

Cambridgeshire County Council

East Park Energy Project

Planning Inspectorate Reference: EN010141

Written Representation

7th April 2026

1 Introduction

- 1.1 Cambridgeshire County Council (CCC or 'council') is a host authority for the East Park Energy project seeking a Development Consent Order (DCO). The other host authorities are Bedford Borough Council and Huntingdonshire District Council. Each authority will be submitting individual Written Representations to ensure that the Examining Authority (ExA) is fully informed of the matters of concern to those authorities.
- 1.2 CCC provided Relevant Representation (RR) [RR-150]. Accompanying this submission for Deadline 1 is a Summary of Relevant Representation and the Local Impact Report (LIR). The council's Relevant Representation, and Local Impact Report provides the detailed technical review of the project.
- 1.3 This written representation provides a succinct and coherent presentation of the issues and avoids undue duplication. It should be read alongside the detailed technical submission that forms the Local Impact Report LIR. The matters raised in the RR by CCC remain relevant and should also be referred to.
- 1.4 CCC has a number of concerns proposal as it currently stands and considers changes are needed before development consent should be granted.
- 1.5 The Council acknowledges that the proposed Scheme would provide some benefits. These include:
 - Overall reducing net GHG emissions and contributing to net zero polices.
 - Biodiversity Net Gain
- 1.6 Notwithstanding the above, the Councils would emphasise to the ExA that they are of the opinion that any potential benefits of the Scheme are not sufficient or there is a lack of assurance of delivery to mitigate the negative impacts of the scheme.
- 1.7 The main topics of concern for the Council, are listed below:
 - Archaeology - Further appropriate intrusive evaluation via trial trenching is needed.
 - Roman Town – Haulage track and evidence proposals fully mitigate the risk of damage due to compaction.
 - Climate and Carbon - Applicant needs to demonstrate minimising the greenhouse gas emissions for the lifecycle of the project, especially from embodied carbon of equipment/material.
 - Hydrology – More information is needed to demonstrate that the proposals are acceptable with respect to surface water drainage and flood risk.
 - Battery Energy Storage Site (BESS) - To include ability to capture all water on site in response to a fire.
 - Cumulative impact - To consider all solar and battery development delivered and planned in the local area.
 - Ecology – baseline surveys need to be completed to inform the assessment of impacts to habitats and species.

- Wildlife sites - Need to adequately assess the potential impact on wildlife sites, protected / priority species or habitats in the area.
- Nesting Habitats – Concern related to adverse impact on nesting habitat for ground nesting birds.
- Retention of habitats after decommissioning.
- Mental Health – deliver green corridors with Public Right of Way's (PROW) to support mental wellbeing.
- Highways - More information to show accesses to sites from the highway are viable and deliverable.
- Public Rights of Way (PROW) - Suggestion of a new PROW and improvements existing to mitigate the visual impact to users.
- Replacement and recycling of infrastructure - More detail is needed to the at scale replacement of solar and batteries and considered a separate phase.

2 Landscape and Visual

- 2.1 The Proposed Development will have a significant adverse impact on the landscape and visually amenity. Cambridgeshire County Council's comments are limited to Public Rights of Way (PROW) and impact to non-motorised users using the local PROW network.

3 Cultural Heritage and Archaeology

- 3.1 The council requests further details and assurance mitigations for Site C and the roman town scheduled monument will preserve the significant archaeological remains.
- 3.2 The trial trenching report for Site C is excellent and provides considerable detail. The Site D report is interim in nature with the assessment of effects in the Environmental Statement (ES) relatively poorly informed. Note parts of the cable route have not been assessed.
- 3.3 The use of concrete blocks in some areas of particularly complex archaeological remains is not suitable due to the potential for compression damage. Archaeological monitoring is not a suitable mitigation for most areas intrusive evaluation via trial trenching will be needed.
- 3.4 The council supports the undertaking that the outline Archaeological Mitigation Strategy (oAMS) covers the lifetime of the scheme, including decommissioning, and that its implementation will be overseen by an Archaeological Clerk of Works. The council welcomes proposals to fund further work into archaeological assets.

4 Ecology and Nature Conservation

- 4.1 The proposed scheme will retain all woodland and the majority of hedgerows in Cambridgeshire (only 24m hedgerow will be lost). It will also result in additional woodland, hedgerow, species-rich grassland and enhancement of watercourses. However, confirmation that other notable habitats will be retained and incorporated into the landscape design is yet to be agreed some opportunities to maximise biodiversity value have been missed.
- 4.2 The council is concerned that the EA is based on incomplete ecological survey work (including habitat / flora, bat, water vole, great crested newt, wintering birds) and it is not always possible to determine ecological baseline for Cambridgeshire. There is a lack of clarity and contradictions on the drawings / documents or missing information. Some ecological receptors have not been identified or sufficiently considered, including those for Huntingdon Woods Ancient Woodland / County Wildlife Site, watercourses and protected species (e.g. lighting and water pollution).
- 4.3 The proposed biodiversity mitigation / compensation has not been adequately incorporated into other submission documents and insufficient evidence has been provided to demonstrate that protected species licence(s) can be obtained.
- 4.4 The council is concerned that the scheme will have an adverse impact on ground nesting birds of open countryside, including skylarks (population of county importance) and lapwing, by removing nesting habitat.
- 4.5 The assessment of biodiversity net gain (BNG) is not accurate given the incomplete baseline surveys, lack of habitat condition assessments, exclusion of some post-development habitats, and does not adequately reflect the temporary nature of the project. Watercourse BNG units needs to deliver minimum 10% net gain which is not demonstrated in the application.
- 4.6 Post development habitats (e.g. watercourse enhancement to River Kym tributary) and some opportunities to maximise biodiversity value need to be included in the Outline Landscape and Ecological Management Plan [APP-159]. The council also seeks further discussions about the proposed planting etc. to ensure it is appropriate to Cambridgeshire and the council.
- 4.7 The council welcomes the establishment of a Steering Group to oversee the implementation of the Landscape and Ecological Management Plan (LEMP).

5 Hydrology and Flood Risk

- 5.1 The approach to the drainage strategy is supported in principle, however, insufficient information has been provided to demonstrate that the proposals will not increase flood risk elsewhere. Hydraulic calculations and drainage layouts are asked to be shared before the LLFA is able to confirm the proposals are acceptable with respect to surface water drainage and flood risk.
- 5.2 The council supports culverting being avoided where possible.

6 Traffic and Transport

- 11.1 The council, in its role as Local Highway Authority (LHA), seeks that all works within the adopted public highway are agreed with the applicant with appropriate approval and monitoring of works. Protective provisions for the LHA are sought to be included in the DCO.
- 11.2 The applicant should use the Design Manual for Roads and Bridges (DMRB) when assessing accesses and the council asks for raw data to be shared so to review each access. Temporary Traffic Regulation Orders need to be agreed with the councils Street Works department.
- 11.3 Fully dimensioned plans of each access including all relevant dimensions, widths and radii, along with tracking showing two-way (simultaneous) movements of the largest vehicles which will use them. Tracking movement from accesses along the highway to ensure the highway is of sufficient nature to cater for the two way movements of construction vehicles is also requested.
- 11.4 Temporary weight restriction suspension in the council's view would not be required as a weight restriction allows access to a property or development for access. Temporarily removing this weight restriction would open the area to non-construction related heavy vehicles allowing them to use the surrounding roads which the council would not support.
- 11.5 There are no significant concerns in respect of the volume of traffic during the construction period with peak hours avoided. However, there does not appear to be a routing management plan for the general Heavy Goods Vehicle (HGV) traffic with the exception of Abnormal Indivisible Loads (AILs). More certainty as to the monitoring and enforcement of the routing is needed.
- 11.6 To avoid haulage traffic through a residential area it is suggested any vehicles travelling southbound on the A1 to access the B645 would continue southwards to the Wyboston junction and then return northwards to the A645 junction.
- 11.7 The staff occupancy is proposed to be 2 persons per car is welcome the council would like to see more detail as to the measures to reach this and further measures to implement if 2 persons per car is not met.
- 11.8 There are no new permissive pathways in Cambridgeshire and no defined improvements to existing PROW as part the application. There are significant visual impacts for users of PROW. The council requests that the applicant proposes new permissive paths to connect communities and connect existing PROW networks including enabling a wider network of routes for cyclists and equestrians.
- 11.9 The council requests that the applicant seeks alternatives to using PROW for permanent vehicular access.
- 11.10 The council requests that reference in the DCO which allows unspecified changes to public rights of way is removed.

12 Noise and Vibration

- 12.1 As it relates to public rights of way equestrian users it is requested that any inverter buildings near public rights of way be constructed to minimise transfer of sound so that horses are not unsettled by any noise that this equipment may cause.

13 Land and Soils

- 13.1 The applicant needs to evidence the economic impact associated with the agricultural industry and the scheme's impact on agricultural production in the area.
- 13.2 The Outline Decommissioning Environmental Management Plan (oDEMP) needs to identify sections of underground infrastructure that poses a risk of adverse environmental impacts if extracted to justify being left in situ. All other sections should be removed. A record of that left in situ should be shared with the Minerals and Waste Planning Authorities.

14 Socio Economics, Land Use and Tourism

- 14.1 Clear apprenticeship and skills acquisition opportunities for local people included in the Outline Skills Supply Chain and Employment Plan [APP-163].
- 14.2 The applicant is advised to liaise with the Community Safety Partnerships to mitigate unintended consequences of the project on local communities.
- 14.3 The council encourages further engagement to help deliver the community benefit fund.

15 Climate Change

- 15.1 Assurance that measures to minimise Greenhouse Gas (GHG) by embedded mitigation and enhancement do get implemented is required.
- 15.2 More detail is needed to the approach to be taken should peat be found, and a commitment to re-calculation of the scheme's carbon benefit should be made.
- 15.3 Climate Resilience should be kept under review through the lifespan of the project, should climate risks emerge or become more acute than is currently modelled.

16 Other Environmental Topics

- 16.1 The council welcomes the assessment of the project's impacts on the established 'wider determinants of health' found in [APP-052]. Two health pathways should be considered further, the opportunity to deliver green corridors with Public Right of Way's (PROW) to deliver open space leisure and play, and the management of the BESS site in terms of community safety.

- 16.2 It is essential to safeguard against potential health inequalities and keep all stakeholders accountable to approved standards of practice.

17 Cumulative and In Combination Effects

- 17.1 The council considers the cumulative visual impact of this scheme in conjunction with existing and planned solar schemes in the local area, particularly near to site D to be a key concern. The council refers to Huntingdonshire's Relevant Representation that questions the conclusion by the applicant of there being a non-significant effect on Huntingdonshire Local Character Area (LCA).

18 Other comments

- 18.1 The council would like at scale replacement of PV panels and batteries to be recognised as a distinct phase separate to operation. Appropriate assessment of traffic, and the impact on biodiversity, noise, air quality, employment and socio-economic matters will need to be made and shared with the local planning authorities for approval ahead of works starting to ensure appropriate mitigations are in place.