



EAST PARK ENERGY

East Park Energy

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Volume 2 – Technical Appendices

Appendix 4-3 EIA Scoping Opinion Response Matrix

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Appendix 4-3: EIA Scoping Opinion Response Matrix

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1.0 EIA SCOPING OPINION RESPONSE MATRIX

1.1 Introduction

- 1.1.1 This document sets out where in the Environmental Statement (ES) or wider application for development consent the Applicant has addressed the matters raised by the Planning Inspectorate in Sections 2 and 3 of **ES Vol 2 Appendix 4-2: EIA Scoping Opinion [EN010141/DR/6.2]**.

1.2 Scoping Opinion Response Matrix

Table 1: EIA Scoping Opinion Response Matrix

Planning Inspectorate Comment ID	Planning Inspectorate's Comments	Where the Applicant has addressed this in the Environmental Statement
Description of the Proposed Development		
2.1.1	<p>Site boundary</p> <p>The Scoping Report states that the site boundary may be likely to change as the design of the Proposed Development progresses. The ES should describe any alterations to the final boundary for the Development Consent Order (DCO), including an explanation of the reasons for the changes. The Applicant should ensure that the scope of assessments within the ES reflects the maximum extent of the Proposed Development.</p>	<p>The final Order Limits are as shown on ES Vol 1 Figure 1-1: Site Location [EN010141/DR/6.3]. The changes to the Order Limits since EIA scoping are explained in Section 3.5 of ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1], and illustrated on ES Vol 3 Figures 3-1 to 3-3 [EN010141/DR/6.3].</p> <p>The scope of the ES reflects the maximum extent of the Scheme, as described in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1].</p>
2.1.2	<p>Existing utilities infrastructure</p> <p>The Scoping Report identifies a number of existing utilities within the site, including high pressure gas mains and overhead electricity lines. The assessment in the ES should take into account the location of existing infrastructure and identify any interactions between it and the Proposed Development. Any significant effects that are likely to occur should be assessed.</p>	<p>Existing utilities within the Site are described within ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and shown on ES Vol 3 Figure 2-3: Indicative Crossing Plans [EN010141/DR/6.3].</p> <p>The location of crossings are described across ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] in relation to the components of the Scheme that would interact. The potential impacts on existing utilities have been assessed, including in Section 12.8 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] and in Section 16.4 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1].</p>
2.1.3	<p>Design flexibility</p> <p>The Inspectorate notes the Applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the</p>	<p>A description of the Scheme is provided in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1], which also sets out the basis of</p>

	<p>design of the Proposed Development. Paragraph 3.2.7 states that the flexibility of the design will namely relate to the photovoltaic (PV) panel type and configuration, the arrangement of the Battery Energy Storage Systems (BESS), East Park Substation and supporting infrastructure, and the alignment and siting of cabling, including the grid connection.</p> <p>The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.</p>	<p>assessment for the different design parameters to ensure a reasonable worst case assessment.</p> <p>ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] is supported by a series of figures within ES Volume 3 [EN010141/DR/6.3] that illustrate the Scheme.</p>
2.1.4	<p>Construction compounds</p> <p>The Scoping Report states that the Proposed Development would require one or more temporary construction compound(s) within the site, however, the exact location is yet to be determined. To ensure a robust assessment of likely significant effects (LSE), the ES should provide details regarding the number, location and dimensions of construction compounds.</p>	<p>The location of the temporary construction and decommissioning compounds are shown on ES Vol 3 Figure 2-5: Indicative Construction Access and Compounds, and secured by the limits of deviation of Work No. 7 as shown on the Works Plan [EN010141/DR/2.3].</p>
2.1.5	<p>Storage building</p> <p>The ES should provide details relating to the storage building including location and dimensions of the building and any related storage areas. Any potential adverse impacts of the construction,</p>	<p>The storage, operations and maintenance area is shown on ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan and secured by the limits of deviation of Work No. 6A as shown on the Works Plan [EN010141/DR/2.3].</p>

	operation and decommissioning of the storage building should also be assessed in the ES where significant effects are likely to occur.	<p>The design parameters for the storage building are set out in Table 2-29 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1], and an indicative drawing of the building is shown on ES Vol 3 Figure 2-2u [EN010141/DR/6.3].</p> <p>The ES has assessed the impacts of the storage building including within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>
2.1.6	<p>Construction phasing</p> <p>Construction is anticipated to commence in 2026 and last 24 months. Paragraph 3.4.3 of the Scoping Report sets out the expected construction activities but does not include the anticipated phasing of construction works. The ES should include details of how the construction would be phased, including the likely commencement date. Where uncertainty remains, the assessment should be based on a worst-case scenario.</p>	<p>The construction phase is now expected to commence in 2028. The anticipated construction phasing is described in Section 2.5 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and in ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2].</p>
2.1.7	<p>Construction activities</p> <p>An overview of indicative construction activities is provided in paragraph 3.4.3 of the Scoping Report. This information should be set out in the ES including key construction milestones, the duration and location of the required construction activities, associated plant and machinery, and the proposed construction hours.</p>	<p>A description of the construction phase for the Scheme is set out in Section 2.5 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1], and supported by ES Vol 2 Appendix 2-1: Indicative Construction Phasing and Resource Schedule [EN010141/DR/6.2].</p>
2.1.8	<p>Watercourse and road crossings</p> <p>Drainage ditches are likely to be crossed during construction of the Proposed Development. The ES should identify which watercourses and/ or other features, such as roads, will be crossed and at what locations, with reference to an accompanying figure(s). The ES should describe the types of crossings that are required, their scale and dimensions and the nature of any associated construction works. Where this has not been determined, the ES should base assessments on the worst case scenario and justify why this scenario would lead to the greatest environmental impact.</p>	<p>Watercourse, road and utilities crossings within the Site are described within ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and shown on ES Vol 3 Figure 2-3: Indicative Crossing Plans [EN010141/DR/6.3].</p> <p>The location of crossings are described across ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] in relation to the components of the Scheme that would interact.</p>

	Sufficient details should be provided to inform a robust assessment of LSE on relevant aspects/ matters, including watercourse hydraulics and ecological receptors. Efforts should be made to agree the approach to watercourse and road crossings with the relevant consultation bodies.	Drainage ditches and watercourses are further considered in ES Vol 2 Appendix 8-3: Watercourse Crossing Assessment [EN010141/DR/6.2] .
2.1.9	<p><i>Operational and maintenance activities</i></p> <p>The ES should describe the potential scope and duration of maintenance works that would be required during the operation of the Proposed Development, including predicted vehicle movements and staffing numbers. The proposals for ongoing management and maintenance of the land around and under the solar PV modules should be confirmed in the ES, including any vegetation management and animal grazing. Any potential adverse impacts of maintenance activities should also be assessed in the ES where significant effects are likely to occur. Proposals for maintaining vegetation around easements and the Public Rights of Way (PRoW) within the application site should also be described.</p>	<p>ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] and ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] set out the anticipated vehicle movements across the construction and operational phases of the Scheme.</p> <p>The Applicant has set out in Section 2.6 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] the assumptions on replacements of equipment over the lifetime of the Scheme, and this has been considered as part of the assessments across the ES [EN010141/DR/6.1].</p> <p>The outline Operational Environmental Management Plan [EN010141/DR/7.5] provides mitigation measures that will be adopted for replacements across the operational phase of the Scheme.</p> <p>The Applicant has prepared an outline Landscape and Ecological Management Plan [EN010141/DR/7.7] which sets out how existing and proposed habitats across the Site would be managed and maintained, as well as the management of public rights of way.</p> <p>The Applicant has prepared an outline Public Rights of Way Management Plan [EN010141/DR/7.8] that sets out how public rights of way would be managed through the construction phase of the Scheme.</p>
2.1.10	<p><i>Decommissioning</i></p> <p>The Inspectorate notes that decommissioning of the Proposed Development is expected to take between 12 and 24 months. The ES should provide a description of the activities and works which are likely to be required during decommissioning of the Proposed Development, including the anticipated duration. Where significant</p>	<p>The Applicant has set out the approach and assumptions for decommissioning in Section 2.7 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]. This approach has been assessed in the relevant topic assessments in the ES.</p> <p>At decommissioning, the Scheme will be removed as set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and the land</p>

	effects are likely to occur as a result of decommissioning the Proposed Development, these should be described and assessed in the ES. Any proposals for restoration of the site to full agricultural use should also be described.	will be handed back to the landowners, with the Applicant's leases ending. The outline Soil Management Plan [EN010141/DR/7.9] ensures that the soils would be in a suitable condition for farming in the future should the landowners wish.
2.1.11	<i>Decommissioning Environmental Management Plan (DEMP)</i> The Scoping Report refers to the DEMP, Demolition Environmental Management Plan and the Decommissioning Management Plan. The ES should ensure the correct names and acronyms are consistently used when referring to relevant documents.	The Applicant has prepared an outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6] as part of the application for development consent. This acronym has now been set out consistently. The relevant management plans submitted as part of the application are described in the Guide to the Application [EN010141/DR/1.3] .
2.1.12	<i>Lighting</i> The ES should describe the lighting requirements for all elements and phases of the Proposed Development. It should be explained what measures are proposed to minimise light spill on human and ecological receptors.	A description of the lighting requirements is provided in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] . During the construction phase, lighting towers would be required during the winter months at each of the construction compounds. There may also be a requirement for mobile task lighting at some of the construction locations e.g. solar transformer units, BESS compound and East Park Substation compound. Lighting would generally not be operated for longer than one hour either side of the specified construction working hours. Lighting would utilise directional fittings to minimise outward light spill and glare. Measures to control light pollution are documented within the outline Construction Environmental Management Plan [EN010141/DR/7.3] . During the operational phase, lighting would be provided at the BESS / substation / storage area for security purposes and for maintenance undertaken in periods of low light. The lighting would not be switched on routinely and would be operated using infrared motion detectors or switched on manually for maintenance purposes. Lighting would be managed in accordance with the outline Operational Environmental Management Plan [EN010141/DR/7.5] . CCTV cameras placed around the solar arrays would utilise infrared at night, and would not include lighting. The ES provides an assessment of impacts from lighting on human and ecological receptors, including within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] in relation to landscape character and the night

		sky, and within ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] in relation to species and designated sites.
EIA Methodology and Scope of Assessment		
2.2.1	<p>Decommissioning assessment</p> <p>Paragraph 3.5.1 of the Scoping Report identifies a 40-year operational lifespan for the Proposed Development and paragraph 3.6.3 states that the effects of decommissioning are often of a similar, or lower, magnitude than the construction effects. Paragraph 3.6.3 further states that it is not proposed to provide a separate decommissioning assessment for each aspect chapter unless there are specific issues related to decommissioning which could give rise to materially greater impacts than construction. The ES should clearly set out if and how decommissioning is to be assessed and any components which may remain following decommissioning. Paragraph 3.6.1 states that a DEMP will be agreed with the Local Planning Authority. The Inspectorate would expect to see this secured through the inclusion of an outline DEMP (oDEMP) or similar with the Application.</p>	<p>The Applicant has set out the approach and assumptions for decommissioning in Section 2.7 of ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]. This approach has been assessed in the relevant topic assessments in the ES.</p> <p>The Applicant has prepared an outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6] as part of the application for development consent, and this was consulted on as part of the Preliminary Environmental Information Report (PEIR) at the statutory consultation.</p>
2.2.2	<p>Professional judgement</p> <p>The ES should clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.</p>	<p>Each assessment within the ES sets out the methodology that has been followed in making the assessment, and the extent to which professional judgement is relied upon to determine the level of significance of effects.</p>
2.2.3	<p>Ecological mitigation and enhancement</p> <p>The Scoping Report explains that an Ecological Impact Assessment (EclA) and a Biodiversity Net Gain (BNG) assessment will be submitted with the DCO application. These documents should clearly differentiate between measures proposed to mitigate significant effects of the Proposed Development and measures proposed to support BNG.</p>	<p>ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] sets out at Section 7.7 the embedded mitigation measures considered in the assessment of ecological impacts and effects.</p> <p>Biodiversity Net Gain (BNG) is assessed separate from the ES within the BNG Report [EN010141/DR/7.17] as it is considered to be a planning matter, rather than an EIA matter.</p>

2.2.4	<p>Cumulative effects</p> <p>The Zone of Influence (ZOI) used to identify 'other development' to be included in the assessment of cumulative effects should be determined based on the potential for significant effects on receptors to occur and may differ across the environmental aspects. The ES should provide a clear justification for the extent of each ZOI and how it captures the effects from the Proposed Development. It is recommended that the cumulative assessment follows the methodology set out in the Inspectorate's Advice Note Seventeen.</p> <p>Wherever possible it should be agreed with the relevant statutory consultation bodies as part of discussions on the assessment methodologies. Evidence of agreement on these points should be provided in the ES.</p>	<p>The Zols used to identify 'other development' are set out in Table 4.2 of ES Vol 1 Chapter 4: EIA Methodology [EN010141/DR/6.1].</p> <p>The Applicant consulted with the host authorities on the approach to assessing cumulative effects and agreed the cumulative schemes to be considered as part of this assessment prior to the statutory consultation. Comments received on the scope of cumulative development are set out in host authority responses within the Consultation Report [EN010141/DR/5.1]. The cumulative schemes for assessment have been updated and are set out in ES Vol 2 Appendix 4-5: Short List of 'Other Development' [EN010141/DR/6.2].</p>
2.2.5	<p>Monitoring</p> <p>The ES should identify and describe any proposed monitoring of adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.</p>	<p>Specific monitoring requirements are set out in section 9 of each topic assessment chapter, and described in detail within the various environmental management plans submitted as part of the application for development consent.</p>
2.2.6	<p>Scoping table</p> <p>The Inspectorate recommends the use of a table in the ES to set out key changes in parameters/ options of the Proposed Development presented in the Scoping Report to those presented in the ES. It is also recommended that a table demonstrating how the matters raised in the Scoping Opinion have been addressed in the ES and/ or associated documents is provided.</p>	<p>This document sets out how the Applicant has responded to the matters raised by the Planning Inspectorate in Sections 2 and 3 of ES Vol 2 Appendix 4-2: EIA Scoping Opinion [EN010141/DR/6.2].</p> <p>ES Vol 1 Chapter 3: Alternatives and Design Evolution [EN010141/DR/6.1] and ES Vol 3 Figures 3-1 to 3-3 [EN010141/DR/6.3] describe the changes made to the Scheme since EIA scoping.</p>
2.2.7	<p>Transboundary</p> <p>The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching</p>	<p>The Applicant notes this comment.</p>

	<p>this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at</p> <p>http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/</p>	
Landscape and Visual		
3.1.1	<p>Regional Character Types</p> <p>The Applicant proposes to scope out an assessment of effects on the Regional Character Types on the basis that an assessment at the national, district, and local scales would be undertaken, and the regional and district landscape types have similar characteristics. It is also noted that the Regional Character Types of the East of England would be summarised within the baseline conditions.</p> <p>The Inspectorate is content that this matter can be scoped out of further assessment based on the above justification</p>	<p>The Applicant notes this comment.</p> <p>No further response required.</p>
3.1.2	<p>Effects on designated landscapes</p> <p>The Applicant proposes to scope out effects on designated landscapes based on the distance between the site and any</p>	<p>The Applicant notes this comment.</p> <p>No further response required.</p>

	<p>statutory or non-statutory designated landscapes. Paragraph 7.4.36 states that the closest statutory landscape designation is approximately 30km to the south. Paragraph 7.4.37 states that there are no non-statutory landscape designations within the study area and that “neither Bedford Borough Council nor Huntingdonshire District Council maintain a local landscape designation as part of their local development plans”.</p> <p>Considering the distance of the Proposed Development from any statutory and non-statutory designated landscapes, the Inspectorate is content that this matter can be scoped out of further assessment.</p>	
3.1.3	<p><i>Standalone glint and glare assessment</i></p> <p>It is noted that a standalone glint and glare assessment is proposed which would form a technical appendix to the landscape and visual chapter, rather than a standalone chapter, with significant effects and any mitigation measures proposed reported within the ES.</p> <p>The Inspectorate is content with this approach subject to cross-references being made where appropriate.</p>	<p>The Applicant notes this comment.</p> <p>ES Vol 2 Appendix 5-6: Glint and Glare Assessment [EN010141/DR/6.2] presents an assessment of glint and glare, and this has been referenced within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>
3.1.4	<p><i>Residential Visual Amenity Assessment (RVAA)</i></p> <p>The Scoping Report notes (at paragraph 7.5.23) that an RVAA is proposed to be scoped into the ES at this stage on the basis that the layout of the Proposed Development and proposed mitigation is not yet fixed, although paragraph 7.5.24 states that an RVAA may be subsequently scoped out following consultation with stakeholders, and an evidence-based appraisal will be provided to justify this. The Inspectorate welcomes this approach but notes inconsistency between this approach and Table 7.4. This table states that an RVAA is proposed to be scoped out for the construction and decommissioning phases.</p> <p>It is noted that paragraph 7.5.18 of the Scoping Report refers to the Landscape Institute’s Technical Guidance Note TGN 2/19: ‘Residential Visual Amenity Assessment’. The Inspectorate understands that in this guidance the requirement for an RVAA is</p>	<p>ES Vol 2 Appendix 5-7: Residential Visual Amenity Assessment [EN010141/DR/6.2] comprises a residential visual amenity assessment for the Scheme. The RVAA focuses on residential properties where a significant effect has been reported within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1]. The Applicant notes the comment with regards construction and decommissioning effects and has considered these stages of the Scheme within the RVAA where appropriate.</p> <p>The Scheme has been designed to provide suitable offsets and/or visual screening from the properties located in close proximity to the Site. There are no residential receptors where the threshold of acceptability for residential visual amenity as outlined in the Landscape Institute’s TGN 02/2019 would be exceeded.</p>

	<p>generally dependent on the outcome of a Landscape and Visual Impact Assessment (LVIA). In the absence of an LVIA for the construction and decommissioning phases, the Inspectorate does not have sufficient evidence to agree to scope this matter out of further assessment. Construction and decommissioning effects should therefore be assessed within any subsequent RVAA, or justification should be provided why significant effects would not occur, supported by evidence of agreement with the relevant consultation bodies.</p>	
3.1.5	<p><i>Night-time effects – operation</i></p> <p>The Applicant proposes to scope out an assessment of night-time landscape and visual effects during operation on the basis that the Proposed Development would only be lit during periods of infrequent maintenance outside of daylight hours or in the event of an emergency.</p> <p>The Inspectorate is content that, on the basis that the Proposed Development would not be continually lit during operation, this matter can be scoped out of further assessment for the operational phase. Nevertheless, the ES should clarify the likely frequency of maintenance activities occurring outside of daylight hours and provide details of the proposed operational lighting strategy, such as measures to prevent impacts from lighting during emergency or maintenance events.</p>	<p>The Applicants notes the comment with regards scoping out further assessment of night-time effects during the operational phase.</p> <p>Further information regarding lighting design for the operational stage is included within ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and covered within the outline Operational Environmental Management Plan [EN010141/DR/7.5]. These documents confirm that maintenance activities would not generally be undertaken at night, except for in an emergency event.</p> <p>The Applicant has assessed the impacts and effects to the character of the night sky as a result of the Scheme within Section 5.8 of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p>
3.1.6	<p><i>Night-time effects – construction and decommissioning</i></p> <p>Table 7.4 states that night-time effects during the construction and decommissioning phases are proposed to be scoped out. It is noted that some lighting would be required during construction and decommissioning but this would be managed in accordance with best practice measures set out within the outline Construction Environmental Management Plan (OCEMP).</p> <p>No further detail is provided on the proposed lighting strategy during construction/ decommissioning. Given that lighting would be required, the Inspectorate does not agree that this matter can be</p>	<p>Further information regarding lighting design for the construction and decommissioning phases is included within ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] and covered within the outline Construction Environmental Management Plan [EN010141/DR/7.3] and outline Decommissioning Environmental Management Plan [EN010141/DR/7.6].</p> <p>A summary of the night-time baseline situation is provided in Section 5.6 of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] and an assessment of night-time effects of construction lighting is provided in Section 5.8.</p>

	<p>scoped out at this stage. Accordingly, the ES should provide an assessment of these matters, or the information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	
3.1.7	<p>Study area</p> <p>The Scoping Report states that a 3km study area has been used for the LVIA. Paragraph 7.2.6 states that landscape and visual effects beyond this distance are not likely to be significant based on the assessor's professional judgement when considering the characteristics of the site and the receiving landscape.</p> <p>The Inspectorate is broadly content with the 3km study area proposed based on the Zone of Theoretical Visibility (ZTV) shown on Figures 7-5 to 7-7. However, these ZTV are based on the 3m maximum height of PV panels. As described within Section 3.3 of the Scoping Report, the Proposed Development involves additional infrastructure exceeding 3m in height, such as elements of the substation up to 12m in height, switchgear up to 8m in height, and battery storage facility up to 4.5m in height. Although it is noted that fieldwork was undertaken in June 2022 to establish the maximum extent of visibility of the site, the detail of this fieldwork is not provided, and it is unclear whether this is based on the maximum height of components or the 3m high PV panels.</p> <p>The ES should clearly justify the study area(s) used and should ensure that a worst-case scenario is assessed. Where there are elements of the Proposed Development which exceed 3m, the Applicant should consider using multiple ZTVs to assess the potential visibility for all components of the Proposed Development.</p> <p>The Applicant should make effort to agree the study area for LVIA with relevant consultees and provide evidence of this within the ES.</p>	<p>The Applicant notes that the Inspectorate is broadly content with the 3km study area.</p> <p>With respect to comments on ZTVs, additional ZTVs have been produced illustrating the solar array (ES Vol 3 Figures 5-3a and 5-3b [EN010141/DR/6.3]) and substation and BESS site (ES Vol 3 Figure 5-3d [EN010141/DR/6.3]). These ZTVs are based on the maximum height parameters of the Scheme and therefore represent a reasonable worst case scenario.</p>
3.1.8	<p>Local Landscape Character Areas (LLCAs)</p>	<p>The Applicant notes the comments made by the Inspectorate and has since amended the approach taken to the landscape character assessment to ensure that landscape character within the entire study area is addressed, as set out in ES Vol 2 Appendix 5-3:</p>

	<p>The Scoping Report states that LLCAs will be defined for the site and its immediate context but not for the full extent of the LVIA study area.</p> <p>It is not clear on what basis this has been established. The Inspectorate is of the opinion that the study area should reflect the extent of likely significant landscape effects. The study area represents the extent to which effects could occur and therefore all the LLCAs within the study area should be defined.</p>	<p>Effects on Landscape Character [EN010141/DR/6.2]. The applicant has taken the local landscape character assessments published by the host authorities as the focus of the landscape character assessment. LVIA site surveys have established that the scale and detail of the assessments, which were relatively recently produced, is appropriate as the basis of the character assessment. The landscape character assessment has been carried out for the entire 3km study area.</p>
3.1.9	<p>Viewpoints</p> <p>There is discrepancy within the Scoping Report about the number of viewpoints selected. Paragraph 7.4.64 states that a provisional list of 79 viewpoints has been selected, however, Table 7.3 and Figure 7-7 identify 82 viewpoints.</p> <p>Although the Inspectorate recognises that these are still subject to finalisation in consultation with relevant consultees, the ES should be consistent with the number of viewpoints selected. Evidence of the consultation with relevant bodies regarding the viewpoints selected should be provided within the ES.</p>	<p>The Applicant notes the discrepancy and can confirm that 82 viewpoints were provisionally identified within the Scoping Report. The Applicant has subsequently included an additional viewpoint (viewpoint 83) from adjacent to the River Kym in East Park Site C, at the request of Historic England. The final number of viewpoints assessed within ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] is therefore 83.</p> <p>The Applicant consulted on the viewpoints as part of the PEIR at statutory consultation and the LPAs had no comment to make with regards the landscape and visual assessment, noting however that they did not have the appropriate expertise to provide detailed review of the approach.</p>
3.1.10	<p>Mitigation</p> <p>The Scoping Report states that changes to the layout of the proposed solar panels and ancillary structures would occur in order to mitigate landscape and visual effects. It is unclear whether these changes would occur prior to the completion of the ES or whether this would occur post-consent. Where flexibility is sought, the ES should clearly set out the maximum design parameters that have been assessed and how these have been used to inform an adequate assessment in the ES.</p>	<p>Refer to ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1] for the Scheme description and the maximum design parameters which have been assessed in ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] to ensure a reasonable worst case assessment. Additional parameters which are specific to landscape and visual assessment such as, for example, the assumed heights of mitigation planting within the Year 10 assessment of landscape and visual effects, are set out in Section 5.4 of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1].</p> <p>The final detailed design of the Scheme must accord with the documents listed in Requirement 6 of the draft DCO [EN010141/DR/3.1]. In addition, the final detailed design of the</p>

		landscape proposals must be in substantial accordance with the Illustrative Landscape Proposals at Appendix A of the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] .
3.1.11	<p>Assessment scenarios</p> <p>The Scoping Report states that landscape and visual effects will be assessed during summer of Year 10 of operation. It is unclear how a scenario within the summer would represent a worst-case scenario in terms of landscape and visual effects given the potential screening effect from deciduous vegetation in leaf. It is also stated in paragraph 7.7.1 that summer and winter photography will be used “as far as practicable”. The reasoning behind this statement is unclear considering paragraph 7.7.2 states that all photography will be from publicly accessible locations.</p> <p>The Applicant should provide photographs during winter as well as in summer to allow an assessment of the maximum visibility scenario and illustrate the seasonal differences in screening provided by mitigation planting in line with the Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute and Institute of Environmental Assessment, 3rd Edition, 2013).</p>	<p>The Applicant notes these comments and as is set out in Section 5.4 of ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1], has taken an approach regarding the assessment of seasonal effects which focuses on the worst-case scenario at each stage of the visual assessment, including construction, operation (Year 0 and Year 10) and decommissioning.</p> <p>This does not apply to the landscape assessment which is not typically considered seasonally.</p> <p>With regards winter photography, the applicant can clarify that “as far as practicable” was intended to refer to the Scheme timeframe and the time available during that programme to take winter photographs. However, since the Scoping Opinion was issued the applicant has carried out winter photography, in January and February 2024. In addition, summer photography (i.e. when deciduous trees were in leaf) was undertaken in September and early October 2024. The viewpoint photographs are presented across ES Vol 3 Figure 5-5 to 5-87 [EN010141/DR/6.3].</p>
Ecology and Nature Conservation		
3.2.1	<p>International statutory designated sites for nature conservation</p> <p>The Applicant proposes to scope out construction, operational and decommissioning effects of the Proposed Development on international statutory designated sites. The Scoping Report states that there are no international statutory designated sites within 10km of the DCO boundary and embedded avoidance and mitigation measures proposed would not lead to significant effects on the sites or associated qualifying features.</p>	<p>Statutory designated sites (Eversden and Wimpole Woods SAC) have been scoped into the assessment, following consultation with Natural England that is set out in Section 7.3 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. #</p> <p>An assessment is provided in Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>The Applicant has prepared Information to Inform Habitats Regulations Assessment [EN010141/DR/5.7] that confirms the</p>

	<p>In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from further assessment. The ES should provide an assessment of likely significant effects on international statutory designated sites, including the potential for the Proposed Development site to provide functionally linked land for species which are qualifying features of European sites or provide the evidence referred to above, demonstrating an absence of LSE.</p>	<p>Site is not functionally linked land to a European site, and that there would be no LSE.</p>
3.2.2	<p><i>National statutory designated sites for nature conservation</i></p> <p>The Applicant proposes to scope out construction, operational and decommissioning effects of the Proposed Development on national statutory designated sites on the basis that embedded avoidance and mitigation measures proposed would prevent significant effects on the sites or associated qualifying features.</p> <p>Figure 8.1 indicates that there are several national designated sites within the established 5km ZOI. In the absence of information detailing the avoidance and mitigation measures proposed, the Inspectorate considers that the ES should provide an assessment of the potential effects of the Proposed Development on all national designated sites located within 5km of the DCO boundary or provide a justification as to the absence of LSE including evidence of agreement with relevant consultation bodies.</p>	<p>The zone of influence used in the assessment includes all nationally designated sites within 5km of the Scheme.</p> <p>Embedded mitigation measures have been outlined in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] and an assessment of impacts provided in Section 7.8.</p> <p>Consultation has been undertaken with Natural England who have agreed the application presents a low risk to designated sites, as set out in Section 7.3 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>
3.2.3	<p><i>Non-statutory designated sites</i></p> <p>The Applicant proposes to scope out construction, operational and decommissioning effects of the Proposed Development on non-statutory designated sites on the basis that embedded avoidance and mitigation measures proposed would not lead to significant effects on the sites or associated qualifying features.</p> <p>In the absence of information detailing the avoidance and mitigation measures proposed, the ES should provide an assessment of the potential effects of the Proposed Development on all non-statutory designated sites located within 2km of the site or provide evidence</p>	<p>The zone of influence used in the assessment includes all non-statutory designated sites within 2km of the Scheme.</p> <p>Embedded mitigation measures have been outlined in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] and an assessment of impacts provided in Section 7.8.</p>

	to demonstrate the absence of LSE including agreement with relevant consultation bodies.	
3.2.4	<p><i>Ancient woodland and other irreplaceable habitats</i></p> <p>The Scoping Report states that no ancient woodland or other irreplaceable habitats are known to be present on the site, as a result an assessment of potential effects has been scoped out of further assessment. However, the Inspectorate notes that ancient woodland and veteran trees are present within the wider 2km study area and that further arboricultural surveys may be undertaken to identify notable trees that may be impacted in land surrounding the site.</p> <p>The ES should provide an assessment of the potential effects of the Proposed Development on ancient woodland, veteran trees and other irreplaceable habitats located within 2km of the entire site boundary, including the PV area and grid connection route, or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.</p>	<p>The zone of influence used in the assessment includes all ancient and irreplaceable habitats within 2km of the Scheme.</p> <p>Embedded mitigation measures have been outlined in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] and an assessment of impacts provided in Section 7.8.</p> <p>Irreplaceable habitats have been assessed within Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1], and in regards to ancient and veteran trees, within ES Vol 2 Appendix 2-2: Arboricultural Impact Assessment [EN010141/DR/6.2] (which confirms that no trees will be removed as a result of the Scheme).</p>
3.2.5	<p><i>Priority habitats and other on-site habitats - operation and decommissioning</i></p> <p>The Applicant considers that operation and decommissioning of the Proposed Development is unlikely to lead to significant effects on priority and other on-site habitats and proposes to scope this matter out of further assessment. The Inspectorate is content to scope this matter out as an assessment of construction impacts is proposed and will assess the potential long term or permanent effects of habitat loss, severance and disturbance of priority and other on-site habitats through the operation and decommissioning phases of the Proposed Development.</p>	<p>The Applicant notes this comment.</p>
3.2.6	<p><i>Non-breeding birds</i></p> <p>The Applicant proposes to scope out effects on non-breeding birds during all phases of the Proposed Development on the basis that</p>	<p>Further survey for non-breeding birds has been undertaken and is presented in ES Vol 2 Appendix 7-3: Wintering Bird Survey Report [EN010141/DR/6.2]. An assessment of likely impacts and</p>

	<p>there are only low numbers of non-breeding bird species present on the site and that the impacts of operational maintenance would not be greater than existing agricultural activities on site.</p> <p>Paragraph 8.4.33 states that additional non-breeding bird surveys will be undertaken in 2023/ 2024 to update existing survey results and collect data at East Park Site D. In the absence of a comprehensive set of non-breeding bird survey results covering the entirety of the site, the Inspectorate considers that the ES should include an assessment of non-breeding birds or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.</p>	<p>effects is provided in Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>
3.2.7	<p><i>Roosting bats</i></p> <p>The Applicant proposes to scope this matter out of further assessment on the basis that trees located within the site that offer bat roosting potential will be retained and protected in line with embedded avoidance and mitigation measures and no buildings with bat roosting potential are anticipated to be affected by the Proposed Development.</p> <p>Provided relevant mitigation measures are secured through the DCO, the Inspectorate agrees to scope this matter out of further assessment. However, should refinement of the design of the Proposed Development during the pre-application stage result in potential impacts to trees or buildings which offer bat roosting potential, the ES should provide a full assessment of effects on roosting bats during all phases of the Proposed Development.</p>	<p>Embedded mitigation measures to protect trees with bat roost potential are set out in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. This is secured via the outline Construction Environmental Management Plan [EN010141/DR/7.3] and the outline Landscape and Ecological Management Plan [EN010141/DR/7.7].</p>
3.2.8	<p><i>Foraging and commuting bats - decommissioning</i></p> <p>The Inspectorate considers that decommissioning effects are unlikely to give rise to materially greater effects than construction and is content to scope this matter out of further assessment.</p>	<p>The Applicant notes this comment.</p>

3.2.9	<p><i>Amphibians (including great crested newt (GCN)) – operation and decommissioning</i></p> <p>The Scoping Report states that an assessment of effects on amphibians is scoped out for the operation and decommissioning phases on the basis that suitable habitats on the site will be retained and protected through embedded avoidance and mitigation measures. However, the Inspectorate notes that the presence of GCN has been confirmed on the site and further surveys are scheduled for 2024.</p> <p>In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>An assessment of impacts and effects on amphibians is undertaken in Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>
3.2.10	<p><i>Impacts to the following ecological receptors: reptiles; badgers; water vole; otter; and invertebrates</i></p> <p>The Scoping Report states that an assessment of effects on reptiles, badgers, water vole, otter and invertebrates is scoped out of further assessment on the basis that suitable habitats on the site will be retained and protected through embedded avoidance and mitigation measures.</p> <p>In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>The Applicant consulted with Cambridgeshire County Council (acting on behalf of the three host authorities) prior to statutory consultation and agreed that an assessment of impacts and effects on badger could be scoped out of the ES, as set out in Section 7.3 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p> <p>The Applicant has undertaken badger surveys during the pre-application phase and these are reported in ES Vol 2 Appendix 7.4: Badger Survey Report [EN010141/DR/6.2].</p> <p>Embedded mitigation measures to protect and manage impacts to badgers are set out in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>
3.2.11	<p><i>Study area</i></p> <p>The Scoping Report proposes a 10km and 5km study area for international and national designated sites, respectively. The ES</p>	<p>The zone of influence has been increased to 30km for internationally designated sites with bats as a qualifying feature.</p>

	<p>should ensure the study area for each ecological receptor reflects the Proposed Development's ZOI rather than being based on a fixed distance. In relation to internationally designated sites, the ES should consider the potential for effects to occur beyond 10km, particularly where sites are designated for mobile species such as birds and bats. Efforts should be made to agree the study area(s) with relevant consultation bodies.</p>	<p>Eversden and Wimpole Woods SAC has therefore been scoped in to the assessment of impacts and effects in Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>
3.2.12	<p>Further ecological surveys</p> <p>Paragraph 8.4.5 of the Scoping Report states that some ecological surveys are ongoing or set to be completed in 2024. The Inspectorate considers that the possibility of identifying further receptors remains. The ES must report the full survey findings and list all receptors identified as potentially present on site and assess significant effects where they are likely to occur.</p>	<p>All surveys and desk study data used to inform the assessment of impacts and effects are set out in Section 7.6 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]. Survey data and desk study data is presented across ES Vol 2 Appendix 7-1 to 7-7 [EN010141/DR/6.2].</p>
3.2.13	<p>County Wildlife Sites (CWS)</p> <p>Paragraph 8.4.14 states that at least eight CWS were located within the 2km study area, including two directly adjacent to the site boundary. The Scoping Report cites two varying sources of data regarding the number of CWS within the study area, the Applicant should ensure the information used in the ES is accurate and consistent with the number of CWS identified within the proposed study area.</p>	<p>County Wildlife Site data has been provided in ES Volume 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2], and informed the assessment in Section 7.8 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>
3.2.14	<p>Buffer zones</p> <p>The Inspectorate draws the Applicant's attention to the consultation responses from the Environment Agency and the Forestry Commission (see Appendix 2 of this Opinion).</p> <p>Appropriate buffer zone distances between elements of the Proposed Development and sensitive habitat types, including watercourses, hedgerows, ancient woodland and veteran trees, should be defined in the ES, with reference to how this is secured</p>	<p>The Scheme parameters are set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1], with buffers also set out in the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The oLEMP is secured by a Requirement of the draft DCO [EN010141/DR/7.7].</p> <p>A summary of embedded mitigation measures is provided in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1].</p>

	through the DCO. The Applicant should make effort to agree these details with relevant consultation bodies.	
3.2.15	<p><i>Fish and aquatic invertebrates</i></p> <p>Pertenhall Brook flows through site A and the River Kym forms the northern boundary of site C, however, no fish or aquatic invertebrate surveys have been or are noted as being undertaken. Details of the surveys should be provided within the ES, or it should be demonstrated why LSE on fish and aquatic invertebrates are not expected to arise.</p>	Embedded mitigation measures related to fish and aquatic invertebrates are set out in Section 7.7 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] . On the basis of the embedded mitigation measures, an assessment of impacts and effects has been scoped out of the assessment.
3.2.16	<p><i>Invasive Non-Native Species (INNS)</i></p> <p>Impacts from INNS are not identified in the Scoping Report to be assessed in the ES. The ES should assess potential impacts from INNS where significant effects are likely to occur. Where mitigation measures are relied on to avoid significant effects, the ES should describe these measures and signpost how they would be secured through the DCO.</p>	<p>As set out in Section 3.6 of ES Vol 2 Appendix 7-1: Ecological Baseline Report [EN010141/DR/6.2], no invasive non-native species have been identified within the Order Limits during the habitat surveys.</p> <p>Mitigation measures to address invasive species are included in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7] and outlined in Section 7.7.</p>
3.2.17	<p><i>Access and cable routes surveys</i></p> <p>The Scoping Report indicates that breeding bird, wintering bird and bat activity surveys are not required within the access and cable routes. However, in the absence of detailed information regarding construction activities and the proposed construction lighting strategy, the Inspectorate considers that there is potential for effects on breeding and wintering birds and foraging/ commuting bat species within the land required for the access and cable routes during construction.</p> <p>The ES should ensure that ecological assessments are supported by robust baseline data. Detailed breeding bird, wintering bird and bat activity surveys should be conducted for the Proposed Development site, including the access and cable routes, or the ES should provide evidence of agreement from relevant consultation bodies that such surveys are not required.</p>	All surveys and desk study data used to inform the assessment of impacts and effects to breeding bird, wintering birds, and bats are set out in Section 7.6 of ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1] . Survey data and desk study data is presented across ES Vol 2 Appendix 7-1 to 7-7 [EN010141/DR/6.2] .

3.2.18	<p>Confidential annexes</p> <p>Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.</p>	<p>The Applicant notes this comment.</p> <p>ES Vol 2 Appendix 7-4: Badger Survey Report [EN010141/DR/6.2] is marked as confidential and will be provided to the inspectorate and to relevant consultees separately.</p>
Flood Risk, Drainage and Surface Water		
3.3.1	<p>Designated sites</p> <p>The Applicant proposes to scope this matter out of further assessment on the basis that the Proposed Development is not hydrologically linked to any of the designated sites, which are either located upstream of the site or within a different, unconnected sub-catchment. Although a list of the closest designated sites to the site boundary is set out in paragraph 9.4.8 of the Scoping Report, limited evidence is provided to confirm that they are not hydrologically linked to the site and therefore the Inspectorate is not content to scope this matter out at this stage.</p> <p>The ES should provide an assessment of the potential water effects of the Proposed Development on designated sites or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.</p>	<p>Embedded design measures to protect water quality within the Order Limits to be applied on location, where concerns may first arise, as set out in Section 8.7 of ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1].</p> <p>Section 8.8 and Section 8.10 of ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1] assess potential impacts to designated sites.</p>
3.3.2	<p>Water quality from increased siltation and pollution events - operation</p>	<p>Section 8.8 and Section 8.10 of ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1] describe reasons for the conclusion that there will be no operational impact upon water quality. Embedded mitigation measures are principally secured by</p>

	<p>The Scoping Report states that during operation of the Proposed Development the risks of pollution are expected to be minimal and can be managed by the implementation of best practice measures.</p> <p>The Inspectorate considers that the presence of chemicals and soil disturbance during operation, including maintenance procedures, is unlikely to give rise to significant effects. The ES should explain why the operation of the Proposed Development would not give rise to routine emissions of chemicals (ie that panels are effectively inert) or sediment and how emergency releases would be managed within an Operation Environment Management Plan and/ or Soil Management Plan and Battery Safety Management Plan. The Inspectorate is content to scope this matter out of further assessment on this basis.</p>	<p>the outline Surface Water Management Plan [EN010141/DR/7.13] and outline Construction Environmental Management Plan [EN010141/DR/7.3].</p>
3.3.3	<p><i>Decommissioning effects</i></p> <p>The Scoping Report states that effects from decommissioning on water environment receptors, excluding water quality effects from increased siltation and pollution events, are assumed to be no worse than effects during construction. Provided a DEMP is produced and implemented to manage decommissioning activities and relevant measures are agreed with the Local Planning Authorities, the Inspectorate is content to scope this matter out of further assessment.</p>	<p>An outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6] has been prepared as part of the application, and was consulted on as part of the statutory consultation. A final Decommissioning Environmental Management Plan would be prepared in substantial accordance with the oDEMP, as secured by a Requirement of the draft DCO [EN010141/DR/3.1].</p>
3.3.4	<p><i>Construction compounds</i></p> <p>The Applicant should ensure that an assessment of the potential impacts from construction compounds on water environment receptors is included in the ES. The ES should also explain how the location of construction compounds, including the access, has been considered to reduce potential effects on the water environment and how any mitigation has been secured.</p>	<p>The outline Surface Water Management Plan [EN010141/DR/7.13] and outline Construction Environmental Management Plan [EN010141/DR/7.3] describe measures to mitigate impacts on water quality during the construction phase, including from activities accessing and within the construction compound.</p> <p>An assessment of impacts and effects on the water environment is provided in Section 8.8 of ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1].</p>

3.3.5	<p>Flood risk</p> <p>The Inspectorate notes the Applicant's intention to provide a Flood Risk Assessment (FRA) as a standalone report within the technical appendices of the ES. The ES should assess the potential flood risk to and from the Proposed Development and describe suitable mitigation measures and flood resilient construction techniques that will allow the development to remain operational throughout its 40-year lifespan.</p>	<p>ES Vol 2 Appendix 8-1: Flood Risk Assessment</p> <p>[EN010141/DR/6.2] presents the flood risk assessment for the Site which includes in Section 4.3 the integrated mitigation measures to ensure the Scheme is resilient to flood risk. This is also assessed as part of the wider ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1].</p>
3.3.6	<p>Mitigation measures</p> <p>The Inspectorate notes the proposed use of mitigation measures, namely Sustainable Drainage Systems (SuDS). The design of such mitigation measures should be informed by relevant and up to date climate change allowances for the lifetime of the Proposed Development.</p>	<p>Drainage design criteria has been discussed in the outline Surface Water Management Plan [EN010141/DR/7.13] using appropriate climate change allowances according to the expected lifetime of the Scheme.</p>
3.3.7	<p>Assessment methodology</p> <p>The Scoping Report does not provide a detailed description of the methodology to be used in the flood risk, drainage and surface water assessment. The ES should explain how flood risk, drainage and surface water impacts have been identified and the methodology that will be used to determine the significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.</p>	<p>The assessment methodology is described in Section 8.4 of ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1].</p>
3.3.8	<p>Figures</p> <p>The Applicant should ensure that all features on the figures are clearly discernible, avoiding the use of coloured boundaries and features that are too similar or overlapping to be differentiated. This issue is particularly evident when reviewing the Water Framework Directive (WFD) river waterbodies and relevant local authority boundaries on Figure 9-1.</p>	<p>The figures supporting ES Vol 1 Chapter 8: Hydrology and Flood Risk [EN010141/DR/6.1] have been updated accordingly.</p>

3.3.9	<p>Water resources</p> <p>In their consultation response (see Appendix 2 of this Opinion), Anglian Water note that the Proposed Development is located within an area designated as 'seriously water stressed' by the Environment Agency. The ES should provide details relating to the water supply and demand requirements during the construction and operational phases of the Proposed Development (including in the context of managing BESS fire risk).</p>	<p>Water demand requirements are set out in the outline Construction Environmental Management Plan [EN010141/DR/7.3]. Supply requirements for BESS fire water is given in ES Vol 2 Chapter 2: The Scheme [EN010141/DR/6.1].</p>
3.3.10	<p>Flood Zone 3</p> <p>Where relevant, the ES and FRA should differentiate between Flood Zones 3a and 3b in order to determine which parts of the site are located in areas considered as 'high probability of flooding' and 'functional floodplain'. The ES should include a figure to illustrate the extent of Flood Zones 3a and 3b.</p>	<p>Development is sited outside of Flood Zone 3 so no differentiation between Flood Zones 3a and 3b is required, as shown on Figures 4a to 4c of ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2].</p>
Ground Conditions		
3.4.1	<p>Human health (exposure to contamination, ground gases and vapours) – operation and decommissioning</p> <p>The Inspectorate has considered the characteristics of the Proposed Development and is content that the operational phase is unlikely to result in significant human health effects from exposure to contaminants. As such, an assessment of the operational phase can be scoped out of further assessment. However, it is unclear whether the potential for exposure during the decommissioning phase remains and therefore the Inspectorate is not content to scope this matter out at this stage.</p> <p>The ES should include an assessment of the likely significant effects on human health resulting from exposure to contaminants during construction and decommissioning or provide evidence to demonstrate the absence of LSE including evidence of agreement with relevant consultation bodies.</p>	<p>An assessment of the construction and decommissioning phases has been included in Section 12.8 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p>

3.4.2	<p><i>Human health (Unexploded Ordnance (UXO))</i></p> <p>The Applicant proposes to scope this matter out on the basis that UXO risk to the site is low. Paragraph 10.4.17 of the Scoping Report explains that the site is located 1.5km away from Melchborne Woods Ministry of Defence (MOD) bulk storage and filling depot which was formerly used to store ordnance. Whilst the Inspectorate acknowledges that the site is some distance from the Melchborne Woods site, it is unclear whether UXO surveys have been undertaken to determine the potential for undetected UXO to be present on-site, particularly as the proximity to the MOD depot means there is potential for a higher UXO risk if the site was a target of ordnance.</p> <p>On the basis of the information provided, the Inspectorate does not agree to scope this matter out at this stage. The ES should assess the potential for LSE to occur from UXO or demonstrate the absence of LSE eg through the provision of surveys or agreement with relevant consultation bodies.</p>	<p>A detailed UXO desk-based study has been undertaken and is provided in Appendix E of ES Vol 2 Appendix 12-1 Phase 1 Geo-Environmental Assessment EN010141/DR/6.2] and proposed mitigation is provided in Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p> <p>There is a commitment to produce a UXO Management Plan prior to construction. This is secured by the outline Construction Environmental Management Plan [EN010141/DR/7.4].</p>
3.4.3	<p><i>Controlled waters – operation</i></p> <p>The Inspectorate has considered the characteristics of the Proposed Development and is content to scope an assessment of this matter out for the operational phase on the assumption that the assessment of construction effects would inform the design proposal. However, paragraph 9.5.19 states that there is a small risk of pollution from chemical spills from on-site maintenance or faults in the PV modules. As such, the ES should clarify the potential sources of pollution during the maintenance phase and outline any measures in place to limit the potential for chemical spillage/leakage, including from BESS, as well as the mechanism by which these measures are secured. The Applicant's attention is drawn to ID 3.3.2 above.</p>	<p>Embedded mitigation measures for the potential sources of pollution during the operational phase are addressed within Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] and in the outline Operational Environmental Management Plan [EN010141/DR/7.5].</p>

3.4.4	<p>Controlled waters – decommissioning</p> <p>The Inspectorate considers that decommissioning phase activities are likely to be similar to those of construction, and therefore have potential to introduce new pathways for contamination and/ or the remobilisation of contaminants. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment at this stage. Accordingly, the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>An assessment of the decommissioning phase has been included in Section 12.8 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p>
3.4.5	<p>Property (potential for instability/aggressive conditions) – operation and decommissioning</p> <p>The Inspectorate has considered the characteristics of the Proposed Development and is content to scope out an assessment of this matter for the operational and decommissioning phases, noting that this matter is proposed to be scoped in for the construction phase and would inform remedial works and construction design proposals. However, should the assessment of the construction phase effects identify any ongoing risk for the operational phase this should be assessed within the ES.</p>	<p>An outline Construction Environmental Management Plan [EN010141/DR/7.3] has been produced which details procedures in the event of unexpected contamination encountered or a pollution incident and requirement for a UXO Management Plan to be produced prior to construction.</p> <p>The outline Operational Environmental Management Plant [EN010141/DR/7.5] includes mitigation/management of soils during construction phase.</p> <p>Potential contamination during maintenance works and measures to limit this is provided in Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p>
3.4.6	<p>Operational effects</p> <p>The Scoping Report states that the Proposed Development is not envisaged to impact on ground conditions during operation “<i>providing all potential effects are investigated and scoped out at the design stage of the development</i>”.</p> <p>The term “<i>design stage</i>” is not defined; it is not clear when this would occur and whether this refers to detailed design post-consent. In addition, based on the information provided in the Scoping Report, it is not clear if it would be possible to scope out all potential</p>	<p>An outline Operational Environmental Management Plan [EN010141/DR/7.5] has been prepared which sets out mitigation measures regarding unexpected contamination, leaks or spills during the operational phase of the Scheme.</p> <p>Potential contamination during maintenance works and measures to limit this is provided in Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1].</p>

	effects during detailed design. The ES should therefore include an assessment of operational effects or information demonstrating agreement with the relevant consultation bodies and the absence of LSE.	
3.4.7	<p>Agricultural usage</p> <p>The Scoping Report states that the presence of contaminated soils and groundwater on-site is likely to be limited due to the “long-standing agricultural history of the site”. Paragraph 10.6.1 notes that a Preliminary Risk Assessment (PRA) is yet to be conducted to determine the risks relating to contamination. As such, these assumptions have not been verified and there remains a risk that burial pits, fuel/ oil or agrichemical spills or areas of waste burial may be present. The ES should be supported by the findings of a PRA and where land contamination is identified, the ES should assess significant effects where they are likely to occur.</p>	<p>Phase 1 Geo-Environmental Desk Study is provided as ES Vol 2 Appendix 12-1 Phase 1 Geo-Environmental Assessment EN010141/DR/6.2] and referred to throughout ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]. The Phase 1 states there is unlikely to be significant point sources of contaminants and no tanks, or chemicals stores and such like, were observed across the scheme area during the walkover.</p> <p>The embedded mitigation measures in Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] includes a requirement for a protocol to deal with unexpected contamination and sampling for contamination analysis where disturbance of soils is proposed during construction. An outline Construction Environmental Management Plan [EN010141/DR/7.3] includes mitigation/management of soils during construction phase</p> <p>Section 12.7 of ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1] sets out the embedded mitigation during the decommissioning phase.</p>
3.4.8	<p>Minerals</p> <p>As stated in Cambridgeshire County Council’s consultation response (Appendix 2 of this Opinion), the site is located within a Minerals Safeguarding Area. This is not referenced within the Scoping Report. The ES should assess the LSE of the Proposed Development on the sterilisation of important mineral resources. The Applicant should seek agreement from the Minerals Planning Authority regarding the approach to assessment of this matter.</p>	<p>An assessment of the impact on mineral reserves is provided in ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] and at Appendix B of the Planning Statement [EN010141/DR/5.3].</p>
Cultural Heritage and Archaeology		

3.5.1	<p><i>Direct impacts to heritage assets - operation and decommissioning</i></p> <p>The Applicant proposes to scope this matter out on the basis that direct impacts of the Proposed Development on heritage assets would be limited to the construction phase. The Scoping Report states that the operational phase would not result in ground disturbance and decommissioning would not result in further direct impacts beyond those included in the assessment of construction effects.</p> <p>The Inspectorate agrees that additional significant effects during operation and decommissioning are unlikely to occur and this matter can therefore be scoped out of further assessment. Any relevant best practice or mitigation measures proposed to protect heritage assets during decommissioning should be described in an oDEMP.</p>	<p>Direct impacts during operation and decommissioning scoped out.</p> <p>Relevant best practice or mitigation measures proposed to protect heritage assets during operation and decommissioning are set out in the outline Operational Environmental Management Plan (oOEMP) [EN010141/DR/7.5] and outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6], as well as the outline Archaeological Mitigation Strategy [EN010141/DR/7.15].</p>
3.5.2	<p><i>Setting impacts to designated heritage assets - construction</i></p> <p>The Scoping Report states that impacts to the setting of designated heritage assets during construction would be temporary in nature and limited to localised areas of working. As a result the Applicant considers that any temporary effects during construction would not exceed the impacts on setting during the operational phase and proposes to scope this matter out of further assessment.</p> <p>The Inspectorate considers that there is potential for significant effects to occur to the setting of designated heritage assets during construction of the Proposed Development and does not agree to scope this matter out of further assessment. Accordingly, the ES should include an assessment of this matter or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>The potential for significant effects on designated heritage assets during the construction phase is considered in ES Vol 2 Appendix 6-4: Settings Impact Assessment [EN010141/DR/6.2] and Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
3.5.3	<p><i>Setting impacts to non-designated heritage assets</i></p> <p>The Applicant proposes to scope this matter out on the basis that non-designated assets are typically less sensitive to changes in</p>	<p>Non-designated heritage assets of potentially national importance have been identified and are set out in ES Vol 2 Appendix 6-2: Desk-Based Assessment [EN010141/DR/6.2].</p>

	<p>their settings and unlikely to be subject to significant setting effects. However, the Scoping Report states that the ES will provide an assessment of setting impacts on non-designated heritage assets that are considered to be of national importance.</p> <p>The Inspectorate is content to scope out further assessment of setting impacts to non-designated heritage assets provided the ES includes an assessment of the setting impacts on nationally important non-designated heritage assets during all phases of the Proposed Development. The ES should fully justify the choice of heritage assets included in the assessment and their locations should be depicted on a supporting plan.</p> <p>The Applicant should also seek to agree the non-designated assets included within the assessment of setting with the relevant consultation bodies, including Historic England and Local Planning Authorities.</p>	<p>An assessment of effects upon the setting of these non-designated heritage assets is provided in ES Volume 2 Appendix 6-4: Settings Impact Assessment [EN010141/DR/6.2] and Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
3.5.4	<p><i>Setting impacts to designated heritage assets beyond 3km study area</i></p> <p>The Scoping Report states that designated assets beyond 3km from the DCO boundary are too distant to have their settings significantly affected by the Proposed Development. However, no evidence has been provided to explain why the use of a 3km study area is appropriate.</p> <p>In the absence of agreement with relevant consultation bodies, or robust justification to support the final study area, the Inspectorate considers that there is potential for the Proposed Development to lead to significant effects on the setting of designated heritage assets beyond 3km and are not in a position to agree to scope this matter out. The ES should provide an assessment of the potential setting impacts to designated heritage assets located beyond 3km or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>A review of the zone of theoretical visibility indicated very limited, if no, potential for intervisibility beyond 3km (see ES Vol 3 Figures 6-7 to 6-13 [EN010141/DR/6.3]).</p> <p>Further consultation with Cambridgeshire Historic Environment Team (CHET) and Bedford Borough Historic Environment Team (BBHET) agreed a list of designated heritage assets beyond the 3km area that would need to be included within the assessment, as set out in Section 6.3 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>An assessment of effects upon the setting of these heritage assets is provided in ES Volume 2 Appendix 6-4: Settings Impact Assessment [EN010141/DR/6.2] and Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
3.5.5	<p><i>Archaeological surveys</i></p>	<p>CHET and BBHET have been consulted to determine the extent of required intrusive archaeological evaluation following issue of the</p>

	<p>The Applicant should ensure that the information used to inform the assessment is robust and allows for suitable identification of below ground assets likely to be impacted by the Proposed Development. The Applicant should make effort to agree the need for intrusive investigations (paragraph 11.5.7 of the Scoping Report indicates that trial trenching/ evaluation and excavation may be carried out) with relevant consultation bodies. Intrusive investigations should be completed prior to submission of the DCO application and reported in the ES, unless otherwise agreed with the relevant consultation bodies.</p>	<p>geophysics report, as set out in Section 6.3 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1]. A brief for the pre-determination trenching strategy was issued by BBHET and CHET for the investigations within Sites A, B, C and D. The trial trench evaluation reports are presented as ES Vol 2 Appendix 6-6 to 6-9 [EN010141/DR/6.2].</p> <p>The outline Archaeological Mitigation Strategy [EN010141/DR/7.15] sets out the approach that will be taken to further post-consent archaeological investigation.</p>
3.5.6	<p><i>Decommissioning effects</i></p> <p>The Scoping Report states that the setting of designated heritage assets may be changed during the decommissioning phase of the Proposed Development. However, a description of potential effects during decommissioning is not set out in the Scoping Report. The Applicant should ensure that the ES provides an explanation of how decommissioning would impact the setting of designated heritage sites where significant effects are likely to occur. A description of any relevant restoration measures should also be provided in the ES.</p>	<p>The potential for significant effects on heritage assets during the decommissioning phase is considered in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p>
3.5.7	<p><i>Indirect effects</i></p> <p>The ES should identify and assess any potential indirect effects on the historic environment, for example, changes in drainage patterns or compression of the ground from infrastructure which could affect below ground heritage assets or lead to subsidence of above ground buildings and monuments.</p>	<p>The potential for indirect physical impacts is considered in Section 6.8 of ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1].</p> <p>Liaison with the hydrology team indicates that as there are no significant excavations or underground obstructions that could affect groundwater movement, it is not anticipated that there would be any significant impacts on groundwater. The outline Surface Water Management Plan [EN010141/DR/7.13] would mitigate against any potential increase in run-off and so it is also not anticipated that there would be any increase in scour that could affect archaeology. On this basis no significant indirect physical effects are anticipated.</p>
Noise and Vibration		

3.6.1	<p><i>Vibration from construction traffic</i></p> <p>The Inspectorate notes that vibration from the construction phase is scoped into the ES. However, vibration from construction traffic has been scoped out. Paragraph 12.5.14 of the Scoping Report states that “<i>vibration from HGV movements even when very close to properties does not tend to produce any measurable vibration unless the road condition is very poor, and the intensity of movement is significant.</i>” The condition of the road has not been assessed, nor has the anticipated number and type of construction vehicles been provided within this chapter to justify why vibration from construction traffic should be scoped out.</p> <p>The ES should provide evidence to confirm that ground-borne vibration generated from HGV movements (including along access routes) during construction and decommissioning would not result in significant effects on sensitive receptors or include an assessment of the LSE, unless otherwise agreed with relevant consultation bodies.</p>	<p>Vibration from construction traffic has been included in the assessment.</p> <p>Comments on construction HGV vibration are presented in Section 10.8 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]. Studies of measured vibration in close proximity to HGVs on local roads in the UK carried out by the author of the assessment show no significant levels of vibration.</p> <p>Refer to ES Vol 2 Appendix 10-3: Construction Plant Data [EN010141/DR/6.2] which includes a section on sample test data from vibration measurements from HGVs and other vehicles on local roads and access roads in the UK. The results show no significant vibration levels are likely and no exceedance of nuisance thresholds or cosmetic damage criteria and therefore no significant effect.</p>
3.6.2	<p><i>Vibration from operational plant</i></p> <p>The Scoping Report states that the type of equipment present during the operational phase is of a type that does not generate a perceptible level of vibration. On this basis, the Inspectorate is in agreement that an assessment of operational vibration can be scoped out of further assessment.</p>	<p>Scoped out as no perceptible vibration would occur at NSR. Section 10.4 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] provides comment on operation vibration.</p>
3.6.3	<p><i>Noise and vibration effects – decommissioning</i></p> <p>The Applicant proposes to scope out an assessment of decommissioning phase effects as these are likely to be similar or less significant than effects during construction. Limited information is provided regarding the activities proposed for the decommissioning phase. As noted in ID 3.6.1 above, indicative traffic numbers are not provided for either the construction or decommissioning phases in relation to noise and vibration, and so</p>	<p>Comments are provided in the assessment of effects in Section 10.8 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]. When decommissioning occurs, it is reasonable to assume that similar techniques and mitigation measures would be used, and the outcome of the construction phase assessment remains a reasonable proxy for the assessment of decommissioning. Impacts would be expected to be equivalent or less than those associated with the construction phase.</p>

	<p>there is little evidence to support the claim that the decommissioning phase impacts would be less significant than during construction.</p> <p>In the absence of information such as evidence demonstrating that decommissioning activities would not result in noise and vibration effects greater than construction or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>An outline Decommissioning Environmental Management Plan [EN010141/DR/7.6] has been provided with further detail relating to mitigation measures.</p>
3.6.4	<p>Grid connection assessment</p> <p>The Scoping Report does not identify any NSRs within the grid connection route or state that any baseline monitoring would be undertaken within this area. In the absence of information such as a justification as to why LSE would not arise or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter out from further assessment. Accordingly, the ES should include an assessment of this matter or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>An assessment of impacts in relation to the grid connection is provided in Section 10.8 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]. The assessment references the guidance found within BS5228 Part 1 for Noise which sets out specific absolute noise limits (the assessment uses the lowest required limit for daytime operations for robustness) and therefore establishment of baseline levels are not required.</p>
3.6.5	<p>Study area</p> <p>The ES should include a plan based on Figure 12-2 showing the 500m buffer from the noise sources, along with noise contours to confirm how the noise sensitive receptors (NSR) have been determined. A figure should also be provided showing the final study area; the Applicant is advised to seek to agree the study area with the relevant Environmental Health Officers.</p>	<p>ES Vol 3 Figure 10-1 [EN010141/DR/6.3] shows the noise sensitive receptors relative to the overall Site and the location of baseline sound monitoring positions, which were agreed with the Environmental Protection Officer at Huntingdonshire District Council on behalf of the host authorities (as set out in Section 10.3 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1]). Noise contours across the Site have been provided in ES Vol 2 Appendix 10-4: Noise Contour Mapping [EN010141/DR/6.2].</p>
3.6.6	<p>Baseline noise monitoring</p> <p>The Scoping Report states that noise data was collected in July and October 2022 and August 2023. The ES should provide confirmation of the dates and whether these dates fell within school</p>	<p>The original survey data was undertaken and used to provide indicative levels for design constraints and for review and optimisation of the design. Further detailed surveys outside of school holidays have been undertaken in 2024 which covered</p>

	<p>holidays. If these dates are within school holidays, then justification is required to confirm why these dates represent a suitable baseline. Further consideration to include another comparative survey data not within school holidays may be required to provide a robust dataset.</p>	<p>weekend periods to cover the lowest likely background sound levels for robustness. The baseline for assessment is reported in Section 10.6 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] and ES Vol 2 Appendix 10-2: Baseline Noise Survey [EN010141/DR/6.2].</p>
3.6.7	<p>Scope summary</p> <p>Within Section 12.5 of the Scoping Report, vibration is specifically mentioned as being scoped in or out at various stages, however the summary of the scope for the noise and vibration assessment in Table 12.3 does not include reference to vibration. The scope of the ES should be consistent and clear.</p>	<p>An assessment of construction vibration has been included within ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1], including plant vibration and HGV vibration. Operational vibration is stated in Section 10.4 of the chapter as being imperceptible and therefore scoped out of the ES.</p>
3.6.8	<p>Noise monitoring locations</p> <p>The Inspectorate notes that not all of the identified NSRs are subject to noise monitoring in a nearby location. The Applicant should ensure that the noise monitoring provides sufficient coverage across the entire study area to ensure a robust baseline has been assessed. Efforts should be made to agree the noise monitoring locations with the Local Planning Authorities.</p>	<p>Baseline monitoring positions were considered to ensure sufficient coverage and positions were agreed with the Environmental Protection Officer at Huntingdonshire District Council on behalf of the host authorities, as set out in Section 10.3 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1].</p>
3.6.9	<p>Standards and guidance</p> <p>The criteria for assessing the significance of noise and vibration effects should be clearly set out in the ES with reference to established guidance. Consistency with the Noise Policy Statement for England, the Significant Observed Adverse Effect Level (SOAEL) and Lowest Observed Adverse Effect Level (LOAEL) should be defined for all of the construction, operational and decommissioning noise matters assessed.</p>	<p>The criteria have been clearly set out in the assessment methodology at Section 10.3 of ES Vol 1 Chapter 10: Noise and Vibration [EN010141/DR/6.1] with reference to noise and vibration and cross referencing of noise effect levels as defined in NPSE.</p>
Socio-economics, Land Use and Tourism		
3.7.1	<p>Socio-economics, land use and tourism</p>	<p>The assessment has been revised to scope in and assess socio-economic, development land, and tourism impacts at ES Vol 1</p>

	<p>The Applicant proposes to scope out an assessment of socio-economics, land use and tourism from the ES on the basis that the most notable effects would be temporary and only occur during the construction and decommissioning phases of the Proposed Development.</p> <p>The Inspectorate considers that whilst the construction and decommissioning phases may be relatively short, the potential for significant effects remains and the impacts should be appropriately assessed in the ES. The Scoping Report provides limited information to justify scoping out an entire assessment of socio-economic, land use and tourism effects, particularly with regards to construction and decommissioning. The Inspectorate cannot agree to scope out an assessment of socio-economics, land use and tourism at this stage. The ES should provide an assessment of this aspect, with the matters to be scoped into the assessment as discussed below.</p>	Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1].
3.7.2	<p><i>Employment and Gross Value Added (GVA)</i></p> <p>The Applicant proposes to scope out these matters on the basis that permanent employment and GVA benefits arising at each phase of the Proposed Development are likely to be limited. Paragraph 13.5.4 of the Scoping Report notes that an estimated 200-300 workers may be required to relocate during the construction phase. However, a full estimate of the number of temporary workers required during the construction and decommissioning phases of the Proposed Development is not provided.</p> <p>The Inspectorate is not content to scope out these matters and advises that the number and types of jobs created should be estimated in the ES and considered in the context of the available workforce in the area during each phase of the Proposed Development. The ES should also provide an estimate of the duration of temporary employment during the construction and decommissioning phases.</p>	<p>The assessment has been revised to scope in and assess employment effects at Section 14.8 of ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1].</p>

3.7.3	<p><i>Effects on local services</i></p> <p>The Scoping Report states that an estimated 200-300 workers may be required to relocate during the construction phase, however, the Applicant considers that the temporary increase in demand on health and other services during construction of the Proposed Development would only result in a marginal effect on local services and proposes to scope this matter out of further assessment.</p> <p>The Inspectorate considers that the ES should define a worst-case scenario of construction worker numbers and assess impacts on the availability of local accommodation and services during the construction and decommissioning phases.</p>	<p>The assessment has been revised to scope in and assess impacts on the availability of local accommodation and services during the construction and decommissioning phases at Section 14.8 of ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1].</p>
3.7.4	<p><i>Volume and value of visitor economy – construction and decommissioning</i></p> <p>The Applicant proposes to scope out this matter on the basis that the local area is not a well-established tourism destination and potential effects during construction and decommissioning would be mitigated through a CEMP. However, the Scoping Report states that there is a range of visitor accommodation in the area.</p> <p>Whilst the Inspectorate notes the geographical location and separation of the Proposed Development from the nearest settlements, tourism is not restricted to these settlements and limited justification is provided to explain how mitigation measures might be implemented to limit impacts to the visitor economy. In the absence of information detailing the measures proposed to mitigate effects during construction and decommissioning, the Inspectorate considers that the ES should include an assessment of visitor economy effects during the construction phase and identify any likely impacts during the decommissioning phase.</p>	<p>The assessment has been revised to scope in and assess impacts on the visitor economy at Section 14.8 of ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1].</p>
3.7.5	<p><i>Volume and value of visitor economy - operation</i></p> <p>The Inspectorate considers that due to the limited number of workers estimated to be at the site at any one time during operation</p>	<p>The Applicant notes this comment.</p> <p>No further response required.</p>

	of the Proposed Development, significant effects are not likely to occur and agrees that this matter can be scoped out of further assessment.	
3.7.6	<p>Fiscal impacts</p> <p>The Scoping Report states that fiscal impacts from the Proposed Development would be minor, however no figures for potential fiscal benefits have been provided. Without additional information it is not possible to assess the significance of potential effects and the Inspectorate cannot agree to scope this matter out at this stage. The ES should include an assessment of fiscal impacts during operation of the Proposed Development or provide information to demonstrate the absence of LSE.</p>	The assessment has been revised to scope in and assess fiscal impacts at Section 14.8 of ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1] .
3.7.7	<p>Data sources</p> <p>The data sources included should state the age of the data, so it is clear whether the most up to date information is used, and if not, then the ES should provide justification to explain why the information included in the assessment represents the most robust baseline.</p>	The assessment has been revised to ensure that the most up-to-date relevant information sources are included and referenced as part of ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism [EN010141/DR/6.1] .
Traffic and Transport		
3.8.1	<p>Traffic impacts on the A1</p> <p>Paragraph 14.2.5 of the Scoping Report states that the traffic impacts on the A1 have not been considered as part of the assessment on the basis that the trip generation from the site to this route will be low. No evidence has been provided to confirm how trafficked the A1 is in this location. Moreover, additional information is required regarding which phase this is relevant to, as there could be significant effects in the construction and decommissioning phases.</p> <p>The Inspectorate considers that this matter should be subject to further assessment in the ES, or supporting evidence should be</p>	An assessment of the potential increase in traffic flow on the A1 has been included within Section 9.8 of ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] .

	provided demonstrating the absence of LSE and agreement with the relevant consultation bodies.	
3.8.2	<p><i>Transport effects - operation</i></p> <p>The Applicant proposes to scope out transport effects during the operational phase on the basis that anticipated traffic would be minimal. The traffic levels expected to be generated are based on the assumption that 10 to 16 permanent staff would be on-site at any one time using four-wheel drive vehicles or vans. HGV access to the site is described as being rare and associated with the repair and replacement of on-site infrastructure.</p> <p>The Inspectorate has considered the characteristics of the operational phase of the Proposed Development and based on the low levels of anticipated traffic generation is content that this matter can be scoped out of further assessment. The ES description of the operational phase of the Proposed Development should clearly set out the operational vehicle types and numbers to justify this position.</p>	An assessment of the forecast trip generation during the operational phase has been included within Section 9.8 of ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] .
3.8.3	<p><i>Transport effects - decommissioning</i></p> <p>The Applicant proposes to scope out a standalone assessment for the decommissioning phase of the Proposed Development. Decommissioning is anticipated to be similar in duration and nature to the construction phase and impacts are expected to be similar to the construction phase.</p> <p>The Scoping Report states that the vehicle movements required during decommissioning are not known at this stage and that a DEMP will be prepared in due course. The Inspectorate is content that a standalone assessment for the decommissioning phase is not required at this stage provided that an oDEMP is submitted with the application.</p>	An outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6] has been prepared as part of the application.
3.8.4	<i>Hazardous loads</i>	An outline Construction Traffic Management Plan (oCTMP) [EN010141/DR/7.4] has been prepared as part of the application,

	<p>The Scoping Report states that there are no nearby road features which suggest that the transfer of materials poses a risk beyond what would be expected on the general highway network.</p> <p>The Inspectorate has considered the characteristics of the Proposed Development and considers that this matter may be scoped out of further assessment, however the ES should explain the measures employed to ensure safe vehicular transport of components, such as panels and batteries, to and from the site.</p>	<p>which sets out the proposed measures to ensure safe vehicular transport of materials to the Site.</p>
3.8.5	<p>Guidance</p> <p>The Scoping Report states that the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement (1993) has been used to determine the scope of the assessment. This guidance has now been superseded by the Environmental Assessment of Traffic and Movement guidance from IEMA, which was published in July 2023 and should be referred to in the ES.</p>	<p>The assessment set out within ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1] has been undertaken with reference to the most recently published 2023 IEMA guidance document, as set out within Section 9.4.</p>
3.8.6	<p>PRoW surveys</p> <p>A PRoW Management Plan is proposed to be submitted with the DCO as there are numerous PRoWs in proximity to the site. The PRoW Management Plan should be informed by surveys of the PRoWs affected to ensure that the baseline usage of the PRoWs has been accounted for. A figure of the PRoW locations should also be provided, and the ES should assess impacts to PRoW receptors where significant effects are likely to occur.</p>	<p>As set out in the outline Public Rights of Way Management Plan [EN010141/DR/7.8], public right of way (PRoW) usage surveys will be undertaken where required to inform preparation of the final PRoW Management Plan.</p> <p>The PRoW network is illustrated in the Street Works, Rights of Way and Access Plan [EN010141/DR/2.4].</p> <p>An assessment of the impacts to PRoW receptors where significant effects are likely to occur has been included within ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1].</p>
3.8.7	<p>Magnitude of impact</p> <p>The Scoping Report states that an increase of fewer than 30 trips regardless of proportional increase is a negligible impact. This is stated to be derived from professional judgement and experience.</p>	<p>The impacts of traffic associated with the Scheme have been assessed across the whole study area within ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1], with the effects determined based on the identified percentage impact on each link in line with the IEMA guidelines, as set out in Section 9.4 of the chapter.</p>

	Any use of professional judgement to assess effects should be fully justified within the ES.	
3.8.8	<p>Transport Assessment (TA)</p> <p>The TA is described in the Scoping Report as including “<i>estimated trip generation including a description of the methodology used to describe forecast development trips</i>”. The Applicant should state and explain which modelling software they will be using such as the newly updated Department for Transport (DfT) TEMPRO model, and how the inputted traffic movements have been predicted. The relationship between the TA outcomes and the ES should also be made clear, with a suggestion to agree parameters with the Local Highway Authority.</p>	<p>The methodology used to forecast baseline traffic flows and development trip generation is set out within Section 9.4 of ES Vol 1 Chapter 9: Traffic and Transport [EN010141/DR/6.1].</p> <p>A Transport Assessment has been prepared as ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2].</p>
Climate Change		
3.9.1	<p>Climate change effects - construction and decommissioning</p> <p>The Inspectorate agrees that changes in precipitation, frequency and magnitude of wind and storms, summer temperatures and changes in cloud cover as a result of climate change are unlikely to give rise to significant effects on the construction and decommissioning phases of the Proposed Development. Therefore, the Inspectorate is content to scope these matters out of further assessment. However, the ES should explain how the Proposed Development has been designed to be resilient to such effects.</p>	<p>This has been addressed within ES Vol 2 Appendix 15-3: Climate Resilience Assessment [EN010141/DR/6.2], and assessed in ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1].</p>
3.9.2	<p>Changes in water availability</p> <p>The Scoping Report identifies the potential for changes in water availability to alter soil acidity, which can increase the deterioration of building materials. Given that paragraph 15.5.5 states that materials used will be chosen to be appropriate for existing ground conditions and would be able to withstand changes in soil acidity as a result of changes in water availability, the Inspectorate is content</p>	<p>This has been addressed within the effects of reduced precipitation within ES Vol 2 Appendix 15-3: Climate Resilience Assessment [EN010141/DR/6.2]. Materials and equipment which is suitable for the site will be chosen, as set out in the outline Construction Environmental Management Plan [EN010141/DR/6.1].</p>

	to scope this matter out. The ES should explain how the use such materials would be secured in the application.	
3.9.3	<p>Sea level rise</p> <p>The Applicant explains that the Proposed Development is not located in an area that is susceptible to sea level rise. The Inspectorate agrees that significant effects are not likely to occur and an assessment of sea level rise in the climate change chapter can be scoped out of further assessment.</p>	<p>The Applicant notes this comment.</p> <p>No further response required.</p>
3.9.4	<p>Changes to snow and ice</p> <p>The Inspectorate agrees to scope this matter out on the basis that UKCP18 predictions anticipate less snow and ice than the current baseline and that the risk from snow and ice is not anticipated to increase with climate change.</p>	<p>The Applicant notes this comment.</p> <p>No further response required.</p>
3.9.5	<p>Greenhouse Gas (GHG) emissions</p> <p>The ES should provide an assessment of GHG emissions for the whole lifetime of the Proposed Development. This includes consideration of GHG emissions from the listed activities during construction, operation and decommissioning. Therefore, these matters should be assessed for the lifetime of the Proposed Development and the Inspectorate does not agree to scope these matters out of further assessment.</p>	<p>The scope of assessment for ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] has been expanded to include the construction, operational and decommissioning phases. The results of this assessment are reported in Section 15.8 of ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1].</p>
3.9.6	<p>GHG emissions related to the leakage of GHGs - construction and decommissioning</p> <p>Notwithstanding the advice set out in ID 3.9.5 above, that the ES should include an assessment of GHG emissions for the whole lifetime of the Proposed Development, the Inspectorate agrees to scope this matter out of further assessment on the basis that impacts would be limited to the operational phase only, for which an operational phase assessment has been proposed.</p>	<p>ES Vol 2 Chapter 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] and ES Vol 1 Chapter 15: Climate Change [EN010141/DR/6.1] provide the assessment of impacts and effects.</p>

3.9.7	<p><i>Travel of construction workers</i></p> <p>The Applicant proposes to scope this matter out on the basis that emissions from the travel of construction workers are expected to be negligible in context of the other sources of emissions during construction and the overall GHG emissions savings associated with the Proposed Development. In the absence of further detail, the Inspectorate cannot agree to scope this matter out at this time.</p> <p>The ES should provide an assessment of the GHG emissions associated with the travel of construction workers or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.</p>	<p>The scope of assessment for ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] has been expanded to include travel of construction workers.</p>
3.9.8	<p><i>Energy consumption, material and waste generation from ongoing site maintenance</i></p> <p>The Scoping Report states that operational emissions related to maintenance are expected to be negligible in context to the overall GHG emissions and proposes to scope this matter out.</p> <p>As advised above, the ES should provide an assessment of GHG emissions for the entire lifetime of the Proposed Development, including as a result of energy consumption, material and waste generation from ongoing site maintenance. Therefore, the Inspectorate cannot agree to scope out this matter from further assessment.</p>	<p>The scope of assessment for ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] has been expanded to include energy consumption, material and waste generation from ongoing site maintenance.</p>
3.9.9	<p><i>Travel for workers</i></p> <p>The Applicant proposes to scope this matter out on the basis that emissions from the travel of workers are expected to be negligible in context of the other sources of emissions and the overall GHG emission savings associated with the Proposed Development.</p> <p>In the absence of further detail, the Inspectorate cannot agree to scope this matter out at this time. The ES should provide an assessment of the GHG emissions associated with the travel of</p>	<p>The scope of assessment for ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] has been expanded to include travel of workers.</p>

	workers or provide evidence to demonstrate the absence of LSE including agreement with relevant consultation bodies.	
3.9.10	<p>Loss of peat</p> <p>The Applicant explains that peat is not present at the site. The Inspectorate agrees that on this basis significant effects are not likely to occur and an assessment of the loss of peat in the climate change chapter can be scoped out of further assessment. However, should peat be discovered on-site, the ES should provide an assessment of the potential effects on GHG emissions from the loss of peat during construction of the Proposed Development.</p>	<p>Comment required no changes to the scope of ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] but reference has been made to the required protocol in the outline Construction Environmental Management Plan [EN010141/DR/7.3] should peat be discovered on Site as part of ground investigations.</p>
3.9.11	<p>Energy consumption from the provision of clean water and treatment of wastewater</p> <p>The Applicant proposes to scope this matter out on the basis that energy consumption from the provision of clean water and treatment of wastewater is expected to be negligible in context to the overall GHG emission savings. In the absence of further detail, the Inspectorate cannot agree to scope this matter out at this time.</p> <p>The ES should provide an assessment of potential GHG emissions associated with energy consumption from the provision of clean water and treatment of wastewater related to the Proposed Development or provide evidence to demonstrate the absence of LSE.</p>	<p>The scope of assessment for ES Vol 2 Appendix 15-1: Greenhouse Gas Emissions Assessment [EN010141/DR/6.2] has been expanded to include energy consumption from the provision of clean water and treatment of wastewater.</p>
3.9.12	<p>Cumulative effects</p> <p>The ES should consider how other developments cumulatively may affect the vulnerability of the Proposed Development to climate change eg any changes in flood flows, and cumulative GHG emissions/ savings. The Applicant should seek to agree the approach to the climate change cumulative effects assessment with relevant consultation bodies.</p>	<p>An In-Combination Climate Change Impact Assessment for the Scheme is provided at ES Vol 2 Appendix 15-4 [EN010141/DR/6.2].</p>
Air Quality		

3.10.1	<p><i>Non-road mobile machinery (NRMM) and plant exhaust emissions</i></p> <p>The Inspectorate does not agree that emissions from NRMM can be scoped out as no information has been provided on the type, number and location of such machinery within the Proposed Development site. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>An assessment of possible effects associated with NRMM emissions has been included within Section 11.8 of ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1].</p>
3.10.2	<p><i>On-road vehicle exhaust emissions – operation</i></p> <p>The Inspectorate agrees that operational vehicle emissions may be scoped out from further assessment, subject to the description of development demonstrating that vehicle numbers are sufficiently low as to not trigger the thresholds for an air quality assessment.</p>	<p>As set out in Section 11.4 of ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1], vehicle movements to / from the Site during the operational phase would be well below relevant screening thresholds.</p>
3.10.3	<p><i>Dust emissions – operation</i></p> <p>The Inspectorate agrees that once operational, the Proposed Development is unlikely to result in significant air quality effects as the components of the Proposed Development do not generate dust emissions. The Inspectorate is content to scope this matter out of further assessment on this basis.</p>	<p>The Applicant notes this comment. No further response required.</p>
3.10.4	<p><i>Dust and on-road vehicle exhaust emissions – decommissioning</i></p> <p>The Scoping Report states that potential air quality effects during decommissioning are anticipated to be of lesser magnitude than the construction phase and proposes to scope this matter out. However, limited details regarding the potential decommissioning activities have been provided in the Scoping Report.</p>	<p>An assessment of possible effects associated with dust and on-road and NRMM emissions associated with the decommissioning phase has been included within Section 11.8 of ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1].</p>

	<p>In the absence of information such as evidence demonstrating that decommissioning activities would not result in dust and on-road exhaust emission effects greater than construction or clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly, the ES should include an assessment of these matters or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	
3.10.5	<p><i>Cumulative effects – operation and decommissioning</i></p> <p>As stated in ID 3.10.2 to 3.10.4 above, additional information is required from the Applicant to confirm that there will not be significant effects in the operational and decommissioning phases.</p> <p>The ES should provide information on the cumulative nature of traffic movements with other developments during the operational and decommissioning phases and confirm these projections fall below the relevant thresholds set out in guidance. In the absence of this information, the Inspectorate is not a position to scope these matters out at this stage. Accordingly, the ES should include an assessment of these matters or provide information demonstrating agreement with the relevant consultation bodies and the absence of LSE.</p>	<p>An assessment of cumulative effects with other projects has been provided in Section 11.11 of ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1] and in ES Vol 1 Chapter 17: Cumulative Effects [EN010141/DR/6.1].</p>
3.10.6	<p><i>Vehicle exhaust emissions study area</i></p> <p>The Inspectorate notes that it is intended for the study area relating to vehicle exhaust emissions to account for receptors within 200m of the access/ egress points off the public highway. However, the Inspectorate notes that it is intended for the Proposed Development to utilise a temporary haul road through the site. The Inspectorate is of the view that this haul road should also be considered with regards to construction vehicle emissions, and any potential receptors located within 200m of the haul road should be included in the assessment.</p>	<p>Section 11.8 of the ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1] has included consideration of construction phase vehicle movements within the Site along internal access roads.</p>

3.10.7	<p>Baseline data</p> <p>The Scoping Report states that ambient air quality monitoring is not considered necessary to inform the air quality assessment in the ES but is subject to review and confirmation. Efforts should be made to reach agreement regarding the requirement and extent of air quality monitoring with the relevant Local Planning Authorities.</p>	As set out in Section 11.3 of ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1], the Applicant has discussed with the local planning authority and agreed that that additional monitoring will not be required.
3.10.8	<p>Plan</p> <p>The ES should be accompanied by an appropriate plan illustrating the location of sensitive air quality receptors within the vicinity of the Proposed Development to aid understanding of the extent of effects.</p>	A plan of sensitive air quality receptors within the Air Quality Study Areas is provided as ES Vol 3 Figure 11-1: Construction Dust Study Area [EN010141/DR/6.3] .
3.10.9	<p>Defining significance</p> <p>Paragraph 16.6.2 of the Scoping Report sets out the factors that will be considered in order to determine whether a predicted effect is significant. However, the Scoping Report does not refer to any guidance regarding assessing significance of air quality effects. The ES should explain how air quality impacts have been identified and the methodology that will be used to determine the significance of effects, including reference to any relevant guidance. Any use of professional judgement to assess significance should be fully justified within the ES.</p>	The assessment methodology for determining the significance of air quality effects is provided in Section 11.4 of ES Vol 1 Chapter 11: Air Quality [EN010141/DR/6.1] .
Land and Soils		
3.11.1	<p>Impacts on agricultural land – construction and decommissioning</p> <p>The Applicant proposes to scope out effects on agricultural land during construction and decommissioning on the basis that any effects would be short-term and would relate to potential impacts on soil rather than agricultural productivity. These phases are anticipated to last up to 24 months each.</p>	ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] provides an assessment of land and soil receptors at the construction, operational and decommissioning phases of the Scheme.

	<p>Considering the relatively short-term nature of the construction and decommissioning phases, the Inspectorate is content that an individual assessment of agricultural land loss for the construction and decommissioning phases it not required. However, the ES should ensure that effects of agricultural land loss are assessed over the entire lifetime of the Proposed Development including the construction, operational, and decommissioning phases.</p>	
3.11.2	<p><i>Impacts on soils – operation</i></p> <p>The Applicant proposes to scope out effects during the operational phase on the basis that the temporary removal of parts of the site from arable cultivation would have beneficial effects on soils by allowing soil to “rest” and promote carbon sequestration. Schedule 4 of the EIA Regulations state that both positive and negative effects should be reported. As such, the Inspectorate does not agree to scope this matter out of further assessment. The ES should provide an assessment of any beneficial and adverse effects of the Proposed Development on soil resources during operation.</p>	<p>ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] provides an assessment of land and soil receptors at the construction, operational and decommissioning phases of the Scheme.</p>
3.11.3	<p><i>Agricultural land classification (ALC) surveys</i></p> <p>Paragraph 17.4.10 states that “<i>the Applicant has undertaken a detailed Agricultural Land Classification survey for the site...in accordance with Natural England guidance</i>”, however it is stated in paragraph 1.7 of the ALC Report (Scoping Report, Appendix 17-1) that surveys were undertaken at one auger per four hectares. It is noted (in paragraph 1.7 of Appendix 17-1) that this is due to the “<i>large area of agricultural land</i>”.</p> <p>Natural England (NE) guidance (namely Technical Information Note TIN049) states that a detailed ALC survey requires a frequency of one boring per hectare. The ES should justify the extent of survey efforts and ensure that the text is consistent between the ES and any associated appendices.</p>	<p>As set out in Section 13.3 of ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] Applicant has consulted with Natural England and has undertaken a more detailed agricultural land classification survey, which is reported in ES Vol 2 Appendix 13-1 [EN010141/DR/6.2].</p>
3.11.4	<p><i>ALC surveys for the grid corridor</i></p>	<p>As set out in Section 13.3 of ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] Applicant has consulted with Natural England</p>

	<p>The Scoping Report states that a detailed ALC survey was conducted for East Park Sites A to D (included as Appendix 17-1 of the Scoping Report). It is stated that a survey of the grid corridor route was not conducted on the basis that impacts would be temporary and for a short duration, with soils being reinstated in line with guidance.</p> <p>Effects and surveys should be considered for the grid connection corridor as well as the solar PV sites where there is potential for significant effects to occur.</p>	<p>and has undertaken a more detailed agricultural land classification survey, including of the grid corridor.</p> <p>ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] provides an assessment of land and soil receptors which includes for the cable corridors and grid connection.</p>
3.11.5	<p>Sheep grazing</p> <p>The Scoping Report states that sheep grazing is assumed under the PV panels however it is noted (in paragraph 17.7.1) that it is not currently confirmed how the land will be managed. Where the ES relies upon grazing as mitigation, it should be demonstrated that the land is not subject to restrictive covenants that would prevent such use and that such mitigation is secured in respect of the operation of the Proposed Development.</p>	<p>The Applicant intends to graze the solar arrays on rotation during the operational life of the Scheme. The outline Landscape and Ecological Management Plan [EN010141/DR/7.7] provides an overview of the management process.</p>
3.11.6	<p>Effects on farm businesses</p> <p>The ES should identify the agricultural land uses that will be displaced by the Proposed Development. Potential effects on farm businesses, loss of agricultural production and implications for food security from both the PV solar site and grid connection should be considered where there is potential for significant effects to occur. This should consider both effects alone and cumulatively with other projects. Effects such as severance to farm access or changes to the scale and long-term viability of farm holdings affected by the Proposed Development should also be considered.</p>	<p>ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] provides an assessment of land and soil receptors at the construction, operational and decommissioning phases of the Scheme.</p> <p>Further consideration of agricultural land and food security is also provided in Section 7.15 of the Planning Statement [EN010141/DR/5.3].</p>
Other Environmental Topics		

3.12.1	<p>Human health</p> <p>The Scoping Report states that effects of the Proposed Development which have the potential to affect human health would be adequately covered within the proposed scope of the ES and a standalone human health assessment is not required. The Inspectorate agrees that a standalone chapter can be scoped out of further assessment provided that effects on human health, including impacts on mental health and wellbeing, are considered within other aspect chapters where relevant.</p> <p>The EIA Methodology chapter should provide clear cross-referencing to where the relevant direct and indirect impacts on human health receptors are considered in the ES. Where human health impacts have been assessed in the ES, consideration should be given to relevant guidance such as the IEMA 2022 guidance <i>'Determining Significance For Human Health In Environmental Impact Assessment'</i>.</p>	<p>Section 16.2 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] sets out an assessment of human health, including matters relating to mental health and wellbeing.</p>
3.12.2	<p>Major accidents and disasters</p> <p>An assessment of major accidents and disasters is proposed to be scoped out of the ES. The Inspectorate considers that a standalone chapter can be scoped out of further assessment, but the potential risks should be considered in other ES Chapters where relevant. For the avoidance of doubt, the risk of fire associated with battery storage facilities should be assessed in the ES and relevant mitigation, such as fire-fighting and containment measures, should be set out and secured in the DCO, with reference to the proposed Outline Battery Safety Management Plan.</p>	<p>Section 16.4 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] sets out an assessment of major accidents and disasters, including BESS fire risk.</p> <p>An outline Battery Safety Management Plan [EN010141/DR/7.10] has been prepared as part of the application, which includes a BESS fire emissions modelling assessment.</p>
3.12.3	<p>Waste</p> <p>The Applicant proposes to scope out an assessment of waste. The Scoping Report concludes that significant effects as a result of waste are unlikely due to the recycling value of most the solar panel's component parts. The Inspectorate notes the commitment to describe the approach to waste management in the ES and to</p>	<p>Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] sets out a waste assessment for the Scheme including estimates of waste generation for each phase of the Scheme.</p>

	<p>provide a Construction Site Waste Management Plan (CSWMP) and Decommissioning Resource Management Plan (DRMP).</p> <p>Having noted this, the Inspectorate considers that the ES should provide an assessment of the likely significant effects from waste at decommissioning to the extent that it is possible at this time. The ES should also include estimates, by type and quantity, of expected residues, and emissions, and quantities, and types of waste produced during the construction and operation phases in line with Schedule 4 of the EIA Regulations. As such, the Inspectorate is not content to scope this aspect out.</p>	<p>An outline Waste Management Plan [EN010141/DR/7.12] has been prepared as part of the application, covering each phase of the Scheme.</p>
3.12.4	<p><i>Electromagnetic Fields (EMF)</i></p> <p>The Inspectorate draws the Applicant's attention to the UK Health Security Agency's (UKHSA) consultation response (see Appendix 2 of this Opinion).</p> <p>The Scoping Report states that the voltage of the grid connection cables between the onsite East Park substation and the existing National Grid Eaton Socon substation are likely to be 400kV. In line with relevant guidance (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012), cables above 132kV have potential to cause EMF effects. The Inspectorate considers that the ES should demonstrate the design measures taken to avoid the potential for EMF effects on receptors.</p>	<p>Section 16.4 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] sets out an assessment of electromagnetic fields.</p>
3.12.5	<p><i>Waste generated</i></p> <p>The Scoping Report does not identify panel or battery degradation leading to replacement, as a type of waste that may be produced during the life of the Proposed Development. This would entail larger amounts of waste than described in the Scoping Report. This potential waste and how this will be managed, as well as any arising significant effects, should be addressed in the ES.</p>	<p>Section 16.3 of ES Vol 1 Chapter 16: Other Environmental Topics [EN010141/DR/6.1] sets out a waste assessment for the Scheme, including waste estimates at the construction, operational and decommissioning phases.</p>

