19 March 2026

East Park Energy Development Consent Order (EN010141) – Post-hearing submissions including written submissions of any oral cases heard at OFH1, ISH1 and ISH2

Stop East Park Energy (SEPE) respectfully submits the attached notes following the Preliminary Meeting, Open Floor Hearing and Issue Specific Hearings, which set out the comments made on behalf of Stop East Park Energy during the hearings. These notes are provided for the assistance of the Examining Authority and to ensure an accurate record of the points raised.

This submission is made without prejudice to Stop East Park Energy's full Written Representation and any further submissions to be provided in accordance with the Examination timetable, including material to be submitted on or before Deadline 1. Nothing in these notes should be taken as limiting, qualifying or replacing the detailed case that will be presented in those subsequent submissions.

Tuesday, 17 March 2026

Preliminary Meeting

Mr Pike, nominated spokesperson for SEPE, raised a legitimate question as to whether SEPE's written submission provided in advance of the Preliminary Meeting on 10 March 2026, in accordance with the Examination timetable, containing c.24 questions on the Examination procedure (document reference PDA-025), had or would be taken into account by the Examining Authority when considering the conduct and scope of the Examination.

Open Floor Hearing

Stop East Park Energy is a community-led, voluntary and unfunded group established in response to the East Park Energy proposal. It comprises and represents c.1,000 residents, landowners and stakeholders from nearby settlements who may be directly or indirectly affected by the proposed development.

A community that participated in the statutory consultation process in good faith with the expectation that their evidence would meaningfully influence the scheme, yet the proposal before the Examination suggests that this input has had limited effect.

I speak today to assist the Examination by highlighting matters that affect confidence in the evidence before it. Our submission does not oppose renewable energy in principle. Rather, we submit that this particular proposal has not been demonstrated to be appropriately sited, proportionate, or supported by sufficiently robust environmental evidence.

At the heart of our concerns is a fundamental issue of decision-stage confidence. The Environmental Statement leaves multiple critical matters unresolved, and the Draft Development Consent Order does not secure the mitigation on which the assessment depends. Taken together, these factors raise legitimate questions as to whether the likely significant effects of the development have been fully identified, assessed and controlled to the standard required for a project of this scale and duration.

At its core, this case turns on a simple question. Not whether renewable energy is needed, but whether this project, in this location, on this evidence, is justified?

Most notably, the scheme would result in the long-term loss of a nationally significant area of Best and Most Versatile agricultural land. National policy does not prohibit development on such land, but it does expect a transparent approach demonstrating that lower-conflict alternatives have been properly considered and that the chosen site represents the least harmful practicable option. It is not clear that such a demonstration has yet been provided.

The proposed development is also unusually dispersed, extending across approximately twelve and a half kilometres as a patchwork of non-contiguous parcels. This configuration is not only environmentally extensive but also operationally inefficient, increasing land take, infrastructure complexity, construction impacts and long-term harm compared with a more compact arrangement delivering equivalent capacity closer to the grid connection point.

In the context of a Development Consent Order, where compulsory acquisition powers are sought, the justification for assembling land on this scale and over this distance is especially important. The application does not appear to provide clear evidence that more compact alternatives were fully tested or reasonably discounted.

In addition, the claimed public benefits are uncertain in both scale and durability. Generation forecasts appear optimistic relative to both typical UK performance and local comparators, while long-term operation depends on future equipment replacement cycles and operational assumptions that have not been fully specified or assessed. The Examination is therefore asked to weigh permanent or effectively irreversible land-use change against benefits whose magnitude and longevity remain only partially evidenced.

Across a wide range of topic areas, including alternatives, environmental baseline, safety, transport, ecology, cultural heritage, deliverability and secured mitigation, there is a consistent pattern of incomplete assessment or reliance on information deferred to post-consent stages, rather than being robustly examined through this Examination.

The application appears to rely on general policy support for renewable energy to carry significant evidential gaps, rather than demonstrating through scheme-specific analysis that the proposal is necessary, proportionate and appropriately sited.

National policy recognises the importance of renewable energy, but it does not mean that any scheme should be approved regardless of its impacts. Decisions must still be based on adequate evidence, a proper assessment of alternatives, and confidence that impacts can be acceptably managed and that the mitigation will be secured and deliverable.

On the information currently before the Examination, it has not yet been demonstrated that this proposal represents the least harmful and proportionate means of delivering the stated need in this location.

We therefore respectfully ask that the proposal be judged on the strength of its evidence.

Ultimately, the communities affected will live with the consequences of this decision for decades, and they seek assurance that those consequences have been fully understood and justified. Thank you for your time. Stop East Park Energy stands ready to assist the Examining Authority throughout the Examination.

Wednesday, 18 March 2026

Issue Specific Hearing 1: draft Development Consent Order

Good morning. My name is Andy Pike; I speak as a resident of Hail Weston and as a nominated spokesperson on behalf of Stop East Park Energy on the adequacy of the draft Development Consent Order as the legal mechanism securing the scheme assessed in the Environmental Statement.

Our principal concern is that many of the environmental effects assessed in the Environmental Statement rely on mitigation measures, operational controls or design assumptions that are not secured through clear, enforceable Requirements in the Order itself.

In several critical areas, essential detail is deferred to future plans, approvals or management documents without defining the standards those documents must meet, the outcomes they must achieve, or the criteria against which they will be judged, nor the consequences if those outcomes are not delivered.

For a project that would operate for decades and exercise compulsory acquisition powers over extensive land, that lack of detail materially reduces confidence that impacts will be acceptably controlled in practice.

The Examination is therefore being asked to rely on mitigation that is described but not yet secured within the legally binding instrument that would authorise the development.

By way of brief examples:

- Requirement 18 – Decommissioning and Restoration

  This defers the decommissioning plan until the end of the project life and secures neither funding, restoration standards, nor independent verification. The Examination is therefore asked to assume successful restoration without a secured funding mechanism, defined performance criteria, and without assurance that the land can be returned to its current condition after decades of industrial use.

- Requirement 10 – Battery Safety Management Plan

  The proposed BESS is a substantial industrial installation with well-recognised fire and environmental risks. The Requirement relies primarily on submission of a future management plan, without specifying the analyses required or the safety outcomes to be achieved. There is no explicit requirement for quantified risk assessment, thermal runaway modelling, toxic plume analysis, defined safety distances, or enforceable design parameters for containment, fire

response or pollution control. Statements of Common Ground with emergency services, if in place, do not substitute for binding provisions in the Order itself and cannot compel future operators to maintain equivalent standards.

- Work No. 4 – Grid Connection

  This authorises a 400 kV transmission connection capable of bidirectional operation without defining the operational envelope. If import from the transmission network to charge the battery is possible, that would represent a materially different scheme from a solar-led export project. It is not clear that this scenario has been constrained or fully assessed or that the Order would prevent it from occurring in practice.

Taken together, these matters raise serious questions as to whether the draft Order provides sufficient safeguards for affected communities.

There is a broader point of principle.

A Development Consent Order authorises infrastructure for several decades and may be implemented by parties other than those currently promoting it. Consented projects are frequently transferred, refinanced or sold once permission is secured, and may ultimately be constructed and operated by entities with no involvement in the Examination. In those circumstances, the Order itself becomes the governing framework for construction and operation.

The commercial value of a consent can be influenced by the extent of obligations and controls it contains. A lightly conditioned Order is inherently more attractive to investors and purchasers than one that imposes detailed enforceable safeguards.

Despite having had ample opportunity to reflect recent DCO precedent, the Applicant has not proposed detailed Requirements in several key areas. Instead, essential matters are deferred to future plans or approvals that will not be subject to the same level of scrutiny as this Examination.

Many affected residents will understandably not have the legal expertise to scrutinise the drafting of a statutory instrument. Yet it is that drafting, not the narrative of the Environmental Statement, that will ultimately govern the development.

If safeguards are not secured in the Order itself, they may simply not exist in practice, particularly if the project is transferred to a different entity after consent. In effect, the Examination is being asked to assess impacts on the basis of mitigation that is not yet embedded in the legal framework that would authorise the development and may never be tested again in a public forum. The Examination is therefore asked to consider whether the present drafting reflects the needs of long-term public protection, or primarily the commercial flexibility of the Applicant.

DCO precedents discussion

While the Applicant may rely on previous DCO precedents, precedent does not constrain this Examination from requiring more robust safeguards where justified by the scale, duration and context of the proposed development. Each application must be determined on its own merits. The Examining Authority therefore retains full discretion to recommend Requirements and financial security provisions that better protect the land and communities affected by this project.

Importantly, Requirements in several cited DCO precedents appear to contain materially greater specificity and enforceability than those currently proposed in the draft Order, securing defined standards, outcomes and mechanisms rather than relying primarily on future approvals. I would therefore respectfully ask that the Examining Authority examine closely the substance and level of detail within the precedent Requirements cited by the Applicant, including the context in which they were applied and whether they provide protections equivalent to those necessary in this case.

Wednesday, 18 March 2026

Issue Specific Hearing 2

AGENDA ITEM 3

The use of Best and Most Versatile land

National policy recognises BMV land as a finite national resource whose loss should be avoided where possible and minimised where unavoidable. Development on such land is not prohibited, but it requires clear evidence that its use is necessary and that lower-conflict alternatives are not reasonably available.

On the Applicant's own evidence, a substantial proportion of the Order Limits comprises Grades 2 and 3a land. This is therefore not a peripheral effect but a defining feature of the scheme.

The key question for the Examination is not whether BMV land is present, but whether its extensive use has been shown to be the least harmful practicable option, and whether the land assembly has demonstrably sought to minimise the inclusion of BMV land rather than simply reflecting availability or convenience.

The site selection process appears to have been driven primarily by proximity to grid connection capacity and land availability, with limited evidence of a systematic strategy to minimise impacts on higher-quality agricultural land. It is not clear from the application material that lower-grade land within feasible connection distance was comprehensively identified, compared and discounted on transparent planning grounds.

This issue is particularly important where compulsory acquisition powers are sought. Such powers exist to enable land assembly where voluntary agreement cannot be reached. If lower-quality land was available but more difficult to acquire, the Examination may wish to understand whether its use was considered as an alternative to assembling extensive areas of BMV land.

The dispersed configuration of the scheme also raises questions. Development spread across a wide area increases land take and infrastructure requirements compared with a more compact arrangement closer to the grid connection point and may therefore increase the extent of BMV land affected beyond what is technically necessary.

Where development would result in the long-term industrialisation of a nationally important agricultural resource, confidence is required that the outcome reflects necessity rather than convenience or opportunity or the constraints of assembling participating landholdings.

To assist the Examination, I would respectfully invite the Examining Authority to seek clarification from the Applicant on three specific matters.

- Whether the Applicant can identify any specific areas of predominantly lower-grade agricultural land within technically feasible connection distance that were examined and rejected, together with the reasons for their exclusion.
- What analysis demonstrates that inclusion of extensive BMV land is no more than reasonably necessary in circumstances where lower-quality land may not have been voluntarily available but compulsory acquisition powers are sought.
- What documentary evidence demonstrates how agricultural land quality was weighed against other site-selection factors in concluding that this location represents the least harmful practicable option.

In essence, the Examination is being asked to determine not simply whether Best and Most Versatile land is affected, but whether its extensive loss has been demonstrated to be genuinely unavoidable.

National policy recognises such land as a finite national resource. Removal from agricultural use on this scale and for this duration represents a substantial impact that may not be fully reversible in practice, even where restoration is proposed.

The critical issue is therefore necessity. If the use of high-quality agricultural land results primarily from site selection choices, land availability or scheme optimisation rather than a demonstrable lack of reasonable alternatives, then the policy expectation to avoid such land where possible may not be satisfied.

Where compulsory acquisition powers are sought, the threshold of justification is particularly high. Those powers exist to enable land assembly in the public interest, not simply to facilitate development on land that happens to be available.

Stop East Park Energy therefore respectfully invites the Examining Authority to consider whether the evidence before it demonstrates that the scale of impact on Best and Most Versatile land is necessary, proportionate and unavoidable, or whether it reflects a site selection outcome that could reasonably have been different.

AGENDA ITEM 4

The effects of food production and soil quality

The land affected by the proposal is capable of producing high and reliable agricultural yields. Its productivity derives fundamentally from the quality of its soils. Best and Most Versatile land is defined not simply by location but by soil characteristics including: depth, structure, drainage and fertility, all of which having developed over long periods and cannot readily be recreated once disturbed.

Removal of such land from conventional agriculture for approximately forty years represents a generational land-use change rather than a temporary interruption. The Examination is therefore being asked to consider not only immediate impacts but the long-term implications for agricultural productivity and food production capacity.

Large-scale solar development involves extensive ground and subsurface intervention across a wide area. These include piled foundations, underground cabling, trenches, access tracks, and substantial infrastructure associated with substations and battery storage facilities. Such interventions alter the soil profile and physical condition of the land for many decades and, in some locations, on a permanent basis.

Driven or bored piles penetrate soil horizons and may extend into underlying strata. Cable trenches disturb soil structure and drainage patterns. Hardstanding and foundations associated with electrical infrastructure represent concentrated areas of long-term disturbance. In combination, these works can alter water movement, aeration and root penetration even where the surface appears restored.

Compaction from heavy machinery, mixing of soil horizons and loss of organic matter can reduce permeability, impair drainage and diminish fertility. These effects may accumulate gradually and may not become apparent immediately and can manifest over time.

Even with good practice, full recovery to pre-disturbance condition cannot be assumed where soils remain altered for several decades. The key issue is therefore not simply short-term disturbance, but whether the agricultural capability of the land will be preserved in the long term.

This is particularly important for high-quality agricultural land. If soil function is degraded, the land may no longer meet the criteria that currently classify it as Best and Most Versatile, with corresponding implications for food production.

Confidence in long-term outcomes depends on robust baseline data, effective protection measures and sustained monitoring. Without these, deterioration may occur gradually and only become apparent when recovery is difficult or impossible.

The application assumes that land will be restored at the end of the operational period. However, restoration after several decades cannot be treated as certain. Ownership,

financial responsibility and regulatory context may change over time, and the physical condition of the land at that point cannot be assumed to match current baseline conditions. The Examination is therefore being asked to consider the possibility that land returned at decommissioning may not retain its present agricultural capability.

I would therefore respectfully invite clarification on several points:

- whether all piled foundations, underground cables and buried structures will be removed in full at decommissioning;
- if any elements are to remain, what assessment has been undertaken of their implications for future agricultural use and soil function;
- what evidence demonstrates that soil structure and fertility will be maintained at a level consistent with current productivity over the full operational period;
- how soil quality will be monitored and what mechanisms will trigger remedial action if degradation occurs; and
- how the success of soil reinstatement will be verified, both after construction and at decommissioning.

Where development affects a finite agricultural resource, the decisive issue is not whether restoration is proposed, but whether the evidence demonstrates that the land's productive capacity will in fact be preserved, because once soil function is materially degraded, it cannot realistically be recreated by condition or commitment.

AGENDA ITEM 5

Construction traffic routes

On the Applicant's own evidence, construction would generate over ten thousand two-way HGV movements, excluding workforce travel, abnormal loads and ancillary deliveries. Peak flows are likely to be substantially higher than programme averages, particularly where concurrent work fronts operate across multiple site areas.

The surrounding highway network is predominantly rural and not designed for sustained heavy goods vehicle movements. The principal corridors, including the B645, B660 and B661, are narrow single-carriageway roads with constrained visibility, limited overtaking opportunities and close proximity to residential and village environments.

These roads serve multiple functions: local access, agricultural operations and vulnerable road users. They do not possess the geometric standard or structural resilience associated with primary HGV distributor routes.

Independent statutory evidence indicates that traffic levels of this magnitude would ordinarily require detailed assessment of junction performance at the A1/B645 interface. No robust peak-period modelling has been presented to demonstrate that congestion and diversion risks can be safely managed under realistic worst-case conditions.

The Environmental Statement relies on a defined routing strategy to conclude that impacts will be acceptable. However, the draft Development Consent Order does not secure that routing strategy through binding provisions capable of ensuring that the assessed scenario is the scenario delivered in practice.

Requirement 8 requires submission of a Construction Traffic Management Plan, but it does not specify mandatory routes, prohibited routes or a fixed routing hierarchy. Nor does it require a No-Go or No-Through-Routing Schedule for sensitive village roads.

The Requirement merely requires a plan to be submitted "in substantial accordance" with the outline CTMP. That formulation allows significant flexibility and does not ensure that the routing scenario assessed in the Environmental Statement will be delivered in practice once construction is underway or where programme, cost or logistical pressures incentivise alternative routing.

In a rural network with limited redundancy, congestion at key junctions would make diversion to alternative roads reasonably foreseeable. Evidence before the Examination indicates that local villages could be exposed to traffic not assessed within the baseline or mitigation strategy.

The Requirement also provides no explicit mechanism to prevent workforce vehicles, vans or subcontractors from using minor roads outside the assessed link network or to enforce compliance if such use occurs on a systematic or cumulative basis.

The Examination may therefore wish to consider whether the routing assumptions underpinning the Environmental Statement are sufficiently secured to protect communities over the full construction period, including peak activity phases and unplanned disruption.

I respectfully invite the Examining Authority to seek clarification from the Applicant on:

- whether the construction routes relied upon in the Environmental Statement will be secured as binding Requirements in the Order, including explicit prohibitions on alternative routes and enforceable obligations on all contractors and subcontractors
- What safeguards would prevent diversion through nearby villages not assessed within the baseline if congestion or disruption occurs on the primary corridor and what enforcement mechanisms would apply if such diversion nevertheless occurs
- Why does the draft Order not include an explicit No-Through-Routing Schedule for sensitive settlements if avoidance of those areas forms part of the assessed mitigation and a material component of the impact assessment

Where rural communities are affected, prevention through enforceable routing controls is far more effective than mitigation after impacts occur.

Stop East Park Energy therefore respectfully submits that the adequacy of construction traffic routes depends not only on their identification but on whether they are secured in the Order itself with sufficient precision to ensure that the assessed impacts represent the maximum reasonably foreseeable impacts.

Addendum / Additional discussion

The applicant has stated that all construction traffic will pass via the A1/B645 to the main site entrance at site D. The B645 is a rural road, with an environmental weight limit of 18T, the road is already in a state of disrepair with multiple potholes on the stretch from the A1/B645 junction through Hail Weston, adding over 10,000 HGV movements to this route without any consideration for road quality or how that amount of traffic may further impact the road surface is flawed. The route is also difficult taking you through known traffic black spots especially through the S-bend configuration at the narrow Piggs Hill.

The fact that the Applicant's transport consultant had only traversed the route from the A1/B645 East and West to Site D on the morning of this Issue Specific Hearing is telling; it demonstrates that desk-based modelling has formed the basis of all

construction traffic planning for the scheme with complete disregard for actual real-life road conditions.

More alarming were comments made that an unquantified and unassessed amount of construction traffic may need to traverse through Great Staughton to access Sites C, B and A whilst the Applicant is constructing internal site roads and the main access at SA16.

The access at SA16 is on the single carriageway B645; this main site access will therefore require an unspecified duration of temporary traffic measures as creating the access will need to cross an established drainage ditch (probably containing water voles) which will require strengthening. There is currently no assessment of the duration of such works in the Applicant's submitted plans which will significantly impact traffic for the local community and businesses, likely putting pressure on alternative access routes as people seek to avoid the disruption (likely via an 8-mile diversionary route from Great Staughton via the Kimbolton Road/B661 junction towards Perry and the Perry Road/A1 junction route).

The road through Great Staughton is narrow, contains traffic-calming measures and is limited to 20mph; it is simply not designed for HGV traffic. Any traffic that needs to take this route on entering Great Staughton will need to traverse a bridge over the River Kym, travel west through "The Highway" and then likely branch left onto "Causeway", through the most historic and narrowest part of the village road network, passing Great Staughton Primary School, crossing a further bridge over the River Kym, onto "The Town" passing the Grade I listed St Andrew's Church and multiple grade II and residential buildings to access Zantra Park / Great Staughton road, (which in places is single track <5m wide), to access sites C, B and A.

Alternatively, construction traffic would need to take a 5-mile diversionary route continuing from "The Highway" on the B645 "Green Lane" / "Kimbolton Road" through Stonely before turning left (South) onto the B660 Park Lane / Kimbolton Road for 2.5 miles towards Pertenhall/Keysoe and the Site accesses proposed at SA01 and SA02 near the intersection of Kimbolton Road/Great Staughton Road. Any construction or workforce / project traffic taking these routes will pose a significant safety risk to residents and businesses. This highlights the need for explicit no-go / no-through traffic routing schedules to ensure that the Applicant only uses the internal site road infrastructure it states will be developed for the project.

Critically, the issues described above are not isolated concerns about road condition alone but go to the deliverability of the entire construction access strategy. The Applicant's approach relies heavily on the assumption that all traffic will use the specified primary route and that alternative routes will not be used in practice. However, where a single constrained corridor carries the majority of construction traffic, any disruption, whether due to congestion, accidents, roadworks, structural

deterioration, or access construction activities, makes diversion onto surrounding village roads not merely possible but reasonably foreseeable.

The local network provides several such diversion pathways, including routes through Great Staughton, Perry, Kimbolton and associated minor roads, none of which are designed to accommodate sustained HGV flows. The detailed description already provided demonstrates that these routes pass through historic village centres, constrained carriageways, traffic-calmed environments, sensitive receptors including schools, and structures such as narrow bridges that may be particularly vulnerable to heavy traffic.

Yet there is no clear evidence that these diversion scenarios have been assessed quantitatively, nor that enforceable measures are in place to prevent them from occurring. In the absence of explicit No-Go or No-Through routing provisions secured within the Order itself, reliance on voluntary compliance or future management plans provides limited assurance that assessed traffic patterns will be maintained over a prolonged construction period.

Furthermore, the condition and geometry of the B645, including existing defects, narrow sections and known congestion points such as Piggs Hill, raise legitimate concerns about whether it can function as a dependable primary HGV corridor without generating knock-on effects across the wider network. If the route becomes partially obstructed or degraded, pressure on alternative roads would increase immediately.

The need to construct the main access at SA16 on a live single-carriageway road introduces an additional period of heightened vulnerability, during which temporary traffic management could significantly reduce capacity and increase the likelihood of diversion. The absence of a defined programme, duration or mitigation strategy for these works' compounds uncertainty.

Taken together, these factors suggest that the construction traffic strategy depends on a chain of assumptions regarding road condition, capacity, compliance and uninterrupted operation, any one of which may fail in practice. Where that occurs, the impacts on surrounding communities could be substantially greater than those assessed.

In these circumstances, robust, enforceable routing controls secured within the Order are not merely desirable but necessary to ensure that the Environmental Statement's conclusions remain valid throughout the construction period.

AGENDA ITEM 6

Traffic management

Traffic management concerns how vehicle movements are controlled, including timing, volume, coordination with local conditions and safeguards for affected communities.

Even where routes are appropriate, impacts arise from the intensity and timing of movements. Concentrated arrivals and departures can create congestion, safety risks and loss of amenity, particularly on constrained rural roads with limited capacity and alternative routes.

The Transport Assessment relies heavily on programme-wide averages. However, peak workforce numbers exceed eight hundred personnel, indicating the potential for substantial clustering of vehicle movements at certain times of day.

These movements are likely to coincide with existing commuter flows and local activity patterns on roads with limited capacity to absorb surges in traffic.

Requirement 17 of the draft DCO restricts construction working hours, but it does not control traffic outside those hours. Vehicles may travel to or from the site before work begins or after it ends, including early-morning arrivals and late departures when communities are most sensitive to disturbance.

Nor does the Requirement provide any protection for sensitive periods such as school start and finish times or other peak community activity periods despite predictable interaction with construction traffic flows.

Requirement 8 requires submission of a CTMP but does not secure key operational controls. It does not mandate:

- limits on daily or peak vehicle movements
- defined delivery time windows
- workforce travel management measures
- off-site holding areas to prevent queuing
- coordination with local traffic conditions
- enforcement mechanisms for non-compliance

The Requirement also allows plans to be approved for individual phases, which may fragment oversight and obscure the cumulative intensity of activity across the wider project.

Construction duration assumptions are likewise not secured. If works extend beyond the anticipated programme, communities could experience prolonged disruption without any binding review mechanism. Evidence from comparable projects indicates

that unmanaged logistics can lead to queuing, informal parking, out-of-hours movements and sustained disturbance even where plans exist.

The absence of enforceable operational controls therefore raises a fundamental question: whether the impacts assessed in the Environmental Statement can realistically be delivered within acceptable limits.

I respectfully invite the Examining Authority to consider whether the proposed framework provides sufficient certainty. In particular, the Examination may wish to seek clarification from the Applicant on:

- What specific measures will prevent peak workforce arrivals and departures from clustering on the local road network, and where are those measures secured as binding Requirements rather than discretionary elements of a future plan
- What real-time monitoring mechanisms will be implemented to ensure compliance with agreed routes and traffic controls, and will the resulting data be made available to the relevant authorities and affected communities
- Will the Applicant commit to enforceable restrictions on construction traffic during school travel periods and peak commute hours, and if not, what evidence demonstrates that such protections are unnecessary in this location

Without clear operational controls, even appropriate routes may not prevent significant disruption.

Time-based HGV embargoes during school and peak periods are a routine mitigation in major infrastructure projects where construction traffic interacts with sensitive communities. The absence of any equivalent safeguard in this draft Order is therefore notable.

Stop East Park Energy therefore respectfully submits that effective traffic management requires enforceable safeguards capable of operating throughout the construction period, not merely outline proposals to be developed after consent.

AGENDA ITEM 7

Cumulative transport impacts from other projects

(Examination time pressure did not allow for verbal submission)

This development cannot be assessed in isolation from the wider construction activity already occurring or reasonably foreseeable in the area. Multiple solar farms, energy storage facilities and major infrastructure schemes are consented, under construction or progressing through planning, many of which rely on the same strategic and rural road network.

The relevant issue for the Examination is therefore the combined effect of these projects on shared transport corridors, junctions and communities over time.

While the Applicant has provided a cumulative assessment, the key question is not whether such an assessment exists, but whether it adequately evaluates the interaction of construction traffic from multiple schemes using the same routes and junctions.

On the material before the Examination, the assessment appears limited in scope, largely qualitative, and heavily dependent on distance thresholds to determine which projects are included, rather than on demonstrable interaction with shared transport infrastructure.

Established NSIP practice is that cumulative transport assessment should be pathway-led – based on actual traffic routing, junction use and construction timing – not confined by geographic boundaries. Projects outside a nominal radius may still use the same A-roads, rural corridors and junctions to access the strategic network.

Conversely, projects within a defined radius may have little interaction if they use different routes. Distance screening alone is therefore not a reliable method for identifying cumulative transport effects.

The area already functions as a transport corridor linking local roads to the A1, A428 and wider strategic network. Where multiple construction programmes overlap, heavy goods vehicle movements may coincide on the same constrained rural routes and key junctions, particularly the A1/B645 interface and associated feeder roads.

In such circumstances, impacts may be materially greater than those predicted for any single scheme. Communities may experience sustained high traffic levels, congestion, safety risks and disturbance over an extended period rather than a defined construction phase.

Crucially, the Environmental Statement does not appear to provide scenario-based testing of overlapping construction programmes or combined peak traffic flows on

shared routes. Without such analysis, conclusions of “no significant cumulative effect” cannot be independently verified by the Examination.

Recent DCO examinations have frequently required additional cumulative transport analysis where multiple projects rely on common corridors or where construction timing may overlap. The absence of equivalent analysis here raises a material question as to whether the assessment provides a sufficiently reliable basis for decision-making.

I respectfully invite the Examining Authority to seek clarification from the Applicant on two key matters.

- First: What evidence demonstrates that all operational, consented and reasonably foreseeable developments likely to use the same transport corridors and junctions have been identified on a pathway-led basis, rather than primarily through distance screening?
- Second: If construction periods overlap with other major projects using the same routes or labour market, what robust modelling demonstrates that the combined traffic volumes, congestion and safety impacts would remain acceptable?

Cumulative transport effects are often decisive in rural infrastructure cases. Individual schemes may appear manageable alone, yet the combined traffic burden may exceed what local roads and communities can safely accommodate.

Without a robust cumulative transport assessment, there is a real risk that the overall impact on the highway network and affected settlements is materially underestimated.

Stop East Park Energy therefore respectfully submits that a comprehensive, pathway-based evaluation of cumulative transport effects is necessary to ensure that the Examination has a reliable evidential basis before any decision is made.

Stop East Park Energy

East Park Energy – EN010141

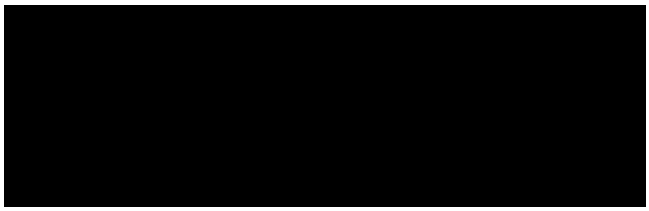
Drone Footage of Proposed Development Site – File 1

Please find attached drone footage of the proposed development

Stop East Park Energy

East Park Energy – EN010141

Drone Footage of Proposed Development Site – File 2



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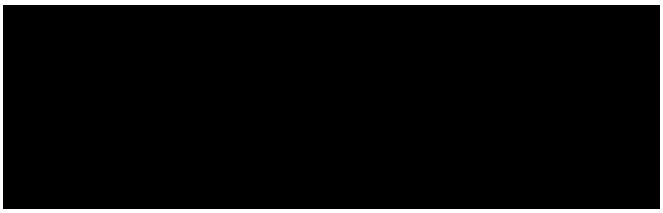
Stop East Park Energy

East Park Energy – EN010141

Drone Footage of Proposed Development Site – File 3



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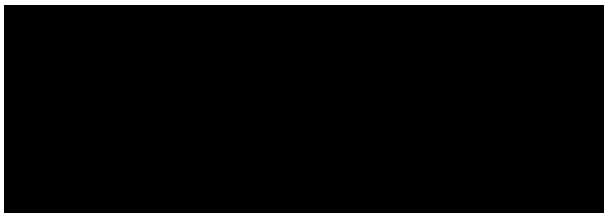
Stop East Park Energy

East Park Energy – EN010141

Drone Footage of Proposed Development Site – File 4



Please find attached drone footage of the proposed development

Stop East Park Energy

Notes on Preliminary Meeting, Open Floor Hearing, Issues Specific Hearing 1 and Issue Specific Hearing 2 with respect to East Park Energy Solar and Battery Energy Storage System - DCO Application EN010141

19 March 2026

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A community that participated in the statutory consultation process in good faith with the expectation that their evidence would meaningfully influence the scheme, yet the proposal before the Examination suggests that this input has had limited effect.

I speak today to assist the Examination by highlighting matters that affect confidence in the evidence before it. Our submission does not oppose renewable energy in principle. Rather, we submit that this particular proposal has not been demonstrated to be appropriately sited, proportionate, or supported by sufficiently robust environmental evidence.

At the heart of our concerns is a fundamental issue of decision-stage confidence. The Environmental Statement leaves multiple critical matters unresolved, and the Draft Development Consent Order does not secure the mitigation on which the assessment depends. Taken together, these factors raise legitimate questions as to whether the likely significant effects of the development have been fully identified, assessed and controlled to the standard required for a project of this scale and duration.

At its core, this case turns on a simple question. Not whether renewable energy is needed, but whether this project, in this location, on this evidence, is justified?

Most notably, the scheme would result in the long-term loss of a nationally significant area of Best and Most Versatile agricultural land. National policy does not prohibit development on such land, but it does expect a transparent approach demonstrating that lower-conflict alternatives have been properly considered and that the chosen site represents the least harmful practicable option. It is not clear that such a demonstration has yet been provided.

The proposed development is also unusually dispersed, extending across approximately twelve and a half kilometres as a patchwork of non-contiguous parcels. This configuration is not only environmentally extensive but also operationally inefficient, increasing land take, infrastructure complexity, construction impacts and long-term harm compared with a more compact arrangement delivering equivalent capacity closer to the grid connection point.

In the context of a Development Consent Order, where compulsory acquisition powers are sought, the justification for assembling land on this scale and over this distance is especially important. The application does not appear to provide clear evidence that more compact alternatives were fully tested or reasonably discounted.

In addition, the claimed public benefits are uncertain in both scale and durability. Generation forecasts appear optimistic relative to both typical UK performance and local comparators, while long-term operation depends on future equipment replacement cycles and operational assumptions that have not been fully specified or assessed. The Examination is therefore asked to weigh permanent or effectively irreversible land-use change against benefits whose magnitude and longevity remain only partially evidenced.

Across a wide range of topic areas, including alternatives, environmental baseline, safety, transport, ecology, cultural heritage, deliverability and secured mitigation, there is a consistent pattern of incomplete assessment or reliance on information deferred to post-consent stages, rather than being robustly examined through this Examination.

The application appears to rely on general policy support for renewable energy to carry significant evidential gaps, rather than demonstrating through scheme-specific analysis that the proposal is necessary, proportionate and appropriately sited.

National policy recognises the importance of renewable energy, but it does not mean that any scheme should be approved regardless of its impacts. Decisions must still be based on adequate evidence, a proper assessment of alternatives, and confidence that impacts can be acceptably managed and that the mitigation will be secured and deliverable

On the information currently before the Examination, it has not yet been demonstrated that this proposal represents the least harmful and proportionate means of delivering the stated need in this location.

We therefore respectfully ask that the proposal be judged on the strength of its evidence.

Ultimately, the communities affected will live with the consequences of this decision for decades, and they seek assurance that those consequences have been fully understood and justified. Thank you for your time. Stop East Park Energy stands ready to assist the Examining Authority throughout the Examination.

Wednesday, 18 March 2026

Issue Specific Hearing 1

Draft Development Consent Order

Issue Specific Hearing 1: draft Development Consent Order

Wednesday, 18 March 2026

Good morning. My name is Andy Pike; I speak as a resident of Hail Weston and as a nominated spokesperson on behalf of Stop East Park Energy on the adequacy of the draft Development Consent Order as the legal mechanism securing the scheme assessed in the Environmental Statement.

Our principal concern is that many of the environmental effects assessed in the Environmental Statement rely on mitigation measures, operational controls or design assumptions that are not secured through clear, enforceable Requirements in the Order itself.

In several critical areas, essential detail is deferred to future plans, approvals or management documents without defining the standards those documents must meet, the outcomes they must achieve, or the criteria against which they will be judged, nor the consequences if those outcomes are not delivered

For a project that would operate for decades and exercise compulsory acquisition powers over extensive land, that lack of detail materially reduces confidence that impacts will be acceptably controlled in practice.

The Examination is therefore being asked to rely on mitigation that is described but not yet secured within the legally binding instrument that would authorise the development..

By way of brief examples:

- Requirement 18 - Decommissioning and Restoration

  This defers the decommissioning plan until the end of the project life and secures neither funding, restoration standards, nor independent verification. The Examination is therefore asked to assume successful restoration without a secured funding mechanism, defined performance criteria, and without assurance that the land can be returned to its current condition after decades of industrial use.

- Requirement 10 - Battery Safety Management Plan

  The proposed BESS is a substantial industrial installation with well-recognised fire and environmental risks. The Requirement relies primarily on submission of a future management plan, without specifying the analyses required or the safety outcomes to be achieved. There is no explicit requirement for quantified

risk assessment, thermal runaway modelling, toxic plume analysis, defined safety distances, or enforceable design parameters for containment, fire response or pollution control. Statements of Common Ground with emergency services, if in place, do not substitute for binding provisions in the Order itself and cannot compel future operators to maintain equivalent standards.

- Work No. 4 – Grid Connection

  This authorises a 400 kV transmission connection capable of bidirectional operation without defining the operational envelope. If import from the transmission network to charge the battery is possible, that would represent a materially different scheme from a solar-led export project. It is not clear that this scenario has been constrained or fully assessed or that the Order would prevent it from occurring in practice.

Taken together, these matters raise serious questions as to whether the draft Order provides sufficient safeguards for affected communities.

There is a broader point of principle.

A Development Consent Order authorises infrastructure for several decades and may be implemented by parties other than those currently promoting it. Consented projects are frequently transferred, refinanced or sold once permission is secured, and may ultimately be constructed and operated by entities with no involvement in the Examination. In those circumstances, the Order itself becomes the governing framework for construction and operation.

The commercial value of a consent can be influenced by the extent of obligations and controls it contains. A lightly conditioned Order is inherently more attractive to investors and purchasers than one that imposes detailed enforceable safeguards.

Despite having had ample opportunity to reflect recent DCO precedent, the Applicant has not proposed detailed Requirements in several key areas. Instead, essential matters are deferred to future plans or approvals that will not be subject to the same level of scrutiny as this Examination.

Many affected residents will understandably not have the legal expertise to scrutinise the drafting of a statutory instrument. Yet it is that drafting, not the narrative of the Environmental Statement, that will ultimately govern the development.

If safeguards are not secured in the Order itself, they may simply not exist in practice, particularly if the project is transferred to a different entity after consent. In effect, the Examination is being asked to assess impacts on the basis of mitigation that is not yet embedded in the legal framework that would authorise the development and may never be tested again in a public forum. The Examination is therefore asked to consider whether the present drafting reflects the needs of long-term public protection, or primarily the commercial flexibility of the Applicant.

DCO Precedents discussion

While the Applicant may rely on previous DCO precedents, precedent does not constrain this Examination from requiring more robust safeguards where justified by the scale, duration and context of the proposed development. Each application must be determined on its own merits. The Examining Authority therefore retains full discretion to recommend Requirements and financial security provisions that better protect the land and communities affected by this project.

Importantly, Requirements in several cited DCO precedents appear to contain materially greater specificity and enforceability than those currently proposed in the draft Order, securing defined standards, outcomes and mechanisms rather than relying primarily on future approvals. I would therefore respectfully ask that the Examining Authority examine closely the substance and level of detail within the precedent Requirements cited by the Applicant, including the context in which they were applied and whether they provide protections equivalent to those necessary in this case.

Wednesday, 18 March 2026

Issue Specific Hearing 2

AGENDA ITEM 3

The Use of Best and Most Versatile Land

National policy recognises BMV land as a finite national resource whose loss should be avoided where possible and minimised where unavoidable. Development on such land is not prohibited, but it requires clear evidence that its use is necessary and that lower-conflict alternatives are not reasonably available.

On the Applicant's own evidence, a substantial proportion of the Order Limits comprises Grades 2 and 3a land. This is therefore not a peripheral effect but a defining feature of the scheme.

The key question for the Examination is not whether BMV land is present, but whether its extensive use has been shown to be the least harmful practicable option, and whether the land assembly has demonstrably sought to minimise the inclusion of BMV land rather than simply reflecting availability or convenience.

The site selection process appears to have been driven primarily by proximity to grid connection capacity and land availability, with limited evidence of a systematic strategy to minimise impacts on higher-quality agricultural land. It is not clear from the application material that lower-grade land within feasible connection distance was comprehensively identified, compared and discounted on transparent planning grounds.

This issue is particularly important where compulsory acquisition powers are sought. Such powers exist to enable land assembly where voluntary agreement cannot be reached. If lower-quality land was available but more difficult to acquire, the Examination may wish to understand whether its use was considered as an alternative to assembling extensive areas of BMV land.

The dispersed configuration of the scheme also raises questions. Development spread across a wide area increases land take and infrastructure requirements compared with a more compact arrangement closer to the grid connection point and may therefore increase the extent of BMV land affected beyond what is technically necessary.

Where development would result in the long-term industrialisation of a nationally important agricultural resource, confidence is required that the outcome reflects necessity rather than convenience or opportunity or the constraints of assembling participating landholdings.

To assist the Examination, I would respectfully invite the Examining Authority to seek clarification from the Applicant on three specific matters.

- Whether the Applicant can identify any specific areas of predominantly lower-grade agricultural land within technically feasible connection distance that were examined and rejected, together with the reasons for their exclusion.
- What analysis demonstrates that inclusion of extensive BMV land is no more than reasonably necessary in circumstances where lower-quality land may not have been voluntarily available but compulsory acquisition powers are sought.
- What documentary evidence demonstrates how agricultural land quality was weighed against other site-selection factors in concluding that this location represents the least harmful practicable option.

In essence, the Examination is being asked to determine not simply whether Best and Most Versatile land is affected, but whether its extensive loss has been demonstrated to be genuinely unavoidable.

National policy recognises such land as a finite national resource. Removal from agricultural use on this scale and for this duration represents a substantial impact that may not be fully reversible in practice, even where restoration is proposed.

The critical issue is therefore necessity. If the use of high-quality agricultural land results primarily from site selection choices, land availability or scheme optimisation rather than a demonstrable lack of reasonable alternatives, then the policy expectation to avoid such land where possible may not be satisfied.

Where compulsory acquisition powers are sought, the threshold of justification is particularly high. Those powers exist to enable land assembly in the public interest, not simply to facilitate development on land that happens to be available.

Stop East Park Energy therefore respectfully invites the Examining Authority to consider whether the evidence before it demonstrates that the scale of impact on Best and Most Versatile land is necessary, proportionate and unavoidable, or whether it reflects a site selection outcome that could reasonably have been different.

AGENDA ITEM 4

The effects of Food Production and Soil Quality

The land affected by the proposal is capable of producing high and reliable agricultural yields. Its productivity derives fundamentally from the quality of its soils. Best and Most Versatile land is defined not simply by location but by soil characteristics including: depth, structure, drainage and fertility, all of which having developed over long periods and cannot readily be recreated once disturbed.

Removal of such land from conventional agriculture for approximately forty years represents a generational land-use change rather than a temporary interruption. The Examination is therefore being asked to consider not only immediate impacts but the long-term implications for agricultural productivity and food production capacity.

Large-scale solar development involves extensive ground and subsurface intervention across a wide area. These include piled foundations, underground cabling, trenches, access tracks, and substantial infrastructure associated with substations and battery storage facilities. Such interventions alter the soil profile and physical condition of the land for many decades and, in some locations, on a permanent basis.

Driven or bored piles penetrate soil horizons and may extend into underlying strata. Cable trenches disturb soil structure and drainage patterns. Hardstanding and foundations associated with electrical infrastructure represent concentrated areas of long-term disturbance. In combination, these works can alter water movement, aeration and root penetration even where the surface appears restored.

Compaction from heavy machinery, mixing of soil horizons and loss of organic matter can reduce permeability, impair drainage and diminish fertility. These effects may accumulate gradually and may not become apparent immediately and can manifest over time.

Even with good practice, full recovery to pre-disturbance condition cannot be assumed where soils remain altered for several decades. The key issue is therefore not simply short-term disturbance, but whether the agricultural capability of the land will be preserved in the long term.

This is particularly important for high-quality agricultural land. If soil function is degraded, the land may no longer meet the criteria that currently classify it as Best and Most Versatile, with corresponding implications for food production.

Confidence in long-term outcomes depends on robust baseline data, effective protection measures and sustained monitoring. Without these, deterioration may occur gradually and only become apparent when recovery is difficult or impossible.

The application assumes that land will be restored at the end of the operational period. However, restoration after several decades cannot be treated as certain. Ownership, financial responsibility and regulatory context may change over time, and the physical

condition of the land at that point cannot be assumed to match current baseline conditions. The Examination is therefore being asked to consider the possibility that land returned at decommissioning may not retain its present agricultural capability.

I would therefore respectfully invite clarification on several points:

- whether all piled foundations, underground cables and buried structures will be removed in full at decommissioning;
- if any elements are to remain, what assessment has been undertaken of their implications for future agricultural use and soil function;
- what evidence demonstrates that soil structure and fertility will be maintained at a level consistent with current productivity over the full operational period;
- how soil quality will be monitored and what mechanisms will trigger remedial action if degradation occurs; and
- how the success of soil reinstatement will be verified, both after construction and at decommissioning.

Where development affects a finite agricultural resource, the decisive issue is not whether restoration is proposed, but whether the evidence demonstrates that the land's productive capacity will in fact be preserved, because once soil function is materially degraded, it cannot realistically be recreated by condition or commitment.

AGENDA ITEM 5

Construction traffic routes

On the Applicant's own evidence, construction would generate over ten thousand two-way HGV movements, excluding workforce travel, abnormal loads and ancillary deliveries. Peak flows are likely to be substantially higher than programme averages, particularly where concurrent work fronts operate across multiple site areas.

The surrounding highway network is predominantly rural and not designed for sustained heavy goods vehicle movements. The principal corridors, including the B645, B660 and B661, are narrow single-carriageway roads with constrained visibility, limited overtaking opportunities and close proximity to residential and village environments.

These roads serve multiple functions: local access, agricultural operations and vulnerable road users. They do not possess the geometric standard or structural resilience associated with primary HGV distributor routes.

Independent statutory evidence indicates that traffic levels of this magnitude would ordinarily require detailed assessment of junction performance at the A1/B645 interface. No robust peak-period modelling has been presented to demonstrate that congestion and diversion risks can be safely managed under realistic worst-case conditions.

The Environmental Statement relies on a defined routing strategy to conclude that impacts will be acceptable. However, the draft Development Consent Order does not secure that routing strategy through binding provisions capable of ensuring that the assessed scenario is the scenario delivered in practice.

Requirement 8 requires submission of a Construction Traffic Management Plan, but it does not specify mandatory routes, prohibited routes or a fixed routing hierarchy. Nor does it require a No-Go or No-Through-Routing Schedule for sensitive village roads.

The Requirement merely requires a plan to be submitted "in substantial accordance" with the outline CTMP. That formulation allows significant flexibility and does not ensure that the routing scenario assessed in the Environmental Statement will be delivered in practice once construction is underway or where programme, cost or logistical pressures incentivise alternative routing.

In a rural network with limited redundancy, congestion at key junctions would make diversion to alternative roads reasonably foreseeable. Evidence before the Examination indicates that villages local villages could be exposed to traffic not assessed within the baseline or mitigation strategy

The Requirement also provides no explicit mechanism to prevent workforce vehicles, vans or subcontractors from using minor roads outside the assessed link network or to enforce compliance if such use occurs on a systematic or cumulative basis.

The Examination may therefore wish to consider whether the routing assumptions underpinning the Environmental Statement are sufficiently secured to protect communities over the full construction period, including peak activity phases and unplanned disruption..

I respectfully invite the Examining Authority to seek clarification from the Applicant on:

- whether the construction routes relied upon in the Environmental Statement will be secured as binding Requirements in the Order, including explicit prohibitions on alternative routes and enforceable obligations on all contractors and subcontractors?
- What safeguards would prevent diversion through nearby villages not assessed within the baseline if congestion or disruption occurs on the primary corridor and what enforcement mechanisms would apply if such diversion nevertheless occurs
- Why does the draft Order not include an explicit No-Through-Routing Schedule for sensitive settlements if avoidance of those areas forms part of the assessed mitigation and a material component of the impact assessment

Where rural communities are affected, prevention through enforceable routing controls is far more effective than mitigation after impacts occur.

Stop East Park Energy therefore respectfully submits that the adequacy of construction traffic routes depends not only on their identification but on whether they are secured in the Order itself with sufficient precision to ensure that the assessed impacts represent the maximum reasonably foreseeable impacts..

Addendum / Additional discussion

The applicant has stated that all construction traffic will pass via the A1/B645 to the main site entrance at site D. The B645 is a rural road, with an environmental weight limit o 18T, the road is already in a state of disrepair with multiple potholes on the stretch form the A1/B645 junction through Hail Weston, adding over 10,000 HGV movements to this route without any consideration for road quality or how that amount of traffic may further impact the road surface is flawed. The route is also difficult taking your through known traffic black spots especially through the s-bend configuration at the narrow Piggs Hill.

The fact that the Applicants transport consultant had only traversed the route from the A1/B645 East and West to Site D on the morning of this Issue Specific Hearing is telling, it demonstrates that desk-based modelling has formed the basis of all construction traffic planning for the scheme with complete disregard for actual real-life road conditions.

More alarming were comments made that an unquantified and unassessed amount of construction traffic may need to traverse through Great Staughton to access Sites C,

B and A whilst the Applicant is constructing internal site roads and the main access at SA16.

The access at SA16 is on the single carriageway B645, this main site access will therefore require an unspecified duration of temporary traffic measures as creating the access will need to cross an established drainage ditch (probably containing water voles) which will require strengthening. There is currently no assessment of the duration of such works in the Applicants submitted plans which will significantly impact traffic for the local community and businesses, likely putting pressure on alternative access routes as people seek to avoid the disruption (likely via an 8-mile diversionary route from Great Staughton via the Kimbolton Road/B661 junction towards Perry and the Perry Road/A1 junction route).

The road through Great Staughton is narrow, contains traffic calming measures and is limited to 20mph, it is simply not designed for HGV traffic. Any traffic that needs to take this route on entering Great Staughton will need to traverse a bridge over the River Kym, travel west through “The Highway” and then likely branch left onto "Causeway", through the most historic and narrowest part of the village road network, passing Great Staughton Primary School, crossing a further bridge over the River Kym, onto "The Town" passing the Grade I listed St Andrews church and multiple grade II and residential buildings to access Zantra Park / Great Staughton road, (which in places is single track <5m wide), to access sites C, B and A.

Alternatively, construction traffic would need to take a 5-mile diversionary route continuing from “The Highway” on the B645 “Green Lane” / “Kimbolton Road” through Stonely before turning left (South) onto the B660 Park Lane / Kimbolton Road for 2.5 miles towards Pertenhall/Keysoe and the Site accesses proposed at SA01 and SA02 near the intersection of Kimbolton Road/Great Staughton Road. Any construction or workforce / project traffic taking these routes will pose a significant safety risk to residents and businesses. This highlights the need for explicit no-go / no-through traffic routing schedules to ensure that the Applicant only uses the internal site road infrastructure they state will be developed for the project.

Critically, the issues described above are not isolated concerns about road condition alone but go to the deliverability of the entire construction access strategy. The Applicant’s approach relies heavily on the assumption that all traffic will use the specified primary route and that alternative routes will not be used in practice. However, where a single constrained corridor carries the majority of construction traffic, any disruption, whether due to congestion, accidents, roadworks, structural deterioration, or access construction activities, makes diversion onto surrounding village roads not merely possible but reasonably foreseeable.

The local network provides several such diversion pathways, including routes through Great Staughton, Perry, Kimbolton and associated minor roads, none of which are designed to accommodate sustained HGV flows. The detailed description already provided demonstrates that these routes pass through historic village centres,

constrained carriageways, traffic-calmed environments, sensitive receptors including schools, and structures such as narrow bridges that may be particularly vulnerable to heavy traffic.

Yet there is no clear evidence that these diversion scenarios have been assessed quantitatively, nor that enforceable measures are in place to prevent them from occurring. In the absence of explicit No-Go or No-Through routing provisions secured within the Order itself, reliance on voluntary compliance or future management plans provides limited assurance that assessed traffic patterns will be maintained over a prolonged construction period.

Furthermore, the condition and geometry of the B645, including existing defects, narrow sections and known congestion points such as Piggs Hill, raise legitimate concerns about whether it can function as a dependable primary HGV corridor without generating knock-on effects across the wider network. If the route becomes partially obstructed or degraded, pressure on alternative roads would increase immediately.

The need to construct the main access at SA16 on a live single-carriageway road introduces an additional period of heightened vulnerability, during which temporary traffic management could significantly reduce capacity and increase the likelihood of diversion. The absence of a defined programme, duration or mitigation strategy for these works' compounds uncertainty.

Taken together, these factors suggest that the construction traffic strategy depends on a chain of assumptions, regarding road condition, capacity, compliance and uninterrupted operation, any one of which may fail in practice. Where that occurs, the impacts on surrounding communities could be substantially greater than those assessed.

In these circumstances, robust, enforceable routing controls secured within the Order are not merely desirable but necessary to ensure that the Environmental Statement's conclusions remain valid throughout the construction period.

AGENDA ITEM 6 Traffic Management

Traffic management concerns how vehicle movements are controlled, including timing, volume, coordination with local conditions and safeguards for affected communities.

Even where routes are appropriate, impacts arise from the intensity and timing of movements. Concentrated arrivals and departures can create congestion, safety risks and loss of amenity, particularly on constrained rural roads with limited capacity and alternative routes.

The Transport Assessment relies heavily on programme-wide averages. However, peak workforce numbers exceed eight hundred personnel, indicating the potential for substantial clustering of vehicle movements at certain times of day

These movements are likely to coincide with existing commuter flows and local activity patterns on roads with limited capacity to absorb surges in traffic.

Requirement 17 of the draft DCO restricts construction working hours, but it does not control traffic outside those hours. Vehicles may travel to or from the site before work begins or after it ends, including early-morning arrivals and late departures when communities are most sensitive to disturbance

Nor does the Requirement provide any protection for sensitive periods such as school start and finish times or other peak community activity periods despite predictable interaction with construction traffic flows

Requirement 8 requires submission of a CTMP but does not secure key operational controls. It does not mandate:

• limits on daily or peak vehicle movements

• defined delivery time windows

• workforce travel management measures

• off-site holding areas to prevent queuing

• coordination with local traffic conditions

• enforcement mechanisms for non-compliance

The Requirement also allows plans to be approved for individual phases, which may fragment oversight and obscure the cumulative intensity of activity across the wider project

Construction duration assumptions are likewise not secured. If works extend beyond the anticipated programme, communities could experience prolonged disruption without any binding review mechanism. Evidence from comparable projects indicates that unmanaged logistics can lead to queuing, informal parking, out-of-hours movements and sustained disturbance even where plans exist

The absence of enforceable operational controls therefore raises a fundamental question: whether the impacts assessed in the Environmental Statement can realistically be delivered within acceptable limits

I respectfully invite the Examining Authority to consider whether the proposed framework provides sufficient certainty. In particular, the Examination may wish to seek clarification from the Applicant on:

• What specific measures will prevent peak workforce arrivals and departures from clustering on the local road network, and where are those measures secured as binding Requirements rather than discretionary elements of a future plan?

• What real-time monitoring mechanisms will be implemented to ensure compliance with agreed routes and traffic controls, and will the resulting data be made available to the relevant authorities and affected communities

• Will the Applicant commit to enforceable restrictions on construction traffic during school travel periods and peak commute hours, and if not, what evidence demonstrates that such protections are unnecessary in this location?

Without clear operational controls, even appropriate routes may not prevent significant disruption.

Time-based HGV embargoes during school and peak periods are a routine mitigation in major infrastructure projects where construction traffic interacts with sensitive communities. The absence of any equivalent safeguard in this draft Order is therefore notable

Stop East Park Energy therefore respectfully submits that effective traffic management requires enforceable safeguards capable of operating throughout the construction period, not merely outline proposals to be developed after consent.

AGENDA ITEM 7 Cumulative transport impacts from other projects

(Examination time pressure did not allow for verbal submission)

This development cannot be assessed in isolation from the wider construction activity already occurring or reasonably foreseeable in the area. Multiple solar farms, energy storage facilities and major infrastructure schemes are consented, under construction or progressing through planning, many of which rely on the same strategic and rural road network.

The relevant issue for the Examination is therefore the combined effect of these projects on shared transport corridors, junctions and communities over time.

While the Applicant has provided a cumulative assessment, the key question is not whether such an assessment exists, but whether it adequately evaluates the interaction of construction traffic from multiple schemes using the same routes and junctions.

On the material before the Examination, the assessment appears limited in scope, largely qualitative, and heavily dependent on distance thresholds to determine which projects are included, rather than on demonstrable interaction with shared transport infrastructure.

Established NSIP practice is that cumulative transport assessment should be pathway-led — based on actual traffic routing, junction use and construction timing — not confined by geographic boundaries. Projects outside a nominal radius may still use the same A-roads, rural corridors and junctions to access the strategic network.

Conversely, projects within a defined radius may have little interaction if they use different routes. Distance screening alone is therefore not a reliable method for identifying cumulative transport effects.

The area already functions as a transport corridor linking local roads to the A1, A428 and wider strategic network. Where multiple construction programmes overlap, heavy goods vehicle movements may coincide on the same constrained rural routes and key junctions, particularly the A1/B645 interface and associated feeder roads.

In such circumstances, impacts may be materially greater than those predicted for any single scheme. Communities may experience sustained high traffic levels, congestion, safety risks and disturbance over an extended period rather than a defined construction phase.

Crucially, the Environmental Statement does not appear to provide scenario-based testing of overlapping construction programmes or combined peak traffic flows on shared routes. Without such analysis, conclusions of “no significant cumulative effect” cannot be independently verified by the Examination.

Recent DCO examinations have frequently required additional cumulative transport analysis where multiple projects rely on common corridors or where construction

timing may overlap. The absence of equivalent analysis here raises a material question as to whether the assessment provides a sufficiently reliable basis for decision-making.

I respectfully invite the Examining Authority to seek clarification from the Applicant on two key matters.

First: What evidence demonstrates that all operational, consented and reasonably foreseeable developments likely to use the same transport corridors and junctions have been identified on a pathway-led basis, rather than primarily through distance screening?

Second: If construction periods overlap with other major projects using the same routes or labour market, what robust modelling demonstrates that the combined traffic volumes, congestion and safety impacts would remain acceptable?

Cumulative transport effects are often decisive in rural infrastructure cases. Individual schemes may appear manageable alone, yet the combined traffic burden may exceed what local roads and communities can safely accommodate.

Without a robust cumulative transport assessment, there is a real risk that the overall impact on the highway network and affected settlements is materially underestimated.

Stop East Park Energy therefore respectfully submits that a comprehensive, pathway-based evaluation of cumulative transport effects is necessary to ensure that the Examination has a reliable evidential basis before any decision is made.