Local Impact Report – East Park Energy DCO

Project: East Park Energy

Applicant: BSSL Cambsbed 1 Limited

PINS Ref: EN010141

April 2026

Contents

1. INTRODUCTION

1.1 This report constitutes the Local Impact Report (LIR) by Huntingdonshire District Council (referred to in the remainder of this report as HDC or 'the Council'), for the East Park Energy project (referred to in the remainder of this report as the proposed development or the Scheme).

1.2 HDC is one of three Host Authorities, the other two being Cambridgeshire County Council and Bedford Borough Council. For clarity, each authority will be submitting separate LIRs covering the impacts specific to their administrative area, technical specialisms and/or statutory functions. HDC has coordinated with Cambridgeshire County Council and Bedford Borough Council to ensure all three LIRs collectively provide a complete assessment of the project's impacts.

1.3 The three host authorities have engaged in a Memorandum of Understanding (03.06.2024) to enable discussions between the local planning authorities, enable joint discussions with the Applicant, and enable the appointment of External Consultants to act on behalf of the three Host Authorities to assess certain aspects of the Application and make representations to the Examination.

1.4 In preparing this LIR, the Council has had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended) and the government's guidance 'Nationally Significant Infrastructure Projects: advice for Local Authorities'.

1.5 HDC is aware of community and public concerns regarding the potential impacts of the development, some of which may overlap with technical matters within HDC's remit, as well as those addressed by other statutory bodies or falling beyond HDC's scope. HDC is not required to carry out its own consultation with the community (including Parish Councils) or external Statutory Consultees such as the Environment Agency or Natural England. The community has had the opportunity through the Applicant's consultation process and examination process to make their observations known. Statutory Consultees will also be involved through the examination process.

1.6 The Council's views on the Development Consent Order (DCO) articles, requirements and obligations are considered, including views on specific mitigation or compensation measure. HDC would be responsible for enforcing certain provisions and requirements as set out in the DCO.

1.7 The Cabinet of Huntingdonshire District Council formally considered the East Park Energy project in its role as a statutory consultee and Host authority at its meeting held on 10th September 2024. The Cabinet delegated authority to the Chief Planning Officer, in consultation with the Leader and Executive Councillor for Planning to take all associated action necessary in the interests of the efficient and timely conduct of the Council's compliance with the DCO.

2. PURPOSE AND STRUCTURE OF THE REPORT

2.1 This report does not describe the proposed development itself but relies on the Applicant's detailed description of the development, as set out in ES Vol 1 Chapter 2: The Scheme **[APP-038]**.

2.2 Section 60 (3) of the 2008 Planning Act defines the purpose of Local Impact Reports as: *"a report in writing giving details of the likely impact of the proposed development on the authority's area."*

2.3 The LIR will assist the Examining Authority by identifying local issues and including an appraisal of the development's compliance with local policy and guidance. The report sets out the positive, neutral, and negative local impacts but does not need to carry out a balancing exercise.

2.4 The report pulls together technical input from internal officers and external consultants on the following topic areas:

- Public Protection (including noise, vibration, air quality and ground conditions)
- Historic Environment (Above-Ground Heritage Assets only)
- Landscape and Visual Impact
- Arboriculture
- Ecology and Biodiversity
- Land and Soils
- Socio-economics, land use and tourism
- Climate change

2.5 The report is presented under topic-based headings. Within each section, the principal issues are identified and the positive, neutral and negative local impacts are set out with reference to the submitted application documents, including the Environmental Statement (ES) and the Draft DCO (articles, requirements and obligations).

3. KEY POLICIES AND DOCUMENTS

Development Plan

3.1 Whilst not determinative under the Planning Act 2008, the Examining Authority can consider other important and relevant matters, including national and local planning policy. The local policies that HDC considers of relevance to this application are highlighted below and should be considered as important and relevant to the determination of the application.

3.2 In Huntingdonshire the Development Plan (relevant to this project) consists of:

- Huntingdonshire's Local Plan to 2036 (2019)
- Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)
- Great Staughton Neighbourhood Plan (2021 to 2036)

3.3 **Huntingdonshire's Local Plan to 2036**

- LP 2: Strategy for Development

- LP 3: Green Infrastructure
- LP 5: Flood Risk
- LP 10: The Countryside
- LP 11: Design Context
- LP 12: Design Implementation
- LP 14: Amenity
- LP 15: Surface Water
- LP 16: Sustainable Travel
- LP 17: Parking Provision and Vehicle Movement
- LP 29: Health Impact Assessment
- LP 30: Biodiversity and Geodiversity
- LP 31: Trees, Woodland, Hedges and Hedgerows
- LP 34: Heritage Assets and their Settings
- LP 35: Renewable and Low Carbon Energy
- LP 36: Air Quality
- LP 37: Ground Contamination and Groundwater Pollution

3.4 **Great Staughton Neighbourhood Plan (2021 to 2036)**

- GSNP 7 – Landscape and Townscape Characteristics
- GSNP 9 – Great Staughton Conservation Areas
- GSNP10 – Designated and Non-Designated Heritage Assets
- GSNP 11 – Biodiversity and Wildlife Habitats
- GSNP 13 – Community-Led Renewable Energy Projects
- GSNP 15 – Surface Water Flood Risk
- GSNP 17 – Road Safety and Parking

3.5 **Supplementary Planning Documents (SPDs)** and other relevant guidance:

- Landscape and Townscape SPD (2022)
- Cambridgeshire Flood and Water SPD (2017)
- Developer Contributions SPD (2011)
- Developer Contributions: Updated Costs 2025/2026
- Huntingdonshire Strategic Flood Risk Assessment (2025)
- Technical Advice Note: Environmentally Sustainable Design and Construction (2025)

National Policy and Legislation

3.6 National Policy Statements (NPS)

- NPS EN-1 – Overarching National Policy Statement for Energy
- NPS EN-3 – National Policy Statement for Renewable Energy Infrastructure
- NPS EN-5 – Electricity Networks Infrastructure

3.7 The Planning (Listed Buildings and Conservation Areas) Act 1990, , the National Design Guide 2021, the Town and Country Planning Act 1990 (as amended) and the Environment Act 2021 are also relevant where applicable.

Emerging Local Plan

3.8 In October 2025, the Council issued its Preferred Options consultation on the emerging Local Plan. Paragraph 49 of the National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework.

3.9 At the time of writing, the emerging Local Plan remains at an early stage, meaning that little, if any, weight can currently be attributed to the Preferred Options document. This position may evolve as responses to the consultation are received, collated, and published. Later stages in the DCO process may mean that greater weight is given to emerging policies.

3.10 The latest updates on the Draft Local Plan to 2046 are on HDC's website.

Other Local documents/policy

3.11 Huntingdonshire District Council Corporate Plan 2023 – 2028

3.12 HDC's Climate Strategy and Action Plan (2023)

3.13 Huntingdonshire Futures Place Strategy (March 2023)

3.14 Huntingdonshire Economic Growth Strategy (2025 – 2030)

4. DESCRIPTION OF THE SITE AND SURROUNDING AREA

4.1 The proposed development is located within the southern part of HDC's administrative area (Sites C and D, together with the cable corridors connecting to Site B and the substation located within Bedford Borough Council's administrative boundary), as shown on the Order Limits Plan **[APP-007]**. The surrounding area is predominantly rural and agricultural, with several small villages situated close to the proposed development, including Great Staughton and Hail Weston. The largest settlement is St Neots, immediately to the east of the Site. Beyond these settlements, there are scattered individual properties and farmsteads, including some in close proximity to the Site.

4.2 Several existing and consented solar farms lie near the Site, including Little Staughton Airfield (approximately 1.2 km south-west of Site C) and High Wood to the west of Hail Weston (approximately 0.1 km south of Site D). These developments have already contributed, and will continue to contribute, to cumulative effects on the rural character, landscape, and habitats of the area when considered alongside the proposed development.

4.3 HDC does not disagree with the Applicant's description of the Site and its surrounding context as set out in Section 3.2 of the Planning Statement **[APP-031]** and is content to rely on that description.

5. PLANNING HISTORY

5.1 HDC is satisfied that the relevant planning history within the Order Limits is appropriately set out in Appendix A: Relevant Planning History of the Planning Statement **[APP-031]**. In addition, the Council has identified further recent applications of relevance, as well as updates to the progress of applications already listed. All applications are publicly available on Public Access using the reference number.

5.2 The following application is included in the Applicant's list, but its status has since been updated:

- 25/00891/FUL – Land At Eastern Edge Of Little Staughton Solar Farm, Little Staughton Airfield, Little Staughton – Change of use to operational land, extension to existing substation alongside fencing and associated works – Permission Granted 26.09.2025

5.3 The following applications are not included in the Applicant's list but are considered relevant to the Scheme:

- 25/80286/COND – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Discharge of conditions 11 (Traffic Management Plan), 20 (PROW Protective Measures), 24 (Soil Management) and 27 (Skylark Mitigation) of permission 22/01813/FUL – Approved 22.12.2025
- 25/02081/S73 – The Orchard, Garden Farm, The Town, Great Staughton, St Neots, PE19 5BE - Variation of Condition 1 (Approved plans) for 24/02336/S73 relating to Condition 2 for permission 17/00764/FUL S73 approval – Approved 28.01.2026
- 24/02336/S73 – The Orchard, Garden Farm, The Town, Great Staughton, St Neots, PE19 5BE – Variation of Condition 2 (Approved plans) and Condition 9 (Hours of deliveries or dispatches) for 17/00764/FUL – Approved 25.02.2025
- 26/00313/S73 – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Variation of condition 2 (approved plans) of 22/01813/FUL (Installation of solar farm (generating up to 50MW) comprising the provision of photovoltaic panels, inverters, switchgear housings and transformer stations together with hardstanding, landscaping, access alterations, fencing and associated works) – Pending Consideration
- 26/80081/COND – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Discharge of condition 13 (WSI) of 22/01813/FUL (installation of solar farm comprising the provision of photovoltaic panels, inverters, switchgear housings and transformer stations together with hardstanding, landscaping, access alterations, fencing and associated works) – Pending Consideration
- 26/80043/COND – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Discharge of Conditions 5 - Final Details, 14 -

AMP, 15 - Soft Landscaping Scheme, 17 - PRoW Plans, 19 - Permissive Path, 21- Trees, 22- Arb Method Statement, 23- Drainage, 25 - CEMP, 26 - LEMP of permission 22/01813/FUL – Pending Consideration

6. CONSIDERATION OF LOCAL IMPACTS

6.1 The ES and supporting documentation sets out a wide-ranging assessment of the proposed development, its impacts and proposed mitigation measures. HDC accepts that the chapters of the ES address the range of issues that are of a local concern to the authority. The following section sets out the Council's view of the local impacts of the development. It should be noted that this only comments on impacts where HDC has a statutory function or holds technical expertise relevant to the assessment of the project.

6.2 HDC consider the key considerations and local impacts in relation to this project are:

- Principle of development
- Landscape and Visual Impact
- Ecology and Nature Conservation
- Biodiversity Net Gain
- Heritage Impacts
- Amenity, including impacts from noise and vibration, air quality and contamination
- Land and Soils
- Socio-economics, land-use, and tourism
- Climate change

Principle of development

6.3 This section is concerned with the broad principle of development for a renewable or low carbon energy generating scheme in the countryside. More detailed, site-specific matters are considered elsewhere in the report.

6.4 The Council accepts that there is a compelling need, as a matter of principle, to increase renewable energy generation and consumption to support the Government's national agenda to reach net zero carbon by 2050.

6.5 The application site is located outside a built-up area and is therefore considered to be within the countryside for planning purposes wherein Policy LP10 of Huntingdonshire's Local Plan to 2036 applies. Policy LP10 restricts development in the countryside to the limited and specific opportunities as provided for in other policies of the Local Plan. The supporting text Policy LP10 notes that this is in order to balance support for a thriving rural economy and land-based business, while protecting the character and beauty of the countryside.

6.6 Of particular relevance in this instance is Policy LP35 which states that *"a proposal for a renewable or low carbon energy generating scheme, other than wind energy,*

will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable".

6.7 As set out in paragraph 8.52 of the Local Plan, these impacts will include, but are not limited to:

- any on the surrounding environment
- amenity, and in particular impacts from noise and air quality
- heritage assets and/ or their settings
- biodiversity
- landscape

6.8 As stated above, Policy LP35 provides support in principle for renewable and low carbon energy generation and is therefore considered to be one of the specific opportunities for development in the countryside supported in the Local Plan, subject to a detailed assessment of the proposed development and its impacts. In terms of the countryside location, and notwithstanding further assessment in respect of the use of agricultural land, it is considered there is in-principle policy support for the development in this location.

6.9 Policy LP10 states:
"All development in the countryside must:
a. seek to use land of lower agricultural value in preference to land of higher agricultural value:
i. avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and
ii. avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land;
b. recognise the intrinsic character and beauty of the countryside; and
c. not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others."

6.10 The supporting text for Policy LP10 at paragraph 4.112 of the Local Plan states: "*Agricultural land is a valuable asset in itself as it contributes to the local and national economy and assists with food security. Huntingdonshire's agricultural land is almost entirely of good quality: 98% is classed as grades 1, 2 or 3. 15% is grade 1 (excellent quality) which is concentrated in the north east of the district, mainly in the Fens with a few pockets along the Ouse Valley. A proposal involving built development on agricultural land should demonstrate that it is located on the lowest grade agricultural land suitable and available within the vicinity which is also compatible with other sustainability objectives. Development should avoid use of grade one agricultural land.*"

6.11 The Applicant has carried out an Agricultural Land Classification and Soil Resources survey ES Vol 2 Appendix 13-1: Agricultural Land Classification and Soil Resources **[APP-115]** which has informed the assessment of likely significant effects within ES Vol 1 Chapter 13: Land and Soils **[APP-150]**. The survey area

extended to 738.8ha in total, comprising four main panel areas and a cable route (paragraph 2.1 of **APP-115**).

6.12 The ALC survey states that the Site comprises a mix of Grade 2 (very good), Grade 3a (good) and Grade 3b (moderate) agricultural land:

- Grade 2 – 163.6. ha (22%);
- Grade 3a – 354.4 ha (48%);
- Grade 3b – 185.2 ha (25%);
- Non-agricultural – 35.6 ha (5%)
- Non surveyed – 41.6 ha

6.13 Land described as 'not surveyed' comprised 22.4 ha of land between Areas A and B proposed for Landscaping and Green Infrastructure where no disturbance of the soil resource would occur (within BBC boundary); 5.7 ha of cable corridor between Areas C and D with no survey access (within HDC boundary); and 13.5 ha of land with no survey access around the existing substation (within BBC boundary).

6.14 The proposed development does not involve the use of Grade 1 agricultural land. However, 518ha (74%) of the site constitutes BMV land (Grades 2 and 3a). Policy LP10 seeks to avoid the irreversible loss of such land where possible and encourages the use of lower-grade land in preference to higher-grade land.

6.15 While the majority of the BMV land would be capable of reinstatement following the 40-year operational period, certain components of the scheme—including the BESS compound, substation, access tracks, and new woodland and hedgerow planting—would result in localised, permanent loss of agricultural land. It is in respect of these permanent elements that a degree of conflict with Policy LP10 arises.

6.16 There is no broader conflict with LP10 in principle, as the temporary use of BMV land does not constitute irreversible loss and can be appropriately managed through mitigation and restoration measures secured via the Outline Soil Management Plan **[APP-161]** in the draft DCO **[PDA-005]**.

6.17 The Great Staughton Neighbourhood Plan includes Policy GSNP13, which supports community-led renewable energy projects. As the proposed development is not community-led, this policy is not considered relevant to the assessment of this scheme.

6.18 Overall, the proposed development attracts limited negative weight in respect of the principle of development, specifically relating to the permanent loss of BMV land associated with certain elements of the scheme, as outlined above. Detailed impacts are assessed further in the topic-specific sections of this report.

Landscape and Visual Impact

6.19 It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. The assessment of landscape and visual impacts has been carried out on a combined basis across the full study area and does not, for example, distinguish visual receptors by administrative boundary. As a result, some receptors and conclusions reported here may fall outside Huntingdonshire's administrative boundary but are included for completeness. Accordingly, elements of this assessment may also appear within the LIRs submitted by the other Host Authorities.

Relevant Development Plan policy:

6.20 Policy LP10b. of Huntingdonshire's Local Plan to 2036 states that development in the countryside must recognise the intrinsic character and beauty of the countryside.

6.21 Policy LP35 of Huntingdonshire's Local Plan to 2036 supports proposals for renewable energy where all potential adverse impacts, including cumulative impacts, are or can be made acceptable. When identifying and considering landscape and visual impacts regard should be had to the Huntingdonshire Landscape and Townscape Assessment SPD (2022). Pages 98 – 103 of the aforementioned document covers the Southern Wolds Landscape Character Area which is most relevant to the assessment of the Scheme.

6.22 Policy GSNP7 of the Great Staughton Neighbourhood Plan (2021 to 2036) requires as appropriate to their scale, nature and location, development proposals must recognise, maintain and where possible enhance the existing landscape and settlement character in Great Staughton parish as set out in the Great Staughton Landscape and Townscape Assessment 2023.

Summary:

6.23 Landscape and Landscape Visual Impact Assessment matters are considered within Chapter 5 of the ES **[APP-041]** and supporting figures and appendices. The Scheme has the potential to transform the local landscape by altering the character and by virtue of the scale of the proposals; there will be significant residual landscape character and visual impacts that cannot be mitigated. Effects will primarily be derived from the introduction of construction (albeit temporary and reversible) and solar PV panels over a large area, rather than by modification of landform, field patterns or loss of characteristic elements such as hedgerows or woodland, which will be retained. The main landscape receptor within Huntingdonshire is the Southern Wolds Landscape Character Area (LCA). Significant effects are assessed for the Southern Wolds LCA in construction but not operation. The assessment concludes that no significant landscape effects will occur for Year 10 or beyond.

6.24 The Scheme has been identified in the LVIA as resulting in a significant change to a variety of visual receptors, with significant residual visual effects identified for residential locations at Year 1 (reducing to non-significant by Year 10) and from PRoW in the immediate vicinity of the solar panels and more distant open and elevated views from higher land (some remaining significant at Year 10). There will be sequential changes in views and adverse visual impacts for users of PROWs. This includes the different users of the network, such as equestrians and cyclists as well as walkers. No significant visual effects have been identified on residential receptors located directly within the villages located within the study area.

6.25 Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the landscape mitigation to screen the solar panels, but any effects of obstructed or truncated views are not referenced and will adversely change the experience of users of PRoW. Similar to the comments for landscape character, it is noted that wherever there is a moderate effect on visual amenity this is taken to be non-significant, noting the methodology indicates it could and, in some cases, should be a significant effect.

6.26 It is recommended that a review of post operation hedgerow heights is undertaken to deal with the loss of openness in views and change in landscape character arising from tall hedgerows. It is accepted that this is an appropriate mitigation in operation, but the Council considers that a more appropriate agriculturally based management regime of lower hedgerows (1.5m) should be implemented on a rotational basis post operation.

Construction Phase Impacts:

Positive

6.27 No positive landscape or visual impacts arising from construction of the Scheme have been identified, reflecting that construction is largely disruptive in a rural context and may involve removal of landscape elements (hedgerows) and/or introduction of machinery/vehicles and activity in a concentration which is incongruous in a rural context and impacts landscape character and visual amenity.

Neutral

6.28 No neutral landscape impacts arising from construction of the Scheme have been identified.

6.29 Table 2.1 of ES Appendix 5-5: Effects on Visual Receptors provides the assessment of visual effects on residents assessed within the study area, with reference to relevant viewpoint assessments. In construction, there would be no change / a neutral effect on visual amenity for the views of residents at: R1 – Swineshead Village; R3 - Coldham Lodge Farm; R6 - Green End; and R37 - Field Farm. In construction, there would be no change in views of people using community facilities C1-C4 and C6-C8, with a minor change for users of C5 - Church of All Saints at Little Staughton.

Negative

6.30 In construction, moderate to major adverse (significant) effects on landscape character are identified for the Southern Wolds LCA.

6.31 Construction impacts on landscape character would occur over a 30-month period and arise from: construction of solar arrays within largely arable fields; excavations associated with the underground cable connections; construction of new access roads; erection of temporary construction fencing and permanent boundary fencing and temporary lighting required primarily in winter months (not overnight). During construction there would also be some very localized clearance of existing hedgerow.

6.32 Overall, the construction operations would be highly visible within the Southern Wolds LCA and would give rise to a localized, but significant, change to landscape character for the 30-month duration of the construction works.

6.33 Table 2.1 of ES Appendix 5-5: Effects on Visual Receptors provides the assessment of visual effects on residents assessed within the study area, with reference to relevant viewpoint assessments.

6.34 In construction, moderate to major adverse (significant) effects on the visual amenity of residents would occur at: R9 – Properties on Great Staughton Road, east of Green End; R10 - Hoo Farm; R12 – Row of properties off the B660; R17 – Northern side of the southern extent of Green End; R19 - Lodge Farm; R20 - Rectory Farm; R21 – Home Close and Little Hollow Cottage; R22 - The Kangaroo; R23 – New Farm; R25 – Garden Farm and Garden Cottage; and at R31 - Pastures Farm.

6.35 Table 2.2 of ES Appendix 5-5: Effects on Visual Receptors summarises the assessment of visual effects on people using the public rights of way assessed within the study area. The number of PRoWs adjacent to or within the solar arrays reflects the degree to which recreational users of them would be impacted in construction.

6.36 In construction, major adverse (Significant) effects on the visual amenity of recreational users of PRoW would occur at: Footpaths 34 and 35 and Bridleway 37 and 40; Footpaths 4, 8, 13, 26, 47; Footpaths 5 (Little Staughton parish) and 213/1; Footpaths 112/5, 112/6, Bridleway 112/7 and 112/8; and Footpaths in the vicinity of Little Staughton / Green End.

6.37 Moderate to major adverse effects on the visual amenity of recreational users of PRoW would occur at: Footpaths A3, 2, 32, 11 and 12; Footpaths 1, 5, 19; and Footpaths 213/3 and 213/28.

6.38 For people in vehicles on local roads impacts would be non-significant, reflecting lower sensitivity and duration of likely views. Similarly, effects on employment sites E1-E3 would be non-significant.

Mitigation required

6.39 Mitigation, typically consisting of additional tree and hedgerow planting located on the boundaries of the site, as set out in Tables 2.1-2.4 within ES Appendix 5-5: Effects on Visual Receptors will be immature or absent during construction.

6.40 The Council considers that consideration should be given to advanced planting of mitigation, where this does not conflict with construction activity, so that there is a greater degree of maturity in Year 1 of operation.

6.41 Mitigation of landscape and visual effects in construction will be in accordance with 7.3 Outline Construction Environmental Management Plan P01 **[APP-155]** and a7.4 Outline Construction Traffic Management Plan P01 **[APP-156]**.

Operational Phase Impacts:

Positive

6.42 No positive landscape or visual impacts arising from operation of the Scheme have been identified, reflecting that the significant operational impacts on landscape character and visual amenity would occur through alteration of some of the key characteristics of the Southern Wolds LCA within which the main development will be located.

Neutral

6.43 There would be a neutral effect on LCA 4A Great Ouse Clay Valley in operation and for various viewpoint locations and receptor groups: VP4 Church of St Nicholas in Swineshead; VP22 Church of St Peter in Pertenhall; VP29 Church of St Mary the Virgin in Keysoe; 79 Junction between B645 and High Street at Hail Weston; VP80 Duloe Road VP81 Footpath 23 (Parish of Staploe); and VP82 Footpath 8A (Parish of Staploe) at the Eaton Socon Substation.

Negative

6.44 All residential receptors identified as experiencing significant visual effects during the operational phase are either individual properties, or small groups of properties, located close to the Order Limits.

6.45 No significant visual effects have been identified on residential receptors located directly within the villages located within the study area.

6.46 The residential receptors that would be subject to a significant visual effect at Year 0 during operation are as follows: R9 Properties on Great Staughton Road, east of Green End; R10 Hoo Farm; R12 Row of properties off the B660; R23 New Farm and R25 Garden Farm and Garden Cottage.

6.47 The establishment of tree and shrub planting mitigation, primarily as hedgerows, would reduce the level of effect at residential locations, such that the residual effect at Year 10 is Not Significant.

6.48 The multiple effects on rights of way identified as being subject to significant visual effects during Year 0 of operation reflect the dense network of PROW within the study area which provides connections between farms and small settlements. Significant visual effects in Year 0 of operation therefore typically relate to relatively short distance footpaths which form part of a network of PROW in and around fields and small settlements within the Site.

6.49 Some significant visual effects on users of rights of way would remain at Year 10, particularly from rights of way directly adjacent to the Site. There would be a residual change to the level of openness in views and as such the significant visual effects would remain.

6.50 The following are PROW receptors which have been identified as experiencing a significant visual effect at Year 10: Bridleway 37 and 40 and Footpaths 34 and 35, which are located directly within the southern extent of Site A; Footpaths 4, 8, 13, 26, 47, which are located directly within Site B; Footpath 5 and 20 are located on PROW situated on slightly elevated ground, close to Pertenhall, at least 1km north of Sites A and B and the residually significant effect on each of these rights of way is due to the extent of the solar array which would be evident in a single view due to Sites A and B; Footpaths 5 and 213/1 are located on PROW situated on slightly elevated ground, close to Little Staughton, within 1km south of Site B and the residually significant effect on each of these rights of way is due to the extent of the solar array which would be evident in a single view due to Site B.

6.51 No community receptors have been identified as experiencing a significant visual effect during the operation of the Scheme. Similarly, no road receptors or people at employment sites have been identified as experiencing a significant visual effect during the operation of the Scheme.

Mitigation required

6.52 Figure 2-1: Illustrative Environmental Masterplan **[APP-121]** shows the proposed landscape and visual mitigation for the Scheme. The landscape proposals are tailored to the location and required functions of each part of the Scheme, noting that these change across the Site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where possible, especially for visual receptors, at the edges of settlements and along routes and PROW connecting settlements.

6.53 Mitigation, typically consisting of additional tree and hedgerow planting located on the boundaries of the site, has been used to further screen the solar array within the Scheme, as set out in Tables 2.1-2.4 within ES Appendix 5-5: Effects on Visual Receptors **[APP-073]**.

6.54 At Year 10, the mitigation proposed, is assumed to have established to a reasonable level of maturity such that the Scheme would be more suitably integrated into the view from most visual receptors, including from residential

properties and for PROW users, the two main groups of people impacted by the Scheme.

6.55 The outline Landscape and Ecological Management Plan (LEMP) **[APP-159]** states that hedgerows will be managed at a height of 3 metres, to screen the development and provide ecological benefits. The Council accepts that this is a reasonable mitigation strategy in operation but consider that post decommissioning the presence of tall hedgerows in this context would in itself be a change in landscape character and consider that the post decommissioning height of hedgerows forming field boundaries should be reduced to 1.5 metre height over a phased 3 year rotational cut, in order to more closely match the baseline landscape of the Southern Wolds LCA.

Decommissioning Phase Impacts:

Positive

6.56 At the end of decommissioning there would likely be a residual minor beneficial effect on landscape character of the Southern Wolds LCA as there would be enhanced field structure within the Site due to the mature hedgerow and tree cover left by the Scheme.

6.57 The Council considers that this would be dependent on delivery of a review and phased implementation of modification of hedgerow heights from the 3-metre height necessary in operation to a managed height of 1.5 metres, more typical for the agricultural context. Managed reduction of hedgerow heights should commence during decommissioning and continue on a rotational basis over a 3-year period, to provide nesting continuity for birds.

Neutral

6.58 As described for construction.

Negative

6.59 Decommissioning effects in relation to landscape character and visual amenity would largely mirror those in construction but with a reduced magnitude due to enhanced screening delivered by the mitigation scheme. There would be temporary adverse effects during the removal of the Scheme which would be similar to those reported during construction, i.e. that there would be Moderate to Major Adverse levels of effect on the Southern Wolds LCA.

Mitigation required

6.60 As set out in 6.53 and 6.56 a permanent change in hedgerow heights to 3 metres is considered contrary to the baseline rural context and hence a negative effect, that can be mitigated by post operational rotational reduction in hedgerow heights.

Ecology and Nature Conservation

6.61 It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's

agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.

Relevant Development Plan policy:

6.62 Policy LP30 of Huntingdonshire's Local Plan to 2036 sets out how the Council will consider proposals in relation to biodiversity and geodiversity, including how a proposal will be required to demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated.

6.63 Policy GSNP11 of the Great Staughton Neighbourhood Plan (2021 – 2036) requires any development affecting sites of ecological importance, including locally valued sites (identified on map 9A, 9B, 9C and 9D) to follow the mitigation hierarchy: avoid impacts first, mitigate where unavoidable, and compensate only as a last resort.

6.64 The policy identifies specific sites of biodiversity importance to the village, including A2 and A4 (Map 9A), the River Kym (Map 9B), and sites C1, C2 and C3 (Map 9C). As the order limits lie south of A2, A4, the River Kym and close to C1–C3, development must identify direct or indirect adverse impact on their ecological importance (either individually or in combination with other developments), or the ecological connectivity between them.

Summary:

6.65 Ecology and Nature Conservation matters are considered within Chapter 7 of the ES **[APP-043]** and accompanying appendices **[APP-091 to APP-097]**. These are supported by the Ecology and Nature Conservation Figures **[APP-145]** and the Ecology and Nature Conservation Figures – Confidential **[APP-146]**.

6.66 The Construction Phase of the Scheme is expected to result in significant negative impacts on ecological features, including habitat loss and disturbance. Permanent habitat loss will occur due to construction activities during the 30-month construction period. These activities will also result in the potential for disturbance of species associated with these species through noise, dust, lighting, and visual intrusion.

6.67 The Scheme will involve works adjacent to / in proximity to three non-statutory sites designated as County Wildlife Sites (CWS) namely Huntingdon Wood CWS (within HDC's administrative boundary); High Wood CWS (within HDC's administrative boundary); and Kangaroo Meadows CWS (within BBC's administrative boundary). There is currently insufficient information to confirm that these sites will not be subject to hydrological impacts and that access will be maintained to ensure traditional management practices like coppicing are not impacted.

6.68 The Council has raised concerns regarding the adequacy of surveys for protected species, including ground-nesting birds, bats, hazel dormouse, water vole, and otter, which could lead to underestimating impacts. Clarifications are required from the Applicant in order to ensure that the assessment is robust and associated mitigation proposals are appropriate.

6.69 The Council has emphasized the need for a detailed farmland bird mitigation strategy, sensitive lighting measures, and expanded buffer zones for hedgerows and trees to mitigate potential ecological impacts. These measures need to be secured through the DCO process including incorporation into the Outline Construction Environmental Management Plan (oCEMP) **[APP-155]**, Outline Landscape and Ecology Management Plan (oLEMP) **[APP-159]**, DCO commitments register **[APP-154]** or other submission documents as appropriate.

6.70 During the Operational Phase, the Scheme is expected to deliver significant ecological benefits through the creation of diverse habitats, including native woodland, hedgerows, grazed pasture, and species-rich grasslands. However, concerns remain regarding the displacement of ground-nesting birds, such as skylark and lapwing, due to disturbance during operation. Additionally, shading impacts from mitigation woodland planting on Kangaroo Meadows CWS (within BBC's administrative boundary) require further clarification.

6.71 The Council stresses the need for securing a holistic biodiversity monitoring plan to complement the Biodiversity Net Gain (BNG) targets. In addition, HDC requests that clear commitments are provided to demonstrate how habitat management and maintenance will be secured throughout the 40 year operational, in order to ensure the predicted positive effects during the operational phase are achieved.

6.72 The decommissioning phase raises significant concerns regarding the long-term survival and management of habitats created under the Scheme. Once the physical infrastructure is removed, these habitats will be returned to landowners, potentially leading to a lack of ongoing management or even removal. The Council emphasizes the necessity of securing commitments for the long-term retention and management of retained habitats to ensure that the ecological benefits identified during the operational phase are preserved and sustained beyond the Scheme's lifespan.

<u>Construction Phase Impacts:</u>

Positive

6.73 No positive impacts or associated effects upon features of ecology and nature conservation importance are expected to arise from the construction of the Scheme. The Construction Phase will result in the loss of habitats including areas of existing grassland and hedgerows. In addition, the use of construction machinery and other construction activities have the potential to result in disturbance of retained ecological features (including through noise; visual; lighting and dust).

Neutral

6.74 The Scheme is not expected to result in any impact (or associated effect) upon the bird populations for which the Grafham Water Site of Special Scientific Interest (SSSI) is designated. Surveys identified a bird assemblage typical of lowland agricultural habitat with only low and irregular use by common waterbirds. Therefore, the effect on Grafham Water SSSI is expected to be Neutral.

6.75 No losses of ancient woodland or veteran trees will occur as a result of the Scheme. All such trees will be retained with appropriate buffers.

6.76 Three watercourse crossings will utilise horizontal directional drilling thus avoiding impacts on the watercourse.

6.77 Assuming that standard construction controls are implemented, such as implementation of the Outline Construction Environmental Management Plan (oCEMP) **[APP-155]** then it is expected that impacts of the Scheme on several ecological features including reptiles and foraging/ commuting bats will be avoided or reduced to a level that they are considered Neutral.

Negative

6.78 During the Construction Phase the Scheme will result in negative effects on ecological features of importance for ecology and nature conservation. This will include habitat loss due to the construction of the solar arrays, associated access roads and excavations associated with underground cable connections. In addition to permanent impacts there will be some temporary negative impacts (and associated effects) during the 30-month construction period including temporary habitat loss (e.g. for compounds and fencing) as well as potential disturbance (lighting, dust noise and visual) of habitats and species.

Designated Sites

6.79 The Scheme will involve works adjacent to / in proximity to three non-statutory sites:

- Huntingdon Wood County Wildlife Site (CWS) within HDC's administrative boundary (designated for its ancient woodland, an irreplaceable resource);
- High Wood County Wildlife Site (CWS) within HDC's administrative boundary designated for its ancient woodland, an irreplaceable resource, and the support it provides to diverse invertebrate and amphibian populations; and
- Kangaroo Meadows CWS within BBC's administrative boundary designated for neutral grassland communities.

6.80 While no direct loss of habitat within these sites is expected, the Council is concerned that there is currently insufficient information to verify the Applicant's conclusion that these sites will not be adversely impacted during construction.

6.81 Further information is required to assess the potential for hydrological impacts through trenching in close proximity to Huntingdon Wood CWS and potential impacts of the use of an existing culvert for construction access. Regarding High

Wood further information is required to demonstrate that traditional practices (such as coppicing) undertaken to maintain the high wildlife value of the CWS will not be adversely impacted upon during construction.

Habitats

6.82 The Scheme will result in the removal of a total of 84 metres of hedgerow, a Habitat of Principal Importance under the Natural Environment and Rural Communities Act (2006, as amended), with 42 metres of this directly reinstated following the completion of construction works.

6.83 The Scheme requires a total of 22 new watercourse crossings and one upgraded watercourse crossing and these will result in small scale habitat loss and or disturbance

6.84 Remaining habitats removed in order to construct the Scheme consists of lower importance habitat such as arable habitat, grassland field margins and areas of scrub.

6.85 Protected and/or Notable Species – The Council remain concerned that the assessment for certain species groups is based on incomplete survey information (e.g. spot check surveys only for water vole/otter and some areas inaccessible for bird and newt survey). It is not always clear within the assessment how these shortfalls in data have been considered and their impact on the final assessment conclusions; this concern is set out below.

6.86 Ground nesting birds – The Council is concerned that without suitable mitigation and compensation provision the Scheme has potential to result in a significant adverse effect on ground nesting birds, in particular skylarks (125 territories recorded within the Site). The ES Vol 1 Chapter 7 **[APP-043]** sets out at para 7.8.112 the intention to create large areas of open grassland 'to be of benefit for skylark and lapwing and to encourage nesting attempts within these areas'. The oLEMP **[APP-159]** currently provides insufficient detail to demonstrate that the proposed measures will be sufficient.

6.87 These details are required to assess the appropriateness of the measures proposed and determine if further off-site compensation is required. The Applicant is referred to the RSPB 'Farming for Wildlife: Skylark Plots' (nd) regarding accepted guidance of size of area to be set aside.

6.88 Roosting bats and trees – The Council is concerned that trees within and adjacent to the Site have not been surveyed to identify their potential to support roosting bats. The Applicant has stated at para7.7.20 of the ES Vol 1 Chapter 7 **[APP-043]** that 'trees present within the Site would be retained and protected during construction', however the Council consider that as a minimum the location of PRF-I and PRF-M trees should be established in order that it can be demonstrated within the oCEMP **[APP-155]** or oLEMP **[APP-159]**, that suitable protection buffers

can be incorporated into the design for all relevant trees. The minimum 6 metre hedgerow buffer outlined in the ES would be insufficient to prevent disturbance where roosts are confirmed or have the potential to be present.

6.89 Hazel dormouse – The Council note that while the presence of hazel dormouse is unlikely, in the absence of a survey it is not possible to fully rule out its presence. The small scale of potential hedgerow impacts is acknowledged; however, further detail should be provided on how any residual risks of impacts on hazel dormouse will be avoided (e.g. through the application of a precautionary method of works incorporating sensitive timing and working methods).

6.90 Water vole and otter – A single combined survey visit for water vole and otter has been undertaken for each proposed watercourse crossing point during June 2025. This survey appears to have consisted of spot checks of crossing point location rather a more comprehensive survey of suitable habitat within/adjoining the Site. The Council are concerned that for water vole in particular the presence of dense vegetation may have obscured field signs leading to under recording, and due to the restricted survey undertaken areas identified for 'enhancement' have not been subject to baseline surveys. However, the Council is content that the proposed pre-construction checks detailed in Section 5 of the oLEMP **[APP-159]** alongside the commitment to positive management of retained ditches provided in para6.4.8 to 6.4.13 of the oLEMP are likely sufficient to demonstrate potential impacts can be mitigated if they are found to be present. However, further clarification is required on enhancement proposals including proposals for baseline surveys of areas identified for enhancement to check their existing water vole status.

6.91 Great crested newt – It is noted that the 2025 surveys have confirmed the presence of great crested newt within the Site at waterbody references P14 and P25. The great crested newt survey report **[APP-095]** identifies P46 as adjacent to the Site but does not include details of this waterbody. Confirmation is required what (if any) survey has been undertaken at P46.

Mitigation required

Farmland Bird Mitigation Strategy

6.92 It is recommended that a detailed farmland birds mitigation strategy (covering both breeding and non-breeding birds) is produced to include (but not be limited to):

- details of proposed habitat losses and gains (overall area and territory numbers);
- measures to be employed to protect ground nesting birds during construction and operational phases;
- consideration of the phasing of both impacts and proposed mitigation/compensation provision; and,
- how the proposed management regime will ensure that habitats are managed in a suitable manner to ensure they remain suitable for use by skylark and other ground nesting birds.

Cross reference on commitments

6.93 The Council welcome the proposed biodiversity mitigation / compensation set out in ES Vol 1 Chapter 7 **[APP-043]**, however, some have not been adequately incorporated into other submission documents (e.g. environmental masterplan, engineering drawing, management plans, DCO commitments, etc.) and therefore, delivery cannot be assumed; by example:

a) References to incorporation of sensitive lighting design need to be better reflected in the content of the oLEMP **[APP-159]** and oCEMP **[APP-155]** to ensure adverse effects on adjoining habitats such as Huntingdon Wood CWS, High Wood CWS, and other ancient woodland are avoided. **[APP-031]** Planning Statement para4.7.19 (cross-referenced with **[APP-038]**, para2.5.24 - 2.5.27 and **[APP-155]** para4.1.26 – 4.1.29): the Applicant's approach that appropriate artificial lighting will be controlled / managed (in part) to ensure that impacts on ecological receptors, nearby residents and amenity users of the Site are minimised is welcomed.

i. Attention is drawn to NPS EN-3 (para2.10.46 to 2.10.48) which states that lighting relating to security measures should be fully assessed by the Applicant.

ii. It is recommended that the submission of and approval of specific lighting measures form a requirement within the DCO's Schedule of Requirements.

b) Similarly, the Council welcome the inclusion of the expected biodiversity net gain metric outputs as commitment C12 of the Commitments Register **[APP-154]**. However, the Council are concerned that these commitments are not currently reflected in the oLEMP **[APP-159]**, and currently the calculation undertaken is high-level only. The Council requests that commitments are clearly stated in the oLEMP to ensure clarity on targets post construction.

c) The Council notes that the final biodiversity net gain outcomes will be dependent on created habitats being maintained and suitably managed. Given the temporary nature of the Scheme, and that ongoing management of created habitats after decommissioning are not currently secured, the Council consider the current BNG calculation outputs (and linked beneficial effects) may therefore overstate the likely final scheme outcome.

i. It is suggested that this needs comprehensive review, including how these commitments are then secured in the DCO Agreement.

Planting selection

6.94 The proposed woodland planting and that plants of local provenance are to be utilised is welcomed. The Council requests that the final woodland, hedgerow, and river course planting stock list (species list) should be discussed with the local planning authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities should be taken to incorporate locally important species, include native black poplar and

Huntingdonshire elm (resilient to Dutch elm disease). Further, an understory of grasses, wildflower meadows, and bulb species add to habitat diversity and ecological resistance would be encouraged.

Landscape widths

6.95 The Council note that the minimum six metre buffer between the fenceline of the solar farm and the surround hedgerows specified in **[APP-159]** oLEMP Section 3.4.1 is low, in particular for hedgerows containing standard trees. The Council would wish to see that these minimum buffers are extended, and greater consideration is given to varying the overall extent of panels at the margins of the site to provide larger buffer zones that will enhance their value for a range of species.

Grassland establishment

6.96 The Council have concerns regarding the method identified for establishment of diverse grassland in the areas identified within the illustrative Environmental Masterplan **[APP-121]** and the oLEMP **[APP-159]**. These areas are largely currently in arable use and therefore likely to have high nutrient levels. Current proposals do not initially incorporate methods to reduce soil fertility (e.g. soil inversion) or promote diversity (e.g. sowing of yellow rattle). If there is a need to rely on frequent early cutting of the sward to reduce nutrient levels, this may conflict with the proposed use of the same areas to provide habitat for ground nesting birds.

Veteran trees

6.97 The embedded mitigation measures for veteran trees and trees with veteran features outlines in the oCEMP **[APP-155]** are welcomed. The Council request that for consistency, reference to these measures is also referenced within the oLEMP **[APP-159]**.

<u>Operational Phase Impacts:</u>

Positive

6.98 The Scheme would result in the creation of significant areas of habitat creation including approximately 19 ha of native species woodland or woodland belt; 17.4km of native species hedgerow; 375 individual native species trees; 448 ha of grazing pasture of neutral grassland and 205 hectares of species diverse grassland. The establishment and ongoing maintenance of these habitats during the operational phase is expected to result in a significant positive effect on habitats during the 40-year operational. In addition, these habitats have the potential to result in positive effects for breeding birds (except ground nesting species), foraging and commuting bats, amphibians and reptiles.

Neutral

6.99 During the operational phase no effects are expected on statutory designated sites for nature conservation or Huntingdon Wood CWS or High Wood CWS which adjoin the Scheme.

6.100 During operation the impact (and corresponding effects) on otter and water vole populations utilising watercourses within and adjacent to the Scheme are expected to be Neutral.

Negative

6.101 At Kangaroo Meadows CWS clarification is required on the potential for adverse effects on existing grassland through shading by proposed mitigation woodland planting once mature.

6.102 The presence of an operational array of solar panels is expected to result in ongoing disturbance that will result in displacement of ground nesting bird species including skylark and lapwing. This is expected to result in negative effects on ground nesting birds. The extent to which this impact will be offset by the proposed additional details relating to required farmland mitigation measures highlighted in relation to impacts arising during the Construction Phase. With implementation of an appropriate mitigation strategy this potential negative effect during operation could be reduced to a level where it is not significant.

Mitigation required

Farmland Bird Mitigation Strategy

6.103 The measures proposed in relation to farmland birds within the Construction Phase are also relevant to the Operational Phase.

Monitoring strategy

6.104 The frequency of monitoring set out within Section 8.0 of the oLEMP **[APP-159]** is welcomed, but the Council note that the existing monitoring proposals appear largely aimed at assessing progress towards the Biodiversity Net Gain (BNG) targets. Given that the Site is utilised by a range of protected and/or notable species, including a significant ground nesting bird population, a more holistic monitoring strategy including bird surveys is necessary. This should include the consideration of species and wider ecosystem characteristics. Adherence to the standard approach to monitoring biodiversity promoted in Solar Energy UK guidance is strongly recommended.

6.105 In terms of monitoring, the Council would seek to ensure that an appropriate fee is secured for the ongoing monitoring of BNG, ecology, and landscape mitigation works, as responsibility for this duty will fall to HDC and the other host authorities. This would need to be secured either through a Section 106 agreement or via the proposed Landscape and Ecological Management Plan Steering Group mechanism outlined in section 4.2 of the oLEMP.

6.106 While the delivery of +10% BNG is not currently mandatory for NSIPs, other solar schemes have achieved substantial BNG gains, and monitoring fees are being secured through Section 106 agreements on comparable projects (e.g., Springwell Solar Farm). The monitoring regime described in Section 8 of the oLEMP will require internal resource to review maintenance and monitoring reports annually for the first five years and every fifth year thereafter for a 40-year period, as well as

undertaking annual site walkovers and any associated enforcement actions that may arise.

40-year landscape management

6.107 The Scheme is identified within ES Vol 1 Chapter 7 **[APP-043]** as having an 'operational lifespan of up to 40-years'; and (para7.5.29) 'LEMP…landscape mitigation and ecological mitigation…and would also set out how this would be managed by the Applicant over the lifespan of the Scheme'. The Council would like to understand how the Applicant assesses and addresses the management and maintenance of the existing mature and a new maturing landscape habitat over the operational lifespan of the Scheme (circa 40-years). This represents a significant financial and staffing commitment which is currently not evidenced (Ref. Scoping Reports, 2023).

6.108 While the Council is in-principle supportive of the Applicant's **[APP-157]** outline Operational Environmental Management Plan, **[APP-159]** oLEMP and **[APP-161]** outline Soil Management Plan (oSMP), these require more detailed resolution, specifically how they are to be staffed and implemented over the 40-year operational phase.

<u>Decommissioning Phase Impacts:</u>

Positive

6.109 No positive impacts or effects on features of ecology and nature conservation importance are expected during the decommissioning phase.

Neutral

6.110 No neutral impacts or effects on features of ecology and nature conservation are expected during the decommissioning phase.

Negative

6.111 The Council is concerned that there is a lack of information on the long-term survival (i.e. beyond 40 years) of the habitats created as mitigation and compensation. It is the Council's understanding that the powers requested under the DCO will not seek to remove any of the habitats created or established by the Scheme on the Site. However, following decommissioning (i.e. the removal of the physical infrastructure) all habitats would be returned to landowners, and at this point ongoing management may cease or they could potentially be removed subject to the relevant legislative and policy requirements at the time being adhered to.

6.112 The extent to which the long-term retention and ongoing management of these habitats is secured is considered a vital part in substantiating the overall residual effects of the Scheme on ecological features reported in the ES.

Mitigation required:

6.113 The Council seeks agreement from the Applicant that areas of species-diverse grassland to be created under the Scheme will be retained and their long-term

management secured to ensure the beneficial effects identified in the ES are permanent.

Biodiversity Net Gain

6.114 It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' LIRs. This content is therefore included within HDC's submission for completeness.

Relevant Development Plan policy:

6.115 Policy LP30 (Biodiversity and Geodiversity) of Huntingdonshire's Local Plan to 2036 states a proposal will ensure no net loss in biodiversity and provide a net gain where possible, through the planned retention, enhancement and creation of habitats and wildlife features, appropriate to the scale, type and location of development. Large scale development proposals should provide an audit of losses and gains in biodiversity produced according to a recognised methodology.

6.116 Policy GSNP 11 of the Great Staughton Neighbourhood Plan (2021 – 2036) states when a biodiversity net gain proposal is being formulated, the following are encouraged:

i. The creation of new natural habitats appropriate for important wildlife species.
ii. The planting of additional trees and hedgerows.
iii. Restoring and enhancing existing biodiversity.
iv. Creating new wildlife corridors especially where these will help protect or enhance existing corridors in the parish.
v. The restoration or creation of new natural habitats especially where these will help protect or enhance existing habitats.

Summary:

6.117 The Applicant has undertaken a BNG assessment using the Defra Statutory Biodiversity Metric. The baseline is dominated by intensively managed agricultural land, with relatively limited areas of higher value semi-natural habitat.

6.118 The Applicant's assessment indicates that the Scheme could deliver BNG of approximately 79.51% for area-based habitats, 36.91% for hedgerows and 5.95% for watercourses. The Council welcomes the intention to deliver biodiversity enhancements through habitat creation and improved land management across the Site.

6.119 However, the Council notes that the BNG assessment currently represents a high-level calculation and that delivery of the predicted biodiversity gains will depend on the successful establishment, management and monitoring of the proposed habitats. In particular, the Council considers that the final biodiversity outcomes

will be influenced by the detailed design and implementation of habitat creation measures, including soil preparation and the interaction between proposed habitats and operational infrastructure such as solar arrays.

6.120 The Council also notes that the spatial information presented within the application documents does not clearly show the relationship between proposed habitat creation areas and the full extent of operational infrastructure across the Site. Greater clarity on the spatial arrangement of solar panels, access tracks and habitat areas would assist in understanding how the predicted biodiversity outcomes will be achieved.

6.121 In addition, the Council considers that opportunities may exist to further strengthen the BNG strategy through the enhancement of retained habitats and watercourses where practicable.

6.122 Finally, the Council notes that the Scheme has an operational lifespan of up to 40 years, after which solar infrastructure would be removed and the future land use determined. The long-term retention and management of habitats created as part of the BNG strategy beyond this period is therefore uncertain, meaning the biodiversity benefits delivered during the operational phase may not represent permanent biodiversity gains.

<u>Construction Phase Impacts:</u>

Positive

6.123 The Council notes that the Scheme design incorporates measures intended to minimise impacts on ecological features, including the retention of the majority of existing hedgerows, woodland blocks and watercourses within the Site. The layout of the Scheme has sought to avoid direct impacts on these features where practicable.

Neutral

6.124 The Council notes that the BNG assessment does not generate biodiversity units during the construction phase, as habitat creation and enhancement measures would be implemented following completion of construction activities.

Negative

6.125 Construction of the Scheme will result in the loss or conversion of habitats within the development footprint. While much of the baseline habitat comprises low-distinctiveness agricultural land, the baseline assessment identifies approximately 42.7 ha of medium distinctiveness habitats, including other neutral grassland and areas of scrub, a proportion of which will be lost.

6.126 The BNG assessment also identifies limited removal of existing hedgerow, amounting to approximately 0.07 km of baseline hedgerow loss across the Site.

Mitigation required:

6.127 The Council notes that habitat losses are reflected within the BNG assessment and are proposed to be addressed through habitat creation and enhancement measures to be delivered as part of the Scheme. However, the Council emphasises that the mitigation hierarchy should continue to be applied through the detailed design and construction phases, ensuring that habitat loss is avoided and minimised wherever practicable before reliance is placed on compensatory habitat creation.

6.128 The Council considers that mitigation during construction should be secured through the final CEMP to be approved prior to construction, including appropriate habitat protection measures and ecological supervision where works occur in proximity to retained habitats.

6.129 The Council also notes that opportunities may exist to undertake early habitat creation and planting during construction, where practicable. Early implementation of habitat creation measures could support earlier establishment of habitats and reduce the temporal lag between habitat loss and delivery of biodiversity enhancements.

6.130 The Council notes that the construction programme for the Scheme extends over a period of approximately 30 months, with habitat mitigation and landscaping proposed towards the later stages of construction. The BNG assessment does not apply a delay to the time to target condition for created habitats and therefore assumes that habitat creation occurs immediately following habitat loss. However, the construction programme indicates that the establishment of replacement habitats would occur during the later stages of the construction period. The Council requests clarification as to how the timing of habitat creation relative to the construction programme is reflected in the BNG assessment.

<u>Operational Phase Impacts:</u>

Positive

6.131 During operation, the Applicant proposes the creation of habitats including species-rich grassland, woodland planting and native hedgerow creation. The Council recognises that the conversion of intensively managed agricultural land to habitats managed for biodiversity has the potential to deliver ecological benefits if successfully established and maintained.

6.132 The Applicant's BNG assessment predicts net gains of approximately 79.51% for area-based habitats, 36.91% for hedgerows and 5.95% for watercourses, arising primarily from the conversion of existing arable land to habitats managed for biodiversity.

Neutral

6.133 Once operational, the Site is expected to experience relatively low levels of activity and will primarily be managed for habitat establishment and ecological enhancement.

Negative

6.134 Operational infrastructure including solar arrays, fencing and access tracks will occupy areas of the Site and limit the extent of habitat creation in those locations. The Applicant's BNG assessment does not include a post-development BNG figure showing the location of operational infrastructure alongside proposed habitat creation areas. As such, it is not clear how the interaction between infrastructure and proposed habitats has been accounted for within the BNG assessment. The Council therefore requests that a post-development BNG figure is provided to clearly show the spatial relationship between solar infrastructure and proposed habitats.

6.135 The Council notes that the predicted biodiversity net gains are dependent on the successful establishment and long-term management of created habitats, particularly species-rich grassland. Many of the proposed habitat creation areas are currently under arable cultivation and may therefore have elevated nutrient levels, which can present challenges for the establishment of species-rich grassland without appropriate soil preparation measures.

6.136 The Council also notes that modified grassland habitat is proposed within fields containing solar panels, where shading, changes in rainfall distribution and operational management constraints may influence habitat establishment and condition. The BNG assessment currently assumes that these habitats will achieve moderate condition, and the Council request clarification as to how this target condition has been determined and whether it is considered achievable in areas located beneath or adjacent to solar infrastructure.

Mitigation required

6.137 The Council considers that further clarity is required regarding how the predicted BNG will be secured and delivered through the LEMP, including how the management prescriptions within the LEMP link to the proposed biodiversity net gain commitment and demonstrate how the targeted BNG outcomes will be achieved.

6.138 In particular, the Council considers that additional details would be beneficial regarding the long-term management, monitoring and resourcing of habitat creation measures, including the frequency and scope of monitoring, over the operational lifespan of the Scheme (up to 40 years). This will be necessary to ensure that the biodiversity gains predicted by the BNG assessment are achieved and maintained and that habitat establishment and wider ecological outcomes are effectively monitored.

6.139 The Council notes that the habitat mapping provided within the oLEMP does not show the full extent of operational infrastructure across the Site, with solar panel arrays, access tracks and other infrastructure not presented on the habitat plans beyond the battery storage and substation. While the BNG assessment assumes that a proportion of land will be occupied by infrastructure, the absence of these elements from the habitat figures makes it difficult to understand how proposed

habitats will spatially interact with the operational layout of the Scheme. The Council considers that the post-development habitat plans should clearly show the location of solar panels, access tracks and associated infrastructure alongside proposed habitat creation and enhancement areas to improve transparency of the assessment.

6.140 The Council also notes that the BNG assessment largely distinguishes between habitats which are retained and those proposed to be newly created. While habitat creation forms an important component of the BNG strategy, the Council considers that opportunities may also exist to enhance existing habitats within the Site, particularly retained hedgerows and other linear features. The Council would welcome consideration of whether such enhancement opportunities could be incorporated within the habitat management strategy to strengthen habitat connectivity and biodiversity outcomes across the Site.

6.141 The Council would also welcome consideration of additional opportunities to enhance watercourse habitats where practicable, including through improvements to channel condition, riparian vegetation and wider habitat connectivity, in order to maximise biodiversity benefits associated with the Scheme.

Decommissioning Phase Impacts:

Positive

6.142 Removal of solar infrastructure at the end of the operational life of the Scheme may provide opportunities for restoration of the Site and potential retention or adaptation of habitats established during operation.

Neutral

6.143 Decommissioning activities will be temporary and undertaken in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP).

Negative

6.144 Application documents indicate that solar infrastructure will be removed and the land restored following decommissioning, with the future land use determined at that time. The Council notes that habitats created as part of the BNG strategy would therefore revert to landowners once the Scheme is decommissioned.

6.145 The Council is concerned that the long-term retention and management of habitats created to deliver the predicted biodiversity net gains are not currently secured beyond the operational lifetime of the Scheme. As a result, the biodiversity enhancements identified in the BNG assessment may not represent permanent biodiversity gains.

Mitigation required

6.146 The Council considers that further clarification is required regarding the intended approach to habitat retention and long-term management following decommissioning. In particular, the Council would welcome confirmation as to

whether habitats created as part of the BNG strategy could be retained where appropriate, and how the long-term biodiversity benefits associated with the Scheme would be secured.

Flood Risk and Drainage

Relevant Development Plan policy:

6.147 Policy LP5 requires that development is only supported where all forms of flood risk, including defence breaches or failures, have been fully addressed in line with national guidance and the Cambridgeshire Flood and Water Supplementary Planning Document (2017). Proposals must pass the sequential test (and the exception test where necessary), locate development within the site to avoid flood risk, take all reasonable opportunities to reduce overall flood risk, avoid adverse effects on flood defences, and meet all SPD requirements.

Summary:

6.148 Hydrology and Flood Risk are considered within Chapter 8 of the ES **[APP-042]** and supporting figures and appendices, identifying any likely significant effects

6.149 Detailed technical comments on flood risk and drainage matters are deferred to Cambridgeshire County Council, in its role as Lead Local Flood Authority (LLFA), and to the Environment Agency (EA). The assessment below therefore focuses on the Sequential and Exception Tests, which are policy considerations required under Policy LP5 of Huntingdonshire's Local Plan to 2036 and the National Planning Policy Framework (2024).

6.150 The majority of the Site lies within Flood Zone 1, as defined by the EA's Flood Map for Planning and confirmed in Huntingdonshire District Council's Strategic Flood Risk Assessment (2025). Small parts of the Order Limits intersect Flood Zones 2 and 3, associated with the Pertenhall Brook, River Kym and smaller watercourses within Sites A, B and C, the section of the grid connection corridor crossed by the Duloe Brook, and the Honeydon and Colmworth Brooks adjacent to the Eaton Socon Substation land. Parts of the Site are also identified as being at risk of surface-water (pluvial) flooding.

6.151 Accordingly, the Applicant has undertaken a Sequential Test followed the Exception Test. The Applicant's approach is set out in Section 4.1 of ES Vol 2 Appendix 8-1: Flood Risk Assessment P01 **[APP-098]** (FRA). Based on the information provided, HDC notes that the Applicant has considered both fluvial and pluvial flood risk within its broader site-selection process. The layout places all critical infrastructure outside of Flood Zones 2 and 3. Some solar arrays are located within areas mapped as being at risk of surface-water flooding. Where this occurs, the FRA confirms that the arrays would be installed so that the underside of the panels is above the modelled maximum flood level, with only support legs situated within areas of predicted inundation. Where parts of the Scheme are located within fluvial or surface-water flood-risk areas, the Applicant has

identified either that the development is not adversely affected by the risk or that mitigation measures are incorporated into the design which are reflected in the Design Parameters and Principles Statement **[APP-153]** which is secured by a Requirement of the draft DCO **[PDA-005].**

6.152 In relation to the identification of reasonably available sites, the Applicant's FRA describes a site-selection process driven primarily by the need to locate the Scheme within a viable distance of a point of connection with adequate grid capacity. A 15 km search area around Eaton Socon Substation was reviewed against a range of environmental and planning constraints, including areas of higher fluvial and surface-water flood risk. The Applicant concludes that all potential search areas were subject to varying degrees of constraint and that, when balanced collectively, the chosen landholding represented the most suitable and deliverable option.

6.153 On the basis of the information submitted, there is no clear evidence before the Council that the Applicant's approach to the sequential and exception tests conflict with the requirements of Policy LP5 or the NPPF 2024. Accordingly, the Council is content to note the Applicant's position on both the sequential test and, where relevant, the exception test, but defers to the EA and other statutory flood-risk bodies on the technical adequacy of the assessment.

6.154 Overall, the local impact in terms of flood risk is considered to be neutral, subject to resolution of any outstanding matters raised by the LLFA (Section 6 of CCC's Relevant Representation **[RR-150]**) and the EA (**[RR-367]**), as the relevant statutory authorities for this topic.

Heritage Impacts (Above-Ground Heritage Assets)

Relevant Development Plan policy:

6.155 Policy LP34 of Huntingdonshire's Local Plan to 2036 states that great weight and importance is given to the conservation of heritage assets and their settings. The statutory presumption of the avoidance of harm can only be outweighed if there are public benefits that are powerful enough to do so.

6.156 Policy GSNP10 of the Great Staughton Neighbourhood Plan (2021 to 2026) identifies several non-designated heritage assets, including Asset 7: Ridge and Furrow Fields, which is in proximity to the Order Limits. Development affecting these assets must be assessed against the scale of harm and the asset's significance, in line with the NPPF and Local Plan Policy LP34.

Summary:

6.157 Cultural Heritage and Archaeology are considered within Chapter 6 of the ES **[APP-042]** and supporting figures and appendices. As set out in paragraph 9.1 of HDC's Relevant Representation, comments on archaeology are deferred to the Historic Environment Team at CCC.

6.158 The proposed development is located in farmland situated south of Great Staughton and Kimbolton Conservation Areas. Direct impact on those heritage assets or associated listed buildings is likely to be limited, provided that construction traffic in those areas is managed appropriately during construction and decommissioning phases.

6.159 Longer term impacts through the operation phases of the solar farm will be confined to the settings of the listed buildings and the wider historic landscapes associated with the Great Staughton and Kimbolton Conservation Areas. Solar panels and associated infrastructure has been located in a way that avoids substantial impacts to the significance of the heritage assets. The loss of rural landscape character caused by industrialisation of the farmland will be less than substantially harmful to the significance of the heritage assets but can be mitigated to an extent by the proposed additional planting.

6.160 There would be a neutral impact on non-designated heritage asset 7: Ridge and Furrow Fields identified in the Great Staughton Neighbourhood (2021 to 2026) during all phases of the project.

Construction Phase Impacts:

Positive

6.161 No positive impacts or effects are anticipated during the construction phase.

Neutral

6.162 No neutral impacts or effects are anticipated during the construction phase.

Negative

6.163 There is the potential for heavy construction traffic to cause damage to historic structures through vibration or collision and to harm the character of the conservation areas by adding noise, dust and movement.

Mitigation required

6.164 In accordance with the oCEMP (paragraph 2.5.2, p17) **[APP-155],** it is intended to route construction traffic away from Great Gransden and Kimbolton which will limit the direct impacts of vibration, noise and dust to heritage assets in those villages. For the settings of heritage assets, it is intended that best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with the oCEMP **[APP-155]**. These aspects are to be secured and controlled by Schedule 2 of the draft DCO **[PDA-005]**.

Operational Phase Impacts:

Positive

6.165 No positive impacts or effects are anticipated during the operational phase.

Neutral

6.166 No neutral impacts or effects are anticipated during the operational phase.

Negative

6.167 No listed buildings or conservation areas fall within the Order Limits **[APP-007]**. The main impact to the significance of heritage assets in Huntingdonshire will be in the alteration to their settings through the visual impacts caused by solar panels and associated infrastructure.

6.168 The Settings Impact Assessment **[APP-083]** concludes that there will be a limited impact to Kimbolton Conservation Area and associated listed buildings due to topography, intervening screening from vegetation and the existing built form of the village. This screening is enhanced by the location of the village in the valley base of the River Kym.

6.169 However, there are still concerns that the setting to Warren House will be negatively impacted as it is located on a ridge some 30 metres above Kimbolton. Assessment of the impact to the wider setting of this Grade II* listed building is particularly important as its elevated location gives it a prominence and overview that cannot be mitigated by additional screening.

6.170 The location for Warren House was chosen to allow expansive views across the Kym valley and associated countryside as well as Kimbolton Castle estate. Currently described as a 'vista' building in the listing description, this has been taken by the Applicant to suggest that its primary significance is as a feature within the landscape as viewed from Kimbolton Castle. This may relate to one phase of the building but as Caroline Stanford argues, Warren House is a rare surviving example of a warren lodge which "acted as a stamp of authority on the landscape, providing wide views and often in commanding positions" (The Warren House, Kimbolton, Cambridgeshire: a rare & interesting survival. Transactions of the Ancient Monuments Society, Vol 58. 2014). With this interpretation the significance of the Heritage Asset relies not only on how it is experienced in proximity to Kimbolton Castle and its parkland but in the contribution of the wider landscape setting to the significance of the building from its elevated location.

6.171 At the time of writing the Applicant does not appear to have undertaken a full assessment of the visual impact of the solar panels and infrastructure in views from Warren House towards Site B to the south. Within the Settings Impact Assessment **[APP-083]** on page 40-41, the Applicant bases their assessment on "a visualisation taken from the elevated ridgeline to the east of Little Staughton (VP51ii) [which] shows a potential heavily obscured (by mature vegetation and trees) glimpse of the location of Warren House on the elevated ridge to the north of the Scheme". The assessment of the views from Warren House is therefore based on an inference of potential harm rather than on a viewpoint from the heritage asset itself. An additional viewpoint from Warren House is required to confirm the level of harm identified by the initial assessment.

6.172 To the south of Great Staughton Conservation Areas the solar arrays of Site C will extend into the rising southern valley side that ends in a ridge some 30m above the

River Kym. The topography will partly negate the impact of screen planting and it is likely that any planting will take a relatively long time to be established at the height and density required to be effective. The impact will be greatest when travelling along Causeway between Great Staughton The Town Conservation Area and Great Staughton The Highway Conservation Areas.

Mitigation required

6.173 The proposed screen planting is likely to be moderately effective in the longer term but will take some time to become established. With the mitigation proposed, the harm to the significance of Heritage Assets is likely to be less than substantial. It is unlikely that screening can be used to mitigate the impact of the solar panels on the wider setting to Warren House; nevertheless, the impact is likely to be less than substantial.

6.174 The outline Heritage Enhancement Strategy **[APP-167]** key aims and objectives primarily concentrate on archaeological assets of the Romano-British period. This misses out on an opportunity to research, collate and present new evidence for post-Roman, early medieval and post Conquest land use in a way that informs the historian and wider public on the development of Great Staughton.

6.175 It is important to present a narrative that links the archaeological assets with those existing above ground and through which aims to enhance the significance of the historic environment as a whole. Particularly as the scheme bisects Great Staughton Parish which will further obscure the spatial and historic relationship between the scheduled manorial site of Cretingsbury and the historic built form of Great Staughton.

<u>Decommissioning Phase Impacts:</u>

Positive

6.176 Removal of solar panels and associated infrastructure will re-establish the rural character of the settings to the heritage assets which will enhance their significance.

Neutral

6.177 The potential removal of screening by land owners after decommissioning is likely to have a neutral impact on the significance of heritage assets as they are experienced within their wider settings. The retention or removal of tree belts and hedgerows is not likely to change the rural character of the landscape.

Negative

6.178 There is the potential for heavy traffic to cause damage to historic structures through vibration or collision and to harm the character of the conservation areas by adding noise, dust and movement during decommissioning.

Mitigation required

6.179 All decommissioning traffic should be routed away from Great Gransden and Kimbolton to limit the direct impacts of vibration, noise and dust to heritage assets

in those villages. For the settings of heritage assets, best practice measures will be implemented to control noise, light, vibration, and vehicle movements to be secured through the oDEMP **[APP-158]** in Schedule 2 of the draft DCO **[PDA-005]**.

Amenity, including impacts from noise and vibration, air quality and contamination

Relevant Local Plan policy:

6.180 Policy LP14 (Amenity) of Huntingdonshire's Local Plan to 2036 states that a proposal will be supported where a high standard of amenity is provided for all users and occupiers of the proposed development and maintained for users and occupiers of neighbouring land and buildings.

6.181 Policy LP36 (Air Quality) addresses air quality and sets out when an Air Quality Assessment and appropriate mitigation, including a Low Emissions Strategy where necessary, is required.

6.182 Policy LP37 (Ground Contamination and Groundwater Pollution) addresses ground contamination and groundwater protection, setting out when investigation, risk assessment and any necessary remediation or safeguards are required.

6.183 Policy LP10 (The Countryside) part c. states that development in the countryside must not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.

Noise and Vibration

Summary:

6.184 Noise and Vibration are considered within Chapter 10 of the ES **[APP-046]** and supporting figures and appendices. Various management plans have been submitted covering construction, operational and decommissioning noise and vibration, as well as construction hours. These controls will mitigate local noise emissions and are agreed by HDC. HDC are also satisfied that there are no significant adverse cumulative effects of noise and air quality.

Construction Phase Impacts:

Positive

6.185 No positive impacts or effects are expected during the construction phase.

Neutral

6.186 The ES Chapter 10, Table 10.8 **[APP-046]** identifies threshold noise levels of 65dB LAeq (0700–1900 weekdays; 0700–1200 Saturdays), 45dB LAeq (night) and 55dB LAeq (evenings and weekends) in accordance with BS 5228. These levels are acceptable.

6.187 Construction traffic noise is expected to increase by 1 - 3dB, representing a minor (slight) and acceptable impact.

6.188 Construction vibration is predicted between 0.3 - 1.0 mm/s PPV, also a minor (slight) and acceptable impact.

6.189 The proposed construction hours (08:00 - 18:00 Monday – Friday; 08:00 - 13:00 Saturday) are acceptable.

Negative

6.190 Potential for unacceptable noise if activities are not planned and managed correctly.

Mitigation required

6.191 No additional mitigation is required beyond securing the oCEMP **[APP-155]** and the oCTMP **[APP-156]** as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.

Operational Phase Impacts:

Positive

6.192 No positive impacts or effects are expected during the operational phase.

Neutral

6.193 Solar power plant is typically quieter than traditional power plants.

Negative

6.194 Potential for unacceptable noise if not managed appropriately.

Mitigation required

6.195 No additional mitigation is required beyond securing the oCEMP **[APP-155]** as a Requirement of the DCO.

Decommissioning Phase Impacts:

Positive

6.196 No positive impacts or effects are expected during the decommissioning phase.

Neutral

6.197 Noise levels expected to be lower than during construction.

Negative

6.198 Potential for unacceptable noise if not managed appropriately.

Mitigation required

6.199 No additional mitigation is required beyond securing the oDEMP **[APP-158]** as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.

Air Quality

Summary:

6.200 Air Quality is considered within Chapter 11 of the ES **[APP-047]** and supporting figures and appendices.

6.201 Solar farms generally benefit air quality when compared with fossil-fuel electricity generation. The proposed outline management plans covering construction, operational and decommissioning will mitigate local air pollution and agreed by HDC.

Construction Phase Impacts:

Positive

6.202 No positive impacts or effects are expected during the construction phase.

Neutral

6.203 Compliance with oCEMP and oCTMP will ensure negligible impacts on air quality.

Negative

6.204 Potential dust and emissions if not properly controlled.

Mitigation required

6.205 No additional mitigation is required beyond securing the oCEMP **[APP-155]** and the oCTMP **[APP-156]** as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.

Operational Phase Impacts:

Positive

6.206 While there are no direct local amenity benefits, solar power has significant national and global air-quality and climate benefits compared with fossil-fuel generation, including: No emission of NOx, SO_2, $PM_{2.5}$, PM_{10}, ozone precursors or combustion by-products linked to respiratory and cardiovascular disease; Significantly reduced greenhouse gas emissions (CO_2 , methane), contributing to climate mitigation and associated health benefits such as heat stress, vector-borne diseases and extreme-weather impacts.

Neutral

6.207 No neutral impacts or effects are expected during the operational phase.

Negative

6.208 Potential heat-island effect due to heat absorption and re-radiation.

Mitigation required

6.209 No mitigation required.

Decommissioning Phase Impacts:

Positive

6.210 No positive impacts or effects are expected during the decommissioning phase.

Neutral

6.211 Compliance with the oDEMP will ensure negligible impacts on air quality.

Negative

6.212 Potential dust and emissions if not properly controlled.

Mitigation required

6.213 No additional mitigation is required beyond securing the oDEMP **[APP-158]** as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.

Ground Conditions/Contamination

Summary:

6.214 Ground Conditions are considered within Chapter 12 of the ES **[APP-048]** and supporting figures and appendices. The ES identifies that intrusive investigation will be required where ground disturbance is proposed. Particular attention will be given to former buildings, infilled ponds and the former oil pipeline. The oCEMP **[APP-155]** will set out the required procedures. HDC are also satisfied that there are no significant adverse cumulative effects in terms of land contamination.

Construction Phase Impacts:

Positive

6.215 Potential remediation of contamination associated with former buildings, infilled ponds and the former oil pipeline.

Neutral

6.216 No neutral impacts or effects are expected during the construction phase.

Negative

6.217 Potential spillage fuels, oils and lubricants from plant and machinery. Potential soil degradation through compaction, erosion or changes to soil hydrology affecting runoff or drainage patterns.

Mitigation required

6.218 Investigation and remediation (as necessary) of potential contamination at former buildings, infilled ponds and the former oil pipeline, secured through oCEMP **[APP-155]**, Outline Soil Management Plan **[APP-161]** and Outline Waste Management Plan (oWMP) **[APP-164]** as a Requirement of the DCO.

Operational Phase Impacts:

Positive

6.219 No positive impacts or effects are expected during the operational phase.

Neutral

6.220 No neutral impacts or effects are expected during the operational phase.

Negative

6.221 Potential contamination from broken panels (e.g. lead, tin, cadmium), transformer oils or cleaning chemicals.

Mitigation required

6.222 Written operational procedures for dealing with liquid spillages and broken panels.

Decommissioning Phase Impacts:

Positive

6.223 Soil nutrition and fertility potentially restored. Land may be returned to organic or low-impact arable farming.

Neutral

6.224 No neutral impacts or effects are expected during the decommissioning phase.

Negative

6.225 Potential spillage oils, lubricants or fuels from plant and machinery.

Mitigation required

6.226 No additional mitigation is required beyond securing the oDEMP [APP-158] as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.

Land and Soils

6.227 It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.

Relevant Development Plan policy:

6.228 Policy LP10 states that all development in the countryside must seek to use land of lower agricultural value in preference to land of higher agricultural value.

Summary:

6.229 Land and Soils are considered within Chapter 13 of the ES **[APP-041]** and supporting figures and appendices. The chapter assesses how the Scheme has

the potential to affect land and soil receptors. Effects arising from the construction, operation and decommissioning of the Scheme are reported.

6.230 The assessment of baseline conditions for agricultural land classification (ALC) acknowledges that it is not a complete survey in accordance with the Code of Practice but represented a survey approach discussed with Natural England. Unclassified land has been assumed to be Grade 2 land.

6.231 Information is provided also on soil resources and mineral reserves. Assessment is based on guidelines published by Institute of Environmental Management and Assessment, now known as Institute of Sustainability and Environmental Professionals.

6.232 An agricultural land classification survey, including the grid corridor is the basis for assessment of the effects on land and soil receptors at construction.

6.233 Embedded mitigation is provided in the preparation of an oSMP **[APP-161]**. The plan has been informed by the relevant good practice guidance. It is acknowledged that if the DCO is granted the oSMP will be developed into a detailed SMP and approved prior to construction.

Construction Phase Impacts:

Positive

6.234 No positive effects of construction are identified.

Neutral

6.235 Neutral or negligible effects are recognized in relation to the mineral reserves, which would not be sterilized by the Scheme.

6.236 Negligible construction effects (although described as negligible adverse) are accepted as neutral and identified for each of the four soil types identified within the Scheme. This is based on the resilience of soil types and embedded mitigation.

Negative

6.237 In construction, moderate adverse (significant) effects on Grade 2 agricultural land are identified. This negative effect is a consequence of taking best and most versatile (BMV) land from arable production. Where land survey information is missing, a worst-case effect is assumed, and a moderate adverse effect has been applied.

6.238 Subgrade 3a land is also BMV land. Its removal from arable cropping is assessed as a minor adverse (not significant) effect. Similarly, the removal of Subgrade 3b land (not BMV) from arable farming is identified as a minor adverse effect.

6.239 The areas of permanent and reversible effects are identified in tabulated form, differentiating between ALC grades. Permanent effects are described as BESS, substation, transformers, cabling and access tracks, even though there would be

removal on decommissioning. The Council recognises the potential for permanent diminution of land classification.

6.240 However, permanent effects do not include the area of landscape mitigation planting of hedgerows and trees, which are anticipated to be retained. The oLEMP **[APP-159]** include approximately 19ha of native species woodland and 17.4km of native hedgerows. Whilst this does not negatively affect the soil resources, it increases the removal of BMV land from agricultural production.

Mitigation required

6.241 Mitigation is embedded mitigation provided by the oSMP **[APP-161]** and no additional mitigation is proposed or required.

6.242 Access to 5.4% of the Scheme area was not available. In the absence of data, the EIA assumed the worst-case outcome that the land is Grade 2. This enables assessment of worst-case effects of the Scheme.

6.243 However, the Council considers it important that the data should be available for preparation of a detailed SMP (proposed post consent and to be substantially in accordance with the oSMP). The missing data is required for recognition of soil types, ensuring their protection, and for the segregation of soil types for short-term and long-term storage.

Operational Phase Impacts:

Positive

6.244 A potential beneficial effect to soil resources during the operational phase is recognized resulting from the absence of cultivation of the land and maintenance of permanent vegetation cover. The application of magnitude and sensitivity criteria to the assessment to present a significant beneficial effect is likely to be overstated. The Council considers the potential beneficial effect to be minor and not significant.

Neutral

6.245 Following construction, the residual effect on land classification by grade is negligible and determined to be neutral.

6.246 Operational effects on the mineral reserves remain neutral.

Negative

6.247 No negative effects resulting from operation are identified. Negative legacy effects of construction are possible are not a direct function of operation, but nonetheless mitigation is addressed below.

Mitigation required

6.248 Mitigation will be provided by the SMP, which should include details of monitoring of visual indicators of unhealthy soil conditions and potential remedial action. No other mitigation is required beyond that specified in the oSMP.

Decommissioning Phase Impacts:

Positive

6.249 No positive effects of decommissioning are identified.

Neutral

6.250 It is acknowledged that the effects at decommissioning would be of a broadly similar magnitude of impact to the impacts during construction.

6.251 The decommissioning phase has a neutral effect on mineral reserves.

Negative

6.252 Whilst decommissioning effects in relation to land and soils would largely mirror those in construction the removal of components of the Scheme to include the East Park BESS, substation and cabling recognizes the potential for permanent negative effects to soil condition and by extension land classification.

Mitigation required

6.253 The decommissioning activities would be completed in substantial accordance with the oSMP and oDEMP.

6.254 The survey of missing data required pre-construction (to complete baseline data) will be required to provide restoration outcomes after decommissioning. ALC survey should follow five years after decommissioning. Remedial measures will be required in a new SMP if restoration is incomplete.

Socio-economics, land-use, and tourism

6.255 It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.

Relevant Development Plan policy:

6.256 Relevant Development Plan policies include LP29 (Health Impact Assessment), LP10(c) (effects on the use and enjoyment of the countryside), LP16 (Sustainable Travel), LP17 (Parking and Vehicle Movement) and LP14 (Amenity). Elements of LP3 (Green Infrastructure) are also relevant where impacts relate to recreational access and PRoW.

Summary:

6.257 Socio-economics, Land-use and Tourism matters are considered within Chapter 14 of the ES **[APP-050]**. The chapter assess how the Scheme has the potential to impact the economy, and land-use and tourism receptors through land-take arising from construction activities and for operation of the Scheme; worker

requirements during all phases; changes in access to facilities during construction and decommissioning; and, when any of these impacts act in-combination with those from other developments. Effects will principally arise from employment and related impacts during construction and decommissioning phases and on journeys both for recreation and accessing services and facilities.

6.258 During construction and decommissioning, the Applicant assesses the Scheme as resulting in a significant moderate beneficial effect on the economy at the local level. The Council considers that there is the potential for a positive effect on the economy but appropriate provision must be made to deliver employment and skills benefits/opportunities locally to realise this. The Council therefore seek to maximise potential benefits with regards to the local economy, skills, education and employment opportunities through working with the Applicant and engaging with local stakeholders where appropriate. The Council considers that the Outline Skills Supply Chain and Employment Plan (oSSCEP) currently lacks specific detail on needs addressed, initiatives and a delivery programme to maximise benefits, which the Council requests is addressed.

6.259 The Council requests that further information is provided by the Applicant regarding impacts on services during construction and decommissioning, specifically relating to potential severance of access to healthcare services and mitigation for potential impacts. The Council further considers in respect of recreation that an assessment of impacts on all users of PROW, not only tourism-related PROW use, should be provided to confirm that no significant effects would arise.

6.260 The Council notes that there is no Health chapter in the ES or Health Impact Assessment. The Council would welcome an assessment to demonstrate that their residents' health and wellbeing would not be adversely impacted by the Scheme during all phases of development.

6.261 Finally, during operation, the Council agrees that socio-economics, land-use and tourism effects would be not significant.

<u>Construction Phase Impacts:</u>

Positive

6.262 The Scheme has been assessed by the Applicant as resulting in a significant moderate beneficial effect on the economy at the local level and a not significant minor beneficial effect at a regional level during the construction phase. The Applicant assesses economic impacts in relation to 30-minute and 90-minute drive times from the Site as set out in para14.4.6. However, which effects constitute a local and which constitute a regional level of impact for the purpose of the assessment is not explained. Estimated employment creation is presented for a 90-minute drive time only, with no further breakdown provided to confirm the scale of employment creation within a 30-minutes' drive time, which the Council considers would constitute local impact.

6.263 The Council considers that there is the potential for a positive effect on the economy. However, it is considered that for a significant beneficial effect of moderate scale to be realised as concluded in para14.12.1, appropriate provision must be made to deliver employment and skills benefits/opportunities locally. Without such provision and such provision being secured in the DCO, it considers that the impact on the local economy could be beneficial but of a minor scale.

Neutral

6.264 In regard to tourism, the Scheme has been identified as resulting in negligible effects on tourism during all phases. This includes in respect of impacts on users of PROW and Bridleways. Mitigation measures in the **[APP-160]** Outline PROW Management Plan are referred to which would limit impacts. Para14.4.19 states that effects on PRoW are considered in relation to recreational and tourism use. However, no assessment of impacts on journey length and duration by residents for recreation activity has been presented, only impacts on tourism-related PRoW use. The Council considers that an assessment of impacts on all users of PRoWs should be provided to confirm that no significant effects would arise.

6.265 Impact on local services have been addressed in respect of effects on the visitor accommodation sector from potential use of these facilities by construction workers. Effects on other services have not been identified in the ES. In its assessment of impacts on private and community assets, the Applicant makes reference to impacts on access to and from economic assets, concluding that effects would be negligible, however community facilities do not appear have not been assessed for this impact. The Council considers there to be potential for effects in terms of severance of access to facilities, subject to the completion and findings of junction counts and assessments requested in the Highways aspect of this representation. Specifically the Council considers there to be the potential for impacts on healthcare services, and request that the Applicant provides information if no impacts are expected justifying why this will be the case, with reference to any mitigation measures as appropriate.

6.266 The Council notes that there is no Health chapter in the ES or Health Impact Assessment. The Council would welcome an assessment to demonstrate that their residents health and wellbeing would not be adversely impacted by the Scheme during all phases of development.

Negative

6.267 No negative socio-economics, land-use and tourism effects arising from construction of the Scheme have been identified.

Mitigation required

6.268 Relevant to its assessment of beneficial effects on the local economy, the Applicant's **[APP-163]** Outline Skills Supply Chain and Employment Plan (oSSCEP) sets out a strategy to maximise local employment, skills development and supply chain opportunities. The Council welcomes that the Applicant has prepared an oSSCEP. However, the Council considers that this currently lacks specific detail

with regards to existing local skills gaps and current levels of provision, and on specific initiatives which are tailored to addressing local employment issues and need. Detail of these should be provided in the document along with informed measures and outputs for delivering appropriate local employment and skills benefits/opportunities. A route map for developing the oSSCEP further should also be provided, for example, it is not clear on the timeline for developing the strategy when stakeholder engagement will take place and how regular this will be.

6.269 Pending consideration of impacts on access to healthcare facilities by the Applicant, where impacts are identified or have the potential to arise, appropriate mitigation measures should be identified to reduce, minimize or avoid impacts on the local community.

Operational Phase Impacts:

Positive

6.270 The Scheme has been assessed by the Applicant as resulting in a not significant minor beneficial effect on the economy at both the local level and regional levels. As noted above for construction impacts on the local economy, what constitutes local and regional impact levels for the purpose of the assessment is not explained in the chapter. Notwithstanding this, the Council agrees that effects would be not significant.

Neutral

6.271 Neutral or negligible effects during operation are recognised in relation to tourism, private and community assets and development land.

Negative

6.272 No negative socio-economics, land-use and tourism effects arising from operation of the Scheme have been identified.

Mitigation required

6.273 No negative socio-economics, land-use and tourism effects arising from operation of the Scheme have been identified.

Decommissioning Phase Impacts:

6.274 As described for construction.

Climate change

6.275 It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.

Relevant Development Plan policy:

6.276 LP35 (Renewable and Low Carbon Energy) is the primary policy relevant to climate change, as it sets the Council's approach to renewable and low-carbon energy development. Elements of LP5 (Flood Risk) and LP15 (Surface Water) are also relevant where climate change affects future rainfall, drainage and resilience.

Summary:

6.277 The Scheme will result in a range of climate related impacts across construction, operation, and decommissioning.

6.278 Consistent with assessments undertaken for comparable NSIPs, construction and decommissioning phases are expected to generate negative greenhouse gas (GHG) emissions, primarily due to plant use, materials production, transport movements and land disturbing activities. No positive or neutral construction phase climate impacts have been identified. During operation, the Scheme would contribute to national decarbonisation objectives by facilitating lower carbon electricity generation, representing a positive climate impact, although some minor negative operational emissions remain unavoidable. The GHG assessment has been undertaken in line with ISEP guidance and sets out the beneficial impact of the Scheme overall in terms of contributing to UK's net zero goals.

6.279 In relation to climate resilience, construction and decommissioning activities may be temporarily exposed to climate related hazards, such as extreme rainfall, heat events or high winds, representing negative short term resilience impacts. However, these do not influence the Scheme's long term climate performance. Operationally, the infrastructure may experience climate driven stressors linked to future temperature increases, wind loading, or precipitation intensity. These impacts were assessed in line with guidance issued by ISEP and found there to be no significant negative impacts if mitigated in line with embedded mitigations.

6.280 With respect to Inter related Climate Change Impacts (ICCI), the Scheme may experience interactions between future climate conditions and environmental, social or operational topics, including drainage, landscape condition, biodiversity sensitivity, soil stability and welfare considerations for site personnel. These interactions constitute negative impacts across all phases unless appropriately mitigated as set out through the assessment. No positive or neutral ICCI effects were identified.

6.281 Across all three assessments, effective mitigation—secured through the CEMP, OEMP and future Decommissioning Plans—is essential to reducing impacts. Required measures include low carbon construction practices, efficient logistics, climate resilient design specifications, extreme weather contingency protocols, and cross topic adaptation measures for drainage, soils and ecological management.

Construction Phase Impacts:

Positive

6.282 No positive climate impacts arising from construction have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment.

Neutral

6.283 No neutral climate impacts arising from construction of the Scheme have been identified in the GHG Assessment, CRA or ICCI Assessment.

Negative

6.284 For the GHG Assessment, construction activities will generate greenhouse gas emissions from plant, materials manufacture, transport, and land disturbance. These emissions represent a negative impact on climate during the construction period.

6.285 There are no negative impacts anticipated in the CRA or ICCI as working practices are anticipated to be able to adjust over the short construction period.

Mitigation required

6.286 For the GHG Assessment, embedded and additional mitigation actions have been set out in paragraphs 15.7.3 and 15.9.2 respectively. These actions should be embedded and tracked throughout the design process.

6.287 The oCEMP sets out mitigation measures for the CRA and ICCI. These actions should be embedded and tracked throughout the construction process.

<u>Operational Phase Impacts:</u>

Positive

6.288 For the GHG Assessment, the Scheme will contribute to national decarbonisation objectives by supporting low carbon electricity generation, resulting in long term positive climate outcomes consistent with NPS EN 1.

6.289 No positive climate impacts arising from operation have been identified in the CRA or ICCI Assessment.

Neutral

6.290 No neutral climate impacts arising from the operation of the Scheme have been identified in the GHG Assessment, CRA or ICCI Assessment.

Negative

6.291 For the GHG Assessment there are negative impacts on the climate from GHG Minor operational emissions, these are mostly resulting from replacement of equipment throughout the lifecycle of the Scheme. These emissions are exceeded by the offsetting benefits of low-carbon energy generation from the Scheme.

6.292 For the CRA there are negative impacts to the proposed development from climate change. These comprise impacts to operational equipment, vehicle access to the

scheme, and on-site workers. These effects are all assessed to be slight/negligible and not significant.

Mitigation required

6.293 Operational emissions should be minimized through maximizing the lifecycle of components, and sourcing low carbon materials in replacement via the OEMP for mitigating GHG emissions.

6.294 No additional mitigation is required for the CRA or ICCI assessments.

Decommissioning Phase Impacts:

Positive

6.295 No positive climate impacts arising from decommissioning have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment.

Neutral

6.296 No neutral climate impacts arising from decommissioning of the Scheme have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment.

Negative

6.297 Decommissioning activities, including dismantling, transport, plant use, and material processing, will generate greenhouse gas emissions comparable to construction works and therefore constitute a minor, not significant, negative climate impact.

6.298 There are no negative impacts anticipated in the CRA or ICCI as working practices are anticipated to be able to adjust over the short decommissioning period.

Mitigation required

6.299 No additional mitigation is required for decommissioning for the GHG assessment. The oDEMP sets out mitigation measures for the CRA and ICCI. These actions should be embedded and tracked throughout the decommissioning stage.

Cumulative and In-Combination Effects

6.300 With regard to cumulative impacts, the Council notes that these are limited to those identified in the relevant ES chapter and otherwise addressed within the individual technical chapters of the ES. The Council has reviewed the cumulative impacts within each topic area as set out in the preceding sections of this Local Impact Report. On this basis, the Council considers that the Applicant has assessed cumulative impacts across the affected environmental and technical areas to an appropriate level to enable a robust assessment of the Scheme's cumulative effects.

Other matters

Draft Development Consent Order:

6.301 Detailed comments on the Draft Development Consent Order (DCO) **[PDA-005]** relating to topic-specific environmental and technical matters are addressed within the relevant sections above. This section sets out additional points of principle regarding the drafting and structure of the DCO. These matters closely align with the concerns raised by the other Host Authorities, CCC and BBC in their respective Relevant Representations, which are referenced where applicable.

6.302 HDC supports the position set out in CCC's Relevant Representation (para. 14.2) **[RR-150]**, which notes that Schedule 2 of the Draft DCO refers to "the local planning authority" without distinguishing between the authorities affected. As the scheme spans multiple administrative areas, including a two-tier system in Cambridgeshire and a separate authority in Bedfordshire, CCC advises that each Requirement should clearly specify which authority or authorities are responsible for discharging it.

6.303 HDC concurs with the concerns raised by BBC (paras. 3.5(a)–(b)) **[RR-111]**, which note that Schedule 1 of the Draft DCO does not sufficiently distinguish between Principal Development and Associated Development.

6.304 HDC supports BBC's position (para. 3.11) that the Draft DCO must clearly define the terms "temporary" and "permanent" to ensure clarity across construction, operation and decommissioning.

Replacement Phase:

6.305 The Council notes that no comprehensive or stand-alone assessment has been provided of the potential impacts associated with the Replacement Phase of the Scheme. This concern has previously been raised by BBC in its Relevant Representations (paragraph 3.14), and the Council considers that the Replacement Phase warrants further review and assessment given the 40-year operational period and the likelihood of replacement cycles for both the solar and BESS infrastructure.

6.306 Paragraph 2.4.10 of the oOEMP **[APP-157]** states that, prior to any replacement activities involving more than 20% of solar panels, the operator must submit a notification to the relevant Local Planning Authority with details of the management measures to be put in place. The Council has several concerns with this approach.

6.307 First, the provision does not prevent the operator from undertaking replacement activities in multiple smaller increments such that the 20% threshold may never be triggered. As drafted, it also fails to specify the timeframe within which the 20% threshold is calculated. It is therefore unclear whether this is intended to apply per year, per replacement cycle, over a 5-year period, or across the entire operational

life of the Scheme. Without a temporal definition, the trigger is ambiguous and likely unenforceable. Furthermore, no technical or operational rationale has been provided to explain why 20% represents an appropriate threshold.

6.308 Lastly, the Council notes that the notification requirement for replacement activities is contained only within the oOEMP and is not secured through a Requirement in the draft DCO **[PDA-005]**. This is insufficient.

6.309 The Council suggests that the Replacement Phase needs to be a defined phase within the DCO itself so that associated triggers for the relevant Management Plans flow from a requirement secured within the DCO.

7. CONCLUSION

7.1 This LIR has assessed the likely local impacts of the East Park Energy DCO Scheme within HDC's administrative area. The Council recognises the national need for renewable and low-carbon energy infrastructure and therefore supports the principle of development in accordance with national policy.

7.2 However, as is typical for a scheme of this scale and nature, the assessment identifies a range of negative local impacts across several technical topic areas. These negative impacts give rise to varying degrees of tension with aspects of the Development Plan, particularly in relation to landscape and visual effects, the use of Best and Most Versatile (BMV) agricultural land, ecological impacts, the impact on heritage assets, and the adequacy of long-term management and monitoring arrangements.

7.3 The Council does not undertake a planning balance within this report. The LIR presents the local impacts (positive, neutral and negative) based on the evidence before the authority as of Deadline 1. The Council reserves the right to submit further Written Representations during the Examination to address updates, clarifications, or amendments to the Scheme proposals and associated documents.

7.4 In summary, HDC considers that further information, clarification, and/or securing mechanisms are required to ensure that the impacts of the Scheme are minimised and appropriately controlled. These include, but are not limited to:

- Additional commitments on landscape mitigation and hedgerow height management during operation and following decommissioning.
- Provision of additional survey data, mitigation detail and cross-referencing in relation to ecology, including ground-nesting birds, bats, hazel dormouse, water vole, otter and great crested newt.
- Clarification of potential hydrological and access impacts on County Wildlife Sites (Huntingdon Wood CWS, High Wood CWS, Kangaroo Meadows CWS), including shading effects.

- Clarification and securing of BNG outcomes, including a post-development BNG spatial plan showing interaction between solar infrastructure and proposed habitats.
- Long-term habitat management commitments beyond the 40-year operational period.
- Strengthening of the oLEMP in relation to buffer widths, grassland establishment methods, veteran tree protection and species-appropriate planting lists.
- A holistic biodiversity monitoring plan covering habitat condition, species and ecosystem function, together with commitment to an appropriate monitoring fee for BNG, ecology and landscape mitigation.
- Lighting measures to be secured as a Requirement within the draft DCO.
- Assessment of the impact to the Grade II* listed Warren House.
- Full consideration and assessment of Replacement Phase impacts and securing an enforceable mechanism in the DCO.
- Completion of missing ALC baseline survey data prior to detailed SMP approval.
- Assessment of impacts on all users of PRoW (not only tourism-related use) and impacts on access to healthcare facilities.
- Additional detail and securing of commitments within the oSSCEP.
- Resolution of outstanding matters raised by the LLFA and the EA in relation to flood risk and drainage.
- Amendments to the draft DCO.

7.5 Subject to the resolution of the matters set out in this LIR, the Council will continue to work constructively with the Applicant, the Examining Authority, and the other Host Authorities to assist in the Examination of the Scheme.

7.6 Having regard to the above, the table below provides a high-level summary of the impacts by topic, also taking account of any cumulative impacts related with that topic:

Table 1. High Level Summary of Positive, Neutral and Negative Impacts

Topic	Positive	Neutral	Negative	Development Plan Policy
Landscape and Visual			X	LP10, LP35, GSNP7
Ecology and Nature Conservation	X		X	LP30, GSNP11
Biodiversity Net Gain	X		X	LP30, GSNP11
Flood Risk and Drainage		X		LP5, LP15, GSNP15
Heritage Impacts			X	LP34, GSNP10

Noise and Vibration		X		LP14, LP10(c)
Air Quality		X		LP36
Ground Conditions/Contamination		X		LP37
Land and Soils	X		X	LP10
Socio-economics, land-use, and tourism	X	X		LP29, LP10(c), LP16, LP17
Climate change	X		X	LP35, LP5, LP15