EAST PARK ENERGY

East Park Energy

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Planning Statement

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EAST PARK ENERGY

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Planning Statement

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APPENDICES

1.0 INTRODUCTION

1.1 Purpose of this Document

1.1.1 This Planning Statement has been prepared on behalf of BSSL Cambsbed 1 Ltd ('the Applicant') in relation to an application for a Development Consent Order (DCO) for the East Park Energy Project ('the Scheme'). The application for development consent will be submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for the Department for Energy Security and Net Zero (hereafter referred to as the 'Secretary of State') pursuant to the Planning Act 2008.

1.1.2 The purpose of this document is to provide detail of the Scheme and the need for it, an overview of the relevant legislative context, and to present the Applicant's detailed assessment of the Scheme against the relevant National Policy Statements (NPSs) and other relevant policy and legislative considerations.

1.1.3 This document comprises an application document as defined by Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

1.1.4 The Scheme is 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), requiring an Environmental Impact Assessment (EIA). An Environmental Impact Assessment (EIA) has been undertaken and is reported by the **Environmental Statement (ES) [EN010141/DR/6.1 / 6.2 / 6.3]**. In undertaking the EIA and preparing the ES, the Applicant has taken account of the EIA Scoping Opinion published on 8th February 2023 and included for reference at **ES Vol 2 Appendix 4-2: EIA Scoping Opinion [EN010141/DR/6.2]**.

1.1.5 Where relevant, this document refers to the ES and other reports and assessments which collectively form the application for development consent.

1.2 Overview of the Scheme

1.2.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site BESS on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

1.2.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

1.2.3 The Scheme is a Nationally Significant Infrastructure Project (NSIP) under Section 14(1)(a) and Section 15(2) of the Planning Act 2008 as an onshore generating station in England with a capacity of more than 50MW. As such, a DCO is required for the Scheme to proceed.

1.2.4 The Scheme is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council (a unitary authority) and Huntingdonshire District Council (a two-tier authority with Cambridgeshire County Council). The **Location Plan [EN010141/DR/2.1]** shows the Order Limits for the Scheme.

1.2.5 Subject to the Scheme securing a DCO in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning.

1.2.6 A more detailed description of the Scheme within Chapter 4.0 of this Planning Statement, and in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

1.3 The Applicant

1.3.1 The Applicant, BSSL Cambsbed 1 Ltd is a wholly owned subsidiary of Brockwell Energy. Brockwell Energy is a leading multi-technology independent power producer, specialising in renewable energy infrastructure. Since 2017, Brockwell Energy has originated and built-out more than £1bn of assets in the UK, and have a pipeline of more than 3.5 GW across onshore wind, solar energy, and battery storage currently in development.

1.4 Structure of this Document

1.4.1 The remainder of the Planning Statement is structured as follows:

- Section 2 provides the Statement of Need for the Scheme in the context of national policy and legislation.
- Section 3 provides a description of the Site and its context, in terms of physical characteristics, policy allocations and environmental designations.
- Section 4 provides a description of the Scheme and where the Applicant is seeking to secure flexibility in design, as well as the construction, operational and decommissioning activities and timescales.
- Section 5 provide an overview of the benefits arising as a result of the Scheme.
- Section 6 provides an overview of the legislative context to the application and the legislative, policy and other considerations relevant to the consideration of the application.
- Section 7 provides an appraisal of the Scheme against the relevant national, local and other material policy considerations.
- Section 8 provides a conclusion to the Planning Statement by considering the planning balance, informed by the analysis of the Scheme against policy and other considerations relevant to the determination of the application, and the compelling need for the Scheme.

2.0 STATEMENT OF NEED

2.1 Introduction

2.1.1 It is established at paragraphs 3.2.6 to 3.2.8 of the Overarching National Policy Statement for Energy (EN-1)[1] that there is a need for the Scheme, that the need is urgent, and that the Secretary of State should give substantial weight to that need:

> *"The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that* ***the government has demonstrated that there is a need*** *for those types of infrastructure* ***which is urgent****, as described for each of them in this Part.* [3.2.6]
>
> *In addition, the Secretary of State has determined that* ***substantial weight should be given to this need*** *when considering applications for development consent under the Planning Act 2008.* [3.2.7]
>
> *The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS."* [3.2.8]

2.1.2 On the basis that the need is firmly established within NPS EN-1, and that in accordance with s104(2)(a) of the Planning Act 2008 the Secretary of State must have regard to the NPS, its provisions on need are not repeated in this Planning Statement.

2.1.3 This section of the Planning Statement instead sets out the national context for the need case which is established by NPS EN-1, considering current statutory requirements and contemporary Government and local strategy and policy that goes beyond NPS EN-1 or NPS EN-3. Accordingly, this Statement of Need is structured under the following themes:

- National Legislative Requirements;
- Progress to Net Zero;

- Achieving British Energy Security;
- Green Economic Growth;
- The need to rapidly increase electricity generation;
- Grid Reform; and
- Summary.

2.1.4 A broad evidence base of published data and information has been considered in drafting this Statement of Need. However, for the purposes of decision-making the following documents are considered to be important and relevant to the Secretary of State in accordance with s104(2)(d) of the Planning Act 2008:

- Climate Change Act 2008 (2050 Target Amendment) Order 2019 (2019)
- Sixth Carbon Budget (2021)[2];
- draft Seventh Carbon Budget (2025)[3];
- Paris Agreement (2015)[4];
- British Energy Security Strategy (2022)[5];
- Powering Up Britain (2023)[6];
- Powering Up Britain: Energy Security Plan (2023)[7];
- Powering Up Britain: Net Zero Growth Plan (2023)[8];
- Climate Change Committee 2025 Progress Report to Parliament (2025)[9];
- Accelerating to Net Zero: responding to the CCC progress report and delivering the Clean Energy Superpower Mission (2024)[10];
- Clean Power 2030 Action Plan (2024)[11]; and
- Clean Power 2030 Action Plan: Connections Reform Annex (2024)[12].

2.1.5 It should be noted that the wider benefits of the Scheme (beyond the need case) are set out separately in Section 5 of this Planning Statement.

2.2 National Legislative Requirements

Climate Change Act 2008 (2050 Target Amendment) Order 2019

2.2.1 The Climate Change Act 2008 initially established a legally binding target for the UK to achieve an 80% reduction in greenhouse gas emissions by 2050 (relative to 1990 levels). However, recognising the climate emergency and the need for greater ambition, in 2019 the UK Government became the first major economy globally to enact legislation committing to eliminate its contribution to global warming entirely by 2050, adopting a net zero emissions target compared to the 1990 baseline.

2.2.2 In June 2019, the Government introduced the Climate Change Act 2008 (2050 Target Amendment) Order 2019, revising the original Act's emissions reduction target from at least 80% to at least 100%. This amendment, commonly referred to as the net zero target, legally binds the UK to completely phase out its greenhouse gas emissions by 2050 relative to 1990 levels.

2.2.3 By the time this landmark legislation was enacted, the UK had already achieved a 42% reduction in emissions since 1990 while simultaneously growing its economy by around 72%. However, reaching the net zero target requires transformational further progress – including a massive increase in renewable energy capacity, development of carbon capture and storage technologies, expansion of nuclear energy generation, and transitioning heating and transport systems to electric alternatives.

2.2.4 In April 2021, in line with recommendations from the Climate Change Committee's Sixth Carbon Budget[2], the Government announced an additional ambitious interim target of cutting national emissions by 78% by 2035 (compared to 1990 levels).

2.2.5 Together, the legally binding net zero 2050 commitment and the 78% by 2035 milestone, make clear that a massive expansion of renewable energy projects will be essential across the UK to achieve our climate objectives.

Carbon Budgets and the Seventh Carbon Budget

2.2.6 The Climate Change Act 2008 established a system of five-year carbon budgets that cap the total UK emissions in each budget period. These carbon budgets, set 12 years in advance, serve as interim milestones on the path to net zero and are legally enforceable limits under the Act.

2.2.7 The Fourth Carbon Budget (2023–2027) was legislated by the Carbon Budget Order 2011, requiring a 50% reduction below 1990 levels by 2027. The Fifth and Sixth Carbon Budgets (covering 2028–2032 and 2033–2037, respectively) were adopted in 2016 and 2021. The Sixth Budget was the first one calibrated to the revised net zero 2050 target.

2.2.8 The Sixth Carbon Budget mandates the most ambitious emissions cut yet: the 78% reduction by 2035 target (relative to 1990), and effectively requires the UK power sector to reach zero carbon by 2035. Achieving this will demand a dramatic step-change in the energy system, with an immediate emphasis on accelerating renewable energy deployment as part of a suite of measures.

2.2.9 To illustrate the scale of change envisioned for solar generation, the Climate Change Committee's Electricity Generation Sector Summary[13] for the Sixth Carbon Budget notes on page 14:

> *"Large-scale solar currently has 13 GW installed capacity in the UK, which requires 290 km². Maximising the potential of solar generation might entail using an additional 1,500 km²."*

2.2.10 This highlights that a several-fold increase in solar capacity (and the land area devoted to it) would be needed as part of meeting the Sixth Carbon Budget's requirements. Indeed, the Sixth Carbon Budget's analysis projects that electricity demand could at least double (or even triple) by 2050 compared to a 2018 baseline, due to the widespread electrification of vehicles and heating.

2.2.11 In 2025, the Climate Change Committee published the proposed Seventh Carbon Budget[3] which, if accepted and enacted by the Government, will extend the UK's carbon limits into the 2040s. This upcoming budget reinforces

the need for accelerated renewable electricity deployment to stay on track for the 2050 net zero goal. Table 7.5.1 of the Seventh Carbon Budget sets out an intent to achieve 82 GW of installed solar capacity by 2040, equivalent to more than quadrupling the current installed capacity within the next 15 years.

2.2.12 Each carbon budget, together with the 2050 net zero target, collectively drives the need for new low-carbon energy infrastructure, as the energy sector must decarbonise to meet these binding limits. This in turn necessitates urgent delivery of large-scale renewable energy projects like the Scheme.

2.3 Progress to Net Zero

Net Zero commitments and targets

2.3.1 As noted above, the UK now has a legally binding commitment to achieve net zero greenhouse gas emissions by 2050 (established through the 2019 amendment to the Climate Change Act 2008). In pursuit of this overarching goal, the Government has adopted a series of interim targets and benchmarks – notably the carbon budgets discussed in the previous section.

2.3.2 In addition to these domestic statutory requirements, the UK is a signatory to the Paris Agreement[4] (2015), a landmark international treaty under which countries pledged to limit global warming to well below 2°C and ideally to 1.5°C. Under the Paris Agreement framework, nations submit Nationally Determined Contributions (NDCs) – essentially national emission-reduction pledges. The UK has made significant commitments through its NDCs, including:

- **2030 Target**[14]: reduce economy-wide greenhouse gas emissions by at least 68% by 2030 (from 1990 levels), as announced in December 2020.
- **2035 Target**[15]: reduce emissions by at least 81% by 2035 (from 1990 levels), as announced in November 2024 – building on the Sixth Carbon Budget's 78% recommendation.

2.3.3 Together with the carbon budgets, these incremental targets establish a clear trajectory towards net zero and highlight the significant scale of decarbonisation required in the near to medium term.

2.3.4 Within the energy sector, the Government's Clean Power 2030 Action Plan[11] includes a target that Britain's electricity demand should be met entirely by "clean" generation by 2030, with at least 95% coming from low-carbon technologies (allowing only a small residual amount from unabated gas for energy security). Achieving this essentially carbon-free power system by 2030 is integral to reaching net zero, because early decarbonisation of electricity will enable deeper emissions cuts in other sectors (like transport and heating) through electrification.

Emissions reductions achieved to date

2.3.5 The UK has already made substantial progress in cutting greenhouse gas emissions over the past few decades. By 2023, national emissions had fallen to roughly 50% below 1990 levels[9], and provisional data published in early 2025 indicates approximately a 54% reduction from 1990[16]. In other words, the country is just over halfway toward the net zero 2050 goal.

2.3.6 The early carbon budgets have been met or exceeded, with the UK comfortably meeting the first three carbon budgets covering the period 2008 to 2022[9]. A primary contributor to hitting these initial targets was the rapid early decarbonisation of the energy sector, driven in particular by the phase-out of coal and significant growth in renewables. Coal's share of UK electricity generation has fallen from roughly 40% a decade ago to 0% today, replaced by low-carbon and alternative sources[9].

2.3.7 The most recent data[17] (for 2024) shows that about 65% of UK electricity generation came from low-carbon sources (renewables plus nuclear), with renewables alone contributing a record 50.8% of total generation – up from roughly 20% low-carbon generation in 2010. The result is that the carbon intensity of UK electricity is at an all-time low, a development cited by the

Climate Change Committee (CCC) as a principal success in the nation's decarbonisation journey[9].

2.3.8 This dramatic cut in emissions from the energy sector demonstrates what coordinated policy can achieve. A combination of supportive subsidies, market mechanisms (e.g. Contracts for Difference), and carbon pricing has driven clean investment and innovation. In turn, the costs of renewables have fallen significantly – the price of solar photovoltaic systems, for example, has dropped by roughly 85% in the past decade[5] – making subsidy-free projects such as the Scheme commercially viable and attractive to private investors.

Shortfalls and the need to accelerate

2.3.9 Notwithstanding the achievements to date, the CCC's 2025 Progress Report makes it clear that whilst the UK's 68% reduction target by 2030 is achievable, urgent action is required in several critical areas. A key priority action identified is to effectively deliver rapid expansion of the low-carbon electricity system[9].

2.3.10 The CCC observed that the energy-sector decarbonisation has thus far been a success story and that positive policy progress has been made in decarbonising electricity supply over the past year. However, they note that there are "*remaining uncertainties on the future electricity market arrangements and further challenges to deploying infrastructure to overcome*". The Committee further notes that urgent action is required in the priority actions in order to get the country on track to meet its targets[9].

2.3.11 A key area of concern identified by the CCC is the rate of growth in the pipeline of future renewables capacity, particularly solar capacity which is judged to be off-track. The overall renewables pipeline is deemed to be promising, however the CCC note that it will need to continue to grow to meet the clean power system goals by 2030. Offshore and onshore wind indicators have a strong pipeline of capacity and are judged to be on track, however this is not the case for solar. To achieve the Government's ambition in the Clean Power 2030 Action Plan, total operational capacity of renewables will need to more

than double by 2030. This will require a four-fold increase in solar compared to the average rate seen since the start of this decade. A rapid scale-up in supply of renewable and low-carbon electricity is therefore required with a strong and sustained deployment of renewables capacity, particularly solar[9].

2.3.12 For example, there is around 18 GW of solar energy capacity already installed, with another 5 GW planned. This brings the total solar capacity to 23 GW by 2027. However, even the lower end of the Government's target (45 GW) means nearly doubling this capacity in just a few years. To achieve this, around 4.5 GW of solar capacity will need to be installed every year. This is more than four times the average rate of recent years, although it is roughly in line with the record year of 2015, when 4.1 GW was added. The roll-out of solar therefore appears significantly off track and will need to improve to deliver its contribution to a decarbonised electricity system[9].

2.3.13 Reaching this goal will depend not just on ambition, but also on strong Government support and policies that make it easier and faster to roll out new solar projects. The Government has not yet issued its formal response to the Climate Change Committee's (CCC) 2025 Progress Report. However, its December 2024 response to the CCC's 2024 Report acknowledged that the UK was "*not on course to rise to the climate challenge*," signalling the need for urgent policy recalibration[10].

2.3.14 Following the 2024 general election, the new Government has taken rapid steps to address systemic delivery gaps. Key actions include lifting the de facto moratorium on onshore wind development, enhancing support for Contracts for Difference (CfD) auctions, and re-embedding net zero considerations into planning and infrastructure policy frameworks.

2.3.15 However, the delivery gap remains substantial. Without a marked acceleration in the expansion of the low-carbon electricity system, the UK remains at risk of breaching its statutory carbon budgets in the late 2020s and falling short of its 2030 emissions reduction target. A strong and sustained increase in the pipeline of solar energy capacity will be crucial.

2.3.16 This clear shortfall in progress is central to the need case for the Scheme.

The critical role of solar photovoltaics and battery energy storage in achieving Net Zero

2.3.17 As set out above, greatly expanding renewable and low-carbon energy capacity will be pivotal to closing the UK's net zero delivery gap – and solar photovoltaics (PV) and battery energy storage are especially critical to decarbonising the electricity supply.

2.3.18 Solar PV is now among the cheapest forms of power generation and can be deployed at scale relatively quickly. The UK's installed solar capacity has grown from virtually zero in 2010 to approximately 17.8 GW at the end of 2024, contributing around 5% of total electricity generation[18]. To align with net zero commitments, however, this expansion must vastly accelerate. The Government has set a target (in the Clean Power 2030 Action Plan) of reaching 45-47 GW of solar power by 2030. Based upon a current installed capacity of 16.6 GW (in Q2 of 2024), it will require installing well over 4 GW of new solar each year on average. The Seventh Carbon Budget[3] goes further, requiring 82 GW of solar capacity by 2040.

2.3.19 The CCC identifies solar PV as a key component of the future electricity mix, noting that renewables (especially solar and offshore wind) must underpin energy-sector decarbonisation given their falling costs and scalability[9]. Solar is also seasonally and geographically complementary to wind generation, which improves overall grid reliability when the two are deployed together.

2.3.20 Crucially, large-scale solar projects can be built faster than many other major generation types, often with construction timelines in the order of 1 to 3 years, meaning they can contribute to closing the 2030 capacity gap within the required timeframe.

2.3.21 Alongside an increase in solar and other renewables, there is a pressing need for expanded energy storage capacity to provide flexibility in a renewables-dominated grid. Solar and wind output is variable (solar produces electricity

only during daylight hours and varies with seasons), so storage systems are essential to shift excess generation to periods of high demand and to maintain security of supply.

2.3.22 The Government's Clean Power 2030 Action Plan emphasises the need to scale up energy storage as part of making the UK a "*clean energy superpower*" by 2030. It calls for a major increase in battery storage capacity – targeting around 27.1 GW of installed storage by 2030 (and 28.7 GW by 2035) – which represents roughly a six-fold increase from the circa 4.5 GW of battery capacity available at the end of 2024[11].

2.3.23 Achieving net zero will depend on rapidly scaling up both solar PV generation and battery storage over the coming decade, to provide abundant low-carbon electricity and the means to flexibly manage it on the grid.

East Park Energy and Net Zero

2.3.24 The trajectory of UK emissions and the policy responses described above establish a clear imperative for renewable energy infrastructure projects like the Scheme.

2.3.25 An analysis of progress towards net zero reveals both notable achievements (demonstrating the feasibility and benefits of decarbonisation) and major shortfalls (indicating an urgent need for additional action). In particular, the shortfall in planned emission reductions to 2030 – and the specific undersupply of solar generation capacity – underscore a pressing need to accelerate the deployment of large-scale solar PV across the UK.

2.3.26 The Scheme would directly contribute to closing this renewable capacity gap. With an export capacity of 400 MW (0.4 GW), it would increase the UK's solar generation base and produce enough clean electricity to power approximately 117,000 homes annually and save approximately 1,800,000 tonnes of CO_2

equivalent over its lifetime[1]. Furthermore, the co-located battery storage (with 100 MW of power capacity) would provide much-needed flexible output and grid-balancing services – capturing solar energy when it is abundant and dispatching it during peak demand or lower renewable periods, thereby improving system resilience.

2.3.27 These contributions are fully aligned with national net zero strategy, and importantly, the project is deliverable by 2030. That means the Scheme can start making a valuable contribution toward decarbonising the energy sector before the critical 2030 deadline for a predominantly clean electricity supply. In short, the Scheme will provide a timely and tangible boost to the UK's renewable capacity at the scale and speed required to help meet our net zero objectives.

2.4 Achieving British Energy Security

British Energy Security as a National Priority

2.4.1 In recent years, the UK Government has elevated energy security to a top-tier national priority, driven by the need for secure, domestic, and affordable energy supplies. The creation of the Department for Energy Security and Net Zero (DESNZ) in early 2023 exemplifies this focus.

2.4.2 The mission is to set Britain "*on course to greater energy independence*" by replacing decades of reliance on imported fossil fuels with cheaper, cleaner domestic sources of energy[6]. This strategic shift recognises that cheap, clean, and secure power is essential for economic growth and consumer welfare. The ultimate aim is a resilient energy system in which British consumers and industries are no longer exposed to the volatility of global fossil fuel markets.

*[1] Calculated based on the total GHG emissions offset by the project's electricity generation of circa 2,461,035 tonnes of CO_2 equivalent (based on the 'Grid Average' scenario as set out in Table 15.16 of **ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1]**), less the lifetime GHG emissions of the Scheme at circa 648,178 tonnes of CO_2 equivalent (set out in Table 15.13 of **ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1]**)*

Geopolitical Context

2.4.3 Recent geopolitical shocks have underscored why the UK is prioritising greater domestic energy security. The Russian invasion of Ukraine in February 2022 triggered an unprecedented energy price crisis across Europe, given Russia's role as a major gas and oil exporter.

2.4.4 Global gas prices spiked to record highs in 2022, with UK wholesale gas reaching approximately 20 pence per kWh in August 2022 – around ten times higher than pre-crisis levels[19]. These spikes fed directly into UK energy bills. By October 2022 the regulated price cap was set to jump by approximately 80% (gas +91%, electricity +70%) before emergency government intervention limited the increase[19].

2.4.5 The UK, like its European neighbours, was forced to spend enormous sums to shield consumers – an estimated £44 billion in UK government support was allocated to help households in 2022–2023[20], almost equivalent to the UK's entire annual defence budget[21]. Even with subsidies, millions of families faced fuel poverty as bills doubled compared to the previous year. Crucially, the root cause was the UK's exposure to the volatile international gas market.

2.4.6 The UK still relies on gas-fired power for roughly 35–40% of its electricity and uses gas to heat over 80% of homes[17]. North Sea gas production has been in decline for years, so more than half of Britain's gas is now imported. But even domestic North Sea gas did not protect consumers – as the Energy Secretary noted, "*whether the gas comes from the North Sea or is imported, it is sold at the same price on the international market… Britain is a price-taker, not a price-maker.*"[22] In other words, when global gas prices surged due to Russia's war, UK consumers paid the price regardless of local supply.

2.4.7 This painful lesson – that continued dependence on fossil fuels leaves the UK vulnerable to events beyond its control – has driven home the need for a more secure, self-reliant energy system.

2.4.8 Reducing reliance on internationally traded fossil fuel markets is now viewed as a national security imperative, especially as the world faces an "*age of heightened geopolitical risk.*"[22] Strengthening domestic energy generation, particularly from sources that are insulated from global turmoil, is seen as essential to protect the country from future energy shocks.

UK policy response and targets

2.4.9 To focus attention on achieving energy security, in April 2022 the UK Government launched the British Energy Security Strategy, which sets out plans to accelerate domestic energy production with the twin goals of improving energy security while meeting net zero commitments. Crucially, the British Energy Security Strategy made clear that greater deployment of renewables is pivotal for energy security, noting that the growing share of renewables in UK power generation is already reducing exposure to volatile international fossil fuel markets[5].

2.4.10 The British Energy Security Strategy was the first policy document to set the Government's ambition of reaching 70 GW of installed solar capacity by 2035 — a five-fold increase from the then-installed capacity of approximately 14 GW. These ambitions were reaffirmed and expanded upon in the *Powering Up Britain: Energy Security Plan*[7] (March 2023) and the *Clean Power 2030 Action Plan*[11] (December 2024). The Energy Security Plan emphasises that "*energy security and net zero are two sides of the same coin*," meaning a rapid rollout of low-carbon power is needed to deliver a system that is both cleaner and more secure.

2.4.11 The Clean Power 2030 roadmap, in turn, commits to meeting 100% of the UK's annual electricity demand with "clean" sources by 2030 (defined as renewables, nuclear, and other low-carbon technologies), with any unabated gas generation used only as a last resort for backup[11]. Achieving this would put the UK on track to become a net exporter of electricity in the 2030s, marking a dramatic turnaround from the import dependence of past decades and greatly enhancing energy sovereignty.

The critical role of solar photovoltaics and battery energy storage in achieving Energy Security

Solar Photovoltaics

2.4.12 Solar energy has emerged as a cornerstone of the UK's strategy to secure long-term energy independence. As an abundant domestic resource, sunlight is immune to geopolitical interference. Every megawatt of solar capacity installed in the UK substitutes for imported gas, lessening our exposure to international fossil fuel markets.

2.4.13 Solar technology has also matured to become one of the cheapest forms of energy generation. Government figures highlight that the cost of solar panels has fallen by approximately 85% in the past decade, contributing to record-low prices for solar electricity. Since 2015 alone, UK solar and onshore wind costs have dropped by over one-third, making renewables the lowest-cost option for generating power[5].

2.4.14 By contrast, fossil-fuel electricity is tied to volatile commodity prices: during the 2022 crisis, gas-driven electricity prices spiked to 5–7 times higher than typical offshore wind prices[7]. Solar energy thus offers a double benefit – greater security and lower long-term cost. It can also be built quickly, relative to building a power station.

2.4.15 Crucially, as solar and other renewables scale up, they help stabilise electricity prices. Under Britain's marginal pricing system, expensive gas-fired plants often set the market price for all electricity; but when renewables provide more of the total mix, gas plants run less and set the price less frequently. Analysis of the 2022 energy price crisis found that domestic renewables acted as a brake on surging costs, moderating what would otherwise have been even higher wholesale electricity prices[7]. In effect, renewables serve as a price stabiliser by reducing the influence of gas in the market.

2.4.16 Consequently, increasing installed solar capacity is not only vital for decarbonisation but also an economic safeguard against future fossil fuel price swings. Every new solar farm or rooftop array incrementally reduces the UK's vulnerability to supply shocks. This is part of the reason why solar PV is identified as critical national infrastructure for energy security.

Battery Energy Storage

2.4.17 To fully realise the energy security benefits of renewables, battery storage and other grid flexibility measures are critical. Solar and wind are intermittent by nature, and energy storage technologies ensure that renewable power can be stored when generation exceeds demand and released when demand exceeds generation, enhancing overall reliability and reducing the costs of curtailment.

2.4.18 The term curtailment refers to an enforced reduction in power production, when there is too much electricity in the grid. When surplus generation cannot be used or transmitted, the National Electricity System Operator (NESO) is forced to "curtail" renewable output – essentially asking wind or solar farms to switch off – resulting in vast amounts of clean energy being wasted. The annual cost of renewable curtailment is currently estimated to be in the hundreds of millions of pounds[11], which will quickly rise into the billions if further energy storage solutions are not connected to the grid alongside the growth in renewables – a cost burden which is ultimately passed onto businesses and consumers through higher bills.

2.4.19 Installing a BESS alongside the solar array directly mitigates curtailment and strengthens grid stability and reliability. Instead of being shut off during periods of surplus generation, the solar farm's excess output can be stored on-site and released later when demand rises or when network capacity is available. This ensures that renewable energy which would otherwise be wasted is put to use, maximising the clean power contribution of the project and improving overall system efficiency.

2.4.20 The British Energy Security Strategy explicitly supports co-locating solar farms with battery storage to maximise usable output and the efficiency of land use. A diversified renewables-based system with ample storage is far more secure than one without – it can withstand sudden supply shocks or surges in demand because stored energy (and a spread of generation sources) act as a buffer. This contrasts with an energy system overly dependent on fuel imports that can be disrupted, or on just-in-time gas-fired generation that is exposed to price spikes.

2.4.21 By reducing dependence on gas-fired peaking plants and shielding consumers from fossil fuel price volatility, large-scale batteries and related technologies increase Britain's energy autonomy. The long-term vision is a self-reliant electricity system where most power is generated from UK-based renewable sources and buffered by significant storage capacity – a system far less prone to external shocks. In practical terms, that means when the sun is shining or wind is blowing, excess energy can be stored and later used during evenings or calm periods, rather than the UK needing to import gas or pay for standby generation. This capability will be essential for a secure, affordable net zero energy system.

East Park Energy and Energy Security

2.4.22 The Scheme would directly contribute to the UK's energy security agenda. By generating approximately 400 MW of clean, home-grown electricity, East Park Energy will reduce dependence on imported gas-fired power, enhancing the security of supply. The inclusion of on-site battery storage means the solar farm's output can be stored and dispatched when it is most needed – for example, supporting the grid on dark winter evenings or at times of system stress – rather than being wasted at midday when solar generation is high. In effect, the Scheme will function not just as a generation asset but as a flexible energy hub that helps balance supply and demand locally.

2.4.23 The Scheme is fully in line with the Government's vision of a modernised, resilient power system as outlined in the British Energy Security Strategy and

the Energy Security Plan. It embodies the "*two sides of the same coin*" principle that net zero and energy security go hand-in-hand. By delivering secure, low-cost renewable power, the Scheme will strengthen energy independence and protect consumers and businesses from future energy price shocks. In summary, East Park Energy will make the electricity system cleaner and more secure in tandem – precisely the dual benefit that current national policy seeks from new energy infrastructure.

2.5 Delivering Green Economic Growth

National Policy and Economic Strategy

2.5.1 As set out above, the UK's commitment to net zero by 2050 is not only an environmental imperative but also increasingly seen as an engine for economic growth. National policy has come to recognise the clean energy transition as a major opportunity to boost investment, jobs, and industrial competitiveness. An independent government review of net zero in 2023 (the '*Skidmore Review'*) described the transition as "the economic opportunity of the 21st century" for the UK, underscoring that decarbonisation, energy security, and economic prosperity are intrinsically connected[23].

2.5.2 Recent Government strategies such as the *British Energy Security Strategy* (April 2022) and *Powering Up Britain: Net Zero Growth Plan* (March 2023) reinforce this view, emphasising that cutting emissions can drive job creation, investment, and competitiveness across the country.

2.5.3 Since 2020, over 80,000 "green jobs" have been created as a direct result of climate and energy policies[8]. The Net Zero Growth Plan stresses that the transition to net zero offers opportunities to "*create well-paid and high-skilled jobs, support levelling-up and reinvigorate our industrial heartlands*." The target of installing 70 GW of solar by 2035 is central to delivering on these opportunities.

2.5.4 The current Government was elected in 2024 with a mission to make Britain a "*clean energy superpower*," and it accelerated the target for a fully

renewable and low-carbon power system to 2030 – five years earlier than the previous 2035 goal[11]. Achieving this ambitious target will require a massive scaling-up of renewable deployment, as described earlier.

2.5.5 This agenda is at the heart of the Government's economic strategy, with an objective of mobilising billions of pounds of private investment and creating around 650,000 jobs by 2030 through growth in green industries[24].

2.5.6 To drive this mission forward, a new publicly owned entity, Great British Energy, was established in 2024 and gained statutory authority in early 2025 to invest in clean energy generation. Great British Energy will partner with the private sector to deliver new projects and build domestic supply chains – a strategy aimed at securing economic value from renewable development within the UK[23].

2.5.7 These broad goals align with, and bolster, the policy support for the Scheme. There is clear consensus that expanding solar capacity and battery storage is not only an environmental necessity but also an economic opportunity for the UK.

Regional and Local Policy and Strategy

2.5.8 Huntingdonshire District Council has formally declared a Climate Crisis and Ecological Emergency, adopting a Climate Strategy & Action Plan[25] in February 2023. This strategy sets an ambitious goal of achieving net zero carbon emissions from the Council's own operations by 2040. It also provides a framework for district-wide action to reduce emissions, enhance biodiversity, and transition infrastructure toward a low-carbon future. Crucially, the strategy highlights the deployment of renewable energy technologies such as large-scale solar farms as a "critical enabler" of carbon reduction across the district. The Scheme directly supports Huntingdonshire's climate objectives by adding significant local renewable generation capacity. In doing so, it helps close the carbon reduction gap identified in the strategy and contributes to resilient, low-carbon energy supply for the area. The Scheme will also incorporate biodiversity enhancements and community

outreach, aligning with the strategy's themes on "Nature" and "Community" to ensure co-benefits alongside decarbonisation.

2.5.9 To inform spatial planning policy on renewables, Huntingdonshire commissioned a Renewable Energy Assessment[26] (Document E, November 2024) evaluating the district's capacity for low-carbon energy development. This study identified broad areas (which include the Site) as having high potential for solar deployment. The Assessment modelled two growth scenarios for ground-mounted solar: a Business-as-Usual case and an "Ambitious" case. Even under the baseline scenario, an additional 308 MW of solar capacity is needed in Huntingdonshire by 2046 (equivalent to circa 31 new 10 MW solar farms). The ambitious scenario calls for 409 MW by 2050 (circa 41 solar farms) to support a low-carbon energy mix. These figures demonstrate a clear policy drive for significant expansion of renewable infrastructure in the district. By delivering up to ~400 MW of solar generation, the Scheme would make a substantial contribution toward these local targets. The Scheme alone would fulfil a large share of the district's identified solar capacity need, strongly reinforcing Huntingdonshire's renewable energy ambitions and its forthcoming Local Plan policies on climate change.

2.5.10 At the county level, Cambridgeshire is developing a Local Area Energy Plan[27] (LAEP) to ensure the right energy infrastructure is in place for a low-carbon, net zero economy. This plan will set out the infrastructure requirements to support current and future growth sustainably across Cambridgeshire. Although still in development, the LAEP reflects the county's commitment to facilitating clean energy generation and resilient networks. The Scheme aligns closely with the LAEP's objectives by providing a major new source of renewable electricity that can bolster local grid capacity and enable the electrification of transport, heating and industry in line with net-zero plans.

2.5.11 Regionally, the Cambridgeshire & Peterborough Combined Authority (CPCA) underscores clean growth in its Corporate Strategy 2023-26[28] (updated January 2025). The CPCA strategy recognises the urgent need to tackle energy-related challenges and improve infrastructure resilience. It references

the forthcoming LAEP as a key tool to ensure power sufficiency for growth and commits to developing a Local Growth Plan aligned with the national Industrial Strategy, with clean energy as a priority sector. The Scheme responds directly to these strategic priorities. By delivering clean energy deployment at scale, the Scheme addresses CPCA's emphasis on decarbonising the power supply, improving regional energy security, and unlocking low-carbon economic growth opportunities. The Scheme will thereby help the CPCA meet its dual aims of reducing carbon emissions and creating green jobs as part of an inclusive, net-zero economy.

2.5.12 Bedford Borough Council has set out its pathway to net zero in the Carbon Reduction Delivery Strategy 2023-2025[29], which focuses on cutting emissions through energy efficiency, renewable energy uptake, and proactive carbon management. While this strategy primarily targets decarbonising the Council's own operations, it reinforces a broader local commitment to clean energy generation and resilience against energy price volatility. The Scheme directly supports Bedford's direction of travel by adding a large-scale source of renewable electricity within the region. This contribution strengthens borough-wide decarbonisation efforts and enhances energy security, consistent with the strategy's aims. In practical terms, the Scheme's output of low-cost solar power will help reduce reliance on fossil fuels locally and buffer the community from energy market swings; outcomes very much in line with Bedford's carbon reduction and energy resilience goals.

2.5.13 Bedford's commitment to green growth is further detailed in its Sustainable Development and Environmental Efficiency Strategy[30] (SDEES). This provides a holistic framework for environmentally sustainable development across the borough. The SDEES promotes low-carbon development, resource efficiency, and climate resilience in new projects. It specifically encourages integrating renewable energy technologies into infrastructure and fostering innovation in sustainable design. The Scheme exemplifies these principles. It will deliver a large renewable energy installation while implementing best practices in biodiversity enhancement and sustainable

land use (such as habitat creation around the solar arrays). By doing so, the Scheme not only delivers clean electricity but also demonstrates environmentally responsible development, directly reflecting Bedford's strategic vision for growth.

2.5.14 At the wider regional level, the East of England has articulated a bold clean growth agenda through publications like the Opportunity East Investment Prospectus[31] launched at UKREiF 2025. This prospectus, backed by the East of England Local Government Association and partners, positions the region as a leading destination for sustainable investment. It emphasises that vital infrastructure which works towards net zero (with a strong focus on renewable energy) is "integral to sustainable development" and at the heart of the region's economic growth strategy. With targeted investment in green industries, the East of England's economy is projected to grow to £220 billion by 2035, cementing the region's status as a national "clean growth hub". The Scheme contributes directly to this regional vision. By delivering a significant renewable energy asset, the Scheme provides the kind of net zero aligned infrastructure that the Prospectus identifies as crucial to the East's future growth. The Scheme will improve grid resilience and energy security in the East of England, helping to attract green investment and high-value jobs. In doing so, it will reinforce the region's role in leading the UK's low carbon transition and achieving the clean growth objectives set out in Opportunity East.

2.5.15 Regional leaders have also coalesced around an Eastern Powerhouse Clean Energy Vision (October 2024) aimed at making the East of England the powerhouse of the UK's net zero future. This vision calls for accelerated deployment of solar, wind, and other renewables, noting that the East is "uniquely positioned to spearhead the energy transformation" due to its robust energy infrastructure and abundant renewable resources. It stresses a commitment to sustainable economic growth in the region, underpinned by a diverse clean energy mix that will strengthen the UK's grid and align with national climate goals. The Eastern Powerhouse initiative also highlights the

opportunity to create hundreds of thousands of green jobs through the clean energy transition – over 500,000 jobs nationally by 2030, according to recent estimates. By rapidly expanding solar generation capacity in the East, the Scheme will help fulfil the Eastern Powerhouse advocacy for renewable deployment. The Scheme will not only supply clean power to drive down carbon emissions, but also generate new employment and supply-chain opportunities locally during its construction and operation, thereby contributing to the green job creation and skills development that the Eastern Powerhouse vision associates with clean energy projects.

2.5.16 The Oxford–Cambridge Arc, which spans Bedfordshire (including Bedford) and Cambridgeshire, is another strategic initiative shaping the region's future. The Arc is envisioned as a world-class growth corridor that will deliver up to 1.1 million new jobs by 2050 while pioneering sustainable, low carbon development. Regional partners and the UK Government have emphasised that growth in the Arc must be achieved in an environmentally responsible way, setting high standards for carbon-neutral development and green infrastructure. Notably, the Arc's economic prospectus[32] commits that the area will become "at least carbon neutral before 2050", ensuring transformative economic growth goes hand-in-hand with meeting climate targets.

2.5.17 The Arc's vision documents call for new developments to meet rigorous sustainability criteria (e.g. net zero building standards, integrated renewable energy and active travel networks) in order to protect environmental quality while expanding the economy. The Scheme aligns strongly with the Oxford–Cambridge Arc's green growth agenda. As a source of zero-carbon electricity within the Arc, the Scheme would support the Arc's commitment to net zero carbon by 2050 by supplying clean power to homes and businesses. This improves the likelihood that new housing and industry in the Arc can be powered by renewables, decoupling growth from emissions. Additionally, the Scheme's substantial ecological mitigation and biodiversity enhancements complement the Arc's "green arc" ambitions, which seek to double the area

of land managed for nature by 2050 and deliver net biodiversity gain alongside development.

2.5.18 Together, these documents demonstrate strong regional support for renewable energy infrastructure and provide a strategic foundation for the Scheme. The scheme contributes meaningfully to the East of England's clean energy goals and complements national policy objectives under EN-1 and EN-3.

East Park Energy and Green Economic Growth

2.5.19 The Scheme will make a substantial contribution to green economic growth objectives at all levels – local, regional, and national.

2.5.20 In terms of direct economic benefits, the Scheme represents a significant investment in the region (on the order of hundreds of millions of pounds in capital expenditure), which will generate jobs and business for the local economy. During the construction phase, the Scheme is expected to create a range of employment opportunities – from civil engineering and electrical installation roles to support services – with the use of local contractors and labour wherever possible. The Applicant has prepared an **outline Skills, Supply Chain and Employment Plan [EN010141/DR/7.12]** that provides further detail and commitments in relation to local job opportunities.

2.5.21 An influx of construction activity will benefit local businesses such as equipment suppliers, transport and logistics firms, accommodation providers, and hospitality venues for workers, providing a short-term economic stimulus during the build period. The Applicant aims to prioritise procuring the services of local businesses and contractors and the use of local employees, where possible.

2.5.22 Once operational, the Scheme will support an anticipated 20 full time equivalent permanent jobs (or long-term contracted positions) for ongoing operations, maintenance, and security of the Site over its operational life of approximately 40 years. Most of the jobs created would relate to the ongoing

operations, maintenance, and security of the solar PV and BESS facility, as well as landscape and habitat maintenance. It will also generate business rates revenue for the local authority over its lifetime. Solar Energy UK notes that large solar farms raise "*significant revenue for local government, via business rates*", funds which can be reinvested in public services or further green initiatives locally[33].

2.5.23 Beyond these localised impacts, the Scheme will help drive wider economic gains associated with decarbonisation. By exporting electricity to the grid (enough to power tens of thousands of homes), the Scheme improves energy security and helps shield households and businesses from volatile international fossil fuel markets. The availability of clean, affordable power is increasingly seen as a foundation for competitive economic growth; high energy costs and insecurity can impede industrial investment.

2.5.24 The contribution to carbon reduction is not just an environmental gain; it also enhances the regions appeal for investors and businesses. Companies are increasingly factoring clean energy availability into decisions on where to locate operations. Having a new large-scale renewable energy development in the Bedford / Cambridgeshire region could attract businesses looking to power their facilities with low-carbon electricity or to site themselves near sources of clean energy (for instance, advanced manufacturing or data centres seeking renewable power purchase agreements). In this way, the Scheme can have an indirect job-creation effect by improving the local infrastructure for sustainable growth.

2.6 The Need to Rapidly Increase Electricity Generation

2.6.1 The UK is projected to experience a significant and sustained rise in electricity demand over the coming decades, primarily driven by the widespread electrification of transport, heating, and industrial processes as part of the national pathway to net zero.

2.6.2 According to the National Energy System Operator's *Future Energy Scenarios 2025*[34] (FES 2025), electricity consumption is set to increase

markedly as millions of electric vehicles and heat pumps are deployed to replace conventional petrol, diesel, and gas-based systems. Across three out of the four net zero-compliant scenarios, annual electricity demand is forecast to more than double by 2050, with peak demand rising even more sharply due to the coincident nature of heating and transport loads. Even in the least optimistic scenario (Falling Behind), demand still increases substantially, nearly doubling to 559 TWh (about 1.9 times). In more ambitious pathways (for example Electric Engagement), demand could nearly triple.

2.6.3 Key FES 2025 projections include:

- **Total Electricity Demand**: Increasing from approximately 290 TWh in 2024 to between 559 and 797 TWh by 2050, depending on the scenario. In all scenarios in which net zero is achieved, this represents an increase of over 100%, driven by widespread electrification and digitalisation.
- **Peak Demand**: Rising from a historical peak of around 58 GW to up to 144 GW by 2050, with a rapid acceleration in the uptake of low carbon heating and transport from today to 2030. This will be driven by clean power, boosting energy efficiency.
- **Transport Electrification**: In the 'Holistic Transition' scenario, electric vehicles play a major role in the energy system. Together with smart charging technology known as Vehicle-to-Grid (V2G), which allows EVs to give electricity back to the grid when needed, they provide up to 51 GW of flexibility. This makes them the single largest contributor to managing supply and demand across the whole energy network under this scenario.
- **Heating Electrification**: Electricity demand for heat is expected to see tens of TWh of new demand, from 38 TWh in 2024 to up to 183 TWh in 2050. This is driven mainly by large-scale deployment of electric heat pumps. Heat electrification is projected to become a major driver of peak load, especially on cold days.

2.6.4 FES 2025 provides a robust evidence base for the continued and accelerated deployment of solar generation and energy storage as part of the UK's transition to a decarbonised energy system. Solar is identified as a cost-

competitive, scalable, and high-performing technology, integral to meeting net zero targets. The NESO projects that total installed generation capacity will increase by 60% to 73% from today by 2030 alone[34], with solar and wind forming the backbone of this expansion. All pathways see high levels of solar deployment. Likewise, the report makes specific reference to co-located assets, such as grid-scale battery storage for solar farms, as leveraging the combined power of solar generation and battery storage over shared connections. This technology is noted as essential for not only delivering clean power, but also for enhancing system flexibility and supporting consumer participation in a smarter, more responsive energy system.

2.6.5 In the net zero aligned *Electric Engagement* and *Holistic Transition* scenarios, solar capacity is forecast to rise substantially, contributing to a doubling of total installed generation capacity by 2050. These scenarios reflect pathways where electrification of heat and transport is widespread, and where consumers actively engage with energy use through smart technologies and flexible tariffs. Solar generation is positioned as a critical enabler of this transition, helping to reduce reliance on unabated fossil fuels and supporting the integration of other low-carbon vectors such as hydrogen and bioenergy. NESO emphasises that delivering infrastructure low carbon electricity and storage infrastructure, at pace, is essential to unlock private investment, meet rising electricity demand, and ensure energy security.

2.6.6 In the local area of Bedford Borough and Huntingdonshire District, the need for new renewable generation is evident in the current shortfall of clean energy production within the region. The Department for Energy Security and Net Zero (DESNZ) publishes data on electricity use at district level and the proportion of that use met by local renewable generation.

2.6.7 For Bedford Borough, the data show that in 2023 (the latest available year) the borough consumed approximately 673.5 GWh of electricity (domestic and non-domestic consumers combined)[35]. In the same year, only about 95 GWh of electricity was generated from renewable sources within the district – roughly 14% of its total demand[36]. According to the DESNZ breakdown, this

95 GWh of local renewable generation comprised roughly 72 GWh from solar power and 23 GWh from onshore wind (with additional small contributions from hydro, anaerobic digestion, sewage gas, landfill gas, municipal solid waste, and biomass not specifically reported). Factoring in the 95 GWh of renewable output, Bedford Borough's renewable generation deficit in 2023 was on the order of 578.5 GWh. In other words, about 86% of the electricity consumed in the borough was not met by renewables.

2.6.8 For Huntingdonshire District, the data show that in 2023 (the latest available year) the district consumed approximately 728.8 GWh of electricity (domestic and non-domestic consumers combined). In the same year, about 334.6 GWh of electricity was generated from renewable sources within the district – roughly 46% of its total demand. According to the DESNZ breakdown, this 335 GWh of local renewable generation comprised roughly 141.1 GWh from solar power, 181.1 GWh from onshore wind, and 12.4 GWh from landfill gas (with additional small contributions from hydro, anaerobic digestion and biomass not specifically reported). Factoring in the 334.6 GWh of renewable output, Huntingdonshire District's renewable generation deficit in 2023 was on the order of 394.2 GWh. In other words, about 54% of the electricity consumed in the district was not met by renewables.

2.6.9 Based on the FES 2024 outlook, it is reasonable to assume that over time that reliance on electricity as an energy source will increase substantially as the use of fossil fuels is phased out for heating and transport. Thus, while the current data illustrates the gap under today's conditions, the actual demand for electricity in Bedford and Huntingdonshire will grow over the next few decades – and this electricity will need to come from renewable sources if climate goals are to be achieved.

2.6.10 The Scheme can make a meaningful contribution toward closing this gap, as it is conservatively expected to generate 433.2 GWh of electricity in its first year. This represents about 44.5% of the combined current annual electricity demand that is not already being met by renewables across Bedford and Huntingdonshire (i.e. approximately 44.5% of the present 972.7 GWh

renewable shortfall). Put simply, the Scheme could theoretically supply almost half of all the electricity that Bedford Borough and Huntingdonshire District collectively currently consume but source from non-renewable generation. This would be a substantial contribution toward the area's current and future electricity requirements and would substantially advance the decarbonisation of the energy supply in the region.

2.7 Grid Reform

2.7.1 The UK's electricity grid connection queue has grown to unprecedented levels, leading to long wait times and a misalignment with national needs. As of late 2024, over 560 GW of generation was in the transmission connection pipeline. This figure is roughly three times what is required for the UK's net zero scenarios. Many proposed projects in this queue are so-called 'zombie' or speculative projects with little realistic chance of completion. Nevertheless, they still occupy queue positions and push firm connection dates for genuine projects into the 2030s or 2040s. This situation creates uncertainty over where and when new network infrastructure is needed. It has been delaying viable projects, undermining investor confidence in the energy transition.

2.7.2 The 'first-come, first-served' grid connection process has been identified as a key bottleneck. This process has allowed early applicants to hold grid capacity rights even if they are not ready to build, blocking later-stage, ready projects from progressing. It is now widely recognised that the existing connection regime cannot deliver the clean power needed by 2030 without fundamental reform. Simply speeding up network construction or retaining the queue status quo will not achieve the UK's targets.

2.7.3 In response, the NESO, with support from the Government and Ofgem, launched a comprehensive Connections Reform Programme in 2023. Following extensive consultation, NESO published its proposed reforms in late 2024, culminating in the launch of the 'Gate 2 to Whole Queue'[37] (G2TWQ) process in July 2025. This marks a major shift in how transmission-connected projects are to be assessed and prioritised.

2.7.4 NESO's proposal is for a transition from the outdated queue model to a gated, evidence-based system that prioritises projects which are both ready to build and strategically needed. This 'first ready, first connected' approach is designed to unlock capacity for viable schemes and align grid development with national decarbonisation goals.

2.7.5 Under the new framework, projects must meet defined Readiness Criteria. This would include exclusive land rights, planning consent or a submitted DCO application. It also requires a demonstration of Strategic Alignment with the capacity needs identified in the Government's Clean Power 2030 Action Plan[11]. Projects that fail to meet these criteria will receive only indicative (non-firm) offers or risk losing their queue position altogether.

2.7.6 By removing speculative proposals and focusing on truly viable projects, the reform aims to cut the queue size by about two-thirds, freeing up an estimated 500 GW of capacity on the network. This overhaul is expected to turbo-charge connection ready projects – not only driving progress toward the 2030 clean power goal but also unlocking billions of pounds of investment in new generation and storage.

2.7.7 The evidence submission window for transmission-connected projects opened on 8th July 2025 and closed on 29th July 2025. At the time of writing, NESO have started a process of reprioritising over 3,000 transmission queue projects based on submitted evidence, with new connection offers expected to be issued from Autumn 2025. Subject to Ofgem's final approval, the reformed process will go live in Q4 2025, aligning with the delivery milestones set out in the Clean Power 2030 Action Plan. It will ensure that the grid connection queue contains the right mix of projects to meet 2030 targets.

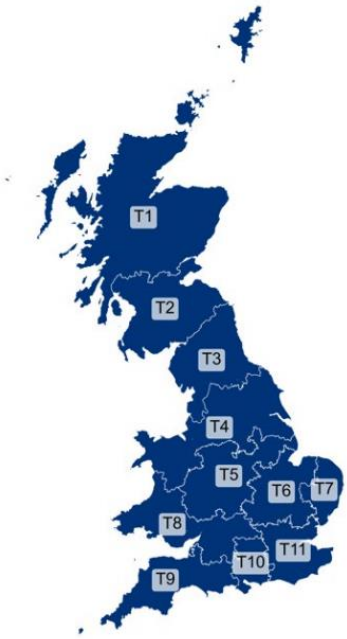
2.7.8 The Strategic Alignment Criteria are defined in the Connections Reform Annex (re-published April 2025), which sets out both national and locational capacity requirements across the UK's transmission and distribution networks. The Scheme is transmission-connected and lies within Transmission Zone T6, part of the Central England region. As shown in Table

3 of the Annex[12], this region has been identified as a priority area for solar deployment, with one of the highest transmission-connected solar capacity allocations in the UK. This reinforces the strategic case for solar schemes in this area under NESO's reformed grid connection process.

Image 1: Clean Power 2030 Connections Reform Annex – Table 3

Table 3: Mapping of transmission network region codes to transmission region names

Transmission network region code	Transmission network region name
T1	N. Scotland
T2	S. Scotland
T3	N. England
T4	N. Wales, the Mersey & the Humber
T5	Midlands
T6	Central England
T7	E. Anglia
T8	S. Wales & the Severn
T9	S.W. England
T10	S. England
T11	South-East England



2.7.9 Table 2 of the Annex[12] (see Image 2 below) then sets out, for each network region, the future transmission-connected solar energy and battery storage capacity breakdown.

Image 2: Clean Power 2030 Connections Reform Annex – Table 2

Table 2: Regional capacity breakdowns for transmission connected technologies required for 2030[20] and 2035[21]

Transmission network region	Solar (MW) 2030	Solar (MW) 2035[22]	Onshore wind (MW)[23] 2030[24]	Onshore wind (MW) 2035	Batteries (MW)[25] 2030	Batteries (MW) 2035
N. Scotland	100	-	5,500	-	1,900	1,900
S. Scotland	600	-	8,800	-	3,900	3,900
N. England	500	-	-	-	800	800
N. Wales, the Mersey and the Humber	1,200	-	300	-	4,200	4,200
Midlands	4,000	-	-	-	1,300	1,300
Central England	2,100	-	-	-	500	500
E. Anglia	100	-	-	-	200	200
S. Wales and the Severn	1,100	-	1,300	-	900	900
S.W. England	300	-	-	-	400	400
S. England	200	-	-	-	100	100
South East England	600	-	-	-	1,700	1,700
GB total	**10,800**	**-**	**15,900**	**-**	**15,900**	**15,900**

Note: MW capacity figures have been rounded to the nearest 100 MW.

2.7.10 Image 2 (referenced above) indicates that for the Central England transmission area (ref. T6 area), NESO has identified a need for 2,100 MW of solar capacity to be installed by 2030. For battery storage, a need of 1,300 MW by 2030 is identified. The Connections Reform Data Impact Assessment Part B – Workbook[38] (December 2024) shows that there is currently about 307 MW of transmission-connected solar within the region, against the target of 2,100 MW by 2030.

2.7.11 The Scheme would be able to contribute approximately 400 MW toward this target.

2.7.12 It is clear, therefore, that there is available headroom within the transmission network for new solar capacity, and that the Scheme squarely aligns with the geographical capacity established in the Clean Power 2030 Action Plan for the Central England region.

2.7.13 The Scheme is forecast to be operational by 2030, which means it will be generating electricity for the grid in line with the Government's 2030 target for a predominantly clean electricity supply. This timeline aligns with both national policy and the expectations of the reformed connections regime.

2.7.14 The project's deliverability is further reinforced by the grid reforms described above: having met key milestones (exclusive land rights secured, a grid connection agreement in hand for 400MW export, and a DCO application submitted), the Scheme is exactly the type of "ready and needed" project that the system will prioritise.

2.7.15 In summary, East Park Energy has a confirmed path to connection and operation well before 2030, with no known outstanding grid barriers.

2.8 Summary

2.8.1 The urgent and substantial need for the Scheme is clearly established by national policy and statutory requirements aimed at achieving net zero emissions by 2050, as mandated by the Climate Change Act 2008. The UK Government's legally binding climate goals, combined with ambitious interim carbon budgets and international commitments under the Paris Agreement, underscore the necessity of accelerating investment in renewable energy projects this decade.

2.8.2 Overarching National Policy Statement for Energy (EN-1) explicitly identifies an urgent need for new energy infrastructure of the type proposed and directs that substantial weight be given to this need when considering development consent applications. EN-1 makes clear that the Government has demonstrated the urgency of such infrastructure, and that individual projects do not need to have their contribution to need assessed separately.

2.8.3 Despite the notable progress the UK has made in reducing emissions, current deployment rates of renewable electricity infrastructure – particularly solar PV and battery storage – are significantly behind what is required to meet the next set of carbon budget milestones and longer-term net zero objectives.

The Climate Change Committee and other expert bodies have highlighted an urgent need to scale up renewable deployment, singling out solar energy as critical to the UK's decarbonisation strategy due to its cost-effectiveness, rapid build-out capability, and potential to substantially reduce dependence on volatile fossil fuel markets.

2.8.4 Reinforcing this need is the UK's strategic focus on energy security, particularly in light of recent global events that have exposed the vulnerabilities of fossil fuel dependence. Solar power and battery storage directly enhance national energy resilience by providing stable, domestic and low-cost energy supplies, thereby protecting consumers and businesses from international market shocks. In effect, the Scheme addresses two national priorities simultaneously: delivering clean energy and strengthening energy independence.

2.8.5 Regionally, the project aligns with the East of England's ambition to become a "global clean energy leader" and to deliver "the jobs of the future in renewable energy". It will drive substantial economic benefits in the region through job creation, local supply-chain opportunities, and enhanced industrial competitiveness in a low-carbon economy. Locally, the Scheme directly contributes to Bedford Borough, Cambridgeshire County and Huntingdonshire District's Climate Emergency targets by addressing the significant renewable generation deficit and supporting the area's transition to a more resilient, low-carbon energy system. It also complements and amplifies other green initiatives in the locality, helping to establish a cluster of low-carbon technologies that can spur further innovation and investment.

2.8.6 In summary, the Scheme is essential for closing critical gaps in renewable energy capacity, for meeting statutory climate obligations, for strengthening British energy security, and for catalysing significant economic and environmental benefits at local, regional, and national scales. The project is fully deliverable ahead of 2030 and is strategically aligned with current grid reform efforts to prioritise ready-to-build capacity. There is a clear and

demonstrable need set out in NPS EN-1 for the Scheme – it represents a critical national priority on the path to net zero.

3.0 THE SITE AND SITE CONTEXT

3.1 The Site

3.1.1 The Site location is shown on the **Location Plan [EN010141/DR/2.1]**, which shows the Order Limits for the Scheme. The Site area extends to approximately 773 hectares (ha).

3.1.2 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, for ease of reference the Order Limits have been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.
- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary, and from Little Staughton Road to the north-west.

- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

3.1.3 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and an arable field.
- **Grid Connection** – Site D to Eaton Socon Substation – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

3.2 Site Context

Local Context

3.2.1 The Site is located on the south side of a broad shallow clay vale landform formed by a number of west-east tributaries to the River Great Ouse, which flows north-south to the east of the Site through the town of St Neots approximately 3.7km east of Site D.

3.2.2 The local landscape is generally more undulating than the Site which is located predominantly in a low-lying area with relatively limited topographic variation. The landform rises to the north of the Site towards Grafham Water, to the west of the Site towards a ridgeline beyond Swineshead, and to the south of the Site towards a high point around the Bedford Aerodrome.

3.2.3 The landscape pattern of the local area is broadly consistent, comprising medium- to large-scale arable farmland interspersed with blocks of woodland,

particularly in the more elevated parts of the landscape to the north of the Site.

3.2.4 The local settlement pattern is dispersed and typically rural in character comprising occasional distinct village settlements. From west to east the principal settlements in closest proximity to the Site are Swineshead, Pertenhall, Keysoe, Keysoe Row, Little Staughton, Great Staughton, Hail Weston, and Duloe. The town of St Neots lies east of the A1 to the east of the Site and is the largest settlement local to the Site. Outside of the settlements there are occasional individual properties and farmsteads including some in close proximity to the Site. The following properties lie 'inset' within the Order Limits, in that they are excluded from the Order Limits but surrounded by the Site:

- Lodge Farm, a residential property with associated equestrian land uses inset within Site B to the north-west of Little Staughton; and
- The Kangaroo, a former public house which is now a residential property and dog kennels inset within Site B at the junction between Little Staughton Road and Staughton Road.

3.2.5 There are several existing solar farms in close proximity to the Site, which are located:

- To the south of Pertenhall (adjacent to East Park Site A);
- At Little Staughton Airfield (1.2km south-west of East Park Site C); and
- At High Wood to the west of Hail Weston (0.1km south of East Park Site D).

3.2.6 The local area is crossed by a network of public rights of way including footpaths, bridleways and byways open to all traffic. There are three long distance recreational trails within 3km of the Site, albeit none of which cross into the Site: the North Bedfordshire Heritage Trail which passes through Riseley and Keysoe Row; the Three Shires Way north of Great Staughton that provides a circular route around Grafham Water; and the Ouse Valley Way which follows the River Great Ouse through St Neots. There are

occasional small areas of public space located around villages and the largest area of accessible natural green space is Swineshead Wood open access land which is located to the north of Swineshead.

Designations

3.2.7 Relevant environmental designations in the vicinity of the Site are shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

3.2.8 Neither the Order Limits nor the surrounding area are covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The closest statutory landscape designation to the Order Limits is the Chilterns National Landscape located approximately 30 km to the south. The Order Limits are also not within any locally designated (non-statutory) landscapes.

3.2.9 There are no statutory nature conservation designations within the Order Limits. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site. Perry Woods SSSI is located circa 1.8 km north of the Order Limits and Grafham Water SSSI is located circa 2.8 km north. The closest 'European site' (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Order Limits, to the north-west.

3.2.10 The following non-statutory nature conservation designations are in close proximity to the Site:

- Kangaroo Meadow County Wildlife Site, which is adjacent to Site B and is recognised for the presence of neutral grassland; and
- Huntingdon Wood County Wildlife Site, which is adjacent to the south side of the grid connection between Site D and the Eaton Socon Substation.

3.2.11 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of the environmental assessment of the Scheme has discovered the site of a Roman Town in Site

C. Due to the national importance of the archaeological finding, the Applicant has been engaging with Historic England on the find since it was identified in January 2024. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to the Secretary of State for Culture, Media and Sport (via Historic England) to designate the area as a Scheduled Monument. The application was accepted, and the archaeology was designated as a scheduled monument in September 2024. The location of this Scheduled Monument is shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

3.2.12 There are no other statutory designated heritage assets within the Order Limits. There are a number of listed buildings located within the vicinity of the Order Limits, in and around the settlements of Pertenhall, Keysoe, Swineshead, Little Staughton, Great Staughton and Duloe. Of particular note this includes the Grade I listed Church of St Peter in Pertenhall; the Grade I listed Church of St Mary the Virgin in Keysoe; the Grade I listed Church of All Saints to the east of Little Staughton; and the Grade I listed Church of St Andrew at Great Staughton. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary.

3.2.13 The Order Limits are not covered by any conservation areas, with the closest being the Great Staughton Conservation Area, located circa 200 m north of East Park Site C; Swineshead Conservation Area, located circa 750 m west of East Park Site A; and Riseley Conservation Area, located circa 1.2 km south-west of East Park Site A.

3.2.14 The Order Limits are located predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 associated with Pertenhall Brook to the west through Site A; with an unnamed watercourse through Site B; and with the River Kym to the north of Site C.

3.2.15 The Order Limits are crossed by a number of existing utilities including high pressure gas mains and overhead electricity lines, the required easements of which would be excluded from the solar development area. Cabling across these areas would be in accordance with all required standards.

3.3 Relevant Planning History

3.3.1 The land within the Order Limits is predominantly agricultural land and therefore the relevant planning history is limited.

3.3.2 A planning history search for the full extent of the Order Limits has been undertaken and is presented in **Appendix A**. Where applicable, commentary has been provided as to how each application relates to the Scheme.

3.3.3 In summary, there are no pending or extant planning consents across the Order Limits that are affected by the Scheme.

3.4 Site Selection

Site Identification

3.4.1 The starting point for any renewable energy generation project is identifying a part of the national grid where there is available grid capacity to connect a renewable energy project.

3.4.2 A search for a Point of Connection (PoC) was undertaken by the Applicant in 2021, which involved analysis of the national grid to identify parts of the network with potential available capacity to connect a 400 MW solar scheme. Following an application to National Grid it was established that the Eaton Socon Substation has the available capacity to connect a 400 MW solar scheme, and that this could be completed within a commercially viable timeframe and cost.

3.4.3 As a starting assumption a 400 MW solar farm could be expected to require between 800 to 1,600 acres of land to deliver, which approximately equates to between 325 and 650 hectares.

3.4.4 The Applicant undertook a site identification exercise to find the most appropriate location for a large-scale solar development capable of utilising the available grid capacity within the Eaton Socon Substation. A 15km area of search around the Eaton Socon Substation was taken as a starting point, with the land in this area of search reviewed against known planning and environmental constraints in accordance with the 'factors influencing site selection' set out in NPS EN-3. This is reported in **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]**.

3.4.5 This concluded by identifying a 'Search Zone' to the north-west of the Eaton Socon Substation that was considered the most suitable location for a large-scale solar development. The recommendation given at the conclusion of the Site Identification Report was that the Applicant should approach landowners in the Search Zone to gauge interest in developing a project.

Land Identification

3.4.6 Following identification of a broad search zone, a second stage of site selection was undertaken as reported in **ES Vol 2 Appendix 3-2: Land Identification Report [EN010141/DR/6.2].** This comprised a review of land within the Search Zone which was offered to the Applicant in order to establish constraints to development of the Scheme and refine the overall landholding to be taken forward.

3.4.7 NPS EN-1 states that: "*Design principles should be established from the outset of the project to guide the development from conception to operation*". Therefore, the land identification stage was guided by a series of 'Early Design Principles'.

3.4.8 The culmination of the second stage of site selection was the identification of a proposed site to be taken forward for the Scheme. The landholding for the proposed site was subsequently increased to account for technical, environmental and commercial constraints as set out in E**S Vol 2 Appendix 3-3: Land Identification Report Addendum [EN010141/DR/6.2]** and in **ES**

Vol 2 Appendix 3-4: Land Identification Report Further Addendum [EN010141/DR/6.2].

3.4.9 By taking the approach set out above and in the Site Identification Report and Land Identification Report, the Applicant has embedded design and a consideration of site context within the site selection process.

3.4.10 A detailed description of the approach taken to site selection is set out in full within **ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]**, supported by the following appendices:

- **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 3-2: Land Identification Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 3-3: Land Identification Report Addendum [EN010141/DR/6.2]**; and
- **ES Vol 2 Appendix 3-4: Land Identification Report Further Addendum [EN010141/DR/6.2]**.

4.0 THE SCHEME

4.1 Overview of the Scheme

4.1.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site BESS on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

4.1.2 The Scheme would allow for the generation and export of 400 MW of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

4.1.3 Subject to the Scheme securing a DCO in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning.

4.1.4 A detailed description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

4.2 Scheme Definition within the DCO

4.2.1 The extent of the development authorised by the draft DCO is set out in Schedule 1 of the **draft DCO [EN010141/DR/3.1]**. This Schedule identifies the principal works and associated development that together comprise the Scheme.

4.2.2 The authorised development includes the construction, operation, maintenance and decommissioning of a ground-mounted solar photovoltaic generating station with an export capacity of over 50 megawatts (MW),

together with battery energy storage, on-site substation, grid connection works, cabling and ancillary infrastructure, operations and maintenance facilities, drainage, temporary construction and decommissioning compounds, landscaping and green infrastructure, access arrangements, an 'agrisolar' research area, and all other associated development.

4.2.3 The extent of the authorised development is defined by the Order limits, within which the different components of the Scheme are located. The Order limits are illustrated on the **Land Plan [EN010141/APP/2.2]** and **Works Plan [EN010141/APP/2.3]**. Together, these plans establish the spatial framework within which the Scheme must be delivered, ensuring the development remains within the boundaries and parameters assessed in the ES.

4.2.4 As drafted, the DCO provides flexibility for the Applicant to refine certain design and construction details at the post-consent stage, within the limits of deviation defined in the DCO and controlled through the Requirements in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. This approach is consistent with the Planning Act 2008 regime and ensures that the authorised development remains deliverable, whilst ensuring that any environmental effects are no greater than those assessed in the ES.

4.3 Key Elements of the Scheme

4.3.1 The principal elements of the Scheme comprise:

- Ground-mounted solar photovoltaic generating station that would include solar photovoltaic modules and support frames, internal access tracks, cabling, inverters, and transformers across East Park Sites A, B, C and D;
- A battery energy storage system (BESS) and co-located on-site substation (known as the East Park Substation) within East Park Site D;
- A 400 kV undergrounded grid connection between the East Park Substation and the Scheme's point of connection with the National Grid at the Eaton Socon Substation. The grid connection follows a corridor between East Park Site D and the Eaton Socon Substation;

- Works to the National Grid Eaton Socon Substation comprising the creation of 400 kV generation bay including circuit breaker, switchgear, metering equipment, cable sealing ends, and associated infrastructure;
- A main site access from the B645 into Site D, along with other new access points with the public highway and sections of access road, including an upgraded access into the west of Site C. A series of temporary and existing access roads will route construction traffic between Sites A, B, C and D while minimising use of public highways and limiting traffic through local villages.
- Creation of 'Agrisolar' research area within Site D facilitating research on the co-location of agricultural production with solar generation in the UK;
- Ancillary infrastructure – which includes fencing, cabling, drainage, access tracks, closed-circuit television (CCTV); and
- Landscaping and green infrastructure comprising extensive habitat creation which includes woodlands, hedgerows, trees, and grasslands alongside new permissive paths.

4.3.2 **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** provides an illustrative layout of the above principal elements of the Scheme.

Associated Development

4.3.3 Further associated development may be required as set out in full within Schedule 1 of the **draft DCO [EN010141/DR/3.1]**, including but not limited to:

- laying down of internal access tracks, temporary footpath diversions, ramps, means of access, carparks, crossing of watercourses and roads;
- improvement, maintenance, repair and use of existing streets, private tracks, public rights of way and access roads;
- sustainable drainage systems including runoff outfalls, general drainage and irrigation infrastructure, systems and improvements or extensions to existing drainage and irrigation systems;

- works for the provision of security and monitoring measures such as CCTV columns, cameras, weather stations, perimeter fencing;
- electrical, gas, water, foul water drainage and telecommunications infrastructure connections, diversions and works to, and works to alter the position of, such services and utilities connections; and
- construction and decommissioning compounds, including site and welfare offices and areas to store materials and equipment.

4.4 Design Development

4.4.1 The approach to the design of the Scheme has taken account of environmental assessment, consultation and engagement activities, technical feasibility and cost considerations. **ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]** and the **Design Approach Document [EN010141/DR/5.6]** set out the framework and process followed for decision-making on design and provide an overview of the project's design evolution and alternative design considerations.

4.4.2 The **Consultation Report [EN010141/DR/5.1]** and **Consultation Report Appendices [EN010141/DR/5.2]** set out the pre-application consultation undertaken by the Applicant and how the design of the Scheme has evolved in response to consultee feedback.

4.5 Design Flexibility and Securing Good Design

4.5.1 National Policy Statements EN-1 and EN-3 recognise that flexibility can be necessary in the preparation and making of a DCO to account for uncertainties in specific project details.

4.5.2 The Planning Inspectorate's Advice Note 9: 'Rochdale Envelope'[39] ('Advice Note 9') provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. The advice note acknowledges that there may be aspects of the Scheme that are not yet fixed prior to the DCO being granted, and therefore, it may be necessary for the EIA to assess likely worst-case

variations to ensure that all reasonably foreseeable likely significant environmental effects of the Scheme are assessed.

4.5.3 As such the application for development consent and EIA are based upon maximum and, where relevant, minimum parameters and defined work areas where the types of development can take place. These parameters, hereafter referred to as 'the Design Parameters' are based on industry knowledge and best practice such that a sufficient degree of flexibility is provided within the DCO. The Design Parameters are described in detail within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

4.5.4 The flexibility afforded by the DCO would be controlled through the **Works Plan [EN010141/DR/2.3]** (which limit the spatial extent of the types of development) and the Design Parameters set out in the **Design Parameters and Principles Statement [EN010141/DR/7.1]**.

4.6 Site Preparation Works

4.6.1 There are a range of preliminary works that are required to enable the main construction works to commence on the various phases of construction set out above. These enabling works include the initial mobilisation and access to the Site, and individual enabling works for specific phases of the development.

4.6.2 Within the **draft DCO [EN010141/DR/3.1]** these works are identified as the "site preparation works" which would not constitute a commencement of the construction phase. The site preparation works would include the following activities:

- environmental surveys, geotechnical surveys, intrusive archaeological surveys and other investigations required in advance of construction;
- receipt and erection of construction plant and equipment;
- above ground site preparation for temporary facilities for the use of contractors;
- diversion and laying of apparatus;

- the provision of temporary means of enclosure and site security for construction;
- the temporary display of site notices or advertisements;
- preliminary site access works; and
- site clearance (including vegetation removal, demolition of existing structures or buildings).

4.6.3 The Applicant has thoroughly evaluated the site preparation works and, following assessments within the EIA process, concluded that the environmental impact of these activities does not necessitate the mitigation outlined in the Requirements set out in Schedule 2 of the **draft DCO [EN010141/DR/3.1]** to be in place before they can proceed.

4.6.4 Notwithstanding the above, the Applicant has identified some Requirements deemed necessary to have been discharged for certain site preparation works to commence and this is accounted for in the drafting of the DCO Requirements. The Applicant has also outlined best practice measures to be adopted when undertaking the site preparation works, aimed at reducing potential adverse impacts on environmental receptors. These measures are detailed in **ES Vol 2 Appendix 2-3: Site Preparation Works [EN010141/DR/6.2]**. Compliance with the measures in this appendix is secured by a Requirement in the **draft DCO [EN010141/DR/3.1]**.

4.7 Construction Phase

Construction Programme and Phasing

4.7.1 The construction phase is expected to last for approximately 30 months, based on experience of constructing other similar-scale installations. Subject to securing development consent in Winter 2026/27, the Scheme is expected to start construction in early 2028 and complete construction by mid-to-late 2030. Initial energisation is likely before 2030 to meet national Clean Power 2030 targets.

4.7.2 It is possible that the construction phase could be slightly shorter or longer than stated, however for the purposes of assessment a 30-month programme has been utilised. The final programme would be dependent on detailed design matters once any DCO Requirements have been appropriately discharged.

4.7.3 The construction of the Scheme is likely to be split into different phases which would be managed such that they are often happening in tandem in order to build out the Scheme in the most efficient way possible.

4.7.4 The Scheme is spread across multiple areas (Site A-D) to accommodate different components of the Scheme efficiently. Splitting the work into several sites allows construction activities to run in parallel, reducing overall programme time and minimising interference between different parts of the project.

4.7.5 A detailed description of the construction activities is provided at **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** and would consist of the following primary stages:

- **Enabling Works (Months 1–3)**: Establishment of main/satellite compounds, access roads, tracks, and drainage crossings;
- **East Park Substation (Months 2–12)**: Roads, foundations, control building, transformers, switchgear, and ancillary works;
- **400 kV Grid Connection (Months 3–10)**: Temporary access, trenching, cable laying, jointing chambers, commissioning, and reinstatement;
- **East Park BESS (Months 7–24)**: Foundations, internal roads, cabling, equipment installation, and testing; and
- **East Park Sites A–D (Months 2–30)**: Fencing, solar PV installation, drainage, inverters, cabling, O&M building, commissioning, and soft landscaping.

4.7.6 An **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]** is submitted with the DCO application. The **oCEMP [EN010141/DR/7.3]** outlines the principles, controls, and measures to be

implemented during construction to reduce potential significant environmental effects from occurring. Where the Scheme relies on mitigation measures in relation to significant construction phase environmental effects from the EIA, these measures have been outlined within the **oCEMP [EN010141/DR/7.3]**. As a Requirement of the **draft DCO [EN010141/DR/3.1]**, a final CEMP would be produced by the selected contractors that would construct the development. The final CEMP would be in substantial accordance with the **oCEMP [EN010141/DR/7.3]** and would need to be approved by the relevant Local Planning Authorities prior to the construction of any phase of the authorised development to which a CEMP is required.

4.7.7 The average number of workers on Site across the construction phase would be 496. During the period of peak construction activity, at month 12, there would be a need for approximately 854 staff on site. The workforce would be distributed across the Site with work happening in parallel across the sub-projects / sites described above.

4.7.8 An indicative workforce resource schedule is presented in **ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2]**.

Construction Access Arrangements and Compound Locations

4.7.9 The main construction compound will be located at Site D near the B645 access and will include offices, welfare facilities, car parking, material storage, and vehicle manoeuvring areas. Satellite compounds will be established at Sites A, B, and C to support the solar construction, providing similar but smaller-scale facilities.

4.7.10 No dedicated compounds are planned along the 400 kV Grid Connection corridor. Instead, temporary laydown areas will be used for materials and trenchless crossings. Utilities for the sites will be supplied through temporary facilities, such as generators, water bowsers, and local wastewater storage, with waste transported off-site.

4.7.11 Site access will primarily be through the B645 into Site D, with most staff and HGV traffic routed via this main entry. Some staff may access Sites A and B directly. The access strategy aims to minimise use of public roads, using temporary access tracks across fields and upgraded or realigned farm tracks to connect the sites while reducing impacts on local communities.

4.7.12 Existing access tracks and agricultural entrances will be used where possible, with sections upgraded or restored to ensure safe vehicle movement. Temporary passing places will be installed along tracks to manage two-way traffic during construction.

4.7.13 Construction access arrangements and construction compounds are described further in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

4.7.14 Traffic movements are expected to average 8 one-way HGV trips per day across the 30-month construction phase, peaking at 30 during the initial enabling works. Staff movements are anticipated to average 248 per day, peaking at 427 in Month 12. Further details of traffic movements are provided within the **ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1]** and the **ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2]**.

4.7.15 The construction phase will require a variety of vehicles, plant, and machinery, including lorries, low loaders, tipper trucks, concrete mixers, cranes, excavators, telehandlers, piling rigs, generators, rollers, cable pullers, horizontal directional drills, and skips. Larger equipment, such as two 200-tonne transformers and a 250-tonne mobile crane, will be needed for the East Park Substation.

4.7.16 An **outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]** is submitted as part of the application to set out the measures the Applicant considers necessary to mitigate transport impacts during the construction phase. The oCTMP sets out the overall approach to how the movement of construction traffic, including Site personnel movements, will be safely managed and provides detail environmental

management practices in respect of construction traffic, including seek to coordinate with cumulative developments. The **oCTMP [EN010141/DR/7.4]** will be developed into a final Construction Traffic Management Plan (CTMP) as a requirement of the **draft DCO [EN010141/DR/3.1]**, and this CTMP will require approval of the Local Highway Authority prior to construction.

Construction Hours of Work

4.7.17 Construction operations would generally be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday, with no construction work on Sundays or Bank Holidays. Construction workers would typically arrive in the hour prior to the start of construction and leave in the hour after construction work ceases. Construction staff would therefore arrive at the Site before 08:00 and depart after 18:00 during weekdays.

4.7.18 There may be instances where operations are required outside the above times e.g. delivery of abnormal loads, fit out of internal equipment within the substations, other quiet non-intrusive works such as electrical testing, commissioning and inspection. In such instances, it would be necessary to agree on a modification to the working hours with the Local Planning Authority, as set out in the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.

Construction Lighting and Security

4.7.19 The use of artificial lighting will be required during the hours of darkness, low levels of natural light or during specific construction tasks to satisfy health and safety requirements of those on-site including construction staff and visitors.

4.7.20 The Site will be secured by temporary fencing (such as Heras fencing) during the construction phase, with overall management of security resting with the Principal Contractor.

4.7.21 The principles of lighting and security measures to be provided during the construction phase are provided in **ES Vol 1 Chapter 2: The Scheme**

[EN010141/DR/6.1]. Measures to control light pollution are documented within the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.

Public Rights of Way

4.7.22 An **outline Public Rights of Way Management Plan [EN010141/DR/7.8]** has been prepared and submitted with the application. Access to all public rights of way will be maintained during construction, with temporary, short-term diversions only where necessary (for example cable trenching). Safety measures include signage, fencing, and banksmen, with diversions typically lasting no more than four weeks and the full path width maintained. Post-consent, the outline plan will be developed into a final plan. The Scheme will be undertaken in line with this, secured via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

Utilities

4.7.23 Several utilities cross the site, including gas, water, electricity, and a decommissioned oil pipeline**.** These are detailed on **ES Vol 3 Figure 2-3: Indicative Crossings Plan [EN010141/DR/6.3]**. Protective Provisions will be implemented during construction, with working methods agreed with utility owners and secured by the **draft DCO [EN010141/DR/3.1]**.

4.7.24 Easements are applied to safeguard assets. The former oil pipeline in Sites A and B will be carefully marked, with no piling or works that could damage it, and appropriate offsets applied to prevent vibration impacts.

4.7.25 These utility safeguards are incorporated into the o**utline Construction Environmental Management Plan [EN010141/DR/7.3]** to ensure protection of all assets during construction.

Areas of Archaeological Constraint

4.7.26 The Applicant has undertaken archaeological investigations during the pre-application phase of the Scheme that have identified areas with buried

archaeological resource within the Order Limits. The Applicant has therefore prepared an **outline Archaeological Mitigation Strategy (oAMS) [EN010141/DR/7.15]** that sets out the location of 'Areas of Archaeological Constraint' within the Order Limits, along with potential archaeological mitigation measures that will be secured in each area.

4.7.27 The measures set out in the **oAMS [EN010141/DR/7.15]** are an essential part of the Scheme, and part of the embedded design and mitigation measures assessed in this ES.

4.7.28 The Areas of Archaeological Constraint are identified on the drawings in **Appendix A** of the **oAMS [EN010141/DR/7.15]**.

Construction Environmental Management

4.7.29 An **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]** has been prepared which outlines the principles, controls, and measures to be implemented during construction to reduce potential significant environmental effects from occurring, including relevant subsidiary plans. Where the Scheme relies on mitigation measures in relation to significant construction phase environmental effects from the EIA, these measures have been outlined within the oCEMP.

4.7.30 Post-consent, this outline plan will be developed into a full plan which must be in substantial accordance with the outline and will require approval by the Local Planning Authorities. The Scheme must be undertaken in accordance with the approved plan. This is secured via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

4.8 Operational Phase

4.8.1 The Scheme comprises a temporary development with an operational phase of up to 40 years. Decommissioning activities would be expected to commence 40 years after final commissioning, and so decommissioning would be expected to start in 2070.

4.8.2 During the operational phase of the Scheme, the routine activities on site would be limited primarily to vegetation and landscape management; maintenance of footpaths, recreational facilities and fencing; equipment maintenance; and servicing, cleaning of solar PV modules, and onsite agricultural management e.g. associated with sheep grazing. There would also be a requirement for replacement of components that fail or reach the end of their lifespan.

4.8.3 An **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** has been prepared which outlines the principles, controls, and measures to be implemented during the operational phase to reduce potential significant environmental effects from occurring, including during any replacement campaigns.

4.8.4 **The outline Landscape and Ecology Management Plan (oLEMP) [EN010141/DR/7.7]** sets out the management prescriptions and target habitat conditions for the various landscape features identified on the *Illustrative Landscape Proposals* in **Appendix A** of the **oLEMP [EN010141/DR/7.7]**. Post-consent, a final plan will be developed in substantial accordance with the oLEMP and approved by local authorities, with compliance secured under the **draft DCO [EN010141/DR/3.1]**.

4.8.5 The oLEMP also sets out monitoring processes to track the establishment of target habitats and implement remedial measures if needed, ensuring that habitats are created and managed to meet the scheme's ecological objectives.

4.8.6 There would be a need to replace components that fail or reach the end of their lifespan. Table 2-35 of **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** identifies that for many of the components, it can be expected that there would be one or more replacements required over the 40-year lifetime of the project. The assessments presented within the ES for the operational phase provide a worst-case scenario of all of the infrastructure on the Site being constructed at once. The replacement of components would be

periodic throughout the lifetime of the scheme and would not involve the intensity of construction required at the outset of the project.

4.8.7 Routine inspections and assessments will be conducted to determine the condition and performance of solar panels, inverters and transformers, battery storage units, and other associated infrastructure. Equipment identified as reaching the end of its functional lifespan or showing reduced operational performance will be scheduled for replacement.

4.8.8 During the operational phase, all existing public rights of way (PRoW) will be maintained on their current alignment, with no diversions or stopping-up of routes. The **outline Public Rights of Way Management Plan [EN010141/DR/7.8]** sets out how PRoW within the Order Limits, as well as any newly created permissive paths, will be managed throughout the lifetime of the Scheme.

4.9 Decommissioning Phase

4.9.1 When the operational phase ends, the Scheme would require decommissioning. Decommissioning is expected to take between 12 and 24 months and would be undertaken in phases.

4.9.2 All solar PV modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing will be removed and recycled or disposed of according to best practice and market conditions. Sub-surface infrastructure deeper than 1 m, such as cable conduits, will generally remain in place to minimise environmental impact. The site will be restored to a condition suitable for its original use after decommissioning.

4.9.3 On decommissioning, the landscaping works undertaken across the Site would remain in place, and the land would be handed back to the landowner. It is very likely that tree and hedgerow planting would be retained, however, as the land would be handed back to the landowners on completion of decommissioning the longer-term retention of the landscaping improvement works cannot be guaranteed. Similarly, following decommissioning the

landowner may or may not retain the permissive footpaths created across the Site.

4.9.4 Any requirements to retain access tracks will be discussed and agreed with the landowners as part of the decommissioning process.

4.9.5 It is likely that the generation bay and associated infrastructure therein at Eaton Socon substation will be left in situ following decommissioning because National Grid will own this infrastructure.

4.9.6 An **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6]** has been prepared which outlines the principles, controls, and measures to be implemented during the operational phase to reduce potential significant environmental effects from occurring. Post-consent, this outline plan will be developed into a full plan by the Applicant, which must be in substantial accordance with the outline and will require approval by the Local Authorities. The Scheme must be operated in accordance with the approved plan. This is secured via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**.

5.0 BENEFITS OF THE SCHEME

5.1 Introduction

5.1.1 NPS EN-1 sets out at paragraph 4.1.5 that:

> *"In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:*
>
> *its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits*
>
> *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy"*

5.1.2 This section of the Planning Statement sets out the benefits of the Scheme, whilst the adverse impacts are set out in Section 7.0.

5.1.3 The benefits are explained under three separate headings as follows:

- Project benefits addressing identified national needs;
- Project benefits addressing identified local needs; and
- Additional project benefits.

5.2 Project Benefits Addressing Identified National Needs

5.2.1 The national need for the Scheme is established within NPS EN-1 and within Section 2.0 of this Planning Statement.

Contribution to Net Zero Targets

5.2.2 As set out in Section 2.3 of this Planning Statement, the Scheme would directly contribute to national decarbonisation and meeting net zero targets (in line with the statutory requirements set out at Section 2.2 of this Planning Statement) through a supply of clean renewable energy, replacing existing fossil fuel generation in the grid. The Scheme is fully aligned with the net zero strategy and can make a valuable contribution towards decarbonising the energy sector before the critical 2030 deadline for a predominantly clean electricity supply.

Contribution to Increased Energy Security

5.2.3 As set out in Section 2.4 of this Planning Statement, the Scheme would directly contribute to the UK's energy security agenda by reducing dependence on imported fossil-fuel for gas-fired power. The inclusion of on-site battery storage means the Scheme will function not just as a generation asset but as a flexible energy hub that helps balance supply and demand locally. By delivering secure, low-cost renewable power, the Scheme will strengthen energy independence and protect consumers and businesses from future energy price shocks.

Contribution to Green Economic Growth

5.2.4 As set out in Section 2.5 of this Planning Statement, the Scheme will help drive wider economic gains associated with decarbonisation, in line with the Government's mission to be a 'Clean Energy Superpower'. The availability of clean, affordable power is increasingly seen as a foundation for competitive economic growth – high energy costs and insecurity can impede industrial investment.

Contribution to Increased Electricity Demand

5.2.5 As set out in Section 2.6 of this Planning Statement, the Scheme will make a meaningful contribution towards meeting the anticipated significant increase

in future electricity demand set out in NESO's FES 2025. FES 2025 outlines a future energy mix dominated by renewables, in which solar PV provides a significant share of energy, complemented by storage to manage variability.

5.3 Project Benefits Addressing Identified Local Needs

5.3.1 The local need for the Scheme is established within Section 2.0 of this Planning Statement.

Local Climate Emergency and Contribution to Net Zero Targets

5.3.2 As set out in Section 2 of this Planning Statement, Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council have each declared a Climate Emergency with differing pledges to contribute to reducing carbon emissions or achieving net zero emissions through to 2050. The Scheme would directly contribute to reducing carbon emissions and supporting these targets. producing enough clean electricity to power approximately 117,000 homes annually and save approximately 1,800,000 tonnes of CO2 equivalent over its lifetime.

Local Green Economic Growth

5.3.3 As set out in Section 2.5 of this Planning Statement, the Scheme will deliver significant benefits for local green economic growth by providing new solar capacity to support local commitments to low-carbon development. The Scheme represents hundreds of millions of pounds of inward investment, generating hundreds of construction jobs, long-term operational roles, and substantial local supply-chain opportunities. By supplying affordable, clean power, the Scheme will enhance energy resilience for businesses and households, attract low-carbon industries to the region, and help underpin the East of England's ambition to become a national clean growth hub with a £220 billion economy by 2035. Its integration of biodiversity enhancements and community benefits further ensures that economic growth is aligned with environmental sustainability, reinforcing the green growth strategies of

Huntingdonshire, Bedford, Cambridgeshire, and the wider Oxford–Cambridge Arc .

5.3.4 The Applicant has prepared an **outline Skills, Supply Chain and Employment Plan [EN010141/DR/7.11]** that provides further detail and commitments in relation to local job opportunities. Once operational, the Scheme will support a number of permanent jobs (or long-term contracted.

5.4 Additional Scheme Benefits

5.4.1 In addition to the substantial aforementioned benefits which are aligned with NPS EN-1 and the '*important and relevant considerations*' set out in Section 2.1 of this Planning Statement, the Scheme will also deliver other additional benefits that arise as a result of the design process.

5.4.2 These additional project benefits align with the aspirations for new energy development outlined by Government within NPS EN-1 and NPS EN-3.

Cultural Heritage and Archaeology

5.4.3 The Scheme aims to increase the ability to understand, appreciate and experience assets and their significance through increased investigation of the affected assets and/or related assets. Based on the results of these works the proposal aims to widen the audience which has access to this information.

5.4.4 The Applicant has prepared an **outline Heritage Enhancement Strategy (oHES) [EN010141/DR/7.16]** which sets out how the Applicant will secure enhancements for the historic environment, separate to the mitigation requirements that are set out within the **oAMS [EN010141/DR/7.15]** and **outline Construction Environmental Management Plan [EN010141/DR/7.3]**.

5.4.5 The key aims and objectives of the oHES are:

- To increase understanding, appreciation and experience of the historic environment within the Site and East of England in general, with particular

reference to the newly discovered small Roman town at Great Staughton Scheduled Monument (Asset 991) and the ladder settlement in the southern part of Site B (Asset 275);

- To increase knowledge of these assets and increase archaeological skills and capacity through community involvement in archaeological survey and fieldwork;
- To increase access to the assets themselves, and to increase access to information about the assets, specifically ensuring access is more inclusive and is available to a diverse audience; and
- To utilise the historic environment of the Site to support health and wellbeing.

5.4.6 The oHES would ensure that a greater understanding of the assets affected by the Scheme would be achieved, and that that knowledge would be disseminated in line with policy and guidance.

5.4.7 The OHES includes for the following actions:

- Community excavation;
- Geophysical survey;
- Public involvement;
- Public engagement via community talks;
- Heritage trail and on-site interpretation;
- Mobile friendly website; and
- Educational packs.

5.4.8 Table 1 below outlines each of the activities proposed in the HEMP and indicates the resultant public benefits in line with the criteria.

Table 1: Heritage Enhancement Strategy activities and resultant public benefits

HEMP Activity	Resulting Public Benefit
Results of proposed archaeological fieldwork and geophysical surveys as	Freely accessible information; sharing of knowledge gained; increased accrued

HEMP Activity	Resulting Public Benefit
shared with the Historic Environment Record, OASIS, etc.	value allowing synthesis of knowledge and updated research aims.
Conducting talks disseminating results of archaeological investigation to local parishes/ regional history societies / national bodies (CIfA, CBA etc.)	Freely accessible information; sharing of knowledge gained; increased accrued value allowing synthesis of knowledge and updated research aims.
Volunteer engagement/recruitment through involvement of volunteers in the archaeological fieldwork / geophysical survey	Wider range of people involved in heritage; new skills learned; skill enhancement; increased understanding of the historic environment; increased well-being.
Locally based and online workshops covering a wide range of topics including, but not limited to, desk-based research with documents, aerial photographs, landscape study, LiDAR and other remote sensing data, project management; post-excavation, interpretation.	New skills; increased knowledge; increased understanding and awareness of historic environment; increased well-being
Events: Open days; site tours; guided walks, heritage trails, living history, archaeology/heritage events.	Increased understanding and awareness of historic environment; increased well-being.
Increased site access via on-site interpretation enhanced by Mobile Friendly Website	Increased community pride, sense of place; improved health and well-being for users
Educational Packs	Increased understanding and awareness of historic environment; contributing to STEM learning
Mobile Friendly Website allowing remote site access for online audiences	Sharing of new knowledge gained; positive promotion of site/community/region to wider audience; increased awareness and understanding of the historic environment; allowing of inclusive access to the Site and shared heritage

5.4.9 The **oHES [EN010141/DR/7.16]** activities would contribute to the Scheme meeting public benefit outcomes as "*sharing archaeological discoveries*

creates a positive impact with local communities; helps connect the new development with a local community; [and] *creates an opportunity for a different narrative in terms of impact of development"*, as set out in 'Delivery of Public Benefit and Social Value & Guidance for Archaeology in the Planning Process'.[40]

5.4.10 The resultant public benefits would increase not only understanding of the assets, but would increase appreciation and experience of them through increased access and interpretation; thus enhancing an understanding, appreciation and experience of the local historic environment and adding further public benefit to the development.

Nature Conservation and Biodiversity

5.4.11 As a result of the embedded design proposals and approach to delivering ecological mitigation and new green infrastructure, the Scheme would deliver significant benefits for nature conservation, as identified by **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**. The Scheme will result in a significant beneficial effect on priority habitats, due to extensive creation of more than 17km of native species hedgerow as part of the landscape proposals. Throughout operation, the Scheme will also result in a significant beneficial effect on other breeding birds and foraging and commuting bats due to the provision of high-quality habitats as part of the landscape proposals.

5.4.12 Biodiversity Net Gain (BNG) is not yet a statutory requirement for NSIPs, but Government has strongly indicated that it intends to make it a statutory requirement from May 2026. On the basis that BNG would become mandatory during the examination phase of the Scheme, the Applicant has produced a **BNG Report [EN010141/DR/7.17]** that considers land take, habitat creation and biodiversity enhancements to accompany the Scheme. The BNG Report **[EN010141/DR/7.17]** provides an assessment undertaken utilising DEFRA's Statutory Biodiversity Metric Calculator to provide evidence of an achievable on-site gain in biodiversity units.

5.4.13 The Applicant is committed to maximising BNG as far as practicable (as per Design Principle 4.1 secured by the **Design Parameters and Principles Statement [EN010141/DR/7.1])**, and in this regard, the Applicant is electing to claim and commit to a considerable future BNG of:

- 70% net gain in area-based habitat units;
- 30% net gain in hedgerow units; and
- 5% in watercourse units.

5.4.14 This level of net gain both quantitatively, and qualitatively (in what it will deliver) is a significant benefit of the Scheme.

Research and Innovation

5.4.15 The Applicant has partnered with Rothamsted Research ('Rothamsted') to undertake scientific research on co-locating agricultural production with solar generation in the UK.

5.4.16 To enable this research, the Applicant has identified an 'Agrisolar Research Area' within East Park Site D where Rothamsted can define and undertake research projects that explore different arrangements of solar panels, at different heights, or at different densities (as set out in the design parameters for Work No. 10 in the **Design Parameters and Principles Document [EN010141/DR/7.1]**.

5.4.17 The outcome of the research with Rothamsted will be made publicly available to guide the future design and management of solar installations across the UK.

Natural Flood Management

5.4.18 As set out under Design Principle 5.3 within Section 5.6 of the **Design Approach Document [EN010141/DR/5.6]**, the Scheme has the potential to reduce surface water run-off during winter months through natural flood management measures.

5.4.19 Under arable cultivation, the Site is typically subject to seasonal ploughing, crop rotation, and periods of bare soil, particularly post-harvest and during early sowing. These conditions lead to compaction, reduced infiltration rates, and increased vulnerability to surface water runoff and erosion. By contrast, the Scheme will introduce a species-diverse grassland sward that will remain in place year-round. This groundcover will deliver a range of hydrological benefits. The structure of the grassland including the dense root network and surface thatch acts to intercept rainfall, slow overland flow, and improve soil porosity, thereby enhancing infiltration and reducing runoff volumes.

5.4.20 Complementing the grassland are new and retained linear and structural landscape features, including native hedgerow planting, woodland blocks, and enhanced field margins. These green infrastructure elements provide additional surface roughness, intercept overland flow, and act as natural drainage buffers. Hedgerows, in particular, slow lateral movement of water across the Site and help to trap sediment during periods of heavy rainfall. Woodland planting on sloping ground or at strategic low points further contributes to infiltration, shading, and long-term soil stability.

5.4.21 The Applicant has prepared on **outline Surface Water Management Plan [EN010141/DR/7.13]** that provides greater detail about how surface water will be managed across the Site during the construction and operational phases of the Scheme.

Access

5.4.22 Permissive paths have been proposed to create additional opportunities for recreational access. The **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** describes how the public rights of way within the Order Limits, and newly created permissive paths, would be managed over the lifetime of the Scheme.

Education

5.4.23 The Scheme includes enhancement measures set out in the **outline Heritage Enhancement Strategy [EN010141/DR/7.16]** and the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** such as the provision of educational information boards. These features will allow people to learn about the Site's history, ecology, and the solar energy project, thereby enriching the recreational and educational value of the area.

5.5 Community Benefit Fund

5.5.1 It is noted that the Applicant has committed to providing a Community Benefit Fund of £400 per MW per year. This is expected to amount to approximately £6.4 million, over the 40 year life of the solar farm.

5.5.2 It's anticipated that the Community Benefit Fund will be delivered in partnership with an independent third-party organisation that has expertise in the management of community funds.

5.5.3 The Applicant recognises that whilst the Community Benefit Fund will provide local benefits, it cannot and should not be taken into account within the planning balance. Accordingly, it is not included in the Summary of Project Benefits below, or in Section 8.0 where the Planning Balance is considered.

5.6 Summary of Public Benefits

5.6.1 In summary, the Scheme will deliver substantial public benefits meeting national and local needs, as follows:

- Contribution to achieving statutory net zero targets by reducing carbon emissions and addressing the global challenge of climate change;
- Contribution to increasing energy security;
- Contribution to delivering on the national green economic growth agenda and making the UK a 'Clean Energy Superpower';
- Contribution to increasing electricity generation to meet future demand and ensure the 'lights stay on';

- Contribution to achieving carbon neutrality within the local authority areas;
- Contribution to local economic security through investment in the green economy and job creation;
- Contribution to a greater understanding of the historic environment;
- Delivering nature conservation benefits and a significant biodiversity net gain;
- Contribution to research and innovation on integrating agriculture and solar generation through the partnership with Rothamsted and creation of an Agrisolar Research Area;
- Delivering enhanced access and recreation opportunities across the Site; and
- Delivering educational benefits through the provision of visitor amenity features.

6.0 LEGISLATION AND POLICY FRAMEWORK

6.1 Introduction

6.1.1 This section outlines the legislative framework and the planning policy context for the Scheme. It provides an overview of the relevant legislation, energy National Policy Statements (NPSs), the National Planning Policy Framework, local policy documents, guidance and other documents that the Secretary of State may consider to be important and relevant in their decision making.

6.2 Legislation

Planning Act 2008

6.2.1 The Scheme is defined as a nationally significant infrastructure project (NSIP) under Sections 14(1)(a) and 15(2) of the Planning Act 2008 (the 'PA 2008') as an onshore generating station in England exceeding 50 MW.

6.2.2 The PA 2008 provides the legislative basis and defines the application process under which consent for NSIPs is sought.

6.2.3 The PA 2008 provides that the Secretary of State is responsible for determining the application for development consent, with the power to appoint Planning Inspectors from the Planning Inspectorate to manage and examine the application. In its role, the Planning Inspectorate will examine the application for the Scheme and make a recommendation to the Secretary of State who will then decide whether to grant a DCO.

6.2.4 A DCO, if granted, has the effect of providing consent for development, in addition to a range of other consents and authorisations, where specified, as well as removing the need for some consents (such as planning permission). Details of other consents and licences required to construct and operate the Scheme are set out in the **Other Consents and Licences Statement [EN010141/DR/5.5]**.

6.2.5 Section 115 of the PA 2008 also states that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right but is associated with the NSIP applied for. This may be development that supports the construction, operation or decommissioning of the NSIP; which helps to address the impacts of the NSIP; or is of a type normally brought forward with the NSIP.

6.2.6 Section 104(2) of the PA 2008 provides that the Secretary of State must have regard to the following in deciding an application for development consent:

- Any relevant national policy statement (Section 104(2)(a) of the PA 2008);
- The appropriate marine policy documents (if any) determined in accordance with Section 59 of the Marine and Coastal Access Act 2009 (Section 104(2)(aa) of the PA 2008);
- Any Local Impact Report (Section 104(2)(b) of the PA 2008);
- Any matters prescribed (Section 104(2)(c) of the PA 2008); and
- Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision (Section 104(2)(d) of the PA 2008).

6.2.7 Solar photovoltaic generation is covered by the NPS for Renewable Energy Infrastructure (EN-3[41]), with energy storage recognised as associated infrastructure. Other NPS's of relevance to the Scheme comprise:

- Overarching National Policy Statement for Energy (EN-1); and
- National Policy Statement for Electricity Networks Infrastructure (EN-5) in light of the grid connection.

6.2.8 Bedford Borough Council (BBC), Huntingdonshire District Council (HDC) and Cambridgeshire County Council (CCC) as the host authorities will have the opportunity to prepare a Local Impact Report (LIR) following submission of the application for development consent. The LIR will provide the host authorities' opinion of the likely impact of the Scheme on their respective area, and will be considered by the Secretary of State in determining the DCO.

6.2.9 The Infrastructure Planning (Decisions) Regulations 2010 are a prescribed relevant matter, and these regulations are considered under the sub-heading below.

Infrastructure Planning (Decisions) Regulations 2010

6.2.10 The Infrastructure Planning (Decisions) Regulations 2010 (as amended) are a prescribed relevant matter under the PA 2008. Regulation 3 on heritage assets and Regulation 7 concerning biological diversity are relevant to the Scheme. Regulation 3 requires that when deciding an application which affects a listed building or scheduled monument or its setting, the Secretary of State must have regard to the desirability of preserving the asset or its setting. Regulation 7 requires that when deciding an application for development consent the Secretary of State must have regard to the United Nations Environmental Programme Convention on Biological Diversity 1992.

6.2.11 The Scheme has had appropriate regard to preserving heritage assets and their setting as set out in **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]**. Regard has been had to biodiversity conservation and enhancement (and consequently the provisions of the United Nations Environmental Programme Convention on Biological Diversity 1992) in **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**. The conclusions in respect of the historic environment are set out in Section 6.12, and in respect of nature conservation are set out in Section 7.12 of the respective Chapters.

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

6.2.12 The Scheme is ‘EIA development’ as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), requiring an EIA. An ES has been provided with the application for development consent (as required by Regulation 5(2)(a) of the

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('APFP Regulations').

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

6.2.13 The PA 2008 and Regulations 5, 6 and 7 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations 2009') set out requirements for the documents and information that must accompany an application for development consent. This application has been prepared in accordance with the requirements of the APFP Regulations 2009.

6.3 National Policy Statements

6.3.1 Section 104(2) of the PA 2008 sets out that the primary policy considerations for NSIPs include any relevant NPS. The NPSs set out policy for nationally significant development in a particular sector and form the primary considerations for the Secretary of State's decision making on applications for NSIPs.

6.3.2 As set out above, the NPSs relevant to this application are NPS EN-1, NPS EN-3 and NPS EN-5. NPS EN-1 and NPS EN-3 include policy specifically with respect to solar development, while NPS EN-5 covers policy relevant to the grid connection infrastructure.

6.3.3 The Department for Energy Security and Net Zero published draft updates to EN-1, EN-3 and EN-5 on the 24th of April 2025. One of the most substantial changes relates to the integration of the Clean Power 2030 Action Plan into the NPSs. In this regard, the draft update highlights the essential role that renewable energy NSIPs have in achieving the target of producing at least 95% of Great Britain's generation from clean sources of power by 2030 and is therefore consistent with the need case set out above. In relation to solar energy the draft updates do not contain any material changes which affect the approach to the environmental assessments presented in this ES. As such

the topic chapters and the planning appraisal set out in section 7 of this document, focus on the currently adopted NPSs.

Overarching National Policy Statement for Energy (EN-1)

6.3.4 NPS EN-1 sets out assessment principles and generic impacts to provide a framework for consideration of all types of energy NSIP development. EN-1 also sets out the critical national priority for the provision of nationally significant low carbon infrastructure.

6.3.5 Further consideration of NPS EN-1 policies and the Scheme's compliance with them is provided in section 7 below and the **Policy Compliance Document [EN010141/DR/5.4]**.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

6.3.6 EN-3 is a technology-specific NPS, focusing on renewable energy generation projects, including solar development. Section 2.10 of EN-3 sets out the considerations for the Secretary of State's decision making specifically for solar PV development proposals.

6.3.7 Further consideration of NPS EN-1 policies and the Scheme's compliance with them is provided in section 7 below and the **Policy Compliance Document [EN010141/DR/5.4]**.

National Policy Statement for Electricity Networks Infrastructure (EN-5)

6.3.8 NPS EN-5 is the primary basis for decisions on NSIP applications for electricity networks infrastructure. EN-5 is relevant to the Scheme due to the inclusion of electricity network infrastructure within the project.

6.3.9 NPS EN-5 sets out assessment principles specific to electricity network infrastructure, in addition to the principles detailed in NPS EN-1. These are

considered further within Section 7 below and the **Policy Compliance Document [EN010141/DR/5.4].**

6.4 Important and Relevant Considerations

Introduction

6.4.1 Other national and local policy may also be considered 'important and relevant' to the decision-making process by the Secretary of State.

6.4.2 It is considered likely that the Secretary of State may consider the National Planning Policy Framework (NPPF)[42], or parts of it, the Local Plans of Bedford Borough, Cambridgeshire County and Huntingdonshire District Councils and relevant Neighbourhood Plans as 'important and relevant' in accordance with Section 104(2)(d) of the PA 2008. The following sections consider the national and local policy context that are likely considered of relevance.

National Planning Policy Framework

6.4.3 The NPPF was updated in 2024 and sets out the Government's planning policies for England and how they are expected be applied in the determination of planning applications under the Town and Country Planning Act 1990 (TCPA 1990).

6.4.4 The Applicant notes that the NPPF (December 2024) has been updated subsequent to the designation of the NPS (January 2024), and that therefore the NPS does not necessarily take account of updated Government policy within the NPPF.

6.4.5 The headline changes made to the NPPF focus on driving housing supply and delivery, including increased housing opportunities within the Green Belt. It also places additional emphasis on the delivery of public infrastructure, brownfield development, wider support for renewable and low carbon energy and on the delivery of more modern forms of commercial development.

6.4.6 It inserts a specific reference to the aim of transition to net zero by 2050, adding in the specific time frame which was previously missing. Whilst areas for renewables can be identified in development plans, commercial renewable schemes can be provided for elsewhere provided they adhere to the criteria used in relevant policies for identifying the renewable development areas.

6.4.7 Paragraph 5 of the NPPF confirms that it does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision-making framework set out in the PA 2008 and relevant NPSs, as well as any other matters that are relevant. On this basis the NPPF is considered important and relevant where policies are applicable to the Scheme, but of less relevance to the Secretary of State's decision than the NPSs (described at Section 6.3 of this Planning Statement).

6.4.8 National Planning Practice Guidance provides more detailed interpretation on a range of topics to assist with implementation of NPPF policies. Key sections include 'Renewable and low carbon energy' (last updated 14 August 2023) and 'Climate Change' (last updated 15 March 2019).

Local Planning Policy

6.4.9 The local planning policy context is considered important and relevant to the decision-making process and provides local detail, understanding and context to the Scheme. The Scheme is located within the administrative areas of Bedford Borough Council, which is a unitary authority, and Huntingdonshire District Council, which is a two-tier authority with Cambridgeshire County Council.

Adopted Local Development Plan Documents

6.4.10 The adopted local development plan documents relevant to the Scheme comprise the following:

- Bedford Borough Local Plan 2030[43];
- Bedford Allocations and Designations Local Plan[44];

- Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies[45];
- Saved Policies of the Bedford Borough Council Local Plan 2002[46];
- Huntingdonshire Local Plan to 2036[47];
- Cambridgeshire and Peterborough Minerals and Waste Local Plan[48]; and
- Great Staughton Neighbourhood Plan 2021 to 2036[49].

6.4.11 Consideration of the relevant policies of the Development Plan and the Scheme's compliance with them is provided in the **Policy Compliance Document [EN010141/DR/5.4].**

Guidance

6.4.1 The Government has published guidance (thorough online 'advice pages') about national infrastructure planning[50], several of which are considered to be particularly relevant to the Scheme. The guidance pages of most relevance are:

- Advice on Good Design
- Advice on Cumulative Effects Assessment
- Advice on Habitats Regulations Assessments
- Technical Advice Page for Scoping Solar Development
- Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope

Other Documents

6.4.2 There are other national legislation and policy documents relating to renewable energy and climate change. Some of these are discussed in more detail within the Statement of Need provided at Section 2 of this Planning Statement, and include the following:

- Climate Change Act 2008 (2050 Target Amendment) Order 2019 (2019);
- Seventh Carbon Budget 2038-2042 (2025);
- Planning and Infrastructure Bill (2025);

- Paris Agreement (2015);
- British Energy Security Strategy (2022);
- Powering Up Britain (2023);
- Powering Up Britain: Energy Security Plan (2023);
- Powering Up Britain: Net Zero Growth Plan (2023);
- Climate Change Committee 2024 Progress Report to Parliament (2024);
- Accelerating to Net Zero: responding to the CCC progress report and delivering the Clean Energy Superpower Mission (2024);
- Mission Zero: Independent Review of Net Zero (2022);
- Future Energy Scenarios 2024 (2024);
- Clean Power 2030 Action Plan (2024);
- Clean Power 2030 Action Plan: Connections Reform Annex (2024);
- UK's 2030 Nationally Determined Contribution (2020);
- UK's 2035 Nationally Determined Contribution (2025);
- The Energy Act (2023);
- The Environment Act (2021);
- Net Zero: Opportunities for the Power Sector (2020)[51];
- Great British Energy Act (2025).

7.0 PLANNING APPRAISAL

7.1 Introduction

7.1.1 This section sets out the Scheme's compliance with the national and local policy documents set out in Section 6.0 of this Planning Statement.

7.1.2 This planning appraisal should be read alongside the separate **Policy Compliance Document [EN010141/DR/5.4]** which provides a comprehensive analysis of each relevant paragraph of NPS EN-1, NPS EN-3 and NPS EN-5, as well as all applicable local and neighbourhood plan policies.

7.2 Good Design for Energy Infrastructure

Planning Policy Context

7.2.1 Overarching policy considerations in relation to good design are set out within Section 4.7 of NPS EN-1.

7.2.2 Paragraph 4.7.2 of NPS EN-1 explains that applying good design should produce infrastructure that is sustainable and sensitive to its context – for example, by taking into account local landscape character and heritage, using natural resources efficiently, and achieving a high standard of appearance as far as practicable. NPS EN-1 acknowledges that the nature of large energy projects may limit the extent to which they can enhance the beauty of an area, but it still encourages efforts to improve design quality. Paragraph 4.7.3 of NPS EN-1 notes that good design is a means to meet many policy objectives in the NPS – for instance, careful siting and use of appropriate technology can mitigate adverse impacts.

7.2.3 Paragraph 4.7.7 of NPS EN-1 requires applicants to document their design evolution. The application should explain how the design process was conducted and how the design evolved, including the alternatives considered and the reasons for selecting the preferred approach.

7.2.4 The Secretary of State should be satisfied that a project's design is sustainable as well as "attractive, durable, and adaptable" to the extent possible within the required technical and regulatory constraints (paragraph 4.7.10 of NPS EN-1). Applicants should balance both functional requirements and aesthetic aspects of design in line with paragraph 4.7.11 of NPS EN-1.

7.2.5 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS encourages applicants to consider grid connection early in the design process, choosing locations with available network capacity nearby in order to minimise the length of new grid infrastructure needed, reduce costs and environmental disruption, and make best use of existing electricity networks (paragraph 2.10.25). Furthermore, while land type is not the sole determinant of a site's suitability, paragraph 2.10.29 states that, where feasible, solar PV proposals should utilise previously developed, brownfield, or lower-quality land in preference to high quality agricultural land. These considerations show that good design for solar infrastructure begins with prudent site selection and layout, balancing energy generation needs with environmental and land-use constraints.

7.2.6 Paragraphs 2.10.70-71 of NPS EN-3 recognise the need for flexibility in design and guides applicants to set out the parameters for development as part of their application.

7.2.7 The above considerations from NPS EN-3 in relation to factors influencing site selection and flexibility in design are mirrored within NPS EN-5 for electricity networks infrastructure, as set out in paragraphs 2.2.1 to 2.2.8 of EN-5.

7.2.8 Paragraph 2.4.3 of EN-5 sets out that electricity networks infrastructure must in the first instance be safe and secure, and that an applicant's ability to influence the aesthetic appearance of infrastructure may be limited by the functional design constraints of safety and security.

Applicant's Design Approach

7.2.9 The Applicant has prepared a **Design Approach Document (DAD) [EN010141/DR/5.6]** which sets out the design process that has been followed from the inception of the project, and how the Planning Inspectorate's Advice on Good Design has been followed.

7.2.10 The DAD explains how the design of the Scheme has evolved from project inception through to submission of this application for development consent. The DAD sets out the project vision and design principles, the way the design has evolved, and how good design will be secured post-consent.

7.2.11 The DAD is structured around the Planning Inspectorate's four-stage good design process to present a transparent, end-to-end narrative from initial project brief and objectives through to design delivery mechanisms. This structure shows how the Applicant tested options through consultation, research, and assessment.

7.2.12 The design process has been led by competent design experts in consultation with the local community, local project stakeholders and statutory consultees to deliver on this design vision. Design decisions have been made in line with a series of project design principles that were prepared based on guidance set out by the Planning Inspectorate and the National Infrastructure Commission.

7.2.13 At each stage of the design process, the Applicant has made decisions on design outcomes based on inputs from the project team that have been informed by environmental surveys and assessments, engineering and technical requirements, landowner and legal requirements, and commercial viability. In addition, the Applicant has engaged positively with the local communities, stakeholders, and statutory consultees to gather feedback and evolve the design. Key design outcomes at each stage of the design process have been summarised within this Design Approach Document.

7.2.14 Finally, the DAD sets out how good design is secured. It explains how the **draft DCO [EN010141/DR/3.1]** uses Requirements and a suite of control documents to guide detailed design, construction, operation and decommissioning, while allowing appropriate technological flexibility. It also confirms how ongoing engagement will inform delivery and management over the project lifecycle.

7.2.15 The outcome of the design process is a Scheme that represents 'Good Design' and meets the definition and objective set out by the Applicant from the outset. The Scheme also meets the vision for the project, as a commercially viable and deliverable solar development that will make a significant contribution towards national renewable energy targets, whilst being sensitive to its surrounding environment and delivering multiple environmental and social benefits.

7.2.16 The design of the Scheme is secured as set out in Section 6.0 of the **Design Approach Document [EN010141/DR/5.6]**.

7.2.17 The Scheme has been further appraised against national and local policies relevant to design within the **Policy Compliance Document [EN010141/DR/5.6]**.

7.3 Critical National Priority Infrastructure

7.3.1 The designation in January 2024 of the updated Overarching National Policy Statement for Energy EN-1 identified that the Government has concluded there is a 'Critical National Priority' (CNP) for the provision of nationally significant low carbon infrastructure such as the Scheme.

7.3.2 Section 4.2 of NPS EN-1 sets out how applications for 'CNP Infrastructure' will be considered, with the most relevant paragraphs copied below.

7.3.3 Paragraph 4.2.7 and 4.2.8 state that:

> *"The 'CNP' policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of*

energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State. [4.2.7]

During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application." [4.2.8]

7.3.4 Paragraph 4.2.11 states that:

"Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated."

7.3.5 Paragraph 4.2.12 states that:

"Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered."

7.3.6 Paragraph 4.2.14 states that:

"The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions set out below apply"

7.3.7 The CNP policy 'test' is then set out at paragraph 4.2.15:

"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk."

7.3.8 Paragraph 4.2.16 and 4.2.17 of NPS EN-1 confirm that any proposed development which meets the definition of CNP Infrastructure set out by the above test will be taken 'as a starting point' as having met any other tests set out within the NPS, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.

7.3.9 The Applicant has followed the mitigation hierarchy to avoid > reduce > mitigate > compensate impacts and effects as part of the EIA process. The approach taken is set out within the **Environmental Statement [EN010141/DR/6.1 / 6.2 / 6.3]**, but in summary, a sequential approach has been applied consistently across all environmental topics.

7.3.10 Avoidance of significant impacts was the first priority; the site selection and design were guided by environmental constraints to steer development away from less appropriate locations wherever possible, as 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]**. Subsequently, avoidance measures included, for example, removing the newly discovered Roman town in Site C from the permanent developable area, and siting infrastructure on land with the lowest flood risk on site.

7.3.11 In cases where potential effects could not be entirely avoided, the Scheme incorporates measures to minimise or reduce their magnitude. The layout respects existing field boundaries and sightlines, maintaining generous buffers around public footpaths and important habitats. Existing hedgerows are retained and reinforced with new native planting to screen views, and structures employ low profiles and non-reflective finishes.

7.3.12 After exhausting practicable avoidance and reduction measures, a suite of additional mitigation actions are proposed to further address residual effects in each topic area. These include the extensive landscaping schemes to soften views of the solar arrays, sustainable drainage features to manage runoff and maintain natural water flow, and pre-emptive archaeological mitigation to preserve, record and protect heritage remains. Finally, enhancement measures are proposed such as interpretive information and new permissive footpaths to provide improved public access, recreation and education opportunities around the Site.

7.3.13 Through this clear application of the mitigation hierarchy, applied throughout the environmental assessments, the Applicant as demonstrated a rigorous approach to reducing environmental harm at source. All reasonable measures have been taken to prevent or reduce adverse effects; this ensures the Scheme's residual effects are as low as reasonably practicable.

7.3.14 Nonetheless, there remain a small amount of significant adverse residual effects as a result of the Scheme. These residual adverse effects are set out

in **ES Vol 1 Chapter 18: Summary of Environmental Effects [EN010141/DR/6.1]** and relate to landscape and visual effects, a single non-designated heritage asset, and Grade 2 agricultural land.

7.3.15 The CNP policy test applies to these significant residual adverse effects, and is discussed further in the relevant subsequent sub-sections of this planning appraisal.

7.4 Landscape and Visual

7.4.1 In reading this part of the Planning Appraisal, it should be noted that a separate appraisal of Glint and Glare impacts is provided in Section 7.23.

Planning Policy Context

7.4.2 Overarching Landscape and Visual policy considerations are set out within Section 5.10 of NPS EN-1. The NPS acknowledges at paragraph 5.10.13 that major energy projects are "likely to have visual effects for many receptors around proposed sites" and directs the Secretary of State at paragraph 5.10.14 to "judge whether the visual effects on sensitive receptors… outweigh the benefits of the project". It requires (paragraph 5.10.37) projects to be designed and sited carefully (taking account of relevant constraints), with appropriate mitigation to minimise harm to the landscape.

7.4.3 NPS EN-1 advises at paragraph 5.10.16 that the Applicant should carry out a Landscape and Visual Impact Assessment (LVIA) and report it within the ES, and that the LVIA should reference relevant landscape character assessments and local landscape policies (paragraph 5.10.17). The LVIA should also include the potential impact on views and visual amenity (paragraph 5.10.21).

7.4.4 NPS EN-1 guides the Secretary of State to consider whether the adverse impacts of the project are temporary or can be reversed during a reasonable timeframe through mitigation or at decommissioning (paragraph 5.10.36).

7.4.5 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS requires applicants to mitigate landscape and visual impacts wherever possible – for example by screening with native hedgerows, trees or woodlands (paragraph 2.10.131).

7.4.6 Paragraph 2.10.97 of NPS EN-3 states that "*visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints*".

7.4.7 In Huntingdonshire, Policies LP11 and LP12 expect proposals to respond positively to landscape character, integrate with routes and spaces, and achieve high-quality, durable landscaping. Policy LP3 seeks protection and enhancement of green infrastructure and connectivity. Policy LP31 requires assessment and mitigation of impacts on trees and hedgerows. Policy LP35 supports renewables where adverse impacts, including landscape and visual, are mitigated and weighed against public benefits.

7.4.8 In the Bedford Borough Local Plan, Policies 28S and 29 call for high-quality design that enhances landscape. Policy 30 requires careful attention to scale, massing, and materials. Policy 37 requires protection and enhancement of key landscape features and sensitivities. Policy 57 on renewable energy supports renewable energy proposals where the impacts have been satisfactorily addressed, including landscape and visual effects.

7.4.9 The Great Staughton Neighbourhood Plan also seeks positive responses to local landscape characteristics and mitigation of landscape/visual impacts.

Assessment Conclusions

7.4.10 **ES Vol 1 Chapter 5: Landscape and Visual** ('the LVIA') **[EN010141/DR/6.1]** sets out the Applicant's full assessment of the likely significant landscape and visual effects as a result of the Scheme. This section of the Planning Statement contains only a summary of the likely impacts and effects.

Approach

7.4.11 The LVIA follows best practice guidance set out in the Guidelines for Landscape and Visual Impact Assessment and assesses impacts at construction, operation and decommissioning. The assessment of the operational phase is undertaken for the winter of year 0 and the summer of year 10, to account for mitigation that is embedded into the scheme design.

7.4.12 The baseline of the LVIA considers published local landscape character assessments, alongside 83 representative viewpoints covering public rights of way, local settlements, heritage assets, and roads.

7.4.13 Visualisations have been prepared to illustrate the Scheme in year 0 and year 10 from a number of viewpoints, and these are presented within **ES Volume 3 Figures [EN010141/DR/6.3]**.

7.4.14 The Applicant has prepared **ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2]** to assess the potential for significant amenity impacts on views for local residents.

Design and Mitigation Measures

7.4.15 The Scheme has followed the mitigation hierarchy to prevent landscape and visual harm where possible, with mitigation measures set out within Section 5.7 of **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]**.

7.4.16 The **Design Approach Document (DAD) [EN010141/DR/5.6]** explains how the design of the Scheme has evolved from project inception through to submission of this application for development consent. The DAD sets out the project vision and design principles, the way the design has evolved, and how good design will be secured post-consent.

7.4.17 The design process has been led by competent design experts in consultation with the local community, local project stakeholders and statutory consultees to deliver on a design vision. Design decisions have been made in line with a

series of project design principles that were prepared based on guidance set out by the Planning Inspectorate and the National Infrastructure Commission.

7.4.18 A consideration of alternative sites was undertaken from the outset of the Scheme through the site selection process which is considered part of the embedded mitigation as a first step in avoiding significant landscape and visual effects. The site selection process followed two broad stages:

- The first stage, set out in **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]** identified a 'Search Zone' for the most appropriate location for a large-scale solar NSIP capable of utilising the available grid capacity within the Eaton Socon Substation. This stage included avoiding any nationally or locally designated landscapes.
- The second stage, set out in **ES Vol 2 Appendix 3-2: Land Identification Report [EN010141/DR/6.2]** followed on from the first stage and comprised a review of the land offered to the Applicant to establish constraints to development of the Scheme and refine the overall landholding to be taken forward. This second stage considered Early Design Principles as key design guidelines used to determine the Site boundaries, including in relation to landscape and visual impact.

7.4.19 The approach to site selection ensured that whilst the location of the Site was chosen based on a balance of multiple technical and environmental factors, the boundaries of the Site and selection of land parcels was guided in part by design principles to avoid and reduce landscape and visual impacts where practicable.

7.4.20 At a site-scale, the Scheme is set back from areas of higher ground to avoid breaking skylines and to retain views over the Scheme across the wider landscape. The Scheme's fencelines are set back from Public Rights of Way (PRoWs), with wide 'green lanes' provided as shown on **ES Vol 3 Illustrative Environmental Masterplan [EN010141/DR/6.3]**. From visually sensitive areas, planting is arranged to maintain intermittent long views rather than enclosing paths. New native hedgerows with hedgerow trees are used to

integrate and screen infrastructure, restore field boundaries and connect habitats. Structures, including solar panels and ancillary buildings, have been designed with low profiles, anti-reflective coatings, and neutral finishes.

7.4.21 Lastly, compensation and enhancement measures have been introduced to offset residual impacts. New permissive paths will improve recreational access. Educational features, such as viewing areas and informational boards, alongside ecological enhancements like woodland copses, hedgerows and species-diverse grasslands will enrich the visual and ecological diversity of the landscape. Biodiversity gains and the temporary, reversible nature of the development ensure the Site's ecological and landscape value will ultimately be enhanced, balancing initial adverse effects with long-term benefits.

7.4.22 Mitigation for landscape and visual impacts is primarily secured by the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]**, 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]**.

Residual Effects

Baseline

7.4.23 There are no national or local landscape designations within or immediately around the Site with the nearest (Chilterns National Landscape) approximately 30km from the Site.

7.4.24 The Site lies on the south side of a broad, shallow clay vale formed by a series of west–east tributaries that drain towards the River Great Ouse, which runs north–south to the east through St Neots. Within this vale the Order Limits occupy predominantly low-lying ground with relatively limited topographic variation when compared with the more undulating land beyond; the land rises to the north towards Grafham Water, to the west beyond Swineshead, and to

the south towards the Bedford Autodrome high point. This landform context, together with intervening vegetation, plays a primary role in containing views towards the Site and in controlling the depth and breadth of intervisibility across the study area. The LVIA records that the extent of theoretical visibility is chiefly influenced by subtle topographic transitions and tree cover, rather than built form, which is relatively limited in the rural setting.

7.4.25 The landscape pattern across the study area is broadly consistent: medium- to large-scale arable farmland punctuated by blocks and belts of woodland, with the western and northern higher ground more robustly wooded than the lower vale. Hedgerow cover varies, with stronger, more continuous hedgerows (often with intermittent hedgerow trees) on the higher ground and a more open pattern with fewer hedges towards the east. Settlement is dispersed and characteristically rural with small villages and hamlets such as Swineshead, Pertenhall, Keysoe, Little Staughton, Stonely, Great Staughton, Staughton Highway, Hail Weston and Duloe alongside farmsteads and individual properties. The LVIA notes several existing solar farms in the local visual context, including south of Pertenhall (adjacent to East Park Site A), at Little Staughton Airfield (approximately 1.2km south-west of Site C), and at High Wood (approximately 0.1km south of Site D), which contribute to the existing landscape and visual baseline.

7.4.26 The study area applied for the landscape and visual assessment extends to 3km from the Order Limits. This was established through zone of theoretical visibility (ZTV) modelling and field work. Initial ZTVs were produced to a 5 km radius and then narrowed to 3km as a proportionate study area, reflecting the modest vertical profile of the arrays and the containing influence of landform and vegetation.

7.4.27 Within the study area, notable landform and vegetation features that directly shape visibility include Willow Spinney on the south-western edge of Site A; tree cover around Pertenhall, Brook End and Little Staughton; riparian vegetation along the River Kym and around Great Staughton; woodland blocks immediately south and south-east of Site B; New Wood centrally within

Site C; tree cover on the south-western side of Hail Weston; roadside vegetation beside the A1 towards the east; and Little Paxton Wood north-east of Site D. These elements interrupt or filter views, particularly along village edges and rights of way.

7.4.28 **ES Vol 1 Chapter 5 Landscape and Visual [EN010141/DR/6.1]** has had regard to the Bedford Borough Landscape Character Assessment and the Huntingdonshire Landscape and Townscape Supplementary Planning Document in establishing the baseline landscape characteristics and guidelines for development.

7.4.29 The visual receptor baseline has been assembled from 83 representative viewpoints, selected to reflect the main receptor groups: residents in villages and nearby properties; public rights of way users; road users; and community receptors such as churchyards and recreation spaces. The LVIA explains that representative viewpoints are used to inform judgements across the wider receptor group, with susceptibility and value considered case-by-case rather than applying a blanket sensitivity rating by receptor type. A schedule of receptors and cross-references to viewpoint plates and photomontages is provided in **ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2]**.

7.4.30 In general, outward views from village edges are filtered or screened by perimeter tree belts and slight landform undulations. Where views are available, they tend to be glimpsed from upper storeys or through gaps in vegetation, with ground-level views more restricted.

7.4.31 Views from the open countryside vary with enclosure. Some rights of way run within hedged corridors or along breaks of slope that confine the view whilst others occupy more open locations on subtle rises, where longer-distance views open across arable fields to intervening tree belts and, occasionally, to church towers on the skyline.

7.4.32 The night-time baseline is predominantly dark rural, with limited sources of permanent lighting confined to settlements, isolated farmyards and the strategic road corridors.

7.4.33 Taken together, the baseline landscape and visual context is that of a contained, gently undulating rural landscape in which tree cover, hedged field structures, riparian vegetation and modest landform combine to restrict and filter intervisibility. The baseline assessment underpins the embedded mitigation measures and design strategy that keeps the Scheme low in profile, set back from ridgelines and village edges, and integrated by a robust, long-term green infrastructure framework secured through the **oLEMP [EN010141/DR/7.7]**.

Residual Effects

7.4.34 The LVIA identifies a limited and geographically focused set of significant effects, concentrated in close proximity to the Order Limits and chiefly during the construction phase and Year 0 of operation. The landscape character areas in which East Park Site A to D are located experience significant construction phase effects, reflecting temporary compounds, plant and activity, together with the establishment of the solar arrays and associated infrastructure. These effects are assessed as moderate–major Adverse during construction (significant in EIA terms). No other LCAs within the study area are significantly affected at any stage, with at most a partial influence beyond the Site itself. During operation, landscape character effects are not significant by Year 10, as structure planting matures and integrates the Scheme.

7.4.35 Significant visual effects arise where receptors are within or immediately adjacent to the Site, or on slightly elevated ground within approximately 1 km enabling views across the Scheme. During construction, significant visual effects have been identified on some residential and rights of way receptors located in close proximity to the Site. However, these effects would be for the short-term duration of construction

7.4.36 At Year 0 there would be significant visual effects on some residents of residential properties and users of rights of way located in proximity to the Scheme. Given the low density of settlement within the study area and the visual containment provided by subtle landform undulations and intermittent tree and hedgerow cover, a relatively small number of residential receptors have been identified as experiencing significant visual effects during operation of the Scheme. All residential receptors identified as experiencing significant visual effects are either individual properties, or small groups of properties, which would be subject to close-distance views of the Scheme. No significant visual effects have been identified on visual receptors located directly within the villages located within the Study Area.

7.4.37 The establishment of mitigation would give rise to a reduction in the level of effect from residential receptors, with all residential receptors experiencing a reduction in the change such that the residual effect at Year 10 is Not Significant. The proposed mitigation, in particular hedgerow planting on field boundaries, would be effective in screening a relatively low-level solar array at a maximum of 3m above ground level and would integrate it into the view overall.

7.4.38 Similar to the assessment of effects on residential receptors, all right of way receptors identified as likely experiencing significant visual effects due to the operation of the Scheme are located in close proximity to the Scheme. There is a relatively high number of rights of way identified as being subject to significant visual effects during Year 0 of operation as there is a relatively dense network of rights of way within the Study Area which provide connections between farms and small settlements.

7.4.39 The number of significant visual effects on users of public rights of way within the Study Area would notably reduce at Year 10 following the establishment of mitigation. While the proposed planting on the site would be effective in screening most views, there would remain a residual change from the baseline situation in the openness of views from locations in proximity to the Site and as such some significant long-term visual effects would remain.

7.4.40 In relation to the effects on the night sky, construction lighting will be temporary, task-focused and time-limited, with lighting directed and cowled to avoid light spill beyond working areas and controlled through the **oCEMP [EN010141/DR/7.3]**. In operation, the arrays will not be lit and only the substation and BESS will have low-intensity, downward facing, motion activated lighting for safety, maintenance and emergencies, managed through the **oOEMP [EN010141/DR/7.5]**. On that basis, the LVIA concludes no significant night-time visual effects, with effects assessed as negligible to minor

7.4.41 The LVIA includes a residential visual amenity assessment (RVAA) prepared in line with Landscape Institute TGN 02/19, testing whether the magnitude and nature of change at the nearest dwellings would approach the "Residential Visual Amenity (RVA) Threshold" such that living conditions are unacceptably affected. Six properties within a 100m RVAA study area were screened in to the assessment; for all six, it was found that orientation of principal rooms, existing boundary vegetation at ground-floor level, the low profile of the arrays relative to intervening field structure, and the progressive effect of mitigation planting mean the change does not approach the RVA Threshold at construction, operation or decommissioning. On that basis, no property-specific detailed RVAA was required and the RVAA concludes there would be no overbearing effect on residential visual amenity and no dwelling would become an unattractive place to live when judged objectively in the public interest. This conclusion sits alongside the LVIA finding that significant operational visual effects at Year 0 occur only at a small number of individual properties close to the Order Limits and reduce to not significant by Year 10 as planting establishes, with no significant effects identified within village envelopes.

7.4.42 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.

7.4.43 Following decommissioning there would be no residually significant landscape or visual effects and overall the planting implemented as part of the Scheme would leave a Site which would appear similar to the baseline situation, albeit with enhanced field structure planting which would comprise a beneficial change to landscape character.

Appraisal

7.4.44 The Applicant's approach to landscape and visual impact is consistent with national policy contained within NPS EN-1 and NPS EN-3, and largely in accordance with local planning policies, with some limited adverse effects that are considered acceptable when weighed against the benefits.

7.4.45 NPS EN-1 requires good design to ensure the policy objectives of the NPSs can be met and to produce sustainable infrastructure sensitive to place, but acknowledges that "*the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area*" (paragraph 4.7.2).

7.4.46 The iterative design process that has been followed is set out within the **Design Approach Document [EN010141/DR/5.6]**. The design process has been informed by the LVIA from the outset to ensure that the Scheme responds to its context, following the mitigation hierarchy to prevent landscape and visual harm where possible, with mitigation measures set out in Section 5.7 of **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]**.

7.4.47 The mitigation hierarchy embedded in the project of avoidance of designated and sensitive landscapes, reduction of impacts through screening, and compensation via enhancements, aligns with the NPS philosophy that applicants should mitigate impacts “as far as possible”.

7.4.48 NPS EN-3 advises using planting for screening and landscape integration and the Scheme incorporates substantial native planting for these purposes.

7.4.49 The LVIA has been carried out as per NPS EN-1 paragraphs 5.10.16-17, taking into account existing baseline landscape character assessments and local policies, as required.

7.4.50 The LVIA does identify significant residual adverse landscape and visual effects, but these are all local to the Site and immediately adjacent landscape. These effects cannot be further mitigated through the mitigation hierarchy.

7.4.51 For the long-term significant residual effects on PRoW users, the Scheme’s design measures will help make the overall experience for users acceptable despite the change in views from open farmland to more contained green lanes. This mitigation aligns with NPS EN-1’s encouragement of environmental enhancements as part of good design.

7.4.52 As set out earlier, paragraph 5.10.13 of NPS EN-1 acknowledges that major energy projects are “*likely to have visual effects for many receptors around proposed sites*” and directs the Secretary of State at paragraph 5.10.14 to “*judge whether the visual effects on sensitive receptors… outweigh the benefits of the project*”, and similarly at paragraph 5.10.35 to “*judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*”.

7.4.53 The substantial benefits of the Scheme are set out in Section 5 of this Planning Statement, and it is considered that these substantial benefits considerably outweigh the localised significant residual landscape and visual effects at the Site.

7.4.54 The Scheme is CNP Infrastructure and as set out above has followed the mitigation hierarchy through the design and EIA process; therefore, in accordance with paragraph 4.2.16 of NPS EN-1 the Scheme should be treated as meeting the requirements of paragraphs 5.10.14 and 5.10.35 which require the benefits of the project to outweigh the visual and landscape harm.

7.4.55 Furthermore, the Scheme's temporary nature and reversibility addresses NPS EN-1 paragraph 5.10.36 that any adverse impact on the landscape should be capable of being reversed in a reasonable timescale, which in this case would be in forty years when the Scheme is decommissioned.

7.4.56 The Scheme has been appraised against local plan policies relevant to landscape and visual impact within the **Policy Compliance Document [EN010141/DR/5.4]**.

7.4.57 In conclusion, having regard to the relevant national and local policies on landscape and visual amenity, and based on the findings of **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]**, the Scheme is considered to be acceptable and policy compliant.

7.5 Historic Environment

Planning Policy Context

7.5.1 Overarching policy considerations for the Historic Environment are set out within Section 5.9 of NPS EN-1. The NPS requires applicants to describe the significance of any heritage assets affected (paragraph 5.9.10), including any contribution made by their setting, with a level of detail proportionate to the asset's importance. The Secretary of State should give great weight to the conservation of heritage assets (paragraph 5.9.27); the more important the asset, the greater the weight, irrespective of whether the harm is substantial or less than substantial. NPS EN-1 also emphasises sustaining and where possible enhancing heritage significance (paragraphs 5.9.13 to 5.9.15).

7.5.2 In decision-making, NPS EN-1 distinguishes between substantial harm and less than substantial harm to designated assets.

7.5.3 If a development would cause substantial harm (or total loss of significance) to a designated heritage asset, consent should be refused unless that harm is necessary to deliver "substantial public benefits" that outweigh the harm (paragraph 5.9.31), or all of a strict set of tests are met (for example, no viable alternative use for the asset).

7.5.4 Where a project would lead to less than substantial harm to a designated asset's significance, NPS EN-1 (paragraph 5.9.32) requires that this harm be weighed against the public benefits of the proposal (including, where appropriate, securing the asset's optimum viable use).

7.5.5 For non-designated heritage assets, NPS EN-1 calls for a balanced judgment considering the scale of harm or loss and the asset's significance (paragraph 5.9.33).

7.5.6 NPS EN-1 makes clear that recording evidence of an asset is not a substitute for its conservation as a "documentary record of our past is not as valuable as retaining the asset" (paragraph 5.9.16). However, if loss of significance is justified, the applicant must record and advance understanding of the asset before it is lost, in a manner proportionate to its importance (paragraph 5.9.17).

7.5.7 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS acknowledges that solar farms can impact the historic environment both above ground (paragraph 2.10.108) – for example, effects on the setting of listed buildings or other designated assets – and below ground (paragraph 2.10.109), through disturbance of archaeological remains during construction.

7.5.8 NPS EN-3 highlights that large-scale solar developments have the potential to cause significant setting effects on heritage assets depending on their "scale, design and prominence", and it advises that applicants may need to

include visualisations to illustrate impacts on the settings of heritage assets (paragraph 2.10.118-119).

7.5.9 Paragraph 2.10.110 of NPS EN-3 recognises that solar farms can sometimes result in a positive effect on archaeology – for instance by taking land out of intensive ploughing, thereby protecting below ground remains.

7.5.10 NPS EN-3 notes that the duration of the consent should be taken into account when considering indirect effects on setting (paragraph 2.10.160), since the impacts, while long-term, are not necessarily permanent.

7.5.11 Across the host authorities, local policy requires a proportionate assessment of significance (including setting) and a design-led approach to avoid and minimise harm. Huntingdonshire's Local Plan Policy LP34 mandates assessment, prioritises preservation in situ for archaeology where feasible, applies the "substantial/less than substantial harm" assessment framework, and requires balanced judgements for non-designated assets. Bedford Borough Local Plan Policies 41S (Historic Environment) and 28S (Place-making) require sufficient information (including non-invasive and, where necessary, invasive evaluation), expect in-situ preservation where appropriate or full investigation, recording, publication and archiving where not, and seek positive enhancement through good design. The Great Staughton Neighbourhood Plan Policies GSNP9 and GSNP10 require development to preserve or enhance Conservation Areas, be sympathetic in scale, materials and distinctiveness to heritage assets, and undertake archaeological investigation with in-situ preservation for significant remains where practicable.

Assessment Conclusions

7.5.12 **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]** sets out the Applicant's full assessment of the likely significant effects on the historic environment as a result of the Scheme. This section of the Planning Statement contains only a brief summary of the likely impacts and effects.

Approach

7.5.13 The assessment of the historic environment follows published best practice guidance as detailed within **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]**, and assesses impacts at construction, operation and decommissioning on above and below-ground heritage assets.

7.5.14 The Applicant has undertaken archaeological geophysical surveys across most of the Site to inform the assessment, and these are reported in **ES Vol 2 Appendix 6-5: Archaeological Geophysical Survey Report [EN010141/DR/6.2]**.

7.5.15 The Applicant has also undertaken evaluation trial trenching across most of East Park Sites A to D, and this is reported within interim evaluation reports in:

- **ES Vol 2 Appendix 6-6: Site A Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-7: Site B Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**;
- **ES Vol 2 Appendix 6-8: Site C Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**; and
- **ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Interim Report [EN010141/DR/6.2]**.

7.5.16 Detailed reports including specialist assessments for Sites A, B, C and D will be made available prior to examination.

7.5.17 Further archaeological investigation across the remaining areas of the Site is proposed and set out within Section 5 of the **oAMS [EN010141/DR/7.15]**.

7.5.18 Visualisations have been prepared to illustrate the Scheme from a number of designated heritage assets as part of the visual assessment within **ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]**, and these visualisations are presented within **ES Volume 3 Figures [EN010141/DR/6.3]**.

Design and Mitigation Measures

7.5.19 The Applicant has applied the mitigation hierarchy in developing the design and impact mitigation measures for cultural heritage.

7.5.20 From the outset, at the site identification and land identification stages of site selection the Applicant has sought to steer development away from sensitive heritage receptors. This process is set out in **ES Vol 2 Appendix 3-2: Land Identification Report [EN010141/DR/6.2]** which explains how Early Design Principles were adopted to identify land parcels that were "*sensitive to heritage assets, looking to protect the most valuable assets that contribute to a sense of place*", and how parcels were excluded or buffered accordingly during land identification.

7.5.21 Section 5.6 of the **Design Approach Document (DAD) [EN010141/DR/5.6]** explains how, in relation to Design Principle 2.1, the Applicant identified at the outset of the design process that church spires are visually prominent landmarks in the local landscape, contributing towards the sense of place.

7.5.22 As an example, the DAD sets out a field-based visual analysis and the principle to protect views towards tall church spires. For the Church of All Saints at Little Staughton in particular, the team mapped near-, middle- and long-distance view corridors to and from the ridgeline church and deliberately excluded or set back land so that public views towards the churches would remain largely free of solar infrastructure. Where arrays are visible in the broader panorama, intervening hedgerows and filtered planting have been used to ensure the spire's landmark quality remains legible on the skyline. Comparable, location-specific measures were applied to churches within Pertenhall, Keysoe, Great Staughton and Swineshead.

7.5.23 The same avoidance principles were applied to archaeological constraints. Following geophysical survey and targeted trenching that revealed the Roman small town south of Great Staughton, the area was taken out of the permanent developable footprint. Following consultation with Historic England the Roman small town was subsequently designated as a Scheduled

Monument by the East Park Energy project team prior to statutory consultation in September 2024 (to provide legal protection of the archaeology once it was in the public domain). Instead, the Roman small town south of Great Staughton is included as part of the Scheme's green infrastructure and habitat creation measures, ensuring the remains are left in situ and protected from harm. Historic England, in its consultation feedback, welcomed this approach and noted that taking the scheduled site out of arable cultivation (as the Scheme will do) is a heritage benefit.

7.5.24 The layout of the solar arrays, cable routes, and access tracks has been refined to avoid direct impacts on other known heritage features. For instance, the design maintains existing field boundaries and hedgerows wherever possible, which not only respects the historic landscape character (field patterns can be heritage assets in themselves) but also helps to avoid disturbing potential archaeological deposits along old hedgerow lines.

7.5.25 Where avoidance of impact has not been possible, the Scheme incorporates measures to minimise harm. This includes sensitive design and landscaping measures aimed at reducing visual intrusion on the settings of heritage assets. The solar panel arrays have been broken up with intervening open grassland strips and enhanced hedgerow or woodland planting to soften views. In particular, near the heritage-sensitive edges (such as around the moated site in Site D and adjacent to listed buildings or conservation areas), setbacks from heritage assets have been used to reduce the prominence of the Scheme.

7.5.26 Existing hedges will be strengthened and new native planting introduced to help screen the infrastructure in views from key heritage viewpoints (while being mindful not to fundamentally alter the character of historic rural vistas).

7.5.27 As set out earlier, an **oAMS [EN010141/DR/7.15]** has been prepared which sets out the measures to be adopted to avoid and reduce impacts to buried archaeological remains. Critical to this is the identification of 'Areas of Archaeological Constraint' (AACs) which ahs been informed by survey and

field undertaken to date, and will continue to be refined post-consent in consultation with county archaeologists based on further archaeological investigation (that is set out within Section 5 of the oAMS).

7.5.28 Wherever an AAC coincides with proposed works, the oAMS sets out the measures that will be adopted avoid or reduce ground disturbance. This includes no dig solutions such as the use of trenchless construction (e.g. horizontal directional drilling for cabling) beneath sensitive areas to avoid direct impacts on buried heritage features.

7.5.29 As set out in the oAMS, bespoke mitigation measures will be tailored to each AAC based on the nature of the remains. In areas of highest archaeological sensitivity, the preferred approach is preservation in situ – for instance, by adjusting the design or using “no-dig” construction methods so that significant deposits remain undisturbed. Where construction cannot completely avoid an AAC, a programme of targeted archaeological investigation will be undertaken in advance (or under archaeological supervision during works) to excavate and record the affected remains, thereby mitigating the impact through detailed recording and archiving of the information. In lower-sensitivity areas, an archaeological watching brief or monitoring during groundworks may be implemented to promptly identify and protect any unexpected finds.

7.5.30 This graduated response ensures that mitigation is proportionate and effective, priority is given to avoiding and minimising impacts on archaeology, and where impacts are unavoidable they are mitigated through excavation, recording, and where appropriate, post-excavation analysis and dissemination.

7.5.31 In parts of the ACC areas that are proposed for woodland and hedgerow enhancement, which cannot be mitigated by ‘no-dig solutions’ ‘*Strip, map and sample’* excavation is proposed subject to consultation with BBHET, CHET and HE. The proposed methodology for these areas of *‘Strip, map and sample’* excavation is set out in the **oAMS [EN010141/DR/7.15]**

7.5.32 The oAMS and **oCEMP [EN010141/DR/7.3]** note that the Scheduled Monument (Roman Small Town at Great Staughton) within Site C will be demarcated on Site and protected during construction, except in so far as the temporary access track that crosses it, and cabling works that will be horizontal directionally drilled beneath the archaeology.

7.5.33 The **oAMS [EN010141/DR/7.15]** is a control document that will be certified as part of the Development Consent Order (DCO) and secured via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Archaeological Mitigation Strategy (AMS) is prepared and agreed with the LPAs and Historic England.

7.5.34 To enhance and disseminate knowledge of the historic environment, all reporting and archives prepared for the Site will be made available through appropriate channels. The reports will be submitted to the Cambridgeshire Historic Environment Record and Bedford Borough Historic Environment Record which is a publicly available record. The archive (digital and physical) will also be deposited with the Archaeology Data Service.

7.5.35 The Applicant has also prepared an **outline Heritage Enhancement Strategy (oHES) [EN010141/DR/7.16]** as part of the application. This strategy sets out how the Applicant intends to increase the understanding, experience and appreciation of the historic environment and thus provide enhancement and public benefit.

7.5.36 Collectively, the measures set out above summarise how the Applicant has followed the mitigation hierarchy to avoid and reduce impacts on the historic environment, and then provide enhancement for public benefits.

Residual Effects

Baseline

7.5.37 **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]** provides a detailed baseline description of designated

and non-designated heritage assets within the Site and within a wider study area, supported by desk-based assessment and field evaluations that are reported in the supporting appendices to the ES chapter within **ES Volume 2 [EN010141/DR/6.2]**.

7.5.38 A 3 km study area was used for identifying designated heritage assets whose settings might be affected (a smaller 1 km radius was used for direct physical impacts). The scope of the assessment to heritage assets was agreed with the host authorities during pre-application consultation.

7.5.39 There are no World Heritage Sites, Registered Battlefields, or Registered Parks and Gardens within the study area.

7.5.40 At the time of the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of the environmental assessment of the Scheme discovered the site of a Roman Town in East Park Site C. Due to the national importance of the archaeological finding, the Applicant has been engaging with Historic England on the find since it was identified in January 2024. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to the Secretary of State for Culture, Media and Sport (via Historic England) to designate the area as a scheduled monument. The application was accepted, and the remains were designated as a scheduled monument in September 2024.

7.5.41 There is one scheduled monument adjacent to the southern boundary of East Park Site C, 'two bowl barrows, 900 m and 1,000 m east of Old Manor Farm'. 'Roman site, Rushey Farm' scheduled monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' scheduled monument is located circa 770 m west of the East Park Site C boundary.

7.5.42 There are a large number of listed buildings in the landscape around the Site. However, none of these listed buildings are within the Site. The most notable of the nearby listed buildings are the series of Grade I listed churches located at Great Staughton, Little Staughton, Pertenhall, Keysoe, and Swineshead.

There are also conservation area designations nearby at Great Staughton and Swineshead.

7.5.43 There are a large number of non-designated heritage assets in the vicinity of and within the Site.

Residual Effects

7.5.44 **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]** concludes that the only significant residual direct effects within the construction phase of the Scheme would be as a result of landscape planting upon surviving archaeological remains within the ACC's that have been proposed for 'strip map and sample' excavation (see oAMS [EN010141/DR/7.15]). For the most part the landscape planting in these areas is needed for other mitigation including mitigating the visual and setting effects of the Scheme. The excavation and recording of the assets within these areas would add to a wider understanding of the historic environment of the Site and the region ensuring that impacts are offset via 'preservation by record'. However, this would not be sufficient to prevent significant residual effects.

7.5.45 Temporary construction-phase setting effects will cease once construction ends.

7.5.46 During the operational phase there would be a moderate adverse (significant in EIA terms) effect to a non-designated possible moated site in East Park Site D as a result of a change in setting. This non designated asset which is an earthwork of probable medieval origin would be immediately surrounded to its north and east by solar farm infrastructure, including solar panels and the proposed BESS and on-site substation. The presence of modern structures in what is currently an open agricultural landscape will remove part of the asset's immediate rural setting that contributes to its significance. The nature of the impact is purely in terms of setting (indirect visual impact) as the physical fabric of the moated site will remain intact. It is noted that no further mitigation measures beyond the embedded landscaping would meaningfully

reduce this impact. Effects to all other heritage assets would be at worst minor adverse (not significant in EIA terms)

7.5.47 The decommissioning phase would not give rise to significant residual effects, and after decommissioning, the setting of all heritage assets would return broadly to the current baseline (aside from any changes due to retained planting).

7.5.48 In conclusion, the ES finds that the Scheme will cause no substantial harm to heritage assets. The worst-case harm is limited to a low to medium level of less than substantial harm to one non-designated heritage asset's setting and significant direct construction phase impacts upon parts of the ACCs due to landscape planting. All impacts have been mitigated as far as practicable through design and planned measures.

Appraisal

7.5.49 The approach to the historic environment accords with NPSs EN-1 and EN-3. The Applicant has undertaken proportionate assessment of significance, desk study, geophysics, evaluation trenching, setting analysis and representative visualisations; has applied the mitigation hierarchy by avoiding harm through design, reducing and recording where avoidance is not practicable, and committing to publication / archiving and public benefits via the **oHES [EN010141/DR/7.16]**. This meets the expectations of NPS EN-1 (paragraphs 5.9.9–5.9.17) and NPS EN-3 (paragraphs 2.10.107–2.10.119).

7.5.50 In policy terms, 'great weight' is afforded to the conservation of designated heritage assets (NPS EN-1 paragraph 5.9.27). The ES identifies only minor adverse (and not significant in EIA terms) operational setting effects for designated heritage assets, amounting to less than substantial harm. In accordance with NPS EN-1 paragraph 5.9.32, these harms must be weighed against the public benefits of the Scheme. The substantial public benefits of the Scheme are set out in Section 5 of this Planning Statement, and it is considered that these substantial public benefits decisively outweigh the less

than substantial harm (which is assessed as being towards the lower end of the spectrum).

7.5.51 For non-designated heritage assets, NPS EN-1 paragraph 5.9.33 requires a balanced judgement. The Scheme gives rise to a moderate adverse (significant in EIA terms) operational setting effect on a possible moated site. Against this harm, the balance includes the urgent need for renewable energy generation (which is afforded substantial weight at paragraph 3.2.6 of NPS EN-1), and the secured enhancements and public engagement that will deliver public benefit. The benefits of the Scheme are set out in Section 5 of this Planning Statement and are considered again to decisively outweigh this harm.

7.5.52 The Scheme is CNP Infrastructure and as set out above has followed the mitigation hierarchy through the design and EIA process; therefore, in accordance with paragraph 4.2.16 of NPS EN-1 the Scheme should be treated as meeting the requirements of paragraphs 5.9.32, 5.9.33, and any other relevant local planning policy.

7.5.53 The time-limited nature of the consent (forty years) and reversibility of the Scheme is a further important consideration, as set out in paragraph 2.10.160 of NPS EN-3.

7.5.54 The Applicant has engaged with Historic England with regards scheduled monument consent for the works to the Roman small town south of Great Staughton scheduled monument, and Historic England have indicated that they would raise no objection to the **draft DCO [EN010141/DR/3.1]** including for the scheduled monument consent, subject to their agreement to the final Archaeological Mitigation Strategy (which is secured by a Requirement of the draft DCO). The Applicant intends to agree a Statement of Common Ground on this matter with Historic England prior to examination.

7.5.55 The Scheme has been appraised against local plan policies relevant to the historic environment within the **Policy Compliance Document [EN010141/DR/5.4]**.

7.5.56 Accordingly, the Scheme complies with NPS EN-1 and NPS EN-3 on the historic environment, and meets local policy by demonstrating a proportionate understanding of significance, prioritising preservation in situ, providing for investigation and publication where needed, and delivering positively framed enhancements to the historic environment.

7.5.57 In conclusion, having regard to the relevant national and local policies on the historic environment, and based on the findings of **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]**, the Scheme is considered to be policy compliant.

7.6 Biodiversity and Nature Conservation

7.6.1 In reading this section it is relevent to note that the planning appraisal in relation to Habitats Regulations Assessment is set out separately in Section 7.7. The planning appraisal relevant to Biodiversity Net Gain is set out in Section 7.8.

Planning Policy Context

7.6.2 Overarching Biodiversity and Nature Conservation policy considerations are set out within Section 5.4 of NPS EN-1. The NPS requires applicants to assess effects on internationally, nationally and locally designated sites, protected species, and habitats of principal importance including irreplaceable habitats (paragraph 5.4.17).

7.6.3 NPS EN-1 expects projects to avoid significant harm to biodiversity through careful design and mitigation, and to provide enhancements where possible (paragraph 5.4.21).

7.6.4 The Secretary of State is instructed to attach appropriate weight to designated nature conservation sites (international, national, local) and protected species when making decisions (paragraph 5.4.48).

7.6.5 NPS EN-1 states that development causing adverse effects on SSSIs should not normally be permitted unless the benefits clearly outweigh the impacts on

the site and broader network (paragraph 5.4.8). Further, the Secretary of State should ensure harmful aspects of the development on the SSSI are mitigated, and where possible, ensure the enhancement of the SSSI's biodiversity interest (paragraph 5.4.50).

7.6.6 Paragraph 5.4.12 of NPS EN-1 notes that Local Wildlife Sites can make an important contribution to ecological networks and nature recovery, and paragraph 5.4.52 states the Secretary of State should give due consideration to regional or local designations, but that these in themselves should not be used to refuse development consent.

7.6.7 Paragraph 5.4.55 states that harm to protected species or important habitats should be avoided or mitigated; if such harm would result and cannot be mitigated, consent should be refused unless there is an overriding public interest and all legal tests are met.

7.6.8 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS directs that generic biodiversity impacts are covered by NPS EN-1 Section 5.4, and that applicants should conduct thorough ecological assessments for solar farm sites (paragraph 2.10.76-77). Key species of concern (for example, ground-nesting birds, wintering birds, bats, great crested newts, water voles, badgers, etc.) should be identified and potential impacts assessed.

7.6.9 Policy 42S 'Protecting Biodiversity and Geodiversity' of the Bedford Borough Local Plan 2030, Policy LP 30 'Biodiversity and Geodiversity' of the Huntingdonshire Local Plan to 2036, and Policy GSNP 11 'Biodiversity and Wildlife Habitats' of the Great Staughton Neighbourhood Plan 2021 to 2036 are the principal local planning policies on ecological conservation and require development proposals to assess the impact of development on biodiversity and geodiversity.

7.6.10 Generally, the local policy context reinforces that development should minimise ecological harm, avoid fragmentation of habitats, and deliver tangible biodiversity improvements. Sites should be protected from loss or

damage taking account to; the hierarchy of designations; the irreplaceability of habitats; and the impact on priority habitats and species.

Assessment Conclusions

7.6.11 **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** sets out the Applicant's full assessment of the likely significant effects of the Scheme on ecological receptors. This section of the Planning Statement contains only a brief summary of the likely impacts and effects.

Approach

7.6.12 The approach to surveys and assessment of ecological receptors was undertaken in accordance with published best practice guidance by experienced professional ecologists, as set out in **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**. Habitat and protected species surveys have been undertaken over several years between 2022 and 2025.

Design and Mitigation Measures

7.6.13 Following the selection of the Site (as set out in **ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]**), the Scheme has followed the mitigation hierarchy to address potential ecological impacts identified through the EIA process.

7.6.14 From the outset, the design of the Scheme was informed by ecological surveys to avoid sensitive habitats and species wherever feasible. The results of the Preliminary Ecological Appraisal were reviewed early in the design process to identify areas of highest ecological value within the Site. These high-value habitat areas were excluded from development where possible.

7.6.15 As identified on the Illustrative Environmental Masterplan on **ES Volume 3 Figure 2-1 [EN010141/DR/6.3]**, existing woodland, hedgerows, individual trees, ditches and watercourses across the Site have been retained as far as

practicable, ‘Green Lanes’ have been created throughout the Site where public rights of way are retained within open 20m wide corridors bounded by hedgerows and woodland blocks, enhancements to waterside meadows are also proposed, as well as the planting of hedgerows with trees, species-diverse grassland meadows and corridors, and the inclusion of mammal gates within all fence lines to solar areas.

7.6.16 The landscape proposals from the Illustrative Environmental Masterplan are repeated on the Illustrative Landscape Proposals drawing at **Appendix A** of the **outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]**.

7.6.17 An **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]** has been prepared to control construction-phase effects through best practice measures. The plan details site protection measures during construction, including fencing to protect sensitive ecological or hydrological features, and identifies that an Ecological Clerk of Works (EcoCoW) will be appointed to oversee all activities with the potential to affect ecological receptors. The EcoCoW will ensure that Reasonable Avoidance Measures (RAMs) for protected species are implemented.

7.6.18 The **oCEMP [EN010141/DR/7.3]** outlines controls for runoff, dust, noise and vibration to ensure adjacent habitats (such as ditches and ponds) are not adversely affected during works. It also sets out a sensitive lighting strategy to manage temporary lighting used during the construction phase.

7.6.19 In order to avoid impacts on nesting birds and to ensure compliance with the provisions of the Wildlife and Countryside Act 1981 (as amended), vegetation removal would take place outside of the bird breeding season wherever possible. If vegetation works (including any crop or hedgerow removal required to facilitate development) are necessary during the breeding season, any suitable nesting habitat to be affected by works would be checked by a suitably experienced ecologist prior to works commencing.

7.6.20 Trees present within the Site would be retained and protected during construction. If plans change and trees require removal / felling as part of the Scheme (for instance to aid access requirements or for health and safety purposes), prior to removal, in accordance with current Bat Conservation Trust (BCT) guidance, any trees would be subject to a ground level tree assessment (GLTA) in order to assess the tree's potential to support roosting bat species. Trees with Potential Roost Feature-Multiple (PRF-M) would be subject to a detailed aerial inspection and / or emergence / re-entry surveys in the appropriate season. If bats are confirmed roosting within the tree(s), no removal would take place until a European Protected Species Mitigation Licence has been issued by Natural England and necessary mitigation measures set in place under the supervision of a licensed ecologist. If works on trees with Potential Roost Feature-Individual (PRF-I) are necessary, these would be felled under RAMS and Precautionary Working Method Statement, in line with BCT Guidance (2023) and UK Bat Mitigation Guidelines (2023). Should a bat (or nesting bird) be found during this process then works would cease immediately and the EcoCoW contacted immediately for advice. Other than during winter when day length is short, works are not expected to occur in the hours of darkness.

7.6.21 The Scheme has been designed to avoid impacting linear ditch habitats with potential suitability to support otter and water vole as far as reasonably practicable. RAMs will be implemented during the construction phase to safeguard any otters within terrestrial habitat during works.

7.6.22 Furthermore, the Scheme layout has been designed to avoid impacting habitats most likely to be used by badgers for both sett building and foraging and commuting (field boundary features). These habitats will be largely retained and protected during the construction process. A pre-construction badger survey (including land within 30 m of the Site, where access allows) would be completed by a suitably qualified ecologist immediately prior to the commencement of construction / site clearance works to determine levels of

badger activity and to check for any newly constructed setts in and surrounding the Site.

7.6.23 As a precaution, RAMs would be implemented to avoid significant impacts on amphibian, reptile and other notable mammal populations, if present. The RAMs would include a 'toolbox talk', a two-stage cut of suitable vegetation, and watching brief by an appropriately qualified EcoCoW to minimise risk of accidental harm.

7.6.24 Where a 'dry crossing technique' is required for the construction of a new or improved crossing point, the section of water between the dams would be inspected for fish and other aquatic life such as eels. Where considered appropriate, a fish rescue plan would be executed. Standard measures to ensure runoff control and pollution prevention to be implemented via the **oCEMP [EN010141/DR/7.3]** and the **outline Surface Water Management Plan [EN010141/DR/7.13]** would also avoid significant impacts on fish populations, if present. The use of Silt Busters / sedimats / straw bales will also be used to protect downstream watercourses from silt inputs during prolonged dewatering.

7.6.25 Prior to the commencement of construction, a botanical invasive species walkover survey will be undertaken during an appropriate time of year (May – October) in order to assess the spread of invasive species within the Site. An appropriate invasive botanical species treatment program would then be implemented by a licensed and experienced invasive species contractor.

7.6.26 Furthermore, suitably sized gaps or mammal gates would be installed at appropriate intervals and locations along the perimeter fence line to allow small mammals, including badgers, free movement across the Scheme.

7.6.27 The Applicant has prepared an **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** as part of the application for development consent. The **oOEMP [EN010141/DR/7.5]** outlines the principles, controls, and measures to be implemented during the operational phase to reduce potential significant environmental effects from occurring,

including pollution control measures and a sensitive lighting strategy. The oOEMP also includes specific measures that will need to be adopted during the replacement and maintenance of any equipment, plant or machinery during the lifetime of the Scheme.

7.6.28 In addition, the Applicant has prepared an **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6].** The **oDEMP [EN010141/DR/7.6]** sets the framework for the management of environmental impacts during the decommissioning phase of the Scheme. The oDEMP sets out monitoring and auditing activities which would be used to ensure mitigation measures are carried out, recorded and effective.

7.6.29 Collectively, these measures ensure that any unavoidable impacts are tightly controlled and kept to a minimum. By following industry best practice and mitigation guidelines, the Scheme substantially reduces residual harm to habitats and species.

7.6.30 In circumstances where some ecological impacts are inevitable even after avoidance and mitigation measures, the Scheme provides compensatory measures to offset residual losses. Consistent with the mitigation hierarchy principle, such compensatory steps have been considered as a last resort and are designed to ensure no net loss of biodiversity.

Designated Sites

Baseline

7.6.31 No international statutory designated sites for nature conservation were identified within 10km of the Order Limits, however Eversden and Wimpole Woods Special Area of Conservation (SAC), which features barbastelle bat as a qualifying feature is located within 30km of the Site.

7.6.32 Eighteen national statutory designated sites for nature conservation are located within 5km of the Site, the closest being Swineshead Wood SSSI, located approximately 925m north-west. A summary of statutory designated sites is given in Table 7.10 of **ES Vol 1 Chapter 7: Ecology and Nature**

Conservation [EN010141/DR/6.1] and shown on **ES Vol 3 Figure 7-1a to 7-1c [EN010141/DR/6.3]**.

7.6.33 At a local level, Kangaroo Meadow County Wildlife Site (CWS) and Huntingdon Wood CWS are located adjacent to the Site. All other non-statutory designated sites for nature conservation are located over 100m from the Site. A summary of non-statutory designated site is given in Table 7.11 **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** and shown on **ES Vol 3 Figure 7-2 [EN010141/DR/6.3]**.

Effects

7.6.34 **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** concludes that all statutory designated sites for nature conservation are sufficiently distanced that no direct impacts are anticipated. Similarly, due to the separation distances involved and given the implementation of standard pollution control measures within the embedded **oCEMP [EN010141/DR/7.3]** and **outline Surface Water Management Plan [EN010141/DR/7.13]**, no indirect impacts are anticipated due to pollution from runoff or dust generated during construction.

7.6.35 Eversden and Wimpole Woods SAC is located approximately 17.5km south-east of the Scheme, and is designated for maternity colonies of barbastelle bat, as well as for offering a foraging and commuting area for the species. The Site is sufficiently distant as to lie outside the core sustenance zone of barbastelle bats roosting within Eversden and Wimpole Woods SAC, which is taken to be approximately 6km from a roost site. However, barbastelle bats are known to migrate up to 40km between summer and winter roosts and therefore it is feasible that construction of the Scheme could disrupt summer-winter migration routes of bats roosting within Eversden and Wimpole Woods SAC.

7.6.36 The barbastelle tends to stick to wooded linear features when travelling and it is considered likely that the species would also utilise boundary features when migrating between summer and winter roosts. As such, any loss of

hedgerow could disrupt these routes. Taking into account the small scale of hedgerow removal proposed as part of the Scheme and the embedded mitigation measures set out within the **oCEMP [EN010141/DR/7.3]** including hedgerow retention buffer zones and light spill prevention measures, it is concluded that the construction of the Scheme will have no discernible effect on mobile bat qualifying features associated with Eversden and Wimpole Woods SAC.

7.6.37 Minor hedgerow removal will result in no measurable (negligible / neutral) impacts upon Eversden and Wimpole Woods SAC, a receptor of high sensitivity. Effects are therefore not significant.

7.6.38 No non-statutory designated sites for nature conservation are located within the Site and so given all works will be confined to the Site boundary, no direct impacts are anticipated on any such site.

7.6.39 Kangaroo meadows CWS is located immediately adjacent to East Park Site B, while Huntingdon Woods CWS is located immediately adjacent to the grid connection route. Works in proximity to Huntingdon Woods CWS and Kangaroo Meadows CWS will be short term and temporary. Given the implementation of embedded best practice mitigation and avoidance measures, construction of the Scheme is unlikely to have any discernible effect on Huntingdon Woods CWS or Kangaroo Meadows CWS.

7.6.40 All other non-statutory sites for nature conservation are located over 100m from the Site and so are considered sufficiently distanced from the Scheme that no impacts are anticipated.

Habitats

Baseline

7.6.41 Detailed baseline information in relation to habitats is provided in **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**. Habitats are shown on **ES Vol 3 Figure 7-3 [EN010141/DR/6.3]**.

7.6.42 East Park Site A predominantly consists of large arable fields bounded by species-poor hedgerows. Within the north of Site A lies the Pertenhall Brook. Habitats immediately beyond the Site A boundary include further arable fields, blocks of plantation broadleaved woodland, as well as the existing Manor Farm solar array.

7.6.43 East Park Site B similarly comprises agricultural habitats. Fields are bounded by hedgerows, typically species-poor. Ditches are also present, as well as some small streams that are tributaries of the Pertenhall Brook. Furthermore, A few small areas of broadleaved woodland are located within the Site. Habitats immediately beyond the Site B boundary include further arable fields, with the village of Little Staughton to the South.

7.6.44 East Park Site C surrounding New Wood consists predominantly of arable fields bounded by ditches and with modified grassland margins. New Wood is located centrally in the parcel, which is an oak dominated woodland with evidence of use for gamebird rearing. The River Kym is present to the north of Site C, a river approximately 5m wide and with banks modified by reprofiling. The river is lined with trees including ash and willow. Habitats immediately beyond the Site C boundary include further arable fields, with the village of Staughton Highway to the north.

7.6.45 East Park Site D comprises predominantly arable fields with small blocks of woodland and scrub on the western boundary, as well as recent hedgerow planting. Field boundaries are less well established in this Site. Habitats immediately beyond the East Park Site D boundary include further arable fields. High wood, a small woodland block, and a solar farm is present to the south of East Park Site D.

7.6.46 Cable corridor Site B to Site C runs across an unnamed road, as well as arable fields. Cable corridor Site C to Site D runs across Moor Road and an arable field.

7.6.47 The grid connection between Site D and Eaton Socon Substation crosses open arable fields, Duloe Brook, Duloe Lane and Bushmead Road, as well as

woodland around the Eaton Socon Substation. Habitats adjacent to the grid connection predominantly consist of arable land but also include a pond and Huntington Wood (Ancient Woodland and CWS).

Effects

7.6.48 The Scheme has been designed to avoid and minimise habitat loss and fragmentation, focusing the solar arrays on the existing low-value fields while retaining the boundary and linear features. Important semi-natural habitats such as woodlands, hedgerows, tree lines, and drainage ditches will be preserved, with only minor sections of hedgerow removed and a few new open-span crossing points over ditches where absolutely necessary. This approach maintains effective ecological connectivity across the Site, allowing wildlife to continue moving along established corridors.

7.6.49 Given the retention of high value habitats, and the Scheme location within mostly low value arable land, the construction of the Scheme, which is temporary and expected to last approximately 2 to 3 years, is anticipated to result in a minor adverse effect to on-site habitats that is not significant.

7.6.50 Extensive habitat creation and enhancement measures are embedded in the Scheme to ensure that any losses are offset by gains in habitat quality and extent.

7.6.51 The illustrative landscape proposals on **ES Volume 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** include the planting of over 17km of native species hedgerow, the seeding of approximately 205 ha of species-diverse grassland and 448 ha of grazing pasture, and the planting of 19 ha of woodland and 375 individual trees.

7.6.52 Overall, it is considered through the implementation of the landscape proposals and oLEMP that the extent and quality of priority habitats within the Site will be enhanced, resulting in a moderate beneficial effect on a receptor of medium value that is significant. Furthermore, operation of the Scheme will have a minor beneficial effect on on-site habitats.

Species

Birds (Breeding and Non-breeding)

7.6.53 Habitats within the Site are suitable to support a range of widespread breeding birds, including ground nesting species within more open arable land and a wide range of species typical of lowland arable landscapes (e.g., passerines, corvids, owls, raptors) within boundary woodlands, hedgerows and trees.

7.6.54 Habitats within the Site are suitable to support a range of non-breeding bird species, however those recorded on the ground within the Site were predominantly in low numbers and sporadically present in both 2021-22 and 2023-24 surveys. Usage was considered to be typical of the habitats and region, and unremarkable.

Effects on Birds

7.6.55 Hedgerows will be retained and protected throughout construction with the exception of 54m total of hedgerow, the removal of which will be undertaken following best practice measures outlined within the embedded **oCEMP [EN010141/DR/7.3]** which includes pre-construction checks (if within the nesting bird season). As such, any species which nest at the base of hedgerows will not be directly impacted by the Scheme.

7.6.56 Ground-nesting birds which nest in open farmland habitats, such as skylark, are likely to be displaced by construction of the Scheme. Measures outlined within the **oCEMP [EN010141/DR/7.3]**, including works to be undertaken outside of the bird breeding season where reasonably practicable and the requirement for pre-works checks for nesting birds, will ensure no direct impacts. Species afforded protection from disturbance through Schedule 1 of the Wildlife and Countryside Act 1981**Error! Bookmark not defined.** will be further protected under supervision from an EcoCoW.

7.6.57 Construction of the Scheme could result in the temporary (for the duration of construction) disturbance to ground nesting birds located within and in close proximity to the Site where construction is undertaken within the breeding

season. However, given the phased and temporary nature of the construction process, the disturbance of ground nesting bird species is anticipated to result in a minor adverse effect upon receptors of medium sensitivity, which is not significant.

7.6.58 The illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** include the planting of over 17km of native species hedgerow, 19 ha of woodland planting and 375 trees. Creating hedgerows, woodland and trees will offer increased nesting habitat for a range of notable and non-notable breeding bird species. Increased nesting and foraging habitat during the lifetime of the development will result in a moderate beneficial effect on the breeding bird assemblage of medium value which is significant.

Bats

7.6.59 During the extended habitat survey eight trees were identified as possessing potential roost features (PRF), including woodpecker holes, rot holes and limb cracks. In addition, a log storage building in East Park Site B was assessed as offering moderate bat roost potential and two barns adjacent to East Park Site A were assessed as offering high bat roost potential.

7.6.60 Habitats within the Site as a whole are considered to fit the description most closely for land of 'moderate' interest for foraging bats in accordance with BCT guidance, with continuous habitat connected to the wider landscape that could be used for commuting and foraging. However, the arable habitats, which the Site is dominated by, offer poor quality habitat for foraging and commuting bats.

7.6.61 Linear features within and around the Site such as tree lines, hedgerows, field margins, ditches, woodland edges and watercourses are considered to offer the most favourable habitats for foraging / commuting bats, particularly the Pertenhall Brook and the River Kym.

7.6.62 Nighttime bat walkover (NBW) surveys, also referred to as walked transect surveys, recorded a minimum of six species on Site: common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, noctule, brown long-eared, barbastelle and Myotis spp bats. Only common and soprano pipistrelle were consistently recorded across all transects during each survey visit. Observed bat activity during NBW surveys was most frequently distributed in association with wooded linear features and woodland edge habitats. Comparable results were found during static detector surveying.

Effects on Bats

7.6.63 The most important habitats within the Site for foraging and commuting bats, including hedgerow and watercourses will be retained and protected with buffer zones of at least 6m, with the exception of small-scale removal / widening totalling 54m (maximum 6m in any one location) required to permit Site access, which would not be of a sufficient scale to disrupt or fragment bat flight patterns. Of the hedgerow loss, 37m of this would be temporary and restored post-construction.

7.6.64 Temporary mobile lighting towers may be required at construction compounds during the winter months to comply with health and safety requirements. The period in which this lighting may be required would broadly coincide with the period in which bats would be hibernating and so is unlikely to disrupt foraging or commuting routes.

7.6.65 The **oCEMP [EN010141/DR/7.3]** includes commitments on lighting, which will ensure that features of value for foraging and commuting bats are not subject to excessive additional lighting during construction of the Scheme.

7.6.66 It is considered that the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha of species diverse grassland, hedgerow planting and woodland planting will enhance the landscape for both foraging and commuting bats. This will be achieved by providing greater connectivity at a landscape scale through linear features and increasing the invertebrate prey resource through

increased habitat quality and diversity of a previously homogenous landscape.

7.6.67 Given the implementation of embedded best practice avoidance and mitigation measures, construction of the Scheme is unlikely to have any discernible effect and will result in negligible impacts upon foraging and commuting bats of medium sensitivity.

7.6.68 Given the embedded mitigation in the landscape proposals and the **oLEMP [EN010141/DR/7.7]**, namely hedgerow and grassland creation, the Scheme will result in moderate beneficial effect on the foraging and commuting bat assemblage over its lifetime of medium value which is significant.

Amphibians

7.6.69 A total of three ponds are located within the Site with a further 24 ponds located within 250m of the Site. Of these, two ponds within the Site and eight within 250m were accessed for great crested newt eDNA survey in 2022 and three ponds within the Site and ten ponds within 250m were accessed in 2025.

7.6.70 Great crested newt is shown to be present in two of the ponds on Site, and four of the ponds surveyed within 250m of the Site. Beyond 250m, great crested newts were present in one pond surveyed. In addition, it is likely that ponds support other common species of amphibian, including common toad.

7.6.71 Terrestrial habitats within the Site are predominantly sub-optimal for amphibians, comprising predominantly arable land, however discrete aeras of the Site, including field margins and hedgerow bases offer more suitable habitat.

<u>Effects on Amphibians</u>

7.6.72 Potential impacts to amphibians relate to the temporary loss of habitat during construction, incidental harm during Site clearance activities, and pollution to aquatic habitat because of contaminant runoff.

7.6.73 All ponds will be retained and protected throughout construction of the Scheme. Best practice pollution control measures will be implemented as outlined within the **oCEMP [EN010141/DR/7.3]** to safeguard aquatic habitats against contaminated runoff.

7.6.74 Habitats within the Site primarily comprise arable land of negligible value for amphibians. However, boundary habitats of hedgerows and rough grassland provide more favourable habitats. With the exception of the minor removal of hedgerow to facilitate the widening of existing field accesses, hedgerows would be retained and protected through the embedded design with minimum buffer distances of 6m. Furthermore, no permanent above ground infrastructure works are required within 50m of any other pond with known or assumed newt presence.

7.6.75 The **oCEMP [EN010141/DR/7.3]** includes best practice measures designed to ensure individual great crested newt are not affected, including fitting any excavations (e.g., cable trenches) with a means of escape to prevent entrapment.

7.6.76 Due to the risk to individual great crested newt, the **oCEMP [EN010141/DR/7.3]** includes the requirement to obtain a European Protected Species Mitigation Licence prior to onset of works within 250m of any with known or assumed great crested newt presence pond. Prior to granting any such licence, Natural England would need to be satisfied there is no overall detriment to great crested newt favourable conservation status.

7.6.77 The **oCEMP [EN010141/DR/7.3]** includes pre-construction surveys, species protection plans and RAMs in order to safeguard amphibians which will serve to minimise any risk of incidental harm to individual amphibians.

7.6.78 Due to the risk of harm to individual great crested newt associated with specific ponds identified as supporting this species the Scheme is considered to result in a minor adverse effect on great crested newt and other amphibian species of a medium sensitivity, which is not significant.

7.6.79 During operation of the Scheme the habitats within the Site will be enhanced for amphibians through the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha species diverse grassland and 17km of hedgerow which will offer enhanced foraging and refuge opportunities. This will have a minor beneficial effect on amphibian species.

Reptiles

7.6.80 Habitats within the site are predominantly sub-optimal for reptiles, comprising predominantly arable land, however discrete areas of the Site, including field margins and hedgerow bases, offer more suitable habitat.

Effects on Reptiles

7.6.81 Potential impacts to reptiles relate to the temporary loss of habitat during construction and incidental harm during Site clearance activities.

7.6.82 Habitats within the Site primarily comprise arable land of negligible value for reptiles, however boundary habitats of hedgerows and rough grassland provide more favourable habitats. With the exception of minor removal / widening required for access, hedgerows will be retained and protected through the embedded design with minimum buffer distances of 6m.

7.6.83 The **oCEMP [EN010141/DR/7.3]** sets out that species protection plans and RAMs must be provided in order to safeguard reptiles.

7.6.84 During operation of the Scheme the habitats within the Site will be enhanced for reptiles through the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]**, including over 205 ha of species diverse grassland and 17km of hedgerow which will offer enhanced foraging and refuge opportunities.

7.6.85 Given the implementation of embedded best practice avoidance and mitigation measures, construction of the Scheme is unlikely to have any discernible effect and result in negligible impacts upon on reptiles of low

sensitivity. Given the embedded implementation of the landscape proposals and the **oLEMP [EN010141/DR/7.7]** the Scheme will have a minor beneficial effect on reptiles for its lifetime.

Badgers

7.6.86 Evidence of badger was identified within the Site during the extended habitat surveys. Conclusive signs identified twenty-four setts, along with bedding, hair, prints and latrines within the Site. Six potential setts were also identified within the Site. Three setts were identified directly adjacent or within 30m of the Site boundary. Presence of setts, along with fresh latrines, prints and mammal paths within the Site, indicates that badgers are active in the area and regularly use the Site.

7.6.87 Full details of the surveys undertaken are contained within **ES Vol 2 Appendix 7-4: Badger Survey Report [EN010141/DR/6.2]**.

Effects on Badgers

7.6.88 An assessment of the potential effects of the Scheme on badgers is set out within **ES Vol 2 Appendix 7-4: Badger Survey Report [EN010141/DR/6.2]**.

7.6.89 Direct impacts to setts can largely be avoided with the implementation of embedded standoff zones from field boundary habitats. Works near one sett (S16), located underneath an access track requiring upgrades, would be undertaken in a sensitive manner, under RAMS and under a watching brief of a suitably experienced ecologist. Works near an additional sett (S21), located approximately 5m from a proposed access route which crosses a field boundary, would be micro-sited to avoid impacts. If impacts cannot be avoided, a licence will be obtained from Natural England prior to works commencing. Following a precautionary approach, it is considered that if necessary, the permanent or temporary closure (as appropriate) of these two setts would have no discernible impact on the local badger population due to their status as outlier setts.

7.6.90 All other setts are considered sufficiently distanced that no direct impacts would occur, and taking into account the baseline conditions and works proposed, it is considered unlikely that works would results in disturbance of a magnitude that would require a licence.

7.6.91 Given the integration of mammal gaps within perimeter fencing, no discernible impacts are anticipated during the operation of the Scheme, with proposed landscaping likely to improve foraging habitat for badger.

7.6.92 To ensure compliance with relevant legislation, a pre-construction survey will be undertaken prior to commencement of construction with appropriate avoidance, mitigation and, if required, licencing to be in place prior to commencement of works that may potentially affect a badger sett.

Otter

7.6.93 Watercourses, including the Pertenhall Brook, River Kym, South Brook and Duloe Brook, as well as their smaller tributaries, offer suitable habitat to support foraging and commuting otters. It is considered likely that otters are utilising watercourses located within and adjacent to the Site, including the River Kym, Pertenhall Brook and Duloe Brook, and may occasionally utilise smaller tributaries of these watercourses.

Effects on Otters

7.6.94 The embedded design includes buffers of at least 10m from all watercourses and ditches, with the exception of the following crossing points, as set out within Section 7.8 of **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]:**

- Three trenchless crossings;
- Nine trench crossings;
- two temporary bailey bridges;
- Three temporary culverts;
- One permanent culvert;
- Seven new permanent open-span crossings; and

- One culvert upgraded to a permanent open-span crossing.

7.6.95 Habitat suitable to support otter was found at multiple of these crossing points.

7.6.96 Trenchless crossings will require only short term and temporary works with no permanent above ground infrastructure remaining on completion. The two temporary bailey bridges and temporary culverts will be in place for the duration of construction only.

7.6.97 It is not considered the proposed temporary bailey bridges or open span crossing are of a sufficient scale or form to result in fragmentation of otter foraging and commuting habitats. Otter would readily pass through proposed structures, or utilise adjacent, unimpeded terrestrial habitats.

7.6.98 Any otters present in the immediate vicinity of the Site may be subject to disturbance as a result of construction noise. No works other than landscaping is proposed in proximity to the River Kym.

7.6.99 Works will be phased and therefore works in any one location are likely to be relatively short in duration. Temporary disturbance to otters for the duration of construction is considered to result in a minor adverse effect on otters of a medium sensitivity, which is not significant.

7.6.100 Eight open-span crossings and one permanent culvert will remain in place for the lifetime of the Scheme, all located along field ditches which offer less suitable habitat for otter, and likely to be used only infrequently. Open-span crossings are not considered to present a barrier to otter movement, while the single permanent culvert will be limited in width, consistent with those already present across the Site and so unlikely to present a barrier to otter.

7.6.101 Overall, it is considered the operation of the Scheme will result in negligible impacts to otter of medium value which is not significant.

Water Vole

7.6.102 While few ditches within the Site were considered to offer optimal habitat for water vole, watercourse and ditches present within and immediately adjacent to the Site do offer suitable habitat for the species.

Effects on Water Vole

7.6.103 No definitive evidence of water vole was identified during targeted surveys, however habitats suitable for water vole were identified at several locations on Site.

7.6.104 The embedded design includes buffers of at least 10m from all watercourses and ditches, with the exception of the crossing points set out previously in relation to effects on otters, and within Section 7.8 of **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].**

7.6.105 Trenchless crossings will require only short term and temporary works with no permanent above ground infrastructure remaining on completion. The two temporary bailey bridges and temporary culverts will be in place for the duration of construction only.

7.6.106 Trenchless crossings are not considered to affect water vole or their burrows. Furthermore, the proposed temporary bailey bridges will be sited on concrete footings located over 5m from the bank top and so unlikely to affect water vole burrows. Minor loss of vegetation might be expected under bailey bridges, but this is likely to be highly localised, insignificant and temporary.

7.6.107 The **oCEMP [EN010141/DR/7.3]** includes pre-construction surveys to be undertaken at watercourses potentially suitable for water vole to confirm presence or likely absence. Where water vole presence is identified, no works would be undertaken until a licence has been obtained from Natural England or the design is amended to avoid impacts.

7.6.108 Any works affecting habitat identified as suitable for water vole will be highly localised and will be undertaken following RAMs outlined within the **oCEMP [EN010141/DR/7.3]** to ensure no direct impacts to water vole.

7.6.109 Eight open-span crossings and one permanent culvert will remain in place for the lifetime of the scheme. Open-span crossings are not considered to present a barrier to water vole movement, while the single permanent culvert will be limited in width, consistent with those already present across the Site and so unlikely to present a barrier to water vole. The illustrative landscape proposals will enhance ditch top habitats for water vole, offering greater foraging and sheltering habitat for this species.

7.6.110 Overall, it is concluded that the Scheme will have negligible impacts upon water voles.

Hazel Dormouse

7.6.111 Arable habitats within the Site offer negligible suitable habitat for the species, however hedgerows offer habitat of greater suitability, particularly where connected to larger woodland blocks.

7.6.112 Areas of ancient woodland located outside of the Site likely offer suitable habitat to support this species, however such woodlands are small in size and sparsely located within the landscape reducing the likelihood of hazel dormouse presence.

7.6.113 Given the absence of recent records of the species, and largely suboptimal habitats within the Site and wider landscape, hazel dormouse are considered likely to be absent from the Site.

White-clawed Crayfish

7.6.114 During the extended habitat survey, several watercourses within and adjacent to the Site were considered suitable to support this species. Field ditch habitats which comprise the majority of watercourses within the site were found to offer negligible suitable habitat at surveyed crossing point locations,

being found to dry frequently and / or lacking the cobble bed material that is preferred by this species.

7.6.115 Given the absence of any recent records of the species and the rarity of white clawed crayfish it is considered reasonably unlikely that the species is present within the Site and immediately adjacent areas.

Other Notable Species

7.6.116 While targeted survey has not been undertaken, no evidence of notable arable flora (typically those requiring annual ground disturbance) was observed and it is considered that arable fields, which dominate the Site, are unlikely to support notable flora.

7.6.117 Watercourses located within and immediately adjacent to the Site may support notable fish species. Field ditches are considered to offer sub-optimal habitat for eels due to frequent drying.

7.6.118 Habitats within the Site are typical of lowland agricultural landscapes and are common and widespread both locally and nationally, and it is therefore considered likely that the Site supports a similarly common and widespread invertebrate assemblage, although it is acknowledged this may include some notable species.

7.6.119 The hedgerows, woodland, tree lines and grassland field margins within the Site provide the greatest opportunities for breeding, foraging and sheltering brown hare and hedgehog. Brown hares were frequently noted within the Site incidentally during surveys.

<u>Effects on Other Notable Species</u>

7.6.120 Boundary habitats will be largely retained and protected throughout construction with the embedded design including buffers of at least 6m, other than localised crossing and access locations. Any such localised works would be undertaken under RAMs outlined in the **oCEMP [EN010141/DR/7.3]**. Post-construction, seven crossing points, totalling 37m, will be reinstated.

7.6.121 During operation of the Scheme the habitats within the Site will be enhanced for invertebrates and notable mammals through the illustrative landscape proposals on **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3].**

7.6.122 Further, the operation of the Scheme will not require the application of herbicide and pesticide treatments as are frequently used as part of arable farmland systems, and that would likely continue to be used in the absence of the Scheme, and so benefit the floristic and insect diversity on Site.

7.6.123 Given the small scale and localised nature of the works, construction of the Scheme will have negligible impacts upon other notable species of medium sensitivity. During the operational phase, due to the implementation of the landscape proposals as well as the reduction in chemical insecticide use, the Scheme will have a minor beneficial effect on other notable species for the lifetime of the Scheme.

Summary

7.6.124 In summary, **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** has assessed the baseline ecological conditions and likely impacts of the Scheme.

7.6.125 The Scheme has been carefully designed with embedded mitigation and enhancement measures to avoid significant harm and to provide environmental benefits. Designated sites (internationally and locally designated) are safeguarded, and important habitats on site are largely retained and bolstered with new habitat features. Notable species groups – including birds, bats, water vole, otter, hazel dormouse, white-clawed crayfish, great crested newt, badger, reptiles, and invertebrates – have all been considered, with mitigation tailored to each.

7.6.126 The assessments find the Scheme will not result in any significant residual adverse effects upon ecological receptors.

Appraisal

7.6.127 The Scheme is compliant with national policy tests in NPS EN-1 and NPS EN-3, and in accordance with local planning policies. Further assessment of the Scheme's compliance with the relevent policies is provided in the Policy Compliance Document **[EN010141/DR/5.6].**

7.6.128 NPS EN-1 requires Applicants to assess impacts on designated sites, habitats and protected species (paragraph 5.4.17) and to avoid significant harm to biodiversity through careful design and mitigation, providing net enhancements where possible (paragraph 5.4.21). As set out in the above sections, these requirements have been met, as reported in **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].**

7.6.129 The Scheme has been appraised against local plan policies relevant to biodiversity and nature conservation within the **Policy Compliance Document [EN010141/DR/5.6]** and it is found to be in compliance.

7.6.130 In conclusion, having regard to the relevant national and local policies for biodiversity and nature conservation, and based on the findings of **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**, the Scheme is considered to be policy compliant. The application of the mitigation hierarchy and the commitment to habitat enhancement ensure that the Scheme will cause no significant ecological harm. On the contrary, it will secure long-term biodiversity benefits, leaving the Site and its surroundings with greater ecological value and resilience.

7.7 Habitats Regulations Assessment

Planning Policy Context

7.7.1 Under the Conservation of Habitats and Species Regulations 2017 (as amended), any plan or project which may have a likely significant effect on a European site must undergo a Habitats Regulations Assessment (HRA). This means a project such as the Scheme must be screened for likely significant

effects on any SPA or SAC in the vicinity, and if such effects cannot be ruled out, an Appropriate Assessment of implications for site integrity is required.

7.7.2 NPS EN-1 emphasises that internationally designated sites (SACs and SPAs) have the highest level of protection, and that an HRA must be undertaken for any development with potential to affect them (paragraph 5.4.4). Paragraph 5.4.49 confirms that the Secretary of State must consider whether a project may have a likely significant effect on any such internationally important site (either alone or in combination with other plans or projects), and if so, ensure an Appropriate Assessment is undertaken in line with the Habitats Regulations before consenting the project.

7.7.3 Paragraph 4.2.19 of NPS EN-1 confirms that if, after an Appropriate Assessment, a development would have residual adverse impact on the integrity of a site forming part of the UK National Site Network (the network of SACs, SPAs and equivalent sites), the Secretary of State should consider whether the project can proceed only by invoking a derogation under the Habitats Regulations.

7.7.4 NPS EN-3 provides further policy guidance on HRA in the context of renewable energy projects (including large-scale solar). NPS EN-3 is consistent with NPS EN-1 and re-emphasises that any potential effects on internationally important biodiversity sites must be addressed through the Habitats Regulations framework (paragraph 2.8.8).

7.7.5 The obligation to assess and protect internationally important sites is enshrined in legislation. The Conservation of Habitats and Species Regulations 2017 (as amended) (referred to as the Habitats Regulations) set out the legal framework for HRA in England and Wales. Regulation 63 of the 2017 Regulations requires that before any consent or authorisation can be given for a plan or project, the competent authority (Secretary of State) must determine whether the project is likely to have a significant effect on any European site, either alone or in combination with other plans or projects, and if so must undertake an appropriate assessment of the implications for that

site's conservation objectives. In the context of a Development Consent Order (DCO) application under the Planning Act 2008. The Secretary of State, as decision-maker, must carry out (or rely on) an Appropriate Assessment for any proposed development that could significantly affect a SAC, SPA or other Habitats site, based on the information provided by the applicant and relevant nature conservation bodies. Development consent may only be granted if the Secretary of State can ascertain, beyond reasonable scientific doubt, that the project will not adversely affect the integrity of any affected European site, or in exceptional cases, if the project satisfies the strict derogation tests set out in the Habitats Regulations.

7.7.6 Under the Habitats Regulations, a project which would have an adverse effect on the integrity of a European site can only be approved in derogation of the usual protection if all the following tests are met:

- **No alternative solutions**: There are no feasible alternative ways to deliver the project's objectives that would avoid harm to the projected site;
- **Imperative reasons of overriding public interest**: The project is justified by imperative reasons of overriding public interest (IROPI), which may include public health, public safety or important environment, social or economic benefits at a national level;
- **Compensatory measures**: Sufficient measures are secured to fully compensate for the damage to the Site, thereby ensuring the overall coherence of the network of protected sites is maintained.

7.7.7 In effect, if an NSIP proposal would harm an internationally important habitat and alternatives or mitigation cannot avoid that harm, consent cannot be granted unless the Secretary of State is satisfied that the scheme is of such overriding public importance that it should proceed, and that robust compensation will be put in place. This is a very high bar, intended to ensure that the integrity of Europe's most valued habitat sites is not undermined except in truly exceptional circumstances.

7.7.8 The HRA requirements operate alongside the Planning Act 2008 processes for NSIPs and the Environmental Impact Assessment (EIA) regime. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 also ensure that information on ecological impacts is available to decision-makers, and as such an applicant for a DCO must submit an Environmental Statement describing the likely significance effects on the environment. This EIA process considers effects on protected habitats and species (among others) and helps identify potential impacts on European sites. However, the HRA is a distinct legal assessment: compliance with the Habitats Regulations is a separate requirement that goes beyond general EIA ecology assessment. In effect the Habitat Regulations 2017 obligate the decision-maker to assess impacts on internationally important nature conservation sites and refuse or adjust the project unless it can be demonstrated to meet the HRA requirements.

Assessment Conclusions

7.7.9 The Applicant has prepared a report to inform the Secretary of State's Habitat Regulations Assessment at: **Information to Inform Habitats Regulations Assessment [EN0100141/DR/5.7]**. This section summarises its conclusions.

7.7.10 Only one designated European Site was identified for HRA screening based on proximity to the Site (taken as being within a search area of 10km, extended to 30km for bats) and/or their connectivity to the Site (e.g. ecological or hydrological connectivity). The scope of this was agreed with Natural England during pre-application consultation.

7.7.11 The site considered is the Eversden and Wimpole Woods Special Area of Conservation (SAC) which is located approximately 17.4 km south-east of the Order Limits and comprises a mixture of ancient coppice woodland (Eversden Wood) and high forest woods likely to be of more recent origin (Wimpole Woods). A colony of barbastelle bats is associated with the trees in Wimpole Woods. These trees are used as a summer maternity roost where the female bats gather to give birth and rear their young. Most of the roost sites are within

tree crevices. The bats also use the site as a foraging area. Some of the woodland is also used as a flight path when bats forage outside the site.

7.7.12 No records of barbastelle were returned by Bedfordshire and Luton Biodiversity Recording and Monitoring Centre within the 2km search area around the Site. Two records of barbastelle were returned by Cambridgeshire and Peterborough Environmental Records Centre, one from Little Paxton Woods in 2012 and the other from the River Great Ouse Corridor at St Neots in 2019. Neither record was located within the Site.

7.7.13 Detailed methodologies and results of bat activity surveys undertaken in support of the Scheme are presented in **ES Vol 2 Appendix 7-7: Bat Activity Survey Report [EN010141/DR/6.2]**.

7.7.14 Barbastelle were recorded within the Site across all survey areas. There was a peak in activity during August which then decreased in September before reaching broadly typical levels in October.

7.7.15 The Scheme is physically separated from Eversden and Wimpole Woods SAC by a distance of over 17km and as such no direct impacts to barbastelle or their roosting, foraging or commuting habitats within the SAC boundaries are anticipated. Similarly, by virtue of this separation distance no indirect impacts to supporting habitats within the SAC boundaries, such as through noise or lighting disturbance, air quality or hydrological impacts, are anticipated.

7.7.16 Barbastelle bat are however a mobile species and are likely to rely on habitats outside of the SAC boundaries for foraging, commuting and at other stages in their lifecycle, such as for hibernation, mating or when moving between roosts. Any modification on such supporting habitats could conceivably affect the favourable conservation status of bats associated with the SAC.

7.7.17 Barbastelle have a core sustenance zone (CSZ) of 6km, although may travel further. The Natural England Supplementary Advice on Conservation Objectives states that radio-tracking studies conducted at Eversden and

Wimpole Woods have shown bats traveling up to 11km a night to forage. As such, given the site is located beyond 17km away no impacts are located within this CSZ or known foraging range and as such no impacts to barbastelle foraging beyond the boundary of Eversden and Wimpole Woods are anticipated.

7.7.18 The species may however range further outside of the maternity period, particularly when dispersing to mating or hibernation sites, although UK specific literature is lacking on distances. Following European literature, it is assumed that the species typically ranges up to 40km, and as such the Site may lie within this dispersal range.

7.7.19 The **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]** includes measures to protect field boundary habitats, including hedgerows and watercourses. In addition, embedded mitigation measures are included to minimise light spill and noise impacts.

7.7.20 Extensive hedgerow planting is proposed to strengthen and enhance bat foraging and commuting routes within the Site and immediately surrounding landscapes. Therefore, considering the above measures the presence of the Scheme is not expected to have any negative effect on barbastelle.

7.7.21 The potential for LSE to occur to qualifying species features associated with Eversden and Wimpole Woods SAC has been screened out, and as such Appropriate Assessment (AA) is not required.

Appraisal

7.7.22 A HRA screening has been undertaken to determine whether the project might have any Likely Significant Effects on nearby European sites in the **Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7]**.

7.7.23 No Likely Significant Effects have been identified, and therefore AA is not required. The Scheme can therefore proceed without detriment to the protected integrity of any European site under the Habitats Regulations.

7.8 Biodiversity and Environmental Net Gain

Planning Policy Context

7.8.1 Biodiversity Net Gain (BNG) is not yet statutory for NSIPs (anticipated to be introduced in May 2026). However, NPS EN-1's guidance establishes an expectation that, where possible, energy infrastructure projects will deliver a net positive outcome for biodiversity.

7.8.2 NPS EN-1 sets out the principle of environmental net gain, defined as development that leaves the natural environment *"in a measurably better state than beforehand"* (paragraph 4.6.1). Within this, BNG is identified as an essential component – projects in England are expected to consider and seek to incorporate measures that improve natural capital and biodiversity (NPS EN-1 paragraph 4.6.2).

7.8.3 NPS EN-1 makes clear that BNG does not replace the need to first follow the mitigation hierarchy but should be pursued in addition to meeting existing obligations (paragraph 4.6.10).

7.8.4 Paragraph 4.6.7 of NPS EN-1 states that in England, applicants should use the latest version of the statutory biodiversity metric to calculate their biodiversity baseline and present planned BNG outcomes, and that this should be presented as part of the application.

7.8.5 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. Paragraph 2.10.89 of NPS EN-3 notes that solar farms have potential to increase a site's biodiversity value, especially on previously intensively-managed land, and that in some cases this can provide benefits and enhancements beyond what basic biodiversity net gain requires, resulting in wider environmental gains.

7.8.6 In Huntingdonshire, Policy LP30 requires applicants to follow the mitigation hierarchy, avoid and then minimise harm, and demonstrate "no net loss" and a net gain *"where possible,"* with large-scale schemes providing an audit of

losses and gains using a recognised methodology. In Bedford Borough, Policy 43 requires a net increase in biodiversity through on-site enhancement, habitat creation and strengthened ecological networks, complemented by Policy 35S which seeks a net gain in green infrastructure.

Assessment Conclusions

7.8.7 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.

7.8.8 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. However, as a result of failures of baseline ditch condition assessment criteria related principally to low water levels and frequent drying (which is outside the control of the Scheme), the bankside habitat enhancement is not taken as enhancing the condition of watercourses within the Metric. Therefore, whilst the Scheme achieves no net loss of watercourse units, the quantitative gain in the Metric does not achieve 10%. The Scheme proposals nonetheless represent a qualitative gain of value to local biodiversity.

7.8.9 Overall, it is concluded in the BNG Report **[EN010141/DR/7.17]** that the Scheme will deliver a net gain for biodiversity, and that the change in units generated as part of the Scheme are proportionate to the levels of impact, with the Scheme providing other qualitative measures to enhance biodiversity,

7.8.10 Measures relating to the creation, management and monitoring of habitats created and enhanced, as well as other biodiversity enhancement measures, are set out within the **oLEMP [EN010141/DR/7.7]**.

Appraisal

7.8.11 The Scheme has the potential to deliver substantial net gain in area-based habitats and hedgerow habitats, and no net loss in watercourse units.

7.8.12 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:

- 70% net gain in area-based habitat units;
- 30% net gain in hedgerow units; and
- 5% in watercourse units.

7.8.13 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.

7.8.14 There is currently no mandatory requirement for NSIPs to deliver a statutory BNG, and therefore the approach taken by the Applicant is found to be compliant with policy in NPSs EN-1 and NPS EN-3.

7.8.15 The Scheme has been appraised against local plan policies relevant to BNG within the **Policy Compliance Document [EN010141/DR/5.3]**.

7.8.16 The Scheme will leave biodiversity in a measurably better state, which is the cornerstone of both national and local policy.

7.9 Flood Risk and Drainage

Planning Policy Context

7.9.1 Overarching flood risk policy considerations are set out within Section 5.8 of NPS EN-1. The NPS sets out that the aim of planning policy on development and flood risk is to ensure that risks from all sources of flooding are taken into account, to avoid inappropriate development in areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding (paragraph 5.8.6). Where new energy infrastructure is, exceptionally, sited in a flood risk area, it must be made safe for its lifetime without increasing flood risk elsewhere (paragraph 5.8.7).

7.9.2 NPS EN-1 requires a risk-based, sequential approach to site selection. New projects should be steered to areas of lowest flood risk, avoiding Flood Zones 2 and 3 wherever feasible. If a development is to be located in a higher-risk flood zone, the Sequential Test must be applied to show there is no reasonably available site in a lower risk area (paragraph 5.8.21).

7.9.3 If the sequential test cannot deliver a reasonably acceptable site, then the Exception Test is required. The Exception Test requires applicants to demonstrate two elements: (i) that the development will provide wider sustainability benefits outweighing the flood risk, and (ii) that the development will be safe for its lifetime, considering the vulnerability of its users, without increasing flood risk elsewhere (paragraph 5.8.11). Both elements must be satisfied for consent.

7.9.4 NPS EN-1 mandates that a site-specific Flood Risk Assessment (FRA) be provided for all development in Flood Zones 2 or 3 (paragraph 5.8.13) to identify all forms of flooding to and from the development and how those risks will be managed, taking climate change into account (paragraph 5.8.14). The minimum requirements for a FRA are set out in detail at paragraph 5.8.15.

7.9.5 If there is potential for a proposed development to be at risk of flooding, NPS EN-1 requires applicants to consult the Environment Agency and Lead Local Flood Authority during the pre-application period (paragraph 5.8.18).

7.9.6 With regard to surface water and drainage, NPS EN-1 encourages the use of Sustainable Drainage Systems (SuDS) and natural flood management techniques wherever possible to manage surface water and ensure no increase in flood risk off-site (paragraph 5.8.27).

7.9.7 Paragraph 5.8.29 of NPS EN-1 states that a sequential approach should be applied to the layout and design of the development, with vulnerable infrastructure located on parts of the site at lower risk of flooding.

7.9.8 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS states that where a FRA has been carried out, it must be submitted alongside the ES (paragraph 2.10.86).

7.9.9 Policy LP 5 ‘Flood Risk’ is the principal policy on flood risk within the Huntingdonshire Local Plan to 2036 and broadly mirrors the requirements set out in national policy and guidance. It confirms that development should follow the sequential approach to determining the suitability of land for development, directing development to areas of lowest risk of flooding, and where necessary apply the exception test. Policy LP 5 also identifies that a proposal will only be supported where all forms of flood risk have been addressed. It goes on to identify that where a proposal is considered to be acceptable within the 1% annual probability flood extent (Flood Zone 3), including an allowance for climate change for the lifetime of the development, the development must not result in a loss of flood storage capacity, reduce flow performance, increase rate of flooding onset or result in an unsustainable form of flood storage requiring on-going silt removal, maintenance or renewal. Finally, it states that proposed sites at risk of flooding from any form, where there are critical drainage problems or on site of 1 hectare or more will only be supported if a site-specific flood risk assessment has been produced. Policy LP 15 ‘Surface Water’ is also of relevance as it sets out the Council’s

approach in relation to the management of surface water in a sustainable manner. It states that a development should consider surface water management from the outset as an integral part of the design process and incorporate SuDS.

7.9.10 Policy 92 'Flood Risk' is the principal policy on flood risk within the Bedford Borough Local Plan 2030. This policy states that in considering new development, water management and flood risk must be addressed. Policy 93 'Sustainable Drainage Systems' states that all development proposals must incorporate surface water drainage systems appropriate to the nature of the site. Post-development runoff rates should aim to achieve greenfield equivalents. It also outlines the drainage priority in order of discharge locations. Policy 50S 'Water Resources' is also of relevance as is seeks to protect the quality, quantity and flow of both ground and surface water.

Assessment Conclusions

7.9.11 **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]** sets out the Applicant's full assessment of flood risk and drainage for the Scheme, identifying any likely significant effects. The chapter is supported by the mandatory flood risk assessment (FRA) at **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**, which should be read in conjunction with the **outline Surface Water Management Plan (oSWMP) [EN010141/DR/7.13]**. This section of the Planning Statement contains only a brief summary of the likely impacts and effects.

Approach

7.9.12 The baseline hydrology, hydrogeology and geology relating to the Scheme have been assessed through a combination of desk-based studies, site walkovers, surveys and consultation.

7.9.13 The EA's Flood Zones from the Flood Map for Planning have been reviewed to assess the risk of fluvial flooding to the Site. The flood maps indicate flood risks associated with undefended events, i.e., the possibility of fluvial or tidal

flooding without considering reductions in risk of flooding due to the presence of flood defence structures. This indicates that sections of the Site are located within Flood Zones 2 and 3.

7.9.14 The EA's Risk of Flooding from Surface Water (RoFSW) mapping was also reviewed and indicates that parts of the Site are at low to high risk of surface water flooding.

7.9.15 A more detailed assessment of the fluvial flood risks was carried out using the existing 1D/2D Lower Ouse River Kym Catchment Model and Lower Great Ouse Model for smaller watercourses, which was received from the EA in May 2025. The model data confirmed the fluvial flood risks to sections of the Site, and that the critical infrastructure is located outside Flood Zones 2 and 3.

7.9.16 The EA's risk of flooding from rivers and the sea (RoFRS) and risk of flooding from surface water (RoFSW) online flood maps, including climate change scenarios, were reviewed to assess flood risk over the 40-year design life of the Scheme. The RoFRS and RoFSW climate change maps represent a central estimate of future flood risk by applying moderate climate change allowances for the Ouse Upper and Bedford Management Catchment, which covers the Site.

7.9.17 Furthermore, a Sequential Test is undertaken, followed by the Exception Test, in line within NPS EN-1.

Design and Mitigation Measures

7.9.18 Following the selection of the Site (as set out in **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]**), the Scheme has followed the mitigation hierarchy to address flood risk and drainage effects.

7.9.19 The Scheme includes a number of buffers that are embedded into the layout, which includes a minimum 10m buffer between the fence line of the solar farm and watercourses. **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3]** incorporates this buffer to illustrate how the Scheme is likely to come forward.

7.9.20 All critical infrastructure (watercourse crossings aside) is proposed to be located outside of Flood Zones 2 & 3 (fluvial flood zones for planning), see **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2].** Where it has been essential to locate solar arrays within areas at risk of pluvial flooding to maintain the required generating capacity of the Scheme, they will be installed such that the underside of the panels will be above the maximum predicted flood levels, with only supporting legs of the mounting tables within the flood extent which would have a negligible impact.

7.9.21 Panels will be designed to be set above the pluvial flood level. The maximum height of the panels along the top (northern) edge of the array will be 3m above existing ground levels. The minimum height along the bottom (southern) edge of the array will be at least 0.8m above the existing ground levels. Furthermore, the panel bottom edges will be set a minimum of 200mm above the maximum surface water levels for the design, i.e. the 1.0% climate change event

7.9.22 SuDS features have been incorporated into the design to control surface water runoff from these features to greenfield rates. The **oSWMP [EN010141/DR/7.13]** details the principles of runoff control for the Scheme.

7.9.23 The Scheme would be developed in phases wherever possible with surface water run-off initially managed through a range of sediment treatment measures and temporary SuDS to reduce the run-off rate and volume of discharge to the local drainage network.

7.9.24 Temporary drainage pathways would be established to direct surface water away from at risk areas and towards the surface water drainage network via sediment controls. The aim of the drainage scheme would be to ensure that water from surrounding land is excluded from the area of development and where this is not possible the volumes draining onto the Site are significantly reduced. There will be no unapproved discharge of foul or contaminated drainage from the Site either to groundwater or any surface waters, whether direct or via a soakaway.

7.9.25 Clay plugs would be inserted within cable trenches at a frequency to suit the specific location to prevent gullying of trenches and preferential routing.

7.9.26 A programme of surface water quality monitoring would be undertaken before and during the construction phase to provide assurance as to the absence of water quality impacts.

7.9.27 Furthermore, temporary land take areas (construction compound with car parking, temporary storage areas, welfare facilities etc.) will be fully reinstated following the construction period to reduce areas of semi-impermeable surfaces. Temporary land take areas will be re-graded with soil to a natural profile (where required) and re-vegetated.

7.9.28 The design of new watercourse crossings is discussed within **ES Volume 2 Appendix 8-3: Watercourse Crossing Assessment [EN010141/DR/6.2]**. The cross-sectional area of crossings (whether culverts or open-span structures) will be sized at the detailed design stage, according to appropriately modelled storm flows for the upstream catchments, selected based upon the vulnerability of potential receptors.

7.9.29 The potential impact on the water quality of the sub catchments draining the construction area, will be mitigated through the implementation of the **oSWMP [EN010141/DR/7.13]**. The oSWMP includes sections dealing with pollution prevention measures, water quality monitoring and procedures in the event of an accidental spillage.

7.9.30 In addition, as set out in the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**, during construction a range of standard best-practice measures will mitigate drainage and water pollution risks.

Assessment Findings

7.9.31 Though very small areas of the Site within the Order Limits are located within fluvial Flood Zones 2 and 3, all critical infrastructure has been sequentially

located in areas at the lowest possible risk of fluvial flooding, i.e., in Flood Zone 1.

7.9.32 Small areas of solar arrays are within pluvial flood zones according to national scale pluvial flood mapping. However, it is proposed that all panels are elevated above predicted flood levels, including a 200 mm freeboard, on piled supports. This will allow flow under the panels, maintaining the overland flow routes similar to predevelopment conditions, as the supports will offer negligible flow obstruction.

7.9.33 To manage the risk of surface water flooding across the Site and to ensure that runoff rates are not increased, which could affect both on and off-site flooding, an **outline Surface Water Management Plan [EN010141/DR/7.13]** has been developed. The oSWMP will ensure a neutral or beneficial effect on on-site and third-party surface water flood risks.

7.9.34 The Scheme is not at risk of flooding from reservoir failure events and is at low risk of flooding from groundwater based on the available borehole records and its geology.

7.9.35 **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]** concludes that with the design and mitigation measures in place, the Scheme would not present an unacceptable flood risk to people or property and would not increase flood risk off-site for any nearby areas or receptors. There would be no significant adverse effects on flood risk, drainage, or surface water quality in any phase (construction, operation, or decommissioning) of the Scheme.

Sequential Test

7.9.36 A Sequential Test has been undertaken and is reported in **ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]** and set out in greater detail within the supporting appendices to ES Chapter 3, specifically **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]**. The Sequential Test has considered the specific requirements of the Scheme –

including the need for a large, contiguous site, appropriate topography, proximity to a viable grid connection point, and land availability.

7.9.37 This report demonstrates that when taking into account wider sustainable objectives, there are compelling reasons that there are no alternative sites in areas of lower flood risk that are suitable for the type of development proposed, able to meet the same development needs and that have a reasonable prospect of being developed at the same time as the proposal.

7.9.38 The Applicant's assessment confirms that the chosen Site meets the requirements of the Sequential Test and on this basis, national and local policy allow the project to be considered in Flood Zone 3, subject to the Exception Test.

Exception Test

7.9.39 An exception test has been carried out because part of the Scheme falls within Zone 3 and the use is classified as *"Essential Infrastructure"* within Annex 3 of the NPPF.

7.9.40 As set out within Section 2.0 of this Planning Statement, there is an urgent need for new renewable electricity generating capacity to meet our energy objectives, transition to net zero, and meet our statutory carbon budgets. This is manifest most notably in section 3.2.6 of NPS EN-1 where it is confirmed that the Secretary of State should assess all development covered by the NPS on the basis that the government has demonstrated there is need for it which is urgent, and that substantial weight should be given for this need.

7.9.41 Section 2.0 of this Planning Statement provides further detail on legislative and government policy in relation to the need for additional renewable energy capacity. The development would provide a significant supply of renewable energy to the District Network, and potentially directly to industry via private wire. Consequently, the wider sustainability benefits that outweigh the flood risk have been appropriately demonstrated. Nonetheless, it remains a prerequisite on applicants to ensure that new energy infrastructure is

designed to ensure it can remain operational and will be safe for its lifetime and will not increase flood risk elsewhere (NPS EN-1 paragraph 5.8.7 and NPS EN-3 paragraph 2.4.11).

7.9.42 The Scheme has been designed to ensure that all critical infrastructure is sited in areas at the lowest risk of flooding (i.e., within Flood Zone 1). Furthermore, as demonstrated within **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]** and **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**, the Scheme would remain operational and safe in times of flooding, without increasing flood risk elsewhere.

7.9.43 As set out above, the potential vulnerability of the Scheme is laid out within the Flood Risk Vulnerability Classification set out in Annex 3 of the NPPF, and there are no 'users' of the development per se. This confirms that solar farms are essential infrastructure. Table 2 of the government Flood Risk and Classification guidance (paragraph 079), confirms that for essential infrastructure in Flood Zone 3a the exception test is required in so far as it should be designed and constructed to remain operational and safe in times of flooding.

7.9.44 This prerequisite for essential infrastructure is demonstrated above, and accordingly the development is considered to have passed the requirements of the Exception Test.

Appraisal

7.9.45 In summary, the Sequential Test has been satisfied (no preferable site at lower risk exists) and the Exception Test is passed, with the FRA showing that the Scheme's benefits outweigh the flood risk and that it will be safe and not worsen flooding elsewhere. This outcome aligns with NPS EN-1 paragraphs 5.8.9–5.8.11, meaning the Scheme location is justified in flood risk terms.

7.9.46 An appropriate FRA has been prepared in accordance with paragraphs 5.8.13-15 of NPS EN-1, and the Applicant has consulted with the Environment

Agency and Lead Local Flood Authority (LLFA) throughout the pre-application period in accordance with paragraph 5.8.18 of NPS EN-1.

7.9.47 Furthermore, the Scheme has incorporated SuDS in accordance with paragraph 5.8.27 of NPS EN-1 to minimise the risk of surface water flooding and ensure that there is in increase in flood risk off-site.

7.9.48 A sequential approach has been taken to the layout of the Scheme to ensure that all critical infrastructure is sited in areas of least flood risk (i.e. Flood Zones 2 and 3), in accordance with paragraph 5.8.29 of NPS EN-1. Where it has been essential to locate solar arrays within areas at risk, they will be installed such that the underside of the panels will be above the maximum predicted flood levels to withstand flood conditions and avoid flood impacts.

7.9.49 The Scheme has been appraised against local plan policies relevant to flood risk and drainage within the **Policy Compliance Document [EN010141/DR/5.3]** and it is found to be wholly in compliance.

7.9.50 In conclusion, the Scheme can be regarded as fully in compliance with relevant flood risk and drainage policies. It accords with NPS EN-1 and NPS EN-3 by ensuring flood risks are effectively managed and mitigated, and it meets all requirements of local plan policy by not increasing flood risk and by employing sustainable drainage methods. The Scheme therefore carries no policy conflicts in respect of flood risk and drainage.

7.10 Water Quality and Resources

Planning Policy Context

7.10.1 Overarching water quality and resources policy considerations are set out within Section 5.16 of NPS EN-1. The NPS paragraph 5.16.2 notes that during construction, operation and decommissioning, projects may lead to greater water use, involve discharges to water, and cause adverse ecological effects from changes to the water environment, with a risk of spills or pollution incidents. Where a project is likely to affect the water environment, NPS EN-

1 paragraph 5.16.3 requires the applicant's ES to assess the existing status of water quality and resources and the project's impacts on them.

7.10.2 Paragraph 5.16.7 of NPS EN-1 specifies that the ES should describe the quality of affected waters, existing water resource uses (including abstractions) and any changes, physical characteristics of water bodies, WFD-protected areas, and how climate change could influence these factors.

7.10.3 Applicants are encouraged to manage surface water during construction by treating surface water run-off prior to discharging (NPS EN-1 paragraph 5.16.5).

7.10.4 For decision-making, NPS EN-1 paragraph 5.16.12 states that no project should undermine WFD objectives and directs the Secretary of State to give greater weight to impacts that risk a water body failing to meet good status.

7.10.5 Paragraph 5.16.14 of NPS EN-1 requires the Secretary of State to be satisfied the development complies with River Basin Management Plans and the Water Environment (WFD) Regulations 2017 – development consent should be refused if a scheme would cause deterioration of a water body's status or prevent it reaching good status, unless the stringent tests in the WFD regulations are met.

7.10.6 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS emphasises that solar development generally has a limited impact on drainage, since panels drain to the ground (paragraph 2.10.84). Paragraph 2.10.84 encourages the use of permeable access tracks and SuDS to control any localised run-off increase.

7.10.7 Paragraph 2.10.86 of NPS EN-3 directs that solar farm be configures to avoid impacts on existing drainage and watercourses , given their temporary nature. To this end, paragraph 2.10.87 of NPS EN-3 states that culverting of watercourses should be avoided or minimised to temporary works only if absolutely necessary for construction access (paragraph 2.10.88).

Assessment Conclusions

7.10.8 **ES Vol 1 Chapter 9: Hydrology and Flood Risk [EN010141/DR/6.1]** sets out the Applicant's assessment of water quality and resources for the Scheme, identifying any likely significant effects. The chapter is supported **ES Vol 2 Appendix 8-2: Water Framework Directive Assessment [EN010141/DR/6.2]** which is a standalone assessment within the ES examining compliance with WFD objectives. This section of the Planning Statement contains only a brief summary of the likely impacts and effects.

Design and Mitigation Measures

7.10.9 The Applicant has followed the mitigation hierarchy to prevent harm to the water environment where possible, with mitigation measures set out in full within Section 8.7 of **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]**.

7.10.10 The layout of the solar arrays and infrastructure has been developed to avoid sensitive hydrological areas and incorporate wide buffers to watercourses and ditches through the Site apart from where absolutely necessary for construction access and cabling. The number of watercourse crossings for vehicles and cables has been minimised; where crossings are unavoidable, the design uses clear-span bridges so that the water flow is uninterrupted and no culvert constriction occurs.

7.10.11 In terms of water resources, as set out in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**, the Scheme would not require abstraction and will utilise mains water or brought-in water for construction and operational needs, thereby avoiding drawing from local rivers or aquifers.

7.10.12 An **outline Construction Environmental Management Plan [EN010141/DR/7.3]** has been prepared, outlining specific pollution prevention and response measures to be implemented by the contractor. This includes measures such as silt traps, on-site speed limits (to prevent dust and soil track-out), and emergency response procedures if a spill occurs.

7.10.13 A separate **outline Operational Environmental Management Plan [EN010141/DR/7.5]** will ensure ongoing maintenance measures, like regular inspection and maintenance of the SuDS drainage system and watercourse crossings (to promptly clear any debris and ensure effective drainage).

7.10.14 An **outline Surface Water Management Plan [EN010141/DR/7.13]** sets out how surface water will be managed across the Site.

7.10.15 An **outline Battery Safety Management Plan [EN010141/DR/7.10]** sets out measures that will be implemented for the BESS compound to ensure that should a fire or major incident occur, any contaminated pollution run-off would be contained to a lagoon to prevent discharge to nearby watercourses.

Assessment

7.10.16 **ES Vol 2 Appendix 8-2: Water Framework Directive Assessment [EN010141/DR/6.2]** identifies the relevant water bodies and evaluates the Scheme against WFD objectives.

7.10.17 The Site lies entirely within the Anglian River Basin District, within the Ouse Upper and Bedford Management Catchment.

7.10.18 The Site drains to four separate WFD water bodies. These water bodies are:

- Pertenhall Brook;
- Colmworth Brook;
- Duloe Brook; and
- River Kym.

7.10.19 The WFD Assessment has considered potential changes to hydromorphology, water chemistry, and ecology that the project could cause. The assessment concludes that with the embedded design and mitigation measures outlined above, the residual effect on the status of all relevant WFD parameters is negligible, equating to no impact on the overall water body status objectives.

Appraisal

7.10.20 The Applicant's approach to managing water quality and resources is consistent with national policy contained within NPS EN-1 and NPS EN-3, as well as local planning policies.

7.10.21 The Applicant has fully assessed the water environment baseline and impacts in the ES, satisfying the requirement for a thorough assessment, as required by NPS EN-1 paragraph 5.16.3 and 5.16.7.

7.10.22 The submitted **ES Vol 2 Appendix 8-2: Water Framework Directive Assessment [EN010141/DR/6.2]** demonstrates that the Scheme will not cause deterioration of any water body status nor prevent the achievement of good status in the future. This ensures compliance with the WFD Regulations 2017, satisfying the tests in NPS EN-1 paragraphs 5.6.12 and 5.16.14.

7.10.23 The Applicant has committed to only installing open-span crossings (rather than culverts) as per paragraph 2.10.87 of NPS EN-3 for all watercourse crossings within the Site apart from the main site access into Site D, to avoid restricting flows or fragmenting the existing drainage network.

7.10.24 The Scheme has been appraised against local plan policies relevant to water quality and resources within the Policy Compliance Document [EN010141/DR/5.4].

7.10.25 In conclusion, having regard to the relevant national and local policies on water quality and resources, and based on the findings of **ES Vol 2 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]**, the Scheme is considered to be policy compliant.

7.11 Traffic and Transport

Planning Policy Context

7.11.1 Overarching policy considerations relevant to traffic and transport are set out in Section 5.14 of NPS EN-1.

7.11.2 NPS EN-1 requires a transport assessment be undertaken for projects likely to have significant transport implications (paragraph 5.14.5). Applicants are expected to consult with the relevant highway authorities (National Highways and the local highway authority) on the assessment and proposed mitigation measures (paragraph 5.14.6). The assessment should consider potential disruptions to existing transport networks and infrastructure (paragraph 5.14.8).

7.11.3 NPS EN-1 requires the preparation of a travel plan with demand management measures to reduce impacts, including promoting sustainable transport modes for workers and deliveries (paragraph 5.14.7).

7.11.4 Where impacts cannot be avoided, NPS EN-1 calls for mitigation measures such as consolidating trips, routing and timing deliveries to avoid peak hours, and modal shift where feasible (paragraphs 5.14.11–5.14.13).

7.11.5 Paragraph 5.14.21 states that the Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative effects on the road network would be severe, or if the applicant does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.

7.11.6 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS acknowledges that the construction phase of solar farms is likely to give rise to greater impacts than the operational phase (paragraph 2.10.35).

7.11.7 Paragraph 2.10.39 of NPS EN-3 states that applicants should include the full extent of the access routes necessary for operation and maintenance of the development, along with an assessment of the effects.

7.11.8 NPS EN-3 sets out that applicants should assess alternative routes for delivering construction materials and equipment and choose the most appropriate route to minimise local impacts (para. 2.10.123). If the source of

materials is uncertain, a reasonable worst-case traffic scenario should be evaluated (paragraph 2.10.124). Applicants must ensure the capacity of roads and bridges on the chosen route is sufficient for the size / weight of loads, identifying any required upgrades in their assessment (paragraph 2.10.125).

7.11.9 Where multiple developments in the area around a proposed site could generate cumulative construction traffic (for example, using the same access routes), NPS EN-3 expects a cumulative transport assessment to be undertaken (paragraph 2.10.126). This should consider combined movements from the Scheme and other projects, in consultation with local highways authorities if appropriate.

7.11.10 Policy 31 'The impact of development – access impacts' of the Bedford Borough Local Plan 2030 sets out that development proposals should not have any significant adverse impact on access to the public highway and should give consideration to highway capacity, parking provision, safety or general disturbance, accessibility by non-car modes and the suitability of access arrangements. It goes on to state that developers will be required to implement or contribute towards measures to mitigate adverse impacts. Policy 57 'Renewable energy – general impact' and Policy 88 'Impact of transport on people, places and environment' also require proposals to address traffic and access impacts. Policy 91 'Access to the countryside' seeks to protect the public rights of way network.

7.11.11 There are also several policies of relevance within the Huntingdonshire Local Plan to 2036, including Policy LP 16 'Sustainable Travel' which requires proposals to assess transport impact and support the use of sustainable travel modes, and Policy LP 17 'Parking Provision and Vehicle Movement' which requires development to provide appropriate space for vehicle movements, facilitate accessibility for service and emergency vehicles, and incorporate adequate parking for vehicles and cyclists.

7.11.12 Policy GSNP 17 'Road Safety and Parking' of the Great Staughton Neighbourhood Plan reflects the local policies identified above, and sets out

that where proposals are likely to unacceptably impact adversely on road safety, including the safety hotspots identified within Great Staughton, they will be expected to mitigate their impact by providing or contributing towards road safety measures.

Assessment Conclusions

Approach

7.11.13 **ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1]** presents the findings of an assessment of the likely significant highways and transport-related environmental effects as a result of the Scheme.

7.11.14 Detailed highways and transport operational analysis work, including the identification of development trip generation, a review of highway safety, the site accessibility, and the likely maximum trip generation during the construction period have been considered in a formal Transport Assessment, which is provided as **ES Vol 2 Appendix 9-1: Transport Assessment (TA) [EN010141/DR/6.2]**. In addition, an **outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]** has been prepared for the construction phase.

Design and Mitigation Measures

7.11.15 The Applicant has followed the mitigation hierarchy to prevent highway impacts where possible, with mitigation measures set out within the **TA [EN010141/DR/6.2]** and **oCTMP [EN010141/DR/7.4]**.

7.11.16 The primary avoidance mitigation measures are through scheme design and traffic routing, with construction traffic routed to avoid vehicles using the public highway as much as practicable, with particular focus on avoiding the need to pass through villages.

7.11.17 To further mitigate and reduce the number of vehicle trips, the **oCTMP [EN010141/DR/7.4]** sets out measures to encourage and facilitate car sharing among construction workers, and during periods of maximum construction

activity, identifies that the number of staff vehicle trips could be further reduced through the provision of minibuses to transport staff to the Site from nearby transport hubs. To reduce the potential impact of HGV deliveries, the arrival and departure times will be managed to minimise the number of HGVs travelling to and from the Site during the highway peak hours.

7.11.18 Management of PRoWs will involve the use of mesh fencing or Heras fencing as appropriate, in order to clearly demarcate and separate PRoWs from construction traffic and activities. Where necessary, banksmen would be utilised. A limited number of temporary, localised PRoW diversions will be required during the construction phase, primarily in relation to the trenching of cables across PRoW. Any diversion will be highly localised and for a limited period of time. An **outline Public Rights of Way Management Plan [EN010141/DR/7.8]** has been prepared as part of the application for development consent. This document sets out the principles by which PRoW will be managed during the construction and operation phases.

7.11.19 An **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** has been prepared which details management and mitigation measures and sets out the general principles to be followed during the operation of the Scheme, which would be agreed with the relevant authorities in advance of the commencement of operation. This includes measures related to the movement and storage of maintenance vehicles within the Site during the operational phase.

7.11.20 Furthermore, an **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6]** has been prepared as part of the application for development consent. It is expected that the principles agreed to minimise the impact of development-related traffic during the construction phase will be reviewed and applied during decommissioning.

Assessment

7.11.21 With the incorporation of the embedded mitigation measures set out above, the **TA [EN010141/DR/6.2]** concludes that there would be no significant residual adverse traffic or highway safety effects.

7.11.22 The **TA [EN010141/DR/6.2]** includes a cumulative impact assessment, to take into account a number of committed developments which would potentially create additional traffic on the local highway network within the study area during the construction phase of the Scheme. These include the development of the proposed High Wood Solar, Cobholden Solar and Cobholden BESS development sites. The impact of cumulative development traffic does not result in any significant additional increases in the number of HGV trips on the local highway network.

Appraisal

7.11.23 The Applicant's approach to traffic and transport impacts is consistent with national policy contained within NPS EN-1 and NPS EN-3, as well as local planning policies.

7.11.24 The Applicant has prepared a **TA [EN010141/DR/6.2]** and **oCTMP [EN010141/DR/7.4]**, in line with EN-1's expectation that significant transport implications be assessed and mitigation identified (paragraph 5.14.5), and this has been based on consultation throughout with both National Highways and the Local Highway Authorities (BBC and CCC) in accordance with paragraph 5.14.6 of NPS EN-1. The TA includes an assessment of cumulative construction traffic impacts as required by paragraph 2.10.126 of NPS EN-3.

7.11.25 The findings of the TA are that the Scheme would result in no unacceptable impacts on highway safety, and there would be no severe residual cumulative effects on the highway network. Therefore, in accordance with paragraph 5.14.21 of NPS EN-1 there is no reason for the Secretary of State to refuse the Scheme on highway grounds.

7.11.26 The Scheme has been appraised against local plan policies relevant to traffic and transport impacts within the **Policy Compliance Document [EN010141/DR/5.4]** and it is found to be in compliance with all policies.

7.11.27 In conclusion, having regard to the relevant national and local policies on traffic and transport impacts, and based on the findings of the **TA [EN010141/DR/6.2]**, the Scheme is considered to be policy compliant.

7.12 Noise and Vibration

Planning Policy Context

7.12.1 Overarching noise and vibration policy considerations are set out within Section 5.12 of NPS EN-1. Where a development is likely to cause noise impacts, NPS EN-1 requires a detailed noise assessment covering the noise generating aspects of the proposal, the existing baseline noise environment, sensitive receptors, predicted changes in noise during construction and operation (day and night), and an assessment of effects on health and quality of life (paragraph 5.12.6).

7.12.2 NPS EN-1 sets out that the nature and extent of noise assessment for development should be proportionate to the likely noise impact of a development (paragraph 5.12.7) and include as part of this a consideration of ancillary activities such as construction traffic (paragraph 5.12.8).

7.12.3 NPS EN-1 states that a development should not be granted consent unless it meets three aims (paragraph 5.12.17):

- avoid significant adverse noise impacts on health and quality of life;
- mitigate and minimise other adverse impacts; and
- where possible, contribute to improvements in health and quality of life.

7.12.4 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS provides limited further policy in relation to noise and vibration impacts but does state at paragraph 2.10.162 that no more than

limited weight is likely to be given to noise and vibration impacts arising from traffic and transport during the operational phase of a project.

7.12.5 Policy 32 'The impact of development – disturbance and pollution impacts' of the Bedford Borough Local Plan 2030 identifies that the impact of development proposals should ensure they minimise and take account of the effects of noise likely to be generated by the development. Policy 47S 'Pollution, disturbance and contaminated land' also states that all development proposals will be required to avoid noise giving rise to significant adverse impacts on health and quality of life or, where appropriate, mitigate and reduce its impact. In addition, Policy 57 'Renewable energy – general impact' requires all proposals for solar energy schemes to consider amenity noise impacts.

7.12.6 Policy LP 10 'The Countryside' of the Huntingdonshire Local Plan to 2036 requires all development in the countryside to not give rise to noise that would adversely affect the use and enjoyment of the countryside by others, Policy LP 14 'Amenity' also requires proposals to ensure that predicted adverse noise impacts would be acceptable and Policy LP 35 'Renewable and Low Carbon Energy' requires proposals to identify any adverse impacts on amenity.

Assessment Conclusions

7.12.7 **ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]** sets out the Applicant's assessment of the likely significant environmental effects of the Scheme with regard to noise and vibration.

Approach

7.12.8 Noise and vibration levels are assessed during the construction (and decommissioning) and operational phases of the Scheme. Relevant and appropriate noise and vibration guidance and standards have been used to determine the impact.

7.12.9 Assumptions have been made in respect of the design noise levels for the associated plant and design options considered for plant locations.

7.12.10 To establish any likely impact from noise, a robust assessment of baseline sound levels has been considered by undertaking fixed position noise monitoring at twenty-two Nearest Sensitive Receptors (NSRs) areas around the Site. This was carried out over three weekend periods in March, May and June 2024 to establish the lowest likely representative background levels.

7.12.11 In accordance with appropriate standards, best practical means would be employed to control the noise generation during the construction and decommissioning period. The assessment provides mitigation measures which are set out in the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**, the **outline Operational Environmental Management Plan [EN010141/DR/7.5]**, and the **outline Decommissioning Environmental Management Plan [EN010141/DR/7.6]** which are secured by Requirements of the **draft DCO [EN010141/DR/3.1]**.

7.12.12 For the purposes of the assessment, noise limits have been identified in relation to specific NSR against which the assessment is undertaken. The limits are based upon the results of baseline sound monitoring and are set at a level that would ensure (in accordance with relevant policy and guidance) that no significant effects would occur as a consequence of the Scheme.

Design and Mitigation Measures

7.12.13 The Applicant has followed the mitigation hierarchy to prevent noise and vibration impacts. To avoid impacts, embedded design measures include the careful layout of infrastructure – for instance, the noisier elements (inverters, the BESS compound, and the on-site substation) are sited as far as practicable or required from sensitive receptors.

7.12.14 During construction, a suite of mitigation measures are set out in the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**. The **oCEMP [EN010141/DR/7.3]** includes for

established best practice measures (such as BS 5228) to control noise and vibration. For example, the contractor will be required to maintain plant in good working order (to prevent excessive noise) and where practicable use equipment fitted with silencers or acoustic hoods.

7.12.15 Construction traffic will be managed through the **outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4]**, which includes a construction traffic access strategy designed to avoid vehicles using the public highway as much as possible, and avoiding large volumes of traffic from passing through Great Staughton.

7.12.16 The **outline Operational Environmental Management Plan [EN010141/DR/7.5]** sets out measures to mitigate for the noise impacts of the development during the operational phase.

Assessment

7.12.17 With the above mitigation measures in place, the residual noise and vibration effects of the Scheme are assessed to be not significant.

7.12.18 Noise levels would vary throughout the construction phase and would depend on the particular work being undertaken. The highest noise levels are likely to be created during site preparation, piling, infrastructure activities and the PV installation. At all residential NSRs, this level of noise would be within the BS5228 threshold values.

7.12.19 The levels of noise as a result of construction in EIA terms would range between negligible to slight adverse impact and a negligible to minor effect at residential receptors, and negligible to slight adverse impact and neutral to minor level effect on Public Rights of Way, both of which are not significant. In addition, the impact assessment for NSR is shown to be negligible to slight adverse at all receptors (which are of high sensitivity) on local roads, this effect would be neutral to minor and not significant**.**

7.12.20 Noise impacts during construction would be temporary and any short-lived noise events would be managed using best practicable means in accordance with the **oCEMP [EN010141/DR/7.3]** and **oCTMP [EN010141/DR/7.4]**.

7.12.21 During operation, the Scheme has been designed such that no significant adverse effects occur. The final operational noise levels are predicted to be very low at receptors, so the residual operational impact is neutral.

7.12.22 **ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]** concludes that the Scheme has been designed to operate such that it complies with all appropriate and relevant noise standards and guidance.

Appraisal

7.12.23 The Scheme has been designed such that it is consistent with all national policy and guidance, according with the requirements of NPS EN-1 regarding noise control.

7.12.24 **ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]** demonstrates that:

i) Significant adverse noise impacts will be avoided, meeting the first aim of paragraph 5.12.17 of NPS EN-1. All predicted noise levels at receptors are well below thresholds of significant effect – no receptor is expected to experience noise above the level that would cause material health or quality of life impairment.

ii) The Scheme also mitigates and minimises other adverse noise impacts so far as practicable, meeting the second aim of paragraph 5.12.17 of NPS EN-1.

iii) Whilst the Scheme does not contribute to an improvement in existing health and quality of life through the effective management and control of noise, it does not lead to a reduction, meeting the third aim of paragraph 5.2.17 of NPS EN-1.

7.12.25 On the basis of the above, the Scheme meets the tests set out in NPS EN-1.

7.12.26 The Scheme has been appraised against local plan policies relevant to noise and vibration within the **Policy Compliance Document [EN010141/DR/5.4]** and is found to be in compliance.

7.12.27 In conclusion, having regard to the relevant national and local policies on noise and vibration, and based on the findings of **ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]**, the Scheme is considered to be policy compliant.

7.13 Air Quality and Emissions

Planning Policy Context

7.13.1 Overarching air quality policy considerations are set out within Section 5.2 of NPS EN-1. The NPS acknowledges that energy infrastructure can have adverse effects on air quality during construction, operation, and decommissioning, with emissions potentially affecting human health and the environment (paragraph 5.2.1). NPS EN-1 states that regardless of the level of effect on air quality, developments should minimise all emissions as far as possible (paragraph 5.2.3).

7.13.2 Paragraph 5.2.7 of NPS EN-1 notes that proximity to emission sources can have significant impacts on sensitive receptor sites, such as residents or protected ecosystems. Paragraph 5.2.8 requires that where likely significant adverse effects on air quality are likely to occur, the applicant should undertake an assessment of impacts within the ES. Paragraph 5.2.9 then sets out the required contents of the assessment.

7.13.3 For decision making, paragraphs 5.2.16-18 set out that the Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality, and that where a project is proposed near to a sensitive receptor site for air quality then development consent should be refused if justification for the location and a suitable mitigation strategy are not provided.

7.13.4 Paragraph 5.7.1 states that during construction, operation and decommissioning of energy infrastructure there is the potential for emissions arising as dust. NPS EN-1 states that applicants should assess the potential for emissions of dust to have a detrimental impact on amenity (paragraph 5.7.5).

7.13.5 Policy 32 'The impact of development – disturbance and pollution impacts' of the Bedford Borough Local Plan 2030 states that development proposals should ensure that they minimise and take account of the effects of pollution and disturbance. It goes on to state that developers will be required to implement or contribute towards measures to mitigate adverse impacts. Policy 47S 'pollution, disturbance and contaminated land' requires all development proposals to prevent the emission of significant levels of pollutants and to be appropriate for their location. The policy then goes on to state that developers must submit sufficient information to enable development proposals to be properly assessed. Policy 88 'Impact of transport on people, places and environment' is also relevant as it requires planning applications to demonstrate that the impact of traffic has been considered in terms of its impact in Air Quality Management Areas and on air pollution generally.

7.13.6 Policy LP 14 'Amenity' of the Huntingdonshire Local Plan to 2036 states that development proposals will be required to ensure that the predicted adverse impacts from air pollution are made acceptable. Policy LP 36 'Air Quality' sets out the types of development proposals required to be supported by an Air Quality Assessment, and states that they should be proportionate to the nature and scale of the proposal.

Assessment Conclusions

7.13.7 **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]** sets out the Applicant's full assessment of the likely significant impacts and effects of the Scheme on local air quality. This primarily includes fugitive dust generation

and exhaust emissions from additional road traffic and on-site plant and equipment during the construction and decommissioning phases.

Approach

7.13.8 The approach to preparing **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]** has been undertaken in accordance with the current guidance issued by the Institute of Air Quality Management (IAQM) and has been informed by a review of baseline local air quality data and visits to the Site and surrounding environment.

Design and Mitigation Measures

7.13.9 The Applicant has followed the mitigation hierarchy to prevent air quality impacts where possible, with mitigation measures set out within Section 11.9 of **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]** and within the **oCEMP [EN010141/DR/7.3].**

7.13.10 The embedded mitigation measures are provided in Section 11.7 of **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]** and include a commitment to prepare a Construction Dust Management Plan (CDMP) as part of, or to accompany, the final CEMP. The CDMP will include for the implementation of Best Practice Measures to control and manage dust emissions.

Assessment

7.13.11 **ES Vol 2 Appendix 11-3: Construction Dust Assessment [EN010141/DR/6.2]** has considered the potential for fugitive dust to be generated during the various elements of the construction phase across the Site. Potential impacts and resulting effects have been assessed taking into account the nature and extent of the Scheme, local wind data and the sensitivity of the surrounding area. The assessment has been carried out using the qualitative approach described in the latest IAQM guidance on construction dust.

7.13.12 The essence of the IAQM guidance is that best practice working practices and mitigation measures are generally accepted as providing effective control against the impact of airborne dust and suspended particulate matter. These have been included within the **oCEMP [EN010141/DR/7.3]** and would be further provided in the subsequent full CEMP that will be a requirement of any consent.

7.13.13 Through the incorporation of the embedded mitigation and standard dust mitigation measures, no unacceptable impacts or resulting effects on human health, amenity or ecological receptors have been identified.

Appraisal

7.13.14 The Scheme has been designed and includes embedded mitigation such that it is consistent with all national policy and guidance, according with the requirements of NPS EN-1 regarding air quality and emissions impacts.

7.13.15 **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1]** and supporting **ES Vol 2 Appendix 11-3: Construction Dust Assessment [EN010141/DR/6.2]** confirms that the Scheme will have no significant adverse impact or other unacceptable impact on any sensitive receptors.

7.13.16 The Scheme has been appraised against local plan policies relevant to air quality within the **Policy Compliance Document [EN010141/DR/5.4]** and is found to be in compliance.

7.13.17 In conclusion, having regard to the relevant national and local policies on air quality, and based on the findings of **ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1**], the Scheme is considered to be policy compliant.

7.14 Ground Conditions

Planning Policy Context

7.14.1 Overarching policy considerations relating to ground conditions are set out within Section 5.11 of NPS EN-1. The NPS sets out that developing land will

inevitably affect soil resources (paragraph 5.11.4), so applicants should identify effects on soils and seek to minimise impacts on soil health and protect or improve soil quality (paragraph 5.11.13).

7.14.2 Developments are expected to contribute to and enhance the environment by preventing new or existing developments from being put at unacceptable risk from soil pollution or land instability (paragraph 5.11.15).

7.14.3 NPS EN-1 requires that where a development is being proposed on sites with pre-existing land contamination, it should be ensured that the site is suitable for the intended use (paragraph 5.11.17), with risks considered in accordance with contaminated land statutory guidance (paragraph 5.11.5). Applicants are specifically required to assess contamination risks and address them as needed, with opportunities for remediation considered where possible (paragraph 5.11.18).

7.14.4 NPS EN-1 further encourages the use of Soil Management Plans to handle soils sustainably and to carefully consider the sustainable reuse of excavated soils, especially where large volumes may be surplus or affected by contamination (paragraph 5.11.14).

7.14.5 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS notes that whilst land type should not be the sole factor in site selection, use of previously developed, brownfield or contaminated land is encouraged where possible (paragraph 2.10.29).

7.14.6 NPS EN-3 advises applicants to consider site-specific risks and provide relevant geotechnical or hydrological information where necessary (paragraph 2.10.92).

7.14.7 Policy 47S ‘Pollution, disturbance and contaminated land’ of the Bedford Borough Local Plan 2030 requires all development proposals to prevent emission of significant levels of pollutants into the soil, be appropriate for their location and remediate and mitigate despoiled, degraded, contaminated and unstable land so that it is suitable for its proposed use.

7.14.8 The Huntingdonshire Local Plan to 2036 also contains policies of relevance, including Policy LP 37 'Ground Contamination and Groundwater Pollution' which requires development to investigate the risks of ground contamination. If investigations show that the development could result in unacceptable risk, then a risk assessment will be required. In addition, Policy LP 14 'Amenity' requires proposals to ensure that predicted adverse impacts from contamination and water pollution are made acceptable.

Assessment Conclusions

7.14.9 **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]** sets out the Applicant's full assessment of the likely significant effects on ground conditions as a result of the Scheme. The chapter is supported by environmental information set out in **ES Vol 2 Appendix 12-1: Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]**. This section of the Planning Statement contains only a brief summary of the likely impacts and effects.

Approach

7.14.10 The approach to preparing **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]** has been informed by a comprehensive site investigation programme including desk studies, data gathering including a review of information relating to potential unexploded ordnance 'UXO', and walkover surveys undertaken in October 2023.

7.14.11 The Applicant has followed the Environment Agency's Land Contamination Risk Management (LCRM) guidance in preparing the assessment and conducting the **ES Vol 2 Appendix 12-1: Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]**.

Design and Mitigation Measures

7.14.12 The Applicant has followed the mitigation hierarchy to prevent issues as a result of ground conditions as far as possible, with mitigation measures set

out in full within Section 12.7 of **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].**

7.14.13 A number of mitigation measures to be implemented during the construction phase are set out within the **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3].** These measures include targeted intrusive investigations (to areas of proposed ground disturbance), as well as protocols to avoid and reduce the risk of the spread of contamination during works. Construction staff will follow pollution prevention guidelines to avoid introducing new contaminants. If unexpected contamination is encountered, the **oCEMP [EN010141/DR/7.3]** provides for an Unexpected Contamination Protocol (UCP) to stop-work and ensure appropriate remediation procedures. An UXO Management Plan will also be prepared prior to construction commencing and adhered to.

7.14.14 Industry standard mitigation measures will be implemented to manage soils and contamination risks during the construction phase. An **outline Soil Management Plan (oSMP) [EN010141/DR/7.9]** has been prepared, setting out best-practice methods for soil handling, storage, and reuse across all phases of the project.

7.14.15 An **outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5]** will be in place to manage any maintenance activities that involve ground disturbance. Similarly, an **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6]** will ensure that when the Scheme is removed, this is done with measures to protect soils and properly manage or dispose of any waste materials.

Assessment

7.14.16 **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]** evaluates potential contaminant linkages for a range of receptors including construction workers, future site maintenance personnel, nearby residents, controlled waters (groundwater and surface water), built structures and ecological receptors.

7.14.17 A baseline assessment has been completed to qualitatively characterise the identified source-pathway-receptors. This assessment has concluded that isolated areas of made ground may be expected where pits and ponds have been infilled and there were former isolated buildings which have since been demolished. The potential for significant contamination is not anticipated. Where natural soils contain high levels of organic material (such as alluvium), these may give rise to ground gas although the generation potential is low.

7.14.18 A site investigation of limited scale involving intrusive works will be undertaken under LCRM only where ground disturbance is to take place. This will include areas where infilled ponds and pits, plus foundations and / or demolition rubble are identified from the presence of former buildings.

7.14.19 An Unexpected Contamination Protocol (UCP) will be prepared as part of the final CEMP that details the procedures for risk assessment, reporting, remediation and verification (in accordance with LCRM) should any unexpected contamination be discovered during the construction phase.

7.14.20 **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]** confirms that through the implementation of embedded and additional mitigation measures, no significant residual effects on human health, controlled waters, ecological receptors or buildings / ground stability have been identified during both the construction, operational and decommissioning phases.

7.14.21 Overall, the effects are predicted to be not significant with respect to ground conditions and contamination and no significant residual effects have been identified.

Appraisal

7.14.22 National policy requirements for managing soils, contamination and stability are addressed by the application. NPS EN-1 calls for careful assessment of soil impacts and encourages mitigation to protect soil quality; the Applicant has undertaken a thorough geo-environmental assessment of the Site's soils

and geology to identify any contamination or stability risks, and to inform the mitigation strategy.

7.14.23 The inclusion of the **oSMP [EN010141/DR/7.9]** directly responds to NPS EN-1 paragraph 5.11.14, which encourages Soil Management Plans to minimise land contamination and ensure sustainable reuse of soil resources.

7.14.24 NPS EN-1 also requires that new developments should not be put at unacceptable risk from existing contamination or land instability. The Applicant's investigations have confirmed that the Site is suitable for the Scheme; no unacceptable risks have been found, and any pre-existing contamination will be managed or remediated so that the Scheme will not introduce risks to people or the environment.

7.14.25 The remedial strategy and the engineering design of foundations ensure that land instability and settlement risks are adequately controlled, aligning with NPS EN-1 (paragraphs 5.11.17–5.11.18) which require making sure the ground is stable and safe for the intended use.

7.14.26 The Scheme has been appraised against local plan policies relevant to ground conditions within the **Policy Compliance Document [EN010141/DR/5.4]** and it is found to be in compliance.

7.14.27 In conclusion, having regard to the relevant national and local policies on ground conditions, and based on the findings of **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]**, the Scheme is policy compliant.

7.15 Agricultural Land

Planning Policy Context

7.15.1 Overarching policy considerations relevant to agricultural land are set out within Section 5.11 of NPS EN-1, with further considerations provided in the technology specific NPS EN-3.

7.15.2 NPS EN-1 directs that applicants should seek to minimise impacts on the 'best and most versatile' (BMV) agricultural land – defined as Grades 1, 2, and 3a – and instead use lower quality land (Grades 3b, 4, 5) wherever possible (para. 5.11.12). Applicants are also expected to identify and mitigate effects on soil health, protecting or improving soil quality with appropriate measures (para. 5.11.13).

7.15.3 NPS EN-1 encourages applicants to prepare a Soil Management Plan to ensure sustainable handling of soils and to reduce contamination risks, especially if significant volumes of soil will be disturbed (para. 5.11.14).

7.15.4 In terms of decision-making, NPS EN-1 sets out that applicants should avoid siting projects on BMV agricultural land without clear justification. If development on BMV land is proposed, the economic and other benefits of that farmland should be taken into account, and poorer quality land should be preferred over higher quality land (para. 5.11.34).

7.15.5 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS sets out that whilst land type should not be the predominant factor in site selection, applicants should, where possible, use previously developed, brownfield, contaminated or industrial land for solar projects. If the use of agricultural land is necessary, poorer quality farmland should be preferred and BMV land avoided as far as practicable (paragraph 2.10.29).

7.15.6 NPS EN-3 makes clear that while development of ground-mounted solar arrays on BMV land is not prohibited, any such proposal's impacts on the land and environment must be carefully considered (paragraph 2.10.30).

7.15.7 NPS EN-3 acknowledges that at the scale of NSIP solar projects some use of agricultural land is likely; accordingly, applicants should explain their site selection, demonstrating that they have considered and, where possible, prioritised brownfield sites, existing industrial land, and lower-grade agricultural land in preference to higher-grade farmland (paragraph 2.10.31).

7.15.8 NPS EN-3 states that the Agricultural Land Classification (ALC) is the appropriate system for grading land, and where relevant field surveys should be conducted to establish the ALC grade and soil characteristics. This information should be used to inform soil management practices during construction, operation, and decommissioning of the solar farm (paragraph 2.10.33).

7.15.9 Finally, NPS EN-3 notes at paragraph 2.10.32 that consideration may be given as to whether the proposal allows for continued agricultural use or co-location with other functions, to maximise the efficiency of land use.

7.15.10 Policy LP 10 of the Huntingdonshire Local Plan and Policy 46S of the Bedford Borough Local Plan echo the national policy approach of directing development in the countryside towards land of a lower agricultural value "where possible". Policy 57 of the Bedford Borough Local Plan provided the potential impacts on BMV land have been addressed, and identifies broad locations with potential for large-scale solar on Figure 13 of the Plan.

Assessment Conclusions

Approach

7.15.11 A detailed ALC and soil resources survey has been undertaken and is reported as **ES Vol 2 Appendix 13-1: Agricultural Land Classification and Soil Resources [EN010141/DR/6.2]**. The ALC survey has informed the assessment of likely significant effects within **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]**.

Design and Mitigation Measures

7.15.12 The Applicant has followed the mitigation hierarchy to avoid impacts on land of a higher agricultural value where possible, beginning with the site selection stage reported in **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]**.

7.15.13 As set out in ES Vol 2 Appendix 3-1, the site identification work firstly considered brownfield and previously developed land within a 15 km search radius of the point of connection at the Eaton Socon Substation, concluding that none could deliver the total land required either alone or in practicable clusters for the Scheme, and as such using agricultural land was necessary. The Applicant then reviewed provisional agricultural land classification mapping within 15km of the point of connection in order to identify a 'Search Zone' with a greater likelihood of avoiding BMV land, in line with NPS EN-1 and NPS EN-3. The site identification work concluded that that there was no Search Zone around the point of connection that was not constrained in some way, and that only by taking a balanced consideration of technical and environmental factors was it possible to select a search zone for the Site.

7.15.14 The key determining factor in recommending the final Search Zone for the Site was that it was likely to have the most straightforward grid connection, which in turn would avoid and reduce environmental impacts, affect less landowners, and ensure that the Scheme remains commercially viable. In terms of agricultural land classification it was established that the Site would be likely to include some areas of BMV land, but that with the evidence available it was unlikely to contain significantly greater or lesser extents of BMV land than any other area within 15km of the point of connection. NPS EN-3 is clear however (Paragraph 2.10.29) that 'land type should not be a predominating factor in determining the suitability of the site location'.

7.15.15 The above measures set out the steps taken to avoid development of BMV land as far as practicable, being the first step in the mitigation hierarchy.

7.15.16 To reduce and minimise impacts to soils, the mounting structures for the solar arrays utilise ram-driven posts for the arrays which do not require excavation, minimising soil disturbance and enabling reinstatement at decommissioning. The Applicant has prepared an **outline Soil Management Plan [EN010141/DR/7.9]** that sets out how soils will be managed throughout the lifetime of the Scheme to minimise adverse impacts, including by committing to best practice guidance for soil handling. Mitigation measures are also set

out within Section 13.7 of **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]**.

7.15.17 During operation, the grassland swards proposed across the majority of the Site are expected to deliver improved soil functions such as structure, soil organic carbon, and reduced erosion.

7.15.18 The Applicant has partnered with Rothamsted Research to undertake scientific research on co-locating agricultural production with solar generation in the UK. This will include research into soil conditions across the Site over the operational phase of the Scheme. The research proposed as part of the 'Agrisolar Research Area' in East Park Site D will enhance an understanding of 'agrivoltaics' and their application within the UK.

7.15.19 The Applicant has prepared an **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]** which sets out that the grassland beneath the solar arrays will be managed through rotational sheep grazing, and as such agricultural production across the Site will not cease over the lifetime of the Scheme, rather it will transition from arable production to less intensive livestock production.

7.15.20 The Scheme is temporary and reversible, with an operational phase of 40 years. As set out in Section 2.7 of **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**, after decommissioning the Site will be returned to a condition suitable for its original use (i.e. arable farming), however it will be at the discretion of the landowners what to do with the land post-decommissioning as the Applicant's leases and control of the land would have ended.

Residual Effects

7.15.21 The ALC survey confirmed that the Site comprises a mix of Grade 2 (very good), Grade 3a (good) and Grade 3b (moderate) agricultural land. The ALC distribution reported in Table 13.8 of **ES Chapter 13: Land and Soils [EN010141/DR/6.1]** is:

- Grade 2 - 164.0 ha (21.2%);
- Grade 3a - 349.5 ha (45.2%); and
- Grade 3b - 182.4 ha (23.6%).

7.15.22 There are also small areas of the Site classed as ungraded and non-agricultural, with ungraded land treated as Grade 2 for environmental assessment purposes.

7.15.23 **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]** concludes that there would be a moderate adverse and significant effect in relation to temporary and permanent impacts to Grade 2 agricultural land resulting primarily from the removal of land from arable agricultural production for the duration of the Scheme and the creation of access tracks across the Site. In total, 1.40 hectares of Grade 2 and 'Ungraded' (treated as Grade 2 for assessment purposes) land will be permanently adversely affected by the Scheme; this is distributed across the Site in narrow strips relating to access tracks which are generally up to 4m wide, and the footprint of transformers. There would also be temporary and permanent adverse impacts to Grade 3a land which is best and most versatile, but in isolation (and in accordance with IEMA guidance that this land classification is less sensitive than Grade 2 land), the effect to Grade 3a land would be minor adverse which is not significant in EIA terms.

7.15.24 In total, the Scheme would result in permanent adverse impact to approximately 5.76 hectares of best and most versatile land. The remainder of the best and most versatile (Grade 2 and Grade 3a) land within the Site would not be permanently adversely impacted by the Scheme and could be easily reverted to its existing agricultural condition upon completion, with anticipated benefits in relation to soil structure and resources.

7.15.25 There would be a significant beneficial effect to soil resources during the operational phase as the land would be rested from arable rotation and the grassland would bind the soils reducing the impact of vehicle trafficking during routine maintenance. There would also be an improvement in soil functions

by increasing ecosystem services including carbon sequestration to remove carbon from the atmosphere and increase soil organic carbon, and reduce water run-off and siltation compared to periods where soils would be bare during arable rotation.

Appraisal

7.15.26 The Scheme has been developed and assessed in accordance with national and local policy requirements.

7.15.27 There is no policy requirement that prohibits solar development on best and most versatile agricultural land. NPS EN-1 and NPS EN-3 state that that land type should not be a predominating factor in site selection, only that where agricultural land is required, poorer quality land should be preferred "where possible", but development on BMV is not prohibited and may be justified. The approach taken by the Applicant is set out above under 'Design and Mitigation Measures' and it is concluded that the Applicant has sought to avoid BMV land where practicable and possible, in line with the NPSs, and has justified the selection of the Site and of BMV land (NPS EN-1 paragraph 5.11.34).

7.15.28 The Applicant has prepared an **outline Soil Management Plan [EN010141/DR/6.1]** as encouraged by NPS EN-1 (paragraph 5.11.14) which sets out how soils will be protected and managed throughout the lifetime of the Scheme.

7.15.29 A recurring public concern is that using BMV land for solar development entails a material and enduring loss of the nation's best farmland. It is important to note here that there should be a distinction between "use" and "loss". "Loss" in a soils context is typically understood as a permanent and irreversible change in soil function or quality (for example, sealing under buildings); by contrast, the approach to solar development of using ram-driven posts, minimal excavation, segregated soil handling and reinstatement at decommissioning produces an almost entirely reversible land-use change. Where permanent concrete pads or access tracks are necessary, they are a

very small fraction of the Site. The remainder of the Site retains its soil profile and capability, can be managed as grassland during operation, and returns to arable use after decommissioning.

7.15.30 The need for and benefits of the Scheme are well established in Sections 2 and 5 of this Planning Statement, particularly the Critical National Priority status of the development, and it is considered that the substantial positive weight that should be afforded to the Scheme clearly outweighs the limited negative weight that should be given to the harm to agricultural land and soils. This is consistent with recent Secretary of State decisions on other solar NSIPs that have resulted in the temporary and permanent loss of BMV land, such as:

Table 2: BMV Land for Other Solar NSIPs

Solar NSIP	Site Area (ha)	BMV Land Proportion	Secretary of State Decision on Agricultural Land and Soils
Oaklands Farm Solar Park	191 ha	115 ha (60%) is BMV land (Grade 2 = 36 ha, Grade 3a = 79 ha). With the remainder mostly Grade 3b (70 ha / 37%).	The SoS agreed with the Examining Authority's (ExA's) weighting of ***little negative weight*** on this matter. Although the majority of the site is BMV, this represents just 0.003% of BMV land in England, and therefore its temporary loss is insignificant. The ExA was satisfied with the Applicant's consideration of alternative sites and site selection, and considered that the impacts on BMV land are in accordance with paragraph 5.11.34 of NPS EN-1 and paragraph 2.10.31 of NPS EN-3, and was satisfied that the use of agricultural land is justified in accordance with NPS EN-3.
Mallard Pass Solar Project	852 ha	360 ha (42.2%) is BMV land (Grade 2 = 100 ha, 3a = 260 ha). With the remainder mostly Grade 3b (439 ha / 51.5%).	The SoS considers that the matter should be ascribed ***moderate negative weight***. The SoS concludes that the siting of the Scheme on BMV land has been justified, and is satisfied with the approach to site selection. The SoS does however also acknowledge that there are harms due to the long-term use of

Solar NSIP	Site Area (ha)	BMV Land Proportion	Secretary of State Decision on Agricultural Land and Soils
			agricultural land as a result of the scheme.
Heckington Fen Solar Park	524 ha	257 ha (49%) is BMV land (Grade 1 = 58 ha, Grade 2 = 39 ha, Grade 3a = 160 ha). With the remainder mostly Grade 3b (265 ha / 50.6%)	The SoS agreed with the ExA's weighting of ***little negative weight*** on land use and soils, and ***moderate negative weight*** with regards to cumulative effects on BMV. The SoS agrees with the ExA that whilst the proportion of BMV across the Scheme is high, it is temporary and not irreversible. In addition, agricultural use will still continue through sheep grazing and that this is sufficiently secured in the Order and OEMP. The SoS also agrees with the ExA that the OEMP and SMP provide assurance that the land can be returned to equal ALC value post-development and, attributable to the change in agricultural use to sheep grazing, could improve in soil quality. Nonetheless, the SoS acknowledges that the permanent loss of 2.8 ha of BMV is a harm of the development, and considered with the cumulative loss of BMV across Lincolnshire, has a moderate adverse effect.
West Burton Solar Project	757.8 ha	199.5 ha (26.4%) is BMV land (Grade 1 = 17.6 ha, Grade 2 = 9.5 ha, Grade 3a = 172.4 ha). With the remainder mostly Grade 3b (557 ha / 73.5%).	The SoS agreed with the ExA's weighting of ***little negative weight*** on this matter. The SoS places great importance on the protection of BMV land and acknowledges there are harms due to its fixed-term, albeit reversible, use. However, the SoS is satisfied that the development's siting on BMV land is justified, noting the Applicant's consideration of the relevant 2011 and 2024 NPS tests.
Sunnica Energy Farm	981 ha	37.3 ha (3.8%) is BMV land (Grade 3a). With the remainder of the site of a lower quality, with 493.3 ha	The SoS considers that the matter should be ascribed ***slight negative weight***. The SoS is satisfied that the Applicant has properly assessed

Solar NSIP	Site Area (ha)	BMV Land Proportion	Secretary of State Decision on Agricultural Land and Soils
		(50.3%) Grade 3b, and 393.4 ha (40.1%) Grade 4 agricultural land.	agricultural land classification and properly justified the extent of use of BMV land. The SoS notes guidance in 2024 NPS EN-3 that "*land type should not be a predominating factor in determining the suitability of the site location*". The SoS went on to state that a solar farm is a temporary and reversible development and considers that there is no evidence to suggest that agriculture cannot be reestablished on the land temporarily lost.

7.15.31 The Scheme has been appraised against local plan policies relevant to agricultural land within the **Policy Compliance Document [EN010141/DR/5.3]** and it is found to be in compliance.

7.15.32 In conclusion, having regard to the relevant national and local policies on agricultural land, and based on the findings of **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]**, the Scheme is considered to be policy compliant.

7.16 Mineral Safeguarding

Planning Policy Context

7.16.1 Overarching mineral safeguarding policy considerations are set out within Section 5.11 of NPS EN-1. Paragraph 5.11.19 states:

> *"Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place."*

7.16.2 Paragraph 5.11.28 states:

> *"Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), appropriate mitigation measures to*

safeguard mineral resources should be put in place to safeguard mineral resources."

7.16.3 In terms of local policy, the relevant mineral safeguarding policies in this case are contained within the Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP: SSP), adopted in 2014, and the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036, adopted in 2021.

7.16.4 Policy MSP 11 'Mineral Resource Assessment' of the MWLP: SSP identifies that surface development proposals located within a Mineral Safeguarding Area should be accompanied by a Minerals Resource Assessment. Policy MSP 12 of the MWLP: SSP states that surface development will only be permitted within a Mineral Safeguarding Area where it is demonstrated that the development will not inhibit extraction if required in the future. Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 is also of relevance and states that Mineral Planning Authorities should be consulted on all development proposals within Mineral Safeguarding Areas (with some exceptions, not relevant to the Scheme).

Assessment Conclusions

7.16.5 An assessment of the impact of the Scheme on safeguarded minerals resource is set out within **Planning Statement Appendix B – Mineral Safeguarding Report [EN010141/DR/5.3],** as well as **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]**. The assessment identifies that the Order Limits lie partially within areas that have been allocated by BBC and CCC as Mineral Safeguarding Areas.

7.16.6 As set out within **Planning Statement Appendix B – Mineral Safeguarding Report [EN010141/DR/5.3]** and within Section 13.8 of **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]**, the Scheme would be temporary in nature and decommissioned after 40 years. Any impacts caused by the Scheme related to land use are considered reversible. The minerals within the Order Limits would not be permanently sterilised, and post

decommissioning, the land could be worked for minerals if required. Thus, the Scheme is considered to meet the requirements of NPS EN-1, Policies MSP 11 and 12 of the MWLP: SSP, and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

Appraisal

7.16.7 The **Planning Statement Appendix B – Mineral Safeguarding Report [EN010141/DR/5.3],** as well as **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]** confirms that the Scheme would not result in the sterilisation of any mineral resource due to it temporary and reversable nature.

7.16.8 The Scheme has been appraised against local plan policies relevant to mineral safeguarding within the **Policy Compliance Document [EN010141/DR/5.4]** and is found to be in compliance.

7.16.9 In conclusion, having regard to the relevant national and local policies on mineral safeguarding, and based on the findings of **Planning Statement Appendix B – Mineral Safeguarding Report [EN010141/DR/5.3]** and **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1],** the Scheme is considered to be policy compliant.

7.17 Socio Economic Impacts

Planning Policy Context

7.17.1 Overarching socio-economic policy considerations are set out in Section 5.13 of NPS EN-1. The NPS advises applicants to consider all pertinent socio-economic impacts, including potential job creation and training opportunities, with an emphasis on sustainable jobs that help develop skills for the transition to Net Zero (paragraph 5.13.4). Furthermore, consideration should be given to the provision of educational and visitor facilities, or any indirect beneficial impacts for the region hosting the infrastructure such as local supply chains (paragraph 5.13.4).

7.17.2 In decision-making, the Secretary of State should consider any evident socio-economic effects (both positive and negative), giving little weight to assertions that lack supporting evidence (paragraph 5.13.9-10).

7.17.3 NPS EN-1 states that the Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities (paragraph 5.13.12).

7.17.4 In terms of local policy, Policy 57 'Renewable Energy – General Impact' of the Bedford Borough Local Plan 2030 states that proposals for renewable energy development will be supported subject to the acceptability of their wider impacts, including its social and economic impacts. Furthermore, Policy LP 35 'Renewable and Low Carbon Energy' of the Huntingdonshire Local Plan to 2036 states that proposals for renewable or low carbon energy generating schemes will be supported where it is demonstrated that all potential adverse impacts, including cumulative impacts, are or can be made acceptable.

Assessment Conclusions

7.17.5 **ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1]** presents the findings of a detailed assessment of the likely significant impacts and effects on socio-economics, development land, and tourism during the construction, operation, and decommissioning phases of the Scheme.

7.17.6 **ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1]** concludes that at each of the construction, operational, and decommissioning stages, the effects of the Scheme are expected to be moderate beneficial (local) and minor beneficial (regional) in terms of the economy, and with minor or negligible adverse effects on development land, tourism, private and community assets, and development land. No effects are expected to be Major or Major / Moderate which could then be considered significant.

Appraisal

7.17.7 **ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1]** confirms that the Scheme would not result in any significant adverse effects in relation to development land and tourism, and is expected to have benefits to the economy.

7.17.8 The Scheme has been appraised against local plan policies relevant to socio-economics within the **Policy Compliance Document [EN010141/DR/5.4]** and is found to be in compliance.

7.17.9 In conclusion, having regard to the relevant national and local policies and based on the findings of **ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1],** the Scheme is considered to be policy compliant.

7.18 Climate Change and Greenhouse Gas Emissions

Planning Policy Context

7.18.1 Overarching climate change and greenhouse gas emissions policy considerations are set out within Section 4.10 and Section 5.3 of EN-1. The NPS emphasises that new energy infrastructure must be sufficiently resilient to the impacts of climate change over its full life cycle. Applicants are expected to consider both climate change mitigation (reducing greenhouse gas emissions) and adaptation (ensuring resilience to future climate conditions) in project design.

7.18.2 Section 4.10 of NPS EN-1 deals with climate change resilience and adaptation and expects the applicant's ES to set out how a development will take account of the projected impacts of climate change (paragraph 4.10.9), considering a range of climate change scenarios to demonstrate that the development has a high level of climate resilience (paragraph 4.10.10-11). Where there are safety critical elements to the development, a credible

maximum climate change scenario should be applied to ensure those elements are safe for the lifetime of the development (paragraph 4.10.12).

7.18.3 Section 5.3 of NPS EN-1 deals with greenhouse gas emissions and notes that whilst new energy infrastructure is vital to decarbonise the economy; the construction, operation and decommissioning of that energy infrastructure will in itself lead to greenhouse gas emissions (paragraph 5.3.1). Paragraph 5.3.4 of NPS EN-1 states that all applications should include a greenhouse gas assessment as part of their ES and sets the requirements of the assessment. For decision making, paragraph 5.3.8-10 of NPS EN-1 state that the Secretary of State should be satisfied that the applicant has as far as possible assessed and taken reasonable steps to reduce the greenhouse gas emissions of a project.

7.18.4 NPS EN-3 provides limited further specific requirements in relation to solar development but does note at paragraph 2.4.11 that consideration should be given to climate resilience and an increased risk of flooding and impact of higher temperatures.

7.18.5 A number of the objectives contained within the Huntingdonshire Local Plan to 2036's relate to climate change, including Objective 2 which seeks to promote high quality, well designed, sustainable development that is adaptable to climate change and resilient to extreme weather, and Objective 24 which encourages pollution control practices which minimise and reduce contributions to climate change and avoid adverse impacts on the local environment or human health.

7.18.6 Policy LP 35 'Renewable and Low Carbon Energy' of the Huntingdonshire Local Plan to 2036 is also of relevance as it states that proposals for renewable or low carbon energy generating schemes will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts can be made acceptable.

7.18.7 There are several relevant objectives within the Bedford Borough Local Plan 2030, including Objective 4.1 which seeks to deliver development that is

equipped to respond to the impacts of climate change, as well as Objective 4.10 which seeks to protect and enhance natural resources, including air, soil minerals and water to minimise the impacts of flooding, climate change and pollution. Furthermore, Policy 51S 'Climate Change Strategic Approach' of the Bedford Borough Local Plan 2030 identifies that the Council will require the development and use of land and buildings to address climate change, adapting to anticipated future changes and mitigating against further change by reducing greenhouse gas emissions.

Assessment Conclusions

7.18.8 **ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1]** sets out the Applicant's full assessment of the likely significant climate change effects as a result of the Scheme and is supported by **ES Vol 2 Appendix 15-1: Greenhouse Gas Assessment [EN010141/DR/6.2]** and **ES Vol 2 Appendix 15-3: Climate Resilience Assessment [EN010141/DR/6.2]**.

Design and Mitigation Measures

7.18.9 The Applicant has as far as practicable followed the mitigation hierarchy in addressing its climate change impacts and resilience, and greenhouse gas emissions, with mitigation measures set out within Section 15.7 of **ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1].**

7.18.10 From the outset, the primary purpose of the Scheme is to avoid greenhouse gas emissions by generating renewable electricity without burning fossil fuels. This avoids the significant carbon emissions that a conventional power station of equivalent output would produce. Beyond this inherent benefit, the Scheme incorporates measures to minimise greenhouse gas emissions at every stage. During construction, mitigation measures to reduce greenhouse gas emissions are set out in the **oCEMP [EN010141/DR/7.3]**, which includes for optimising vehicle movements, using modern equipment and machinery, and maximising the reuse of materials on site. Further measures for the operational phase are then set out in the **oOEMP [EN010141/DR/7.5]** and for the decommissioning phase in the **oDEMP [EN010141/DR/7.6]**. These

measures incorporate the GHG Reduction Strategy for the purposes of paragraph 5.3.7 of NPS EN-1.

7.18.11 The project design process has also integrated climate resilience measures from an early stage. As set out in detail within **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2],** though very small areas of the Site within the Scheme Boundary are located within fluvial Flood Zones 2 and 3, all infrastructure would be located in areas at the lowest possible risk of fluvial flooding, i.e., in Flood Zone 1. Small areas of solar panels are within pluvial flood zones according to national scale pluvial flood mapping. However, it is proposed that all panels are elevated above predicted flood levels on piled supports.

7.18.12 Climate resilience mitigation measures are also set out in the **oCEMP [EN010141/DR/7.3]** and **oOEMP [EN010141/DR/7.5].**

Assessment

7.18.13 **ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1]** and **ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2]** calculate the total lifecycle emissions of the Scheme.

7.18.14 The assessment considers the resilience of the Scheme to the projected changes in climate, the impact of the Scheme on climate change and measures taken to mitigate the impacts.

7.18.15 The resilience of the Scheme to the effects of climate change has been assessed to be negligible to slight, which is not significant. Therefore, it is considered that the Scheme is resilient to the effects of climate change and no additional mitigation measures are recommended.

7.18.16 The Scheme has a beneficial effect on climate change which is a significant effect. This is because the Scheme's net greenhouse gas impacts are below zero as it causes a reduction in atmospheric greenhouse gas concentration indirectly through offsetting other more carbon intensive methods of electricity

generation. Additionally, the Scheme substantially exceeds net zero requirements and has a positive climate impact.

Appraisal

7.18.17 The Scheme is entirely consistent with national policy set out in NPS EN-1 and local policy set out within the Huntingdonshire Local Plan to 2036 and Bedford Borough Local Plan 2030. The Scheme directly advances the core aim of NPS EN-1 and NPS EN-3 to decarbonise the energy sector.

7.18.18 The Scheme demonstrates a robust approach to climate adaptation and resilience, which is a requirement of both NPS EN-1 (Section 4.10) and NPS EN-3 (Section 2.4). By designing and mitigating for future climate scenarios (in terms of flood depths, or temperature extremes), the Scheme is compliant with paragraphs 4.10.9-4.10.12 of NPS EN-1.

7.18.19 The Applicant has quantified the greenhouse gas emissions in accordance with paragraph 5.3.4 of NPS EN-1, including a full lifecycle greenhouse gas assessment that demonstrates alignment with the UK's trajectory towards net zero. The Scheme incorporates all reasonable measures to reduce greenhouse gas emissions, as per paragraph 5.3.8-10 of NPS EN-1.

7.18.20 The Scheme has been appraised against local plan policies relevant to climate change matters within the **Policy Compliance Document [EN010141/DR/5.4]** and is found to be in compliance.

7.18.21 In conclusion, having regard to the relevant national and local policies on climate change, and based on the findings of **ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1]**, the Scheme is considered to be policy compliant.

7.19 Resource and Waste Management

Planning Policy Context

7.19.1 Overarching resource and waste management considerations are set out within Section 5.15 of NPS EN-1. The NPS emphasises application of the waste hierarchy – prioritising waste prevention, then re-use, recycling, recovery, and disposal only as a last resort (paragraph 5.2.12).

7.19.2 Applicants are required to set out the arrangements that are proposed for managing any waste produced and set out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities (paragraph 5.15.8).

7.19.3 NPS EN-1 states that for decision making, the Secretary of State should be satisfied that a robust strategy is in place for managing waste in line with the waste hierarchy across the lifetime of the Scheme (paragraph 5.15.15), and where necessary use requirements to ensure that appropriate measures for waste management are applied (paragraph 5.15.16).

7.19.4 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS notes that solar panel performance degrades over time and as such there may be a need to replace or upgrade panels and equipment during the life of the project to maintain efficiency (paragraph 2.10.55).

7.19.5 Policy 49 ‘Waste’ of the Bedford Borough Local Plan 2030 reflects national policy and seeks to ensure that proposals likely to generate significant volumes of waste through construction or operation, demonstrate that waste will be minimised as far as possible and managed in line with the waste hierarchy. The importance of the waste hierarchy is also identified within the Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies (2014) and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021).

Assessment Conclusions

7.19.6 Section 16.3 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** identifies the likely waste streams arising from the Scheme and whether these would result in any likely significant environmental effects. Given the nature of the Scheme, significant quantities of waste are not anticipated.

7.19.7 The **oCEMP [EN010141/DR/7.3]**, **oOEMP [EN010141/DR/7.5]** and **oDEMP [EN010141/DR/7.6]** describe embedded mitigation measures to control and manage waste on-site. In addition, an **outline Waste Management Plan [EN010141/DR/7.12]** has been prepared as part of the application.

7.19.8 The assessment contained within Section 16.3 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** with regards to waste concludes that with the implementation of the aforementioned management plans, included the **outline Waste Management Plan [EN010141/DR/7.12]** incorporated as part of the Scheme, there would be no significant effects resulting from the Scheme.

7.19.9 In addition, the Applicant has prepared an **outline Soil Management Plan [EN010141/DR/7.9]** that sets out the approach to be taken to sustainably managing soil resources across the Site, including the handling of potentially contaminated land.

Appraisal

7.19.10 The Applicant's approach to waste management is consistent national policy contained within NPS EN-1 and NPS EN-3, and in accordance with local planning policies.

7.19.11 As set out in Section 16.3 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** the Applicant has anticipated that, due to the nature of the project, significant quantities of waste are not anticipated. Nonetheless, the **oCEMP [EN010141/DR/7.3]**, **oOEMP [EN010141/DR/7.5],**

oDEMP [EN010141/DR/7.6] and **outline Waste Management Plan [EN010141/DR/7.12]** set out the embedded mitigation to control and manage waste on-site, and the framework for the management of waste.

7.19.12 As set out in **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1],** any arisings would be managed in accordance with the Waste Duty of Care Code of Practice, which implements the duty of care set out in Section 34(1) of the Environmental Protection Act 1990. Wastes would be managed in accordance with the waste hierarchy as set out in the Waste (England and Wales) Regulations 2011, any waste capable of being recycled would be sent to an appropriate recycling waste management facility.

7.19.13 Through all phases of the development, the waste hierarchy would be complied with such that opportunities to minimise waste as far as possible will be explored. Possibilities to re-use or recycle materials will be explored before resorting to landfill options, in accordance with paragraph 5.2.12 of NPS EN-1.

7.19.14 The Scheme has been appraised against local plan policies relevant to waste management within the **Policy Compliance Document [EN010141/DR/5.4]** and is found to be in compliance.

7.19.15 In conclusion, having regard to the relevant national and local policies on waste management, and based on the findings of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]**, specifically Section 16.3: Waste, the Scheme is policy compliant.

7.20 Human Health

Planning Policy Context

7.20.1 Overarching human health policy considerations are set out within Section 4.4 of NPS EN-1, which requires applicants to evaluate the likely impacts of a proposed development on human health within the ES, and to identify appropriate mitigation measures (paragraph 4.4.4). NPS EN-1 notes that a

development may have direct impacts on health which could include increased traffic, air or water pollution, dust and odour, hazardous waste, noise, radiation, or an increase in pests (paragraph 4.4.2). Development could also have indirect health impacts, for example if it affects key public services, or the use of open space for recreation and physical activity (paragraph 4.4.3).

7.20.2 NPS EN-1 highlights the importance of addressing indirect health impacts by promoting enhancements to encourage health and well-being, and paying particular attention to effects on vulnerable populations and those with protected characteristics who might be disproportionately affected (paragraph 4.4.6).

7.20.3 In terms of decision-making, NPS EN-1 notes that many health-related effects of energy projects (such as pollution control) are managed by separate regulatory regimes, meaning significant health risks are unlikely to justify refusal if properly regulated (paragraph 4.4.7). However, any residual health concerns not addressed by other regimes (for instance, noise disturbance) may still be taken into account by the Secretary of State when imposing requirements on a project (paragraph 4.4.8).

7.20.4 In addition, NPS EN-1 contains a series of topic-specific considerations in Section 5.0 that are relevant to protecting human health. These include policies on air quality (Section 5.2), noise and vibration (5.12), traffic and transport (5.14), flood risk (5.8), and others such as dust, odour, light and other nuisances (5.7), water quality (5.16), and land use including green infrastructure (5.11). Taken together, these policies require that the environmental factors which can affect human health are thoroughly assessed and controlled.

7.20.5 Further technology-specific considerations are set out within NPS EN-3. Section 2.10 of NPS EN-3 addresses the design and operation of solar developments and, while it does not introduce new health-specific policies, it reinforces certain considerations to protect people's health and amenity, such

as mitigating for construction traffic, maintaining public access, and mitigating glint and glare.

7.20.6 Section 5 of the Bedford Borough Local Plan 2030 is dedicated to 'Health'. Policy 2S 'Healthy Communities' aims to reduce health inequalities and promote healthier lifestyles. This policy requires development of a certain scale to provide a Health Impact Assessment, and to be designed to promote health, safety and active living. Policy LP 29 'Health Impact Assessment' of the Huntingdonshire Local Plan to 2036 also requires the design of large scale development to be informed by the conclusions of a rapid Health Impact Assessment.

Assessment Conclusions

7.20.7 Section 16.2 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** considers the potential impacts on human health (both physical health and mental wellbeing) arising from the Scheme, and how the design development and assessment process has strived to reduce the effects of adverse impacts, whilst maximising enhancements where impacts are likely to be beneficial. The Scoping Opinion issued by the Planning Inspectorate (see **ES Vol 2 Appendix 4-2 [EN010141/DR/6.2]**) confirmed the assessment of likely significant effects in relation to human health does not require a standalone assessment chapter within the ES. An assessment of the Scheme's impacts on the established 'wider determinants of health' has been undertaken.

Approach

7.20.8 The approach to identifying potential likely significant effects on human health within Section 16.2 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** associated with the Scheme has been derived from the following guidance published by the Institute of Environmental Management and Assessment (IEMA) in November 2022, and referred to by the Planning Inspectorate in its Scoping Opinion:

- IEMA Guide to: Effective Scoping of Human Health in Environmental Impact Assessment ('IEMA Scoping Guidance')[52]; and
- IEMA Guide to: Determining Significance for Human Health in Environmental Impact Assessment ('IEMA Assessment Guidance')[53].

Design and Mitigation Measures

7.20.9 The Applicant has followed the mitigation hierarchy to prevent harm to human health where possible, with mitigation measures set out in full within Table 16.3 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]**.

7.20.10 The mitigation measures include the creation of a number of new permissive paths to increase recreational opportunity within and around the Site, providing a range of transport options including sustainable transport options to facilitate site travel on a daily basis, and locating construction compounds away from sensitive receptors to minimise any impact from construction plant and machinery.

7.20.11 Environmental mitigation measures for human health are also set out for the construction, operation and decommissioning phases in the following control documents:

- **oCEMP [EN010141/DR/7.3]**;
- **oOEMP [EN010141/DR /7.5]**;
- **oDEMP [EN010141/DR /7.6]**;
- **oCTMP [EN010141/DR /7.4]**;
- **Outline Battery Safety Management Plan (oBSMP) [EN010141/DR /7.10]**;
- **Outline Public Rights of Way Management Plan [EN010141/DR /7.8]**; and
- **Outline Soil Management Plan [EN010141/DR/7.9]**.

Appraisal

7.20.12 Section 16.2 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** considers the potential impacts on human health arising from the Scheme. The assessment concludes that with the mitigation measures, the Scheme would not result in any residual significant adverse effects on human health. The Scheme is therefore compliant with applicable policy set out in NPS EN-1 at paragraph 4.4.7 and 4.4.8.

7.20.13 The Scheme has been appraised against local plan policies relevant to human health impacts within the **Policy Compliance Document [EN010141/DR/5.4]** and it is found to be in compliance.

7.20.14 In conclusion, having regard to the relevant national and local policies on human health, the Scheme is considered to be policy compliant.

7.21 Safety and Security Considerations

Planning Policy Context

7.21.1 Overarching safety and security policy considerations are set out within Section 4.13 of NPS EN-1. The NPS requires applicants to consult with the HSE on matters relating to safety (paragraph 4.3.15).

7.21.2 Further technology-specific considerations are set out within Section 2.10 of NPS EN-3. The NPS recognises that large solar sites will include security measures and must be planned with safety and security in mind.

7.21.3 NPS EN-3 notes that associated infrastructure for solar farms often encompasses site security provisions such as perimeter fencing, lighting, or CCTV (paragraph 2.10.16). NPS EN-3 advises that security measures should be designed on a site-specific basis, and that an assessment is provided of the potential visual impacts of such infrastructure.

7.21.4 Policy 2S ‘Health Communities’ and Policy 29 ‘Design Quality and Principles’ of the Bedford Borough Local Plan 2030 require development to be designed

to promote health and safety, and policy 57 ‘Renewable Energy – general impact’ requires all proposals for solar energy schemes to address security measures. Policy 31 ‘The Impact of Development – Access Impacts’ as well as Policy 88 ‘Impact of Transport on People, Places and environment’ seeks to ensure that developments do not have a significant adverse impact on access to the public highway and general road safety. Furthermore, in terms of flood risk, Policy 92 ‘Flood Risk’ requires new development to demonstrate that it will be safe for its lifetime through appropriate flood resilient and resistant design, and include the provision of safe access and egress to an area of safe refuge.

7.21.5 Policy LP 12 ‘Design Implementation’ and Policy LP 14 ‘Amenity’ of the Huntingdonshire Local Plan to 2036 require new developments to be well designed and not impact on public safety. Policy LP 17 ‘Parking Provision and Vehicle Movement’ seeks to ensure that development proposals take account of highway safety. Policy LP 5 ‘Flood Risk’ states that development should be 'safe for all' for a 1:100 annual probability flood event, for the lifetime of the development, with appropriate climate change allowances

Assessment Conclusions

7.21.6 The approach to the design of site security measures is set out in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].**

7.21.7 Section 16.4 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** summarises the potential effects of the Scheme as a result of major accidents or disasters. Furthermore, an **oBSMP [EN010141/DR/7.10]** has been prepared as part of the application. The oBSMP sets out the regulatory guidance reviewed to ensure that all safety concerns around the BESS element of the Scheme are addressed so far as is reasonably practicable such that likely significant effects would not arise.

7.21.8 **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]**, supported by **ES Vol 2 Appendix 8-1 Flood Risk Assessment**

[**EN010141/DR/6.2]** provides a review of flood risk to the Scheme and presents mitigation to manage any identified flood risk to the Site.

7.21.9 **ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1]**, supported by **ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2],** presents the findings of an assessment of the likely significant highway safety effects as a result of the Scheme.

Design and Mitigation Measures

7.21.10 The Applicant has followed the mitigation hierarchy to prevent safety and security issues, as detailed below.

7.21.11 During the construction phase, the overall management of security will rest with the Principal Contractor. All plant and materials will be secured to prevent theft and vandalism, and remote monitoring and intrusion detection is likely to be managed via the use of deterrent systems such as 'Armadillo' camera security units.

7.21.12 **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** identifies the security fencing proposed during the construction and operational phases of the development, as well as the type of lighting that would be necessary to satisfy health and safety requirements, and to ensure the welfare of those on site. **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]** also sets out the CCTV and monitoring systems that would be in place during the operational phase of development.

7.21.13 In terms of potential fire risk at the BESS compound, a comprehensive fire risk management strategy would be developed prior to construction for the BESS in line with National Fire Chiefs Council's (NFCC) recommendations. The key principles of this strategy are set out in the **oBSMP [EN010141/DR/7.10].** A full Battery Safety Management plan would be developed post DCO consent in substantial accordance with this outline, alongside an Emergency Response Plan.

7.21.14 The Site is crossed by a number of utility corridors, including high pressure gas pipelines, water mains, and overhead electrical lines. The design of the Scheme takes into account the easement and separation distances required by the owners and operators of the various utilities, as set out in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**. On the basis of the proposed approach to the design and the mitigation that would be implemented during construction, there would not be a significant likelihood of damage to utilities at the Site.

7.21.15 An Unexploded Ordnance (UXO) Desk Based Risk Assessment (Appendix E of **ES Vol 2 Appendix 12-1 [EN010141/DR/6.2]**) undertaken by a specialist consultancy (First Line Defence) has identified the potential for UXO at the Site. The **oCEMP [EN010141/DR/7.3]** sets out that a UXO Management Plan will be prepared prior to construction commencing. All works across the Site will be required to accord with the UXO Management Plan, and site-specific UXO Awareness Briefings will be given to all operatives undertaking intrusive works. Following adoption of the above embedded mitigation measures, the risk resulting from UXO would be low, and there would be no significant environmental effects resulting from the Scheme.

7.21.16 The impact of flooding and effects of the Scheme on flood risk have been assessed as part of **ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1]** and **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**. The Scheme has been designed to ensure that critical components of infrastructure would not be affected by extreme flood events and that the Scheme will not exacerbate flood risk elsewhere. The flood risk assessment concludes that there would be no significant effects as a result of flood risk, including when accounting for future climate change. In the event of flooding there would be no likely significant environmental effects resulting from the Scheme.

7.21.17 The mitigation measures proposed in relation to highway safety are set out within Section 9.7 of **ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1].** This includes the implementation of a traffic access

strategies which will be managed via the **oCTMP [EN010141/DR/7.4], oOEMP [EN010141/DR/7.5]** and **oDEMP [EN010141/DR/7.6].** The assessment concludes that the Scheme would not likely exacerbate the frequency or severity of road incidents in the local area. An overall negligible effect is concluded, which is not significant.

7.21.18 Further site and public security measures are set out within the **oCEMP [EN010141/DR/7.3]; oOEMP [EN010141/DR/7.5]**, and the **oDEMP [EN010141/DR/7.6]**.

Assessment

7.21.19 The **ES [EN010141/DR/6.1]** has been prepared based on the embedded design and mitigation measures set out above, and as such the assessments included in the ES are cognisant of all site safety and security requirements.

Appraisal

7.21.20 The NPSs and relevant local planning policy seek to ensure that proposals are designed so that any risk to the safety of the public and the wider environment is appropriately minimised and mitigated. Potential risks to safety have been identified through the development of the project and in consultation with the HSE. A comprehensive fire risk management strategy would be developed at the detailed design stage for the BESS in line with National Fire Chiefs Council's (NFCC) recommendations. The key principles of this strategy are set out in the **oBSMP [EN010141/DR/7.10].** The anticipated site-wide safety provisions are set out within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].**

7.21.21 Fencing, gates and signage would prevent unauthorised public access to construction areas, and public specific safety signage would be installed as necessary and appropriate to ensure that members of the public accessing the Site or passing through, or near to it, along the improved public rights of way are informed of any associated risks.

7.21.22 The **oCEMP [EN010141/DR/7.3]; oOEMP [EN010141/DR/7.5], and oDEMP [EN010141/DR/7.6]** collectively ensure that the Scheme would be constructed, operate and ultimately be decommissioned in accordance with the provisions of NPS EN-1, NPS EN-3 and relevant local plan policy.

7.22 Glint and Glare

Planning Policy Context

7.22.1 National policy considerations relevant to glint and glare impacts are set out within NPS EN-3, which provides specific guidance for solar developments. NPS EN-3 acknowledges that while solar panels are specifically designed to absorb light, "solar panels may reflect the sun's rays at certain angles, causing glint and glare" (paragraph 2.10.102).

7.22.2 Paragraph 2.10.103 of NPS EN-3 directs applicants to identify potential glint and glare issues for relevant receptors (such as homes, roads, and aviation) and to undertake a glint and glare assessment if necessary. If such an assessment is needed, it should quantify the geometry, duration, and intensity of reflections affecting each receptor.

7.22.3 NPS EN-3 also encourages the use of embedded mitigation such as anti-glare/anti-reflective coatings on panels to reduce reflective intensity (paragraph 2.10.134), whilst identifying that applicants may consider screening between potentially affected receptors and the panels (paragraph 2.10.135) or adjusting the azimuth angle or tilt angle of the panels (paragraph 2.10.136).

7.22.4 For decision making, paragraph 2.10.158 of NPS EN-3 confirms that the Secretary of State should consider glint and glare impacts on nearby homes, motorists, public rights of way, and aviation infrastructure.

7.22.5 Policy 57 of the Bedford Borough Local Plan requires solar development to assess and address amenity impacts including glint and glare.

Assessment Conclusions

7.22.6 An assessment of glint and glare effects was scoped out of the ES, as set out in **ES Vol 2 Appendix 4-2: East Park Energy Scoping Opinion [EN010141/DR/6.2]**. The Applicant has however prepared a standalone assessment of glint and glare impacts to demonstrate the impacts of the Scheme are acceptable, and this is presented as **ES Vol 2 Appendix 5-6: Glint and Glare Assessment [EN010141/DR/6.2]**.

Design and Mitigation Measures

7.22.7 The Applicant has followed the mitigation hierarchy to prevent glint and glare impacts, with mitigation measures set out in **ES Vol 2 Appendix 5-6: Glint and Glare Assessment [EN010141/DR/6.2]**. The required mitigation is secured by the retained and proposed planting set out in the **outline Landscape and Ecological Management Plan [EN010141/DR/7.7]**.

Assessment

7.22.8 **ES Vol 2 Appendix 5-6: Glint and Glare Assessment [EN010141/DR/6.2]** concludes that after implementing the mitigation measures, the residual glint and glare impacts would be low for all relevant receptors. There are no residual likely significant adverse effects predicted in respect of glint and glare.

Appraisal

7.22.9 The approach to glint and glare impacts is consistent with national policy set out within NPS EN-3. The Applicant has undertaken a glint and glare assessment as required by paragraph 2.10.103 of NPS EN-3 and included embedded mitigation measures as suggested by paragraphs 2.10.134-136. **ES Vol 2 Appendix 5-6: Glint and Glare Assessment [EN010141/DR/6.2]** concludes that residual glint and glare effects would be low for all receptors set out in paragraph 2.10.158 of NPS EN-3.

7.22.10 The Scheme has been appraised against relevant local plan policies within the **Policy Compliance Document [EN010141/DR/5.6].**

7.22.11 In conclusion, having regard to the relevant national and local policies on glint and glare, the Scheme is considered to be policy compliant.

7.23 Other Matters

Electromagnetic Fields

7.23.1 EN-5 (paragraph 2.9.44) recognises that power frequency electromagnetic fields arise from the generation, transmission, distribution and use of electricity, and are a result of voltages applied to electrical conductors and equipment. To prevent the potential effects on the central nervous system and microshock on contact with a ground object, the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines.

7.23.2 The East Park substation and the grid connection between the East Park substation and the Eaton Socon Substation are rated at 400 kV. Section 16.5 of **ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1]** provides a description of the typical electromagnetic fields produced by underground buried 400 kV cables. This confirms that 400 kV cables, as proposed, do not present a risk in relation to electric magnetic fields and no mitigation is required.

Sulphur Hexafluoride

7.23.3 EN-5 (paragraph 2.9.59) states that Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks. It is a potent greenhouse gas, and EN-5 states that applicants should consider whether development can be designed to avoid their use.

7.23.4 Manufacturers are however now increasingly able to offer SF6-free components, and those that do continue to use SF6 are sealed-for-life with

extremely low leakage rates. For this reason, as set out in **ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2]**, it is assumed that emissions of SF6 from the Scheme will be minimal and not material to the assessment of greenhouse gas emissions for the Scheme.

Battery Safety

7.23.5 As identified previously within Section 7.21 of this Planning Statement, an **oBSMP [EN010141/DR/7.10]** has been prepared as part of the application. The oBSMP sets out the regulatory guidance reviewed to ensure that all safety concerns around the BESS element of the Scheme are addressed so far as is reasonably practicable such that likely significant effects would not arise.

7.23.6 In terms of potential fire risk at the BESS compound, a comprehensive fire risk management strategy would be developed prior to construction for the BESS in line with National Fire Chiefs Council's (NFCC) recommendations. The key principles of this strategy are set out in the **oBSMP [EN010141/DR/7.10],** alongside measures that will be implemented for the BESS compound to ensure that should a fire or major incident occur, any contaminated pollution run-off would be contained to a lagoon to prevent discharge to nearby watercourses**.** A full Battery Safety Management plan would be developed post DCO consent in substantial accordance with the outline plan, alongside an Emergency Response Plan.

Other Consents and Licences

7.23.7 NPS EN-1 Section 4.12 deals with Pollution Control and Other Environmental Regulatory Regimes. It confirms that the planning and pollution control systems are separate but complementary. The planning system controls the development and use of land in the public interest. Pollution control is concerned with preventing and controlling pollution through the use of measures to prohibit or limit the release of substances to the environment from different sources. Paragraph 4.12.9 states that, in considering an application for DCO the Secretary of State should focus on whether the

development itself is an acceptable use of the land, and the impact of that use, rather than the control of process emissions, or discharges themselves.

7.23.8 The **Other Consents and Licences Statement [EN010141/DR/5.5]** provides information on the additional consents and licences that are or may be required to construct and operate the Scheme. It sets out those consents requiring separate approval, and those incorporated within the **draft DCO [EN010141/DR/3.1]**. It also sets out the nature of relevant consents required, key legislation in their consenting, the relevant consenting authority and the status of the consent or licence.

8.0 PLANNING BALANCE AND CONCLUSION

8.1 Introduction

8.1.1 All development delivers benefits of one form or another (otherwise development would simply not happen), and all development gives rise to harm to one degree or another (an inevitable consequence of change), but at its core the planning balance is about comparing the benefits that a proposed development would deliver against the harm that it would cause. The decision maker should then be able to arrive at a balanced judgement as to whether consent should be granted and a DCO made.

8.1.2 This section brings together the relevant legislative framework and policy context and applies them to the overall planning balance for the Scheme. It sets out the basis on which the application must be determined under the PA 2008 and the NPSs and weighs the substantial public benefits of the scheme against any residual adverse impacts.

8.2 Section 104(2) of the PA 2008

8.2.1 A DCO application is required for the Scheme. In determining such an application, Section 104 of the PA 2008 sets out the primary decision-making framework. Section 104(2) requires the Secretary of State to have regard to the following matters that are of relevance to the determination of this Order:

- Any relevant National Policy Statement (NPS);
- Any Local Impact Report (LIR) submitted by the local authority;
- Any matters prescribed in applicable legislation; and
- Any other matters which the Secretary of State considers important and relevant to the decision.

8.2.2 The relevant NPSs for this project are the Overarching NPS for Energy (NPS EN-1), the NPS for Renewable Energy Infrastructure (EN-3), and the NPS for Electricity Networks (EN-5) in respect of the grid connection. In accordance with Section 104(3) PA 2008, the application must be decided in accordance

with these NPSs except to the extent that any of the limited exceptions in Section 104(4)-(8) apply. Those exceptions include circumstances where granting consent would breach international obligations, be unlawful, or where the adverse impacts of the development would outweigh its benefits, among others. None of those exceptions are engaged in this case, as explained below, and no relevant NPS policy indicates that consent should be refused.

8.2.3 A Local Impact Report is expected to be prepared by the host local planning authority(s) (BBC, HDC and CCC) prior to examination of the application. The Applicant has had regard to the relevant local development plan policies and the National Planning Policy Framework (NPPF) as matters "important and relevant" under Section 104(2)(d). The NPPF (updated December 2024) acknowledges that it does not contain specific policies for NSIPs and that NSIP applications are determined under the PA 2008 framework. Accordingly, while local development plan policies and the NPPF provide useful context (for example, all three host authorities declaring a climate emergency and support the need for renewable energy infrastructure), these plans are afforded weight only to the extent they are relevant, and do not displace the primacy of the NPS in the decision-making process.

8.2.4 In terms of prescribed matters under Section 104(2)(c), the applicable provisions are those set out in the Infrastructure Planning (Decisions) Regulations 2010. In respect of Regulation 3 (when deciding an application which affects a listed building or it's setting the Secretary of State must have regard to the desirability of preserving the listed building). The assessment on cultural heritage confirms that the Scheme would not have any direct effects on any listed building or significantly adversely affect their setting (see Section 7.5 and **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1])**.

8.2.5 In terms of Regulation 7 (when deciding an application for development consent the Secretary of State must have regard to the United Nations Environmental Programme Convention on Biological Diversity 1992 - the conservation and enhancement of biological diversity) the relevant

assessment concludes that there would be no significant residual adverse effects for any important terrestrial ecological feature, see [Sections 7.6 and 7.7] and **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** and associated appendices.

8.2.6 This Planning Statement provides evidence of the Scheme's compliance with the policies of the NPSs, the relevant prescribed matters, other relevant planning policy, and matters that the Applicant considers are likely to be important and relevant, to inform the Secretary of State's decision as to whether to grant a DCO. The Planning Statement should also be read alongside the **Policy Compliance Document [EN010141/DR/5.4]** which demonstrates that the Scheme is compliant with all relevant policies relating to NSIPs.

8.2.7 An Environmental Impact Assessment has also been undertaken, and an Environmental Statement is submitted (**Environmental Statement [EN010141/DR/6.1 / 6.2 / 6.3]**), in compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

8.2.8 Considering the above, the planning balance should be considered in the context of the urgent national need for the Scheme and the comprehensive evidence of its impacts and benefits.

8.3 The Planning Balance

8.3.1 As set out in paragraph 4.2.15 of NPS EN-1, whilst the presumption in favour of granting development consent as CNP infrastructure, will generally outweigh any other residual impacts, it is still necessary to apply the planning balance exercise to determine whether any specific policy tests indicate that consent should be refused and with the need to weigh any adverse impacts against the overall benefits.

8.3.2 Paragraph 4.1.5 of NPS EN-1 sets out how the Secretary of State, when making a decision, will weigh; "*adverse impacts against its benefits*". The

glossary associated with NPS EN-1 confirms that in making a decision, the Secretary of State will apply the following hierarchy of weight:

- Limited.
- Moderate.
- Great.
- Significant.
- Substantial.

8.3.3 The assessment below has regard to the benefits of the scheme in Section 5 of this Planning Statement, and the planning appraisal in Section 7 in identifying the potential environmental, social and economic impacts of the Scheme, and applies the relevant planning balance using the hierarchy of weightings set out above.

Scheme Benefits

National Need

8.3.4 The Applicant has prepared the DCO application for the Scheme in accordance with the mitigation hierarchy and the Scheme meets the definition of CNP infrastructure under NPS EN-1, reflecting the urgent national priority to deliver low-carbon energy at scale.

8.3.5 NPS EN-1 (Section 4.2) makes clear that for such CNP Infrastructure, once the normal consideration of need, impacts and mitigation has been undertaken, any residual impacts are "*unlikely to outweigh the urgent need*" for the infrastructure. In all but the most exceptional cases, a CNP project is to be treated as having met any policy tests that require the outweighing of harm or demonstration of exceptionality. Accordingly, while the planning assessment must weigh benefits and harms in the usual way (as required by NPS EN-1 paragraph 4.1.5), the starting point is a very strong presumption in favour of development consent. The urgent need for new renewable energy capacity carries substantial weight in the balance (as per NPS EN-1

paragraph 3.2.7), and the Government's policy is that such need will generally outweigh residual impacts for CNP infrastructure.

Public Benefit

8.3.6 The Scheme will deliver a range of significant public benefits that address both national and local needs. On a national level, the project will make a substantial contribution towards the UK's legally binding Net Zero target and carbon budget commitments by providing nationally significant, clean and renewable electricity. It will help to contribute to energy security, by diversifying and increasing the UK's domestic energy supply (thereby reducing reliance on fossil fuels and imports) and ensuring future electricity demand can be met.

8.3.7 The Scheme would also align with, and advance, the national policy agenda for green economic growth, supporting the transition to a clean energy economy and the Government's aim of making the UK a 'Clean Energy Superpower'.

8.3.8 At the local and regional level, the Scheme will assist BBC, HDC and CCC in achieving their own climate objectives (the Councils have set differing pledges to contribute to reducing carbon emissions or achieving net zero emissions through to 2050) by substantially increasing low-carbon energy generation in the area. It will enhance local energy resilience and will bring economic benefits through significant investment in the green economy and the creation of new jobs during both its construction and operation.

8.3.9 In environmental terms, the Scheme will deliver measurable benefits in that it is designed to achieve biodiversity gains through habitat creation and ecological management. Notably the Scheme will result in a significant beneficial effect on priority habitats, due to the extensive creation of approximately 205 ha of species-diverse grassland more than 17 km of native species rich hedgerow, 19 ha of woodland and 375 individual trees as part of the landscape proposals. Throughout its operation, the Scheme would also result in a significant beneficial effect on the breeding bird assemblage and

foraging and commuting bats due to the provision of high-quality habitats as part of the landscape proposals. Whilst not a mandatory requirement for NSIPs, the Applicant has also committed to the achievement of significant quantifiable biodiversity gains comprising at least a 70% net gain in area-based habitat units, 30% net gain in hedgerow units, and 5% in watercourse units. Public access and recreation would also be improved by the Scheme; for example, new or enhanced footpath links are proposed across the Site, which will provide a recreational amenity benefit for local communities.

8.3.10 In addition to the above, the Scheme would also afford the opportunity to foster a greater understanding of the historic environment in the local environment by increasing the understanding, appreciation and experience of the historic environment within the Site and East of England in general. In particular, for the newly discovered Roman small town at Great Staughton and a newly discovered ladder settlement in the southern part of Site B.

8.3.11 Finally, the Scheme also represents an opportunity to deliver educational benefits for the local community through the provision of visitor amenity facilities and through community involvement in archaeological survey and fieldwork. More widely, the Scheme would also contribute to research and innovation on the integration of agriculture and solar generation as part of the Applicant's partnership with Rothamsted and creation of an Agrisolar Research Area.

8.3.12 The benefits of the Scheme and the relative weight that should be attached to each in the overall planning balance are summarised in Table 3 below. The weight that has been applied to the scheme benefits is based upon planning judgement using the criterion set out in the glossary to NPS EN-1 (referenced in paragraph 8.3.2 above).

Table 3: Scheme Benefits

Scheme Benefit	Weighting
Contribution to achieving statutory net zero targets by reducing carbon emissions and addressing the global challenge of climate change.	Substantial
Contribution to increasing energy security.	Substantial
Contribution to delivering on the national green economic growth agenda and making the UK a 'Clean Energy Superpower'.	Substantial
Contribution to increasing electricity generation to meet future demand and ensure the 'lights stay on'.	Substantial
Contribution to achieving carbon neutrality within the local authority areas.	Significant
Ecology and Nature Conservation - Delivering nature conservation benefits and a significant biodiversity net gain.	Significant
Socio-economic - Contribution to local economic security through investment in the green economy and job creation.	Great
Heritage - Contribution to a greater understanding of the historic environment.	Moderate
Land and Soils - Contribution to research and innovation on integrating agriculture and solar generation through the partnership with Rothamsted and creation of an Agrisolar Research Area.	Limited
Land and Soils - Improvements to the condition of soils at the point of decommissioning the Scheme	Limited
Delivering enhanced access and recreation opportunities across the Site; and	Limited
Delivering educational benefits through the provision of visitor amenity features	Limited

8.3.13 In short, the Scheme will deliver numerous benefits across climate change, energy security, economic growth, and environmental enhancement categories, as detailed in Sections 2 and 5 of this Planning Statement. Individually a number of these benefits Taken together, these benefits carry substantial weight in favour of the application.

Adverse Effects

8.3.14 This section sets out the adverse effects of the scheme which should be set against the Scheme benefits in the planning balance. The adverse effects are set out under a series of topic headings followed by a tabulated summary of the effects and a judgment on their respective weight in the planning balance.

Landscape and Visual Amenity

8.3.15 **ES Vol 1 Chapter 5: Landscape and Visual ('the LVIA') [EN010141/DR/6.1]** has evaluated the effects of the Scheme on landscape character and visual receptors.

8.3.16 There are no national or local landscape designations within or immediately around the Site with the nearest (Chilterns National Landscape) approximately 30km from the Site.

8.3.17 The Site lies on the south side of a broad, shallow clay vale formed by a series of west–east tributaries that drain towards the River Great Ouse, which runs north–south to the east through St Neots. Within this vale the Order Limits occupy predominantly low-lying ground with relatively limited topographic variation when compared with the more undulating land beyond. This landform context, together with intervening vegetation, plays a primary role in containing views towards the Site and in controlling the depth and breadth of intervisibility from the surrounding area.

8.3.18 In general, outward views from village edges are filtered or screened by perimeter tree belts and slight landform undulations. Where views are available, they tend to be glimpsed from upper storeys or through gaps in vegetation, with ground-level views more restricted. Views from the open

countryside vary with enclosure. Some rights of way run within hedged corridors or along breaks of slope that confine the view whilst others occupy more open locations on subtle rises, where longer-distance views of the Site and other landscape features (church towers / spires) are available.

8.3.19 **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 within or 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. Residual significant visual effects that remain in Year 10 are associated with public rights of way in closest proximity to the Scheme, and some more elevated views within 1km of the Site.

8.3.20 The DCO will secure a 40-year operational period, after which all solar arrays and equipment will be decommissioned and removed. This means that any landscape and visual effects would be temporary, and the landscape would be restored in the long term.

8.3.21 The outcome of the assessment is consistent with NPS EN-1, which acknowledges that major energy projects are "*likely to have visual effects for many receptors around proposed sites*" (paragraph 5.10.13) and that the Secretary of State should "*judge whether the visual effects on sensitive receptors… outweigh the benefits of the project*" (paragraph 5.10.14).

8.3.22 With the above in mind, in overall terms, given the modest magnitude and largely confined extent of the landscape / visual effects (and their reversible nature), based upon professional judgment, the harm to landscape and visual amenity should carry great weight in the planning balance, whereas the need and benefits of the project collectively and in many cases, individually, carry substantial weight.

8.3.23 As set out in Section 7.4 above, the Applicant's assessment concludes that these substantial benefits would decisively outweigh the limited landscape

and visual harm identified. There are, therefore, no landscape and visual grounds that would justify refusing development consent for the Scheme.

Heritage

8.3.24 The Applicant's heritage assessment **ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]** concludes that the only physical / direct harm to heritage assets is the potential for construction phase impacts on buried archaeology in the AAC's as a result of tree and hedgerow planting. The only other impacts relate to potential changes in setting (i.e. views) for certain assets. The assessment confirms that, following the implementation of mitigation measures, no significant residual direct effects are anticipated from the construction phase of the Scheme. Whilst some temporary significant adverse construction-phase setting effects would occur, they would cease once construction ends.

8.3.25 During the operational phase there would be a moderate adverse (significant in EIA terms) effect to a non-designated possible moated site in East Park Site D as a result of a change to its setting. Effects to all other heritage assets would be at worst minor adverse (not significant in EIA terms).

8.3.26 All potential heritage setting effects were judged to fall into the category of "*less than substantial harm*" (in most cases at the lower end of less-than-substantial and none at upper end) to the significance of the affected heritage assets.

8.3.27 In policy terms, '*great weight*' is afforded to the conservation of designated heritage assets (NPS EN-1 paragraph 5.9.27). The ES identifies only minor adverse (and not significant in EIA terms) operational setting effects for designated heritage assets, amounting to less than substantial harm. In accordance with NPS EN-1 paragraph 5.9.32, these harms must be weighed against the public benefits of the Scheme. The substantial public benefits of the Scheme (summarised in Table 3 above) decisively outweigh the less than substantial harm (which is assessed as being towards the lower end of the spectrum).

8.3.28 For non-designated heritage assets, NPS EN-1 paragraph 5.9.33 requires a balanced judgement. The Scheme gives rise to a moderate adverse (significant in EIA term) operational setting effect on a possible moated site. Against this harm, the balance includes the urgent need for renewable energy generation (which is afforded substantial weight at paragraph 3.2.6 of NPS EN-1), and the secured enhancements that will deliver public benefit. The benefits of the Scheme are, again, considered to decisively outweigh this harm.

8.3.29 The Scheme is CNP Infrastructure and as set out above has followed the mitigation hierarchy through the design and EIA process. Therefore, in accordance with paragraph 4.2.16 of NPS EN-1 the Scheme should be treated as meeting the requirements of paragraphs 5.9.32, 5.9.33, and any other relevant local planning policy. This is confirmed in the **Policy Compliance Document [EN010141/DR/5.4].**

8.3.30 The time-limited nature of the consent (forty years) and reversibility of the Scheme is a further important consideration, as set out in paragraph 2.10.160 of NPS EN-3.

8.3.31 Based upon the Applicant's assessment it is clear that the substantial need and benefits of the Scheme would clearly and decisively outweigh the limited less than substantial heritage harm identified. There are, therefore, no heritage grounds that would justify refusing development consent for the Scheme.

Ecology and Nature Conservation

8.3.32 The Applicant has taken an environmentally led approach to masterplanning the Scheme from inception, as reported in the **Design Approach Document [EN010141/DR/5.6]**. This has included identifying specific constraints of the Site from the outset, the condition and type of habitats present, and the species that these habitats support, or could support. By retaining existing habitats and supplementing them with complimentary habitats, a holistic approach has been taken to ecosystem enhancement and habitat

connectivity with enhancements such as enhanced recreational access delivering wider environmental benefits.

8.3.33 Comprehensive ecological surveys have been undertaken across the Site to identify ecological species and habitats that could be impacted by the Scheme. The ecological baseline of the site is set out in **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** and associated appendices, particularly **ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2]**. The Site contains no international, national or local statutorily designated nature conservation site, although some are located within 5km.

8.3.34 **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** draws the following overall conclusions regarding the residual effects of the Scheme on habitats and species.

- Taking into account all embedded and additional mitigation measures the Scheme would not result in any significant residual adverse effects upon ecological receptors at any phase (construction, operation or decommissioning).
- During the construction phase the Scheme would result in short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage, amphibians (including great crested newt) and otter. However, those effects would not be significant in EIA terms.
- During the operational phase the Scheme would result in significant beneficial effects on priority habitats, breeding birds and on foraging and commuting bats and beneficial (not significant) effects for other ecological receptors. The benefits would be realised for the duration of the Scheme's operational lifespan (40 years).
- During the operational phase the Scheme would also result in non-significant beneficial effects to on-site habitats; roosting bats; amphibians; reptiles; and other notable species (including flora, invertebrates, mammals and fish). The benefits would be realised for the duration of the Scheme's operational lifespan (40 years).

8.3.35 The Applicant has planned to achieve environmental gains from the outset of the Scheme.

8.3.36 Whist it is not currently a mandatory requirement for NSIP Schemes, the Applicant is committed to maximising BNG as far as practicable (as per Design Principle 4.1 secured by the **Design Parameters and Principles Statement [EN010141/DR/7.1]**). In this regard, the Applicant has prepared BNG Report **[EN010141/DR/7.17]** which sets out the BNG that could be achieved at the site where the outline proposals for landscape and ecological enhancement to be put in place. Whilst slightly lower than the figures in the BNG report, the Applicant is a is electing to claim and commit to a considerable future BNG of:

- 70% net gain in area-based habitat units;
- 30% net gain in hedgerow units; and
- 5% in watercourse units.

8.3.37 In summary, the ecological impacts of the proposal have been fully addressed through avoidance, mitigation, and enhancement. The short-term ecological disturbances (e.g. to bird habitat during construction) which are afforded limited weight, should be set against the long-term ecological net benefits on priority habitats, breeding birds and on foraging and commuting bats, that are positive and should be afforded significant weight in their own right. They should also be measured against the other less significant beneficial effects on ecological receptors including habitats; roosting bats; amphibians; reptiles; and other notable species (including flora, invertebrates, mammals and fish) which r should be afforded moderate weight in the planning balance.

8.3.38 The ecological benefits would be realised for the duration of the Scheme's operational lifespan (40 years).

Land and Soils

8.3.39 The Scheme has followed the mitigation hierarchy and the locational requirements of NPS EN-3 to avoid impacts on land of a higher agricultural

value where possible, beginning with the site selection stage reported in **ES Vol 2 Appendix 3-1: Site Identification Report [EN010141/DR/6.2]**.

8.3.40 The ALC survey confirmed that the Site comprises a mix of Grade 2 (very good), Grade 3a (good) and Grade 3b (moderate) agricultural land. The ALC distribution reported in Table 13.8 of E**S Chapter 13: Land and Soils [EN010141/DR/6.1]** is as follows:

- Grade 2 - 164.0 ha (21.2%);
- Grade 3a - 349.5 ha (45.2%); and
- Grade 3b - 182.4 ha (23.6%).

8.3.41 There are also small areas of the Site classed as ungraded and non-agricultural, and the ungraded land has been treated as Grade 2 for environmental assessment purposes.

8.3.42 **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]** concludes that there would be a moderate adverse and significant effect in relation to temporary and permanent impacts to Grade 2 agricultural land resulting primarily from the removal of land from arable agricultural production for the duration of the Scheme and the creation of access tracks across the Site. In total, 1.40 hectares of Grade 2 and 'Ungraded' land would be permanently adversely affected by the Scheme; this is largely distributed across the Site in narrow strips relating to access tracks which are generally up to 4m wide, and the footprint of transformers. There would also be temporary and permanent adverse impacts to Grade 3a land, which is best and most versatile, but in isolation, the effect to Grade 3a land would be minor adverse which is not significant in EIA terms.

8.3.43 In total, the Scheme would result in permanent adverse impact to approximately 5.76 hectares of best and most versatile land. The remainder of the best and most versatile (Grade 2 and Grade 3a) land within the Site would not be permanently adversely impacted by the Scheme and could be easily reverted to its existing agricultural condition upon completion, with anticipated benefits in relation to soil structure and resources.

8.3.44 Whilst there would be modest impacts on best and most versatile agricultural land during the construction phase the operational phase of the Scheme is expected to give rise to significant beneficial effect to soil resources. These significant beneficial effects would arise as a result of the agricultural land being rested from arable rotation. There would also be an improvement in soil functions by increasing ecosystem services including carbon sequestration to remove carbon from the atmosphere and increase soil organic carbon and reduce water run-off and siltation compared to periods where soils would be bare during arable rotation.

8.3.45 The very limited permanent loss of best and most versatile land as a result of the Scheme should only be afforded limited weight in the planning balance whilst limited positive weight should be afforded to the condition of soils following the operational phase.

8.3.46 It is considered that any limited negative weight that should be given to the harm to agricultural land and soils is clearly outweighed by the substantial positive weight that should be afforded to the need and benefits of the Scheme. This conclusion is wholly consistent with the decision making in other recent SoS decisions on solar NSIPs that have resulted in the temporary and permanent loss of BMV land (see Table 2, BMV Land for Other Solar NSIPs, above).

Other Environmental Considerations

8.3.47 All other potential environmental effects of the Scheme have been assessed within the ES, and no unacceptable adverse impacts have been identified. Topics such as noise, traffic, air quality, flood risk, ground conditions and socio-economics have been evaluated and found to have no significant residual adverse effects.

8.3.48 A series of control documents (e.g. **outline Construction Environmental Management Plan [EN010141/DR/7.3]**) have been prepared as part of the DCO submission and all will be formalised into final agreed versions via requirements to the DCO. These documents will govern the construction,

operation and decommissioning phases to control noise, dust and traffic and collectively they will ensure that the Scheme's localised environmental impacts are properly controlled and mitigated.

8.3.49 There are no significant residual adverse effects remaining, and no conflict with relevant environmental protection policies that would outweigh the clear benefits of the project.

8.3.50 The negative effects of the Scheme and the relative weight that should be attached to each in the overall planning balance are summarised in Table 4 below. The weighting has been established using planning judgement based upon the analysis of the nature and extent of the adverse effects of the Scheme.

Table 4: Adverse Effects of the Scheme

Topic	Weighting
Visual Effects on PRoWs and Residential Properties	Great
Effects on Landscape Character	Great
Heritage - designated assets	Great
Heritage - non-designated assets	Limited
Land and soils	Limited
Ecology and nature conservation – Temporary Construction Phase	Limited
Hydrology / flood risk	Neutral
Traffic and transport – Temporary Construction Phase	Limited
Noise and vibration	Limited
Air quality	Neutral

Topic	Weighting
Ground conditions	Neutral
Socio-economic - Tourism, Private and community assets and Development Land	Neutral
Human health	Neutral
Waste	Neutral
Major accidents	Neutral
Electromagnetic fields	Neutral

Summary of Planning Balance

8.3.51 When all the above factors are weighed together, the planning balance strongly supports the grant of a DCO for the Scheme. It would address an urgent national infrastructure need for clean energy, contributing substantially to climate change targets, improving energy security. The Scheme would also provide an array of other public benefits including the provision of local economic and environmental enhancements and educational opportunities. In its totality the need and benefits of the Scheme should carry substantial positive weight in decision making. Set against these benefits, the potential harms of the development are, in the most part, limited in extent, nature, and duration. Any residual adverse impacts (for example, a degree of visual change for nearby footpath users, or minor setting effects on heritage assets) have been mitigated to acceptable levels. These are all given between neutral to great weight and in all cases, either individually or collectively, this impact is demonstrably outweighed by the benefits when applying the tests of the NPS.

8.3.52 The temporary and reversible nature of the proposal (a 40-year operational life with full land restoration thereafter) further tempers the weight of any harm.

8.3.53 In policy terms, the application accords with the relevant NPSs (NPS EN-1, NPS EN-3, NPS EN-5) and there are no specific NPS policies that indicate refusal. NPS EN-1 includes a presumption in favour of the development given the urgent national need. None of the restrictive grounds in Section 104(4)-(8) PA 2008 would apply, as follows:

- Breach of international obligations – given the baseline characteristics of the Site, the residual effects of the Scheme, and its beneficial climate change impact, there is no reason to conclude that, in deciding the application in accordance with the NPSs that there would be such a breach.
- Breach of any enactment – given the residual effects of the Scheme, there is no reason to conclude that, in deciding the application in accordance with the NPSs that there would be such a breach.
- Unlawful by virtue of any enactment – given the residual effects of the Scheme, there is no reason to conclude that, in deciding the application in accordance with the NPSs would be unlawful due to any enactment.
- Adverse impacts would outweigh its benefits – the Planning Statement and accompanying documents demonstrate beyond doubt that the need and benefits of the Scheme are very significant. The ES and accompanying documents demonstrate that, subject to the embedded and additional mitigation measures proposed, the Scheme would give rise to limited impacts and consequential harm. There are no reasons to conclude therefore that the adverse impacts would outweigh its benefits.
- Any condition prescribed for deciding an application otherwise than in accordance with a NPS is met – no matters are so prescribed.

8.3.54 There exists no breach of international obligations or law, and the adverse impacts would not outweigh the benefits. By contrast the benefits of the Scheme are substantial leading to an overwhelming balance in favour of granting development consent. In terms of Section 104(7), the benefits of the

Scheme clearly and decisively outweigh the limited and localised adverse impacts.

8.4 Conclusion

8.4.1 NPS EN-1 sets out national policy for energy infrastructure of the type proposed. Paragraph 4.1.3 states that; "*Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent for applications for energy NSIPs*."

8.4.2 This Planning Statement and the separately submitted **Policy Compliance Document [EN010141/DR/5.6]**) demonstrate that the Scheme is in accordance with NPS EN-1 paragraph 4.1.3. Furthermore, there is specific further presumption at paragraph 4.1.7 that the urgent need for CNP infrastructure, which includes solar of the type proposed, will; "…*in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy*."

8.4.3 Section 104 of the PA 2008 sets out the matters which the SoS must have regard to in deciding an application where NPSs have effect. The application has been assessed against each of the relevant matters in Section 104(2). None of the limited exceptions in Section 104(4)-(8) apply. The adverse impacts that should be afforded limited weight against the Scheme are limited to residual visual amenity impact on a limited number of footpath users, less than substantial harm to a very limited number of heritage assets and limited permanent loss of Grade 2 best and most versatile agricultural land. These impacts are significantly outweighed by the very substantial public interest and wider benefits of the Scheme.

8.4.4 The Scheme will help meet the urgent and critical need to bring forward large scale solar development to meet the targets for decarbonisation and net zero, and help to provide resilience, security and affordability to electricity supplies. There is a clear and demonstrable need for the Scheme that will deliver

national and local economic, social and environmental benefits in accordance with the Government objectives to deliver sustainable development.

8.4.5 The analysis demonstrates that the Scheme complies with national planning policy and other local policy taken as a whole, both by virtue of the benefits it delivers and as a result of its design and site selection. In terms of the overall planning balance, the clear and substantial national and local benefits demonstrably outweigh the limited adverse effects that would be localised, short-term, and/or reversible at the end of the Scheme's lifetime.

8.4.6 The Planning Statement (and the separately submitted **Policy Compliance Document [EN010141/DR/5.6]**) has demonstrated that the Scheme is in accordance with relevant national and local policy. Given the urgent need for large scale solar development and substantial benefits of the proposal, there exists a clear and compelling case for the DCO to be made.

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EAST PARK ENERGY

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Planning Statement

Appendix A: Relevant Planning History

Document Reference: EN010141/DR/5.3

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(q)

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1.0 RELEVANT PLANNING HISTORY

1.1.1 The relevant planning history within the Order Limits for the Scheme is set out in Table 1 on the following page.

Table A1: Relevant Planning History

Location	Local Planning Authority (Bedford Borough Council – BBC) (Huntingdonshire District Council – HDC)	Application Reference	Description	Decision
East Park Site A	BBC	23/02048/M73	Development of a solar farm to include photovoltaic panels, inverters and substation, with access and associated infrastructure, including a variation of condition no. 2 and no. 7 pursuant to LPA reference 14/00986/MAF, as amended by LPA reference 15/03010/NMA, to allow for an increase of the period that the solar farm is permitted to operate for and alterations to the proposed on site landscaping.	Grant Permission
East Park Site B	BBC	08/00380/HDG	Remove 150 metres of hedgerow to south of farmhouse to improve agricultural management.	Retention Notice Not Issued - Approval
Cable corridor between Site B and Site C	HDC	24/01862/AGDET	Erection General Purpose Agricultural Shed	Approved
Cable corridor between Site B and Site C	HDC	0802157AGDET	Erection of agricultural storage building	Approved

Cable corridor between Site B and Site C	HDC	24/02336/S73	Variation of Condition 2 (Approved plans) and Condition 9 (Hours of deliveries or dispatches) for 17/00764/FUL	Approved
Cable corridor between Site B and Site C	HDC	19/80326/COND	Conditional Information for 17/00764/FUL: C3 (SWD scheme), C4 (maintenance of SWD), C5 (Foul Water Strategy), C6 (WSI Archaeology), C7 (Landscape management plan),	Condition Reply
Cable corridor between Site B and Site C	HDC	17/00764/FUL	Proposed warehouse/office development including ancillary landscaping	Approved
Cable corridor between Site B and Site C	HDC	1200153FUL	Change of use of existing building to a micro brewery from class (B8) to class (B2)	Approved
Cable corridor between Site B and Site C	HDC	16/00799/FUL	Change of Use from Agricultural Barn to B2 (workshop/motor repairs) and other associated work	Approved
Cable corridor between Site B and Site C	HDC	1100308FUL	Change of use of existing agricultural building to storage of agricultural products, formation and landscaping of new access to highway and garden cottage.	Approved

East Park Site C	HDC	0500948FUL	Erection of 25 metre slimline mast containing three cross polar antennas, two transmission dishes and six equipment cabinets inside a compound	Approved
East Park Site C	HDC	21/70043/FUL	Replacement of dilapidated agricultural barn with new agricultural barn	Approved
Main Access Site	HDC	23/00016/HHFUL	Erection of single storey rear extension	Approved
Main Access Site	HDC	1300738FUL	Change of use of office to residential accommodation	Approved
Main Access Site	HDC	23/00555/FUL	Full application for external changes to barn following prior approval application ref. 22/01560/P3MPA for change of use of part of an agricultural barn to a commercial use	Approved
Main Access Site	HDC	22/01560/P3MPA	Prior approval application for the change of use of part of an agricultural barn to a commercial Class E (commercial) use under Class R, Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (As Amended).	Approved
Cable corridor Site D to East Socon Substation	HDC	15/00940/FUL	Installation of a 40mw solar farm at land adjacent to Top Farm, (High Wood) and land at Little Staughton Airfield. To include for perimeter fencing, access tracks, transformer stations and associated infrastructure.	Approved
Cable corridor Site D to East	HDC	17/02538/S73	Variation of condition 3 of planning permission 15/00940/FUL to extend the period of the life of the solar farm from 25 years to 40 years.	Approved

Socon Substation				
Cable corridor Site D to East Socon Substation	HDC	18/70010/SCRE	EIA SCREENING OPINION - To extend the life of a previously consented 40mw solar from 25 years to 40 years. Variation of condition application: 17/02538/S73 Land at Little Staughton (MK44 2BN) and land at Top Farm Staploe PE19 5JB	Unknown
Cable corridor Site D to East Socon Substation	HDC	17/80295/COND	Condition information for 15/00940/FUL - C7 (Access track), C8 (Highway condition survey), C20 (Transformer/Inverter Station materials), C21 (plant building materials) and C23 (tree and hedgerow protection scheme).	Condition Reply
Cable corridor Site D to East Socon Substation	HDC	18/00064/NMA	Amendment to planning permission 15/00940/FUL Condition No 16 to vary the timing of implementation for soft planting.	Approved
Cable corridor Site D to East Socon Substation	HDC	18/02145/S73	Application to vary conditions 1, 10, 14, 15, 22 and 24 of planning permission 17/02538/S73 and to remove conditions 11, 19, 20 and 29 of planning permission 17/02538/S73 for the installation of a 40mw solar farm at land adjacent to Top Farm, (High Wood) and land at Little Staughton Airfield. To include for perimeter fencing, access tracks, transformer stations and associated infrastructure.	Approved
Cable corridor Site D to East	HDC	22/02269/S73	Variation of conditions 1 (approved plans), 14 (LEMP), 15 (Soft Landscaping), 17 (Fence colour) and 24 (Archaeology) of 18/02145/S73 to vary the approved panels, drainage	Approved

Socon Substation			arrangements, landscaping and ecology management, fence colour and treatment of service cables.	
Cable corridor Site D to East Socon Substation	HDC	22/01813/FUL	Installation of solar farm (generating up to 50MW) comprising the provision of photovoltaic panels, inverters, switchgear housings and transformer stations together with hardstanding, landscaping, access alterations, fencing and associated works	Approved
Cable corridor Site D to East Socon Substation	HDC	25/00891/FUL	Change of use to operational land, extension to existing substation alongside fencing and associated works.	In progress

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Appendix B: Mineral Safeguarding Report

Document Reference: EN010141/DR/5.3

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(q)

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Appendix B: Mineral Safeguarding Report

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/5.3
Author:	Axis PED Ltd

Version	Date	Status
P01	September 2025	DCO Submission

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1.0 INTRODUCTION

1.1 Background to the Scheme

1.1.1 This Minerals Assessment has been prepared on behalf of BSSL Cambsbed 1 Ltd (the 'Applicant') in relation to an application for a Development Consent Order (DCO) for the East Park Energy Project ('the Scheme'). The application for development consent will be submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for the Department for Energy Security and Net Zero (hereafter referred to as the 'Secretary of State') pursuant to the Planning Act 2008.

1.1.2 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site BESS on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

1.1.3 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

1.1.4 The **Location Plan [EN010141/DR/2.1]** shows the Order Limits, which contains approximately 773 hectares (ha) of land within Bedford Borough Council (BBC) and Huntingdonshire District Council (HDC).

1.1.5 The design of the Scheme has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The location of the Scheme is shown in **ES Vol 3, Figure 1-1: Site Location [EN010141/DR/6.3]** and described in **ES Vol 1, Chapter 1: Introduction [EN010141/DR/6.1]**, with the consideration of alternatives and the evolution

of the design of the Scheme presented in **ES Vol 1, Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]**.

1.1.6 A more detailed description of the Scheme is contained within Chapter 4.0 of the **Planning Statement [EN010141/DR/5.3]** and in the **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

1.1.7 The Scheme will be determined pursuant to Section 104 of the PA 2008, which states that the Secretary of State must have regard to the following in deciding an application for development consent:

- Any relevant national policy statement (NPS) (Section 104(2)(a) of the PA 2008);
- The appropriate marine policy documents (if any) determined in accordance with Section 59 of the Marine and Coastal Access Act 2009 (Section 104(2)(aa) of the PA 2008);
- Any Local Impact Report (Section 104(2)(b) of the PA 2008);
- Any matters prescribed (Section 104(2)(c) of the PA 2008); and
- Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision (Section 104(2)(d) of the PA 2008).

1.1.8 Solar photovoltaic generation is covered by the NPS for Renewable Energy Infrastructure (EN-3), with energy storage recognised as associated infrastructure. Other NPS's of relevance to the Scheme comprise:

- Overarching National Policy Statement for Energy (EN-1); and
- National Policy Statement for Electricity Networks Infrastructure (EN-5) in light of the grid connection.

1.1.9 This report has therefore been prepared with regard to NPS EN-1, NPS EN-3, NPS EN-5, and important and relevant considerations such as the Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies (January 2014, and the

Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (July 2021).

1.2 Minerals Context

1.2.1 BBC and CCC are the Minerals Planning Authorities relevant to the Order Limits.

1.2.2 The Order Limits lie partially within areas that have been allocated by BBC and CCC as Mineral Safeguarding Areas (MSAs). Development within the MSAs is subject to the requirements of relevant Minerals policies, discussed further in Section 2. This includes a requirement to prepare a Minerals Assessment, which is contained within this report.

1.2.3 Consultation has been held with BBC, HDC and CCC with regard to the scope of the Minerals Assessment.

1.3 Purpose of the Report

1.3.1 The purpose of this Minerals Assessment is to address the requirement of national and local policies relating to minerals, and provides an assessment of the impact of the Scheme on the safeguarded minerals resource. The report is structured as follows:

- Section 2 provides a review of relevant national and local minerals policies;
- Section 3 provides an assessment of impact of the Scheme on minerals resource; and
- Section 4 presents the conclusions of the assessment.

2.0 MINERALS POLICY REVIEW

2.1.1 The Scheme constitutes a Nationally Significant Infrastructure Project (NSIP) development in accordance with the Planning Act 2008 (PA 2008), as it comprises the construction of a generating station (Part 3, Section 14(1)(a) of the PA 2008) with a capacity of more than 50MW (Part 3, Section 15(2)(c)).

2.1.2 The Scheme will therefore be determined pursuant to Section 104 of PA 2008. NPS EN-1, NPS EN-3, and NPS EN-5 are the relevant National Policy Statements in this case.

2.1.3 Paragraph 5.11.19 of NPS EN-1 states,

> *"Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place".*

2.1.4 While the relevant NPSs are the primary basis for decisions on applications for development consent, the Secretary of State may consider other matters important and relevant to decision-making, such as the development plan policies of the host local authorities.

2.1.5 The relevant mineral safeguarding policies in this case are contained within the Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies, adopted in 2014, and the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036, adopted in 2021.

2.2 National Policy Statements

Overarching National Policy Statement for Energy (EN-1) (November 2023)

2.2.1 The Overarching NPS for Energy (EN-1) (November 2023), sets out the current national policy for delivering NSIP energy infrastructure in England and Wales.

2.2.2 NPS EN-1 Paragraph 5.11.19 states:

> *"Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place."*

2.2.3 Paragraph 5.11.28 states:

> *"Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), appropriate mitigation measures to safeguard mineral resources should be put in place to safeguard mineral resources."*

National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)

2.2.4 The Revised NPS EN-3, published by in November 2023, introduces a new section (Section 2.10) on solar photovoltaic generation. This section recognises that Solar Farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation worldwide. There are no specific references to mineral safeguarding in NPS EN-3.

2.3 National Planning Policy Framework (NPPF) (December 2024)

2.3.1 Paragraph 222 of the NPPF highlights that:

"it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation."

2.3.2 To meet this objective, Paragraph 223 of the NPPF sets out that planning policies should safeguard mineral resources by defining MSAs and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development, where this should be avoided. Paragraph 223 goes on to state that planning policies should be set out to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place; and should safeguard existing, planned and potential sites for:

"the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material".

2.4 National Planning Practice Guidance (PPG)

Minerals PPG (2014)

2.4.1 The Minerals PPG (2014) confirms that minerals *"make an essential contribution to the Country's prosperity and quality of life"* (Paragraph 001). Paragraph 007 of the Minerals PPG states that:

"Mineral planning authorities are encouraged to plan for minerals extraction using Ordnance Survey-based proposals maps and relevant evidence provided by the minerals industry and other appropriate bodies… This approach will allow mineral planning authorities to highlight areas where mineral extraction is expected to

take place, as well as managing potentially conflicting objective for use of land."

2.5 Local Policy

Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan (January 2014)

2.5.1 The Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP: SSP) sets out an overall vision of how the area should develop in respect of minerals extraction and waste management developments, sets out strategic objectives setting out how the Plan will implement the visions and an implementation strategy for achieving these objectives.

2.5.2 The Policies Map to support the MWLP: SSP identifies the MSA's, the boundaries of which have been reproduced in **ES Vol 3 Figure 13-5: Mineral Safeguarding Areas [EN010141/DR/6.3]**.

2.5.3 Policy MSP 11 'Mineral Resource Assessment' of the MWLP: SSP states that:

> *"Surface development proposals within a Mineral Safeguarding Area (excluding exemptions set out under policy MSP12: Surface Development within a Mineral Safeguarding Area) shall be accompanied by a Minerals Resource Assessment. This shall be undertaken by a suitably qualified professional, which establishes through site specific geological survey data, the existence or otherwise of a mineral resource of economic importance."*

2.5.4 Policy MSP 12 'Surface Development within an MSA' of the MWLP: SSP states that surface development will only be permitted within a MSA where it is demonstrated that:

- *"The mineral concerned is proven to be of no economic value as a result of the undertaking of the Mineral Resource Assessment; or*
- *The development will not inhibit extraction if required in the future; or*

- *There is an overriding need for the development and prior extraction cannot reasonably be undertaken; or*
- *The mineral can be extracted prior to the development taking place."*

2.5.5 There are a number of development types listed within Policy MSP 12, in which Policies MSP11 and MSP12 do not apply. None of the development types listed are relevant to the Scheme.

Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (July 2021)

2.5.6 The Cambridgeshire and Peterborough Minerals and Waste Local Plan sets out the vision, scale and broad location for future minerals and waste management development to 2036.

2.5.7 Policy 5 'Mineral Safeguarding Areas (MSA)' states that MSAs are identified on the Policies Map for mineral resources of local and / or national importance. It then goes on to state that the Mineral Planning Authority must be consulted on all development proposals in these areas except:

a) *"development that falls within a settlement boundary,*
b) *development which is consistent with an allocation in the Development Plan for the area;*
c) *minor householder development within the immediate curtilage of an existing residential building;*
d) *demolition or replacement of residential buildings;*
e) *temporary structures;*
f) *advertisements;*
g) *listed building consent; and*
h) *works to trees or removal of hedgerows."*

2.5.8 Policy 5 also identifies that development within MSAs not covered by the exceptions will only be permitted where it has been demonstrated that:

i) *"the mineral can be extracted where practicable prior to development taking place; or*

j) *the mineral concerned is demonstrated to not be of current or future value; or*

k) *the development will not prejudice future extraction of the mineral; or*

l) *there is an overriding need for the development (where prior extraction is not feasible)."*

2.6 Industry Guidance

Mineral Safeguarding in England: Good Practice Advice, British Geological Survey Open Report OR/11/046 (2011)

2.6.1 The Minerals PPG (Paragraph: 003 Reference ID: 27-003-20140306) makes reference to the Mineral Safeguarding in England: Good Practice Advice for detailed advice on mineral safeguarding.

2.6.2 The Good Practice Advice guidance states that an MSA neither precludes other forms of development permitted nor conveys any presumption that the mineral will be worked. MSAs simply provide a policy tool which will be alert to the fact that minerals may be sterilised by the proposed non-mineral development and that this should be taken into account in the planning process.

3.0 ASSESSMENT OF THE IMPACT OF THE SCHEME ON MINERAL RESOURCES

3.1.1 This section identifies the mineral-related policy allocations relevant to the Order Limits. It considers the potential for the Scheme to impact on the supply of mineral reserves following a review of the local policy on landbanks. It then considers the potential impact of the Scheme on safeguarded minerals in line with policy requirements protecting MSAs.

3.1.2 The National Planning Policy Framework requires local authorities to define mineral safeguarding areas to protect the known locations of specific minerals from sterilisation. The local authority must also define mineral consultation areas based on the safeguarding areas. The Scheme lies within the following MSAs across Bedford and Cambridgeshire (see **ES Vol 3 Figure 13-5: Mineral Safeguarding Areas [EN010141/DR/6.3]**):

- **East Park Site A** – northern and eastern extents are located within Bedford's River Valley / Glacial Sand and Gravel MSA;
- **East Park Site B** – northern extents are located within Bedford's River Valley / Glacial Sand and Gravel MSA;
- **East Park Site C** – northern extent within Cambridgeshire's Sand and Gravel / Brickclay MSAs;
- **East Park Site D** – not within a MSA;
- **Cable Corridor (Site B to Site C)** – within Cambridgeshire's Brickclay MSA;
- **Cable Corridor (Site C to Site D)** – not within a MSA; and
- **Grid Connection to Eaton Socon Substation** – not within a MSA.

3.1.3 As identified previously, in line with local minerals policy, a Minerals Assessment is required for development within MSAs.

3.2 Impact on the Supply of Minerals

3.2.1 Consideration is given to the availability of permitted reserves of minerals in Bedford and Cambridge in order to assess whether the Scheme may prevent a sufficient supply of minerals from coming forward.

3.2.2 A landbank is a stock of planning permissions for mineral extraction. The government requires Mineral Planning Authorities to have landbanks for aggregates and raw industrial minerals.

3.2.3 Landbanks are principally a monitoring tool to provide an early indication of possible disruption to the provision of an adequate and steady supply of minerals and indicate when new permissions are likely to be needed.

3.3 River Valley / Glacial Sand and Gravel MSA (Bedford Borough)

3.3.1 Mineral Strategy Policy MSP 1 of the MWLP: SSP states that: *"Aggregate minerals will be sourced from the river valley sands and gravels of the Lower Ouse and Ivel Valleys, the glacial sands and gravels of the Biggleswade area, and the Cretaceous sands of the Greensand Ridge."* The policy then goes on to identify a number of strategic mineral sites for the supply of aggregate sand and gravel. The Scheme does not fall within the boundary of any identified strategic mineral site. Paragraph 6.5 of the MWLP: SSP goes on to state that the Plan aims to provide an average of 1.84 million tonnes per annum of sand and gravel for each year of the plan and maintain a landbank sufficient for at least 7 years supply of sand and gravel in line with national policy.

3.3.2 The MWLP: SSP does not identify any proposed extraction from the River Valley / Glacial Sand and Gravel MSA during the plan period.

3.3.3 The land uses proposed within the area of East Park Sites A and B covered by the River Valley / Glacial Sand and Gravel MSA are Solar PV as well as some landscaping features, access track and inverters / transformers.

3.4 Brickclay MSA (Cambridgeshire County)

3.4.1 The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 states at paragraphs 3.26 and 3.27 that:

> *"The spatial strategy for brickclay extraction is to continue extraction at existing consented sites, broadly in an area to the south and east of Peterborough. Future extraction will take place at Kings Delph, Whittlesey, a site allocated on the Policies Map. Localised specialist brickclay is also allocated at Burwell Brickpits.*
>
> *National planning policy requires that a landbank of brickclay is maintained, in the order of 25 years of supply. The extensive reserves of brickclay in the plan area, close to the Whittlesey brickworks complex, should meet this requirement. To ensure the continuity of supply, land located in the Cambridgeshire side of the Kings Delph area, which straddles the administrative boundaries of the two authorities, is allocated for future extraction, delivering an estimated 27 million tonnes of brickclay, which is over 60 years supply, in addition to existing permitted reserves on the Peterborough side."*

3.4.2 There are currently no plans to seek brickclay extraction from within the Order Limits during the plan period.

3.4.3 Cable Corridor (Site B to Site C) lies within the bricklay MSA. The northern extent of East Park Site C also lies within this MSA, however no built development is proposed in this location.

Sand and Gravel MSA (Cambridgeshire County)

3.4.4 The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 identifies at paragraph 3.17 that:

> *"Sand and gravel is the most significant resource in the plan area. The NPPG requires Mineral Planning Authorities (MPAs) to maintain a*

stock of sand and gravel reserves (a landbank) equivalent to at least 7 years supply. The LAA [Local Aggregates Assessment] *(December 2018) records that Cambridgeshire and Peterborough, at the end of 2017, had permitted reserves of 41.43 million tonnes.*

The 10 year average of sand and gravel sales is 2.36 million tonnes per annum (Mtpa). Annual sales have however increased in recent years, with the 3 year average being 2.89Mtpa. Part of this increase is attributed to construction of the A14 improvement scheme, however the general trend upwards needs to be recognised and reflected in the annual provision rate.

Taking account of these two metrics … the Councils have determined that an appropriate annual provision rate for the Plan is 2.6Mtpa. This represents the mid-point between the 10 year sales average and the 3 year sales average, and is also a 10% increase on the 10 year sales average (10% often being used as a proxy for a buffer above the 10 year sales average in other Minerals and Waste Local Plans). At 2.6Mtpa, this would equate to a landbank of 15.9 years.

An annual provision rate over the plan period (2016 to 2036) of 2.6Mt would give rise to a total requirement for 54.6Mt of sand and gravel. Taking off sales in 2016 and 2017 (2.56Mt and 3.56Mt respectively), this leaves a remaining plan period requirement of 48.48Mt. At the end of 2017, the plan area had permitted reserves of 41.43Mt. Subtracting permitted reserves of 41.43Mt from the remaining requirement (48.48Mt) leaves a potential shortfall of 7.05Mt to be addressed.

Moving forward, the spatial strategy of this Local Plan is for extraction of sand and gravel to take place in a broad corridor north to south through the centre of the plan area. Such extraction will take place from sites allocated for that purpose on the Policies Map."

3.4.5 There are currently no plans to seek sand and gravel extraction from within the Order Limits during the plan period.

3.4.6 The sand and gravel MSA lies within the northern extent of East Park Site C. The land uses proposed within the area of East Park Site C covered by the sand and gravel MSA are Solar PV, as well as some landscaping features, access track and inverters / transformers.

3.5 Impact on Safeguarding Resource

3.5.1 As outline above, the Order Limits are located in part within several MSAs. Paragraph 223 of the NPPF, as well as Policies MSP 11 and 12 of the MWLP: SSP and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan seek to protect mineral resources in MSA's from permanent sterilisation.

3.5.2 The section below sets out how the Scheme will not sterilise mineral resources and as such, meets the criteria of Policies MSP 11 and 12, as well as Policy 5.

3.6 Sterilising of Minerals Resource

3.6.1 This section outlines how the Scheme would not result in the sterilisation of mineral resources designated under any MSA.

3.6.2 The Scheme would be operational for 40 years. Following this period, it would be decommissioned and restored to its current condition. This would involve the removal of all Solar PV modules and ancillary infrastructure, all of which are easily demountable. All concrete, hardstanding areas, foundations for the infrastructure and any internal tracks would be removed to a depth of up to 1m. All the below ground cables would be left in situ.

3.6.3 This decommissioning would include removing any permissive paths and the land would be returned to the landowner. Landscape structural planting, including tree planting, hedgerows, scrub, etc., created to deliver biodiversity

mitigation and enhancement associated with the Scheme would be left in situ when the Site is handed back to landowners.

3.6.4 The most sterilising components of the Scheme would be the East Park BESS, East Park Substation, operations and maintenance area, and the retention basin for the BESS / substation. These components would not be sited in a MSA.

3.6.5 Landowners have the right to use their land as they would now, and any minerals would be available to extract if required at a future date.

3.6.6 Any impacts caused by the Scheme related to land use are considered reversible and would be managed through a Decommissioning Environmental Management Plan.

3.6.7 The Scheme is temporary in nature, fully reservable and would not permanently sterilise any mineral resources on Site or hinder future extraction. As such, the Scheme is in accordance with the relevant criteria set out within with Policies MSP 11 and 12 of the MWLP: SSP and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

3.7 Need for Development and Site Selection

3.7.1 The **Planning Statement [EN010141/DR/5.3]** accompanying the DCO Application sets out in detail the urgent and substantial need for the Scheme, concluding that it is essential for closing critical gaps in renewable energy capacity, for meeting statutory climate obligations, for strengthening British energy security, and for catalysing significant economic and environmental benefits at local, regional, and national scales.

3.7.2 **ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1]** provides an overview of the site selection process undertaken to identify the development site and presents the reasons why the Scheme and Order Limits are in this particular location. It sets out an overview of the principles, as well as technical and environmental requirements of a

large scale solar development project that have guided site selection. This includes the availability of a suitable grid connection with sufficient capacity, suitable topography of land and a generally sparse settlement pattern to ensure that the site is of a sufficient scale to deliver meaningful contributions towards meeting net-zero.

3.8 Summary of the Impact on Safeguarded Resource

3.8.1 As outlined above, the Scheme would be decommissioned after 40 years and any impacts caused by the Scheme related to land use are considered reversible and temporary. The minerals within the Order Limits would not be permanently sterilised, and post decommissioning, the land could be worked for minerals if required. Thus, the Scheme meets the requirements of Policies MSP 11 and 12 of the MWLP: SSP and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

3.8.2 Furthermore, the DCO Application demonstrates an overwhelming need for this Scheme and identifies that it could not reasonably be sited elsewhere in line with paragraph 5.11.19 of NPS EN-1.

3.8.3 In light of the above, it is considered that the Scheme is in accordance with the NPS, NPPF and the relevant local minerals policy.