level of direct impact to archaeological remains within the Scheme on completion of the trial trench evaluation. An iterative approach will help develop a realistic assessment of the sites potential and the possible levels of impact as more information becomes available. All significance and impact values for non-designated assets should effectively be treated as provisional until these assets have been effectively characterised.</p> <p>6.8.19; 6.8.28; 6.8.37: Historic England notes that geophysical survey work is currently being carried out within the corridors connecting Site B to C, Site C to D, and Site D to St Neots Substation. We welcome the commitment to include the results in the submission of the application to the DCO.</p> <p>We would like to highlight that trial trench evaluation would be necessary to ground truth the results of geophysical survey and provide adequate heritage baseline information for the ES. All significance values for non-designated asset will effectively be provisional until these assets have been effectively characterised.</p>	Y	<p>The archaeological baseline presented in ES Vol 2 Appendix 6-2 [EN010141/DR/6.2] and summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] have been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p> <p>The assessment of archaeological potential presented in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] has been updated to include reference to the completed works.</p>

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		Cable route, trenching, Areas of Archaeological Constraint, heritage assets	6.8.35: It is stated that the cable route would mostly be lain using open trench approaches, but that HDD would be used in identified Areas of Archaeological Constraint (AACs). We support this approach; however, we would like to highlight that intrusive investigations would need to be undertaken first in order to understand the depths of archaeology in these areas, and therefore how deep the cables would need to be buried to avoid significant impacts on the buried archaeological remains.	Y	The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.
		Groundwater, soil compression, heritage assets	We note that changes to groundwater and compression have been described as indirect impacts. We consider that the severity of these impacts is comparable to 'direct impacts'. Therefore, we recommend that these impacts are assessed in the same manner as direct impacts, especially as some of the 'indirect' impacts could cause negative effects on the significance of the designated heritage assets, such as Roman Small Town to the south of Great Staughton	N	The potential for indirect physical impacts is considered in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] . Liaison with the hydrology team indicates that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts The full hydrology assessment for the Scheme is outlined in ES Vol 1 Chapter 8 [EN010141/DR/6.1] .
		Hydrology	We are pleased to see that the hydrology team has considered the potential impacts to heritage	N	The Applicant notes these comments.

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			and that scour, or other significant hydrological impacts are not anticipated.		
		Scheduled monument, visual impact, mitigation, BESS	<p>The impacts on the setting of a scheduled monument, Roman Small Town to the south of Great Staughton, have been assessed as either minor (Option 1) or moderate (Option 2). The level of impact would depend on the choice of location for the BESS and substation.</p> <p>We note that no visual mitigation has been specified for the parts of the site C adjacent to the Roman Town (as shown on Illustrative Environmental Masterplan). We consider that it is an oversight. Additional screening, inclusion of buffers, or creation of vistas for example, could reduce impact of the project on the scheduled monument.</p> <p>We recommend that ways to mitigate setting impacts within site C are reassessed and included in the design of the project following decision on the location of the BESS and East Park substation. The visual mitigation should take into account finalised heritage baseline information (including trial trench evaluation and analysis of additional, heritage specific viewpoints).</p>	Y	<p>The Applicant has assessed the impact of the Scheme upon the setting of the <i>scheduled monument, Roman Small Town to the south of Great Staughton</i>.</p> <p>The BESS and East Park substation has been located within Site D (as set out in ES Vol 1 Chapter 3 [EN010141/DR/6.1]) and the design of environmental enhancements and screening has been updated across the Scheme.</p> <p>The updated assessment of the potential for impacts on the setting of <i>Scheduled monument, Roman Small Town to the south of Great Staughton</i> has been produced as set out in Table 1 and Section 3 of ES Vol 2 Appendix 6-4 [EN010141/DR/6.2] and in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
		Archaeological assessments, trial trenching	We understand that additional archaeological investigation is currently ongoing to inform the ES. The work is being undertaken across the	Y	The archaeological baseline summarised in Section 6.6 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>Scheme area in the form of additional geophysical survey and a trial trench evaluation.</p> <p>We would recommend that results of trial trench evaluation undertaken across cable corridors connecting sites A-D and the grid connection to St Neots Substation are also used for final assessment and preparation of the ES.</p>		<p>[EN010141/DR/6.1] has been updated to include reference to the completed additional areas of geophysical survey and fieldwork.</p> <p>This updated information has been used to inform the mitigation strategy (inclusive of areas of no impact and no dig solutions) related to the potential for direct and indirect impacts on potential archaeological remains as is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>The oAMS [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.</p>
		Mitigation, areas of archaeological significance	<p>6.9.4: We welcome inclusion of embedded mitigation measures in areas of archaeological significance. These measures include 'no dig solutions', revision of design and layout of the scheme, and preservation by record. We support use of these measures, but would need to see further details of the proposed solutions.</p> <p>We recommend that all the details (extent of the areas, specification of non-dig methods, etc.) are specified in the ES.</p>	Y	<p>The Applicant notes these comments.</p> <p>This mitigation strategy (inclusive of areas of no impact and no dig solutions) related to the potential for direct and indirect impacts on potential archaeological remains is presented in the oAMS [EN010141/DR/7.15] and Section 6.9 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Heritage assets, listed buildings, visual impact	<p>Historic England notes the report only identifies two listed buildings that would be significantly affected –namely Chadwell Farmhouse and Great Staughton Manor. Both buildings are grade II listed. Grade II listed buildings are however outside of the remit of historic England and we therefore recommend you take advice from the relevant Conservation Officers in the LPA.</p> <p>We would however wish to draw to your attention to the following Listed buildings, the settings of which we believe would be impacted due to their spatial relationship to the application site. These are:</p> <ul style="list-style-type: none"> - The Church of All Saints, Little Staughton (grade I); - The Church of St Mary the Virgin, Keysoe (grade I) <p>We believe that particular attention should be given to assessing the impact of the development upon these buildings. The likely effects should be clearly described with a clear narrative and illustrated by way of appropriate verified graphical material such as wireframe diagrams and photomontages of an appropriate scale and format.</p> <p>We also believe that the development is likely to impact upon south-easterly views from Great Staughton conservation area and recommend</p>	N	<p>ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a detailed desk-based assessment and settings assessment which describe the historic development and archaeological resource of the area. This work identifies heritage assets within the villages, including designated assets such as the Grade I listed Church of All Saints in Little Staughton, the Grade I listed Church of St Peter in Pertenhall, and a range of Grade II listed farmhouses, cottages and associated structures.</p> <p>The ES also records the archaeological and historic landscape context of both settlements, including evidence of medieval and post-medieval settlement shrinkage, ridge and furrow, moated sites, and historic routeways which are integral to the character of the villages. These have been assessed both for potential direct impacts and for effects on their settings.</p>

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			that a similar robust assessment is also conducted in this regard.		
		Archaeological Geophysical Survey Report (Appendix 6-5)	<p>This document presents the findings of a magnetic gradiometry survey carried out over the proposed Scheme area. It was noted that the surveys were carried out between November 2022 and October 2023 (Section 5.1). A statement should be included in the report about if the weather impacted the work at all, such as making some areas of the site inaccessible.</p> <p>It is stated that the survey was carried out using a Bartington Cart system (Section 5.5) and a Sensys MAGNETO ® MXPDA push cart (Section 5.10). It would be useful to know if any areas investigated during the survey were inaccessible to the carts and if alternative, hand-held options were used. It would also be useful to include an explanation of why two different systems were used to survey the site.</p>	N	The updated archaeological geophysical survey report (including the requested additional information) for the completed elements of the geophysics is included as ES Vol 2 Appendix 6-5 [EN010141/DR/6.2] .
		Archaeological Targeted Trial Trench Evaluation (Appendix 6-6)	We note that there was no discussion in the report about whether environmental samples were recovered during the evaluation. Information provided by analysis of the samples would help understand the paleoenvironmental potential of the site and assess any potential impacts of the scheme. The sample information should be provided in the final report.	Y	The interim archaeological trial trenching reports for the fieldwork are included as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2] .

Table 1.18: Huntingdonshire District Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	PEIR chapter 2, operational lifespan, construction, decommissioning	Noting the indicative operational lifespan of scheme components set out in Table 2-35, along with the construction phase build out anticipated to be months 2-30, there is a need to understand if there are likely to be any additional phases of decommissioning and construction within the operational phase, and how significant such phases could be if there are sections of the scheme which will be replaced/renewed due to either loss of productivity or enhancements in the associated technology.	N	The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1] . The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.
		Outline Decommissioning Environmental Masterplan, soil quality	It is considered that the Outline Decommissioning Environmental Plan should be clear on what elements of the scheme will be decommissioned and removed from the site, including infrastructure which is underground (rather than left to discussion and agreement with landowners or assumed to be left in situ). This should also consider the standard and quality of the land to be returned, noting the documentation only refers to “returning land to original use”; an assessment of end soil quality should be considered and returning the land to its original quality (if not enhanced).	N	The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at decommissioning all solar modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be left in situ to reduce the environmental impact of excavation. This approach has been assessed in the ES [EN010141/DR/6.1] .

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts.</p> <p>At decommissioning, the Scheme will be removed as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the land will be handed back to the landowners, with the Applicant's leases ending. The Applicant cannot commit that following decommissioning the landowners would revert the land to arable farmland, however it is considered reasonably likely this would be the case. The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.</p>
		Construction, Operation, Decommissioning, environmental health	<p>Volume 2: Technical appendices 2-3, 4 and 5: Outline construction, Operational and Decommissioning environmental Management Plan have been reviewed by HDC's Environmental Health Officer who advises that the outline cEMP, oEMP and dEMP is acceptable in principle in relation to Environmental Health matters and it is understood that more detailed versions will be prepared for the DCO.</p>	N	<p>The Applicant notes these comments.</p> <p>Updated versions of the documents mentioned in the Consultee's response are available in the DCO application as outline Construction Environmental Management Plan [EN010141/DR/7.3], outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p>

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		Alternatives and design evolution, PEIR Chapter 3, BESS, scheduled monument	<p>It is acknowledged that the red line site has changed in some places following the Scoping Opinion issued by the Planning Inspectorate. The amendments to Site C and reduction in panels following the Scheduled Monument is welcomed.</p> <p>The documentation requests views on the location of the BESS and East Park Substation. The separation from Site C and the Scheduled Monument is desirable, however HDC welcomes further discussion on these points once we have a more detailed understanding of Site D and its constraints.</p>	N	The Applicant notes these comments.
		EIA methodology, PEIR Chapter 4	The content of this section of the PIER is noted, as raised above, it is questioned whether there will be any other stages to the development during the operational phases such as replacement/renewal of the technology.	N	<p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>
		Landscape and visual, scale, visual impact,	By virtue of the scale of the proposals, there will be substantial residual landscape character and visual impacts that cannot be mitigated.	N	The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5:

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		Public Rights of Way	There are concerns about the visual impact on Public Rights of Way; this includes the various different users of the network including equestrians.		<p>Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open

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					<p>and preserve views, such as across the Kym Valley;</p> <ul style="list-style-type: none"> • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features.
		Cultural heritage and archaeology, historic environment, mitigation, heritage	There is some inconsistency in the information that is presented due to the scheme changes introduced through the Scheduling of the Roman Small Town south of Great Staughton. The developer has included all the information requested at the scoping stage of the scheme. The scope of the Historic Environment assessment is acceptable.	N	The Applicant notes these comments.

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		assets, visual impact	<p>The removal of solar arrays from the site of the new scheduled monument has created a green buffer to the south of the Great Staughton and Staughton Highway Conservation Areas which has helped to alleviate the potential impacts on their settings. Solar arrays and associated infrastructure will be visible in longer distance views as the land rises to the south of the conservation areas but the impact of this on the settings of those heritage assets is likely to be modest.</p> <p>The extension of Site C to the west will have a greater impact on the setting to Staughton Manor and Garden Farmhouse (both Grade II listed) but this is likely to be mitigated over time by planting; any harm to the significance of these heritage assets should be justified but the harm is likely to be less than substantial."</p> <p>HDC is not the statutory consultee for archaeology so defers to the comments provided by the Cambridgeshire Historic Environment Team as part of Cambridgeshire County Council's reply. We support the request that further trial trenching is undertaken within appropriate timescales in order to understand the position and noting the significant find in relation to the new Scheduled site, and the concern in relation to cable corridor from Site C to D.</p>		

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		Ecology and natural conservation	<p>With regard to Priority Landscapes of Huntingdonshire, at the October 2024 Cabinet meeting, HDC Cabinet decision was:</p> <p>a) formally recognised and adopted the Priority Landscapes of Huntingdonshire as set out in the report now submitted;</p> <p>b) endorsed the use of the Nature Recovery Network for Huntingdonshire Document as an evidence base for the identification of Priority Natural Landscapes;</p> <p>c) endorsed the use of the Nature Recovery Network for Huntingdonshire Document to inform the response to and engagement with the development of the Local Nature Recovery Strategy and subsequently future Planning Policy;</p> <p>d) delegated authority to the Assistant Director (Strategic Insight and Delivery) in consultation with the Executive Councillor for Parks and Countryside, Waste and Street Scene to make any minor amendments to the Priority Landscapes of Huntingdonshire policy (subject to a review of the policy to be undertaken within three years);</p> <p>e) delegated authority to the Corporate Director (Place) to implement any necessary procedural changes as a result of this endorsement; and f) agreed that the report and presentation be also presented to the Local Plans Advisory Group.</p> <p>In relation to the East Park Scheme, regard should be had to this document and reference to</p>	N	The Applicant notes these comments.

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			the Hail Weston-Bushmead Habitat Network. In addition to the objectives for this area, it should be noted that paragraph 4.7.4 for the Priority Area Vision states: "The solar parks within the area will contribute new hedgerows and areas of flower-rich grassland, with any new solar parks also contributing new woodland and other habitats to connect Huntingdon Wood, High Wood and Moor Road Marshy Fields."		
		Wildlife and habitats, hedgerows, woodland and trees	Without prejudice to ongoing conversations, it is advised that solar panels should be adequately set back from South Brook which is located along the southern boundary of Site D. The current masterplan shows a buffer of 25m although it is acknowledged within the submission that this may change; HDC considers that this should be a minimum distance and should include wildflower, native hedgerow and trees within the buffer so as to promote wildlife connectivity between the nearby County Wildlife Sites.	N	This buffer has been maintained as it is considered a sufficient offset to mitigate for ecological impacts, whilst not compromising the efficiency of land use for the Scheme. No solar panels are proposed within 25m of the South Brook.
		Impact on wildlife	<p>The proposals will impact upon skylarks, in relation to mitigation it is advised that:</p> <ul style="list-style-type: none"> • It is recommended that two skylark plots are created for every one territory lost, with two plots created per hectare. • A 2:1 ratio has been typical for development to account for natural variability in mitigation success and ensuring a gain in skylark habitat. 	Y	<p>The mitigation for skylarks and other breeding birds is set out in Section 6.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat.</p>

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			<ul style="list-style-type: none"> • Typical skylark foraging distances do not exceed 120m in normal circumstances. Longer distance also reduce time spent nest guarding, thus increasing predation risks to young. If skylark plots are to be located further than 120m from the solar farm, the proposed grassland under the solar panels will not provide foraging enhancement for the displaced skylark and additional mitigation will be required to provide foraging opportunities closer to the created plots e.g. beetle banks. • It is likely that management of any offsite mitigation (should it be required) will need to be secured by a Section 106 Agreement to last the lifespan of the solar park. • Regard should be given to adjacent sites and mitigation which is to be secured to ensure that the proposals form a cohesive mitigation strategy. <p>The Skylark mitigation strategy should follow, but is not limited to, the recommendations provided in the links below:</p> <ul style="list-style-type: none"> • Stewardship management practices as set out in AB4: Skylark Plots (https://www.gov.uk/countryside-stewardship-grants/skylark-plotsab4). • RSPB advice: https://www.rspb.org.uk/helping-nature/what-wedo/influence-government-and-business/farming/advice-for-farmershelping-bird-species/skylark-advice-for-farmers (including Land 		Mitigation is set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .

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			<p>Management for Wildlife – Skylark, downloadable from the banner at top of the page).</p> <ul style="list-style-type: none"> • Farm Wildlife advice: https://farmwildlife.info/how-to-do-it/farmedarea/skylark-plots/ 		
		Noise and vibration	<p>We largely agree with the content of Chapter 10 in relation to noise and vibration. In relation to the Main Report p10-21, Table 10.6 – “Construction Time Period LOAEL and SOAEL” – we would prefer the threshold to be a single figure rather than a range of dB values, and would prefer the lowest value.</p> <p>Section 10.6.15 identifies the noise limits derivation method as agreed, however, Table 10.18: “NSR Locations” lists the “Baseline Noise Location and Background dB” as a range of dB values but we would prefer to use the single lowest value rather than the highest value when transposing to Table 10.29 “NSR Noise Limits” on p10-50</p>	Y	<p>Table 5.6 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] has been amended but it is important to note that this is the lowest level required and, in the scenario, where the ambient level at NSR is at 65dB or higher, the noise threshold limit would increase up to 75dB. The table heading has been changed to the ‘lowest threshold level’.</p> <p>Table 10.18 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] gives a range of background sound levels as the range refers to different times of the day (i.e. daytime, night-time and sunrise) and so the range is correct. Reference to Table 10.29 must actually mean Table 10.19. This shows the relevant background that is relevant to the time of day. Using the lowest value is an incorrect application and misleading in respect of the correct baseline as it need to be applied to daytime and sunrise operating periods.</p>
		Air quality	The air quality assessment methodology is acceptable and in accordance with IAQM guidance.	N	The Applicant notes these comments.

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			<p>It is acknowledged that further consideration of vehicle emissions encompassing atmospheric dispersion modelling is not required.</p> <p>It is acknowledged that the proposal is unlikely to cause an exceedance of any Air Quality Objective. We agree with the further work required in relation to air quality assessment.</p>		
		Waste	<p>The CL:AIRE Code of Practice reference is noted. HDC defers to Cambridgeshire County Council in regard to their authority for Minerals and Waste and any arisings which may be imported/exported to/from the site.</p> <p>As referred to above, there are concerns with the statement that conduits and other material which is more than 1m below ground level will be left in situ following the decommissioning phase. It remains unclear if the operational lifespan of some infrastructure will result in additional waste to that set out within the three phases of the scheme and HDC welcomes further discussions around these points.</p>	N	<p>The Applicant has set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] that at decommissioning all solar modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be left in situ to reduce the environmental impact of excavation. This approach has been assessed in the ES [EN010141/DR/6.1].</p> <p>The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts.</p>
		BESS, fire risk	The acknowledgement of the potential impact of the BESS in the event of a fire is acknowledged,	N	The Applicant notes these comments.

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			<p>along with references to the National Fire Chiefs Council (NFCC) Guidance and design solutions proposed. HDC welcomes the proposal to prepare an Outline Battery Safety Plan (oBSMP) and ensure this is complied with through a requirement of the DCO. Due to potential scale and magnitude of this risk, HDC supports Cambridgeshire County Council and Bedford Borough Council responses and further engagement with the Local Authorities and the Fire and Rescue Service.</p>		<p>The Applicant has prepared an outline Battery Safety Management Plan [EN010141/DR/7.10] as part of the application.</p>

Table 1.19: Kimbolton and Stonely Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Scale, impact on local area	This solar farm is simply too large for the area. It is overwhelming for an area of this size and it would dramatically change the surrounding villages and result in a detrimental effect on the quality of rural life in the area. Views will be destroyed and villages surrounded by solar panels, fundamentally changing the local landscape.	N	<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, reducing the visual impact of the Scheme at these locations, as set out in the Design Approach Document [EN010141/DR/5.6].</p>
		Alternative locations	It was agreed by the parish council that not enough consideration had been given to looking at alternative locations for solar energy. Solar panels could be placed on industrial buildings	N	Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar

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			and car parks in addition to any new housing developments in the area, for example.		installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.
		Food security, loss of agricultural land	The government has previously stated that food security is important for national security and that 'Best' and 'Most Versatile' agricultural land should be of important consideration. The proposed land for this development is classed as Grade 1, Grade 2 and Grade 3a and a large proportion of the proposed land lies within these categories. Therefore, this loss of farmland will have a detrimental impact on food security both locally and nationally.	N	<p>As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The Applicant has provided an assessment of the Scheme on Land and Soils in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>An outline Soil Management Plan [EN010141/DR/7.9] has been prepared which sets out how soils will be sensitively managed across the lifetime of the Scheme.</p> <p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK's food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK's food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government's Food Security Report 2021, which stated that climate change and other environmental pressures like soil degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's domestic food production. This report also found that climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Proposed Development, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change.</p> <p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>Using Solar Energy UK's estimate of six acres of land required per megawatt of solar power generated, meeting this target in full would require the use of 218,530 hectares of land, which is less than 1% of the UK's total land area. However, this figure does not take into account how the Government estimates that future solar developments will require less land per megawatt (MW) generated (the Proposed Development would require around three acres of land per MW). If, for example, all future developments required four acres per MW, then this would reduce the total amount of UK land required to around 0.6%.</p> <p>As of 2022, around 63.1% of land in England is in agricultural use. This amounts to 8,225,085 hectares of land. Not all solar development will take place in England, nor will it all take place on agricultural land. However, if this were to happen then this would affect less than 3% of agricultural land in England.</p>
		Restoration of land	There is concern about the state of the farmland after the solar panels are removed in 40 years' time. Will the land be of suitable quality to be restored to agricultural use after these are removed.	N	<p>The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts.</p> <p>At decommissioning, the Scheme will be removed as set out in ES Vol 1 Chapter 2:</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>The Scheme [EN010141/DR/6.1] and the land will be handed back to the landowners, with the Applicant's leases ending. The Applicant cannot commit that following decommissioning the landowners would revert the land to arable farmland, however it is considered reasonably likely this would be the case. The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.</p>
		Visual impact, construction, wildlife, impact on countryside	The solar panels will seriously diminish the beautiful views in the area which are also enjoyed by the residents of Kimbolton and Stonely. It is also believed that the size of the proposed solar development and construction of the same will have an adverse impact on wildlife in the area.	N	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>The Applicant has undertaken an assessment of the Scheme on ecological receptors, as reported in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. This concludes there</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					would be no significant adverse effects on wildlife as a result of the Scheme.
		Construction, traffic, impact on local roads, workforce	The whole area around the proposed solar park has a rural road network. The parish council is concerned that the increased construction will have a major impact on the village and surrounding areas and that the roads are not suitable for large scale construction projects. The workforce for the project is also expected to be in the region of 800 and this will also greatly increase traffic in the area. The parish council require assurances that construction traffic does not pass through Kimbolton and Stonely and they would require this to be monitored as there is a weight limit in the village.	N	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Proposed Development through Little Staughton, Keysoe and Pertenhall.</p> <p>All construction traffic will be directed to the single Main Site Access junction off the B645 (referred to as SA16 in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]), which will provide access to the Main Construction Compound within Site D. From this location, a network of temporary access roads will be constructed across fields, in order to allow HGV access to Sites C, B and A while limiting the requirement for vehicles to use the public highway as far as practicable.</p> <p>The Applicant has prepared an outline Construction Traffic Management Plan [EN010141/DR/7.4] that sets out how traffic will be managed and monitored during the construction phase.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					Given that construction traffic is expected to approach the Proposed Development via the B645 Kimbolton Road from the A1 at Eaton Socon, construction traffic is not expected to pass through Kimbolton or Stonely.

Table 1.20: Little Staughton Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Scale, impact on local area, visual impact	It is our opinion that the scheme is too large and not in keeping with the rural setting of the area. The majority of the proposal will be visible from dwellings and well-established footpaths, bridleways and indeed the roads into and out of all the villages affected.	N	<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, reducing the visual impact of the Scheme at these locations, as set out in the Design Approach Document [EN010141/DR/5.6].</p>
		Government policy, loss of agricultural land	In terms of planning policy. The Government stated in August 2023 that renewable energy should be acceptable for their proposed location.	N	As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2] , the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>In terms of large scale solar it stated: “The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes”.</p> <p>The report goes on to state that planners will need to consider the following points:</p> <ol style="list-style-type: none"> I. Encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value. II. Where a proposal involves greenfield land, whether the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land. <p>The East Park application does not adhere to these points.</p> <p>The East Park proposal states that 74% of the land is classified as Best and Most Versatile. The Government’s consultation draft changes of the NPPF state: “We have been clear that food security is important for our national security, and that safeguarding BMV land is an important consideration.”</p>		<p>versatile’, where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant’s agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The Applicant has provided an assessment of the Scheme on Land and Soils in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p> <p>An outline Soil Management Plan [EN010141/DR/7.9] has been prepared which sets out how soils will be sensitively managed across the lifetime of the Scheme.</p> <p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK’s food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK’s food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government’s Food Security Report 2021, which stated that climate change and other environmental pressures like soil</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's domestic food production. This report also found that climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Proposed Development, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change.</p> <p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets. Using Solar Energy UK's estimate of six acres of land required per megawatt of solar power generated, meeting this target in full would require the use of 218,530 hectares of land, which is less than 1% of the UK's total land area. However, this figure does not take into account how the Government estimates that future solar developments will require less land per megawatt (MW) generated (the Proposed Development would require around three acres of land per MW). If, for example, all future developments required four acres per MW, then this would reduce the total amount of UK land required to around 0.6%.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					As of 2022, around 63.1% of land in England is in agricultural use. This amounts to 8,225,085 hectares of land. Not all solar development will take place in England, nor will it all take place on agricultural land. However, if this were to happen then this would affect less than 3% of agricultural land in England.
		Bedford Local Plan, loss of agricultural land, visual impact, loss of character	<p>The Bedford Local Plan 2030 contains the policies below:</p> <p>Policy 56 – identifies suitable locations for large scale solar energy developments, these being areas of lower quality agricultural land, existing built-up areas and other areas of previously developed land.</p> <p>Policy 57 – requires that impact must be fully addressed if a proposal is to be supported. These include the visual appearance and landscape character, local land use, social and economic impact, surface and ground water, the BMV land. The East Park proposal meets none of these.</p> <p>Policy 37 of the local plan requires that development proposals will protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Bedford Borough Landscape Character Assessment.</p>	N	<p>The Scheme is being determined primarily in accordance with the National Policy Statements for Energy (EN-1, EN-3, and EN-5). The Applicant has had regard to local plan policy within the Policy Compliance Document [EN010141/DR/5.4].</p> <p>An assessment of landscape impacts and effects is provided in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>Proposals will be required to protect and enhance the character and qualities of local landscape through appropriate design and management and to Safeguard and where possible, enhance key views and vistas.</p> <p>We do not feel that the East Park scheme reflects these policies</p>		
		Proximity to properties, impact on local businesses	<p>Several properties are surrounded by solar panels as part of this scheme. Not only will properties become significantly and detrimentally affected visually by the East Park scheme, two of these properties run businesses that deal exclusively with animals. The owners of both businesses have significant concerns, especially regarding the construction phase and the associated noise disruption and traffic movements that this will bring. We do not feel that is acceptable to put small businesses at significant financial risk due to their proximity to the scheme.</p>	Y	<p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, including at the locations mentioned within the Consultee's response. The design changes are set out in the Design Approach Document [EN010141/DR/5.6].</p>
		Traffic movements, construction, access	<p>We have concerns regarding the traffic movements during the construction phase of this scheme. East Park has stated this will take approximately 3 years to build and that there will be a total of 7,200 HGV deliveries made during this period. All access points will be reached via local roads which we feel will be damaged by such a large volume of traffic movements. We feel that the sheer volume of</p>	N	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>larger vehicles in conjunction with farm traffic could result in damage to the road surfaces and verges and could also lead to an increase in traffic collisions.</p> <p>This combined with a workforce of up to 850 people per day, will also have a significant effect in local country roads that have not been designed for large traffic movements.</p>		<p>associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>All construction traffic will be directed to the single Main Site Access junction off the B645 (referred to as SA16 in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]), which will provide access to the Main Construction Compound within Site D. From this location, a network of temporary access roads will be constructed across fields, in order to allow HGV access to Sites C, B and A while limiting the requirement for vehicles to use the public highway as far as practicable.</p> <p>As a result of the measures outlined above and in the outline Construction Traffic Management Plan [EN010141/DR/7.4], ES Vol 1 Chapter 5: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p>

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		Screening and planting	<p>We have concerns relating to the screening and planting of the scheme. East Park has stated that they will use saps, which will be planted once the construction phase has taken place. This means that there will be a minimum of 10 years from the start of construction before screening will begin to become effective.</p> <p>The scheme in Pertenhall that was completed some 8 years ago is still not screened satisfactorily despite the developer assuring the community that this would be done.</p> <p>What reassurances can be provided regarding the maintenance of the planting post build?</p>	N	<p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out how the landscape proposals will be implemented and managed for the lifetime of the Scheme. The Applicant is committing to having full-time land management staff on Site during operation to support the landscape maintenance of the Scheme.</p> <p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] includes proposed monitoring measures to ensure the aims and objectives of the plan are met.</p>
		Wildlife, local environment	<p>We feel that there will be a significant and negative impact on local wildlife from this scheme. Miles of high fencing is not going to enhance the environment for wildlife and the area is well populated by various mammals and a wide range of bird life including Sky Larks, lapwings and English Partridge, these particular birds are all classified in the UK as Red under the Birds of Conservation Concern.</p>	N	<p>The Applicant has undertaken an assessment of the potential impacts of the Scheme on wildlife through ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. This assessment concludes that the Scheme would not result in any significant adverse effects upon ecological receptors.</p> <p>Whilst short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage and otters is predicted during the construction phase, during the operational phase the Scheme is expected to result in a significant beneficial effect on priority habitats and on foraging</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>and commuting bats, along with beneficial (not significant) effects for other ecological receptors.</p> <p>ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] sets out that mammal gates will be provided in all solar fencelines at the detailed design stage to reduce the impact on habitat connectivity.</p>
		Flooding, water runoff, hazardous materials	<p>Flooding is a major concern, particularly through Pertenhall Brook and the River Kym. We would like some more clarification relating to the water runoff from the solar panels.</p> <p>Further to this point we also have concerns relating to the contamination run off from the solar panels. Solar cells contain a variety of materials that can be hazardous in certain concentrations and if they enter the drinking water supplies. This is a further concern for the wildlife who will ingest this water</p>	N	<p>The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]. This concludes that the Scheme will not increase flood risk off-site in any way.</p> <p>The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how surface water and the Scheme drainage will be managed throughout construction, operation and decommissioning.</p> <p>The Applicant notes the concern raised regarding the potential presence of hazardous materials in solar panels and battery energy storage systems (BESS). The specific technologies to be deployed will comply with all relevant UK and international standards.</p> <p>The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] and</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Waste Management Plan [EN010141/DR/7.12] that set out how materials will be handled, stored and disposed of in line with relevant regulations.
		Land selection, alternative locations	<p>We would request more information of how East Park has come to choose the land/layout they have submitted. There are other fields and farms that are positioned closer to the grid and indeed to other sites within the scheme. There appears to be land near sites C and D and which runs closer to the A1 on land that is not used as a public right of way.</p> <p>This land is already serviced by several hard standing tracks and some of these would have been used during the construction of the solar scheme currently running on Little Staughton airfield.</p> <p>Not only would the grid connection be much closer if this land were used for the scheme, but it would make the road traffic movements more manageable and traffic could be kept away from Little Staughton, Great Staughton and Pertenhall. If planned properly, using this site might mean that Site A could become redundant, and Site B drastically reduced in size.</p>	N	<p>The Applicant's approach to Site identification is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]. This report sets out the four stages that informed the Applicant's approach to site identification:</p> <ul style="list-style-type: none"> - Stage 1: Identification of the Area of Search; - Stage 2: Review of Brownfield and Previously Developed Land - Stage 3: The Exclusion of Land Covered by Planning, Environmental and Other Spatial Constraints; and - Stage 4, Factors influencing site selection. <p>The initial Area of Search included all land within 15km of the proposed connection point at Eaton Socon substation. Three Search Zones were subsequently identified:</p> <ul style="list-style-type: none"> - Zone A: Located either side of the A14 at the northernmost extent of

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					<p>the original Area of Search, to the north of Grafham Water;</p> <ul style="list-style-type: none"> - Zone B: Located across then north-west of the original Area of Search, to the south-west of Grafham Water; and - Zone C: Located to the east of the A1 between St Neots, Sandy and Potton in the south of the original Area of Search. <p>ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] concludes that, whilst there were no Search Zones that were not constrained in some way, that Zone B should be taken forward. This was due to Zone B being found as 'likely to have the most straightforward grid connection, which should in turn avoid and reduce environmental impacts, affect less landowners, and ensure that the Scheme remains commercially viable.'</p> <p>The Applicant's approach to land identification is then set out in ES Vol 2 Appendix 3-2 Land Identification Report [EN010141/DR/6.2]. This Report sets out the land offered by landowners for potential use as part of the Scheme. Given that this land totalled almost double that theoretically required for the Scheme, it also sets out the criteria the Applicant used to select which</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					land parcels to take forward as part of the Scheme.
		Solar panel replacement, environmental impact, disposal	Representatives of East Park mentioned that the solar panels will need to be replaced at some stage during the 40-year life of the site. We understand that the number of panels would be 'substantial' and so struggle to see how it can be classified as green and clean energy when the carbon footprint required to deliver the panels alone and project in general would be monstrous. We note that this will add to the local traffic issues, and we wonder how these solar panels will be disposed of in an environmentally friendly way?	N	<p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p> <p>The Applicant has provided an updated assessment of potential waste impacts in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>Waste will be managed in accordance with the outline Waste Management Plan [EN010141/DR/7.12], as well as the outline Construction Environmental Management Plan [EN010141/DR/7.3], outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					The Applicant notes the decision by the Secretary of State in determining the East Yorkshire Solar Farm DCO (ExA report ref 3.13.50 and 3.13.51) that although the capacity of facilities to handle decommissioned solar PV panels is still developing, the recycling industry is likely to respond to demand over time.
		Community grant proposal	The current offer of £2m, across all sites is derisory in light of the impact to the landscape and the local community. A number of parishioners have been made aware of the significant loss of value to their homes as a result of the scheme. There are also people who have concerns that they will not be able to move home, either through a job move, downsizing or illness due to the uncertainty this scheme has brought to the local area. We feel that there should be significant benefit to those who live here for the long term and suffer from the industrialisation of the rural area they have chosen to live in.	Y	At the 2024 statutory consultation, the Applicant set out three potential models for how community benefit could be delivered as part of the Proposed Development. Following the consultation, the Applicant subsequently announced its intention to deliver community benefit funding in excess of any of the options consulted on previously. The Applicant proposes community benefit funding at a rate of £400 per year per megawatt and will work with relevant stakeholders to determine a suitable delivery prior to operation.
		Decommissioning, return of land	It was noted at the Little Staughton consultation that East Park is not responsible for the “making good” of the land, back to productive arable land at the end of the project. This, we are led to believe will be the responsibility of the landowners.	N	The Applicant’s approach to decommissioning includes returning the land that forms the Scheme to a condition suitable for return to its original use after decommissioning, with the exception of areas of planting (woodland and hedgerows) that would be retained post-

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			We will be proposing a “significant” sum be placed in escrow to fund and ensure that this rectification does take place in 40 years’ time. It is our experience that these schemes will be “sold on” at some stage and quite probably more than once during the 40-year period so it is very important what is promised at the outset is actually carried out at the end.		decommissioning. The requirement of a decommissioning bond or some other assurance may arise during the planning process, although at this time the Applicant considers the legal requirements within the draft DCO [EN010141/DR/3.1] to be sufficient.
		BESS, mitigation, fire risk	Battery Storage – Up until this point there has been no mention of how this will be managed and how the risk of fire will be mitigated. It was reported during August 2023 that a Private Members Bill had been proposed by the MP for Basingstoke, Dame Maria Miller, calling for England’s fire and rescue services to be made statutory consultants in the planning applications for proposed industry lithium-ion battery storage facilities. During a House of Commons debate, she outlined the potential hazards of Battery Energy Storage Systems (BESS). In 2020 a 20 MWh BESS in Liverpool took over 11 hours to contain and resulted in an explosion and the release of toxic gasses. Given that this proposal is some 20 times that size, in the event of a fire explosion the damage could be extensive and far ranged with the toxic fumes/smoke.	N	The Applicant has prepared an outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10] as part of the application that sets out how the BESS will be managed safely across the lifetime of the Scheme. The oBSMP has been informed by the NFCC guidance.

Table 1.21: Ministry of Defence

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation, assets	<p>Thank you for consulting the Ministry of Defence (MOD) on the pre-application reference East Park Energy.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.</p> <p>I can confirm that, following review of the application documents, the proposed development falls outside of MOD safeguarded areas and does not affect other defence interests. The MOD, therefore, has no objection to the development proposed.</p>	N	The Applicant notes these comments.

Table 1.22: National Gas Transmission

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Deed of Grant of Easement, NGT Pipelines, construction	<p>NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.</p> <p>Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore, a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.</p> <p>Any large installations which may result in a large population increase in the vicinity of a high-pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review.</p>	N	The Applicant notes these requirements. The design and layout of the solar PV and ancillary infrastructure has had regard to the location, alignment and easements of all National Gas Transmission (NGT) infrastructure. Prior to the construction of works which may impact on any pipeline that is within the site boundary, a full survey of pipelines will be undertaken. This will include consultation with NGT. Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of NGT assets.
		Construction, pipelines, ground cover, pipeline safety	<p>NGT will need to ensure that its pipelines remain accessible during and after completion of the works.</p> <ul style="list-style-type: none"> • Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased. • If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any 	N	The Applicant notes these requirements. Prior to the construction of works which may impact on any pipeline that is within the site boundary, a full survey of pipelines will be undertaken to determine their location and depth and all measures will be implemented to avoid any pipelines. This will include consultation with NGT. Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of NGT assets.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.		
		Traffic, construction, access	<p>Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.</p> <p>Permanent road crossings will require a surface load calculation, and will require a deed of consent.</p> <p>The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.</p> <p>The type of raft shall be agreed with NGT prior to installation.</p> <p>No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT.</p> <p>NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.</p>	N	<p>The Applicant notes these comments. The locations of crossings are identified on ES Vol 3 Figure 2-3: Indicative Crossings Plan [EN010141/DR/6.3], and described in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p> <p>Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of NGT assets.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.		
		New asset crossings	<p>New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.</p> <p>The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.</p> <p>A new service should not be laid parallel within an easement strip.</p> <p>Clearance must be at least 600mm above or below the pipeline</p>	N	<p>The Applicant notes these comments. The locations of crossings are identified on ES Vol 3 Figure 2-3: Indicative Crossings Plan [EN010141/DR/6.3], and described in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p> <p>Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of NGT assets.</p>

Table 1.23: National Grid Electricity Transmission

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Existing and future NGET assets	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	N	The Applicant notes these comments. National Grid Electricity Transmission have been consulted and will continue to be consulted during the pre-application process and post submission process. Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of National Grid Electricity Transmission's assets.
		Safety clearances, electricity	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor.	N	The Applicant notes these comments. All statutory safety clearances will be maintained at all times by the principal

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		infrastructure, overhead lines	<p>National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”, which publicly available.</p> <p>If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines.</p> <p>Safe clearances for existing overhead lines must be maintained in all circumstances.</p>		<p>contractor who will be working on behalf of the Applicant during the construction of the Scheme, as set out in the outline Construction Environmental Management Plan [EN010141/DR/7.3].</p> <p>The Applicant will adhere to NGET guidance requirements for working within or under overhead lines. Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of National Grid Electricity Transmission's assets.</p>
		Construction, construction equipment	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.	N	The Applicant notes these comments. All statutory safety clearances will be maintained at all times by the principal contractor who will be working on behalf of the Applicant during the construction of the Scheme.
		Landscaping	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	N	All National Grid guidelines on planting would be followed where applicable.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Drilling and excavation	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”)	N	No drilling or excavation works will be undertaken if they have the potential to disrupt 'pillars of support' or foundations, and if drilling or excavation is to occur, reasonable measures will be undertaken to prevent impacts to the asset. Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of National Grid Electricity Transmission's assets.
		NGET underground cables	<p>National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.</p> <p>Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.</p>	N	The Applicant notes these comments. Protective provisions have been included in the draft DCO [EN010141/DR/3.1] for the protection of National Grid Electricity Transmission's assets. The Applicant will continue to engage with National Gid Electricity Transmission to agree appropriate protective provisions.

Table 1.24: National Highways

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Road capacity assessments, traffic	National Highways requests that junction capacity assessments are undertaken at any Strategic Road Network junctions that experience an increase of more than 30 vehicles in a peak hour. To avoid abortive work, the number of peak hour trips expected at each junction should be agreed with National Highways prior to undertaking the junction capacity assessments.	N	The forecast trip generation and distribution of vehicles is set out within ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] . This identifies that the Scheme is forecast to generation fewer than 30 vehicle movements during peak hours.

Table 1.25: NATS EN-Route Safeguarding

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation, assets	NATS operates no infrastructure within 10km of the proposal. As such, it anticipates no impact from the development, and has no comments to make on the application.	N	The Applicant notes these comments.

Table 1.26: Natural England

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation	Natural England have no further comments to make at this stage.	N	The Applicant notes this.

Table 1.27: Network Rail

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Impact on rail infrastructure	Since Brockwell Storage and Solar's proposal would involve a significant number of interactions with Network Rail's operational railway, it is strongly advised that Brockwell Storage and Solar take all potential areas of concern to Network Rail into account, in their documentation for consideration at planning. Therefore, it is imperative that Network Rail's Asset Protection team in the eastern region be consulted directly by Brockwell Storage and Solar, to ensure that all risks to our railway infrastructure are safely managed from all construction-related activities associated with your proposed development.	N	<p>The Applicant is not aware that the Scheme would interact with any Network Rail infrastructure. Network Rail do not own any land within the Order Limits for the Scheme, and the local construction routing towards the Site does not cross any railways.</p> <p>The Applicant is engaging with Network Rail on this matter.</p>
		Impact on rail infrastructure, mitigation, construction	<p>Network Rail would have an interest in understanding the full impact of Brockwell Storage and Solar's proposed development on all our infrastructure in the vicinity. This further understanding should identify improvements and/or mitigations required to facilitate Brockwell Storage and Solar's proposed development. As such, these will need to be funded by Brockwell Storage and Solar to ensure the safe and efficient running of our operational railway.</p> <p>A Basic Asset Protection Agreement or a Structures Agreement with Network Rail may be required before Brockwell Storage and Solar can proceed with any design or construction work alongside, above or below Network Rail's Infrastructure.</p>	N	<p>The Applicant is not aware that the Scheme would interact with any Network Rail infrastructure. Network Rail do not own any land within the Order Limits for the Scheme, and the local construction routing towards the Site does not cross any railways.</p> <p>The Applicant is engaging with Network Rail on this matter.</p>

Table 1.28: Northern Gas Networks

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Assets	Northern Gas Networks do not cover this area.	N	The Applicant notes this comment.

Table 1.29: North Northamptonshire Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation	<p>Thank you for your letter dated 24 September 2024, regarding 'East Park Energy.'</p> <p>I can confirm that having considered the proposal and the distance of the works from North Northamptonshire, the Council wishes to make no comments in respect of the statutory consultation.</p>	N	The Applicant notes these comments.

Table 1.30: Pertenhall and Swineshead Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Scale of proposed development	The scale of the development proposed between Swineshead and Hail Weston is overwhelming, particularly when the two existing sites and that separately applied for south of East Park Site D are included in the consideration.	N	<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, reducing the visual impact of the Scheme at these locations, as set out in the Design Approach Document [EN010141/DR/5.6].</p>
		Visual impact, Public Rights of Way	Our objection relates not only to the part of the proposed scheme that would lie in Pertenhall and Swineshead Parish, but to the whole proposal, large parts of which in adjoining parishes will be very visible from the dwellings	N	The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual

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			and well-used rights-of-way in the higher parts of this parish. The remaining two sites C and D further east will intrude on views from commonly used roads.		<p>[EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating ‘Green Lanes’: public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths

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					<p>open and preserve views, such as across the Kym Valley;</p> <ul style="list-style-type: none"> • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features.
		Landscape, loss of character, visual impact	The proposal will fundamentally change the very valued local landscape and settlement character of the area for much the worse. Highly valued local views would be destroyed. The six villages will no longer be small settlements sitting in attractive farmed	Y	The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] . This is accompanied by

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			countryside. In Little Staughton parish, two properties will be almost completely surrounded by panels.		<p>ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, including at locations around properties near Little Staughton. The design changes are set out in the Design Approach Document [EN010141/DR/5.6].</p>
		Consultation materials, mitigation and screening, visual impact	The Proposals map on page 9 of the Consultation Brochure indicates that not all of Site A in Pertenhall would be covered in solar panels. Some areas would be subject to “works to create, enhance and maintain the natural environment”. Similar promises were made ten years ago for the Manor Farm solar farm proposal. Local experience over what little has happened in this context on that site over the past ten years makes us have strong doubts about the delivery of this promise. The remainder of Site A would be covered by solar panels visible from the Pertenhall-Swineshead road and from public rights of way across and near the Site. We strongly believe that Site A should remain in agricultural use.	N	<p>The Applicant notes this comment.</p> <p>The layout of the Scheme within Site A is fixed by the Works Plan [EN010141/DR/2.3] and the landscape proposals at Appendix A of the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Government policy, local planning policy, loss of agricultural land	<p>The National Planning Policy Framework setting out the Government's planning policies for England is currently under review and the Government's response to their consultation is awaited. Because of its size, a decision will be made on this proposal by the Government on a recommendation by the Planning Inspectorate. The two local planning authorities, Bedford Borough and Huntingdonshire District, together with Cambridgeshire CC, will be simple consultees, like the parish councils. Nevertheless, Local Plan policies must be a material consideration in the appraisal process.</p> <p>The Government has published guidance, last updated in August 2023, to help local councils in developing policies for renewable and low carbon energy. This states that renewable energy developments should be acceptable for their proposed location. For particular planning considerations relating to large scale ground-mounted solar photovoltaic farms, it notes "The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes.....Particular factors a local planning authority will need to consider include:</p> <ul style="list-style-type: none"> - encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value; 	N	<p><u>Use of brownfield land</u></p> <p>In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land. However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own. This is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2].</p> <p><u>Use of agricultural land</u></p> <p>Further to this, and as set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p>

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			<p>- where a proposal involves greenfield land, whether the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land.”</p> <p>This current application does not comply with this guidance.</p> <p>The Government’s consultation draft changes to the National Planning Policy Framework contain the statement: “We have been clear that food security is important for our national security, and that safeguarding Best and Most Versatile agricultural land is an important consideration”. The Best and Most Versatile agricultural land is that classified in the Government’s Agricultural Land Classification as Grade 1, Grade 2 and Grade 3a land.</p> <p>East Park Energy’s Preliminary Environmental Information Report (para 6.10.4) states that 74.9% of their proposed development area lies within these categories.</p>		
		Local planning policy, loss of agricultural land	The Bedford Local Plan 2030, approved by Government process, contains Policies 56 and 57 relating to renewable energy. Policy 56 identifies suitable locations for large scale solar energy developments, these being areas of lower quality agricultural land, existing built-up areas and other areas of previously developed land. Areas of Grade 2 land are not included.	N	The Scheme is being determined primarily in accordance with the National Policy Statements for Energy (EN-1, EN-3, and EN-5). The Applicant has had regard to local plan policy within the Policy Compliance Document [EN010141/DR/5.4] .

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			<p>Policy 57 requires that a range of impacts have been fully addressed if a proposal is to be supported. These include the visual appearance and landscape character, local land use, social and economic impacts, surface and ground water, the best and most versatile agricultural land.</p> <p>The current proposal does not meet these requirements in any respect.</p>		
		Impact on local landscape and character	<p>Policy 37 of the Local Plan requires that development proposals will protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Bedford Borough Landscape Character Assessment May 2014 (updated January 2020). Proposals will be required, among other things, to:</p> <ul style="list-style-type: none"> • Protect and enhance the character and qualities of the local landscape through appropriate design and management. • Safeguard and where possible, enhance key views and vistas. <p>The proposed development within our parish lies within the Riseley Clay Farmland area of the Landscape Character Assessment. There are a range of landscape management guidelines set out for this, together with Development Guidelines including: "Conserve open views across the rural landscape which are vulnerable to change from large scale</p>	N	<p>The Scheme is being determined primarily in accordance with the National Policy Statements for Energy (EN-1, EN-3, and EN-5). The Applicant has had regard to local plan policy within the Policy Compliance Document [EN010141/DR/5.4].</p> <p>An assessment of landscape impacts and effects is provided in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p> <p>Consideration of how the Scheme will support the landscape guidelines in the area is provided in the Design Approach Document [EN010141/DR/5.6].</p>

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			<p>development including renewable energy and agri-industrial buildings. Ensure proposals for solar farms and associated infrastructure are appropriately integrated into this tranquil and rural setting.”</p> <p>The current proposal does not meet these requirements.</p>		
		Traffic, construction, site access	<p>We have great concern over the high levels of traffic that would be generated by the construction of this development. East Park Energy state that their proposal will take around three years to build. A total of 7,200 HGV deliveries would be made across the construction period. The primary access point would be on the busy B645 between Great Staughton and Hail Weston where the main construction compound would be sited, but this access point must first be reached via local roads.</p> <p>At their recent village hall consultation events, East Park staff have stated that at least once in the proposed 40-year life of the sites, the solar panels will need to be replaced. The local traffic implications of this are obviously worrying.</p>	N	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>All construction traffic will be directed to the single Main Site Access junction off the B645 (referred to as SA16 in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]), which will provide access to the Main Construction Compound within Site D. From this location, a network of temporary access roads will be constructed across fields, in order to allow HGV access to Sites C, B and A while limiting the requirement for vehicles to use the public highway as far as practicable.</p> <p>As a result of the measures outlined above and in the outline Construction Traffic</p>

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					<p>Management Plan [EN010141/DR/7.4], ES Vol 1 Chapter 5: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>
		Workforce traffic	With a stated workforce of 500-850 people, there will also be a significant volume of shift-based traffic. East Park Energy state that around 495 construction-related staff will require access to the site per day on average,	N	The outline CTMP [EN010141/DR/7.4] document has been submitted outlining the measures proposed to mitigate the transport impacts. A requirement of the draft DCO [EN010141/DR/3.1] secures that these

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			with a maximum of around 855 staff per day during peak activities. Assuming an average car/van occupancy of 2, this would equate to a maximum of approximately 780 daily two-way staff trips during the 10-month period of peak activity. Their routes to work are unknown but they will use many of the local roads		measures are developed in detail and complied with.
		Tranquillity, noise, vibration	As well as the disruption, noise, vibration, dust and vehicle and machinery fumes during the build programme, the developer states there will be what it describes as a “reduction in tranquillity”.	N	The Applicant notes this comment. The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] for the construction phase of the Scheme which contains measures that will be adopted to reduce disruption, noise, vibration, dust and vehicle and machinery fumes.
		Construction, disruption, wellbeing of residents	If and whenever your project is approved, local residents will then have to endure 3 years of construction disturbance before living with the results of your project for at least 40 years. Most of the 3500 local residents will not survive this period, of course, but your project is going to have, and already is having, a disturbing psychological effect on them. People are extremely worried about what it will mean for their way of life, their local environment and their properties. We have found no recognition of this from you in all the thousands of pages of material you have published. Why not?	N	The Applicant recognises that the development, construction and operation of infrastructure projects like the Scheme can cause stress and anxiety that may impact on people’s mental health. Whilst the Applicant is unable to action every request received to make changes to the proposals (including because of environmental or engineering constraints), it is committed to working with local communities. The Applicant has always sought to clearly communicate its plans and try to give certainty to those that have questions, whilst noting that the design development process has meant that some

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>details were unconfirmed during the pre-application stage.</p> <p>An assessment on human health is provided in Section 16.2 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p>
		Impact on local wildlife	<p>We are concerned about the likely impact of the proposed scheme on local wildlife. We note but are not convinced by the conclusions of Chapter 7 of the Preliminary Environmental Information Report and that further assessment will be completed prior to submission of the application. The miles of high fencing proposed is bound to have a significant effect on mammals in particular, including wild deer, and we are anxious to know how this issue is to be treated.</p>	N	<p>The Applicant has undertaken an assessment of the potential impacts of the Scheme on wildlife in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. This assessment concludes that the Scheme would not result in any significant adverse effects upon ecological receptors.</p> <p>Whilst short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage and otters is predicted during the construction phase, during the operational phase the Scheme is expected to result in a significant beneficial effect on priority habitats and on foraging and commuting bats, along with beneficial (not significant) effects for other ecological receptors.</p> <p>Mammal gates are proposed within all solar fencelines to minimise the impact on small mammals moving around the Site, as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					Landscape and Ecological Management Plan [EN010141/DR/7.7].
		Flood risk	We have concern about the probable increase in the risk of flooding along the Pertenhall Brook through East Park Site A and on eastward to its junction with the River Kim. The brook floods regularly after high rainfall, often blocking roads in Pertenhall. We fear that water runoff into the brook will be faster from the pattern of solar panels than from cultivated farmland, thus increasing flood risk.	N	<p>The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]. This concludes that the Scheme will not increase flood risk off-site in any way.</p> <p>The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how surface water and the Scheme drainage will be managed throughout construction, operation and decommissioning.</p>
		Public Rights of Way	We are concerned about the impact on public rights of way that run through the sites. East Part Energy state that the proposal is not expected to result in the loss of any public right of way but the nature of the footpaths and bridleways through the solar farms will be radically different and far less attractive to that experienced at present. It is very regrettable that East Park Energy has not yet prepared their Public Right of Way Management Plan and we note that they state that there are expected to be a limited number of temporary public right of way diversions during the construction phase.	N	An outline Public Rights of Way Management Plan [EN010141/DR/7.8] has been prepared as part of the application.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Decommissioning	We note that, should a Development Consent Order for the scheme ever be granted, the decommissioning phase is expected to begin no earlier than 2069 and last between 12-24 months. We strongly believe that a detailed Decommissioning Environmental Management Plan, to include secure funding arrangements, timescales and transportation methods must be prepared and submitted for discussion at Examination.	N	An outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] is included in the DCO application. Given that decommissioning would not take place until 2070 at the earliest, a detailed plan has not been prepared at this stage as it would not be able to take into account changes in policy and technology that would inform the plan – this approach is consistent with that taken by other solar DCOs. That said, the detailed plan will be required to be substantially in accordance with the outline plan.

Table 1.31: Peterborough City Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation, assets	<p>Thank you for the notification under Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>The proposed development lies some 25km of Peterborough, and as such, we do not have any comments on this proposal.</p>	N	The Applicant notes these comments. As a statutory consultee, if the application is accepted, Peterborough City Council will be contacted and be provided the opportunity to be an Interested Party and take part in the Examination.

Table 1.32: Southern Gas Networks

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation	Southern Gas Networks Plc is not the gas distribution network operator for the administrative area of Bedford Brough Council, Huntingdonshire District and Cambridgeshire County Council. Please redirect the attached correspondence to Cadent , the gas distribution network operator for the area.	N	The Applicant can confirm that it consulted Cadent as part of the 2024 statutory consultation.

Table 1.33: Staploe Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Size and scale, surrounding developments, cumulative impacts, impact on landscape	We are concerned about the size of the scheme – particularly in an area with so many existing solar schemes either in existence or at an advanced stage of assessment by planners. Top End and Little Staughton (existing), High Wood (proposed and awaiting planning consent), and Cobholden (proposed and awaiting planning consent). The cumulative effect on the landscape will be excessive. This clustering of solar farms around an electrical substation can transform the landscape of an area and should be avoided.	N	<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has assessed the impact of the Scheme alongside existing developments in the area within the Environmental Statement [EN010141/DR/6.1], and emerging developments within ES Vol 1 Chapter 17: Cumulative and Intra Project Effects [EN010141/DR/6.1]. This assessment concludes there would be no significant cumulative effects with other emerging developments in the locality.</p>
		Alternative locations, use of agricultural land	Insufficient evidence has been provided that the energy needs could not be delivered by fitting solar panels to roofs of domestic and commercial buildings. These should be considered before using agricultural land.	N	<p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					rooftop-mounted solar only would not be enough to meet the Government's targets.
		Food security, agricultural land	The scheme will use a high proportion of the best and most versatile agricultural land. Surely this is needed for our own food security. Importing food is not good for the environment. The extent of land (c. 768ha) being taken out of food production is huge.	N	<p>As set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK's food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK's food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government's Food Security Report 2021, which stated that climate change and other environmental pressures like soil degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's domestic food production. This report also found that</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Scheme, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change.</p> <p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets. Using Solar Energy UK's estimate of six acres of land required per megawatt of solar power generated, meeting this target in full would require the use of 218,530 hectares of land, which is less than 1% of the UK's total land area. However, this figure does not take into account how the Government estimates that future solar developments will require less land per megawatt (MW) generated (the Scheme would require around three acres of land per MW). If, for example, all future developments required four acres per MW, then this would reduce the total amount of UK land required to around 0.6%.</p> <p>As of 2022, around 63.1% of land in England is in agricultural use. This amounts to 8,225,085 hectares of land. Not all solar development will take place in England, nor will it all take place on agricultural land. However, if this were to</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>happen then this would affect less than 3% of agricultural land in England.</p> <p>An assessment of impacts on soil resources is provided at ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p>
		Land quality assessments	<p>We are concerned that agricultural land quality assessments are not sufficiently objective as the landowners pay for them and it is in their interests to achieve their desired outcome e.g. low quality classifications when wanting to develop the land and high when wanting to sell for agricultural purposes.</p> <p>We don't believe that the sampling was sufficient to make an accurate assessment of agricultural land quality. It was only 1 auger per 4 hectares. Natural England state that it should be 1 auger per hectare. Therefore it is not clear what the agricultural land classification is for the areas concerned.</p>	Y	<p>The agricultural land classification at ES Vol 2 Appendix 13-1 [EN010141/DR/6.2] was undertaken by Reading Agricultural Consultants, a professional company working to an established code of conduct.</p> <p>The Applicant has undertaken further agricultural land classification survey since the statutory consultation at a greater density than 1 in 4 hectares. This has been undertaken proportionately to increase the sampling density across the Site in relation to the likely nature of impacts.</p>
		Visual impact, access to countryside for recreation, Public Rights of Way	<p>One of the attractive aspects of our landscape are the wide open views. Walking or riding in a narrow corridor between solar panels does not make for a pleasant experience. The proposal does not specify the width of the corridors for rights of way.</p> <p>The view behind Little Staughton church down into the Kym valley is a particularly precious</p>	N	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2],</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			one in the area and should not be developed with solar panels.		<p>and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Photomontages from near Little Staughton Church are provided as part of the landscape and visual assessment, including from Viewpoint 51 on ES Vol 3 Figure 5-55 [EN010141/DR/6.3].</p> <p>The Scheme design includes buffers of 10m either side of public rights of way to create 20m wide corridors in which public rights of way will pass through the Scheme.</p>
		Landscaping, screening, maintenance	How would the landscaping be maintained? In our experience with the existing solar farm in our parish a lot of hedging was planted about 18 months after the solar farm was constructed and then most of the whips died due to lack of water and maintenance. They have then had to be replaced with took another year. Therefore we are now 4 years on with only tiny whips in place.	N	The Applicant notes this comment. The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out that three FTE roles will be required to manage the landscape proposals as part of the Scheme.
		Ancient woodland	We are concerned about the impact on the Ancient Woodland of High Wood (County Wildlife Site). It already has a solar farm to its west. One is proposed to its south and east (High Wood solar farm 22/01998/MAF at Bedford Borough Council) and now this proposal will create a solar farm close to its	N	<p>The Scheme will not directly impact on High Wood CWS. The Scheme has the potential to provide greater habitat connectivity between the woodland and other grassland, hedgerow and woodland habitats.</p> <p>An assessment of impacts on the designated and non-designated sites is provided in ES Vol</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			northern edge. It will be almost surrounded if all of these solar farms go ahead.		1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].
		Site access, cabling, construction, decommissioning	Your plans include a temporary access point in Duloe to lay the cables from site D (near Hail Weston) to Eaton Socon Substation SA17 and 18 access points on the road east of Duloe. We have been assured that these are temporary access points to be used for laying the cables during construction and for removing them during decommissioning. We have been told that the hedge will be reinstated and the track removed after the cables have been laid and the solar farm is in operation.	N	The Applicant notes this comment. The outline Construction Traffic Management Plan [EN010141/DR/7.4] sets out the construction access which will be used in the construction phase. ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] sets out in Table 2-33 the purpose of the access points.
		Impact on local roads, construction traffic, pedestrian access, safety, Public Rights of Way	<p>(relating to access points SA17 and SA18)</p> <p>The road is narrow and designated as unsuitable for HGVs so we don't think it is suitable for construction traffic.</p> <p>There is no pavement and the road is a well used route for pedestrians and cyclists. We are concerned about the safety of these vulnerable road users during laying of the cables.</p> <p>There is an existing solar farm behind Bassmead Manor which is in a similar location to site D. This did not require access to lay</p>	N	<p>Whilst our preliminary assessment indicates that the increase in HGV traffic between access points SA17 and SA18 would be more than 30%, this is a reflection of the low baseline of existing HGV flows across this link. In absolute terms, the total increase in HGVs crossing this link would be a maximum of 6 two-way movements per day.</p> <p>The outline Construction Traffic Management Plan [EN010141/DR/7.4] sets out how the Applicant proposes to manage traffic during the construction phase, whilst detail on how public rights of way will be managed is set out in</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>cables through Duloe. Why does this scheme require this access?</p> <p>There are a number of footpaths in the area of the proposed access points. How will walkers be protected from construction traffic?</p>		outline Public Rights of Way Management Plan [EN010141/DR/7.8].
		Hedgerows, screening, habitats and wildlife	<p>We would like to see a commitment to reinstating any hedges removed and removing any track and reverting to agricultural land immediately after construction and decommissioning with a timeframe in the planning conditions.</p> <p>Ensure all hedgerows are planted at the first opportunity following construction and well maintained (weeding, watering, replacement).</p> <p>Ensure there are sufficient habitat enhancements for breeding skylarks</p>	N	<p>Table 2-34 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] sets out the anticipated hedgerow removal and reinstatement timeframes as part of the Scheme. This corresponds to ES Vol 3 Figure 2-6 Indicative Vegetation Clearance [EN010141/DR/6.3].</p> <p>Hedgerows would be replanted in accordance with the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p> <p>Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat. Mitigation is set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>
		Soils quality, damage to land	Soils are living habitats. If they are kept in shade with no augmentation of organic material over a period of 40 years it could do	N	The Applicant has provided an assessment of the Scheme on Land and Soils in ES Vol 1

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			irreversible harm to the soil and make it difficult to return the land to agricultural production.		<p>Chapter 13: Land and Soils [EN010141/DR/6.1].</p> <p>An outline Soil Management Plan [EN010141/DR/7.9] has been prepared which sets out how soils will be sensitively managed across the lifetime of the Scheme.</p>
		East Park Legacy Fund, community benefit initiatives	<p>We do not believe that £2 million between 5 parishes is sufficient.</p> <p>Suitable projects might include a new community building (Village Hall in Duloe), improvements to our playing field eg. Improved drainage and new play equipment, new decking, average speed cameras, active travel routes eg. pavements / cycle paths. Subsidised electricity for residents.</p>	N	<p>At the 2024 statutory consultation, the Applicant set out three potential models for how community benefit could be delivered as part of the Scheme. Following the consultation, the Applicant subsequently announced its intention to deliver community benefit funding in excess of any of the options consulted on previously. The Applicant proposes community benefit funding at a rate of £400 per year per megawatt and will work with relevant stakeholders to determine a suitable delivery prior to operation.</p> <p>As the Scheme will connect directly into the electricity transmission network, it is not possible for local residents to benefit directly from the power generated by it. This is because the power will be moved around the network to suit demand. However, residents will benefit from the long-term benefits that will arise as part of the Scheme, including increased energy security as a result of reduced reliance on imported oil and gas from overseas .</p>

Table 1.34: UK Health Security Agency

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Environmental Health	We have considered the submitted documentation and can confirm that we are satisfied with the approach taken in preparing the Environmental Impact Assessment (EIA) and the conclusions drawn. We wish to make no further comment at this time.	N	The Applicant notes these comments.
		Landscape and visual impact, mitigation	<p>The report identifies residual significant visual effects for several individual residential properties. Although the report identifies proposed embedded mitigation it does not consider or assess the potential for more mature planting to assist in mitigating year 10 visual impacts.</p> <p>Recommendation: The ES should consider the use of more mature planting to further mitigate against visual effects at year 10 operational phase.</p>	N	The specification for proposed planting is set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Cumulative impacts, construction	<p>It should be noted that the region has a considerable number of infrastructure projects due to commence construction over the next 5 years. The cumulative effects from these schemes and local developments may impact on the availability of tourist accommodation and low costs rental sector accommodation.</p> <p>Recommendation: The cumulative effects assessment should consider the impacts from the</p>	N	<p>The cumulative effects of the Scheme with selected projects have been assessed in ES Vol 1 Chapter 17: Cumulative and Intra Project Effects [EN010141/DR/6.1].</p> <p>Consideration has been given to the availability of local visitor accommodation within ES Vol 1 Chapter 14: Socio</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			ingress of nonhome-based workers during the construction period, on the availability of local accommodation, including the affordable private rented sector.		<p>Economics, Land and Tourism [EN010141/DR/6.1].</p> <p>Using data obtained from CoStar (2025), the number of inventory rooms within a 30-minute drive time radius from the site is 9,094 and there are currently between 1,836 and 3,282 surplus rooms available, depending on the time of year.</p> <p>There would be no anticipated adverse effect on availability within the overall hotel, bed and breakfast, and inn accommodation sector arising from the Scheme, and it is anticipated that accommodation providers would be able to accommodate employees working at the Scheme without any adverse effects on the sector.</p>

APPENDIX 5-2 CONSULTATION REPORT APPENDIX 5- 2: REGARD HAD TO SECTION 42(1)(D) AND 47 RESPONSES [EN010141/DR/5.2]

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Scheme design				
Suggestion that the size of the Scheme should be reduced	<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Eaton Socon substation that forms the point of connection with the National Grid is a location with significant capacity to enable new electricity generation connections. The Applicant has secured a connection agreement with National Grid of up to 500 MW, comprising 400 MW of solar generation, and 100 MW of energy storage import and export. In the context of the national need for new renewable electricity generation, available capacity within the transmission and distribution network must be utilised, and the Applicant has therefore sought from the outset to maximise the capacity of the connection agreement. A 'less development' scenario that delivers a connection of less than 400 MW solar electricity generation and 100 MW energy storage has therefore not been pursued.</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, reducing the visual impact of the Scheme at these locations, as set out in the Design Approach Document [EN010141/DR/5.6].</p>	N	Y	Y
Suggestion that the amount of solar development in Site A should be reduced, including around Pentland House,	<p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations. This included increasing the distance between proposed solar development and Bridleway 37 in Site A, as set out in the Design Approach Document [EN010141/DR/5.6].</p>	Y	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Keysoe and between Brook End and Pertenhall				
Suggestion that the amount of solar development in Site B should be reduced, including around Lodge Farm and The Kangaroo	Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, including multiple locations in Site B, as set out in the Design Approach Document [EN010141/DR/5.6] .	Y	Y	N
Suggestion that the amount of solar development in Site C should be reduced	Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations. In Site C, this includes areas near Garden Farm and Staughton Manor, along with close to the Roman Small Town scheduled monument. More information can be found in the Design Approach Document [EN010141/DR/5.6] .	Y	Y	N
Suggestion that the amount of solar development in Site D should be reduced	Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, although this did not include any locations with Site D. More information can be found in the Design Approach Document [EN010141/DR/5.6] .	N	Y	N
Suggestion to route underground cables along existing roads/railways rather than through open fields	The Applicant's approach to underground cable routeing can be found in ES Vol 2 Appendix 3-6: Grid Connection Corridor Appraisal [EN010141/DR/6.2] . Due to the capacity of the cables and the need for cable jointing chambers, the construction corridor for the grid connection is expected to be up to 25 metres wide. As such, it would not be possible to provide a buried connection that followed roads or the public highways. Furthermore, there are no railways in the vicinity of the Scheme that underground cables could be routed alongside. Doing so would also require the agreement of Network Rail.	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Landscape and visual				
Impact of the Scheme on the landscape character / Concern regarding loss of scenery / Concern regarding damage to landscape / Impact of the Scheme on rural views from local residential areas	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; 	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<ul style="list-style-type: none"> • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features. 			
Statement that the solar farm will industrialise the local area	<p>The Applicant has considered the landscape character of the site and its relationship with nearby communities, roads and public rights of way, to identify the likely effects on the local landscape and visual amenity. ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] provides details on the assessment and proposed mitigations.</p> <p>As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The Applicant's approach to land identification is then set out in ES Vol 2 Appendix 3-2 Land Identification Report [EN010141/DR/6.2]. This Report sets out the land offered by landowners for potential use as part of the Scheme. Given that this land totalled almost double that theoretically required for the Scheme, it also sets out the criteria the Applicant used to select which land parcels to take forward as part of the Scheme.</p>	N	Y	Y
Suggestion that agrovoltaics could form part of the Scheme	<p>The Applicant is keen to explore the potential for 'agrovoltaics' within the UK and has therefore partnered with Rothamsted Research ('Rothamsted'), a specialist agricultural research centre, to undertake scientific research on co-locating agricultural production with solar generation. To enable this research, the Applicant has identified a specific area within Site D where Rothamsted can develop research projects alongside the Applicant. This is sited in close proximity to the storage, operations and maintenance building with the benefit of being able to access and manage the Agrisolar research area easily. The</p>	Y	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	'Agrisolar Research Area' is described in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] .			
Statement that the Scheme will not look like the visualisations provided during the consultation	<p>The assessment of the effects on specific visual receptors is underpinned by a detailed assessment of the visual effects of the Scheme at selected representative viewpoints. These representative viewpoints and their associated visualisations provide a detailed insight into the anticipated appearance of the visual effects likely to occur as a result of the Scheme in specific locations.</p> <p>These are produced by visualisation specialists following the methodology and criteria based on the non-prescriptive Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3), and the Landscape Institute's guidance on Visualisation of Development Proposals.</p> <p>More detail can be found in ES Vol 2 Appendix 5-2: ZTV and Visualisation Methodology [EN010141/DR/6.2].</p>	N	Y	Y
Impact of site security lighting on the landscape and character of the area	<p>During the construction phase, lighting towers would be required during the winter months at each of the construction compounds. There may also be a requirement for mobile task lighting at some of the construction locations e.g. solar transformer units, BESS compound and East Park Substation compound. Lighting would generally not be operated for longer than one hour either side of the specified construction working hours. Lighting would utilise directional fittings to minimise outward light spill and glare. Measures to control light pollution are documented within the outline Construction Environmental Management Plan [EN010141/DR/7.3].</p> <p>During the operational phase, lighting would be provided at the BESS / substation / storage area for security purposes and for maintenance undertaken in periods of low light. The lighting would not be switched on routinely and would be operated using infrared motion detectors or switched on manually for maintenance purposes. Lighting would be managed in accordance with the outline Operational Environmental Management Plan [EN010141/DR/7.5].</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>CCTV cameras placed around the solar arrays would utilise infrared at night, and would not include lighting.</p> <p>The application is supported by ES Vol 1 Chapter 5 Landscape and Visual [EN010141/DR/6.1] which includes the assessment of lighting impacts on landscape character.</p>			
<p>Concern that the Scheme will increase light pollution / Concern regarding light pollution on dark skies</p>	<p>The construction and operational lighting associated with the Scheme will be restricted and designed sensitively with the environment in mind, meaning that it is unlikely to pose an issue.</p> <p>During the construction phase, temporary mobile lighting towers will likely be required during winter at each of the construction compounds. Lighting will be operated to minimise impacts on human and ecological receptors, and generally not be operated for longer than one hour either side of the specified construction working hours. All lighting will utilise directional fittings to minimise outward light spill and glare.</p> <p>During the operational phase the Scheme will not be routinely lit at night.</p> <p>The application is supported by ES Vol 1 Chapter 5 Landscape and Visual [EN010141/DR/6.1] which includes the assessment of lighting impacts on landscape character.</p>	N	Y	N
<p>Concern regarding the size and scale of the Scheme and the visual impact of the Scheme in a rural area</p>	<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p>	Y	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, reducing the visual impact of the Scheme at these locations, as set out in the Design Approach Document [EN010141/DR/5.6].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features. 			

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Suggestion that the cabling between the areas of solar development and Eaton Socon substation should be undergrounded, and that pylons should not be used	The Applicant is not proposing to build any pylons as part of the Scheme, and can confirm that all cabling between the proposed solar development and grid connection at Eaton Socon substation would be via underground cables. More information can be found in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] .	N	Y	N
Query regarding height of solar panels	The maximum height at the top of the solar panels is proposed to be 3 metres above existing ground levels, whilst the minimum height at the bottom of the solar panels would be 0.8 metres above existing ground levels. This is secured by the Design Parameters and Principles Statement [EN010141/DR/7.1] .	N	Y	Y
Mitigation and screening will not be sufficient due to the height of the battery storage facility and solar panels	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>The landscape mitigation is secured by the illustrative landscape proposals at Appendix A of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the oLEMP [EN010141/DR/7.7]. This ensures the proposed landscaping is successful in establishing and can be relied on as embedded mitigation for the Landscape and Visual impact Assessment.</p> <p>Whilst the proposed mitigation would be successful in screening the Scheme in the majority of views, there would still be views where the Scheme would remain visible in the long-term. These are identified as part of the assessment of effects undertaken in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding the size and height of batteries and storage facility	<p>The BESS would be located in a single compound that includes battery storage containers and transformers, control equipment, and water storage tanks. The Substation and BESS components of the Scheme would contribute to a slight increase in landscape change within the vicinity of East Park Site D given their taller vertical scale than the solar array. However, these components would be set within the wider solar array, which would partially reduce their influence on the character area.</p> <p>Visualisations which accurately depict the maximum height and scale of the BESS are available as part of the supporting figures to ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>	N	Y	Y
Statement that it will not be possible to visually mitigate a Scheme of this size	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Whilst the proposed mitigation would be successful in screening the Scheme in the majority of views, there would still be views where the Scheme would remain visible in the long-term. These are identified as part of the assessment of effects undertaken in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>	N	Y	Y
Mitigation and screening in the form of planting will take several years to reach the necessary height	<p>The assessment of landscape and visual impacts at the operational phase is undertaken for the opening year of operation, immediately following completion of construction, ('Year 0') and for the tenth year of operation ('Year 10'). This allows the assessment to take account of the proposed planting that would be implemented as part of the Scheme, which by Year 10 should be established and of a sufficient height that it would be effective in providing visual screening.</p> <p>For the purpose of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1], mitigation planting growth and height assumptions have been defined in Table 5.5. The</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>figures set out in Table 5.5 are based on experience of the competent expert and colleagues, including previous DCO and public inquiry experience. They are reasonable estimates of growth rates which are subject to the variables of ground conditions, general climatic influences and individual species growth rates. These heights have been used to show the vegetation on the year 0 and year 10 photomontage visualisations presented as part of the landscape and visual assessment.</p> <p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out that three FTE roles will be required to manage the landscape proposals as part of the Scheme.</p>			
Suggestion to undertake landscape planting ahead of construction	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out how the specification for the landscaping proposals, along with how they will be implemented. The proposed landscaping will be completed prior to the end of the construction phase and the first full year of operation.	N	Y	Y
Suggestion that any trees planted as part of the Scheme should meet a minimum height requirement (such as 20% being higher than 3 metres) and that this should be secured by a DCO condition	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out the Applicant's suggested approach to tree planting as part of the Scheme. Where Native Species Individual Tree Planting is proposed, it is expected that this will comprise heavy standard trees with a stem girth of between 12-14cm and a height of at least 350cm,	Y	Y	N
Concern regarding the visual impact on historic sites / Statement that the Scheme will eliminate protected views from heritage sites	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 6 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>This assessment established that the operational phase of the Scheme would also have a significant effect (in EIA terms) upon the settings of the following heritage assets:</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<ul style="list-style-type: none"> A non-designated possible moated site within the north-western corner of East Park Site D <p>The Scheme will nonetheless be visible in the setting of other heritage assets, and this has informed the mitigation proposals for the design and layout of the Scheme as set out in Section 6.7 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1], and described in the Design Approach Document [EN010141/DR/5.6].</p>			
Statement that the Scheme will disrupt views from, and of, Little Staughton Church	<p>The Applicant has sought from the outset of the project to avoid and minimise impacts on the church at Little Staughton, and the other churches in the wider area. This included work at the site selection and land identification stages of the project, as set out in the Design Approach Document (DAD) [EN010141/DR/5.6]. In particular, as set out under Design Principle 2.1 in Section 5.6 of the DAD, the Applicant has sought to minimise impacts on views towards the church spires from within the landscape.</p> <p>The Applicant has assessed the visual impact of the Scheme from churches including the church at Little Staughton within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. Photomontage visualisations have been prepared from close to the church at Viewpoints 51 and 54 as presented within the figures supporting ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] which are submitted in ES Volume 3 [EN010141/DR/6.3]. The assessment concludes that views from the church itself towards the Scheme will be limited by the vegetation around the churchyard, with views only available from gaps in the hedgerow. Outside of the churchyard, there would be significant effects from the public footpaths due to the elevation and change in views out across the Site.</p> <p>The Applicant has assessed the impact on the historic setting of the church at Little Staughton within ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] and concluded that there would be a significant effect during construction due to the movement and operation of plant and machinery across the Site, including in open fields to the north-east of the church. Once operational the Scheme</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	would be more transient in the wider setting of the church, and the assessment concludes that in terms of setting impacts, the effect would reduce to not significant.			
Suggestion that bunding should be used to help screen views of the Scheme	The Applicant is not proposing the use of bunding to visually screen the Scheme, as bunding itself is generally unnatural in form and can appear starkly out of context in a rural landscape. Instead, the Applicant is proposing native species planting to screen views of the Scheme, as set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .	N	Y	N
Support for screening and mitigation of the Scheme near residential areas and Public Rights of Way	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.1] shows the proposed solar areas, screening and environmental mitigation. The Masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; 	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<ul style="list-style-type: none"> • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features. <p>The landscape mitigation is secured by the illustrative landscape proposals at Appendix A of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the oLEMP [EN010141/DR/7.7]. This ensures the proposed landscaping is successful in establishing and can be relied on as embedded mitigation for the Landscape and Visual impact Assessment.</p>			
Concern regarding visual impact for footpath users	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>The Applicant is proposing a number of measures to mitigate the visual impacts of the proposals, including the creation of 'Green Lanes' where public rights of way are set within open 20 metre wide corridors bounded by hedgerows and woodland blocks for visual screening, landscape integration, and habitat connectivity purposes.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>The Applicant is also incorporating the sensitive design of landscape treatment along public rights of way on more elevated ground, such as west of Little Staughton, to ensure footpaths are not enclosed by vegetation and that intermittent views out across the Kym Valley to the north are available.</p> <p>The approach to design is set out in the Design Approach Document [EN010141/DR/5.6].</p>			
Concern regarding visual impact of fencing / Suggestion that hedgerows could be used in place of fencing	<p>The Scheme will incorporate fencing for security and safety reasons. The fencing will be suited to a rural context, comprising either deer fencing (timber posts and metal stock fencing), or green paladin fencing. Vehicle gates will be provided to each fenced area to allow operational and maintenance access.</p> <p>The Scheme incorporates landscaping and planting to soften the proposals and mitigate visual impacts. ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the fencing and planting proposed.</p> <p>The visual impact of fencing has been considered as part of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>	N	Y	Y
Statement that green spaces should be preserved / Statement that open countryside should be protected from development	<p>The site selection, scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.1] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; 	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<ul style="list-style-type: none"> • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features. 			
<p>Suggestion that larger buffer zones are required between properties and panels /</p> <p>Suggestion that a specified buffer zone size (75m, 100m, 200, 300m or 750m) should be applied between areas of solar development and roads/properties / Statement that there is not enough buffer proposed</p>	<p>The Applicant has not assigned a standard buffer to all properties, instead applying suitable offsets based on topography, existing vegetation, and property aspect to set offsets to the Scheme.</p> <p>Since the 2024 statutory consultation the Applicant has taken on board feedback in relation to a number of properties, including north of Little Staughton, and adjusted the development area to reduce impact.</p> <p>An assessment of visual effects for residential receptors is provided in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. In addition, the Applicant has undertaken a specific residential amenity assessment in ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2] in accordance with Landscape Institute guidance on residential amenity assessment. This assessment concludes that there are no properties where the residential visual amenity threshold would be exceeded.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Battery Energy Storage System (BESS)				
Concern regarding fire risk / explosion associated with BESS	<p>The BESS would include cooling systems which are designed to regulate temperatures to within safe conditions to minimise the risk of fire. The units would also contain fire detection and suppression systems.</p> <p>In developing the proposals, the Applicant has followed guidance published by the National Fire Chiefs Council regarding the design and layout of BESS infrastructure, which includes a recommendation that an on-site water supply is provided in the event of a fire.</p> <p>The Applicant held initial discussions with Cambridgeshire Fire and Rescue Service, as a result of which the Applicant is proposing two water storage tanks with a minimum capacity of 228,000 litres of water each as part of the BESS infrastructure.</p> <p>The Fire and Rescue Service are amongst a range of consultees the Applicant sought feedback from during the consultation.</p> <p>The Applicant has also consulted the Health and Safety Executive on the Scheme. The construction, operation and decommissioning of the Scheme are not considered to have a risk of major accidents or disasters that could affect existing or future receptors, which are not considered through existing design mitigation and regulatory regimes.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire service.</p>	N	Y	Y
Concern regarding toxic fumes associated with BESS	<p>The Applicant has prepared an air quality assessment of unplanned emissions from an accidental Battery Energy Storage System (BESS) fire during the operation and maintenance of the Scheme has been undertaken. This is provided as an appendix to the outline Battery Safety Management Plan (oBSMP) [EN010141/DR/7.10].</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>The assessment has been undertaken using an atmospheric dispersion model to determine the determine the likely effects on human health from a potential BESS fire. The assessment concludes that based on the factors of distance to the nearest locations of human exposure and the anticipated short-term nature of a fire incident, there would be no significant air quality effects as a result of a BESS fire incident.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire service.</p>			
Concern regarding safety related to lithium batteries	<p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire service.</p>	N	Y	Y
Suggestion that BESS should not be located near residential areas / Concern that there are health risks associated with living near battery storage facilities	<p>To reduce effects on visual amenity, opportunities have been sought to incorporate buffers between project infrastructure and nearby homes and villages, as well as new planting, where appropriate, to further screen views.</p> <p>The BESS is proposed to be located in Site D. The closest residential receptor is 478 metres from the BESS area, the closest PROW is 123 metres, and the closest road section is 557 metres.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire service. It draws on a plume study which concludes that that there is no impact due to toxic gas or visibility impairment on any sensitive receptor in the proximity of the proposed BESS area, arising from a reasonable worst-case (BESS Unit) fire.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Visual impact associated with BESS and the impact on rural areas / Suggestion that batteries should be hidden from view where possible	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>The Applicant consulted on two locations for the BESS at the statutory consultation, one option being in Site C, and the other in Site D. The environmental assessment work and feedback from consultation led to a decision that the BESS would be located in Site D. This is set out in Section 3.5 of ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1].</p>	N	Y	Y
Concern regarding the safety of storing electricity	<p>The Applicant has consulted the Health and Safety Executive on the Scheme. The construction, operation and decommissioning of the Scheme are not considered to have a risk of major accidents or disasters that could affect existing or future receptors, which are not considered through existing design mitigation and regulatory regimes.</p> <p>By implementing recognised and approved safety legislation and regulation, no significant effects in relation to major accidents and disasters are anticipated during the construction, operation and decommissioning phases.</p>	N	Y	Y
Concern regarding site access to the battery storage facility / Suggestion that the developer should consider emergency access	The Applicant has included a secondary route to access the BESS facility, as set out in the outline Battery Safety Management Plan [EN010141/DR/7.10] .	Y	Y	N
Statement that BESS is not environmentally friendly	Battery storage is an integral component of renewable energy technologies recognised in Government strategies, storing excess energy during periods of peak generation or low demand and releasing it during peak demand or in case of power outages. This safe and	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>proven technology would support the Scheme to generate a consistent and reliable renewably generated power supply, even when the sun is not shining.</p> <p>The Applicant has assessed the embedded carbon emissions in the BESS within ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [EN010141/DR/6.2].</p>			
Suggestion to relocate the battery storage facility to Eaton Socon	<p>The project's grid connection arrangement is at 400 kV. In contrast, the BESS equipment (and solar equipment) operates at 33 kV and below. This means that a 400 kV substation is required to step down the voltage. If the BESS were to be located at Eaton Socon, the 400 kV transformation would need to occur here also. This would involve running numerous 33 kV circuits more than 6 km to connect the solar element of the scheme. This is extremely inefficient and costly compared with a 400 kV circuit and therefore, the 400 kV substation and BESS need to be located close to the solar fields.</p>	N	Y	Y
Concern that a potential fire at the battery storage facility would impact local wildlife and wooded areas	<p>The BESS would include cooling systems which are designed to regulate temperatures to within safe conditions to minimise the risk of fire. The units would also contain fire detection and suppression systems.</p> <p>In developing the proposals, the Applicant has followed guidance published by the National Fire Chiefs Council regarding the design and layout of BESS infrastructure, which includes a recommendation that an on-site water supply is provided in the event of a fire.</p> <p>The Applicant held initial discussions with Cambridgeshire Fire and Rescue Service, as a result of which the Applicant is proposing two water storage tanks with a minimum capacity of 228,000 litres of water each as part of the BESS infrastructure.</p> <p>The Fire and Rescue Service are amongst a range of consultees the Applicant sought feedback from during the consultation.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire service.			
Local infrastructure is inefficient to support the battery storage facility Local fire stations may not have capacity or training to manage the risks associated with BESS	<p>The Fire and Rescue Service are amongst a range of consultees the Applicant sought feedback from during the consultation.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been produced as part of the application for development consent. This plan outlines the procedures proposed to be followed regarding battery safety and the final version of this plan will be approved by the Local Planning Authority in consultation with the local fire service.</p>	N	Y	Y
Suggestion that BESS should be located away from the Roman Small Town and other existing or potential heritage sites	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 6 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>At the 2024 statutory consultation, the Applicant presented two options for where a BESS and internal substation could be located – Site C (Option 1) and Site D (Option 2).</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	Of the two options, Option 2 was the preferred option in consultation feedback. It is also more easily accessible from the local road network and further away from the Roman Small Town in Site C. The BESS and internal substation will therefore be located in Site D, whilst at Site C the Applicant proposes solar development in place of BESS Option 1. This is set out in Section 3.5 of ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1] .			
Suggestion that the BESS should be located outside the flood risk zones	<p>At the 2024 statutory consultation, the Applicant presented two options for where a BESS and internal substation could be located – Site C (Option 1) and Site D (Option 2). Neither of these locations are within a Fluvial Flood Zone, whilst small parts of Options 1 and 2 are situated within areas with a 0.1% Annual Exceedance Probability of Pluvial Flooding.</p> <p>Of the two options, Option 2 was the preferred option in consultation feedback. The BESS and internal substation will therefore be located in Site D, whilst at Site C the Applicant proposes solar development in place of BESS Option 1. This is set out in Section 3.5 of ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]. To manage the existing pluvial flood risk, the Applicant is proposing Wing at the perimeter of the BESS compound. More information can be found in ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2].</p>	N	Y	N
Suggestion that, if BESS location Option 1 is progressed, it should be screened from all sides and not rely just on the existing screening that would be provided by New Wood	<p>At the 2024 statutory consultation, the Applicant presented two options for where a BESS and internal substation could be located – Site C (Option 1) and Site D (Option 2).</p> <p>Of the two options, Option 2 was the preferred option in consultation feedback. The BESS and internal substation will therefore be located in Site D, whilst at Site C the Applicant proposes solar development in place of BESS Option 1. This is set out in Section 3.5 of ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1].</p>	N	Y	N
Statement of preference for BESS location Option 2	At the 2024 statutory consultation, the Applicant presented two options for where a BESS and internal substation could be located – Site C (Option 1) and Site D (Option 2).	Y	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	Of the two options, Option 2 was the preferred option in consultation feedback. The BESS and internal substation will therefore be located in Site D, whilst at Site C the Applicant proposes solar development in place of BESS Option 1. This is set out in Section 3.5 of ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1] .			
Agriculture and soils				
Concern regarding the loss of agricultural land / Concern regarding the land being best and most versatile land / Statement that best and most versatile land should not be used or that the amount of this land required should be produced	<p>As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The Applicant has provided an assessment of the Scheme on Land and Soils in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p> <p>An outline Soil Management Plan [EN010141/DR/7.9] has been prepared which sets out how soils will be sensitively managed across the lifetime of the Scheme.</p>	N	Y	Y
Disagree with the land classification	<p>Guidance for assessing the quality of agricultural land in England and Wales is set out in the Ministry of Agriculture, Fisheries and Food (MAFF) revised guidelines and criteria for grading the quality of agricultural land, and summarised in Natural England's Technical Information Note (TIN) 0492.</p> <p>The agricultural land classification at ES Vol 2 Appendix 13-1 [EN010141/DR/6.2] was undertaken by Reading Agricultural Consultants, a professional company working to an established code of conduct.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	The Applicant has undertaken further agricultural land classification survey since the statutory consultation at a greater density than 1 in 4 hectares. This has been undertaken proportionately to increase the sampling density across the Site in relation to the likely nature of impacts. ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] provides more information on the agricultural land survey.			
Statement that other nearby solar farm developments used a lower percentage of best and most versatile land	<p>As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>The Applicant has provided an assessment of the Scheme on Land and Soils in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p>	N	Y	N
Concern regarding food security / Statement that the Scheme would impact national food security	<p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK's food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK's food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government's Food Security Report 2021, which stated that climate change and other environmental pressures like soil degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's domestic food production. This report also found that climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Scheme, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change.</p> <p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>Using Solar Energy UK's estimate of six acres of land required per megawatt of solar power generated, meeting this target in full would require the use of 218,530 hectares of land, which is less than 1% of the UK's total land area. However, this figure does not take into account how the Government estimates that future solar developments will require less land per megawatt (MW) generated (the Scheme would require around three acres of land per MW). If, for example, all future developments required four acres per MW, then this would reduce the total amount of UK land required to around 0.6%.</p> <p>As of 2022, around 63.1% of land in England is in agricultural use. This amounts to 8,225,085 hectares of land. Not all solar development will take place in England, nor will it all take place on agricultural land. However, if this were to happen then this would affect less than 3% of agricultural land in England.</p>			
Concern that the Scheme will permanently damage high quality agricultural land / Concern regarding degradation of soil quality	<p>The Scheme will take agricultural land out of arable use and transition to grassland, as shown on the ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] and set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7]. This would have a benefit in carbon sequestration and soil recovery in the long-term and deliver multiple ecosystem services during the operational phase of the Scheme.</p> <p>The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts. The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.</p> <p>An assessment of impacts on soil resources is provided at ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p>	N	Y	Y
Statement that the land will not return to its original state after decommissioning	<p>The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	At decommissioning, the Scheme will be removed as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the land will be handed back to the landowners, with the Applicant's leases ending. The Applicant cannot commit that following decommissioning the landowners would revert the land to arable farmland, however it is considered reasonably likely this would be the case. The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.			
Statement that the construction process will involve soil compaction, impacting long term soil fertility and its ability to retain water	The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out how soils will be handled and managed across the lifetime of the Scheme to avoid and minimise any impacts.	N	Y	Y
Traffic and transport				
Concern regarding the possible use of the B645 ,B660 and Great Staughton road for construction traffic	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>All heavy goods vehicle (HGV) traffic and the majority of daily staff movements would arrive to work via the main access from the B645 into Site D. Once vehicles arrive in Site D, a temporary access road will connect westward across fields to Site C, avoiding the use of Moor Road.</p> <p>From Site C to Site B, access will be via an existing access to Great Staughton Road, avoiding large volumes of traffic from passing through Great Staughton. From Site B to Site A, vehicles would travel along the public highway from the B660 for a short section before accessing Site A using an existing access at Manor Farm.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>As a result of the measures outlined above and in the development consent order application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the DCO application.</p>			
Suggestion that all construction traffic should travel through the Scheme without utilising the local road network, as suggested at the non-statutory consultation	<p>At the non-statutory consultation the Applicant did not present detailed plans for how construction traffic would access the Site and working area. In developing its proposals, the Applicant has sought to avoid using the local road network for the construction phase where it has been possible to do so, however, at all stages of pre-application consultation the Applicant has expected to use the local road network to construct the Scheme.</p> <p>The construction access strategy and associated control and mitigation measures are set out in the outline Construction Traffic Management Plan [EN010141/DR/7.4].</p>	N	Y	N
Concerns regarding pedestrian and cyclist safety	<p>Safety for local communities is a key priority for the Applicant during the construction, operation and decommissioning of the Scheme.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has also been produced as part of the application.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Statement that Moor Road is not suitable for HGVs and commercial traffic during construction	<p>All heavy goods vehicle (HGV) traffic and the majority of daily staff movements would arrive to work via the main access from the B645 into Site D. Once vehicles arrive in Site D, a temporary access road will connect westward across fields to Site C, avoiding the use of Moor Road.</p> <p>As a result of the measures outlined above and in the development consent order application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the application.</p>	N	Y	N
Statement that local roads cannot support construction traffic and heavy vehicles	<p>ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the application.</p>	N	Y	Y
Statement that construction traffic will cause significant disruption to local residents / Concern regarding management of traffic / Statement that construction traffic will have a negative impact on health and wellbeing	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>As a result of the measures outlined above and in the development consent order application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the application.</p> <p>The potential health impacts of the Scheme are set out in Section 16.2 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p>			
Concern regarding impact of construction traffic on school bus routes	An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the application that sets out how construction traffic will be managed across the construction phase.	N	Y	N
Query regarding how the proposal will affect bus stops adjacent to access point SA09	Consideration of impacts on local bus routes is set out in ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] . The Applicant will ensure that the bus stop is available at all times.	N	Y	N
Concerns regarding child safety during the construction period	Safety for local communities, construction workers and local wildlife is a key priority for the Applicant during the construction, operation and decommissioning of the Scheme. An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been developed as part of the application to outline how construction activities will be managed throughout the construction process. This also outlines the measures to control the delivery of materials and staff onto the Site during the construction phase of the Scheme.	N	Y	Y
Air quality				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Statement that construction will lead to increased air pollution	<p>The construction process and particularly the construction of trenches for cables and the movement of vehicles do have the potential to give rise to airborne dust. These will be mitigated by the incorporation of standard dust mitigation measures in the outline Construction Environmental Management Plan [EN010141/DR/7.3].</p> <p>The Scheme would result in the generation of additional HGV and Light Delivery Vehicles (LDV) movements on the local road network. However, based on the available local air quality information and review of the expected construction phase traffic numbers and their routing, the significance of residual effects associated with vehicle exhaust emissions are also assessed as not significant.</p> <p>More information is covered in the ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1].</p>	N	Y	N
Noise and vibration				
Statement that construction traffic will lead to increased noise pollution	<p>The Applicant has undertaken a noise and vibration assessment, based on detailed measurements of current background noise levels across the project area.</p> <p>This assessment identified noise sensitive receptors (such as people's homes), and the Applicant has modelled the noise impact of the proposals on these receptors based on worst-case scenarios.</p> <p>Based on modelling, the Applicant will put in place noise limits at locations in close proximity to people's homes, to ensure that no significant effects would occur as a consequence of the proposals. Where appropriate, the Applicant will employ measures such as screening to mitigate any noisy works. Additionally, the Applicant is not proposing to undertake any construction works on Sundays or bank holidays.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the DCO application, and the outline Construction Environmental Management Plan [EN010141/DR/7.3] sets out measures to mitigate noise impacts during construction.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding noise pollution from BESS	<p>Once operational the Scheme will include components that would generate varying levels of noise. These include the BESS, inverters, transformers and switchgear.</p> <p>The operational phase assessment has considered the effect of plant operation, vehicle movements and any vibration at the nearest noise sensitive receptors during daytime and nighttime periods. Whilst the assessment confirms that some residential properties would experience a degree of noise (based upon the conservative assumptions adopted in the assessment), they would be at levels that have been assessed as not significant.</p> <p>An assessment of noise impacts is provided in ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1].</p>	N	Y	N
Concern regarding noise pollution and vibration from solar panels during operation	<p>Once operational the Scheme will include components that would generate varying levels of noise. These include the BESS, inverters, transformers and switchgear. The exact products that will ultimately be used in the Scheme have not been selected and a degree of flexibility has been planned for carrying out the assessment. In recognition of this, the assumptions that have been used in the assessment of operational phase noise are deliberately conservative and where necessary consider different design options and scenarios.</p> <p>The operational phase assessment has considered the effect of plant operation, vehicle movements and any vibration at the nearest noise sensitive receptors during daytime and nighttime periods. Whilst the assessment confirms that some residential properties would experience a degree of noise (based upon the conservative assumptions adopted in the assessment), they would be at levels that have been assessed as not significant.</p> <p>There is no vibration expected from this type of plant / equipment and the effect of the Scheme on vibration would not be significant.</p> <p>More information is covered in ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1].</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding noise impacts on nearby properties	ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Scheme. Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area. The assessment concludes that there would be no significant (in EIA terms) noise effects on any nearby residential properties.	N	Y	Y
Concern regarding noise associated with the construction phase / Concern regarding noise from construction on weekends or early morning and evening	<p>ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Scheme.</p> <p>Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area.</p> <p>An outline Construction Environmental Management Plan [EN010141/DR/7.3] has been developed as a requirement of the DCO application and outlines how construction activities will be managed throughout the construction process.</p> <p>The outline Construction Environmental Management Plan [EN010141/DR/7.3] sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance.</p> <p>This includes proposing that construction works will take place between 8am and 6pm, Monday to Friday, and between 8am and 1pm on Saturdays. The Applicant is not proposing any construction activity on Sundays or bank holidays.</p>	N	Y	Y
Socio-economic, recreation, and tourism				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
<p>Concern regarding impact of construction and operation on local businesses</p>	<p>ES Vol 1 Chapter 14: Socio Economics, Land and Tourism [EN010141/DR/6.1] considers the impact of the Scheme on the local businesses, in the context of the following matters:</p> <ul style="list-style-type: none"> • Employment generation (temporary and longer-term); • Impacts on tourism and the visitor economy; • PRoW insofar as diversions or stopping up would affect the visitor economy; • Changes of land use within the Site Boundary and any changes to accessibility and amenity for receptors beyond the Site Boundary; • Gross Value Added (GVA) and Fiscal Effects from business rates; and • Other local services, including residential properties, business premises, public health and education services, and community facilities. <p>It is anticipated that construction works, including works on the main site and the grid connection would take an estimated 30 months to complete and that the average number of workers on Site across the construction phase would be 496. The effect of the employment generation would be beneficial but temporary and not significant.</p> <p>The Applicant has prepared an outline Skills, Supply Chain and Employment Plan [EN010141/DR/7.11] which sets out that local businesses and supply chains will be utilised for the construction and operational phases of the Scheme as far as practicable.</p> <p>Analysis of available accommodation in has confirmed that there would be no adverse effect on the overall hotel, bed and breakfast, and inns accommodation sector arising from the Scheme, as set out in ES Vol 1 Chapter 14: Socio Economics, Land and Tourism [EN010141/DR/6.1].</p> <p>There are no residential properties, business premises, community facilities or planned development sites within the boundary of the Scheme which would need to be demolished, or which would be displaced by the Scheme. There is potential for noise, air quality, visual and traffic effects arising from construction of the Scheme to impact on the amenity of residents, businesses, and users of open spaces within 500m of the Site. The</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>effects of which are assessed in other chapters of the ES. However, based on the conclusions of those assessments, whilst there would be some adverse effects they would not be significant.</p> <p>It is estimated that 9 existing jobs in the agricultural sector would be lost as result of the Scheme. The Scheme itself will generate an estimated 20 full time equivalent employee roles over its 40-year lifespan. Although the overall balance of new jobs would have a beneficial impact, they would not be significant.</p>			
Concern regarding noise impacts on local businesses	<p>ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] considers the noise impacts and mitigation of the Scheme.</p> <p>The construction phase noise and vibration assessment has considered effects from plant noise, construction road traffic on the local road network, vibration from construction plant and heavy good vehicle movements, and noise / vibration associated with the construction of the grid connection. The assessment concludes that based upon the adoption of the proposed mitigation measures the effects of noise and vibration during the construction phase would be not significant.</p> <p>Once operational the Scheme will include components that would generate varying levels of noise. These include the BESS, inverters, transformers and switchgear. The exact products that will ultimately be used in the Scheme have not been selected and a degree of flexibility has been planned for carrying out the assessment.</p> <p>The operational phase assessment has considered the effect of plant operation, vehicle movements and any vibration at the nearest noise sensitive receptors during daytime and nighttime periods. Whilst the assessment confirms that some residential properties would experience a degree of noise (based upon the conservative assumptions adopted in the assessment), they would be at levels that have been assessed as not significant.</p>	N	Y	Y
Statement that the Scheme will diminish the aesthetic value of	An assessment of impacts and effects on local tourism are provided in ES Vol 1 Chapter 14: Socio Economics, Land and Tourism [EN010141/DR/6.1] which concludes that effects would be negligible and not significant in EIA terms.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
the surrounding area, impacting local tourism				
Statement that construction traffic may prevent people access historical sites for recreation and tourism	<p>As a result of the measures outlined above and in the application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the DCO application.</p> <p>The Scheme will not restrict access to any historical sites for recreation and tourism.</p>	N	Y	N
Suggestion to create an outdoor heritage museum with visitor centre facilities for the Roman Small Town to increase tourism and create additional jobs in the local area	<p>The Applicant is not including for an outdoor heritage museum with visitor centre facilities as part of the application.</p> <p>The Applicant has prepared an outline Heritage Enhancement Strategy [EN010141/DR/7.16] that sets out measures proposed to enhance an understanding of heritage across the Site. This includes providing a permissive path around the perimeter of the northern field of the Roman Small Town.</p> <p>The Applicant is committed to further investigation of the Roman Small Town scheduled monument post consent.</p>	N	Y	N
Concern regarding loss of employment / Statement that the Scheme will only offer jobs during the construction phase	<p>The Applicant has carefully considered the employment impacts of the Scheme through ES Vol 1 Chapter 14: Socio Economics, Land Use and Tourism [EN010141/DR/6.1]. This estimates that the site area supports nine existing jobs that would be lost as a result of the Scheme. However, it is expected that there would be 20 gross direct full time employee equivalent roles during the operational phase, creating a net gain.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Health and wellbeing				
Statement that the Scheme will impact quality of life in the area	An assessment of human health impacts has been provided within ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] which concludes that whilst there would inevitably be adverse impacts as a result of the Scheme, these effects would not be significant (in EIA terms) or unacceptable.	N	Y	Y
Concern regarding health risks associated with living near solar panels	<p>There is no evidence to suggest that the operation of solar farms presents health risks to nearby communities. Solar photovoltaic (PV) technology has been deployed globally for several decades and is recognised as a safe and reliable means of generating renewable electricity.</p> <p>Solar panels are inert, do not emit harmful substances during operation, and are designed and certified to international safety standards. The panels generate electricity as direct current (DC) which is then converted to alternating current (AC) for export to the grid. This process does not produce harmful emissions, pollutants, or radiation.</p> <p>In addition, the Scheme will be designed and operated in accordance with all relevant UK health, safety, and environmental regulations. On this basis, the Scheme is not expected to give rise to any adverse health effects for local residents.</p>	N	Y	Y
Concern regarding health risks associated with living near BESS	<p>BESS installations are designed, manufactured, and operated in compliance with UK and international safety standards. They are widely deployed across the UK electricity network and internationally, with no evidence to indicate that their presence gives rise to adverse health effects for nearby communities.</p> <p>The BESS will be housed within purpose-designed enclosures, incorporating fire safety, ventilation, and thermal management systems in line with industry best practice and regulatory requirements. The Applicant has prepared an outline Battery Safety Management Plan [EN010141/DR/7.10].</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding electromagnetic fields (EMF) and radiation from solar panels	The Scheme would result in no significant effects on people or other receptors as a result of electromagnetic fields, as set out in Section 16.5 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] .	N	Y	N
Statement that no consideration has been given to the mental health impacts of the Scheme / General concern regarding mental health impacts during construction and operation	<p>Consideration has been given to potential amenity effects during both construction and operation, including noise, traffic, dust, and visual impacts, all of which could influence wellbeing (as set out in ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]). Mitigation measures are secured through the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5]. Such measures are designed to minimise disruption and ensure that effects on local communities are appropriately controlled.</p> <p>It is recognised that engagement and clear communication can also help reduce anxiety and uncertainty. The Applicant has therefore committed to ongoing community liaison throughout the lifecycle of the Scheme, including the establishment of a community liaison group, provision of timely information on construction activities, and opportunities for involvement in environmental enhancement measures.</p>	N	Y	Y
Cumulative impacts				
General concern regarding the cumulative impact	The cumulative impacts of the Scheme alongside other proposed developments in close proximity to the site have been fully assessed across all technical disciplines in ES Vol 1 Chapter 17: Cumulative and In Combination Effects [EN010141/DR/6.1] . The additional developments assessed have been agreed with the relevant authorities to ensure that the correct developments have been identified. The assessment concludes that there would be no significant cumulative residual effects beyond the effects of the Scheme in isolation.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding the cumulative impact with already approved or existing solar projects in the area	The cumulative impacts of the Scheme alongside other proposed developments in close proximity to the site have been fully assessed across all technical disciplines in ES Vol 1 Chapter 17: Cumulative and In Combination Effects [EN010141/DR/6.1] . The additional developments assessed have been agreed with the relevant authorities to ensure that the correct developments have been identified. The assessment concludes that there would be no significant cumulative residual effects beyond the effects of the Scheme in isolation.	N	Y	N
Opposition to the number of projects in one area / Statement that the area has already played its role in net zero and should not have to host any further development	<p>The Applicant recognises that there are existing and planned solar developments in this area, however there is a need to continue to develop solar projects in order to meet government targets, including that of decarbonising the electricity transmission system and tripling the amount of solar produced in the UK by 2030.</p> <p>The proposed location of East Park Energy has also been influenced by the Applicant's agreement with National Grid to connect into the electricity transmission network at Eaton Socon substation, as the substation has significant capacity to connect new project.</p> <p>A statement of need for the Scheme is provided in Section 2 of the Planning Statement [EN010141/DR/5.3].</p>	N	Y	N
Alternative solutions and location				
Suggestion that the Scheme should be located on brownfield sites / Suggestion to use already industrialised sites in the area	In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land. However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own. This is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] .	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Suggestion that the Scheme should be located on rooftops / Suggestion to make use of existing structures for locating the Scheme	Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.	N	Y	Y
Statement that alternative energy generations, such as Nuclear Small Modular Reactors and wind turbines, are preferable or more efficient	<p>The Applicant acknowledges the range of views on energy technologies.</p> <p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets.</p> <p>Solar power is a clean source of electricity, meaning that no carbon emissions are created when energy is generated in this way. Some of the other benefits associated with solar include:</p> <ul style="list-style-type: none"> • Solar power is cheaper to produce than fossil fuel sources of electricity ; • Solar and battery storage support the UK's energy security by providing more homegrown power; and • Solar is generally quicker to build than other sources of renewable or low carbon power. <p>The Planning Statement [EN010141/DR/5.3], which has been submitted as part of the application, sets out the need for the Scheme at Section 2, and how it is in accordance with national and local planning policy.</p>	N	Y	N
Suggestion of alternative areas within the immediate vicinity of the Site that solar development	The Applicant's approach to land identification is set out in ES Vol 2 Appendix 3-2 Land Identification Report [EN010141/DR/6.2] . This Report sets out the land offered by landowners for potential use as part of the Scheme. Given that this land totalled almost	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
could be located on, including at Crown Farm, between Middle Lodge and Manor Farm, north of Site B, and south of Sites B and C	double that theoretically required for the Scheme, it also sets out the criteria the Applicant used to select which land parcels to take forward as part of the Scheme.			
Suggestion that panels should be located closer to Eaton Socon and St Neots, or at alternative locations along the A421 or A1	<p>The Applicant's approach to Site identification is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]. This report sets out the four stages that informed the Applicant's approach to site identification:</p> <ul style="list-style-type: none"> • Stage 1: Identification of the Area of Search; • Stage 2: Review of Brownfield and Previously Developed Land • Stage 3: The Exclusion of Land Covered by Planning, Environmental and Other Spatial Constraints; and • Stage 4: Factors influencing site selection. <p>The initial Area of Search included all land within 15km of the proposed connection point at Eaton Socon substation. Three Search Zones were subsequently identified:</p> <ul style="list-style-type: none"> • Zone A: Located either side of the A14 at the northernmost extent of the original Area of Search, to the north of Grafham Water; • Zone B: Located across then north-west of the original Area of Search, to the south-west of Grafham Water; and • Zone C: Located to the east of the A1 between St Neots, Sandy and Potton in the south of the original Area of Search. <p>ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] concludes that, whilst there were no Search Zones that were not constrained in some way, that Zone B should be taken forward. This was due to Zone B being found as 'likely to have the most straightforward grid connection, which should in turn avoid and reduce environmental</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>impacts, affect less landowners, and ensure that the Scheme remains commercially viable.'</p> <p>The Applicant's approach to land identification is then set out in ES Vol 2 Appendix 3-2 Land Identification Report [EN010141/DR/6.2]. This Report sets out the land offered by landowners for potential use as part of the Scheme. Given that this land totalled almost double that theoretically required for the Scheme, it also sets out the criteria the Applicant used to select which land parcels to take forward as part of the Scheme.</p>			
General opposition to location of Scheme	<p>The Applicant acknowledges the range of views expressed in response to the statutory consultation. The UK needs to take urgent action to respond to climate change and other factors, such as instability in global energy markets. The UK has a legally binding commitment to reduce carbon emissions to net zero (meaning that it will remove as much carbon from the atmosphere as we produce) by 2050, whilst Cambridgeshire County, Bedford Borough and Huntingdonshire District Councils all have their own net zero targets.</p> <p>As a country, the UK has already made a huge amount of progress towards meeting these targets. Government data shows that greenhouse gas emissions in the UK have fallen by 50% since 1990, but there's a lot more still to do. Fossil fuels are still responsible for more than one quarter of the UK's total electricity supply, whilst demand for electricity is forecast to roughly double between now and 2050. Renewable sources of energy, such as solar power, will be crucial to helping replace fossil fuel energy sources and to meeting future increases in energy demand.</p> <p>The approach to siting the Scheme is set out in ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1] and the Design Approach Document [EN010141/DR/5.6].</p>	N	Y	Y
Scepticism regarding justification of chosen location / Statement that justification of location is not sufficient given	<p>When developing the proposals, the Applicant sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile' where possible. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the agreed connection point at</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
the land is high quality agricultural land	<p>Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the proposals do still involve building solar infrastructure on some high-quality farmland.</p> <p>The Applicant has an agreement with National Grid to connect into the electricity network at Eaton Socon substation, as the substation has the capacity to connect a new project to it. Some parts of the network elsewhere in England are more constrained, and National Grid has an ongoing programme of planned upgrades to the network to help accommodate new energy connections.</p> <p>Based on the connection agreement, the Applicant began the site selection process by establishing a 15km search area for suitable land around Eaton Socon substation. When assessing the suitability of land, the Applicant reviewed it against known planning and environmental constraints, in accordance with the guidance on 'factors influencing site selection' that forms part of the Government's national policy statements. This work identified a search zone to the north west of Eaton Socon substation that was considered the most suitable location for a development of this nature.</p> <p>Following this, the Applicant approached landowners within the search zone to gauge their interest in being part of the project. The Applicant reviewed the offers received to establish any constraints and refined the amount of land proposed to form part of the project.</p> <p>The Planning Statement [EN010141/DR/5.3], which has been submitted as part of the DCO Application, sets out the need for the Scheme, and how it is in accordance with national and local planning policy.</p> <p>ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] provides more information on the agricultural land survey.</p>			
Statement that parts of the Scheme are based on north facing slopes instead of south	The gradients proposed for solar development across the Scheme are suitable for development without shading impacts, and the Scheme remains an efficient use of land.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
facing, reducing the efficiency of the Scheme				
Needs case				
Statement that solar energy is inefficient	Solar energy is an important component of the Government's plans for Clean Power 2030, as set out in the statement of need at Section 2 of the Planning Statement [EN010141/DR/5.3] .	N	Y	Y
General support for renewable energy / Statement recognising need to reach net zero / Statement that climate change is a threat	<p>The Applicant notes these comments.</p> <p>The UK needs to take urgent action to respond to climate change and other factors, such as instability in global energy markets. The UK has a legally binding commitment to reduce carbon emissions to net zero (meaning that it will remove as much carbon from the atmosphere as we produce) by 2050, whilst Cambridgeshire County, Bedford Borough and Huntingdonshire District Councils all have their own net zero targets.</p> <p>As a country, the UK has already made a huge amount of progress towards meeting these targets. Government data shows that greenhouse gas emissions in the UK have fallen by 50% since 1990, but there's a lot more still to do. Fossil fuels are still responsible for more than one quarter of the UK's total electricity supply, whilst demand for electricity is forecast to roughly double between now and 2050. Renewable sources of energy, such as solar power, will be crucial to helping replace fossil fuel energy sources and to meeting future increases in energy demand.</p>	N	Y	Y
Statement that the local plan for development should take priority / Statement that the Scheme does not meet the requirements of the local plan	The Scheme is a Nationally Significant Infrastructure Project (NSIP) and as such is determined in accordance with the National Policy Statements for Energy as part of the Planning Act 2008 regime. The local development plans for the area are an important and relevant consideration for the Secretary of State in determining the application.	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>The Planning Statement [EN010141/DR/5.3], which has been submitted as part of the DCO Application, sets out the need for the Scheme, and how it is in accordance with national and local planning policy.</p> <p>Local plan policies are specifically considered in the Policy Compliance Document [EN010141/DR/5.4].</p>			
Recognition of the need for energy security	<p>Although energy prices have fallen from their peak in 2022, they remain more than 25% higher than before the rapid price increases started in 2021, and it is forecast that costs will increase again this year. One of the ways the UK can avoid sudden future rises in the cost of electricity is by producing more homegrown power, thus reducing the reliance on importing oil and gas from overseas. The Scheme will directly support this.</p> <p>More information on the need for the Scheme is included in the Planning Statement [EN010141/DR/5.3].</p>	N	Y	Y
Statement that energy security should not be a priority	<p>One of the ways the UK can avoid sudden future rises in the cost of electricity is by producing more homegrown power, thus reducing the reliance on importing oil and gas from overseas. The Scheme will directly support this.</p> <p>More information on the need for the Scheme is included in the Planning Statement [EN010141/DR/5.3].</p>	N	Y	N
Scepticism around climate change / General opposition to net zero	<p>It is a generally agreed amongst the scientific community that climate change is occurring, largely due to rising levels of carbon dioxide and other greenhouses gases. The Intergovernmental Panel on Climate Change provides policy makers with regular scientific assessments on climate change, its implications, and potential future risks. More information on climate change can be found on GOV.UK.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Statement that the Scheme contradicts with current Government guidelines or policy	The Planning Statement [EN010141/DR/5.3] , which has been submitted as part of the DCO Application, sets out the need for the Scheme, and how it is in accordance with national and local planning policy.			
Statement that the Scheme is not in the national interest	<p>The UK has a legally binding commitment to reduce carbon emissions to net zero by 2050, whilst Cambridgeshire County, Bedford Borough and Huntingdonshire District Councils all have their own net zero targets.</p> <p>The UK has made significant progress towards meeting these targets. Government data shows that greenhouse gas emissions in the UK have fallen by 50% since 1990, however fossil fuels are still responsible for more than one quarter of the UK's total electricity supply, whilst demand for electricity is forecast to roughly double between now and 2050. Renewable sources of energy, such as solar power, will be crucial to helping replace fossil fuel energy sources and to meeting future increases in energy demand.</p> <p>The Scheme will directly support the move towards net zero.</p> <p>More information on the need for the Scheme is included in the Planning Statement [EN010141/DR/5.3].</p>	N	Y	N
Community benefits/enhancements				
General support for the East Park Legacy Fund proposal	At statutory consultation, the Applicant sought views on three models for delivery a Legacy Fund that would provide financial contributions to local projects and initiatives. These options included suggested financial funding of £2 million (Option A – lump sum), £4 million (Option B – lump sum and annual fund) and £6 million (Option C – annual fund). Whilst the Applicant has not confirmed which distribution model the Legacy Fund will use, it is confirming its intention to increase the amount of funding to £400 per megawatt of installed solar capacity per year. Across the lifetime of the project, this would give the Legacy Fund a total value of £6.4 million.	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
General opposition to the East Park Legacy Fund proposal	The Applicant wants to ensure that those living in the area around our proposals for East Park Energy benefit from the construction and operation of the project. We are proposing to do this through the creation of the East Park Legacy Fund, which could provide funding to local projects. This is set out in the Planning Statement [EN010141/DR/5.3] .	N	Y	Y
Statement that the proposed Legacy Fund is insufficient / Statement that the proposed funding is too small compared to the scale and impacts of the Scheme	At statutory consultation, the Applicant sought views on three models for delivery a Legacy Fund that would provide financial contributions to local projects and initiatives. These options included suggested financial funding of £2 million (Option A – lump sum), £4 million (Option B – lump sum and annual fund) and £6 million (Option C – annual fund). Whilst the Applicant has not confirmed which distribution model the Legacy Fund will use, it is confirming its intention to increase the amount of funding to £400 per megawatt of installed solar capacity per year. Across the lifetime of the project, this would give the Legacy Fund a total value of £6.4 million.	N	Y	Y
Suggestion that the management of the Legacy Fund should be legally separate from the developer / Suggestion that local parishes and interest groups should have full control of funds and allocation	The details of the Community Benefit Fund are set out in the Planning Statement [EN010141/DR/5.3] . The Applicant will work with local community representatives to understand how this fund can be best used to meet the area's needs and aspirations and to design a suitable delivery model. It is likely that groups and individuals will be able to apply to the Community Benefit Fund for a wide range of initiatives and that the local community will have a key role in the allocation of funds.	N	Y	Y
Suggestion that a proportion of the Legacy Fund should be ringfenced for Little Staughton	Outline details of the Community Benefit Fund are set out in the Planning Statement [EN010141/DR/5.3] . The Applicant will work with local community representatives to understand how this fund can be best used to meet the area's needs and aspirations and to design a suitable delivery model. The Applicant is not proposing to ringfence or allocate any of the funding to specific areas at this time.	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Suggestion that local residents impacted by the Scheme should benefit in the form of reduced energy bills	As the Scheme will connect directly into the electricity transmission network, it is not possible for local residents to benefit directly from the power generated by it. This is because the power will be moved around the network to suit demand. However, residents will benefit from the long-term benefits that will arise as part of the Scheme, including increased energy security as a result of reduced reliance on imported oil and gas from overseas.	N	Y	Y
Statement that the developer should compensate for any reduction in property values as a result of the Scheme / Statement that the Scheme will negatively impact house prices in the local area	The Applicant acknowledges the concerns raised in relation to changes in property values as a result of the Scheme.	N	Y	Y
Suggestion that residents next to the Scheme should be compensated for any visual impacts	The Applicant has prepared ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2] which sets out there are no properties where the residential visual amenity threshold would be exceeded. The Applicant is not intending to provide direct compensation to local residents.	N	Y	Y
Suggestion that a profit sharing Scheme would be preferable	The Applicant has incorporated the Community Benefit Fund as a core feature of the Scheme to ensure that it results in tangible financial benefit for the local community.	N	Y	N
Scepticism in the community funding process / Statement that the Legacy Fund will not be delivered / Suggestion that the Legacy Fund should be secured through a DCO condition	The Legacy Fund (Community Benefit Fund) is a part of the Scheme that would be delivered alongside other components.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Construction				
Concern regarding disruption associated with the construction of the cable route	The grid connection between Site D and the Eaton Socon Substation will inevitably result in some disruption to landowners whilst the trench and cabling is being laid. Access for construction of the grid connection will be taken from Site D towards the Eaton Socon Substation, including crossings of Bushmead Road and Duloe Lane. There will be very limited traffic movements across Bushmead Road or Duloe Lane. The Applicant has prepared an outline Construction Traffic Management Plan [EN010141/DR/7.4] .	N	Y	Y
Temporary access points used for laying cables during construction leading to large vehicles using unsuitable and narrow roads	Access for construction of the grid connection will be taken from Site D towards the Eaton Socon Substation, including crossings of Bushmead Road and Duloe Lane. There will be very limited traffic movements across Bushmead Road or Duloe Lane. The Applicant has prepared an outline Construction Traffic Management Plan [EN010141/DR/7.4] .	N	Y	Y
Concern regarding the impact of site access points on pedestrians and cyclists using roads without pavements	ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. The Applicant has prepared both an outline Construction Traffic Management Plan [EN010141/DR/7.4] and an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out how the public will be kept safe during construction.	N	Y	N
Impact of proposed construction access points on existing Public Rights of Way / Statement that footpath closures will be	The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme. It details that the diversions and safety measures	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
inevitable during construction or operation	<p>will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction.</p> <p>The Applicant is not proposing to permanently close any PRow as part of the proposals.</p> <p>Some temporary diversions of PRow may be required during the construction phase. Management of PRow is likely to include the use of fencing to separate PRow and construction traffic and activities. At some locations, banksmen would be utilised when construction traffic is required to cross a PRow.</p> <p>During the operational phase it is expected that all PRow would be maintained on their existing alignment and that no diversions or closures would be required.</p>			
Suggestion that noticeboards setting out the PRow's and permissive paths within the Scheme area should be erected	<p>The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which sets out how public rights of way will be managed during the construction phase.</p> <p>As set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7], the Applicant is proposing to include wayfinding, signage and interpretative panels across the Site during the operational phase of the Scheme to enhance and encourage use of the public rights of way.</p> <p>The Applicant has committed to establishing a Community Liaison Group at the construction phase and throughout the operational phase of the Scheme to keep local residents updated, and to receive feedback (e.g. in relation to public rights of way).</p>	Y	N	N
Request for a commitment from the developer that hedgerows removed for construction access will be reinstated once construction is complete	<p>Table 2-34 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] sets out the anticipated hedgerow removal and reinstatement timeframes as part of the Scheme. This corresponds to ES Vol 3 Figure 2-6 Indicative Vegetation Clearance [EN010141/DR/6.3].</p> <p>Hedgerows would be replanted in accordance with the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Request for a commitment from the developer that construction access tracks will be removed once construction of the Scheme is complete	The Applicant is proposing to create both temporary and permanent access tracks during the construction phase. The indicative location of temporary access tracks are shown on ES Vol 3 Figure 2-5: Indicative Construction Access and Compounds [EN010141/DR/6.3] – these access tracks would be constructed of heavy duty mapping that would be removed by the end of the construction phase.	N	Y	N
Suggestion to remove a construction access at Sharps Barn from the Scheme	Whilst there is access to an existing solar development near Sharps Barn off the B645, this does not form part of the Applicant's proposals for the Scheme.	N	Y	N
Statement that underground cabling will impact soil quality, released embedded carbon within the soil, and damage the land	An outline Soil Management Plan [EN010141/DR/7.9] has been prepared which sets out how soils will be sensitively managed across the lifetime of the Scheme.	N	Y	Y
Concern regarding noise, dust and vibrations as a result of construction	<p>ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Scheme.</p> <p>Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area.</p> <p>An outline Construction Environmental Management Plan [EN010141/DR/7.3] has been developed as a requirement of the DCO application and outlines how construction activities will be managed throughout the construction process. It sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Statement that the local area cannot support a workforce of 850 people	<p>It is anticipated that construction works, including works on the main site and the grid connection would take estimated 30 months to complete and that the average number of workers on Site across the Construction Phase would be 496, with a peak workforce of 854 in Month 12 and a low of 30 in Month 1. 47.7% of construction workers are likely to reside within the Study Area (as defined by the 90-minute travel to work area) and will represent local employment. The effect of the employment generation would be beneficial but temporary and not significant.</p> <p>More information is included in ES Vol 1 Chapter 14: Socio Economics, Land Use and Tourism [EN010141/DR/6.1].</p>	N	Y	Y
Concerns regarding accommodation for workforce during 3 year construction period	<p>Consideration has been given to the availability of local accommodation within ES Vol 1 Chapter 14: Socio Economics, Land and Tourism [EN010141/DR/6.1].</p> <p>Using data obtained from CoStar (2025), the number of inventory rooms within a 30-minute drive time radius from the site is 9,094 and there are currently between 1,836 and 3,282 surplus rooms available, depending on the time of year.</p> <p>There would be no anticipated adverse effect on availability within the overall hotel, bed and breakfast, and inn accommodation sector arising from the Scheme, and it is anticipated that accommodation providers would be able to accommodate employees working at the Scheme without any adverse effects on the sector.</p>	N	Y	Y
Query regarding whether workforce will be employed from the local area	<p>The Applicant has prepared an outline Skills, Supply Chain and Employment Plan [EN010141/DR/7.17] which sets out a strategy for promoting the take up of jobs by local people where possible with the objective of maximising local employment and enhancing workforce diversity at each stage of the Scheme.</p>	N	Y	N
Operation				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding disruption associated with maintenance of the Scheme	<p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>	N	Y	Y
Concern regarding durability of solar panels / Concern regarding damage to solar panels	<p>Solar photovoltaic panels are designed to be robust and long-lasting, typically with an operational lifespan of 30–40 years. Panels procured for the Scheme will be certified to relevant international standards, which require testing for resistance to wind, hail, snow, temperature fluctuations, and other environmental stresses.</p> <p>In the unlikely event of panel damage during operation (for example, from extreme weather or accidental impact), the design of the panels ensures that any such damage remains contained within the module.</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>	N	Y	Y
Concern regarding the longevity of the Scheme / Statement that solar panels will need to be replaced during the lifetime of the Scheme	<p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Statement that security cameras will be an invasion of residents' privacy	Both the construction sites and operation site will include CCTV. All CCTV cameras will be inward facing to monitor the security of the solar infrastructure. They will not be focused on residential properties.	N	Y	N
Statement that the Scheme will be inefficient / Statement that the Scheme will only operate during the day	Solar photovoltaic technology is a proven and reliable form of renewable energy generation. In addition, the co-located BESS will enable electricity to be stored on site and exported to the grid when demand is highest, including outside daylight hours. This enhances the overall efficiency and contribution of the Scheme to the UK's secure, low-carbon energy supply.	N	Y	Y
Statement that the energy will be wasted in the summer / Statement that overcast skies and winter conditions will restrict energy generation / Concerns regarding seasonal variation of energy generation	Solar photovoltaic technology is a proven and reliable form of renewable energy generation. In addition, the co-located BESS will enable electricity to be stored on site and exported to the grid when demand is highest, including outside daylight hours. This enhances the overall efficiency and contribution of the Scheme to the UK's secure, low-carbon energy supply.	N	Y	N
Concern that landscaping and screening will not be maintained, leading to ineffective screening of the Scheme	<p>The landscape mitigation is secured by the illustrative landscape proposals at Appendix A of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the oLEMP [EN010141/DR/7.7]. This ensures the proposed landscaping is successful in establishing and can be relied on as embedded mitigation for the Landscape and Visual impact Assessment.</p> <p>Whilst the proposed mitigation would be successful in screening the Scheme in the majority of views, there would still be views where the Scheme would remain visible in the long-term. These are identified as part of the assessment of effects undertaken in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Decommissioning				
Query regarding the financial arrangements for decommissioning / Suggestion that an escrow fund should be set up for decommissioning	The Applicant's approach to decommissioning includes returning the land that forms the Scheme to a condition suitable for return to its original use after decommissioning, with the exception of areas of planting (woodland and hedgerows) that would be retained post-decommissioning. The requirement of a decommissioning bond or some other assurance may arise during the planning process, although at this time the Applicant considers the legal requirements within the draft DCO [EN010141/DR/3.1] to be sufficient.	N	Y	Y
Concern regarding waste or infrastructure left on site after decommissioning	<p>The Applicant has provided an updated assessment of potential waste impacts in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>Waste will be managed in accordance with the outline Waste Management Plan [EN010141/DR/7.12], as well as the outline Construction Environmental Management Plan [EN010141/DR/7.3], outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p> <p>The Applicant notes the decision by the Secretary of State in determining the East Yorkshire Solar Farm DCO (ExA report ref 3.13.50 and 3.13.51) that although the capacity of facilities to handle decommissioned solar PV panels is still developing, the recycling industry is likely to respond to demand over time.</p>	N	Y	N
Consultation				
Scepticism in the consultation process / Statement that the outcome has already been	The Applicant disagrees with the characterisation of its statutory consultation, through which it sought to meaningfully engage with communities regarding plans for the Scheme in line with the requirements of the Planning Act 2008.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
decided and public views won't be taken into consideration	<p>When carrying out the statutory consultation, the Applicant sought to positively respond to comments about how it undertook the non-statutory consultation where possible. For example, it held two additional consultation events, including a full public consultation event in Great Staughton and a series of 1:1 bookable meetings in Pertenhall. The Applicant also rebuilt the project website to improve accessibility to the detailed information provided as part of the statutory consultation.</p> <p>The purpose of the in-person consultation events was to provide an opportunity for those interested to learn more about the proposals and speak to members of the project team. Many such conversations were had, with more than 300 people attending these events in total. However, the Applicant made clear during the consultation that respondents should submit formal feedback via the feedback channels identified in the consultation material to avoid comments being paraphrased or misinterpreted.</p> <p>The Consultation Report [EN010141/DR/5.1] outlines how the consultation and engagement has been delivered inline with the requirement so the Planning Act 2008.</p>			
Statement that the consultation materials were misleading or biased	The Applicant has a responsibility to fairly present the Scheme through the consultation materials. The Applicant created a suite of materials of varying complexity to meet the needs of a range of stakeholders. This included the consultation brochure, non-technical summary of the Preliminary Environmental Information Report (PEIR) and PEIR. In these documents the Applicant explained the project need and benefits, alongside details of the potential impacts and mitigations which may be considered.	N	Y	Y
Statement that maps were not detailed enough / Statement that maps contained errors	<p>In addition to the plans included in the Consultation Brochure, Newsletter and Feedback, as part of the 2024 statutory consultation the Applicant also published a series of detailed plans in Figures 2.1 to 2.7 of the PEIR. All information was uploaded to the project website.</p> <p>During the 2024 statutory consultation, a small number of comments were received about how the boundary of Site B was represented in the newsletter and Consultation brochure. As a result of this, the Applicant made the decision to update the digital versions of both documents, along with the 'Our proposals' page of the project website, to more clearly</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	shown this boundary. The rest of the plans published at the consultation were considered to clearly show the boundary, and so were not changed.			
Concern regarding documents not being accessible or easy to understand / Statement that documents were made intentionally difficult to understand or access	<p>The Applicant has a responsibility to fairly present the Scheme through the consultation materials. The Applicant created a suite of materials of varying complexity to meet the needs of a range of stakeholders. This included the consultation brochure, non-technical summary of the Preliminary Environmental Information Report (PEIR) and PEIR. In these documents the Applicant explained the project need and benefits, alongside details of the potential impacts and mitigations which may be considered.</p> <p>All consultation material was made available on the project website and was clearly signposted from the homepage. Paper copies of materials, including the feedback form and consultation document, were available at consultation events and available upon request through contact channels.</p>	N	Y	Y
Query regarding why Pertenhall did not have a public consultation event / Concern that residents were unable to get an appointment to meet with the team in Pertenhall / Statement that appointments were fully booked early on in the consultation period	<p>Whilst the Applicant did not consider Pertenhall Village Hall a suitable location for a full public exhibition due to its size, the Applicant held a day of one-to-one meetings for anyone with more detailed questions about the Scheme.</p> <p>Members of the public had the opportunity to request a one-to-one appointment on the project website, or by speaking to a member of the project team. By having one-to-one bookable appointments, the Applicant could regulate the number of people at the venue at any one time, meaning that they were able to still hold a consultation event in this area. Whilst it was advertised in the consultation materials that the appointments were available on a first come, first served basis and that people should book an appointment before attending, the team did endeavour to still speak to those who attended without an appointment.</p> <p>The Applicant did not publish any statements suggesting that the one-to-one appointments were fully booked prior to the event, and the final appointment slot was booked on the morning of the one-to-one appointments. Where people got in touch to ask</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	whether appointments were still available during the consultation period, we confirmed which slots were still available.			
Suggestion that the Applicant consults with the Ramblers Association, Bedfordshire Wildlife Trust and Campaign to Protect Rural England	The Applicant can confirm that it consulted all of the bodies listed as part of the statutory consultation as non-prescribed consultees, with the Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust and Campaign to Protect Rural England both submitting responses to the consultation. Detail of the responses from these bodies, along with how the Applicant has had regard to it, can be found in Consultation Report Appendix 5-4: Regard had to non-prescribed consultee responses [EN010141/DR/5.2] .	N	Y	N
Suggestion that wildlife areas created as part of the Scheme should be offered to the Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out that three FTE roles will be created to manage the landscape proposals as part of the Scheme.	N	Y	N
Suggestion that financial contributions should be made to the Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust as part of the Scheme	At the 2024 statutory consultation, the Applicant set out three potential models for how community benefit could be delivered as part of the Scheme, including options which provided lump-sum funding at the start of the operational phase. Following the consultation, the Applicant subsequently announced its intention to deliver community benefit funding in excess of any of the options consulted on previously. The Applicant proposes community benefit funding at a rate of £400 per year per megawatt and will work with relevant stakeholders to determine a suitable delivery prior to operation. This could include grant funding to the Wildlife Trust, but is not committed at this time.	N	Y	N
Walking, cycling and horse-riders				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Suggestion to upgrade PRow to public bridleways	The Scheme has been designed to maintain all existing PRow and, where necessary, provide appropriate diversions during construction to ensure continued connectivity for users. However, the Scheme does not include permanent upgrades of PRow to bridleways. The Applicant is nevertheless committed to ensuring that existing PRow remain safe, accessible, and appropriately managed during both construction and operation.	N	Y	N
Concern regarding maintenance and enhancement of PRow	<p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme. It details that the diversions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction.</p> <p>The proposed maintenance and enhancement of public rights of way is set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>	N	Y	N
Statement that rural PRow will become fence lined, industrial pathways if hedgerows are lost or not maintained	<p>The Applicant is proposing to set back fence lines from field boundaries and public rights of way in areas of high ground, such as west of Little Staughton and at the southern end of Site C, to avoid the solar array breaking skylines, and to allow views out looking 'over' the solar arrays to retain panoramic vistas where possible.</p> <p>The Applicant is also proposing to retain all existing woodland, hedgerows, individual trees, ditches and watercourses as far as practicable.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>The landscape mitigation is secured by the illustrative landscape proposals at Appendix A of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the oLEMP [EN010141/DR/7.7]. This ensures the proposed landscaping is successful in establishing and can be relied on as embedded mitigation for the Landscape and Visual impact Assessment.</p>			
Suggestion that further enhancements to PRow are required as part of the Scheme	<p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; 	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<ul style="list-style-type: none"> Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features. 			
Concern regarding the loss of PRow	<p>The Applicant is not proposing to permanently close any PRow as part of the proposals, and will look to retain all existing public rights of way along their current alignment.</p> <p>As part of our mitigation measures, the Applicant is also proposing the provision of permissive footpaths west of Little Staughton to increase access to the local public rights of way network and create the opportunity for new circular routes.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p>	N	Y	Y
Support for creation of permissive paths	The Applicant notes these comments. ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation, including the location of proposed permissive paths.	N	Y	N
Suggestion to include permissive footpaths between areas of planting/habitat creation	ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed permissive footpaths across the Scheme area, including between area proposed to be planting with species-diverse grassland in Site B.	N	Y	N
Suggestion for permissive footpaths to be formally adopted in the future	At this stage, the permissive footpaths would be removed at the end of the decommissioning phase of the Scheme, once the Applicant's leases or rights over the land expire. The Applicant will continue to engage with landowners who may continue to	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	provide permissive access along these routes once the Scheme is decommissioned, but the Applicant can make no commitment in this regard.			
Project finance/cost of Scheme				
Statement that the developer is prioritising profits over impact on the local area	<p>Whilst the Applicant is a commercial entity, the Scheme has a range of benefits to the community and the UK as a whole.</p> <p>The Scheme would boost the UK's energy security by connecting up-to 500 megawatts of power to the electricity transmission network. Up-to 400 megawatts of this total – enough energy to power 108,000 homes - would be from new, clean solar generation capacity, whilst the battery storage facility would have a capacity of an additional 100 megawatts.</p> <p>The Applicant will also create a Legacy Fund a total value of £6.4 million across the lifetime of the project for the local community.</p>	N	Y	Y
Query regarding a decommissioning fund / Statement that a fund should be established prior to construction for the decommissioning and reinstatement of the land	The Applicant's approach to decommissioning includes returning the land that forms the Scheme to a condition suitable for return to its original use after decommissioning, with the exception of areas of planting (woodland and hedgerows) that would be retained post-decommissioning. The financing drawdown will include a decommissioning bond package, to ensure that the Scheme can be removed at the end of the operational phase.	Y	Y	Y
Assumption that the funding for the Scheme will come from overseas	The Scheme would be delivered via a combination of debt and equity, with the majority being provided by debt via project financing. The debt financing would be arranged and underwritten by major banks and financial institutions who are operating licenced lending in the UK. The equity financing would come from Brockwell's shareholders, who are established infrastructure investors with significant UK presence. Their funding would come through UK-registered entities. The same entities would be financing development of the scheme prior to Final Investment Decision and construction.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Request for further details on the financing of the Scheme	<p>As above, the Scheme will be financed through a combination of debt and equity. A key consideration will be the securing of contracted revenue streams to maximise debt capacity. The Scheme will evaluate both Corporate Power Purchase Agreements and possible application to participate into the relevant CfD auction as key enablers for this strategy. Furthermore, the Applicant will consider the feasibility of green financing/bonds which represents an additional source of blue-chip financing available to projects of this size.</p> <p>The senior debt financing be structured project finance which will be appropriately sized to take into account potential variability of cash flows over the life of the asset. It will utilise market-standard sizing ratios agreed by major UK lenders to ensure that the project will be able to comfortably pay back the debt investors over the life of the loan.</p> <p>The financing drawdown will include a decommissioning bond package, to ensure that the Scheme can be removed at the end of the operational phase.</p>	N	Y	Y
Statement that the Scheme is likely to be sold to another company prior to construction	<p>The Applicant intends to own and operate the Scheme through the construction, operation and decommissioning phases. Brockwell Energy's long-term ambition is to become an Independent Power Producer (IPP), and the East Park Energy scheme represents a key opportunity to add scale to Brockwell's growing portfolio.</p> <p>Brockwell has significant experience in delivering complicated infrastructure projects involving multiple key stakeholders, and as such does not foresee the construction of the Scheme as an obligation which is to be avoided. In the last 7 years Brockwell has developed, financed and constructed projects totalling approximately £1 billion</p>	N	Y	N
Impact on local area and communities				
Suggestion that the developer should purchase impacted properties at pre-development	The Planning Act 2008 provides a clear framework for the assessment of nationally significant infrastructure projects, including established provisions for compensation	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
market value to compensate residents	<p>where land or property interests are directly acquired or where statutory blight or injurious affection can be demonstrated.</p> <p>In this case, the Scheme does not require the compulsory purchase of residential properties, and compensation is therefore not applicable in the manner suggested. The Applicant is committed to minimising potential effects on neighbouring residents through the design of the Scheme and through the implementation of mitigation measures secured by the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5].</p>			
Statement that the Scheme is being forced upon local communities	<p>The Planning Act 2008 process allows for pre-application engagement to help ensure the local community can feed into the developing design of the Scheme.</p> <p>The Applicant has undertaken a two stages of consultation, alongside engagement with prescribed parties and those with an interest in land impacted by the Scheme.</p> <p>As a nationally significant infrastructure project, the final decision on whether the project is consented will be made by the Secretary of State for Energy Security and Net Zero.</p>	N	Y	Y
Concern regarding the impact on farming	<p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK's food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK's food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government's Food Security Report 2021, which stated that climate change and other environmental pressures like soil degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's domestic food production. This report also found that climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Proposed Development, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets. Using Solar Energy UK's estimate of six acres of land required per megawatt of solar power generated, meeting this target in full would require the use of 218,530 hectares of land, which is less than 1% of the UK's total land area. However, this figure does not take into account how the Government estimates that future solar developments will require less land per megawatt (MW) generated (the Proposed Development would require around three acres of land per MW). If, for example, all future developments required four acres per MW, then this would reduce the total amount of UK land required to around 0.6%.</p> <p>As of 2022, around 63.1% of land in England is in agricultural use. This amounts to 8,225,085 hectares of land. Not all solar development will take place in England, nor will it all take place on agricultural land. However, if this were to happen then this would affect less than 3% of agricultural land in England.</p>			
Concern regarding the loss of employment land	<p>As outlined in ES Vol 1 Chapter 14: Socio Economics, Land Use and Tourism [EN010141/DR/6.1], it is estimated that 9 existing jobs in the agricultural sector would be lost as result of the Scheme. The Scheme itself will generate an estimated 20 full time equivalent employee roles over its 40-year lifespan. Although the overall balance of new jobs would have a beneficial impact, they would not be significant.</p>	N	Y	Y
Ecology, wildlife and local environment				
Support for mitigation for ecology and wildlife / Support for biodiversity net gain	<p>ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] outlines the positive effects from the Scheme, due to the establishment of woodlands, hedgerows and grasslands across the Scheme.</p> <p>The Biodiversity Net Gain Report [EN010141/DR/7.17] provides an assessment undertaken utilising Defra's Statutory Biodiversity Metric Calculator ('the Metric') to provide evidence of an achievable on-site gain in biodiversity units. Based on the</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>illustrative design shown on Appendix A Illustrative Landscape Proposals of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7] (which the Scheme must be developed in substantial accordance with) it is anticipated that the Scheme could achieve an overall net gain of approximately 79.51% in area-based habitat units, 36.91% in hedgerow units, and 5.95% in watercourse units.</p> <p>While a 10% gain is not achieved in relation to watercourses, the habitat creation measures as shown on the Illustrative Landscape Proposals and to be secured through the oLEMP [EN010141/DR/7.7] will enhance the bank top habitat of ditches and watercourses throughout the Site, representing a qualitative gain.</p> <p>At the detailed design stage the Applicant will seek to maximise BNG as far as practicable (as per Design Principle 4.1 secured by the Design Parameters and Principles Statement [EN010141/DR/7.1]), and it may be possible to achieve a greater BNG for all habitat types compared to the current assessment of the illustrative design. Nonetheless, as the assessment has been based on an illustrative design, out of caution and to avoid any future compliance issue, the Applicant is electing to claim and commit to a future BNG of:</p> <ul style="list-style-type: none"> • 70% net gain in area-based habitat units; • 30% net gain in hedgerow units; and • 5% in watercourse units. <p>This is less than assessed for the illustrative design, but allows future flexibility if required at the detailed design. The Applicant will endeavour at that stage to meet or even exceed the higher BNG totals as assessed in the BNG Report [EN010141/DR/7.17], particularly with regard to watercourse units.</p> <p>There is currently no mandatory requirement for NSIPs to deliver a statutory BNG.</p>			
Suggestion that the Scheme should deliver more than 10% biodiversity net gain	The Biodiversity Net Gain Report [EN010141/DR/7.17] provides an assessment undertaken utilising Defra's Statutory Biodiversity Metric Calculator ('the Metric') to provide evidence of an achievable on-site gain in biodiversity units. Based on the	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>illustrative design shown on Appendix A Illustrative Landscape Proposals of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7] (which the Scheme must be developed in substantial accordance with) it is anticipated that the Scheme could achieve an overall net gain of approximately 79.51% in area-based habitat units, 36.91% in hedgerow units, and 5.95% in watercourse units.</p> <p>While a 10% gain is not achieved in relation to watercourses, the habitat creation measures as shown on the Illustrative Landscape Proposals and to be secured through the oLEMP [EN010141/DR/7.7] will enhance the bank top habitat of ditches and watercourses throughout the Site, representing a qualitative gain.</p> <p>At the detailed design stage the Applicant will seek to maximise BNG as far as practicable (as per Design Principle 4.1 secured by the Design Parameters and Principles Statement [EN010141/DR/7.1]), and it may be possible to achieve a greater BNG for all habitat types compared to the current assessment of the illustrative design. Nonetheless, as the assessment has been based on an illustrative design, out of caution and to avoid any future compliance issue, the Applicant is electing to claim and commit to a future BNG of:</p> <ul style="list-style-type: none"> • 70% net gain in area-based habitat units; • 30% net gain in hedgerow units; and • 5% in watercourse units. <p>This is less than assessed for the illustrative design, but allows future flexibility if required at the detailed design. The Applicant will endeavour at that stage to meet or even exceed the higher BNG totals as assessed in the BNG Report [EN010141/DR/7.17], particularly with regard to watercourse units.</p> <p>There is currently no mandatory requirement for NSIPs to deliver a statutory BNG.</p>			
Suggestion that the Scheme should incorporate new ponds/bodies of water	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out how the specification for the landscaping proposals. At this time, the Applicant is not	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	proposing to create any new ponds as part of the Scheme, although some existing ponds exist within the Scheme area.			
Suggestion that the mix of wildflower planting plus fescues should be increased (to 40%)	The Applicant has provided indicative seed mixes within the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7] , these are not final and will be adapted and updated in substantial accordance with the oLEMP within a final LEMP to be agreed with the LPA prior to construction.	N	Y	N
Suggestion to focus on creating habitats for Biodiversity Action Plan species	The Scheme's landscape proposals will provide habitat for a range of species across the Site, including BAP species.	Y	Y	N
Concern regarding impact on local environment / Concern regarding impact on wildlife and habitats	<p>The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] provides more information.</p> <p>During construction there would be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation during the construction phase.</p> <p>There would similarly be no significant beneficial or adverse effects on habitats during the construction phase due to the protection of trees and woodland across the Site, and that hedgerow removals would be retained and protected with the exception of 54m of hedgerow that is expected to be removed.</p> <p>For protected species, whilst there would be a range of adverse impacts to species identified as using the Site, due to the established mitigation measures the effects on all species would be not significant.</p> <p>During the operational phase there would continue to be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>There are significant beneficial effects predicted for habitats across the Site due to the establishment of woodlands, hedgerows and grasslands across the Scheme.</p> <p>There would be significant beneficial effects for bird assemblage and foraging and commuting bats due to the extent of habitat creation which should provide substantially increased foraging and commuting opportunities for these species. There would be no significant adverse effects on protected species during the operational phase</p>			
Suggestion to provide habitat for breeding skylarks as part of the Scheme	<p>Mitigation for ground nesting birds has taken an alternative approach to skylark plots. Instead, the provision of high quality species diverse grassland will increase foraging suitability as well as offering nesting habitat. It should be noted that skylark plots are intended to provide 'landing pads' to access foraging land amongst crops and not to provide nesting locations. As such, provision of managed species diverse grassland offers both foraging and nesting habitat. This is further discussed in relation to ground nesting birds at Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>	N	Y	N
Suggestion to include new woodland planting as part of the Scheme	<p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures relative to woodland planting include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; and • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries. 	Y	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Suggestion to create a new community orchard west of Little Staughton as part of the Scheme	The Applicant explored the inclusion of a community orchard within the Scheme however third-party agreements could not be reached to provide this at this location. The community orchard would not align with the long-term land use aspirations beyond the life of the Scheme.	N	Y	N
Concern regarding impact of the Scheme on existing woodland, including ancient woodland at High Wood	<p>The Scheme will not directly impact on High Wood CWS. The Scheme has the potential to provide greater habitat connectivity between the woodland and other grassland, hedgerow and woodland habitats.</p> <p>An assessment of impacts on the designated and non-designated sites is provided in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2] sets out ancient or irreplaceable trees habitat (i.e., ancient woodland, ancient or veteran trees) will not be affected. No irreplaceable habitats are present within the Site.</p>	N	Y	N
Request to avoid Spindle planting near bridleways, as this could be hazardous to horses	The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out the Applicant's suggested approach to planting as part of the Scheme. <i>Euonymus europaeus</i> (Spindle) is included in the indicative species list for native species hedgerow planting stock, but this will be tailored according to the prevalent conditions of the proposed location.	N	Y	N
Suggestion that any whip protectors used for whips and trees should be biodegradable and removed after three years	<p>Tree guards will be installed, monitored and removed in line with the measures in the final LEMP, which will be prepared in substantial accordance with the outline Landscape and Ecological Management Plan [EN010141/DR/7.7]. This will depend on the establishment of planting, and could be earlier than three years, or later than three years.</p> <p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out that three FTE roles will be required to manage the landscape proposals as part of the Scheme.</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Suggestion that invertebrates and known mammals and birds should be included in baseline surveys	The Applicant's baseline ecological surveys are summarised within ES Vol 2 Appendix 7-1 [EN010141/DR/6.2] . The Applicant has surveyed for a number of mammals including badgers, otters and water voles, and has undertaken breeding bird and wintering bird surveys. No surveys have been undertaken for invertebrates due to the likely impacts and effects of the Scheme.	Y	Y	N
Suggestion to include bat highways as part of the Scheme	The Applicant is not proposing to install bat bridges as part of the Scheme, but has carefully considered the potential impacts of the Scheme on bats as part of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] . Whilst short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage and otters is predicted during the construction phase, during the operational phase the Scheme is expected to result in a significant beneficial effect on priority habitats and on foraging and commuting bats, along with beneficial (not significant) effects for other ecological receptors.	N	Y	N
Statement that the proposed environmental and biodiversity mitigation is insufficient	ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] concludes there would be no significant adverse effects on ecological receptors as a result of the Scheme. The Biodiversity Net Gain Report [EN010141/DR/7.17] provides an assessment undertaken utilising Defra's Statutory Biodiversity Metric Calculator ('the Metric') to provide evidence of an achievable on-site gain in biodiversity units. Based on the illustrative design shown on Appendix A Illustrative Landscape Proposals of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7] (which the Scheme must be developed in substantial accordance with) it is anticipated that the Scheme could achieve an overall net gain of approximately 79.51% in area-based habitat units, 36.91% in hedgerow units, and 5.95% in watercourse units. While a 10% gain is not achieved in relation to watercourses, the habitat creation measures as shown on the Illustrative Landscape Proposals and to be secured through	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>the oLEMP [EN010141/DR/7.7] will enhance the bank top habitat of ditches and watercourses throughout the Site, representing a qualitative gain.</p> <p>At the detailed design stage the Applicant will seek to maximise BNG as far as practicable (as per Design Principle 4.1 secured by the Design Parameters and Principles Statement [EN010141/DR/7.1]), and it may be possible to achieve a greater BNG for all habitat types compared to the current assessment of the illustrative design. Nonetheless, as the assessment has been based on an illustrative design, out of caution and to avoid any future compliance issue, the Applicant is electing to claim and commit to a future BNG of:</p> <ul style="list-style-type: none"> • 70% net gain in area-based habitat units; • 30% net gain in hedgerow units; and • 5% in watercourse units. <p>This is less than assessed for the illustrative design, but allows future flexibility if required at the detailed design. The Applicant will endeavour at that stage to meet or even exceed the higher BNG totals as assessed in the BNG Report [EN010141/DR/7.17], particularly with regard to watercourse units.</p> <p>There is currently no mandatory requirement for NSIPs to deliver a statutory BNG.</p>			
Statement that the Scheme represents a net loss for nature	<p>ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] concludes there would be no significant adverse effects on ecological receptors as a result of the Scheme.</p> <p>The Biodiversity Net Gain Report [EN010141/DR/7.17] provides an assessment undertaken utilising Defra's Statutory Biodiversity Metric Calculator ('the Metric') to provide evidence of an achievable on-site gain in biodiversity units. Based on the illustrative design shown on Appendix A Illustrative Landscape Proposals of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7] (which the Scheme must be developed in substantial accordance with) it is anticipated that the</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>Scheme could achieve an overall net gain of approximately 79.51% in area-based habitat units, 36.91% in hedgerow units, and 5.95% in watercourse units.</p> <p>While a 10% gain is not achieved in relation to watercourses, the habitat creation measures as shown on the Illustrative Landscape Proposals and to be secured through the oLEMP [EN010141/DR/7.7] will enhance the bank top habitat of ditches and watercourses throughout the Site, representing a qualitative gain.</p> <p>At the detailed design stage the Applicant will seek to maximise BNG as far as practicable (as per Design Principle 4.1 secured by the Design Parameters and Principles Statement [EN010141/DR/7.1]), and it may be possible to achieve a greater BNG for all habitat types compared to the current assessment of the illustrative design. Nonetheless, as the assessment has been based on an illustrative design, out of caution and to avoid any future compliance issue, the Applicant is electing to claim and commit to a future BNG of:</p> <ul style="list-style-type: none"> • 70% net gain in area-based habitat units; • 30% net gain in hedgerow units; and • 5% in watercourse units. <p>This is less than assessed for the illustrative design, but allows future flexibility if required at the detailed design. The Applicant will endeavour at that stage to meet or even exceed the higher BNG totals as assessed in the BNG Report [EN010141/DR/7.17], particularly with regard to watercourse units.</p> <p>There is currently no mandatory requirement for NSIPs to deliver a statutory BNG.</p>			
Concern that the land will not recover nutrients and wildlife	<p>The Scheme will take agricultural land out of arable use and transition to grassland, as shown on the ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] and set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7]. This would have a benefit in carbon sequestration and soil recovery in the long-term and deliver multiple ecosystem services during the operational phase of the Scheme.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.			
Suggestion to manage the land beneath solar panels sensitively, including reduced or no use of pesticides and seeding pollinator and bird-friendly species	The grasslands beneath the solar panels will be managed in accordance with a final LEMP, which will be in substantial accordance with the oLEMP [EN010141/DR/7.7] submitted with the application. The Applicant is not proposing to use pesticides.	Y	Y	N
Concern about compaction of land	The Applicant has prepared an outline Soil Management Plan [EN010141/DR/7.9] which sets out measures that will be adopted during each phase of the Scheme to protect and manage soils, and minimise any compaction of the land.	N	Y	N
Concern regarding loss of hedgerows	Table 2-34 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] sets out the anticipated hedgerow removal and reinstatement timeframes as part of the Scheme. This corresponds to ES Vol 3 Figure 2-6 Indicative Vegetation Clearance [EN010141/DR/6.3] . Hedgerows would be replanted in accordance with the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] . As set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] , the Applicant is proposing over 17km of new hedgerows as part of the Scheme, which will be a permanent benefit of the Scheme.	Y	Y	N
Concern regarding impact of construction on wildlife	The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] provides more information.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>During construction there would be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation during the construction phase.</p> <p>There would similarly be no significant beneficial or adverse effects on habitats during the construction phase due to the protection of trees and woodland across the Site, and that hedgerow removals would be retained and protected with the exception of 54m of hedgerow that is expected to be removed.</p> <p>For protected species, whilst there would be a range of adverse impacts to species identified as using the Site, due to the established mitigation measures the effects on all species would be not significant.</p> <p>During the operational phase there would continue to be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation.</p> <p>There are significant beneficial effects predicted for habitats across the Site due to the establishment of woodlands, hedgerows and grasslands across the Scheme.</p> <p>There would be significant beneficial effects for bird assemblage and foraging and commuting bats due to the extent of habitat creation which should provide substantially increased foraging and commuting opportunities for these species. There would be no significant adverse effects on protected species during the operational phase</p>			
Concern regarding the impact of fencing on wildlife movements	<p>The Applicant has assessed the impact on ecological receptors within ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>Mammal gates are proposed within all solar fencelines to minimise the impact on small mammals moving around the Site, as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>	N	Y	Y
Hydrology and flooding				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Statement that the installation of solar panels will increase surface runoff, impacting drainage systems and increasing local flood risk	<p>The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]. This concludes that the Scheme will not increase flood risk off-site in any way.</p> <p>The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how surface water and the Scheme drainage will be managed throughout construction, operation and decommissioning.</p>	N	Y	Y
General concern regarding increased flood risk	The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2] . This concludes that the Scheme will not increase flood risk in any way.	N	Y	Y
Statement that local roads are already prone to flooding	The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2] . This concludes that the Scheme will not increase flood risk off-site in any way.	N	Y	Y
Statement that the Scheme may lead to larger volumes of water impacting downstream, raising the risk of flooding along the Pertenhall Brook and to the River Kym	<p>The Applicant has assessed flood risk as part of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]. This concludes that the Scheme will not increase flood risk off-site in any way.</p> <p>The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how surface water and the Scheme drainage will be managed throughout construction, operation and decommissioning.</p>	N	Y	Y
Concern regarding water contamination due to runoff from solar panels / Concern that hazardous materials from panels and cleaning of solar	The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] which sets out how surface water and the Scheme drainage will be managed throughout construction, operation and decommissioning.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
panels will enter drinking water supplies	<p>The Applicant notes the concern raised regarding the potential presence of hazardous materials in solar panels and battery energy storage systems (BESS). The specific technologies to be deployed will comply with all relevant UK and international standards.</p> <p>The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Waste Management Plan [EN010141/DR/7.12] that set out how materials will be handled, stored and disposed of in line with relevant regulations.</p>			
Suggestions for how the Scheme could incorporate robust flood mitigation, such as through monitoring devices, remote sensors and early-warning systems	<p>The Applicant has prepared an outline Surface Water Management Plan [EN010141/DR/7.13] that sets out how surface water will be managed to minimise run-off.</p> <p>As set out in ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2], the Scheme has been designed such that it is not at risk of flooding, and therefore monitoring devices and remote sensors are not anticipated.</p> <p>During the construction phase, the Applicant will appoint a 'Flood Warden' who will be responsible for the preparation, management, and response to flood incidents, inclusive of reacting to flood warnings and alerts.</p>	N	Y	N
Cultural heritage and archaeology				
Statement that the Scheme does not take into account the history of the village [Little Staughton and Pertenhall]	<p>ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a detailed desk-based assessment and settings assessment which describe the historic development and archaeological resource of the area. This work identifies heritage assets within the villages, including designated assets such as the Grade I listed Church of All Saints in Little Staughton, the Grade I listed Church of St Peter in Pertenhall, and a range of Grade II listed farmhouses, cottages and associated structures.</p> <p>The ES also records the archaeological and historic landscape context of both settlements, including evidence of medieval and post-medieval settlement shrinkage,</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	ridge and furrow, moated sites, and historic routeways which are integral to the character of the villages. These have been assessed both for potential direct impacts and for effects on their settings.			
Concern regarding loss of character	ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a comprehensive cultural heritage assessment which considers how the Scheme may affect the historic environment, including both designated and non-designated assets and their settings. Historic landscape features, settlement patterns, and the contribution these make to local character have been identified and taken into account through design evolution, embedded mitigation, and proposed enhancement measures.	N	Y	Y
Statement that there is no consideration for local cultural sites	ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a detailed cultural heritage assessment, informed by desk-based research, site visits, consultation with Historic England and local authority heritage officers, and geophysical and trial trenching surveys. This assessment identifies and considers the significance of both designated and non-designated heritage assets, including churches, farmhouses, historic routeways, moated sites, ridge and furrow, and other cultural features within and around the Scheme. Potential direct and indirect impacts on these cultural sites have been assessed, and appropriate mitigation and enhancement measures are secured through the Outline Archaeological Mitigation Strategy [EN010141/DR/7.15] and outline Heritage Enhancement Strategy [EN010141/DR/7.16] . On this basis, the Scheme has given full consideration to local cultural sites and includes measures to protect, record, and enhance understanding of them.	N	Y	Y
Concern regarding the impact of the Scheme on listed buildings	ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a comprehensive assessment of designated heritage assets within 3 km of the Scheme (and beyond where agreed through consultation), including Grade I, Grade II* and Grade II listed buildings. The assessment considered both direct and indirect effects, including	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	<p>impacts on setting, supported by site visits, historic research, and representative visualisations.</p> <p>The majority of listed buildings are screened from the Scheme by distance, landform and existing vegetation, with additional mitigation provided through new hedgerow and woodland planting. No substantial harm to the significance of any listed building has been identified; where minor adverse effects are predicted, these are limited and not significant in EIA terms.</p>			
Concern regarding the impact of the Scheme on areas of archaeological sensitivity	<p>ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] includes a detailed desk-based assessment, geophysical surveys, trial trenching, and consultation with the Bedford Borough and Cambridgeshire Historic Environment Teams. This work has identified areas of archaeological potential within the Order Limits, including prehistoric, Roman, medieval and post-medieval remains.</p> <p>A particular focus of assessment has been the newly designated scheduled monument of the Roman Small Town south of Great Staughton, located within the northern part of Site C. This nationally important site has been subject to geophysical survey and targeted trial trenching to confirm its extent and character.</p> <p>The Scheme layout has been informed by this evidence, with embedded mitigation such as the avoidance of sensitive areas, use of 'no-dig' construction techniques where appropriate, and the creation of buffer zones. Further mitigation is secured through the outline Archaeological Mitigation Strategy [EN010141/DR/7.15], which sets out measures for preservation in situ, targeted excavation, and recording where required.</p>	N	Y	Y
Statement that further archaeological assessments are required to determine the location of other areas of historic and archaeological sensitivity	<p>A comprehensive programme of archaeological investigation has already been undertaken, including desk-based assessment, geophysical survey, walkover survey and trial trenching across the main development areas. This work has identified and characterised known areas of historic and archaeological sensitivity, such as the Roman Small Town Scheduled Monument and areas of medieval settlement and ridge and furrow.</p>	N	Y	N

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	The outline Archaeological Mitigation Strategy [EN010141/DR/7.15] sets out a programme of further archaeological investigation that would be undertaken prior to construction.			
Suggestion to route underground cabling away from Roman Small Town scheduled monument	The Applicant is proposing to use Horizontal Direction Drilling (HDD) to lay the underground cables in the vicinity of the Roman Small Town scheduled monument. Details of the proposed HDD method, including location of the launch and receiving pits and depth are detailed within the outline Archaeological Mitigation Strategy [EN010141/DR/7.15] .	N	Y	N
Support for the changes made to the Scheme due to archaeological findings	<p>Following non-statutory consultation, archaeological survey work has identified the probable site of a previously unknown Roman town to the north and east of New Wood within Site C. This archaeological feature is of be of national importance as a scheduled monument.</p> <p>As a result of this find, the Applicant is no longer proposing to build solar panels on any of the land included within the area that has now been designated as a scheduled monument, and it is instead proposing species-diverse grassland planting for ecological and archaeological benefit.</p> <p>An outline Heritage Enhancement Strategy [EN010141/DR/7.16] has been produced which contains measures for making a positive contribution to the historic environment.</p>	N	Y	N
Suggestion that that an outdoor heritage museum with visitor centre facilities should be created as part of the Scheme	<p>An outline Heritage Enhancement Strategy [EN010141/DR/7.16] has been produced which contains measures for making a positive contribution to the historic environment.</p> <p>The Applicant is not proposing an outdoor heritage museum or visitor centre facilities as part of the Scheme at this time.</p>	N	Y	N
Glint and glare				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
General concern regarding glint and glare	<p>ES Vol 2 Appendix 5-7 Glint and Glare Assessment [EN010141/DR/6.2] considers effects on ground-based receptors (residential, rail, road, and bridleway) within 1km, whilst a 30km study area is considered for aviation receptors.</p> <p>The assessment concludes that due to the existing screening and / or proposed screening in the landscape, glint and glare impacts would be acceptable. There is therefore no additional mitigation proposed to reduce glint and glare effects over and above the embedded landscape proposals.</p>	N	Y	Y
Concern regarding the impact of glint and glare on aviation	<p>ES Vol 2 Appendix 5-7 Glint and Glare Assessment [EN010141/DR/6.2] considers effects on ground-based receptors (residential, rail, road, and bridleway) within 1km, whilst a 30km study area is considered for aviation receptors.</p> <p>The assessment concludes that due to the existing screening and / or proposed screening in the landscape, glint and glare impacts would be acceptable. There is therefore no additional mitigation proposed to reduce glint and glare effects over and above the embedded landscape proposals.</p>	N	Y	N
Concern regarding the impact of glint and glare birds	<p>The solar panels will include anti-reflective coatings to maximise the absorption of sunlight and minimise reflectivity. Panels typically reflect less light than common materials such as water or glass.</p> <p>The reflectivity of panels is low and does not create conditions that would confuse or disorient birds. This conclusion is consistent with published research and the experience of operational solar farms in the UK and internationally, which show no evidence of significant adverse effects on bird populations from glint and glare.</p>	N	Y	N
Concern regarding the impact of glint and glare on bridleways	<p>ES Vol 2 Appendix 5-7 Glint and Glare Assessment [EN010141/DR/6.2] considers effects on ground-based receptors (residential, rail, road, and bridleway) within 1km, whilst a 30km study area is considered for aviation receptors.</p>	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
	The assessment concludes that due to the existing screening and / or proposed screening in the landscape, glint and glare impacts would be acceptable. There is therefore no additional mitigation proposed to reduce glint and glare effects over and above the embedded landscape proposals.			
Manufacturing				
Concern regarding human rights issues associated with manufacturing solar panels	<p>The Applicant has Anti-slavery & Human Trafficking and Human Rights Guidance Policies that govern all of its operations. It is also a signatory to Solar Energy UK's industry supply chain statement, which states that "We, members of the UK solar energy industry, condemn and oppose any abuse of human rights, including forced labour, anywhere in the global supply chain. We support applying the highest possible levels of transparency and sustainability throughout the value chain, and commit to the development of an industry-led traceability protocol to help to ensure our supply chain is free of human rights abuses."</p> <p>Ethical and sustainable procurement form core strategies within the outline Skills, Supply Chain and Employment Plan [EN010141/DR/7.11].</p>	N	Y	Y
Assumption that solar panels will be imported from China / Concerns regarding panels being imported	Whilst the Applicant is unable to confirm where the solar panels for the Scheme would be sourced from, as part of its environmental assessments it has assumed that they would be sourced from China. ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [EN010141/DR/6.2] assumes that the panels will be manufactured and transported from China.	N	Y	Y
Security concerns relating to sourcing solar panels from overseas	Solar modules are passive devices with no data-processing capability. Where equipment contains control systems, these will be subject to the Scheme's cyber-security controls (e.g. network segregation, controlled remote access, patch management) in line with industry best practice and the requirements of the grid operator.	N	Y	Y

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern that the panels will not be recyclable	<p>The Applicant has provided an updated assessment of potential waste impacts in Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p> <p>Waste will be managed in accordance with the outline Waste Management Plan [EN010141/DR/7.12], as well as the outline Construction Environmental Management Plan [EN010141/DR/7.3], outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p> <p>The Applicant notes the decision by the Secretary of State in determining the East Yorkshire Solar Farm DCO (ExA report ref 3.13.50 and 3.13.51) that although the capacity of facilities to handle decommissioned solar PV panels is still developing, the recycling industry is likely to respond to demand over time.</p>	N	Y	N
Concern regarding toxic chemicals in solar panels	<p>The Applicant notes the concern raised regarding the potential presence of hazardous materials in solar panels and battery energy storage systems (BESS). The specific technologies to be deployed will comply with all relevant UK and international standards.</p> <p>The Applicant has prepared an outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5] and outline Waste Management Plan [EN010141/DR/7.12] that set out how materials will be handled, stored and disposed of in line with relevant regulations.</p>	N	Y	Y
Concern regarding the carbon footprint of solar panels / Concern regarding CO ₂ emissions in manufacturing / Statement that solar farms are not environmentally friendly	<p>As part of ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1], the Applicant has undertaken a greenhouse gas assessment that considers the construction, operation and decommissioning phases. This includes an assessment of the embodied carbon required for the Scheme. This assessment concludes that the Scheme will result in a significant net benefit with regards carbon emissions to the atmosphere.</p>	N	Y	Y
Security				

Summary of issue	Brockwell Storage and Solar's response (including the regard had to the consultation feedback)	Change Y/N?	S47	S42(d)
Concern regarding increased criminal activity due to the Scheme	The Scheme design incorporates appropriate security measures in line with industry best practice, including perimeter fencing, monitored access points, and CCTV. These measures are intended both to protect the facility and to deter unauthorised access. The Applicant will also liaise with the local police and to ensure that security measures and responses are proportionate and effective.	N	Y	Y
Concern regarding theft of cables	Cable theft is recognised as a risk for infrastructure projects, and the Scheme has been designed with appropriate security measures to minimise this risk. These measures include secure perimeter fencing, monitored access points, CCTV, and use of underground cabling where practicable, which significantly reduces accessibility.	N	Y	N

APPENDIX 5-3 CONSULTATION REPORT APPENDIX 5-3: REGARD HAD TO NON-PRESCRIBED CONSULTEE RESPONSES [EN010141/DR/5.2]

Table 1.1: Active Travel England

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Consultation	In relation to the planning consultation and on the basis of the information available, Active Travel England is content with the development proposed.	N	The Applicant notes these comments.

Table 1.2: Ben Obese-Jecty MP

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Impact on local area, impact on villages	<p>The impact of the Solar Farm will be felt in those communities in the immediate vicinity of the site, specifically the villages and parishes of Great Staughton and Hail Weston within the Huntingdon constituency.</p> <p>Having spoken with concerned local residents, as well as the local group which has led the campaign against the solar farm's construction, Stop East Park Energy, I am writing to reflect their concerns and disappointment that the scheme is moving ahead with little in the way of changes to the original proposal.</p>	N	<p>The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. The Preliminary Environmental Information Report (PEIR) published at the statutory consultation clearly sets out the potential impacts of the Scheme during construction, operation and decommissioning and, where possible has set out a range of measures to prevent, reduce or offset any adverse impacts in the Environmental Statement [EN010141/DR/6.1 / 6.2 / 6.3] included in the development consent order application.</p> <p>Feedback to the 2023 non-statutory consultation feedback, along with survey works, resulted in several changes to the proposals at the statutory consultation changes. An array of further changes were made following the 2024 statutory consultation, as set out in this Consultation Report.</p>
		Visual impact, landscape and character	<p>On behalf of my constituents in Huntingdon and those communities in Great Staughton and Hail Weston as well as those across the constituency boundary in North Bedfordshire, that stand to be impacted I am seeking to outline the, specifically:</p> <p>The visual impact upon the character of the landscape surrounding Great Staughton and Hail</p>	N	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			Weston, at 1,900 acres, will have a detrimental impact upon the quality of life of local residents, potentially causing stress and anxiety to those most impacted by the plans.		<p>[EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Overall, ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] concludes that despite the extent of the Scheme, significant landscape and visual effects would be relatively limited in number and largely confined to receptors in close proximity to the Site. Proposed mitigation would integrate the Scheme into the existing landscape and visual setting by year 10 of operation, with no residual significant effects on landscape character identified. Residually significant visual effects that have been identified at Year 10 predominantly associated with public rights of way in closest proximity to the Scheme, but including some more elevated views within 1km of the Site.</p>
		Traffic, construction disruption,	The disruption of three years of large-scale industrial traffic around the sites, particularly increased construction traffic and HGVs on the B645, despite efforts to divert traffic onto site prior to entering Great Staughton.	N	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.
		Location, loss of agricultural land, return of land to previous use	The proposed location of the Solar Farm uses significant quantities of Best and Most Versatile Land (Grade 2 and Grade 3a) which though it might be reverted to its existing agricultural condition upon completion, it will take the land out of use for potentially two generations.	N	As set out in ES Vol 2 Appendix 3-2 Land Identification Report [EN010141/DR/6.2] the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.
		Community benefit	Concerns have also been highlighted regarding the lack of community benefit; particularly that local residents are unable to directly benefit from close proximity to the solar farm by way of cheaper energy bills, and that the proposed	N	At the 2024 statutory consultation, the Applicant set out three potential models for how community benefit could be delivered as part of the Scheme. Following the consultation, the Applicant subsequently

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			legacy fund will be insufficient to effect change once split between five parishes.		<p>announced its intention to deliver community benefit funding in excess of any of the options consulted on previously.</p> <p>As the Scheme will connect directly into the electricity transmission network, it is not possible for local residents to benefit directly from the power generated by it. This is because the power will be moved around the network to suit demand. However, residents will benefit from the long-term benefits that will arise as part of the Scheme, including increased energy security as a result of reduced reliance on imported oil and gas from overseas.</p> <p>The benefits of the Scheme are set out in Section 5.0 of the Planning Statement [EN010141/DR/5.3].</p>

Table 1.3: British Horse Society Bedfordshire

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Equestrian access, Public Rights of Way	I would note that the BHS expresses no view on the suitability of this site for such development. Our position is to consider the impact on equestrian access and as the proposals currently stand the Society strongly objects to	N	The Applicant has incorporated many measures to protect safety on PRowS during all of the Scheme's phases, as set out in the

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>the development on the grounds that equestrian access is not safeguarded during construction and that no attempt has been made to improve equestrian access despite both national and local policy to do so.</p> <p>I have attached a marked up copy of the Bedfordshire section of the Public Rights of Way ("PRoW") map from your consultation library (Figure 9-1) which highlights:</p> <ul style="list-style-type: none"> • In green, those PRoW that are equestrian routes – byway or bridleway • In blue, a route that has been identified as a further potential Definitive Map Modification Order ("DMMO") though no application has yet been submitted. 		outline Public Rights of Way Management Plan [EN010141/DR/7.8].
		Public Rights of Way	<p>There is a potential further equestrian PRoW in Bedfordshire, in that a DMMO application has been submitted and may well be determined prior to the submission of the Development Consent Order ("DCO"). This route is the continuation of the Staploe BW43 near Sharps Barn to join with BWs 31 and 44 to the west and crosses the cable corridor north of Duloe.</p> <p>Please note that Figure 9-1 appears to omit Byway 9 in Little Staughton (along the border of Site B) and the section on Bolnhurst & Keysoe BW37/Pertenhall BW26 which runs from the top of the farm access drive along the track into and through the Manor Farm farmyard at Green End,</p>	N	The Applicant is aware of one DMMO application that intersects the Site (Case Number M206 - LH) to create a bridleway. The Applicant would not object to the creation of a public right of way along this route, or to potential future permissive path provision in this location.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			parallel to FP18. I will refer to BW37/26, being the whole of the route from Green End to the far eastern end of the development, and to Byway 9 for ease, rather than the full names including parishes.		
		Public Rights of Way, construction access, visual impact	<p>It is proposed to use almost the entire length of BW37/26 for construction access, as traffic will enter Site A via the access drive and turn onto BW37/26, turning left (west) to access Arrays 10 and 11 or right (east) to access Arrays 12 and 13. I am referring to the Array numbers shown on the panel area labels Figure 4.</p> <p>I am aware that Bolnhurst and Keysoe Parish Council have requested the relocation of the panels that are in Array 11 – a request that the BHS supports in that the positioning of these panels has an extremely adverse impact on the enjoyment of the views from the ridgeline section of BW37/26.</p>	N	<p>The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] that sets out how the bridleways through the Site will be managed during the construction phase.</p> <p>The Applicant has reviewed the layout of the panels in the area noted by Bolnhurst and Keysoe Parish Council and set the panels back further from the bridleway to allow for a wider belt of planting between the PRoW and the solar arrays.</p> <p>The approach to the design of the Scheme is set out in the Design Approach Document [EN010141/DR/5.6].</p> <p>An assessment of landscape impacts and effects is provided in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>
		Safety, construction traffic, noise and vibration, disruption associated	I would hope that the potential safety issues of a horse encountering a delivery HGV or van, especially when also encountering noise and vibration from construction, would be self-evident but I am happy to expand if necessary. I do acknowledge that in all likelihood most horse	N	The Applicant notes these comments. The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be managed across the construction phase.

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		with construction	<p>riders will just avoid riding in the area whilst the construction work is in hand as most can access other parts of the PRow network without too much difficulty. But horses kept at properties on the B660 would have to use quite a lot of extra roadwork to do so and would lose what is currently a regular hacking circuit, that includes both BW37/26 and BW40. There are over 20 acres of horse paddocks in properties between Pentland House and the Riseley Road turnoff.</p> <p>In order to avoid adverse interactions between horses and HGVs (and indeed transit vans etc) on this bridleway there are essentially three options:</p> <ol style="list-style-type: none"> 1. Continue to allow both horses and HGVs/vans to use the bridleway and operate a banksman system to ensure that when horses are on the bridleway, HGV movements are halted – given the length of the bridleway this could be quite manpower intensive; 2. Divert the HGVs/vans to another route with less interaction with horses – there would still be some interactions, largely at points where bridleways cross the access roads, but I think probably easier to manage; or 3. Divert the horses to another temporary route away from the bridleways and traffic – this would of course require landowner permission but might be easier to obtain than a diverted 		Proposed measures in relation to BW37 are set out in Section 6.8 of the management plan.

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			construction access road and probably cheaper too!		
		Access, bridleways, safety, construction traffic	Access to Array 10 is only a short distance of about 100m along the bridleway and, given the relatively small size of this array, I accept that this exposure could be managed successfully via banksman at the top of the access drive, stopping traffic if horses were seen, plus appropriate warning signs.	N	The Applicant notes these comments. The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be managed across the construction phase.
		Access, bridleways, safety, construction traffic	<p>Access to Array 11 for construction traffic using nearly 2km of public bridleway (BW37/26) is unacceptable and an alternative must be found. I suspect that the easiest solution is to send such traffic to Array 11 via Array 12.</p> <p>Alternatively, if you don't consider such an approach feasible, then an alternative temporary bridleway diversion away from the construction traffic should be offered</p>	N	The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be managed across the construction phase. Proposed measures in relation to BW37 are set out in Section 6.8 of the management plan.
		Access, bridleways, safety, construction traffic, Public Rights of Way	<p>Access to Array 12 and 13 involves turning north at the end of the access drive and through the farmyard, all of which is part of BW37/26 and amounts to a distance of about 300m.</p> <p>My preference would be to provide an alternative equestrian route to the north of BW37/26 from near the end of the access drive north to Green End Road. Much of such a diversion would be</p>	N	<p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road and public right of way network where possible as part of the Scheme.</p> <p>The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be</p>

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			<p>separated from the construction traffic by a hedge – an extra safety benefit. There would be crossings involved which would need to be managed but in much more precise locations rather than over the length of the bridleway.</p> <p>It might be considered that the farmyard area is wide enough to accommodate both construction traffic and a route for PRow users. I am sceptical but open to suggestions as to how this could be achieved.</p> <p>In developing alternative proposals don't forget BW40 which crosses BW37/26 near Middle Lodge – if you take my proposal to divert traffic for Array 11 via Array 12, horses on that bridleway will cross the traffic route further north on BW40.</p> <p>In site B there are no bridleways, but I note that the approach of avoiding using PRow for access has been adopted with access tracks running parallel with PRowS (though Little Staughton FP8 seems to be an exception).</p>		<p>managed across the construction phase. Proposed measures in relation to BW37 are set out in Section 6.8 of the management plan.</p>
		Construction traffic, site access, safety, bridleways	<p>In the original masterplan presented in autumn 2023, all construction traffic was to enter the site in Cambridgeshire and then proceed off-road to the Bedfordshire sites B and A, with only a few crossings of local roads.</p> <p>But the current proposals involve the use of two sections of Great Staughton Road (all traffic to sites B and A on one and traffic for the northern</p>	N	<p>The approach to construction access is set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and in ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p> <p>The Applicant has prepared an outline Construction Traffic Management Plan [EN010141/DR/7.4] that sets out how traffic</p>

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			<p>section of Array 6 on the other) and Green End Road in Little Staughton (to access the northern section of Array 6 and Array 8 I assume).</p> <p>I fully expect that, in practice, traffic to the northern part of Array 6 will in fact use the whole route along Great Staughton Road.</p> <p>Both roads are currently used by horse riders (and cyclists) – indeed there is a livery yard on Great Staughton Road at Hawthorn Stables whose only access to the equestrian rights of way network is via these roads.</p> <p>Similar safety concerns apply to roads as to those for the use of bridleways for access. The BHS insists that the internal construction road originally proposed be reinstated.</p> <p>I appreciate that this will require negotiation with landowners or exercise of compulsion which I believe you have available to you.</p> <p>I do not understand why the western section of GSR needs to be used – a crossing point would be sufficient (or possibly two) to access the northern part of Array 6. And access to Array 8 could be via Array 7.</p> <p>In the, hopefully unlikely, event that you are unable to secure access between Sites C and B off road (though this option is much preferred), would it be possible to secure a temporary right of way on the headland of the fields alongside Great Staughton Road, with a safe and</p>		<p>will be managed through the construction phase.</p> <p>The Applicant explored the possibility of routing construction traffic over fields instead of utilising the section of Great Staughton Road, however no agreement could be reached to do so. The Applicant has fully assessed the impacts of taking traffic along the section of Great Staughton Road and these effects are not significant.</p>

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			<p>reasonably direct access for riders based at Hawthorn Stables?</p> <p>I have considered whether my objective could be addressed by the use of the verge alongside Great Staughton Road as it is quite wide in places. It is very uneven so would require some work to make it suitable and there is a deep ditch to the side – which a frightened horse might spook into.</p> <p>The verge is not suitable for the whole length of the sections of road being used. It would be much safer for there to be a hedge between horses and vehicles.</p>		
		Visual impact, equestrian users, Public Rights of Way	<p>The views presented in the consultation documentation do not fully represent the impact on equestrian users (or of PRow users in general). The limited photomontages do not address the impact on bridleway users.</p> <p>I would like to see photomontages from visual receptors numbers 8, 9, 12, 13, 17, 18, 26, 31, and 34 (from Figure 5-4a) plus additional views:</p> <ul style="list-style-type: none"> • from the bridleway between 9 and 12 (currently a wide open 360 panorama) • from the bridleway between 21 and 23 (from memory the key view will be just before the bridleway starts to descend towards the road) 	N	<p>The assessment of the effects on specific visual receptors is underpinned by a detailed assessment of the visual effects of the Scheme at selected representative viewpoints. These representative viewpoints and their associated visualisations provide a detailed insight into the anticipated appearance of the visual effects likely to occur as a result of the Scheme in specific locations.</p> <p>These are produced by visualisation specialists following the methodology and criteria based on the non-prescriptive Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3), and the Landscape Institute's guidance on Visualisation of Development Proposals.</p>

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			<ul style="list-style-type: none"> • from the bridleway heading up towards point 9 from the Riseley Road (after crossing the first field on the route) 		<p>More detail can be found in ES Vol 2 Appendix 5-2: ZTV and Visualisation Methodology [EN010141/DR/6.2].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>The Applicant is proposing a number of measures to mitigate the visual impacts of the proposals, including the creation of 'Green Lanes' where public rights of way are set within open 20 metre wide corridors bounded by hedgerows and woodland blocks for visual screening, landscape integration, and habitat connectivity purposes.</p> <p>The Applicant is also incorporating the sensitive design of landscape treatment along public rights of way on more elevated ground, such as west of Little Staughton, to ensure footpaths are not enclosed by vegetation and that intermittent views out across the Kym Valley to the north are available.</p>

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					The approach to design is set out in the Design Approach Document [EN010141/DR/5.6] .
		Glint and glare, bridleways, screening and mitigation	<p>The consultation documentation makes it clear that local bridleways will be subject to significant adverse glint and glare impacts. 79 bridleway receptors assessed as High impact (potential for afterimage). We accept that this impact can be reduced and even perhaps eliminated by mitigation in the form of screening planting.</p> <p>But this mitigation will take a minimum of 10 years to take full effect.</p> <p>The Society encourages you to seek to plant the screening hedges as soon as possible within the project and not to leave it until the site is operational as appears to be the current plan.</p>		<p>The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] sets out how the landscape proposals will be implemented. The proposed landscaping will be completed prior to the end of the construction phase and the first full year of operation.</p> <p>ES Vol 2 Appendix 5-7 Glint and Glare Assessment [EN010141/DR/6.2] considers effects on ground-based receptors (residential, rail, road, and bridleway) within 1km, whilst a 30km study area is considered for aviation receptors.</p> <p>The assessment concludes that due to the existing screening and / or proposed screening in the landscape, glint and glare impacts would be acceptable. There is therefore no additional mitigation proposed to reduce glint and glare effects over and above the embedded landscape proposals.</p>
		Noise, bridleways, mitigation	The PEIR assessment of noise does not appear to address the impact on users of the rights of way. Users of public rights of way, including horses, are sensitive to noise. Experience from the existing site is that a humming sound can be		ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Scheme.

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			<p>heard on BW37/26 as the site is passed. Whilst this is annoying and can distract horses, it is only for a fairly short period of time. I struggle to fully understand the contours presented in Appendix 10.4, but it does it would appear that noise may be audible on most of the bridleways affected. Given the scale of this site, the noises will be heard along a greater length of the route than is the case with the current site.</p> <p>The inverters and transformers and any other noise emitters should ideally be placed as far as possible away from bridleways and potential mitigation should be considered.</p>		<p>Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area.</p> <p>Section 10.8 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] includes an assessment of noise impacts during construction and operation on public rights of way users.</p> <p>An outline Construction Environmental Management Plan [EN010141/DR/7.3] has been developed as a requirement of the DCO application and outlines how construction activities will be managed throughout the construction process.</p> <p>The outline Construction Environmental Management Plan [EN010141/DR/7.3] sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance.</p>
		Government policy, National Planning Policy	<p>National Planning Policy Framework paragraph 104 states:</p> <p><i>Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to</i></p>	N	<p>The Applicant notes this comment. The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be managed across the construction phase to protect users.</p>

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			<p><i>existing rights of way networks including National Trails.</i></p> <p>The Bedford Borough RoWIP 2025-30 which has just been finalised (but not yet published, although essentially the same as the previous one) states, under Aim 3 – Develop a better connected and safe PRow network:</p> <p><i>C Identify opportunities to increase the size of the bridleway network to provide more links and loops for the benefit of walking, wheeling, cycling and equestrians.</i></p> <p><i>D Identify opportunities to introduce Restricted Byways to provide routes for all non-motorised users I appreciate that this development, as a National Infrastructure project, is to be determined via a Development Consent Order and not through the normal Council planning process. Nonetheless, these policies should, in the Society's view, still form part of the criteria applied.</i></p>		The Scheme includes enhancements for public rights of way users including a number of permissive paths, as set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
		Equestrian users, local community, community benefit	<p>There are many reasons why horses should be included within the plans and not excluded.</p> <p>Perhaps most importantly from your point of view, it is an opportunity to 'give back' something to the community that has been seriously affected by the development. In particular, it would provide some compensation to the equestrian users adversely affected by the development.</p>	N	The Applicant notes these comments.

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		Road safety, equestrian users	<p>Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. The BHS collates statistics each year to understand the rate of incidents involving horses and riders on UK roads and estimate that only about 10% of such incidents are reported to it.</p> <p>With increasing traffic levels, despite our attempts to educate drivers and changes to the Highway Code in January 2022, these sad statistics will likely only reduce significantly when a fully integrated off-road equestrian network is available. You have the chance to create that at least for 40 years in this area.</p>	N	<p>Safety for local communities is a key priority for the Applicant during the construction, operation and decommissioning of the Scheme.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has also been produced as part of the application.</p>
		Economic impact	<p>Northeast Bedfordshire is home to a very 'horsey' community and supports a wide range of economic activity in the area – from farriers, feed merchants to vets and instructors. Nationally, equestrianism is the second largest rural employer after agriculture. It is estimated that leisure horses contribute about £70m pa to Bedfordshire's economy.</p>	N	The Applicant notes these comments.
		Health and wellbeing	<p>The Equestrian Access Forum's report Making Ways for Horses highlights the importance of horse riding for health and well-being. Every opportunity should be taken to benefit as many</p>	N	The Applicant notes these comments.

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			people as possible including those least active in the population (NHS, 2019). Therapeutic and physical benefits of horse riding and carriage driving have been proven for people with disabilities (Favali and Milton, 2010). 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health.		
		Equestrian users, local community	According to Church et al (2010) over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity. There is therefore a risk of gender discrimination if horse riders and carriage drivers are excluded.	N	The Applicant notes these comments.
		Security	Looking forward, creating a network of equestrian routes within the site could assist with security. Beds Police has a Horse watch volunteering scheme where trained volunteers carry out patrols in their local neighbourhoods to provide visible reassurance to residents as well as deterring criminal activity. Clearly you will have your own security contractors but there is an opportunity to also involve the community.	N	The Applicant notes these comments. The Applicant has considered security in its design of the Scheme. The Applicant will be happy to considering working with Bedfordshire Police and the community on any security programmes.

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		Bridleways, byways	<p>The BHS recommends that you create a network of restricted byways and bridleways throughout the site, creating an exemplar of how such large-scale solar farms can create benefit to the local community and the public at large. The provision of restricted byways (available to carriage drivers, horse riders, cyclists and pedestrians – but not motor vehicles) and bridleways offers maximum value in that more users benefit.</p> <p>Proposals:</p> <ul style="list-style-type: none"> • Provide a dedicated bridleway that links Byway 9 to B&K BW40, saving approximately 4km of road work for equestrians riding a circuit as described in our response to your non-statutory consultation last year. • All other footpaths to be upgraded to a minimum of bridleway status on a permissive basis until decommissioning commences and add some further permissive links within the site to avoid creating dead-ends. • Creation of a restricted byway network around much of the perimeter of site A, also on a permissive basis until decommissioning commences. 		<p>The Scheme has been designed to maintain all existing PRow and, where necessary, provide appropriate diversions during construction to ensure continued connectivity for users. However, the Scheme does not include permanent upgrades of PRow to bridleways. The Applicant is nevertheless committed to ensuring that existing PRow remain safe, accessible, and appropriately managed during both construction and operation.</p> <p>The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p>

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		Bridleways, access, equestrian users	<p>The rationale for the dedicated bridleway is that this connection is needed on a permanent basis in that it bridges a gap within the existing network and offers a great benefit in terms of road safety for horse riders (and off-road cyclists). The map shows the circuit ridden (without the linking road section). This is a popular hacking route, being about 10 to 12 miles (or two hours) long.</p> <p>The landowner has permitted access along the farm tracks from Green End Road to the B660 to certain local riders, although that permission has, I understand, recently been withdrawn. I have proposed a route using the footpaths (which is very slightly different from the former permissive route which used some tracks instead in places) because I consider it more suitable both for the site operator and for riders.</p> <p>There would be a small amount of work required to make the route available to horses – the widening of the gaps next to three gates and the replacement of one bridge/culvert, I believe.</p> <p>In addition to the circuit shown below, such a link also provides for a connection on bridleways from Swineshead all the way across to the outskirts of St Neots and, with a little road work, to the National Cycle Network route 12 towards Grafham. Such long-distance routes may help build equestrian tourism in the area.</p>	N	The Applicant has explored the potential to provide the bridleway connection. However, agreement has not been secured and therefore this route cannot be delivered, but the Applicant will continue to negotiate and will provide if possible..

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			It is appreciated that the developer will need the agreement of the landowner and that this may not be easily forthcoming. However, the BHS would argue that the (non-financial) cost to the landowner is insignificant compared to the benefit he will obtain from the development. There are significant benefits to local equestrians and the fact that such a route has been made available on a permissive basis in the past would indicate that equestrian use has not previously created significant problems.		
		Public Rights of Way, green corridors	<p>As a matter of principle, the BHS believes that all the footpaths within the scheme should be available as equestrian routes. This is a position supported by both Bedford Borough rights of way team and by the Borough's Local Access Forum. Indeed, both these bodies would prefer to see dedicated upgrades but accept that this may well not be within the gift of the developer.</p> <p>The 20m wide green corridors will provide plenty of room for equestrian usage of the routes without any adverse impact on pedestrians. Indeed, it is our experience that most walkers are delighted to encounter horses when out walking and conflict between user groups is rare.</p> <p>The Countryside Agency has published two research notes that are relevant to this issue, albeit some years ago. CRN 32, March 2001 "How people interact on off-road routes" and CRN 69, June 2003 – "How people interact on</p>	N	<p>The Scheme has been designed to maintain all existing PRoW and, where necessary, provide appropriate diversions during construction to ensure continued connectivity for users. However, the Scheme does not include permanent upgrades of PRoW to bridleways. The Applicant is nevertheless committed to ensuring that existing PRoW remain safe, accessible, and appropriately managed during both construction and operation.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme. It details that the diversions</p>

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			<p>off-road routes: Phase II". CRN 32 concludes is that the research "finds conflict is very infrequent, is generally slight and is mainly concerned with intrusion". In this context intrusion is defined as "crowding, delay, gesturing, speeding". CRN 69 states that "for a shared use route to function without actual conflict occurring, the minimum width needs to be 2m". Both documents note that the discussion of conflict serves to escalate its perceived existence.</p> <p>Again, the work involved in making these routes suitable for equestrians should not be major and will largely involve the widening of gaps in hedges/by gates.</p> <p>Where footpaths within the site do not connect some additional permissive bridleways would be required to link them up - on the southern end of Array 7 and Array 8 (the latter already offered as permissive footpaths). If the next proposal is not delivered there would also need to be some linking permissive bridleways in Site A (indicated with a * below).</p> <p>The Society accepts that such routes can only be secured on a permissive basis. A binding agreement to allow access for the whole of the life of the development – that is until the decommissioning commences would be required. I specify until decommissioning starts so that the permission lasts until the land returns to agricultural use.</p>		<p>and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction.</p> <p>The proposed maintenance and enhancement of public rights of way is set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>

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		Public Rights of Way network, byways	<p>I propose a further improvement of the PRoW network in the site by the provision of a permissive restricted byway around Site A.</p> <p>The BHS would make the case that this additional route should have restricted byway status so that it is available to all non-motorised PRoW users. Carriage driving is an increasingly popular form of equestrianism in that it is available to those of limited mobility, whether as a result of age, injury or disability. At present local carriage drivers are largely restricted to the roads as off-road byways are rare in the Borough with only 35km of byways (out of over 950km of PRoW) and only 1km of that being restricted byway.</p> <p>Initially I had planned to propose a restricted byway around the whole of the two Bedfordshire sites. However, on further examination of the illustrative masterplan, I consider a route around Site A to be deliverable without major changes to the layout as most of the route is already a public right of way whereas parts of Site B are more problematic.</p> <p>The additional sections of permissive PRoW required to make a perimeter route are:</p> <ul style="list-style-type: none"> • around the open fields on either side of BW40 • around the western and northern sides of Array 11 (if it is retained) – the footpath to the northern side appears not to be within the development 	N	<p>The Applicant has explored the potential to provide the bridleway connection. However, agreement has not been secured and therefore this route cannot be delivered, but the Applicant will continue to negotiate and will provide if possible. The Scheme has been designed to maintain all existing PRoW and, where necessary, provide appropriate diversions during construction to ensure continued connectivity for users. However, the Scheme does not include permanent upgrades of PRoW to bridleways. The Applicant is nevertheless committed to ensuring that existing PRoW remain safe, accessible, and appropriately managed during both construction and operation.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme. It details that the diversions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction.</p> <p>The proposed maintenance and enhancement of public rights of way is set out in the outline</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> • a small section on the western end of Array 12 to connect B&K BW40 to B&K FP34* • Then from around more of Array 12 to connect B&K FP32 to Pertenhall FP 2 <p>In the northeastern corner, I have suggested using FP2 on the basis that it is more open but FP29 may be a more appropriate route in view of the sharp corner near Chadwell End.</p> <p>I have not included Array 10 on account of its size and Array 13 on the basis that the route along the stream (FP2) will be more attractive.</p>		Landscape and Ecological Management Plan [EN010141/DR/7.7].
		Equestrian access	As the proposals currently stand the Society strongly objects to the development on the grounds that equestrian access is not safeguarded during construction and that no attempt has been made to improve equestrian access despite both national and local policy to do so.		The Applicant notes these comments.

Table 1.4: British Horse Society Cambridgeshire

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	National Planning Policy, byways, Public Rights of Way	NPPF 104 requires development to improve and enhance the rights of way network. There are clear opportunities for this to happen within this project. Sufficient dimensions proposed as buffers would provide ample space for additional shared use peripheral routes (restricted byways) around the sites to link with the existing PRoW network for the lifetime of the project along with upgrades of the footpaths to increase access off-road for cyclists and all equestrians, enabling the rights of way network to be used by more people, is within the gift of this development. This applies particularly to the lack of Cambridgeshire higher status routes southwest of Gt. Staughton.		<p>The Applicant has explored the potential to provide the bridleway connection. However, agreement has not been secured and therefore this route cannot be delivered, but the Applicant will continue to negotiate and will provide if possible. The Scheme has been designed to maintain all existing PRoW and, where necessary, provide appropriate diversions during construction to ensure continued connectivity for users. However, the Scheme does not include permanent upgrades of PRoW to bridleways. The Applicant is nevertheless committed to ensuring that existing PRoW remain safe, accessible, and appropriately managed during both construction and operation.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p> <p>The proposed maintenance and enhancement of public rights of way is set</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7]
		Public Rights of Way	<p>Cambridgeshire Rights of Way Improvement Plan policies which apply to this project are:</p> <p>SOA 2 A safer and health-enhancing activity</p> <p>In the past, there have been specific instances of footpaths upgraded to bridleways to provide horse riders with safer off-road routes. Examples of schemes that have improved safety for a range of users include:</p> <ul style="list-style-type: none"> • Long Road, Comberton; • Jack's Way, paid for from Northstowe monies • Fordham bypass – bridleway within bypass, • Cambridgeshire Guided Busway bridleway and cycleway <p>Guiding Principles 2, 3 and 5</p> <p>Cambridgeshire County Council requires that a Change of Surface Application Form is submitted where the project impacts on a public right of way. This form needs to be submitted and approved prior to any planning application.</p> <p>I note that the development proposes to cross / run alongside / for the bridleway to be used as a haul road along, Bridleway 112/27 Hail Weston.</p>		The Applicant notes this comment.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Site access, bridleways, construction, cable route	<p>Bridleways, byways and unsurfaced roads should not be used for site access. If it is unavoidable, every effort should be made to ensure that the surface will be maintained and restored to a surface material suitable for horses after construction of the solar farm. An alternative route for equestrians should be provided during construction to minimise disruption and to ensure users' safety, which includes not forcing them to use roads as the only alternative.</p> <p>Damage to a good natural resilient surface is commonly a negative impact of a development because it may not be possible to reinstate the surface, and yet another grass track is lost. This can be avoided by careful planning and using horizontal directional drilling to minimise damage rather than direct burial, which increases damage, even though the cost may be higher for drilling. Damage from vehicles engaged in the cable-laying can also be minimised by using temporary protective tracks on which the vehicles run, but which are removed to leave minimal impact on the surface</p>		The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] as part of the application which sets out how public rights of way will be managed across the construction phase to protect users.
		Cable route, Public Rights of Way, bridleways, equestrian users,	If any of the cabling routes cross or run along the public rights of way, the cable routing and its impact on bridleways and byways is often missed and the damage to surfaces can be very disadvantageous to equestrians, especially		The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		construction vehicles	<p>where not reinstated or where replaced by a sealed surface.</p> <p>I will object to any proposal to create a surface unsuitable for equestrians and where vehicles are likely to compromise the amenity and safety of riders and their horses.</p>		<p>way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme. It details that the diversions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction.</p> <p>The proposed maintenance and enhancement of public rights of way is set out in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>
		Public Rights of Way	<p>There is no acknowledgement in your documentation regarding the two DMMO's (Definitive Map Modification Orders) which will be impacted by the project.</p> <p>The two routes are DMMO M206 LH and M207 LH. These applications should be determined during the lifetime of this solar farm installation and could even have been determined before commencement of works.</p>		<p>The Applicant is aware of one DMMO application that intersects the Site (Case Number M206 - LH) to create a bridleway. The Applicant would not object to the creation of a public right of way along this route, or to potential future permissive path provision in this location.</p>
		Impact on communities, wildlife, footpaths, access to	<p>Solar farms are industrial entities which bring no benefit to local residents but on the contrary, impact very negatively on the immediate area around their homes and communities. Provision of a network of rural rights of way for the</p>		<p>The Applicant disagrees with the assertion that the Scheme would bring no benefit to local residents.</p> <p>At the 2024 statutory consultation, the Applicant set out three potential models for</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		countryside, biodiversity, health and wellbeing	<p>duration of the solar farm is one way which could benefit local residents and lessen the negative impact of the project. Natural grass paths are wildlife corridors which could benefit from East Park's management of the land outside the actual panels, upgrade of footpaths to ideally, restricted byways to enable the many mobility challenged horse owners to access the countryside, would enable the existing soft surface network to work a little harder and provide benefit to more people.</p> <p>Provision of rural rights of way would improve biodiversity, enable health and wellbeing benefits to humans and it would provide site security because locals will know exactly who should be there and those people engaging in anti-social behaviour are often very wary of someone on a horse whereas someone on foot would be of less concern.</p> <p>There are many users of soft surface rights of way – walkers, dog walkers, runners, off road cyclists, as well as horse riders. This project could make a significant contribution to the rights of way network for the next 40 years.</p>		<p>how community benefit could be delivered as part of the Scheme, to ensure that those living in the area around the Scheme benefit from its construction and operation.</p> <p>Following the consultation, the Applicant subsequently announced its intention to deliver community benefit funding in excess of any of the options consulted on previously. Additionally, residents will benefit from the long-term benefits that will arise as part of the Scheme, including increased energy security as a result of reduced reliance on imported oil and gas from overseas.</p> <p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme. It details that the diversions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction.</p> <p>The proposed maintenance and enhancement of public rights of way is set out in the outline Landscape and</p>

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					<p>Ecological Management Plan [EN010141/DR/7.7].</p> <p>As part of our mitigation measures, the Applicant is also proposing the provision of permissive footpaths west of Little Staughton to increase access to the local public rights of way network and create the opportunity for new circular routes.</p>
		Economic impact	<p>I would like to reiterate that there is a commercial and financial benefit of the equestrian industry in Cambridgeshire. The industry (excluding the racing industry) contributes over £155 million pa to the Cambs rural economy. Nationally, the industry is the second largest rural employer – second only to agriculture. The horse racing industry which is worth over £4bn annually, relies on large numbers of work riders. The equestrian industry provides grass roots training for the large numbers of staff required in the racing industry and many of the associated industries such as vets, farriers, feed merchants, hay merchants, trainers, event venues etc. Provision of livery yards and other equestrian facilities is an important commercial diversification opportunity for farmers and landowners. None of these commercial enterprises can exist without riders and carriage drivers having access to safe, off road, rural rights of way where they can learn and practice their riding and driving skills. And, of course, equestrian competition is one of the</p>		<p>The Applicant notes these comments.</p>

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			very few sports where men and women compete successfully on an equal basis for the same prizes.		

Table 1.5: Buckden Parish Council

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Location, use of agricultural land	It was resolved to object to the application because according to our Solar Policy solar panels should not be installed on greenfield sites and the Parish Council would strongly oppose any application for them on agricultural land of Grade 3 or better.	N	<p>In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land. However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own.</p> <p>As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		BESS, Storage capacity	We are also concerned regarding the small amount of storage capacity.	N	The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of up to 100 MW / 200 MWh of electricity in the BESS. This means that the BESS is capable of exporting at full capacity for 2 hours. Storage durations beyond 2 hours are currently unviable due to current electricity market arrangements. The footprint also increases substantially with increased duration leading to greater environmental impacts.

Table 1.6: CPRE Bedfordshire

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Location, alternatives, use of agricultural land	<p>We wish to ensure that wherever possible Solar PV generating systems are located in the most appropriate locations, ensuring that environmental damage is kept to a minimum.</p> <p>For this reason, we will support large scale Solar PV schemes when they are situated on brownfield (previously used) land or on the poorest quality agricultural land with Agricultural Land Classification (ALC) of 3b, 4 and 5, provided that they are not in Areas of Outstanding Natural Beauty or in National Parks and do not have an unduly adverse impact on the surrounding landscape.</p> <p>We also support and encourage large scale solar installations on the roofs of industrial and commercial buildings e.g. offices, factories, retail complexes and warehouses.</p>	N	<p>In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land. However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own. This is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2].</p> <p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
		Planning policy	<p>In para 9.32 Bedford Borough Council's Local Plan 2030 refers to government guidance on large scale solar development as follows; <i>“proposals should make effective use of previously developed land and, where a proposal requires the use of agricultural land, poorer quality land should be used in preference to land of a higher quality.”</i> This methodology therefore identifies the location of the best and most versatile (BMV) agricultural land, where it is known, as an area which is not suitable.’</p> <p>Local Plan Policy 56 – Renewable energy - broad locations suitable for renewable energy development states that planning permission will be granted for large-scale (>100kW) wind and solar energy development where proposals are within the broad locations shown on Figures 12 and 13, and where proposals satisfy the requirements of Policy 57 on general impact, together with any other relevant planning considerations.</p>	N	<p>In line with National Policy Statement EN-3, the Applicant has considered the potential for the Scheme to be located on previous developed land, brownfield land, contaminated land and industrial land prior to looking at agricultural land. However, the Applicant's assessment determined that there was not sufficient brownfield or previously developed land suitable for supporting the Scheme on its own. This is set out in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2].</p> <p>The Applicant has appraised relevant local plan policies within the Policy Compliance Document [EN010141/DR/5.4].</p>
		Cumulative impact, planning policy	<p>Policy 57 states that proposals for development involving the provision of renewable and/or low carbon energy generation, including community energy projects, will be supported, subject to the acceptability of their wider impacts. As part of such proposals, it shall be demonstrated that all of the following potential impacts (including</p>		<p>The Applicant can confirm that all of the topics listed were considered as part of the PEIR consulted on at the 2024 statutory consultation and are covered in Environmental Statement [EN010141/DR/6.1 / 6.2 / 6.3] submitted as part of the DCO application.</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<p>cumulative impacts) have been fully addressed in consultation with affected local communities.</p> <p>General impacts:</p> <ul style="list-style-type: none"> Context, visual appearance and landscape character. Natural features, the natural environment, geology and biodiversity (including Natura 2000 sites). Cultural features, historical and archaeological features, heritage assets and their settings. Local land use, social and economic impacts. Surface and ground water. Traffic and access. 		The Applicant has appraised relevant local plan policies within the Policy Compliance Document [EN010141/DR/5.4] .
		Landscape and communities, agricultural land, food security, alternatives	<p>It is clear that this proposed development does not meet the conditions and general criteria set out in these policies to determine whether or not a scheme of this kind is acceptable. The following reasons apply;</p> <ul style="list-style-type: none"> Negative impact on landscape and rural communities, including construction impacts Loss of BMV agricultural land and food security 		The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. The Preliminary Environmental Information Report (PEIR) published at the statutory consultation clearly sets out the potential impacts of the Scheme during construction, operation and decommissioning and, where possible has set out a range of measures to prevent, reduce or offset any adverse impacts in ES Vol 1: Main Report [EN010141/DR/6.1] included in the development consent order application.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			<ul style="list-style-type: none"> There are better alternatives for generating solar energy than constructing massive installations in the countryside as evidenced by CPREs rooftop solar campaign. 		<p><u>Construction traffic</u></p> <p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>As a result of the measures outlined above and in the development consent order application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p><u>Visual impact</u></p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>Overall, ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] concludes that despite the extent of the Scheme, significant landscape and visual effects would be relatively limited in number and largely confined to receptors in close proximity to the Site. Proposed mitigation would integrate the Scheme into the existing landscape and visual setting by year 10 of operation, with no residual significant effects on landscape character identified. Residually significant visual effects that have been identified at Year 10 predominantly associated with public rights of way in closest proximity to the Scheme, but including some more elevated views within 1km of the Site.</p> <p><u>Loss of BMV agricultural land and food security</u></p> <p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK's food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK's food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government's Food Security Report 2021, which stated that climate change and other environmental pressures like soil degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's domestic food production. This report also</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>found that climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Scheme, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change.</p> <p>To meet the UK's net zero targets, it is estimated that around 90 GW of solar will be required by 2050 – this is above and beyond the Government's current solar targets. Using Solar Energy UK's estimate of six acres of land required per megawatt of solar power generated, meeting this target in full would require the use of 218,530 hectares of land, which is less than 1% of the UK's total land area. However, this figure does not take into account how the Government estimates that future solar developments will require less land per megawatt (MW) generated (the Scheme would require around three acres of land per MW). If, for example, all future developments required four acres per MW, then this would reduce the total amount of UK land required to around 0.6%.</p> <p>As of 2022, around 63.1% of land in England is in agricultural use. This amounts to 8,225,085 hectares of land. Not all solar development will take place in England, nor will it all take place on agricultural land. However, if this were to happen then this</p>

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					would affect less than 3% of agricultural land in England. Further information on this topic can be found in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] .
		Consultation materials	The maps provided by East Park Energy as part of the Consultation Brochure are far too small in scale making it very difficult for local people to easily identify their own location and therefore the impact the proposed development will have on their locality.	N	In addition to the plans included in the Consultation Brochure, Newsletter and Feedback, as part of the 2024 statutory consultation the Applicant also published a series of detailed plans in Figures 2.1 to 2.7 of the PEIR. These plans were available to download from the project website and available to view at the in-person consultation events, with paper copies of the plans available via post on request.
		Scale, impact on villages, character and heritage	This is a massive scheme covering a vast area of quiet countryside and rural villages. The impact of the scheme would be to completely transform the area from its historic and current largely agricultural character to an industrial complex across a 6-mile corridor covering 1,900 acres. The proposed development will contain a massive 700,000 panels and will be the size of 1,000 football pitches.	N	The Applicant has considered the landscape character of the site and its relationship with nearby communities, roads and public rights of way, to identify the likely effects on the local landscape and visual amenity. ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] provides details on the assessment and proposed mitigations.
		Impact on communities	The impact on local communities across the area will be immense. Small villages like Little Staughton, Keysoe and Pertenhall will be	N	The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
			almost encircled by fields of 1,000's of solar panels, completely transforming the sense of place in this rural area currently open countryside.		consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] . Overall, ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] concludes that despite the extent of the Scheme, significant landscape and visual effects would be relatively limited in number and largely confined to receptors in close proximity to the Site. Proposed mitigation would integrate the Scheme into the existing landscape and visual setting by year 10 of operation, with no residual significant effects on landscape character identified. Residually significant visual effects that have been identified at Year 10 predominantly associated with public rights of way in closest proximity to the Scheme, but including some more elevated views within 1km of the Site.
		Public Rights of Way	Public Footpaths through the proposed farm will become hedge lined "alleyways" through fields of Solar Panels.		The Applicant is proposing to set back fence lines from field boundaries and public rights of way in areas of high ground, such as west of Little Staughton and at the southern end of Site C, to avoid the solar array breaking skylines, and to allow views out looking 'over' the solar arrays to retain panoramic vistas where possible. The Applicant is also proposing to retain all existing woodland, hedgerows, individual trees, ditches and watercourses as far as practicable.

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>The impact on public rights of way has been considered as part of the design development. The application is supported by an outline Public Rights of Way Management Plan [EN010141/DR/7.8] which set out details on how public rights of way and cycle routes will be managed to ensure user safety during the construction, operation and decommissioning of the Scheme.</p> <p>The landscape mitigation is secured by the illustrative landscape proposals at Appendix A of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The management and maintenance of the Scheme's proposed landscaping and green infrastructure is secured by the requirements of the oLEMP [EN010141/DR/7.7]. This ensures the proposed landscaping is successful in establishing and can be relied on as embedded mitigation for the Landscape and Visual impact Assessment.</p>
		Landscape and character, screening	The suggestion by the developer that it could be constructed in a way that protects landscape character through careful siting and screening completely lacks credibility.	N	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2],</p>

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
					<p>and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating ‘Green Lanes’: public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland,

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					<p>meadows, and hedgerows to benefit ecosystems and reduce visual impact;</p> <ul style="list-style-type: none"> • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features.
		Loss of agricultural land, food security	<p>At a time of Climate Change, it is vitally important that the BMV agricultural land is protected from development, since every square metre – every hectare, will be required to grow food for our population as Climate Change bites and weather systems become even more unpredictable, as we have seen in recent years.</p> <p>75% of the land identified for the proposed East Park Solar development is classified as Best and Most Versatile (BMV) agricultural land grade 2. It is therefore outside</p>		<p>The development of solar infrastructure will help to address climate change, which has been identified as the single biggest threat to the UK's food security. The UK Food Security Index - published by the Government earlier in 2024 - concludes that the UK's food security is 'broadly stable', but that there is a longer-term risk from climate change. This is reinforced by the Government's Food Security Report 2021, which stated that climate change and other environmental pressures like soil degradation, water quality and biodiversity, are the biggest medium to long term risks to the UK's</p>

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			government policy and the policies of Local Plan 2030. It should be refused on these grounds alone.		<p>domestic food production. This report also found that climate change could reduce the proportion of best and most versatile agricultural land by 70% between now and 2050, making it a much bigger risk to the UK's food security than projects like the Scheme, which will help the UK meet its net zero targets and therefore avoid the worst impacts of climate change. Further information on this topic can be found in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1].</p> <p>As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p>
		Alternative locations, brownfield sites	A major CPRE report has found that over half the solar panels needed to hit national net zero targets could be fitted on rooftops and in car parks.		Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar

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			<p>The research, by the UCL Energy Institute, for CPRE, shows that decarbonising the national energy grid requires far less land than feared. Installing solar panels on existing buildings and car parks would enjoy near-universal public support and help minimise objections to large solar farms in the countryside, the research finds. It also reveals that the potential of brownfield sites to generate renewable energy is dramatically underused.</p> <p>The report's publication marks the launch of CPRE's new campaign for rooftop renewables and a petition calling on the government to ensure all suitable new buildings have rooftop solar. We're calling on the government to set a national rooftop solar target of at least 40GW by 2035.</p> <p>The government has set a national target of 70GW of solar energy generation by 2035. CPRE's report analysed the solar capacity of rooftops and covered car parks across England, providing an assessment of the total energy that could be generated.</p> <p>The key findings are:</p> <ul style="list-style-type: none"> • Installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW in England by 2035. • In 2050, with further investment, there is potential to generate 117GW of low 		<p>installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.</p>

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			<p>carbon electricity from roofs and other developed spaces.</p> <ul style="list-style-type: none"> As well as calling on the government to ensure all suitable new buildings have rooftop solar as standard, we want to see regulations updated so that solar capacity is a requirement of planning permission for major refurbishments and new residential, commercial and industrial buildings. 		

Table 1.7: Richard Fuller MP

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Loss of agricultural land, food security	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.	N	As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2] , the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as ‘best and most versatile’, where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant’s agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.
		Scale, decommissioning, manufacturing of solar panels, community compensation, alternative locations	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.	N	<u>Decommissioning</u> The Applicant’s approach to decommissioning includes returning the land that forms the Scheme to a condition suitable for return to its original use after decommissioning, with the exception of areas of planting (woodland and hedgerows) that would be retained post-decommissioning. The requirement of a decommissioning bond or some other assurance may arise during the planning process, although at this time the Applicant considers the legal requirements within the draft DCO [EN010141/DR/3.1] to be

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					<p>sufficient. Additionally, the Applicant does have private securities in place with the landowners of the Scheme relating to decommissioning.</p> <p><u>Environmental impacts</u></p> <p>The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. The Preliminary Environmental Information Report (PEIR) published at the statutory consultation clearly sets out the potential impacts of the Scheme during construction, operation and decommissioning and, where possible has set out a range of measures to prevent, reduce or offset any adverse impacts in the</p> <p>Environmental Statement [EN010141/DR/6.1 / 6.2 / 6.3] included in the development consent order application.</p> <p><u>Construction impacts</u></p> <p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>As a result of the measures outlined above and in the development consent order</p>

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					<p>application ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the DCO application.</p> <p><u>Sourcing of solar panels</u></p> <p>Whilst the Applicant is unable to confirm where the solar panels for the Scheme would be sourced from, as part of its environmental assessments it has assumed that they would be sourced from China. ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [EN010141/DR/6.2] assumes that the panels will be manufactured and transported from China.</p> <p>The Applicant is a signatory to Solar Energy UK's industry supply chain statement, which states that "We, members of the UK solar energy industry, condemn and oppose any abuse of human rights, including forced labour, anywhere in the global supply chain.</p>

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					<p>We support applying the highest possible levels of transparency and sustainability throughout the value chain, and commit to the development of an industry-led traceability protocol to help to ensure our supply chain is free of human rights abuses.”</p> <p>The Applicant is also encouraged by ongoing industry developments around standards of conduct in the solar supply chain. As one example, the Solar Stewardship Initiative is currently consulting on a draft Supply Chain Traceability Standard to develop further confidence in how, where, and by whom solar products are manufactured.</p> <p><u>Compensation</u></p> <p>The Planning Act 2008 provides a clear framework for the assessment of nationally significant infrastructure projects, including established provisions for compensation where land or property interests are directly acquired or where statutory blight or injurious affection can be demonstrated.</p> <p>In this case, the Scheme does not require the compulsory purchase of residential properties, and compensation is therefore not applicable in the manner suggested. The Applicant is committed to minimising potential effects on neighbouring residents through the design of the Scheme and through the implementation of mitigation measures secured by the outline Construction Environmental Management</p>

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					<p>Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5].</p> <p>The Applicant has prepared ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2] which sets out there are no properties where the residential visual amenity threshold would be exceeded. The Applicant is not intending to provide direct compensation to local residents.</p> <p><u>Alternatives considered</u></p> <p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.</p>
		Loss of agricultural land, food security,	The key concern about this proposal is the proportion of land it will take up that is		As set out in ES Vol 2 Appendix 3-1 Site Identification Report [EN010141/DR/6.2] , the Applicant has sought to avoid the use of high-quality agricultural land, including that which is

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			<p>graded as Best and Most Versatile land (BMV).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The loss of arable land also has social implications, affecting other individuals and businesses who rely on a strong local farming sector.</p>		<p>classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p>

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		Size and scale, visual impact, impact on countryside, Public Rights of Way	<p>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.</p> <p>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.</p> <p>The height of the solar panels and the installation of fencing and other security measures will further adversely impact the visual landscape.</p> <p>The proposal will affect long-standing public footpaths and rights of way creating disruptions to the landscape.</p>	N	<p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches, and watercourses will be kept where possible; • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and

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					<p>woodland for screening, integration, and wildlife movement;</p> <ul style="list-style-type: none"> • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features.
		Decommissioning, return of land to original state,	There is a lack of clarity regarding the financial arrangements for the eventual decommissioning of the solar farm.	N	The Applicant's approach to decommissioning includes returning the land that forms the Scheme to a condition suitable for return to its original use after decommissioning, with the

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		environmental impact,	<p>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.</p> <p>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.</p> <p>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.</p> <p>The brochure does not however provide any details or plans to explain how this will happen.</p> <p>On Page 30 the brochure simply states, <i>"The site will be returned to a condition suitable for return to its original use after decommissioning"</i>.</p> <p>What specific plans does Brockwell Energy have to ensure grade 2 and grade 3a land</p>		<p>exception of areas of planting (woodland and hedgerows) that would be retained post-decommissioning. Details of the decommissioning are included in the outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p> <p>The requirement of a decommissioning bond or some other assurance may arise during the planning process, although at this time the Applicant considers the legal requirements within the draft DCO [EN010141/DR/3.1] to be sufficient. Additionally, the Applicant does have securities in place with the landowners of the Scheme giving assurance to fund decommissioning.</p>

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			will be reverted to its existing agricultural condition?		
		Disruption, construction, site access, traffic, impact on local roads, mitigation	<p>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.</p> <p>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.</p> <p>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.</p> <p>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:</p>		<p><u>Construction traffic</u></p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the DCO application.</p> <p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>All heavy goods vehicle (HGV) traffic and the majority of daily staff movements would arrive to work via the main access from the B645 into Site D. Once vehicles arrive in Site D, a temporary access road will connect westward across fields to Site C, avoiding the use of Moor Road.</p> <p>From Site C to Site B, access will be via an existing access to Great Staughton Road, avoiding large volumes of traffic from passing through Great Staughton. From Site B to Site A, vehicles would travel along the public highway from the B660 for a short section</p>

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			<p>1. What measures are planned to minimise disruption on the B645 and surrounding areas?</p> <p>2. How will noise, dust, and fumes be managed to reduce impact on local communities?</p> <p>3. Are there plans for alternative access routes to mitigate the load on the smaller roads?</p>		<p>before accessing Site A using an existing access at Manor Farm.</p> <p>As a result of the measures outlined above and in the development consent order application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p><u>Noise and dust</u></p> <p>The outline Construction Environmental Management Plan [EN010141/DR/7.3] sets out measures to mitigate noise impacts during construction.</p> <p>The Applicant has undertaken a noise and vibration assessment, based on detailed measurements of current background noise levels across the project area.</p> <p>This assessment identified noise sensitive receptors (such as people's homes), and the Applicant has modelled the noise impact of the proposals on these receptors based on worst-case scenarios.</p>

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					Based on modelling, the Applicant will put in place noise limits at locations in close proximity to people's homes, to ensure that no significant effects would occur as a consequence of the proposals. Where appropriate, the Applicant will employ measures such as screening to mitigate any noisy works. Additionally, the Applicant is not proposing to undertake any construction works on Sundays or bank holidays.
		Manufacturing, supply chain	<p>The supply chain for the solar panels required for this project touches on significant ethical concerns.</p> <p>There is evidence of the use of forced labour within the supply and manufacturing process for solar panels. 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.</p> <p>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</p>	N	<p>Whilst the Applicant is unable to confirm where the solar panels for the Scheme would be sourced from, as part of its environmental assessments it has assumed that they would be sourced from China. ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [EN010141/DR/6.2] assumes that the panels will be manufactured and transported from China.</p> <p>The Applicant is a signatory to Solar Energy UK's industry supply chain statement, which states that "We, members of the UK solar energy industry, condemn and oppose any abuse of human rights, including forced labour, anywhere in the global supply chain. We support applying the highest possible levels of transparency and sustainability throughout the value chain, and commit to the development of an industry-led traceability</p>

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			and produced throughout the whole of the supply chain		<p>protocol to help to ensure our supply chain is free of human rights abuses.”</p> <p>The Applicant is also encouraged by ongoing industry developments around standards of conduct in the solar supply chain. As one example, the Solar Stewardship Initiative is currently consulting on a draft Supply Chain Traceability Standard to develop further confidence in how, where, and by whom solar products are manufactured.</p>
		Compensation, community benefits	<p>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.</p> <p>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.</p> <p>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</p>		<p>The Planning Act 2008 provides a clear framework for the assessment of nationally significant infrastructure projects, including established provisions for compensation where land or property interests are directly acquired or where statutory blight or injurious affection can be demonstrated.</p> <p>In this case, the Scheme does not require the compulsory purchase of residential properties, and compensation is therefore not applicable in the manner suggested. The Applicant is committed to minimising potential effects on neighbouring residents through the design of the Scheme and through the implementation of mitigation measures secured by the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Operational Environmental Management Plan [EN010141/DR/7.5].</p>

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			<p>not provide confidence that this is appreciated by Brockwell Energy.</p> <p>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.</p>		<p>The Applicant has prepared ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2] which sets out there are no properties where the residential visual amenity threshold would be exceeded. The Applicant is not intending to provide direct compensation to local residents.</p>
		Alternative locations	<p>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:</p> <ul style="list-style-type: none"> • 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. 		<p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.</p>

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

Table 1.8: Stop East Park Energy

Date Consulted	Response Deadline	Consultation Topic	Matters raised in response to 2024 statutory consultation	Change Y/N?	Regard had to response
24 September 2024	29 October 2024	Size and scale	Your scheme is literally overwhelming. It's bigger than Gatwick Airport and seven times the size of the UK's largest operational solar site. It spans over six miles end to end, covers 1,900 acres, and includes 700,000 photovoltaic panels and more than 40 miles of security fencing. Vast tracts of farmland would vanish under glass.		<p>The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p>
		Loss of agricultural land, alternative locations, brownfield sites, food security	An over-scaled solar site targeting good agricultural land does not belong here – or on any farmland. There are better places, from warehouse roofs through car parks to transport corridors. Residents have even suggested specific alternative local brownfield sites and industrial and commercial building rooftops. A quick calculation shows that if just two national supermarket chains added solar panels to their roof space, East Park would be redundant.		<p>As set out in ES Vol 2 Appendix 3-2: Land Identification Report [EN010141/DR/6.2], the Applicant has sought to avoid the use of high-quality agricultural land, including that which is classified as 'best and most versatile', where possible when developing its proposals. However, there are various constraints, including the general high quality of farmland in the area, the need to remain within 15km of the Applicant's agreed connection point at Eaton Socon substation, and the</p>

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			<p>Your power plant would take out very high quality, fertile farmland – it's 74 per cent Best and Most Versatile land, grade 2 and grade 3a. It's been successfully farmed for generations and only a matter of weeks ago produced a plentiful harvest of crops including wheat, barley and oats. The nearly 2,000 acres of agricultural land is capable of growing enough wheat to make around 3.6 million loaves a year.</p>		<p>topography/nature of some land within the search area, which mean that the Scheme does still involve building solar infrastructure on some high-quality farmland.</p> <p>Whilst it is outside of the scope of the Scheme, the Applicant agrees that there is a need to build more rooftop-mounted solar, such as on warehouses and other existing buildings. However, rooftop-mounted solar installations account for only a small amount of the UK's total solar generation capacity at present. To meet the Government's ambitions to boost the amount of solar power capacity, there is an established need to bring forward new ground-mounted solar developments at the same time as better utilising rooftops. Proceeding with new rooftop-mounted solar only would not be enough to meet the Government's targets.</p> <p>The development of solar infrastructure will help to address climate change, which is the single biggest threat to the UK's food security. The Department for Environment, Food and Rural Affairs says that climate change could result in the loss of nearly three quarters of the UK's stock of high-grade agricultural land by 2050.</p>
		Proximity to properties,	It is difficult for us to understand why you have designed your scheme so close to people's homes and running right up to and around		The scale and design process for the Scheme is explained in ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2] and

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		impact on local area	villages. It dominates a string of small communities spanning the county border. Instead of living within a rural setting characterised by centuries-old seasonal farming cycles, we would be hemmed in by hundreds of thousands of up to 3 metre high photovoltaic panels, security fencing, lighting, intrusive CCTV, inverters, 3 metre high transformer units, and industrial scale battery energy storage systems.		<p>in the Design Approach Document [EN010141/DR/5.6].</p> <p>The Applicant has carefully considered the visual impact of the proposals through Chapter 5 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. This is accompanied by ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2], ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2], and ES Vol 2 Appendix 5-5: Effects on Visual Receptors [EN010141/DR/6.2].</p> <p>Following the 2024 statutory consultation, the Applicant chose to remove solar development from several locations, reducing the visual impact of the Scheme at these locations, as set out in the Design Approach Document [EN010141/DR/5.6].</p> <p>ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [EN010141/DR/6.3] shows the proposed solar areas, screening and environmental mitigation. The masterplan has been created to guide landscape and environmental design for the project, aiming to reduce its impacts, measures include:</p> <ul style="list-style-type: none"> • Retaining existing natural features: woodland, hedgerows, trees, ditches,

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					<p>and watercourses will be kept where possible;</p> <ul style="list-style-type: none"> • Maintaining public rights of way: all existing paths will remain in their current alignment; • Creating 'Green Lanes': public paths will run through 20-metre-wide corridors with hedgerows and woodland for screening, integration, and wildlife movement; • Sensitive landscaping: especially on higher ground, to keep footpaths open and preserve views, such as across the Kym Valley; • Enhancing waterside meadows: along streams, with new woodland, meadows, and hedgerows to benefit ecosystems and reduce visual impact; • Adding permissive paths: to improve local access and create new circular walking routes; • Setting fences back: from field edges and paths on high ground to avoid blocking panoramic views and skylines; • Planting new hedgerows and trees: for screening, integration, and restoring historic field boundaries; and

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					<ul style="list-style-type: none"> • Creating species-rich grassland: as buffers for ecological benefits and to protect homes and existing landscape features.
		Construction, disruption, noise, tranquillity	<p>Your so-called ‘temporary’ scheme would take three long years to build, and we would have no choice but to endure disruption, dust and endless noise. The pile-driving alone would shatter what you describe as the current “tranquillity” here. There would inevitably be more traffic on our narrow roads, past our schools and in our villages from hundreds of contract workers. We know that your construction access plans would be meaningless in practice. We have seen it before – long lorry queues bottlenecking muddy B and C roads, endless work carried out beyond the stipulated timeframes, and HGV drivers using unauthorised routes to reach busy sites.</p>		<p><u>Construction traffic</u></p> <p>An outline Construction Traffic Management Plan [EN010141/DR/7.4] has been produced as part of the DCO application.</p> <p>The Applicant has sought to reduce the need for construction traffic to utilise the existing local road network where possible as part of the Scheme. To facilitate this, it is proposing to use temporary access roads that would result in the majority of construction traffic bypassing Great Staughton, with no traffic movements associated with the Scheme through Little Staughton, Keysoe and Pertenhall.</p> <p>All heavy goods vehicle (HGV) traffic and the majority of daily staff movements would arrive to work via the main access from the B645 into Site D. Once vehicles arrive in Site D, a temporary access road will connect westward across fields to Site C, avoiding the use of Moor Road.</p> <p>From Site C to Site B, access will be via an existing access to Great Staughton Road, avoiding large volumes of traffic from passing through Great Staughton. From Site B to Site A, vehicles would travel along the public</p>

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					<p>highway from the B660 for a short section before accessing Site A using an existing access at Manor Farm.</p> <p>As a result of the measures outlined above and in the development consent order application, ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] concludes that the anticipated impact of the Scheme with regard to traffic and transport is forecast to be negligible or minor with regard to driver delay, accidents and safety, pedestrian delay, severance, non-motorised user amenity, and fear and intimidation. A neutral impact is forecast with regard to public transport during construction, whilst the residual effects in relation to traffic and transport during the operational phase would be negligible.</p> <p><u>Noise</u></p> <p>The outline Construction Environmental Management Plan [EN010141/DR/7.3] sets out measures to mitigate noise impacts during construction.</p> <p>The Applicant has undertaken a noise and vibration assessment, based on detailed measurements of current background noise levels across the project area.</p> <p>This assessment identified noise sensitive receptors (such as people's homes), and the Applicant has modelled the noise impact of the</p>

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					<p>proposals on these receptors based on worst-case scenarios.</p> <p>Based on modelling, the Applicant will put in place noise limits at locations in close proximity to people's homes, to ensure that no significant effects would occur as a consequence of the proposals. Where appropriate, the Applicant will employ measures such as screening to mitigate any noisy works. Additionally, the Applicant is not proposing to undertake any construction works on Sundays or bank holidays.</p>
		Alternative energies, existing sites	<p>We host plenty of renewable energy right now. We already have solar schemes in place and in the local planning pipeline that would generate 165MW of power. Wind power provides more. Your plan would create a six-mile solar corridor – along with the existing and new sites it would amount to 2,800 acres of solar.</p>		<p>The cumulative impacts of the Scheme alongside other proposed developments in close proximity to the site have been fully assessed across all technical disciplines in ES Vol 1 Chapter 17: Cumulative and In Combination Effects [EN010141/DR/6.1]. The additional developments assessed have been agreed with the relevant authorities to ensure that the correct developments have been identified. The assessment concludes that there would be no significant cumulative residual effects beyond the effects of the Scheme in isolation.</p>
		BESS risk, wildlife, security	<p>You have been challenged on issues as diverse as lithium-ion battery energy storage risks, flooding, illogical landscape interventions, the impact on local wildlife, the shortcomings and</p>		<p>Addressed throughout and in the application in general</p>

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			provenance of your chosen tech, and the potential rise in crime in our area as thieves target valuable equipment		
		Statutory Consultation	<p>Your statutory consultation was just a tick box exercise. You and your representatives did not even try to claim that the consultation process counted. You took no notes of what we said. The fact that you hired a security guard for your sessions tells us everything we need to know about how much faith you have in your own plan and its suitability for this location. Your responses included 'Yes of course the scheme will get the go ahead' and 'What difference does it make if we have to import more food?' When asked if you'd be happy to live next to an enormous power scheme, the answer was a hesitant 'I think so'</p>		<p>The Applicant disagrees with the characterisation of its statutory consultation, through which it sought to meaningfully engage with communities regarding plans for the Scheme in line with the requirements of the Planning Act 2008 as outlined in this Consultation Report.</p> <p>When carrying out the statutory consultation, the Applicant sought to positively respond to comments about how it undertook the non-statutory consultation where possible. For example, it held two additional consultation events, including a full public consultation event in Great Staughton and a series of 1:1 bookable meetings in Pertenhall. The Applicant also rebuilt the project website to improve accessibility to the detailed information provided as part of the statutory consultation.</p> <p>The purpose of the in-person consultation events was to provide an opportunity for those interested to learn more about the proposals and speak to members of the project team. Many such conversations were had, with more than 300 people attending these events in total. However, the Applicant made clear during the consultation that respondents</p>

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					<p>should submit formal feedback via the feedback channels identified in the consultation material to avoid comments being paraphrased or misinterpreted.</p> <p>During each consultation event, the Applicant had members of the project team responsible for logistics (including transporting of equipment and consultation materials), first aid and also security, should this be required. This is a standard feature for consultation on major infrastructure projects and is not to suggest that the Applicant expected any incidents at the consultation events (and indeed, no such incidents occurred).</p>
		Employment, local businesses	Your scheme would bring only a handful of new low skill operational jobs to the area. It would leave local farmworkers redundant. It threatens the livelihoods of thriving small businesses.		<p>The Applicant has carefully considered the employment impacts of the Scheme through Chapter 14 of the PEIR published at the 2024 statutory consultation and ES Vol 1 Chapter 14: Socio Economics, Land Use and Tourism [EN010141/DR/6.1]. This estimates that the site area supports nine existing jobs that would be lost as a result of the Scheme. However, it is expected that there would be 20 gross direct full time employee equivalent roles during the Operational Phase, creating a net gain. Additionally, it is expected that the Gross Value Added from workers would total £26.3 million during the lifetime of the Scheme.</p>

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		Net Zero, scepticism in process, impact on house prices, impact on countryside	<p>This is not about the rush to reach Net Zero. There is no real cradle to grave carbon calculation of the whole scheme. You are not interested in generating electricity in better ways, deploying the limited land available and renewable energy sources more intelligently. This is purely about profit. Your power scheme would generate multimillions of pounds for your institutional capital-backed business. It would make a group of local farmers richer to the tune of several millions every year. But the communities forced to host it would be labelled 'black mirror villages' by the media, suffer the stress of battling a long, complex and expensive planning process that is stacked against us, followed by a punishing three-year construction programme that would devastate our countryside and devalue our homes. Your lucrative scheme is quite literally at our expense.</p>		<p>As part of ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1], the Applicant has undertaken a greenhouse gas assessment that considers the construction, operation and decommissioning phases. This includes an assessment of the embodied carbon required for the Scheme. This assessment concludes that the Scheme will result in a significant net benefit with regards carbon emissions to the atmosphere.</p> <p>Whilst the Applicant is a commercial entity, the Scheme has a range of benefits to the community and the UK as a whole.</p> <p>The Scheme would boost the UK's energy security by connecting up-to 500 megawatts of power to the electricity transmission network. Up-to 400 megawatts of this total – enough energy to power 108,000 homes - would be from new, clean solar generation capacity, whilst the battery storage facility would have a capacity of an additional 100 megawatts.</p> <p>The Applicant will also create a Legacy Fund a total value of £6.4 million across the lifetime of the project for the local community.</p>
		Industrialisation of countryside, impact on community	<p>Hundreds of locals are horrified by your plan to industrialise their environment. We are not NIMBYs – this over-scaled scheme does not need to go in anybody's backyard. We are ordinary people, young and old, from all walks of</p>		<p>The Applicant has considered the landscape character of the site and its relationship with nearby communities, roads and public rights of way, to identify the likely effects on the local landscape and visual amenity. ES Vol 1</p>

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			life, who have chosen to live in a piece of countryside that your scheme would radically change for more than four decades – or for good.		Chapter 5: Landscape and Visual [EN010141/DR/6.1] provides details on the assessment and proposed mitigations.

Table 1.9: The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire

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24 September 2024	29 October 2024	Wildlife, woodland	Kangaroo Meadow and Huntingdon Wood Country Wildlife Sites (CWS) are located adjacent to the Site and three ancient woodland parcels are located within 500m of the Site boundary, including Huntingdon Wood. Pertenhall Brook flows through part of Site A, whilst Site C is bounded by the River Kym to the north. We are also concerned about the impacts of site D on the emerging Huntingdonshire Nature Network.		<p>The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] provides more information.</p> <p>During construction there would be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation during the construction phase.</p> <p>There would similarly be no significant beneficial or adverse effects on habitats during the construction phase due to the protection of trees and woodland across the Site, and that hedgerow removals would be retained and protected with the exception of 54m of hedgerow that is expected to be removed.</p>

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					<p>For protected species, whilst there would be a range of adverse impacts to species identified as using the Site, due to the established mitigation measures the effects on all species would be not significant.</p> <p>During the operational phase there would continue to be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation.</p> <p>There are significant beneficial effects predicted for habitats across the Site due to the establishment of woodlands, hedgerows and grasslands across the Scheme.</p> <p>There would be significant beneficial effects for bird assemblage and foraging and commuting bats due to the extent of habitat creation which should provide substantially increased foraging and commuting opportunities for these species. There would be no significant adverse effects on protected species during the operational phase.</p>
		Local planning policy, Biodiversity Net Gain, environmental impact, watercourses	In their consultation response Bedford Borough Council refer to a recommendation in the Draft Local Plan 2040 to go further than biodiversity net gain (BNG) and adopt an environmental net gain approach in planning and development. We support this recommendation. The consultee response provides a commitment to include BNG,		<p>The Biodiversity Net Gain Report [EN010141/DR/7.17] provides an assessment undertaken utilising Defra's Statutory Biodiversity Metric Calculator ('the Metric') to provide evidence of an achievable on-site gain in biodiversity units. Based on the illustrative design shown on Appendix A Illustrative Landscape Proposals of the outline Landscape and Ecological Management</p>

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			<p>but no reference is made to environmental net gain.</p> <p>In their consultation response Bedford Borough Council refers to Policy 43 of their Local Plan 2030 which requires a 'net increase in biodiversity' and to Policy DM7 of their Draft Local Plan 2040 which requires 'securing a minimum of 10% BNG'. Paragraph 7.7.9 states that 'the Scheme commits to a minimum of 10% net gain in habitat and hedgerow units and no net loss in watercourse units'. No justification is provided as to why watercourse units would be limited to no net loss. The Scheme should commit to a minimum 10% net gain across all three-unit types, particularly given the existence of two watercourses and numerous ditches on the Site; proposals to install twenty new watercourse/ditch crossings; and landscaping proposals along the course of Pertenhall Brook.</p>		<p>Plan (oLEMP) [EN010141/DR/7.7] (which the Scheme must be developed in substantial accordance with) it is anticipated that the Scheme could achieve an overall net gain of approximately 79.51% in area-based habitat units, 36.91% in hedgerow units, and 5.95% in watercourse units.</p> <p>While a 10% gain is not achieved in relation to watercourses, the habitat creation measures as shown on the Illustrative Landscape Proposals and to be secured through the oLEMP [EN010141/DR/7.7] will enhance the bank top habitat of ditches and watercourses throughout the Site, representing a qualitative gain.</p> <p>At the detailed design stage the Applicant will seek to maximise BNG as far as practicable (as per Design Principle 4.1 secured by the Design Parameters and Principles Statement [EN010141/DR/7.1]), and it may be possible to achieve a greater BNG for all habitat types compared to the current assessment of the illustrative design. Nonetheless, as the assessment has been based on an illustrative design, out of caution and to avoid any future compliance issue, the Applicant is electing to claim and commit to a future BNG of:</p> <ul style="list-style-type: none"> • 70% net gain in area-based habitat units; • 30% net gain in hedgerow units; and

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					<ul style="list-style-type: none"> 5% in watercourse units. <p>This is less than assessed for the illustrative design, but allows future flexibility if required at the detailed design. The Applicant will endeavour at that stage to meet or even exceed the higher BNG totals as assessed in the BNG Report [EN010141/DR/7.17], particularly with regard to watercourse units.</p> <p>There is currently no mandatory requirement for NSIPs to deliver a statutory BNG.</p>
		Cumulative impacts	The proposed Cumulative Effects Assessment should fully assess potential cumulative impacts of nearby existing and proposed solar developments, including an assessment of the carrying capacity of remaining local habitats to support displaced species.		<p>The cumulative impacts of the Scheme alongside other proposed developments in close proximity to the site have been fully assessed across all technical disciplines in ES Vol 1 Chapter 17: Cumulative and In Combination Effects [EN010141/DR/6.1]. The additional developments assessed have been agreed with the relevant authorities to ensure that the correct developments have been identified. The assessment concludes that there would be no significant cumulative residual effects beyond the effects of the Scheme in isolation.</p>
		Environmental Masterplan, mitigation	The Illustrative Environmental Masterplan proposes a buffer to the north, west and south of Kangaroo Meadow CWS. No such buffer exists to the east. The plans should therefore be amended to provide a buffer.		<p>The east of the Kangaroo Meadow County Wildlife Site (CWS) is formed by an existing road.</p> <p>The Applicant has assessed impacts and effects on the Kangaroo Meadow CWS as part</p>

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					of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] .
		Wildlife and habitats, woodland, cumulative impacts, environmental mitigation	<p>The Wildlife Trust is also concerned about the impacts of site D on the emerging Huntingdonshire Nature Network. The area south of Hail Weston and crossing over the border towards Bushmead has been identified as an opportunity area for nature recovery due to the presence of several County Wildlife Sites (CWS) either side of the county border including ancient woodlands and marshy grasslands. The southern part of the proposed solar park adjoins another recently approved solar park, as well as one already built. A landscape-wide nature corridor should be maintained along the South Brook (which forms the southern boundary of site D) and connecting Staughton Moor Marshy Fields CWS, past High Wood CWS and Huntingdon Wood CWS, both of which are ancient woodlands and onto the Great Ouse valley. The scheme needs to incorporate wildlife rich habitats along this corridor, which will also require setting back of the solar panels from the brook by a greater distance than currently shown. Finally, the cable route also passes adjacent to one of the ancient woods and will need to be far enough away from the wood to avoid impacts to tree root zones.</p>		<p>The Applicant has carefully considered the potential impact of the Scheme throughout the pre-application phase. ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] provides more information.</p> <p>During construction there would be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation during the construction phase.</p> <p>There would similarly be no significant beneficial or adverse effects on habitats during the construction phase due to the protection of trees and woodland across the Site, and that hedgerow removals would be retained and protected with the exception of 54m of hedgerow that is expected to be removed.</p> <p>For protected species, whilst there would be a range of adverse impacts to species identified as using the Site, due to the established mitigation measures the effects on all species would be not significant.</p> <p>During the operational phase there would continue to be no significant beneficial or adverse effects on statutory or locally designated sites for nature conservation.</p>

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					<p>There are significant beneficial effects predicted for habitats across the Site due to the establishment of woodlands, hedgerows and grasslands across the Scheme.</p> <p>There would be significant beneficial effects for bird assemblage and foraging and commuting bats due to the extent of habitat creation which should provide substantially increased foraging and commuting opportunities for these species. There would be no significant adverse effects on protected species during the operational phase.</p> <p>The Scheme will not directly impact on High Wood CWS. The Scheme has the potential to provide greater habitat connectivity between the woodland and other grassland, hedgerow and woodland habitats.</p> <p>An assessment of impacts on the designated and non-designated sites is provided in ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>ES Vol 2 Appendix 2-2: Arboricultural Assessment [EN010141/DR/6.2] sets out ancient or irreplaceable trees habitat (i.e., ancient woodland, ancient or veteran trees) will not be affected. No irreplaceable habitats are present within the Site.</p>