Summary of Written Representation

East Park Energy DCO (EN010141)
Interested Party: [redacted]

This Written Representation supplements my Relevant Representation and provides further evidence and analysis regarding the East Park Energy proposal. It does not oppose renewable energy in principle. Rather, it addresses whether this specific scheme has been demonstrated to be appropriately sited, proportionate in its impacts, and capable of being delivered with the level of certainty, control and evidential robustness required of a Nationally Significant Infrastructure Project (NSIP).

Across multiple topic areas, the submission identifies a consistent theme: the Application presents a framework that appears complete at a high level but, on closer examination, lacks the detailed evidence, secured controls and internal consistency necessary for the Examining Authority (ExA) to reach a fully informed and robust recommendation.

1. National benefit and proportionality

The Applicant places substantial reliance on the scheme's installed generating capacity and its classification as an NSIP as indicators of national benefit. However, the evidence presented does not adequately demonstrate the scale, reliability or timing of actual electricity delivery.

The submission highlights that:

- solar generation is inherently seasonal and does not align with peak winter demand;
- installed capacity does not equate to continuous output; and
- the contribution of the scheme to national electricity demand is modest when considered in context.

These factors are relevant to the planning balance required under national policy, which must consider whether the scale of environmental and land-use effects is proportionate to the level of public benefit delivered.

2. Site selection and agricultural land

The Proposed Development would result in the long-term use of a substantial area of Best and Most Versatile (BMV) agricultural land.

The submission identifies:

- a constrained and project-defined site selection process;
- absence of a robust comparative assessment of reasonable alternatives; and
- insufficient evidence demonstrating that the use of BMV land is necessary or unavoidable.

In the absence of such evidence, there is no adequate basis to conclude that the permanent or long-duration loss of productive agricultural land is justified.

3. Construction traffic and local impacts

The construction phase would give rise to significant traffic impacts, particularly affecting Hail Weston and surrounding rural routes.

Key concerns include:

- concentration of HGV movements on unsuitable rural roads;
- insufficiently secured routing controls; and
- reliance on outline mitigation without clear, enforceable mechanisms.

The submission emphasises that impacts of this nature are not temporary in any meaningful sense, given the duration and intensity of the construction programme, and that they require firm control through the Development Consent Order (DCO).

4. Battery Energy Storage System (BESS) risk and uncertainty

The Application includes a large-scale Battery Energy Storage System (BESS), which introduces a distinct category of risk.

The submission identifies:

- limited project-specific evidence on major-accident risk;
- absence of a fully developed and secured safety framework;
- uncertainty regarding the operational model, including charging regimes; and
- reliance on outline management plans to be developed post-consent.

These issues are material not only to safety but also to the fundamental character and carbon performance of the scheme. If the BESS is capable of importing electricity from the grid, including from non-renewable sources, it may operate as a market-responsive balancing asset rather than as storage ancillary to on-site renewable generation. This would represent a materially different development from that assessed and has direct implications for the weight that can be given to the scheme's claimed public benefits.

5. Greenhouse Gas Assessment reliability

The Applicant's Greenhouse Gas (GHG) Assessment is a central component of the claimed public benefit. However, the submission identifies concerns regarding its reliability, transparency and internal consistency.

In particular:

- potential inaccuracy in calculation of operational worker travel over the scheme's lifetime;
- the relationship between inputs and outputs is not transparently explained;
- key assumptions are not supported by sensitivity testing; and
- there is limited use of supplier-specific or project-specific data.

These issues indicate that the assessment is highly sensitive to assumption choice but does not transparently explore that sensitivity. As a result, the claimed carbon benefit cannot be treated as a robust or verifiable figure and should be afforded reduced weight unless corrected.

6. Residential amenity and long-term effects

The Proposed Development would introduce industrial-scale infrastructure into a rural environment characterised by low baseline noise, limited lighting and high tranquillity.

The submission identifies:

- insufficient assessment of long-term noise and lighting impacts;
- absence of clearly defined thresholds and enforceable limits; and
- lack of secured monitoring, reporting and remediation mechanisms.

Given the multi-decade duration of the project, the absence of robust and enforceable controls creates uncertainty regarding long-term living conditions for nearby residents.

7. Decommissioning, restoration and financial security

The Application does not provide a complete or enforceable framework to guarantee:

- full decommissioning of all infrastructure (including below-ground works);
- restoration of land to its current agricultural condition; and
- long-term funding security.

The Funding Statement does not identify a ring-fenced or secured financial mechanism capable of ensuring delivery over the operational life of the scheme.

This is a critical issue given the duration of the project. The effects of the development will extend well beyond the lifetime of current stakeholders, and without secured mechanisms there is a risk that restoration obligations may not be fulfilled in full.

The existence of precedent in other solar NSIP schemes where such mechanisms have not been secured does not provide protection to communities or reduce the level of risk in this case. Each application must be assessed on its own merits, and the Examining Authority has the ability to require safeguards where a material and foreseeable risk has been identified.

8. Draft DCO and reliance on post-consent approvals

A central concern throughout the submission is the extent to which the Application defers key matters to post-consent stages.

These include:

- detailed design;
- environmental mitigation;
- operational controls;

- safety systems; and
- restoration measures.

While the DCO includes Requirements, many are framed at a high level and rely on subsequent approval of outline plans. This approach transfers a significant degree of control from the examination phase, where it is subject to scrutiny, to the post-consent phase, where it is not.

The effect is to introduce uncertainty as to the form and impact of the development that would actually be delivered.

9. Deliverability and implementation risk

The submission also identifies a lack of evidence regarding:

- contractor competence;
- safety performance;
- implementation of mitigation; and
- delivery capability across the full scope of the scheme.

Given the scale and technical complexity of the development, this absence of evidence contributes to uncertainty regarding whether the scheme can be delivered to the standard assumed in the Application.

10. Overarching concern: reliance on policy without project-specific evidence

The submission notes that the Application relies heavily on general policy support for renewable energy and net-zero objectives.

While such policy support is clear, it does not remove the requirement for:

- a fully evidenced case;
- a proportionate design; and
- clearly secured and enforceable mitigation.

The structure and presentation of the Application give the appearance of compliance with NSIP requirements. However, a substantial proportion of the detail necessary to assess and control the scheme is not provided at the point of examination.

In a number of areas, including construction traffic, BESS operation, lifecycle carbon and decommissioning, the practical implications of the scheme are not clearly presented in the Application and instead require reconstruction or detailed interrogation by third parties. This is not consistent with the Applicant's responsibility to provide a complete, transparent and intelligible assessment at the point of examination.

11. Planning Balance and Conclusion

The submission concludes that the key issue is not the presence of harm in any single topic area, but the absence of a sufficiently evidenced and reliable case that those harms are:

- necessary;
- proportionate; and
- capable of being effectively controlled.

At the same time:

- the claimed benefits, particularly in relation to carbon, are uncertain and not robustly quantified; and
- key aspects of the scheme remain undefined or unsecured.

In planning terms, this uncertainty is not neutral. It weighs against the proposal, particularly where the principal public benefit relied upon is itself subject to question.

Accordingly, the submission requests that the Examining Authority:

- give significant weight to local and cumulative impacts;
- attach reduced weight to unverified or uncertain benefits;
- require further evidence and clarification where material gaps exist; and
- ensure that all mitigation and control measures are secured through enforceable provisions within the DCO.

Absent such evidence and controls, the Application does not provide a sufficient basis for the grant of development consent under the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The submission therefore concludes that, on the evidence currently before the Examination, the statutory tests for development consent are not met and consent should be refused.

WRITTEN REPRESENTATION

East Park Energy DCO (EN010141)

Interested Party: [redacted]

1. Introduction and status of this submission

This Written Representation is submitted in support of my Relevant Representation (RR-060) dated 13 January 2026. It does not repeat that submission but provides additional evidence, clarification and local context specific to Hail Weston and the surrounding rural network, residential receptors and agricultural land.

I am a resident of Hail Weston, one of the communities directly affected by the Proposed Development. I am not opposed to renewable energy or decarbonisation; my concern is whether this particular scheme has been lawfully sited, properly assessed and safely designed, and whether it can be delivered with the safeguards expected of a Nationally Significant Infrastructure Project (NSIP).

I also bring professional experience of the NSIP/DCO process, having previously worked for a developer and led a strategic development team responsible for securing development consent for a nationally significant energy infrastructure project. In addition, I have [redacted] years' experience in the infrastructure and utilities sector, including the planning, development, financing, operation and management of major international water and wastewater systems, energy generation facilities, and UK energy-from-waste infrastructure assets, including in senior executive and board-level roles. I am therefore familiar with the evidential standards, risk controls and enforceable delivery mechanisms typically required for projects of this scale and complexity.

I note that a number of the wider issues raised in this submission are also addressed in other representations before the Examination. My focus here is on the way in which those matters arise specifically in relation to Hail Weston, its residents, its local road network and its surrounding agricultural landscape. Where relevant, I also draw attention to broader evidential deficiencies which, although not confined to Hail Weston alone, materially affect the weight that can properly be given to the Applicant's case on safety, proportionality, carbon benefit and deliverability.

2. Material national benefit, energy efficiency and proportionality of the proposal

The Applicant relies heavily on the proposition that the Proposed Development is a "Nationally Significant Infrastructure Project" by virtue of exceeding the 50 MW statutory threshold. While this classification determines the consenting regime, it does not establish that the proposal delivers a materially significant national benefit sufficient to outweigh its site-specific impacts.

The 50 MW threshold used to define nationally significant generating stations is expressed in terms of installed (nameplate) capacity. It is not calibrated to reflect the quantity of electricity actually delivered to the grid over time, or the land required to produce that output. That distinction is material.

2.1 Misalignment between installed capacity and real-world contribution

A central difficulty with the Applicant's case is that it relies on installed capacity as a proxy for national significance, when that metric does not reflect actual system contribution or land-use efficiency.

In practice, there is a material difference in output efficiency between different forms of renewable generation. A ground-mounted solar scheme of up to 400 MW in the UK, operating at a load factor of approximately 9.5–11%, would be expected to generate in the order of 330–385 GWh per year (the Applicant forecasts 433 GWh). By comparison, an onshore wind scheme of materially lower installed capacity, operating at a typical UK load factor of approximately 25–30%, could generate a comparable annual output.

The consequence is that materially different levels of installed capacity, and associated land use, may be required to deliver a comparable annual energy yield depending on the technology deployed. This has direct implications for land-use efficiency and environmental impact.

This is not an argument against solar generation as a technology, but one of proportionality in its deployment.

Where a scheme requires a very large area of predominantly productive agricultural land in order to deliver a relatively modest quantity of annual energy, the planning question is not answered by reference to installed capacity alone. It is whether that outcome represents an efficient and justified use of land.

This comparison does not seek to prioritise one renewable technology over another, but to illustrate that installed capacity alone is not a reliable indicator of either energy contribution or land-use efficiency. The distinction between installed (nameplate) capacity and actual energy output is reflected in the approach taken in EN-1, which requires consideration of the characteristics, timing and contribution of different forms of generation when assessing need and the planning balance. The planning question is not whether solar generation is supported in principle, but whether a development of this scale represents an efficient and proportionate use of land having regard to its real-world output and impacts. Where a development requires a substantial and continuous land take to deliver a given level of output, that characteristic is itself a material consideration in the planning balance.

2.2 Land-use efficiency and planning relevance

In this case, the Proposed Development would occupy a substantial area of Best and Most Versatile agricultural land for a multi-decade period. When assessed against the level of energy likely to be delivered annually, that land-use requirement is not self-evidently proportionate.

The Applicant's reliance on headline capacity figures risks overstating the practical significance of the scheme. A project may be "nationally significant" in procedural terms while making a relatively limited contribution in system terms.

The correct approach is therefore to assess energy delivered per unit of impact, not installed capacity in isolation.

Viewed in that way, the proposal raises a clear and legitimate question: whether a development of this scale, with its associated environmental, agricultural and community impacts, represents an efficient and justified means of contributing to national energy objectives.

That question becomes sharper when the scale of land take is considered by reference to alternative renewable technologies capable of delivering a broadly comparable annual output. Using the Applicant's own solar output assumptions, a 400 MW ground-mounted solar scheme operating at a load factor of approximately 9.8–11% would be expected to generate in the order of approximately 330–385 GWh per year. By contrast, applying published UK onshore wind load factors of approximately 25.7% on average, a broadly comparable annual output could in principle be achieved by an onshore wind scheme of roughly 145–170 MW.

On an illustrative basis, that level of output might be delivered by approximately 24-28 modern onshore wind turbines of around 6 MW each. The total permanent occupied footprint of such a scheme would be materially smaller than the Order Limits of the Proposed Development. Using published estimates that 45 GW of onshore wind would directly occupy around 5,000 hectares, equivalent to approximately 0.11 hectares per MW, a 145–170 MW onshore wind scheme would occupy only around 16–19 hectares on a direct footprint basis, or approximately 2–3% of the proposed 773 hectares of the Proposed Development.

Even that direct footprint is likely to overstate the practical loss of agricultural utility, because onshore wind does not generally sterilise the full site area in the same way as a contiguous solar array. Government appraisal material recognises that agricultural activity can continue at the base of turbines and around their spacing, subject to layout and construction methods being designed to minimise soil and hydrology disturbance. A site-specific planning example from an arable farm similarly records a turbine hardstanding footprint of approximately 0.17 hectares, with the surrounding land remaining in arable use. In practical terms, this means that the vast majority of land within a wind farm envelope can typically remain in agricultural production, whereas a ground-mounted solar scheme of the type proposed would occupy and effectively remove a substantially larger proportion of the land from conventional farming use for the duration of the development. This distinction is particularly material in the context of Best and Most Versatile agricultural land, where the preservation of agricultural function is itself a recognised planning objective, and where long-term displacement of that function requires clear and specific justification.

It is recognised that onshore wind and solar development are subject to different planning, landscape and locational considerations, and that wind development may give rise to its own environmental effects, including visual and cumulative impacts. The comparison drawn here is not intended to suggest that onshore wind represents a direct or preferable alternative at this specific location, and it does not suggest that the two technologies are interchangeable in all respects.

This comparison does not depend on assumptions about turbine spacing or red-line site area, which for wind schemes can extend across a wide envelope. The relevant distinction for present purposes is the extent of land that is physically occupied and effectively removed from agricultural use. In that respect, the evidence consistently indicates that the direct and

permanent footprint of wind development is a small fraction of its overall site envelope, whereas a ground-mounted solar scheme of the type proposed results in a substantially greater proportion of the land being taken out of conventional agricultural production for the duration of the consent.

The Applicant may also contend that site selection is constrained by grid availability or project-specific considerations. However, that does not address the underlying planning question. The issue is not whether this particular site is convenient or available for development, but whether the resulting scale of land take, particularly of Best and Most Versatile agricultural land, is justified when measured against the level of energy delivered and the range of alternative configurations in which renewable generation can, in principle, be deployed.

The difference is therefore not marginal but structural and goes directly to the question of proportionality: one approach largely preserves agricultural function across the site, while the other results in its long-term displacement.

The relevance of the comparison is not to advocate a different technology, but to demonstrate that the relationship between energy output and land take is not fixed. In those circumstances, the planning question is whether a scheme of this scale, on this land, represents a proportionate and efficient use of that resource when assessed against its real-world output and impacts.

2.3 Carbon efficiency, system value and temporal mismatch

A related concern is that the Applicant's case implicitly treats all megawatts of low-carbon generation as equivalent in climate and system terms, when that is not the case in practice.

The carbon benefit of a generating station is not determined solely by its installed capacity, but by:

- the volume of electricity actually delivered over time;
- the carbon intensity of the generation it displaces;
- the temporal alignment between generation and demand; and
- the extent to which output is curtailed, exported or requires balancing by other plant.

These factors are particularly relevant for intermittent generation.

Solar output is concentrated in daylight hours and in summer months, when electricity demand, and often system carbon intensity, is lower. Conversely, output is significantly reduced during winter periods, when demand is highest and when dispatchable generation plays a greater role in maintaining system stability.

As a result, a unit of installed solar capacity does not necessarily deliver a unit of carbon abatement equivalent to dispatchable generation or to generation that aligns more closely with periods of system demand. It also does not necessarily reduce the need for complementary infrastructure, including storage, grid reinforcement or backup generation.

While national policy recognises the role of a diverse and balanced energy mix, including intermittent generation supported by storage and network infrastructure, that does not remove the need to assess the contribution of an individual development on its own merits. The existence of system-level balancing mechanisms does not convert intermittent output into dispatchable

supply, and it does not negate the relevance of temporal mismatch when assessing the scale, timing and value of electricity generation in the planning balance.

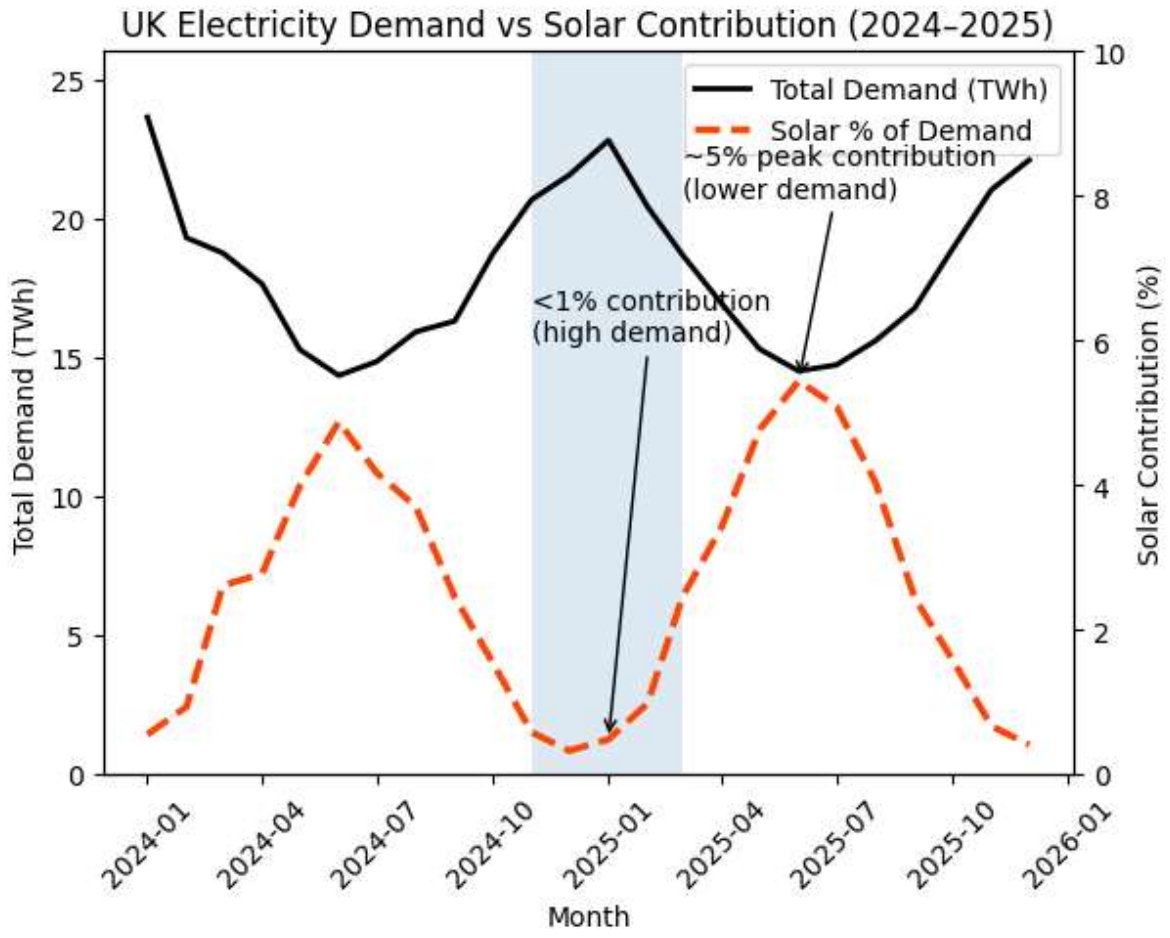
The temporal relationship between solar generation and system demand is clearly demonstrated by UK monthly electricity data published by Department for Energy Security and Net Zero.

In 2024, solar generation peaked at approximately 0.70 TWh in June, coinciding with one of the lowest monthly demand levels of the year (approximately 14.36 TWh). By contrast, in December, when electricity demand rose to approximately 21.58 TWh, solar generation fell to approximately 0.07 TWh, representing around one-tenth of peak summer output.

This pattern is consistent across both 2024 and 2025 data. Solar generation is strongly concentrated in late spring and summer months, whereas system demand peaks during winter. The result is a structural and predictable mismatch between when electricity is generated and when it is most needed.

Figure 2.3 presents monthly UK electricity demand (TWh) alongside the percentage contribution of solar generation across 2024–2025. Shaded areas indicate winter periods (November–February), when electricity demand is highest.

Figure 2.3 – UK electricity demand and solar generation contribution by month (2024–2025)



Source: Department for Energy Security and Net Zero (DESNZ) electricity statistics and National Grid ESO system data, 2024–2025 (monthly aggregated values).

The data show that solar generation contributes less than approximately 1% of total demand during peak winter months, when system demand is highest. By contrast, peak contribution (approximately 5%) occurs during summer months when overall electricity demand is materially lower.

This illustrates both the limited scale of solar contribution and its structural misalignment with periods of system need.

The significance of this is that installed solar capacity does not translate into equivalent system value or carbon abatement during peak demand periods. A substantial proportion of annual output is delivered at times of lower demand, and often lower marginal carbon intensity, while contribution during winter peak periods is minimal.

In planning terms, the relevant question is not simply whether electricity is generated, but whether it is generated at times of system need. Installed capacity is therefore not a reliable proxy for system value or carbon benefit.

2.4 Implications for carbon efficiency and land use

This has two important implications for the planning balance.

First, the carbon benefit of the Proposed Development cannot be inferred from installed capacity alone. It depends on when and how electricity is generated and used within the wider system. In the absence of detailed evidence on seasonal output, curtailment, export constraints and system integration, the claimed carbon benefit should be treated with caution. That caution is reinforced by weaknesses in the Applicant's own greenhouse gas assessment, addressed further below, which reduce confidence that the claimed lifecycle carbon benefit has been robustly or conservatively calculated. This reinforces the distinction identified in Sections 2.1 and 2.2: that the planning assessment must consider not only the quantity of energy generated, but the efficiency with which that energy is delivered in relation to land use and environmental impact.

Second, the question of carbon efficiency per unit of land take becomes relevant. Where a development requires a very large area of productive agricultural land to deliver a relatively modest quantity of energy, much of it at times of lower system need, it is legitimate to ask whether the same or greater carbon benefit could be achieved through:

- deployment on lower-conflict land;
- distributed generation on built surfaces; or
- alternative technologies or configurations that better align with system demand.

This is not to suggest that solar generation lacks value. It is to recognise that, at scale, the efficiency with which carbon benefit is delivered, including land-use efficiency, is a material planning consideration.

2.5 Greenhouse Gas Assessment reliability and likely underestimation

The Applicant's Greenhouse Gas (GHG) Assessment does not provide a sufficiently robust, transparent or internally consistent evidential basis on which to assign substantial weight to the claimed carbon benefit of the Proposed Development.

Within the Applicant's GHG Assessment (APP-116), specifically Table 16 – GHG emissions over the lifetime of the Scheme, emissions during the operational phase for "travel of workers to site" are reported as only 0.4 tCO_2e over the lifetime of the Scheme.

Given that the Applicant identifies approximately 20 operational staff, and indicates that these may travel up to a 100 km round trip to site, this figure appears unrealistically low when considered against the scale of activity implied. On an order-of-magnitude basis, such assumptions would be expected to generate a substantial volume of vehicle kilometres over a 40-year operational period. The reported emissions figure is not explained in a way that allows it to be reconciled with those inputs.

This submission does not seek to substitute a definitive recalculation. However, in the absence of a clear explanation of how the figure has been derived, including trip frequency, emission factors and aggregation methodology, the assessment cannot be verified as internally consistent.

In these circumstances, the Examining Authority is respectfully invited to require the Applicant to provide a transparent reconciliation of this calculation, including:

• confirmation of the input assumptions used;

• the frequency and basis of worker travel;

• the emission factors applied; and

• the calculation methodology used to derive the reported total.

Unless and until that reconciliation is provided, there is no reliable basis on which to place weight on this component of the assessment.

By way of illustration, if 20 operational staff were to undertake a 100 km round trip on a regular working basis, this would equate to approximately 440,000 km of travel per year and around 17.6 million km over a 40-year operational life. Applying standard UK Government greenhouse gas conversion factors to that scale of activity would be expected to result in emissions several orders of magnitude greater than the 0.4 tCO_2e reported. The purpose of this comparison is not to assert a substitute calculation, but to demonstrate the scale of the apparent discrepancy. This scale of activity should be understood in the context of the Applicant's wider Transport Assessment (APP-101), which provides the baseline assumptions for vehicle movements associated with the Scheme

This also raises a further evidential question as to the assumed operational model. If the reported emissions figure reflects limited site attendance, remote monitoring, or centralised off-site management, the Applicant should clearly explain the assumed location and working pattern of operational staff. That information is relevant not only to the GHG assessment, but also to the extent to which the Proposed Development would generate meaningful local employment and economic benefit.

More broadly, the GHG Assessment relies on a series of simplifying assumptions which are not supported by sufficient evidence or sensitivity testing. These include:

• use of generic or mid-point emissions factors without testing across plausible ranges;

• absence of supplier-specific embodied carbon data for key electrical components;

• treatment of sulphur hexafluoride (SF_6) emissions as negligible without quantified, project-specific evidence; and

• absence of meaningful sensitivity analysis across key assumptions such as equipment replacement cycles, supply-chain origin and future grid carbon intensity.

These features indicate that the assessment is sensitive to assumption choice, but that sensitivity is not transparently explored. It is therefore not possible to determine whether the reported emissions represent a central estimate or an optimistic scenario.

A further limitation arises from the absence of a clearly defined and evidenced operational model for the Battery Energy Storage System (BESS), as described in the Environmental Statement (APP-038), including whether, and to what extent, the system may be charged from the grid using non-renewable or mixed electricity. That uncertainty directly affects both lifecycle emissions and the claimed carbon benefit of the Scheme.

The purpose of these observations is not to assert an alternative carbon outcome, but to demonstrate that the results presented depend on assumptions that are neither fully evidenced and not transparently tested. In those circumstances, the claimed benefit cannot be treated as a fixed or reliably quantified outcome.

In planning terms, a benefit that cannot be robustly quantified, transparently derived or independently verified cannot be afforded the same weight as a benefit supported by clear and internally consistent evidence.

Accordingly, the GHG Assessment should be treated with caution. As currently presented, it does not provide a sufficiently evidenced or conservative evaluation of lifecycle emissions, and the claimed carbon benefit of the Proposed Development should be afforded reduced weight unless and until a corrected, transparent and sensitivity-tested assessment is provided.

This uncertainty is particularly material when considered alongside the extent of Best and Most Versatile agricultural land affected by the Proposed Development (see Section 5). Where the principal public benefit relied upon is both uncertain and assumption-sensitive, there is no sufficient evidential basis to conclude that the long-term loss of productive agricultural land is justified or proportionate.

2.6 Absence of demonstrated necessity

The Applicant has not demonstrated that this level of land take on predominantly Best and Most Versatile agricultural land is necessary in order to deliver the claimed benefits.

There is no clear evidence of a structured comparison with lower-grade land, alternative sites or alternative deployment models. Without such analysis, it cannot be concluded that the proposal represents the least harmful or most efficient means of achieving its stated objectives.

During Issue Specific Hearing 2, the Applicant confirmed that the identification of the preferred search area was driven principally by the availability of a grid connection at Eaton Socon, with agricultural land quality then considered within that constrained geography. This is material. It

indicates that the assessment of alternatives was effectively bounded by a single connection offer, rather than by a comparative evaluation of reasonable alternatives across a broader spatial or grid context.

During the same hearing, the Applicant also confirmed that the 15 km search radius was derived from project-specific commercial and technical viability assumptions associated with that chosen point of connection, rather than representing an externally fixed policy or engineering limit. This reinforces the need for the Examination to distinguish between constraints arising from wider system necessity and those arising from project-specific optimisation.

I also note that the Application does not include any assessment of land beyond the defined 15 km search radius, including areas within a wider 15–20 km envelope. In other nationally significant solar DCO projects, search areas of this order have been applied to identify alternative land parcels, including lower-grade (non-BMV) agricultural land.

The difference is material. A 15 km radius defines an area of approximately 706 km^2 (70,600 hectares / 174,500 acres), whereas a 20 km radius defines an area of approximately 1,257 km^2 (125,700 hectares / 310,600 acres). The exclusion of land between 15 km and 20 km therefore omits approximately 550 km^2 (55,000 hectares / 136,000 acres) of additional search area arising from the Applicant's adoption of a 15 km search radius as a project-specific technical and commercial constraint associated with the chosen grid connection point, rather than a policy-imposed or externally fixed engineering limitation that has been clearly evidenced in the Application.

By comparison, the Proposed Development itself occupies approximately 773 hectares (c.1,900 acres). The area excluded from assessment is therefore of a wholly different order of magnitude, being almost 80 times larger than the Order Limits.

The limitation of the search area to 15 km is not presented as a fixed engineering or policy constraint, but as a project-specific assumption linked to the chosen grid connection. In those circumstances, it cannot be relied upon to demonstrate that alternative sites or configurations outside that radius were not reasonably available. A constraint derived from project optimisation does not establish the absence of reasonable alternatives in planning terms.

The absence of any comparative assessment across that wider area introduces a material gap in the alternatives analysis. It means that the Examination is not provided with evidence as to whether less harmful configurations, including those avoiding extensive use of Best and Most Versatile land, could reasonably have been achieved within a modestly expanded search area.

The consequence of this constrained and untested search approach is that the use of Best and Most Versatile agricultural land within the Order Limits cannot be assumed to be necessary. Where a substantial area of higher-quality land is proposed to be taken for a multi-decade development, the planning question is not simply whether such land can be used, but whether its use has been demonstrated to be unavoidable in the context of reasonable alternatives. In the absence of a comparative assessment extending beyond the 15 km radius, there is no sufficient evidential basis for concluding that lower-grade land options, or materially less harmful configurations, were not reasonably available. This materially reduces the weight that can be given to the Applicant's site selection case and correspondingly increases the weight to be

attributed to the loss of Best and Most Versatile land in the planning balance, as addressed in Section 5 below.

2.7 Conclusion on national benefit and proportionality

The Proposed Development satisfies the statutory definition of a Nationally Significant Infrastructure Project. However, that classification is not evidence of need, efficiency or proportionality.

On the information provided:

- the actual energy contribution appears limited in national terms;
- the land take and associated impacts are substantial and long-term;
- the efficiency and necessity of the proposal have not been demonstrated;
- the Applicant's claimed lifecycle carbon benefit is subject to material uncertainty and should be treated with caution; and
- the operational role of the BESS, including the extent to which it may function as a bidirectional grid-charged storage asset, has not been clearly or transparently defined.

The relevant question is not whether the scheme is low-carbon in principle, but whether it represents an efficient and proportionate means of delivering carbon reduction when measured against the scale of land use and impact proposed.

Put simply, the scheme's scale is defined by its installed capacity, but its justification must be measured by what it actually delivers, and on that basis, the proportionality of this proposal is not made out. In particular, the evidence indicates that a substantial and continuous land take is required to deliver a comparatively modest level of annual energy output, and that alternative renewable configurations may, in principle, achieve similar output with materially lower impact on agricultural land. That relationship is central to the planning balance and is not addressed by reference to installed capacity alone.

It follows that the statutory classification of the project as an NSIP is a matter of jurisdiction rather than planning merit. The Examining Authority must be satisfied, on the evidence, that the development delivers a level of public benefit sufficient to outweigh its identified harms. On the information currently before the Examination, that conclusion is not made out.

3. Construction traffic and highway safety - localised impacts on Hail Weston

3.1 Concentration of construction traffic via the B645

The Applicant's Transport Assessment (APP-101) indicates that construction traffic will access the main site compound via the A1/B645 junction. As a consequence, traffic approaching from the strategic road network will be required to travel along the B645 past Hail Weston.

This results in a concentration of construction traffic on a single rural corridor, rather than distribution across a wider network. For Hail Weston, the B645 is not one of several affected routes, it is the unavoidable access corridor for a substantial proportion of project traffic.

Given the scale of the Proposed Development, construction activity is expected to generate a very substantial number of Heavy Goods Vehicle (HGV) movements over an extended period, likely

exceeding 10,000 two-way movements. This represents a sustained and material change in traffic conditions, not a temporary or marginal increase.

The Transport Assessment presents impacts in aggregated or averaged terms. However, the reality for Hail Weston is one of continuous exposure, with traffic flows concentrated in both spatial and temporal terms. The effects of such concentration are not fully captured by network-level analysis.

A further limitation of the Transport Assessment is its reliance on averaged traffic flows rather than assessment of peak-day and peak-hour conditions. In practice, it is peak construction activity, not averages, that determines safety risk, congestion and community impact, particularly in a rural village environment with school movements and constrained road geometry. This omission materially understates the likely real-world effects on Hail Weston.

The importance of this issue is reinforced by the Examining Authority's request at the Preliminary Meeting for further visual and explanatory material showing how construction traffic would in practice be routed and managed. That request indicates that the current evidence base is not yet sufficient to provide a clear and reliable understanding of real-world traffic effects, particularly at the local level.

3.2 Direct impact on frontage properties and road users

A defining characteristic of the B645 through Hail Weston is the presence of residential properties that front directly onto the carriageway, often with minimal separation distance and no physical buffering.

Residents at these properties are required to:

- enter and exit directly into live traffic;
- manoeuvre within constrained visibility conditions; and
- share road space with pedestrians, cyclists and agricultural vehicles.

A sustained increase in HGV movements materially alters the safety environment in several respects:

- increased risk of collision at private accesses;
- reduced ability to safely enter or leave properties;
- greater conflict between heavy vehicles and vulnerable road users; and
- elevated levels of noise and vibration experienced at close range.

These impacts are not transient. They would be experienced daily over a multi-year construction period and would fall disproportionately on a relatively small number of receptors.

This is particularly relevant in the context of school transport and pedestrian activity. The B645 corridor and surrounding network are used by school buses and for school-related movements at defined peak times. The absence of a specific School Transport Impact Assessment or secured

timing restrictions (such as delivery embargoes during school drop-off and pick-up periods) represents a further gap in the assessment of safety risk.

This is particularly relevant in the context of school transport and timed peak movements. The rural road network in and around Hail Weston and villages in proximity to the Proposed Development is used by school buses and for pupil transport serving a number of local schools, including Kimbolton School, Hinchingbrooke School, Great Staughton Primary Academy and Longsands Academy. These movements occur at defined and predictable times and involve interactions between buses, private vehicles and, in some cases, pedestrians and cyclists.

The Transport Assessment does not appear to include a specific assessment of school transport interactions, nor does it identify any secured measures to manage construction traffic during peak school travel periods. In particular, no evidence is provided of consultation with affected schools or transport providers to understand routeing, timing or sensitivity to increased HGV movements.

In the absence of such assessment, there is a foreseeable risk of conflict between construction traffic and school-related movements on constrained rural roads. This risk is not appropriately captured by averaged traffic modelling and requires targeted mitigation.

3.3 Environmental weight restriction, road condition and structural capacity

The B645 between the A1 junction and Hail Weston is subject to an environmental weight restriction of 18 tonnes. This reflects the physical limitations of the road and its unsuitability for sustained heavy vehicle use.

Notwithstanding this designation, the Proposed Development would introduce a large volume of HGV traffic over an extended period. The application does not clearly explain:

- how the environmental weight restriction will be addressed or complied with;
- whether exemptions are assumed; or
- what agreements have been reached with the highway authority.

The existing condition of the road is already a matter of concern. The carriageway exhibits frequent potholes, patch repairs and areas of surface degradation under current traffic conditions. The introduction of heavy construction traffic would predictably accelerate deterioration of both the surface and underlying structure.

This has two important consequences:

1. Highway safety risk — worsening road condition increases the likelihood of vehicle damage, loss of control and conflict between road users.
2. Impact on adjacent properties — repeated heavy vehicle movements over degraded surfaces can generate vibration and dynamic loading effects, particularly where buildings are located close to the carriageway.

The application does not provide sufficient detail on baseline structural surveys, monitoring regimes, maintenance triggers, funding arrangements or mitigation for affected properties.

Without such provisions, there is a material risk that the cost and consequences of road deterioration, including safety risk, property impact and maintenance liability, would be effectively externalised onto the local highway authority and residents rather than being properly controlled by the project.

3.4 Suitability of the B645 for sustained construction traffic

Beyond its current condition, the physical characteristics of the B645 limit its suitability for the level of traffic proposed. These include:

- constrained carriageway widths in places;
- bends and limited forward visibility;
- soft verges susceptible to overrun and damage;
- roadside drainage features; and
- sections lacking pedestrian infrastructure.

The cumulative effect of these characteristics is that the road operates effectively as a rural local route, not a corridor designed to accommodate sustained flows of heavy construction traffic.

The Transport Assessment does not fully address how these constraints interact with the proposed volume and type of traffic, particularly under peak construction conditions.

3.5 Rat-running and secondary network effects

Where traffic is concentrated on constrained routes, diversion onto minor roads is a well-recognised and foreseeable consequence. Drivers, particularly those unfamiliar with the area or relying on navigation systems, may seek alternative routes to avoid congestion, delay or perceived restriction.

The road network surrounding Hail Weston provides multiple opportunities for such diversion. However, these routes are:

- narrower and less structurally robust than the B645;
- often single-track or with limited passing places;
- used by pedestrians, cyclists and local agricultural traffic; and
- not designed to accommodate HGV movements.

Even a relatively small proportion of diverted traffic could result in a material change in safety and amenity conditions on these roads.

These diversion risks are illustrated spatially in Appendix B, which identifies the local road network characteristics and those routes that are inherently unsuitable for construction traffic and must therefore be subject to explicit No-Go / No-Through controls.

The constraints identified above are not unique to Hail Weston. The surrounding rural network in proximity to the Proposed Development includes a number of settlements and connecting routes

with similar characteristics, including, but not limited to, those serving Great Staughton, Little Staughton, Pertenhall, Keysoe, Kimbolton, Perry and Catworth.

This includes the wider local road network associated with the B645 corridor, together with the B660 and B661 routes and their connecting minor roads, which form part of an interconnected rural network rather than discrete, isolated routes. These corridors are characterised by constrained carriageway widths, limited forward visibility, frontage access, agricultural use and, in places, existing environmental or structural limitations.

In practice, where construction traffic is concentrated on a limited number of primary routes, displacement onto parallel or connecting corridors such as the B660 and B661 is a well-recognised and foreseeable outcome, particularly where drivers seek to avoid congestion, delay or perceived restriction. The physical characteristics of these routes mean that even limited diversion of HGV traffic could give rise to material safety and amenity impacts which have not been assessed within the Transport Assessment.

In the absence of clearly defined and enforceable routing controls secured across the network as a whole, there is a realistic risk that construction traffic would disperse beyond the primary assessed corridor, resulting in unassessed impacts across a wider rural area. This reinforces the need for routing assumptions to be secured on a network-wide basis, rather than relying solely on compliance along a single primary route.

3.6 Ford End Road and the A1/Little Paxton connection

Ford End Road represents a particularly unsuitable route linking Hail Weston to the A1/Little Paxton junction. It is a narrow rural lane with limited width, poor surface condition and constrained geometry.

Critically, it includes a ford crossing that is prone to flooding and periodic closure. During periods of high rainfall, water levels can rise rapidly, rendering the route hazardous or impassable.

Use of this route by project traffic would introduce significant risks, including:

- vehicles becoming stranded or damaged at the ford;
- unsafe interactions between vehicles attempting to pass on constrained sections; and
- obstruction of access for residents and emergency services.

These characteristics make Ford End Road wholly unsuitable for any form of project-related traffic.

This is not a theoretical assessment. The physical constraints, surface condition and flood-prone characteristics of Ford End Road are demonstrated by photographic evidence at Appendix A, which evidences the limited width, constrained geometry and unreliability of the route under normal and adverse conditions.

3.7 Need for enforceable routing controls

The impacts assessed within the Transport Assessment are predicated on assumed routing behaviour. If those assumptions are not secured, the actual impacts experienced may differ materially from those assessed.

The necessity for such controls is not theoretical but is evidenced by the physical and network constraints illustrated in Appendix A (Ford End Road) and Appendix B (No-Go / No-Through routing plan), which demonstrate that without enforceable restrictions, diversion or non-compliant routing would give rise to foreseeable and unacceptable safety risks.

It is therefore essential that routing controls are not left to guidance or contractor discretion, but are secured through enforceable provisions.

All routes through Hail Weston, including High Street, Bird Lane, Green Lane and Ford End Road, should be designated as No-Go / No-Through routes for all categories of project traffic.

Movements via the A1/Little Paxton junction that would introduce traffic onto unsuitable local roads or into St Neots should also be explicitly prohibited, consistent with the Applicant's stated assessment assumptions.

Routing controls should further include time-based restrictions preventing HGV movements during defined school start and finish periods, unless otherwise agreed with the relevant highway authority. This reflects the predictable and time-sensitive use of the local road network by school transport services and is necessary to avoid conflict between construction traffic and vulnerable road users on constrained rural routes.

3.8 Monitoring, enforcement and deliverability

To be effective, routing controls must be supported by robust monitoring and enforcement mechanisms. These should include:

- mandatory approved route plans for HGV movements;
- GPS tracking and auditing of vehicle movements;
- contractual obligations on contractors and suppliers;
- workforce travel plans restricting use of local roads;
- procedures for identifying and addressing non-compliance; and
- enforceable sanctions where breaches occur.

Reliance on informal measures or post-consent plan approval does not provide sufficient assurance to local communities that routing assumptions will be adhered to in practice.

3.9 Conclusion on construction traffic and highway safety impacts

For Hail Weston, the B645 is the unavoidable access route to the Proposed Development. The village would therefore experience a sustained and concentrated exposure to construction traffic over a prolonged period.

The combination of:

- high traffic volumes;
- constrained road geometry;
- frontage residential receptors;
- existing road condition; and
- the risk of diversion onto unsuitable routes

creates a materially different level of impact than that suggested by high-level network analysis.

In my experience of delivering and operating major infrastructure projects, traffic impacts of this nature require clear, enforceable controls secured in advance. Reliance on outline plans or contractor discretion is not consistent with good practice for projects of this scale and duration.

Similar concerns were also raised during the Open Floor Hearing in relation to the practical deliverability of the construction phase, including labour availability, accommodation, routing compliance and the enforceability of traffic management measures over an extended construction period. These points reinforce the need to distinguish between assessed impacts and likely real-world conditions. Absent enforceable controls, there is a material risk that the impacts experienced by Hail Weston will exceed those assessed and cannot be relied upon to be effectively mitigated in practice.

The scale and nature of these constraints are evidenced by the photographic and mapped material contained in Appendices A and B, which demonstrate that the identified risks arise from the physical characteristics of the network and are not capable of being mitigated through high-level or discretionary measures.

4. Battery Energy Storage System (BESS)

The Proposed Development includes a large-scale Battery Energy Storage System (BESS), which introduces the potential for major-accident hazards that are materially different in nature and consequence from those associated with solar generation alone. These risks have not been assessed through a sufficiently detailed, site-specific Quantified Risk Assessment at the point of examination.

The assessment presented relies on high-level narrative and generalised industry references rather than a robust, location-specific evaluation of risk pathways, consequence and mitigation. This creates a material evidential gap.

4.1 Absence of a site-specific Quantified Risk Assessment

A development of this scale, incorporating grid-scale lithium-ion battery storage, would reasonably be expected to be supported by a detailed Quantified Risk Assessment (QRA) addressing:

- the likelihood and propagation of thermal runaway events;
- fire duration, intensity and escalation scenarios;

- toxic gas and particulate emissions;
- over-pressure and explosion risk; and
- the interaction of these hazards with the surrounding environment.

No such assessment appears to have been provided in a form that allows the Examining Authority to evaluate risk to nearby receptors with confidence.

Without a QRA, it is not possible to determine whether the risks to people, property and the environment are within acceptable limits, or whether appropriate mitigation measures have been identified. This is particularly material in circumstances where there is no nationally prescribed minimum separation distance between BESS infrastructure and residential receptors. In such cases, the burden on site-specific evidence is necessarily higher. That evidential burden has not been met.

The requirement for a site-specific and quantified assessment is proportionate to the scale and nature of the development proposed. In the case of grid-scale battery storage located in proximity to residential receptors, reliance on generic industry guidance and post-consent submissions does not provide a sufficient evidential basis for the assessment of major-accident risk at the point of decision.

4.2 Toxic plume dispersion and public exposure

BESS fire events are known to produce complex mixtures of gases, including toxic and irritant compounds. The dispersion of such emissions is highly dependent on local meteorological conditions, topography and the spatial relationship between the installation and nearby receptors.

The application does not provide:

- site-specific plume dispersion modelling;
- identification of potential exposure zones;
- assessment of impacts on nearby residential properties; or
- evaluation of sheltering or evacuation requirements.

Given the proximity of Great Staughton, Hail Weston and other localised receptors, this represents a significant gap in the assessment of potential effects on human health.

4.3 Fire-water containment and environmental pathways

A further critical issue is the management of contaminated fire-water runoff in the event of a major incident. BESS fires can require prolonged suppression efforts, generating substantial volumes of contaminated water containing heavy metals, electrolytes and combustion by-products.

The application does not demonstrate:

- that containment systems are designed to accommodate worst-case fire scenarios;

- that such systems are impermeable and protected from failure;
- how runoff would be prevented from entering soils, drainage systems or watercourses; or
- how contaminated water would be managed, treated or disposed of.

This is particularly important in a rural environment where drainage networks and soil pathways may provide direct routes to groundwater or surface water receptors.

4.4 Emergency access and response constraints

The safe management of a BESS incident depends on effective emergency response. However, local conditions around the Order Limits present potential constraints, including:

- rural road networks with limited width and capacity for large emergency vehicles;
- reliance on the B645 and surrounding minor roads, which are already constrained;
- potential conflict with construction traffic during the build phase;
- limited local water supply infrastructure; and
- extended response times relative to urban locations.

The application does not demonstrate, on a site-specific and evidence-based basis, that emergency services would be able to access, contain and manage a worst-case event under realistic conditions.

4.5 Flood risk interaction

Given the known presence of flood-prone areas within the local network, there is a need to consider the interaction between BESS infrastructure and flood risk.

The application does not clearly assess:

- whether BESS units are located in areas at risk of flooding;
- how floodwater could interact with electrical infrastructure;
- the potential mobilisation of contaminants during flood events; or
- the resilience of containment systems under such conditions.

4.6 Operational model of the BESS and bidirectional grid charging

A further and separate issue is the operational model of the proposed BESS. The Applicant presents the BESS as associated with the solar generation scheme, but the available documentation indicates that its function is not limited to storing surplus on-site renewable generation.

The project documentation states that the Scheme would allow for the generation and export of up to 400 MW of renewable electricity, as well as the storage and export of up to 100 MW of electricity in the BESS. Elsewhere, the Environmental Statement (APP-038) describes the BESS as providing grid balancing services. Those descriptions are important because they indicate that the BESS is intended to operate as an electrically integrated, bidirectional storage asset

connected to the wider transmission system, rather than as a passive appendage that can only absorb surplus power produced by the solar arrays.

Such assets typically derive revenue from electricity price arbitrage, balancing services and ancillary grid functions, rather than solely from storing co-located renewable generation. In those circumstances, the carbon intensity of electricity imported for charging is determined by prevailing grid conditions at the time of import, and cannot be assumed to be low-carbon or equivalent to on-site renewable generation.

In practical terms, a bidirectional grid connection creates the ability for the BESS to import electricity from the grid for charging, and not merely to charge from on-site solar generation. Unless expressly restricted, that imported electricity could include electricity generated from non-renewable or mixed grid sources. The Application does not identify any secured technical, commercial or regulatory mechanism, and it does not define any operational constraint within the draft DCO that would limit the source or proportion of electricity used for charging.

That gives rise to three material implications.

First, it affects the claimed carbon benefit of the project. If the BESS can be charged from the grid at times when marginal grid electricity is derived in whole or in part from fossil-fuel generation, then the operation of the BESS cannot automatically be treated as an extension of low-carbon solar output. The climate benefit of the combined solar-plus-storage scheme is therefore dependent not simply on installed capacity, but on the actual charging and dispatch regime adopted in practice.

Second, it affects the character of the development for planning purposes. A BESS capable of full grid charging and grid balancing is, in substance, a market-responsive electricity storage asset with its own operational logic, revenue model and risk profile. That is materially different from a storage system whose function is limited to smoothing or time-shifting the export of electricity generated by the co-located solar farm.

Third, it creates a further evidential gap in the Application. The Applicant has not clearly explained:

- whether the BESS will be permitted to charge from the grid independently of on-site solar generation;
- whether any restriction is proposed on charging from non-renewable or mixed grid sources;
- how such charging behaviour has been reflected in the greenhouse gas assessment;
- whether the noise, operating profile and traffic assumptions associated with BESS use reflect a market-led, grid-balancing operational regime; or
- whether the draft DCO secures any operational limitation tying the BESS to the output of the solar generating station.

Where such clarification has not been provided, the Examining Authority cannot safely assume that the BESS will operate solely, or even predominantly, as a storage asset for surplus renewable generation from the Proposed Development itself.

This matters because the Applicant's case on need, proportionality and carbon benefit is presented on the basis of a renewable energy scheme with associated storage. If, in reality, the BESS is capable of operating as a bidirectional grid-charged storage asset responding to wider market and balancing signals, then the claimed environmental and system benefits require more careful and transparent examination than the Application presently provides.

At a minimum, the Development Consent Order should not leave this issue unresolved. A defined operational envelope could, for example, include the following:

• a requirement that the BESS may only be charged from electricity generated by the authorised solar generating station, save for limited auxiliary imports necessary for system stability or maintenance;

• or, in the alternative, a quantified cap on the proportion of electricity that may be imported from the grid over a defined period (for example, expressed as a percentage of total annual throughput);

• a prohibition on sustained or routine charging from the transmission network where such charging is not directly associated with the storage and time-shifting of on-site renewable generation;

• a requirement for metering, monitoring and reporting of import and export flows to demonstrate compliance with any such restrictions; and

• a mechanism for enforcement, including defined thresholds beyond which operation would be in breach of the Order.

In the absence of such provisions, the operational flexibility inherent in a bidirectional grid connection would allow the BESS to function as a market-responsive trading and balancing asset, rather than as infrastructure ancillary to renewable generation. That would represent a materially different development from that assessed in the Environmental Statement.

If the Applicant's case depends on the BESS being treated as part of the renewable energy benefit of the scheme, that operational assumption must be expressly secured through the DCO. If no such restriction is proposed, the Applicant should assess and explain the implications of unrestricted grid charging, including charging from non-renewable sources, for carbon accounting, operational impacts and the planning balance. That concern is reinforced by evidence presented during the Open Floor Hearing that battery storage systems of this type are capable of importing electricity directly from the grid and operating independently of on-site generation, and by the discussion at Issue Specific Hearing 1 identifying that the authorised grid connection would be capable of bi-directional operation without a clearly defined operational envelope on the face of the Order governing import for battery charging. This creates a material distinction between storage that directly supports renewable generation and infrastructure that may operate, in practice, as a grid-connected trading and balancing asset. That distinction is

relevant to the assessment of need, carbon benefit and public benefit, and raises the realistic prospect of a materially different scheme from that assessed.

4.7 Reliance on future submissions

A consistent theme is the reliance on future design development and post-consent approvals to address these issues. This approach prevents the Examining Authority from assessing risk at the point of decision and transfers uncertainty into the post-consent phase.

For a development involving potential major-accident hazards, this level of deferral is not appropriate.

4.8 Implications for EIA and planning judgment

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) require assessment of vulnerability to major accidents and disasters. Where a detailed, site-specific risk assessment, has not been provided, it is not possible to conclude that this requirement has been satisfied.

This introduces uncertainty into the planning balance, particularly given the proximity of residential receptors.

In these circumstances, the absence of a quantified and site-specific assessment gives rise not only to evidential uncertainty, but to a potential failure to comply with the requirement to assess likely significant effects and vulnerability to major accidents in a manner sufficient to inform the decision-maker.

4.9 Required safeguards

To provide an appropriate level of certainty, and to enable the Examining Authority to reach a reasoned conclusion on likely significant effects, the following information should be provided, tested and consulted upon during the Examination, rather than deferred to post-consent stages:

• a site-specific Quantified Risk Assessment, including independent review, addressing thermal runaway, fire propagation, explosion risk and off-site consequences;

• plume dispersion and over-pressure modelling identifying potential exposure zones and effects on nearby receptors;

• a fully engineered fire-water containment and pollution control strategy, demonstrating capacity, integrity and environmental protection under worst-case scenarios;

• evidence demonstrating that emergency access and response arrangements are deliverable in practice, having regard to local road constraints and response times; and

• a clearly defined framework for ongoing monitoring, compliance and enforcement over the operational life of the BESS.

In the absence of this information, the Examining Authority cannot be satisfied that the likely significant effects of the BESS component have been properly identified, assessed and mitigated in accordance with the requirements of the EIA Regulations.

4.10 Conclusion on BESS safety, risk and evidential adequacy

As currently presented, the application does not provide sufficient evidence to demonstrate that the risks associated with the BESS can be effectively managed. The absence of a quantified, site-specific assessment and secured mitigation measures represents a material deficiency that should be addressed prior to any grant of development consent.

5. Loss of Best and Most Versatile agricultural land

The Proposed Development would result in the long-term use of a substantial area of productive agricultural land, including land classified as Best and Most Versatile (BMV). While described as temporary, the operational life of the scheme extends over several decades, during which the land would be effectively removed from conventional agricultural use and its soil structure and function altered.

The Applicant has not demonstrated that the use of BMV land at this location is necessary or justified.

I note that similar concerns were raised during the Open Floor Hearing, including in relation to whether lower-quality or previously developed land had been properly considered and whether the chosen site represents the least harmful practicable option. During Issue Specific Hearing 2, it was also confirmed that a substantial majority of the Order Limits comprise Best and Most Versatile land, with the chosen location emerging from the interaction of grid proximity, the Applicant's self-imposed 15 km search radius and the availability of land secured through voluntary agreement, rather than a comprehensive and unconstrained assessment of suitable alternatives.

These points support the conclusion that the Application does not yet provide a sufficiently transparent, evidenced or spatially comprehensive sequential approach to site selection.

The issue for the Examination is not simply whether BMV land is present, but whether its extensive use has been demonstrated to be genuinely unavoidable in circumstances where the search area and site selection process have been materially constrained by project-defined parameters rather than a full assessment of reasonable alternatives.

5.1 Absence of a robust sequential or comparative assessment

National policy does not prohibit the use of BMV land for solar development, but it does require that poorer quality land is preferred where reasonably available, and that the use of higher-quality land is justified by reference to a robust assessment of alternatives. In this context, it would be expected that the application is supported by a clear and transparent assessment demonstrating:

- the availability of lower-grade (non-BMV) land within the relevant grid connection area;
- a comparative evaluation of environmental, agricultural and technical constraints; and
- a reasoned justification for selecting this site in preference to lower-impact alternatives.

The application does not provide such an assessment in a form that allows the Examining Authority to understand whether the use of BMV land has been avoided where possible. Therefore, policy compliance cannot be assumed.

5.2 Reliance on voluntary land agreements

The site selection process appears to be driven primarily by the availability of land secured through voluntary agreements with landowners, rather than by a comprehensive assessment of land suitability across a wider search area.

While this is a common commercial approach, it is not, in itself, a sufficient planning justification for the selection of higher-quality agricultural land. A site being available does not demonstrate that it is the most appropriate site in planning terms.

In particular, the application does not demonstrate that:

- lower-grade land within the same grid catchment or connection opportunity was systematically identified and assessed;
- constraints on alternative sites were such that they could not reasonably accommodate development; or
- the chosen site represents the least harmful option in terms of agricultural land use.

The reliance on voluntary land agreements introduces a potential selection bias, whereby land that is easier to assemble is preferred over land that may be more appropriate in planning terms.

In effect, the site selection process appears to be constrained by land availability rather than directed by an objective assessment of planning suitability. That is not consistent with the requirement to demonstrate that environmental effects have been avoided, reduced or minimised through the consideration of reasonable alternatives.

This issue was also raised during Issue Specific Hearing 2, including whether lower-quality land may exist but was not pursued because it was not readily available to the Applicant on a voluntary basis. This is a critical distinction. Compulsory acquisition powers exist to enable land assembly in the public interest where necessary; they do not, without more, justify a site selection outcome driven by convenience of assembly.

5.3 Lack of evidence on alternative land availability

There is no clear evidence within the application demonstrating that the availability of non-BMV land has been exhausted or that such land could not accommodate a scheme of comparable scale.

Given the scale of the Proposed Development, and the flexibility inherent in solar deployment, it would be reasonable to expect a GIS-based or otherwise systematic analysis of land quality within a defined search area. The absence of such analysis means that the Examining Authority is not provided with sufficient information to conclude that the use of BMV land is necessary.

5.4 Permanence of impact

Although solar development is often described as reversible, the practical reality is that long-term installation of infrastructure can have lasting effects on soil structure, drainage patterns and agricultural productivity.

These may include:

- soil compaction and structural degradation;
- disturbance or removal of field drainage systems;
- changes to soil chemistry and biological function; and
- reduced capacity to return land to its previous agricultural use.

Without clearly defined and secured restoration standards, there is a risk that the impact on agricultural land is effectively permanent.

5.5 Interaction with wider land use and food production

The land surrounding the Order Limits forms part of a coherent agricultural landscape supporting local farm businesses and contributing to regional food production. The loss of significant areas of productive land may have cumulative effects on farm viability, land management and rural character.

Where such land is of higher quality, the threshold for justification should be correspondingly higher.

5.6 Implications for the Planning Balance

The absence of a robust alternatives assessment, combined with reliance on land availability rather than land suitability, means that the Applicant has not demonstrated that the use of BMV land is necessary.

This is particularly important when considered alongside:

- the land-use efficiency considerations identified in Sections 2.1 and 2.2, including the extent to which comparable levels of renewable generation could, in principle, be delivered with materially less displacement of agricultural land;
- the relatively modest level of energy likely to be delivered annually;
- the long-term nature of the land-use change; and
- the availability of alternative means of delivering renewable energy.

In these circumstances, the loss of BMV land should be afforded significant weight in the planning balance.

During Issue Specific Hearing 2, the Applicant sought to minimise the significance of the loss of agricultural production by describing it as “very marginal”, citing figures of approximately 0.16% of East of England wheat production and about 0.03% of national wheat production. That approach materially assists the proportionality analysis, because it exposes the same limitation

in the Applicant's case on national energy benefit. If a nationally small loss of food production is said to be immaterial, then a nationally small electricity contribution of around 0.13–0.14% of UK demand cannot, without more, be treated as carrying decisive weight.

On that basis, both the claimed benefit and the claimed harm are small when expressed at national scale. The issue is therefore not one of arithmetic, but of necessity and site selection.

The Application does not demonstrate that the use of Best and Most Versatile land is unavoidable. The site selection process was constrained by a self-imposed 15 km search radius tied to a chosen grid connection point, excluding a substantially larger area of land within a 20 km envelope, approximately 550 km^2 of additional search area, nearly 80 times the size of the Order Limits, which has not been assessed. That omitted area is of a wholly different order of magnitude to the Order Limits and is capable, in principle, of accommodating development on lower-grade land.

In those circumstances, the loss of BMV land and associated food-producing capacity cannot be characterised as an inherent or necessary consequence of delivering the scheme. It is instead a consequence of a constrained and project-defined search methodology. That conclusion is reinforced by the evidence in Section 2.2 that materially different land-use outcomes are possible for comparable levels of renewable generation, indicating that the scale of agricultural land take is not an inherent characteristic of the energy output proposed, but a function of site selection and project configuration. Where a materially less harmful alternative has not been properly assessed, the resulting loss of agricultural productivity cannot be discounted as "immaterial", and must attract significant weight in the planning balance.

This conclusion is reinforced by the uncertainty identified in Section 2.5 regarding the scale and reliability of the Scheme's claimed carbon benefit. Where the principal benefit is itself subject to material evidential uncertainty, the justification for the loss of Best and Most Versatile land is correspondingly weakened.

5.7 Conclusion on loss of Best and Most Versatile agricultural Land

On the information provided, it has not been demonstrated that the Proposed Development represents the least harmful or most appropriate use of land within the relevant area. The reliance on voluntarily assembled land, without a transparent and comparative assessment of lower-grade alternatives, represents a material deficiency in the application.

6. Residential amenity

The application does not provide sufficient evidence or secured controls to demonstrate that the long-term living conditions of nearby residents, including those in Hail Weston, will be adequately protected over the operational life of the Proposed Development.

In the absence of nationally defined separation standards for large-scale solar or Battery Energy Storage System (BESS) infrastructure, it is particularly important that site-specific assessment is robust and that mitigation is clearly defined and secured. In this case, there are a number of material deficiencies.

6.1 Lack of clear receptor mapping

The application does not provide a clear and accessible mapping of residential receptors in relation to the proposed infrastructure. While individual assessments may reference nearby properties, there is no consolidated plan showing:

- distances between solar arrays, inverters, BESS units and residential dwellings;
- the relative positioning of sensitive receptors;
- areas where separation distances are minimal; and
- cumulative exposure where multiple infrastructure elements are located in proximity to the same receptors.

Without this information, it is difficult to understand the true extent of potential impact or to verify that the assessment has captured worst-case scenarios.

6.2 Noise assessment limitations

Operational noise from solar infrastructure and associated equipment, particularly inverters, transformers and BESS components, has the potential to affect nearby residents over long periods.

The application does not clearly demonstrate that:

- all relevant noise sources have been assessed on a consistent basis;
- cumulative noise from multiple sources has been considered;
- tonal or low-frequency characteristics have been adequately addressed;
- worst-case operating conditions have been assessed; or
- appropriate noise limits have been defined relative to background levels.

In addition, there is no clear indication that operational noise limits will be secured as enforceable thresholds within the DCO. Without such limits, there is no mechanism to ensure that impacts remain within acceptable levels over time.

6.3 Lighting impacts and control

The Proposed Development is likely to introduce new sources of artificial lighting, including for:

- site security;
- maintenance access;
- inverter and BESS infrastructure; and
- temporary construction activities.

The application does not provide a detailed lighting assessment demonstrating:

- the extent of light spill affecting nearby residential properties;

- impacts on dark skies in a rural environment;
- the duration and frequency of lighting use; or
- mitigation measures to minimise visual intrusion.

Critically, there is no evidence that a binding lighting strategy, including defined lux limits, directional controls and curfews, will be secured through the DCO.

This creates a situation in which impacts may be identified in principle but are not controlled in practice, a distinction that is critical in the context of a multi-decade consent.

6.4 Absence of secured long-term controls

A central issue is not simply the adequacy of the assessment, but the absence of secured, enforceable controls over the operational life of the project, which may extend for several decades.

The application does not clearly provide for:

- ongoing monitoring of noise and lighting impacts;
- mechanisms for investigating and addressing complaints;
- defined thresholds triggering mitigation or remedial action;
- periodic review of operational impacts; or
- enforcement provisions accessible to local authorities and residents.

Without such mechanisms, there is a risk that impacts could arise or increase over time without an effective means of control.

6.5 Sensitivity of the receiving environment

Hail Weston is a small rural settlement with low baseline noise levels, limited artificial lighting and a high degree of tranquillity. In such environments, even relatively modest increases in noise or light can have a disproportionate effect on residential amenity.

This sensitivity is not confined to Hail Weston alone, but is characteristic of the wider rural settlements surrounding the Order Limits, including Great Staughton, Little Staughton, Pertenhall, Keysoe and Swineshead, all of which are defined by similar environmental baselines and patterns of dispersed residential receptors.

In such locations, the absence of existing background noise and lighting, combined with open landscape character, increases the perceptibility of change and reduces the capacity of the environment to absorb additional disturbance.

Properties located in close proximity to the Proposed Development are particularly sensitive, given the scale and duration of the project and the extent to which effects may arise across multiple phases of construction and operation.

6.6 Implications for the Planning Balance

The absence of robust assessment and secured controls introduces uncertainty regarding long-term living conditions for affected residents. This is particularly significant given that:

- impacts would persist over a multi-decade period;
- receptors are in close proximity to infrastructure; and
- the rural baseline environment is highly sensitive to change.

In these circumstances, the planning balance must take into account not only the impacts assessed, but also the risk that those impacts are understated or not effectively controlled.

6.7 Required safeguards

To provide appropriate certainty, the Development Consent Order should secure:

- a consolidated receptor mapping plan showing distances and exposure;
- enforceable operational noise limits expressed as numerical thresholds;
- specific controls addressing tonal and low-frequency noise;
- a binding lighting strategy with defined limits, directionality and curfews;
- ongoing monitoring and reporting requirements; and
- clear mechanisms for enforcement and remediation.

6.8 Conclusion on residential amenity effects and control

As currently presented, the application does not provide sufficient assurance that residential amenity will be protected over the lifetime of the development. The absence of clear assessment, defined standards and enforceable controls represents a material deficiency that should be addressed prior to any grant of development consent.

7. Financial security and decommissioning

The Applicant's Funding Statement (PDA-009) does not provide a secured or fully defined financial mechanism to guarantee that decommissioning, removal of infrastructure and restoration of the land will be delivered in full at the end of the operational life of the Proposed Development.

While the Environmental Statement and supporting documents refer to decommissioning in principle, the approach relies primarily on future plan submission and general commitments rather than a comprehensive, enforceable framework secured at the point of consent.

7.1 Absence of a secured financial mechanism

There is no clear evidence that a ring-fenced financial security mechanism, such as an on-demand letter of credit, escrow arrangement or equivalent instrument, will be put in place prior to commencement of development. There is also no clarity as to:

- the quantum of funding required to cover full decommissioning and restoration;

- the basis on which such costs have been estimated;
- how funding would be secured against changes in ownership or corporate structure; or
- how funds would be protected over the multi-decade operational life of the project.

Without such provisions, there is a material risk that the cost of decommissioning could fall to landowners or the public sector.

This issue is not addressed by reliance on general corporate support or parent company guarantees, which, for the reasons set out in Section 7.5 below, do not provide an equivalent level of security.

7.2 Scope of decommissioning and restoration

The application does not clearly define the scope of infrastructure to be removed at end of life. In particular, it is unclear whether decommissioning would include:

- removal of below-ground infrastructure such as piles, foundations, cabling, ducting and drainage systems;
- removal of access tracks and hardstandings;
- remediation of compacted or structurally altered soils;
- reinstatement of agricultural land to its former productivity and function.

Without a clearly defined scope, it is not possible to determine whether the land can be returned to its current use, and does not quantify the financial provision required.

During Issue Specific Hearing 2, specific questions were raised as to whether sub-surface infrastructure, including piles, cabling and associated works, would be removed in full at decommissioning, and what evidence supports restoration of soil function to pre-development condition. The absence of a clearly secured and evidenced restoration standard introduces uncertainty as to whether agricultural productivity can in fact be reinstated to its current condition.

7.3 Reliance on future plan submission

The draft DCO appears to rely on submission of a decommissioning plan at or near the end of the operational period. This approach introduces significant uncertainty, as it defers key decisions on scope, methodology and standards until many years after consent is granted.

At that point, site conditions, ownership structures and regulatory context may have changed materially. There is therefore a risk that restoration is either reduced in scope or not delivered to the standard assumed at examination.

I note that this approach was discussed during Issue Specific Hearing 1, where reliance was placed on future submission of a decommissioning plan at the end of the project life rather than a secured framework at the point of consent. This introduces material uncertainty over whether restoration will be delivered in full, particularly given the potential for changes in ownership or financial structure over the lifetime of the development.

7.4 Long-term risk profile

The operational life of the Proposed Development is expected to extend over several decades. During this period, it is reasonably foreseeable that:

- ownership of the project may change;
- the operating entity may be restructured or dissolved;
- financial priorities may shift; or
- the economic case for full restoration may weaken.

Without a secured and independently enforceable financial mechanism, these factors create a material risk that decommissioning obligations may not be met in full.

In my experience at both project and board level, long-term infrastructure liabilities of this kind must be secured through robust, ring-fenced financial mechanisms. Infrastructure assets are commonly held through special purpose vehicles and may be subject to refinancing, transfer or restructuring over time. Absent secured and enduring financial provision, there is no reliable basis on which to conclude that end-of-life obligations will remain matched to a solvent and accountable entity. This risk is not theoretical.

7.5 Precedent and the role of the Examining Authority

It is anticipated that the Applicant may seek to rely on the approach taken in other consented solar NSIP schemes, in which a fully ring-fenced financial security mechanism for decommissioning and restoration has not always been secured at the point of consent.

However, the existence of such precedents does not demonstrate that the risk identified above is acceptable, nor does it provide assurance to affected communities, landowners, local authorities or future stakeholders that restoration liabilities will be met in full. At most, it indicates that in previous cases the issue has not been comprehensively addressed or tested.

Each application must be determined on its own merits and on the adequacy of the evidence before the Examination. The Planning Act 2008 and the EIA Regulations require that likely significant effects, including long-term and cumulative effects, are properly understood and that mitigation is secured where necessary. Those duties are not displaced by reference to prior decision-making practice.

In this context, the absence of a secured financial mechanism in other schemes does not reduce the level of risk in this case. Rather, it highlights a systemic gap in how long-term liabilities have been addressed in the sector to date. The Examining Authority is not bound to replicate that approach and has the ability, and in my submission the responsibility, to ensure that appropriate safeguards are secured where a material and foreseeable risk has been identified.

This is particularly important for infrastructure of this scale and duration. Development consent confers a valuable and transferable asset. It is well established that such projects may be sold, refinanced or restructured over time. In those circumstances, reliance on unsecured or future commitments does not provide a reliable mechanism for protecting the public interest.

If the Proposed Development is to be regarded as nationally significant infrastructure, it should be accompanied by a corresponding level of protection for the public, the environment and future generations. The existence of national policy support for low-carbon energy does not justify the deferral of fundamental safeguards, nor does it outweigh the need to ensure that long-term liabilities are properly secured at the point of consent.

The question for the Examination is not whether previous schemes have proceeded without such safeguards, but whether, on the evidence before it, the risk of under-secured decommissioning and restoration is acceptable in this case. In my submission, it is not.

7.6 Limitations of Parent Company Guarantees and corporate support

In the context of long-term infrastructure liabilities of this nature, reliance on a parent company guarantee or general corporate support is not, in my experience, a sufficient or reliable mechanism for securing decommissioning and restoration obligations.

By way of example, I have direct professional experience of major infrastructure providers entering insolvency as a result of financial exposure arising from unrelated projects in other jurisdictions, including the insolvency of CNIM Group and AE&E GmbH. In those cases, corporate failure at group level resulted in a rapid deterioration in the value and enforceability of parent company support arrangements, with consequential implications for projects in other countries, including the UK.

This is a recognised risk in the infrastructure sector. Parent company guarantees are only as robust as the ongoing financial strength and stability of the guarantor. They are not ring-fenced, may be affected by wider group liabilities, and can become of limited or no practical value in circumstances of insolvency, restructuring or cross-default.

This risk is particularly acute where:

• projects are held within special purpose vehicles;

• ownership structures may change over time;

• parent entities operate across multiple jurisdictions and sectors; and

• financial exposure arises from unrelated projects beyond the control of the UK asset.

In such circumstances, reliance on corporate guarantees does not provide the level of certainty required to ensure that long-term liabilities, including decommissioning, infrastructure removal and land restoration, will be met in full.

For a project of this scale, duration and environmental sensitivity, good practice is to secure obligations through ring-fenced financial instruments, such as escrow accounts, bonds or independently secured funds, which are insulated from wider corporate risk and remain available irrespective of changes in ownership or financial structure.

Where no such mechanism exists, there is a material and foreseeable risk that restoration liabilities may become under-secured or unenforceable over time.

7.7 Indicative scale of decommissioning and restoration liability

No project-specific estimate of decommissioning and restoration cost has been provided by the Applicant. However, publicly available benchmark evidence, together with the Applicant's own capital cost assumptions, allows the likely scale of liability to be illustrated.

The Department for Energy Security and Net Zero's 2024 cost update (prepared by Arup) identifies indicative solar decommissioning costs in the range of approximately £4,000–£25,000 per MW. Applied to the Proposed Development's 400 MW capacity, this equates to an indicative cost in the order of approximately £1.6 million to £10.0 million.

However, those figures are derived from a limited dataset and do not define the scope of decommissioning assumed. In particular, they do not demonstrate inclusion of full removal of below-ground infrastructure (including piles, cabling and drainage systems), and does not guarantee restoration of soil structure and agricultural function to pre-development condition. They should therefore be understood as a minimum indicative benchmark for partial or standard decommissioning, rather than a fully scoped estimate of end-of-life liability.

The Applicant's Funding Statement identifies a total estimated construction cost of approximately £370 million, including £297 million for solar infrastructure and £73 million for the Battery Energy Storage System.

International Renewable Energy Agency (IRENA) lifecycle evidence indicates that decommissioning and end-of-life costs for utility-scale solar developments may typically fall in the order of 5–10% of capital expenditure. Applied to the Applicant's stated project cost, this suggests a potential decommissioning liability in the range of approximately £18.5 million to £37 million.

As the Applicant's capital cost includes the BESS, this percentage-based estimate implicitly includes an allowance for battery decommissioning at a high level. However, the IRENA benchmark is a generalised lifecycle metric and does not disaggregate the specific cost components associated with grid-scale battery systems, including specialist dismantling, hazardous materials handling, transport and recycling. These elements introduce additional technical complexity and cost variability which may not be fully captured within a generic percentage-based estimate.

Accordingly, when moving from a minimum benchmark of approximately £1.6–£10.0 million (based on limited-scope assumptions) to a lifecycle-based estimate of approximately £18.5–£37 million (based on full capital cost), and allowing for full removal of below-ground infrastructure, reinstatement of drainage systems, restoration of soil structure and agricultural productivity, it is reasonably foreseeable that the total decommissioning and restoration cost for a scheme of this scale could extend beyond 15% of capital expenditure (£55 million or more).

In that context, the absence of any project-specific, costed decommissioning assessment is not a neutral omission. The benchmarks relied upon above are publicly available, widely cited and well understood within the infrastructure and energy sector. The Applicant is promoting a 400 MW solar development with a 100 MW Battery Energy Storage System, involving the long-term use of a substantial area of Best and Most Versatile agricultural land, yet has not provided any quantified

assessment of the cost of restoring that land, removing infrastructure or managing end-of-life environmental liabilities.

This represents a clear and material evidential gap. It means that the Examination is being asked to consider the benefits of the Proposed Development without a corresponding and evidenced understanding of the scale of its end-of-life obligations, or the financial provision required to secure them. In those circumstances, there is no reliable basis on which to conclude that the site would be restored to its original condition, or that the costs of doing so would be borne by the developer rather than externalised to landowners or the public.

As presently advanced, the Application seeks the benefit of a long-term statutory consent for development of this scale without providing any defined, secured or costed mechanism to ensure that the land, soils and wider environment are returned to their original condition at end of life.

The purpose of this analysis is not to fix a precise decommissioning cost at this stage, but to demonstrate that the scale of potential liability is material and foreseeable. In those circumstances, the absence of any project-specific estimate or secured financial provision is a substantive evidential gap. Where a long-term liability of this magnitude is reasonably foreseeable, good practice requires that it is both quantified and secured at the point of consent.

7.8 Implications for the Planning Balance

The absence of a secured decommissioning and restoration framework introduces a long-term residual risk that is not fully accounted for in the Environmental Statement. This is particularly relevant where:

- large areas of productive agricultural land are affected;
- restoration outcomes are uncertain; and
- impacts may persist beyond the operational life of the scheme.

In these circumstances, the planning balance must take into account not only the impacts during operation, but also the risk that the site is not properly restored.

7.9 Required safeguards

To provide appropriate certainty, the Development Consent Order should secure:

- a detailed decommissioning and restoration plan approved prior to commencement of development;
- a clearly defined scope of infrastructure removal, including below-ground elements;
- measurable restoration standards linked to soil function and agricultural productivity;
- a ring-fenced financial security mechanism sufficient to cover full decommissioning costs;
- periodic review and indexation of the financial provision; and
- provisions ensuring that the obligation is enforceable against successors in title.

7.10 Conclusion on financial security, decommissioning and restoration

As currently presented, the application does not provide sufficient assurance that the site will be restored in full at the end of its operational life. The absence of a secured financial mechanism and clearly defined restoration framework represents a material deficiency that should be addressed prior to any grant of development consent.

8. Deficiencies in the draft Development Consent Order

The draft Development Consent Order (DCO) (PDA-005) relies heavily on outline plans, post-consent approvals and undefined future submissions, rather than securing the mitigation relied upon in the Environmental Statement as clear, enforceable Requirements.

This creates a material disconnect between the impacts assessed in the Environmental Statement and the development that would in fact be secured through the Order.

In the DCO regime, mitigation can only be relied upon to the extent that it is secured through enforceable provisions. Where key controls are deferred or left to later approval, there is no assurance that impacts will be mitigated to the level assumed in the assessment.

I note that this concern was expressly raised during Issue Specific Hearing 1, where it was observed that a number of environmental effects rely on mitigation or operational controls that are not secured through clear, enforceable provisions within the draft Order itself.

8.1 Reliance on outline plans and deferred detail

Across multiple topic areas, the draft DCO relies on the submission of outline management plans for approval after consent is granted. These include, for example:

- Construction Traffic Management Plans;
- Construction Environmental Management Plans;
- operational management and monitoring strategies; and
- decommissioning and restoration plans.

While such plans are standard in principle, the issue here is the absence of fixed parameters within those plans. The DCO does not appear to secure:

- definitive routing strategies;
- quantified limits (e.g. traffic caps, noise thresholds);
- binding design parameters; or
- clear performance standards against which compliance can be assessed.

As a result, matters that materially influence impact are left to future agreement, rather than secured at the point of consent.

The Examining Authority has also made clear that the examination will focus on how the proposed development would be controlled, alongside the balance of benefits and disbenefits.

This is not a drafting preference but a substantive issue: unless controls are secured, the decision-maker cannot rely on the mitigation assumed in the Environmental Statement.

During Issue Specific Hearing 1 it was further noted that, in several areas, essential detail is deferred to future plans or approvals without defining the standards to be achieved, the outcomes required, or the criteria by which those outcomes would be assessed. This confirms that the Examination is being asked to rely on mitigation described in principle but not yet secured within the legally enforceable framework of the Order.

8.2 Lack of enforceable controls on construction traffic

The Environmental Statement relies on assumptions regarding routing, traffic volumes and behavioural controls. However, these do not appear to be translated into enforceable DCO Requirements.

In particular, the draft DCO does not clearly secure:

- fixed HGV routing with no contractor discretion;
- daily or peak-period movement limits;
- enforceable restrictions on use of minor roads;
- monitoring mechanisms such as GPS tracking;
- sanctions or remedial measures in the event of non-compliance.

Without such provisions, the Environmental Statement does not provide a reliable basis for assessing likely significant effects in practice.

This is not a theoretical concern. The route-specific constraints identified in Section 3, and evidenced in Appendices A and B, demonstrate that the local highway network is inherently unsuitable for uncontrolled or discretionary routing. In those circumstances, the absence of secured, enforceable routing controls means that the impacts assessed in the Environmental Statement cannot be relied upon as representing likely real-world conditions.

8.3 BESS safety and major accident risk

The assessment of BESS-related risks relies on high-level narrative and future submissions rather than a fully defined and secured framework.

The draft DCO does not appear to include a standalone Requirement preventing commencement of BESS development until:

- a site-specific Quantified Risk Assessment is completed and approved;
- plume dispersion and over-pressure modelling are undertaken;
- fire-water containment and pollution control systems are fully designed;
- emergency response arrangements are demonstrated to be deliverable.

In the absence of such provisions, the Examining Authority is effectively being asked to accept unquantified and untested major-accident risk at the point of decision.

8.4 Agricultural land, soils and drainage

The Environmental Statement relies on assumptions regarding soil handling, drainage retention and restoration of agricultural land. However, these outcomes are not clearly secured through enforceable Requirements.

The draft DCO does not appear to require:

- detailed soil resource mapping and handling specifications;
- protection or reinstatement of existing drainage systems;
- measurable restoration standards linked to agricultural productivity;
- independent monitoring and verification of soil condition post-construction;
- defined remediation triggers if restoration is unsuccessful.

Given the long-term nature of the development, these omissions mean that restoration outcomes cannot be assumed or relied upon.

8.5 Noise, lighting and residential amenity

The assessment of operational impacts on nearby residents relies on modelling and assumptions that are not clearly translated into binding controls.

The draft DCO does not appear to secure:

- numerical noise limits expressed as enforceable thresholds;
- controls on tonal or low-frequency noise;
- a binding lighting strategy with defined lux limits and curfews;
- ongoing monitoring and enforcement provisions.

Without such controls, there is no enforceable mechanism to secure protection of residential amenity over the operational life of the project.

8.6 Decommissioning, restoration and financial Security

The approach to decommissioning relies heavily on future plan submission rather than a fully secured framework.

The draft DCO does not appear to provide:

- a requirement for a detailed decommissioning plan to be approved prior to construction;
- a clear commitment to removal of below-ground infrastructure;
- defined restoration standards;
- a ring-fenced financial security mechanism sufficient to guarantee delivery;
- protections against changes in ownership or financial structure over time.

This creates a foreseeable risk that restoration obligations may not be delivered in full.

Given the long operational life of the Proposed Development, the likelihood of refinancing, transfer or restructuring over time, and the absence of secured enduring financial provision, there is no evidential basis on which to conclude that restoration liabilities will remain matched to a solvent and accountable entity.

8.7 Structural weakness in the DCO approach

Taken together, these issues demonstrate a structural deficiency: the draft DCO seeks consent for a scheme whose defining controls are not yet secured, relying instead on future submissions and approvals.

This approach:

- reduces certainty for affected communities;
- limits the ability of the Examining Authority to assess impacts fully;
- creates enforcement challenges for local authorities; and
- introduces delivery risk over a multi-decade project lifecycle.

This underlines the fundamental principle that mitigation is only as effective as the controls by which it is secured.

In practical terms, the draft DCO does not secure the project that has been assessed; it secures a framework within which a materially different development could be implemented.

This issue was articulated during Issue Specific Hearing 1 as the distinction between the scheme that has been assessed in the Environmental Statement and the scheme that is actually secured through the Development Consent Order.

That distinction is critical. If mitigation and operational controls are not embedded within the Order, there is no assurance that the development as implemented will correspond to that assessed.

While it is recognised that Development Consent Orders commonly include outline plans and post-consent approvals, there is a clear distinction between permissible flexibility in detailed design and the deferral of matters that go to the assessment of likely significant effects. Where the latter are left undefined, the decision-maker cannot be satisfied that the impacts assessed will correspond to those delivered in practice.

Where, as demonstrated in this Written Representation, physical and operational constraints are fixed and evidenced, reliance on undefined future controls creates a clear risk that the development as delivered would differ materially from that assessed.

8.8 Conclusion on DCO controls and securing of mitigation

The current drafting of the DCO does not provide sufficient certainty that the impacts identified in the Environmental Statement will be properly controlled, mitigated or enforced.

The Examining Authority is therefore respectfully requested to require that all mitigation relied upon in the Environmental Statement is secured through clear, enforceable and, where

necessary, pre-commencement Requirements, with defined parameters, monitoring obligations and effective enforcement mechanisms, such that the development consented corresponds to the development assessed. In the absence of such secured controls, the Environmental Statement cannot be relied upon as an accurate assessment of the likely significant effects of the Proposed Development.

9. Cumulative Impact on affected rural communities

The application tends to address impacts in topic-specific silos. However, for residents of Hail Weston, Great Staughton, Little Staughton, Pertenhall, Keysoe and Swineshead, the relevant planning question is not whether each individual topic can be described in isolation as manageable, but what the combined and overlapping effects of those impacts would be over the life of the project. When considered cumulatively, the effects of the Proposed Development would be substantially greater than the sum of their individual parts.

Across these settlements, the Proposed Development would give rise to a combination of:

• sustained construction traffic on a limited number of rural corridors, including the B645 and connecting routes, with heavy vehicle movements concentrated through or in proximity to small villages;

• direct effects on residential receptors, including frontage properties, arising from noise, vibration, road safety risk and impaired access;

• the foreseeable risk of rat-running and displacement of traffic onto unsuitable minor roads and village streets;

• the long-term industrialisation of a predominantly agricultural landscape that currently contributes to the rural setting and identity of these communities;

• uncertainty regarding the adequacy of BESS safety assessment, including emergency access and response capability across a dispersed rural area;

• uncertainty as to whether the BESS would in practice operate as storage for on-site renewable generation or as a wider bidirectional grid-charged balancing asset;

• uncertainty regarding long-term residential amenity, including operational noise, lighting and cumulative landscape effects;

• uncertainty regarding restoration, decommissioning and the securing of long-term liabilities affecting land across the Order Limits;

• uncertainty regarding the true extent of lifecycle emissions and the weight that can properly be given to the Applicant's claimed carbon benefit; and

• reduced confidence in safe and compliant implementation arising from the absence of any evidenced delivery capability or contractor competence case.

These impacts do not arise independently. The same communities likely to experience concentrated construction traffic are also those most affected by landscape change, visual effects and the long-term operational presence of the scheme. Similarly, deficiencies in the draft

Development Consent Order compound the significance of those impacts by reducing confidence that the mitigation relied upon in the Environmental Statement will be consistently delivered and enforced.

The cumulative effect is therefore one of prolonged disruption, uncertainty and erosion of rural amenity across a network of small settlements, which, when experienced together rather than in isolation, materially exceeds the level of impact suggested by topic-specific assessment. These are not locations with the capacity or resilience of larger urban areas. They are small rural communities whose character depends on tranquillity, agricultural setting, manageable traffic conditions and confidence in the long-term stability of their environment.

During Issue Specific Hearing 2, broader concern was also raised regarding the cumulative and geographically concentrated loss of agricultural land associated with multiple large-scale solar schemes. This reinforces the need to consider not only national-scale metrics but also the spatial concentration of impacts within particular areas, especially where high-quality agricultural land is disproportionately affected within a relatively confined rural geography.

The scale of cumulative change within the wider area was also highlighted during the Open Floor Hearing, including the interaction of this proposal with other major infrastructure projects. This underlines the importance of a genuinely integrated cumulative assessment, rather than one that considers impacts in isolation or relies on fixed assumptions about surrounding development.

In my submission, the cumulative impact on these affected villages is a matter to which the Examining Authority should attach significant weight. Even where individual topic areas are said to be capable of mitigation in principle, the combined effect of traffic, land-use change, safety risk, amenity loss and long-term uncertainty would fundamentally alter the character and liveability of these communities over a prolonged period.

That effect is further intensified where, as identified during Issue Specific Hearing 1, key controls and mitigation measures are not fully secured within the Development Consent Order. The interaction between substantive impacts and uncertainty in their control materially increases the weight that should be given to cumulative effects in the planning balance.

10. Procedural confidence and deliverability

A further concern arising from the application as a whole is the extent to which key matters are deferred to post-consent stages. This is not a matter of drafting but of evidential adequacy and decision-making confidence. It goes directly to whether the Examining Authority can be satisfied that the development has been properly assessed and can be implemented with acceptable and enforceable levels of control. Taken together, these factors introduce a level of uncertainty that is not consistent with the degree of confidence required to support a recommendation for development consent.

I note that during Issue Specific Hearing 1 similar concerns were raised regarding the extent to which key aspects of the scheme are deferred to later stages, including matters affecting environmental mitigation, operational controls and lifecycle management. This demonstrates the need to distinguish between matters of detailed design and those that go to the assessment of likely significant effects and must therefore be resolved and secured at the point of consent.

Across a number of core topics including construction traffic, BESS safety, residential amenity, decommissioning and restoration, the application relies on future plans, future approvals or future design development rather than clearly defined and enforceable parameters at the point of decision. In some cases, impacts are assessed on the basis that mitigation will be defined later; in others, control is deferred to outline plans without fixed performance standards or measurable thresholds.

Issue Specific Hearing 2 also highlighted a number of interrelated uncertainties concerning site selection, land quality, soil impacts and cumulative effects, including the extent to which these matters are driven by project-specific constraints rather than by a demonstrated lack of reasonable alternatives. Those uncertainties are directly relevant to the planning balance and to the question whether the adverse impacts of the Proposed Development have, in accordance with national policy, been properly avoided, reduced or minimised.

This is not a theoretical concern. The Examining Authority has expressly stated at the Preliminary Meeting that the examination will be evidence-led and that conclusions will be based on "facts and sound evidence rather than speculation or opinion". Where key aspects of the scheme remain undefined or reliant on future submissions, the evidential basis required for decision-making is not yet in place.

This approach gives rise to three fundamental difficulties. First, it prevents the Examining Authority from concluding that the likely significant effects of the development have been fully and properly assessed. Second, it prevents reliance on the mitigation assumed in the Environmental Statement, as that mitigation is not secured. Third, it amplifies the effect of identified deficiencies in the underlying assessments, including inconsistencies and optimistic assumptions, by deferring control to later stages.

In my experience of major infrastructure projects, the quality and completeness of the application documentation is itself an important indicator of delivery risk. A project that is sufficiently mature for consent should be accompanied by a coherent package of evidence, fixed assumptions and enforceable controls. Where the application instead depends on narrative assurances and future discretion, confidence in both assessment and implementation is materially reduced.

This issue is particularly acute in a project with:

- a long operational life;
- multiple interacting environmental and community impacts;
- a reliance on rural roads and sensitive receptors;
- major-accident considerations associated with the BESS; and
- long-term restoration and financial security risks.

In those circumstances, the Examining Authority is not being asked to approve a defined and controlled project, but a framework within which material aspects would be determined later.

Such an approach may be acceptable for subsidiary matters. It is not acceptable where the deferred matters go to the assessment of likely significant effects, community protection and long-term liability.

The cumulative effect of this procedural deferral is that the scheme, as currently presented, cannot be regarded as sufficiently evidenced, defined or controlled to justify development consent. For a project of this scale and duration, that absence of certainty goes directly to the robustness and lawfulness of the decision-making process.

10.1 Delivery capability, contractor competence and implementation risk

A further and important dimension of deliverability, which is not addressed within the Application, is the absence of any evidence as to the identity, capability or track record of the contractors and specialist subcontractors who would be responsible for delivering the Proposed Development. For a project of this scale and risk profile, that omission is not merely informational; it is material to the evidential basis for concluding that the scheme can be safely and reliably delivered.

The Application provides no information regarding:

- the likely Engineering, Procurement and Construction (EPC) contractor(s);
- specialist contractors responsible for high-voltage electrical works;
- suppliers and integrators of the Battery Energy Storage System (BESS); or
- the health and safety performance, technical capability or delivery record of any such parties.

While it is recognised that detailed contractor appointments are not always finalised at the point of application, the complete absence of any evidence as to delivery capability is notable in the context of a project of this scale, complexity and risk profile.

This is not a standard or low-risk development. The Proposed Development comprises:

- a large-scale, multi-phase construction programme across a constrained rural environment;
- significant high-voltage electrical infrastructure and grid connection works; and
- a grid-scale BESS, which introduces inherently higher-consequence safety risks, including thermal runaway, fire and hazardous emissions.

In such circumstances, delivery capability is not a neutral or interchangeable matter. The competence, experience and safety culture of the delivery chain are integral to the assessment of risk and the credibility of mitigation, particularly in relation to:

- construction traffic management and adherence to routing assumptions;
- installation quality and system integrity;
- BESS safety, including fire prevention, containment and emergency response; and
- implementation of environmental mitigation relied upon in the Environmental Statement.

The Application proceeds on the basis that these matters can be controlled through plans and post-consent approvals, without evidencing that suitably competent delivery partners will be responsible for implementing those controls.

This creates a material disconnect between:

- the impacts assessed in the Environmental Statement; and
- the practical ability to deliver the mitigation on which those assessments depend.

In my professional experience of delivering nationally significant infrastructure projects, the credibility of an Environmental Statement is inseparable from the capability of the delivery chain. A project of this nature would normally be supported, at minimum, by evidence of:

- experience in delivering comparable solar and/or BESS infrastructure;
- demonstrable health and safety performance;
- familiarity with rural construction constraints and community protection measures; and
- the ability to implement complex, safety-critical systems in accordance with design assumptions.

No such evidence is provided.

This is particularly material in the context of the BESS, where safe operation depends not only on equipment specification but on installation quality, integration, commissioning and operational management, all of which are contractor-dependent. Similarly, the effectiveness of construction traffic controls, which are central to the assessment of impact on Hail Weston, depends on consistent implementation by contractors and suppliers across a dispersed and multi-year programme.

The absence of any evidenced delivery capability therefore supports the broader concern identified in this Written Representation: that the Application relies extensively on assumed compliance with mitigation measures, without demonstrating that such compliance is deliverable in practice.

This concern is compounded by the wider structure of the Application, which defers a substantial proportion of detail to post-consent stages. In the absence of defined delivery partners, this approach places disproportionate reliance on future contractor behaviour, without evidencing that such reliance is justified.

In practical terms, the Application presents a design-led case without an evidenced delivery case.

For a project of this scale, duration and risk profile, that is a material deficiency. It reduces confidence that:

- impacts will be managed in accordance with the assessment;
- safety-critical systems will be delivered to an appropriate standard; and
- mitigation secured through the DCO will be implemented effectively over time.

When considered alongside the identified deficiencies in traffic assessment, BESS risk evaluation, lifecycle carbon analysis and DCO controls, the absence of any demonstrated delivery capability materially undermines confidence in the scheme as a whole.

This is a material matter. It goes directly to whether the Examining Authority can conclude that the Proposed Development is deliverable, safe and capable of being implemented as assessed. The absence of any evidence as to delivery partners or contractor competence further undermines confidence that the scheme, as assessed, is capable of being safely and reliably implemented in practice. Similar concerns were also raised during the Open Floor Hearing, where it was observed that elements of the assessment rely on information to be provided or confirmed post-consent, rather than being fully resolved at the point of examination. This reinforces a central question for the Examining Authority: whether the likely significant effects of the Proposed Development have been fully identified, robustly assessed and demonstrably controlled on the basis of the information currently before the Examination. Accordingly, this issue should be afforded significant weight in the overall planning balance.

In those circumstances, the Application does not provide a sufficient evidential basis on which the Examining Authority can be satisfied that the likely significant effects of the Proposed Development have been properly assessed or that those effects would be acceptably controlled in practice.

11. Overall Conclusions and Requested Actions

For the reasons set out in my Relevant Representation and expanded upon in this Written Representation, I respectfully submit that the application has not demonstrated that this particular scheme is appropriately sited, proportionate in its impacts, or capable of being delivered with the degree of certainty and control that a project of this scale requires.

My concerns are not directed to renewable energy in principle. They arise from the combination of:

- a limited and insufficiently evidenced case on actual national benefit and proportionality;
- a substantial and long-duration land take affecting productive agricultural land;
- concentrated and potentially severe construction traffic impacts on Hail Weston;
- inadequate assessment and control of BESS-related major-accident risk;
- a greenhouse gas assessment whose claimed carbon benefit is subject to material uncertainty and internal inconsistency;
- insufficient certainty on residential amenity protection;
- absence of robust and secured financial mechanisms for decommissioning and restoration;
- a draft DCO that defers material matters to post-consent approval rather than securing them through clear and enforceable Requirements; and

- absence of any evidenced delivery capability sufficient to demonstrate that the scheme can be implemented to the standard assumed in the Application.

Taken together, these matters give rise to a clear and serious concern that the proposal has not been demonstrated, on the evidence presented, to be acceptable in planning, environmental or deliverability terms.

Accordingly, I respectfully request that the Examining Authority:

- give significant weight to the local and cumulative impacts on Hail Weston and nearby residents;
- attach limited weight to the Applicant's reliance on installed capacity and procedural NSIP status as indicators of national benefit;
- require further evidence where material gaps remain, including transport impacts, BESS safety, alternatives to BMV land take, residential amenity protection, and decommissioning and restoration obligations, supported by transparent and verifiable analysis;
- require the Applicant to provide a corrected, transparent and sensitivity-tested greenhouse gas assessment, including reconciliation of stated assumptions to reported outputs;
- require the Applicant to clarify and assess the intended operational model of the BESS, including whether bidirectional grid charging from non-renewable or mixed grid sources will be permitted, and the implications for carbon benefit and system value;
- attach reduced weight to the Applicant's claimed carbon benefit unless and until that assessment is corrected and independently verifiable;
- require evidence of delivery capability, including contractor competence and the practical implementation of mitigation;
- ensure that any mitigation relied upon in the Environmental Statement is secured through binding, enforceable and, where appropriate, pre-commencement Requirements;
- require explicit No-Go / No-Through traffic controls for Hail Weston and other unsuitable local routes, with robust monitoring and enforcement mechanisms;
- require time-based HGV restrictions during school peak periods, informed by consultation with local schools and transport providers, to ensure that construction traffic does not conflict with school transport movements on constrained rural roads;
- require a fully defined and secured framework for BESS safety, risk assessment, emergency response and environmental protection prior to commencement;
- require a ring-fenced and enforceable financial security mechanism sufficient to guarantee full decommissioning, infrastructure removal and restoration; and

- consider, in the overall planning balance, whether the proposal has been shown to be a proportionate and justified means of contributing to national energy objectives at this particular location.

Absent substantial additional and properly tested evidence and enforceable controls, the application does not provide the level of certainty required for the grant of development consent under the Planning Act 2008 and the EIA Regulations.

The relevant question for the Examining Authority is not whether the proposal might in principle be capable of being made acceptable at some later stage, but whether it has been demonstrated to be acceptable on the evidence currently before the Examination.

Drawing these matters together, the central difficulty for the Proposed Development is not the presence of harm in any single topic area, but the absence of a sufficiently evidenced, transparent and reliable case that those harms are necessary, proportionate or capable of being effectively controlled.

The Applicant relies on installed capacity and procedural NSIP status as indicators of national benefit, yet the evidence on actual energy delivery, lifecycle carbon performance and system value remains uncertain and, in material respects, internally inconsistent. At the same time, the scheme would result in the long-term use of a substantial area of Best and Most Versatile agricultural land, without a robust and comparative assessment demonstrating that such land take is unavoidable in the context of reasonable alternatives.

These substantive concerns are compounded by deficiencies in the assessment and control of construction traffic, BESS-related operational and safety risks, residential amenity and long-term restoration, together with a draft DCO that does not secure the mitigation relied upon through clear and enforceable Requirements and instead defers key matters to post-consent approval.

In combination, these factors give rise to a material level of uncertainty as to both impact and deliverability. In planning terms, that uncertainty is not neutral and weighs against the proposal, particularly where the claimed benefits are themselves subject to question.

A further concern arises from the manner in which the Application seeks, in effect, to rely on general policy support for low-carbon energy as a substitute for project-specific evidence. National policy support does not remove the requirement for a scheme to be fully evidenced, proportionate and demonstrably controlled on the facts of the particular case.

In this case, a substantial proportion of the detail necessary to assess and control the scheme is deferred to post-consent stages. The effect is to transfer key elements of design definition and impact control from the examination phase, where they are subject to scrutiny, to the post-consent phase, where they are not, creating a material risk that the development as delivered may differ from that assessed.

The practical consequence of this approach is that a number of material issues have required detailed interrogation by members of the public and other interested parties in order to understand the likely effects of the Proposed Development. That is not the intended function of the Examination process, nor is it consistent with the Applicant's responsibility to present a complete and intelligible case.

Under the EIA Regulations, the Applicant is required to provide a sufficiently complete, transparent and verifiable assessment of likely significant effects to enable the decision-maker to reach a reasoned conclusion. Where key elements of that assessment are unclear, internally inconsistent or dependent on assumptions that are not explained, the burden of interpretation is effectively displaced onto third parties, including affected communities.

In this case, matters including construction traffic realism, BESS operational characteristics, lifecycle carbon assumptions and decommissioning security require analysis beyond the face of the Application in order to understand their implications in real-world conditions. This indicates not simply a difference of opinion, but a lack of clarity, completeness and practical testing in the information provided.

The result is that elements of the scheme must be inferred or reconstructed through third-party analysis, rather than being clearly and transparently presented by the Applicant at the outset. In planning terms, that position is not neutral. It reduces confidence that the likely significant effects have been fully and properly assessed, and materially limits the weight that can be placed on the conclusions presented.

This issue is particularly important in the context of major infrastructure projects. Development consent carries material value and such projects are frequently subject to sale, transfer or refinancing. Where controls are not secured within the DCO at the point of consent, they cannot be assumed to bind future owners or delivery structures in the same way, nor to be implemented to the standard assumed at examination.

The consequence is that uncertainty and risk are transferred away from the Applicant and onto affected communities and future stakeholders. This is especially material in relation to decommissioning and restoration. If these matters are not secured at the point of consent, there is a foreseeable risk that liabilities may be reduced, deferred or externalised over time, including to parties with no involvement in the original development decision.

For a project of this scale, it is essential that restoration is secured in full, without cost or detriment to future generations, and to a standard equivalent to the current agricultural use of the land. On the evidence currently before the Examination, that level of safeguard has not been demonstrated.

The Applicant's case ultimately depends on a claimed carbon benefit that is neither robustly quantified nor reliably evidenced. Set against the permanent and extensive use of Best and Most Versatile agricultural land, and the absence of any demonstrated necessity for that land take, there is no adequate basis on which to conclude that the benefits of the Proposed Development clearly and convincingly outweigh its environmental, agricultural and community impacts.

In those circumstances, and on the evidence currently before the Examination, the statutory tests for development consent are not met. Development consent should therefore be refused.

I reserve the right to make further submissions in response to any written or oral representations made in respect of this document, and to address any additional or late evidence submitted by the Applicant during the Examination.

APPENDIX A - Ford End Road: Photographic evidence of physical constraints, flood risk and unsuitability for construction traffic

Access regularly restricted due to flooding, demonstrating unreliable passability and constraint on route availability.

Road surface condition showing degradation and limited structural capacity, unsuitable for sustained HGV or construction traffic.

Standing water and pooling associated with inadequate drainage and maintenance, increasing safety risk and reducing usable carriageway width.

Ford crossing at Hail Weston, prone to regular flooding and temporary closure, presenting a foreseeable obstruction to vehicle movement and emergency access.

APPENDIX B - No-Go / No-Through routing

This Appendix provides visual clarification of the routing assumptions relied upon in the Transport Assessment and identifies those routes which must be subject to enforceable No-Go / No-Through controls in order for the assessed impacts to remain valid.

Figure B1 – Hail Weston: Local road network and required No-Go / No-Through controls

Properties fronting B645 St Andrew's Church (Grade I listed building)

Figure B1 identifies the local road network within Hail Weston and those routes which must be subject to explicit No-Go / No-Through restrictions for all categories of project traffic, including High Street, Green Lane, Bird Lane and Ford End Road. It also identifies those properties most at risk from traffic impacts given frontage to B645

These routes are constrained by limited carriageway width, frontage residential access, pedestrian use and, in the case of Ford End Road, flood risk and structural limitations.

The designation of these roads as No-Go / No-Through routes is necessary to ensure that the routing assumptions relied upon in the Transport Assessment are capable of being achieved in practice.

Figure B2 - Ford End Road: Full extent and physical constraints

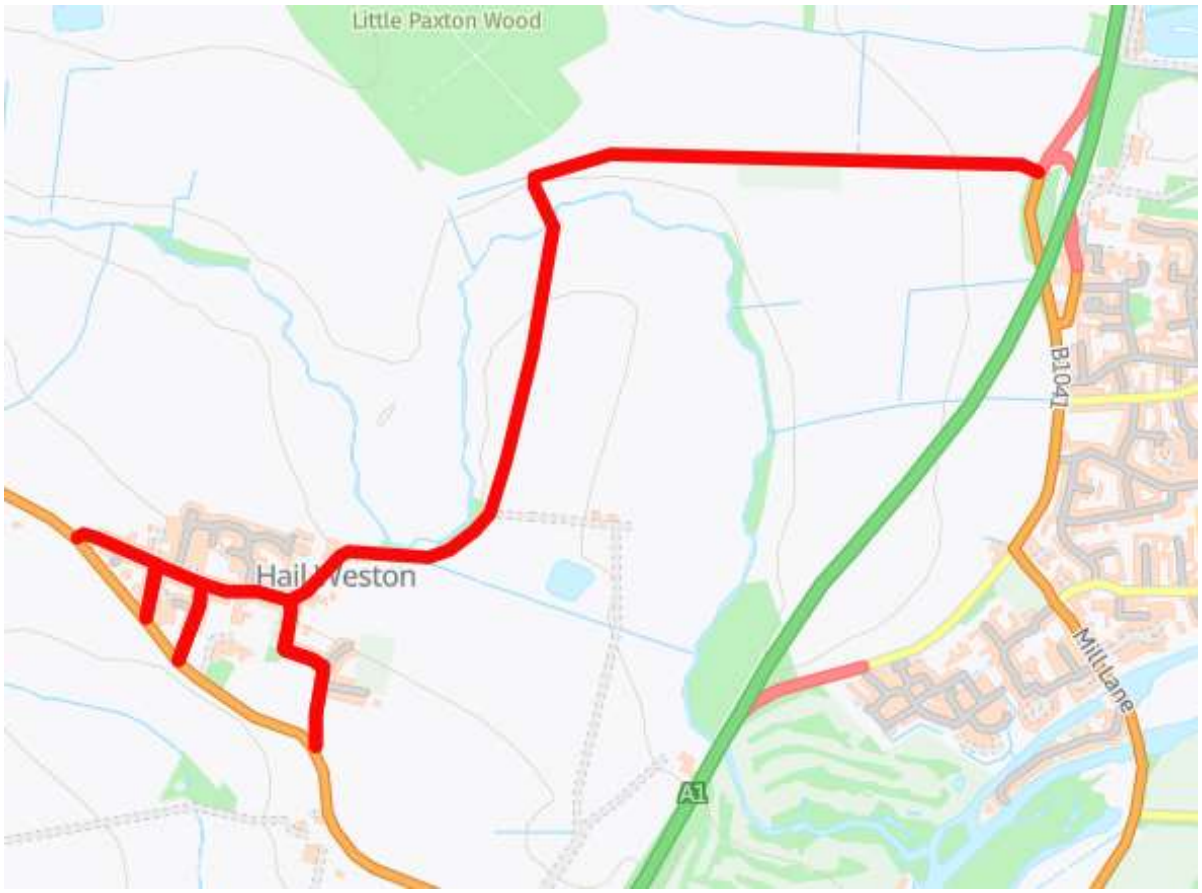


Figure B2 illustrates the full extent of Ford End Road between Hail Weston and the Little Paxton / A1 connection, demonstrating its function as a narrow rural lane with constrained geometry, poor surface condition and a flood-prone ford crossing.

The route is unsuitable for construction traffic and presents a high risk of vehicle conflict, obstruction and diversion onto even less suitable minor roads.

Figure B3 – A1 / B645 Junction and surrounding network constraints

Figure B3 shows the A1/B645 junction and surrounding local network, including constraints associated with the Eaton Ford crossing and the Great North Road corridor.

Construction traffic routing should explicitly prohibit:

• use of the weight-restricted bridge at Eaton Ford;

• routing via Great North Road for southbound access to the A1; and

• any movements that would introduce construction traffic into constrained residential or urban routes not assessed within the Transport Assessment.

These restrictions are necessary to prevent displacement of traffic impacts onto unsuitable routes and to ensure consistency with the Applicant's assessed routing assumptions.