Local Impact Report – East Park Energy DCO

EN010141

Cambridgeshire County Council

7th April 2026

Contents

Glossary of Acronyms

BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
CCC	Cambridgeshire County Council
CEMP	Construction Environmental Management Plan
CPCA	Cambridgeshire and Peterborough Combined Authority
CPLRF	Cambridgeshire and Peterborough Local Resilience Forum
CPO	Compulsory Purchase Order
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
DMMO	Definitive Map Modification Order
ES	Environmental Statement
ExA	Examining Authority
FRA	Flood Risk Assessment
GHG	Greenhouse Gases
GLVIA	Guidance for Landscape and Visual Impact Assessment
HERCS	Housing Estate Road Construction Specification
HGV	Heavy Goods Vehicle
HWICS	Health and Wellbeing Integrated Care Strategy
IDB	Internal Drainage Board
IPCC	Intergovernmental Panel on Climate Change
LCWIP	Draft Local Cycling and Walking Infrastructure Plan
LEMP	Landscape and Ecology Management Plan
LHA	Local Highway Authority

LIR	Local Impact Report
LLFA	Lead Local Flood Authority
LNRS	Local Nature Recovery Strategy
LTP	Local Transport Plan
LTCP	Local Transport and Connectivity Plan
LVIA	Landscape and Visual Impact Assessment
MWLP	Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021
MWPA	Minerals and Waste Planning Authority
NCR	National Cycle Route
NG	National Grid
NMU	Non-motorised User
NPPF	National Planning Policy Framework
NPS EN	National Policy Statement for Energy
NSIP	Nationally Significant Infrastructure Project
PINS	Planning Inspectorate
PROW	Public Rights of Way
ROWIP	Rights of Way Improvement Plan
RR	Relevant Representation
S106	Section 106 legal agreement
S278	Section 278 Highways Agreement
SPA	Special Protection Area
TA	Transport Assessment
WHO	World Health Organisation
WRAP	Waste Resources and Action Programme

1 Overview

Introduction

1.1.1 This report constitutes the Local Impact Report by Cambridgeshire County Council (and referred to in the remainder of this report as 'CCC' or 'the council'), for the proposed East Park Energy, a Nationally Significant Infrastructure Project (NSIP). CCC is one of three Host Authorities, the other two being Bedford Borough Council and Huntingdonshire District Council. Each authority will be submitting separate Local Impact Reports (LIRs) covering the impacts specific to their administrative area and technical specialisms. CCC has co-ordinated with Bedford Borough Council and Huntingdonshire District Council to ensure all three LIRs collectively provide a complete assessment of the projects impact.

1.1.2 CCC is the upper-tier local authority for the county of Cambridgeshire as a whole and has a variety of statutory responsibilities to provide services and discharge regulatory functions, which affect a great many aspects of the built, natural, and social environments. These functions include acting as local highway authority, traffic authority, transport authority, waste planning authority, waste regulation authority, minerals planning authority, county planning authority, lead local flood authority, fire authority (including public safety), public health authority, education authority, and social services authority. CCC also holds responsibility for maintaining the Definitive Map and the Historic Environment Record.

1.1.3 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'.

1.1.4 The council has considerable experience of the NSIPs planning regime. The council is currently a host authority for more than 10 NSIPs, from pre-application through to construction and operation.

Purpose and Structure of this report

1.2.1 This report does not describe the proposed development itself but relies on the Applicant's detailed description of the development, as set out in the DCO application documents.

1.2.2 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."

1.2.3 This report describes the impacts of the proposed development under headings by topic, which follow the topics and order set out in the Applicant's Environmental Statement (ES). The key issues and impacts for the council and the local community are identified for each topic, followed by commentary on the impact of the proposal

with reference to the application documentation, including the DCO articles, requirements, and obligations.

1.2.4 For each topic area, this report sets out:

- Local policy context
- The positive, neutral, and negative impacts as anticipated by the council of the development during each phase of the development as defined by the Applicant (construction, operation, and decommissioning).
- The suitability and adequacy of the measures proposed by the Applicant to avoid, reduce, mitigate, or compensate for the identified impacts
- Where applicable, proposals by the council for alternative or additional measures to better address the identified impacts, and,
- The need for obligations and requirements to secure mitigation measures.

1.2.5 The Council considers a further phase of works needs to be accounted for, the at scale replacement of PV panels and batteries. Both are anticipated to need replacing at a point during the operation of the scheme. In doing so this will be a further phase similar to construction with the need for employment, deliver of new equipment as well as the removal and processing of redundant PVs and batteries. The impact to the local communities will be significant over this time. For the purposes of this LIR, impacts by the at scale replacement of PVs and batteries is included as part of operation as currently defined in the application.

1.2.6 The contents of this report builds upon the Relevant Representation (RR) response submitted by CCC 16th January 2026 [RR-150].

Description of the Area

Natural and Built Environment

1.3.1 The natural and built environment in the area around the site for the proposed solar energy farm has a set of characteristics which draw from the combination of the landscape, geology, ecology, cultural heritage, and historic designations. These are important at international, national, and local levels and it is this complex interlocking background that sets the scene for the key issues upon which the Councils will consider the impact of the development on the area.

1.3.2 East Park Energy is on the Cambridgeshire, Bedfordshire border with sites A and B in Bedfordshire and C and D in Cambridgeshire. The immediate area is rural in nature predominantly consisting of agricultural fields with associated hedgerows, ditches and some wooded areas.

1.3.3 There are a number of villages in close proximity to the project. To the east is the nearest town of St. Neots. Bedford is 13 mile southwest of the site, and Cambridge

19 miles east. The sub-regional centres of Bedford (to the south), Huntingdon (to the northeast) and Cambridge (to the east) have considerable influence on the area in terms of employment, education, retail, and health provision.

1.3.4 There are no international statutory environmental designations within the Order Limits. There are a number of Sites of Special Scientific Interest (SSSI) within 5KM of the site, and County Wildlife Sites within 2KM of the site.

1.3.5 The majority of the site is in flood zone 1. To note the River Kym runs through part of the site, south of Great Staughton near to the scheduled monument. Flood zones 2 and 3 are near to the river.

Transport

1.3.6 The immediate area of the project is served by the B645 from which a number of roads link to villages north and south of the project. The A1 to the east of the project runs north to south linking with the A428 towards Cambridge, and the A421 towards Bedford to the south of St. Neots. The A1 links to the A14 to the north and A1M to Peterborough.

1.3.7 There are a number of public rights of way (PROW) within the project with connections to the wider network. These consist of footpaths and bridleways. It is worth noting there are also some Definitive Map Modification Order (DMMO) applications pending a decision to allocate within the projects solar array.

Other relevant development in the area

1.3.8 There is solar development that has taken place in the local area. Little Staughton Solar Farm, Kimbolton Road, Hail Weston, and Little Staughton Airfield.

Statutory Development Plans

1.4.1 The Planning Inspectorate guidance on preparing LIRs suggests that it is useful to set out relevant local plan policies and provide an appraisal of the proposed projects compliance to policies.

Huntingdonshire District Council Local Plan

1.1.2 For the part of the project in Cambridgeshire, the relevant development plan is the Huntingdonshire District Council Local Plan. (Note an updated version to 2046 is currently being drafted). Details of the relevant development local plan policies are detailed in Huntingdonshire District Council's LIR. Where appropriate reference is made to specific development local plan policies in section 2, impacts by issue, of this LIR.

Cambridgeshire and Peterborough Minerals and Waste Local Plan

1.4.3 Cambridgeshire County Council is the planning authority responsible for minerals and waste in Cambridgeshire. The Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021 can be found in Annex 2 of this LIR. Relevant policies are detailed and referred to in the appropriate sections of this LIR.

Other Relevant Local Policy

Cambridgeshire County Council Vision and Strategic Framework 2026-27

1.5.1 The Strategic Framework 2023-2024 sets out CCC's vision and corporate ambitions. It is approved by the Full Council of its democratically elected joint administration. All Council decisions and policies are made within the context of this Framework.

1.5.2 CCC's Strategic vision is for a: "A healthy, fair and sustainable Cambridgeshire." The Strategic Framework guides how the council plans, prioritises and allocates resources in the coming years, ensuring a continued focus on core duties while investing in long-term improvements for communities across the county.

1.5.3 To deliver this vision, the Council will, be focussed on three ambitions:

- Support a green and sustainable county
- Enable full, healthy lives for all
- Ensure fairness and opportunity wherever we can

CCC's Climate Change and Environment Strategy 2026-2028 (published January 2026)

1.5.4 This Strategy outlines CCC's vision in relation to climate change and environment and informs all of the Council's work. It is available to view in full on the County Council's public-facing website[1]. It:
"…sets out an ambitious plan to cut emissions, strengthen resilience, and restore natural ecosystems - while ensuring every action delivers real health and wellbeing benefits for our communities…Cambridge is a globally recognised city, and this reputation delivers significant economic benefits both across Cambridgeshire and nationally. While it leads the way in cutting-edge technology and innovation, the vision for Cambridge is also to be a clean, green, and modern hub. At the same time, the Fens play a vital role in national food production and are a cornerstone for agritech innovation, making the region essential for both food security and future farming technologies To attract businesses and industries, we must offer an environment that is not only innovative but also vibrant, sustainable, and a great place to live. This Strategy is about safeguarding our future. It is about ensuring Cambridgeshire remains a place where people and nature can succeed together. We will lead by example, but we cannot do it alone - everyone has a role to play."

[1] Climate Change and Environment Strategy - Cambridgeshire County Council
https://www.cambridgeshire.gov.uk/residents/climate-change-energy-and-environment

1.5.5 The Strategy outlines the councils ambition to deliver “net zero carbon emissions for Cambridgeshire by 2045 while supporting our communities and nature to adapt and thrive as the climate changes”. The council aims to achieve this through:

Improving Services: We’re making our services more efficient, climate-friendly, and resilient: saving money, reducing emissions, and preparing for future climate impacts. This includes better use of our buildings and resources, supporting colleagues with the right tools, training, and equipment, and embedding climate adaptation into service planning to build long-term resilience.

Enhancing Health and Wellbeing: Well designed and delivered climate and nature action can mean warmer homes, cleaner air, and more green spaces. We’re backing projects like home energy efficiency retrofits, community energy and nature-based solutions that improve everyday life.

Supporting Local, sustainable Growth: We’re helping to shape a local economy that’s low-carbon and future-ready. Projects like the energy infrastructure planning will support greener homes, businesses, and transport - ensuring we can meet future energy demands, provide lower cost energy and energy security while bringing opportunity for Cambridgeshire businesses.

Working in Partnership: We can’t do this alone. We’re working with local voluntary and charitable groups, businesses, and the wider public sector locally to share ideas, pool resources, and deliver real change - together

“Cambridgeshire Green Infrastructure Strategy[2] (2011)

1.5.6 This Strategy is designed to assist in shaping and coordinating the delivery of green infrastructure in the County to provide social, environmental, economic benefits now and in the future. This Strategy demonstrates how Green Infrastructure can be used to help achieve four objectives:

To reverse the decline in biodiversity

To mitigate and adapt to climate change

To promote sustainable growth and economic development

To support healthy living and well-being

1.5.7 “Green Infrastructure is part of our natural life-support system. It is the network of natural and man-made features such as open spaces, woodlands, meadows, footpaths, waterways, and historic parks, which help to define and to link the communities, villages, towns, and cities of Cambridgeshire with each other and to the surrounding landscape. Green Infrastructure is vital to quality of life for both existing and future residents of Cambridgeshire and is nationally acknowledged as an important element of well- designed and inclusive places.”

[2] Cambridgeshire Green Infrastructure Strategy - Cambridge City Council
https://www.greatercambridgeplanning.org/local-and-neighbourhood-planning/current-plans-the-adopted-local-plans/cambridge-city-council-adopted-development-plan/cambridgeshire-green-infrastructure-strategy

Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy[3] (HWICS)

1.5.8 The HWICS sets priorities to benefit health and wellbeing for residents. In 2022, Cambridgeshire County Council and Peterborough City Council agreed to form a Joint Health and Wellbeing Board. It collaborates with the Integrated Care Partnership, bringing together and creating a stronger local partnership around integrated health and social care.

1.5.9 The overarching mission of "All together for healthier futures" is supported by three overarching ambitions:

Have better outcomes for our children;

Reduce inequalities in deaths under 75 years;

and increase the number of years that people live in good health.

1.5.10 The four priorities of the HWICS are:

Ensure our children are ready to enter education and exit, prepared for the next phase of their lives

Create an environment to give people the opportunity to be as healthy as they can be

Reduce poverty through better employment, skills, and housing

Promote early intervention and prevention measures to improve mental health and wellbeing

Cambridgeshire and Peterborough Local Transport and Connectivity Plan (LTCP)[4]

1.5.11 The Cambridgeshire and Peterborough Combined Authority (CPCA) are the Strategic Transport Authority for Cambridgeshire and Peterborough, and the Local Transport and Connectivity Plan (LTCP) is the Combined Authority's long-term strategy to make transport in Cambridgeshire and Peterborough better faster, greener, and more accessible for everyone.

1.5.12 The LTCP sets out a vision and goals for how transport supports a better future and describes the projects needed to make that new future possible. This includes things like better buses, more train services, less pollution and carbon emissions, and helping more people to cycle and walk.

Cambridgeshire County Council Rights of Way Improvement Plan (2016 Update)[5]

[3] Joint Health and Wellbeing Integrated Care Strategy - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/adults/how-we-work#:~:text=In%202022%2C%20Cambridgeshire%20County%20Council,integrated%20health%20and%20social%20care.

[4] Local Transport and Connectivity Plan (LTCP) - Cambridgeshire and Peterborough Combined Authority https://cambridgeshirepeterborough-ca.gov.uk/wp-content/uploads/CPCA-LTCP-Strategic-Document.pdf

[5] Rights of Way Improvement Plan - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/rights-of-way-improvement-plan

1.5.13 The Rights of Way Improvement Plan (ROWIP) is a statutory document under the Countryside & Rights of Way Act 2000, which forms part of the CPCA's Local Transport Plan 3 (LTP3). The Plan is a strategy document that contains the vision of improved countryside access in Cambridgeshire and builds on the rights of way network to bring benefits to transport, tourism, the rural economy, social integration, health, and the environment.

1.5.14 The ROWIP recognises that demand for access to the countryside is growing and is becoming increasingly important due to its importance to the rural economy, public health and well-being and place-making as well as the significant contribution that the PROW network makes to the active travel agenda. Delivery of the Plan requires a range of functions and organisations to work in partnership to achieve the strategic plans of the ROWIP in co-ordination with the emerging Active Travel Strategy and the LTP3.

1.5.15 The ROWIP's Statements of Action (SOAs) are intended to protect and bring about improvements to the rights of way network and countryside access. The following key SOAs are relevant to this Application:

- SOA2: A safer and health-enhancing activity: Countryside access provision should be safe for users and encourage healthy activities.
- SOA3: 72,500 new homes: new development should not damage countryside provision. Where appropriate, development should contribute to the provision of new links and/or improvement of the existing PROW network.
- SOA5: Filling the gaps: Countryside provision should build on the platform of the historical network to meet the needs of today's users, particularly equestrians, and land managers.

1.5.16 The ROWIP works in partnership with the existing Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy.

The Defra 25 Year Environmental Plan[6] (D25YEP)

1.5.17 The D25YEP sets out the Government's plan to improve the environment within a generation, including details how this is to be achieved. It is this Government's ambition to leave our environment in a better state than we found it. The 25 Year Environment Plan outlines the steps we must take to achieve the ambition. The policies in Chapter 3 concern connecting people with the environment in order to improve health and wellbeing, they seek to enhance people's engagement with the natural world and to address inequalities in access, by opening up the mental

[6] 25-year-environment-plan.pdf (publishing.service.gov.uk)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds.

1.5.18 The Covid pandemic has underlined the important role of nature for our health and wellbeing, particularly for those living in disadvantaged areas, and there is growing evidence to support the many beneficial effects of being outside, including reducing stress and increased physical activity. The relevant actions and outcomes detailed in Chapter 3 include:

"1. Helping people improve their health and wellbeing by using green spaces;

2. Encouraging children to be close to nature, in and out of school; and,

3. Greening our towns and cities."

1.5.19 Through increased engagement with nature, people come to care more about the natural environment and take steps to protect and enhance it. Delivery of the D25YEP outcomes depends upon engaging people with nature and supporting their behaviour change. Through engagement with the local community and provision, the proposed solar energy project has the opportunity to help address the requirements of the Plan.

2 Impacts by Issue

2.1 Landscape and Visual (ES Chapter 5 Landscape and Visual)

2.1.1 The Proposed Development will have a significant adverse impact on the landscape and visually amenity. Whilst Huntingdonshire District Council will be commenting on this in detail, Cambridgeshire County Council's comments under PROW (see paragraph *** of this LIR) address the impact to non-motorised users using the local PROW network.

2.2 Historic Environment (ES Chapter 6 Cultural Heritage and Archaeology)

Summary

2.2.1 The Council expects that any physical impacts or potential physical impacts on archaeological assets be mitigated appropriately, via preservation in situ, or if that is not possible or practicable, preservation by record/archaeological excavation. The applicant's Environmental Statement does take into account the results of all phases of survey, including geophysics and trial trenching, and includes an outline of how impact on assets can be appropriately mitigated, although the Council's assessment of the proposed approach to mitigation in some areas differs from the applicant's (see paras 2.3.4.1 – 2.3.4.3 of this LIR). All mitigation needed should be secured by an appropriate requirement, to require an Archaeological Mitigation Strategy (AMS) based on the submitted outline AMS [APP-166].

2.2.2 The proposed order limits contain archaeological remains of national significance. Impact on these remains should be completely avoided. The Council notes that a proposed temporary access road crosses the scheduled monument of the Roman town at Great Staughton, and, while the construction method is deigned to avoid impact on the archaeological remains, we retain concerns with regard to some impact in the construction phase.

Policy Context

Huntingdonshire's Local Plan

2.2.3 Policy LP 34 concerns Heritage Assets and their settings. It states that proposals need to demonstrate potential for any adverse impacts on the historic environment. Specifically with regard to Archaeology it states that fieldwork evaluation prior to determination may be required to support applications. Preservation in situ of archaeological remains should be ensured where appropriate and possible. If this is not possible provision must be made for comprehensive recording, analysis of the results and publication.

Great Staughton Neighbourhood Plan 2021 to 2036

2.2.4 Policy GSNP10 – Designated and Non Designated Heritage Assets states that a development proposal affecting a heritage asset or its setting be accompanied by archaeological investigations where relevant, and in the event of significant and/or extensive remains being found they be preserved in situ.

Construction Phase Impacts

Positive

2.2.5 Removing the area of the newly designated Roman Town at Great Staughton from arable farming and changing it to open grassland will positively impact the long-term preservation of the asset.

Neutral

2.2.6 Any areas of the development where proposed construction activities will have no physical impact on archaeological remains. These are likely to be limited to areas of open space within the order limits.

Negative

2.2.7 Construction that involves any ground disturbance within the order limits, such as piling for solar arrays, cable trenches, the Battery Energy Storage System (BESS) site, the substation, the cable connection, internal cabling and ancillary infrastructure including access tracks/roads, construction compounds and laydown areas, green infrastructure including tree planting, SuDs and site clearance, has the potential for negative impact on archaeological assets where they exist. The scale of that impact may vary from negligible to major depending on the nature of the activity. Chapter 2 of the ES [APP-038] provides details of the proposed works.

2.2.8 While each pile for a solar PV array is small in size the cumulative effect of thousands across a development site is poorly understood and not fully documented or assessed, due to the lack of decommissioned solar farms available to study. Piling tends of have a proportionately lower impact on large archaeological features such as enclosure ditches, but theoretically a comparatively higher impact on human remains, ephemeral prehistoric pits/posthole, structural remains, or waterlogged remains. Table 2-1 of the ES [APP-038] provides details on construction, including that the piles will be up to 3m deep. Centralised inverters and solar transformers will have strip foundations of up to 0.4m below ground level (Table 2-3 & 2-4) [APP-038],

2.2.9 Excavation of cable trenches will normally reach the depth of the underlying archaeology and can have a major impact, particularly where they are closely grouped together. Table 2-20 [APP-038] shows that cable trenches will be up to 1m deep, with a single circuit up to 0.4m wide. Additional circuits can be laid in parallel in a trench up to 15m wide. This would have a major impact on any in situ archaeological remains.

2.2.10 Construction of structures such as the BESS will normally involve a topsoil strip, regrading/levelling of land, service trenches and foundations, all of which can have a major impact on archaeological remains. Tables 2-5 to 2-16 [APP-038] detail these impacts, including internal services and roads, all of which indicate major construction impact within the footprint of these works. The BESS also includes a drainage lagoon (Table 2-29) [APP-038] which is likely to cause considerable impact on any in situ archaeological remains.

2.2.11 The 400kV cable connection to Eaton Socon substation will be constructed in a maximum 1.5m wide trench with a depth of at least 1m (Table 2-17, [APP-038]). This will have a major impact on archaeological remains within its footprint.

2.2.12 Fencing around solar PV areas will have construction impact localised to foundations for posts – these will be a maximum depth of 1m below ground level (Table 2-23) [APP-038]. Whether that impact is of concern or not depends on the density and significance of any archaeological remains in that area.

2.2.13 Access tracks will involve a topsoil strip of up to 0.25m (Table 2-25). This is shallower than the depth of the archaeological remains in most areas, but removes protection from any such remains, putting them in danger from compression damage from traffic/heavy machinery etc. This is also true of temporary access tracks even though no excavation is proposed (Table 2-26) [APP-038], particularly in wet weather. The temporary access track proposed to cross the scheduled monument in Site C is in an area of very shallow, nationally significant archaeological remains. While the construction technique used is likely to minimise impact, the applicant should provide more information as per the Council's Relevant Representations [RR-150] paragraph 4.2.

2.2.14 Temporary construction compounds will be constructed on matting (Table 2-31, [APP-038]) but could have impact from compression in areas of significant, sensitive or shallow archaeology.

2.2.15 Tree planting, and other works to create Green Infrastructure (2.4.153, [APP-038]), can have a major impact on archaeological remains, depending on the species and density of planting, and whether seedlings/mature trees are being planted.

Mitigations required:

2.2.16 The applicant has proposed a series of mitigation approaches in Chapter 6 of the ES [APP-042]. The Council is broadly in agreement with the Areas of Archaeological Constraint proposed in Sites C and D, with a few exceptions/comments listed below.

2.2.17 The applicant has provided an outline Archaeological Mitigation Strategy (oAMS) [APP-166], and Outline Heritage Enhancement Strategy (oHES) both of which are secured through Requirement 15 and 16 respectably. Furthermore Requirement 15 also states the need for a Written Scheme of Investigation (WSI) for each phase. The Requirements secures full implementation of those strategies, with the below proposed modifications to the Archaeological Mitigation Strategy:

2.2.17 Two cremation burials, most likely related to the Roman town, were uncovered in T803 in the Site C trial trenching. Further remains in T804 and T808 might indicate the presence of at least one burial enclosure in this area. See details in [APP-089]. This is covered by AAC-C-4 (preservation in situ) and AAC-C-5 (archaeological excavation – strip, map and sample). The applicant should provide details in the oAMS of where the projected extent of any burials might be in this area, and if uncertain, address how certainty would be improved. Further intrusive investigation may be needed in this area, post consent, to define the area of burials. A degree of flexibility should then be built into the mitigation strategy for AAC-C-4 in particular, pending the results of any trenching, as concrete blocks may not be appropriate in an area of Roman burial.

2.2.18 Archaeological monitoring is proposed as a potential mitigation measure for cable routes in the oAMS (para 6.2.4). This can only ever follow, and we are likely to find it an inappropriate mitigation method in any but low areas of archaeological potential/complexity, due to the low quality of archaeological investigated often necessitated by working alongside construction works. It should be clear in the oAMS

that archaeological monitoring is a mitigation strategy of last resort, to be used only in exceptional circumstances.

2.2.19 Should there be any possible impact caused by the construction and use of the temporary access road across the scheduled monument in Site C, and programme of mitigation by record may be needed within its footprint. More details and evidence of the measures effectiveness to mitigate the risk of compaction below ground is needed to confirm that this will not be needed.

Operational Phase Impacts

Positive:

2.2.20 Removing the area of the newly designated Roman Town at Great Staughton from arable farming and changing it to open grassland will positively impact the long-term preservation of the asset.

Negative:

2.2.21 Any maintenance work, in particular the replacement at scale of PVs and batteries that are expected to need replacing within the 40 years of the project, installation of new cabling, new or reinstatement of temporary construction compounds or new or reinstated temporary access roads during the operational phase could cause archaeological impact.

Mitigations required:

2.2.22 Recognising the replacement at scale of PV panels and batteries as a phase of development would under requirement 15 [PDA-005] mean the Archaeological Mitigation Strategy is required for approval by the local planning authority in consultation with the county archaeologist before works, or any associated site preparation works (including reinstatement of accesses etc.), commences.

Decommissioning Phase Impacts

Negative:

2.2.23 Potential additional impact caused by removal of infrastructure from development site. As this will occur in 40 years' time, the exact methodology to be used for that removal is uncertain, indeed it is possible that the technology to be employed has not been invented yet.

Mitigations required:

2.2.24 The Archaeological Mitigation Strategy for each phase of works (requirement 15, [PDA-005]) should include the decommissioning phase.

2.3 Biodiversity (ES Chapter 7 Ecology and Nature Conservation)

Summary

2.3.1 The scheme will result in adverse impacts (particularly during the construction phase), including Huntingdon Wood County Wildlife Site / Ancient Woodland, priority habitat (woodland / hedgerow) and protected species (water vole, ground nesting birds, bats, great crested newt and arable flora). However, the level of impact is unknown due to lack of survey effort, detailed information and conflicting documents.

2.3.2 The scheme will result beneficial impacts (operational phase) to biodiversity receptors, including delivery of (non-significant) biodiversity net gain and habitat for a range of protected species, including breeding birds, reptiles and amphibians. However, many of these benefits will be lost during decommissioning when the land is returned to agricultural and it will be important to secure retention of as much habitat of district / county importance or supporting notable species as possible. Although disappointingly, no management is proposed for veteran / ancient trees or in-channel enhancements to watercourse,

2.3.3 Ecological receptors where the Council suggest that the ExA require the applicant to supply further clarification and/or information during the examination:

- Huntingdon Wood County Wildlife site / Ancient Woodland
- Habitats - including woodland, hedgerows and watercourses
- Protected species - water Vole, ground nesting birds, bats, great crested newts
- Notable species - arable flora, invertebrates
- Biodiversity Net Gain

2.3.4 The Council suggests the proposed requirements be expanded to cover targets for Biodiversity Net Gain (subject to release of government guidance in May 2026)

Policy Context

Huntingdonshire Local Plan

2.3.5 Huntingdonshire Local Plan 2019 policy LP-30 Biodiversity and Geodiversity seeks to protect and enhance biodiversity and geodiversity through the planning process, including protection of wildlife sites (statutory and non-statutory); retention, enhancement and creation of habitats and wildlife features; and measures to contribute to biodiversity net gain, reversing species declines and delivering local targets for nature.

Local Nature Recovery Strategy

2.3.6 The Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS) was published by the Cambridgeshire and Peterborough Combined Authority on 23rd December 2025. Its sets out the priorities for nature recovery across

Cambridgeshire and Peterborough, identifying LNRS priority habitats and LNRS priority species and targeted actions. A Local Habitat map has been produced to show the mappable measures for LNRS priority habitats, showing where habitats should be created or existing habitats enhanced. The delivery against these mappable measures as part of development is being incentivised through Biodiversity Net Gain (BNG) by categorising such habitat creation or enhanced of high 'strategic significance' leading to higher BNG scores within the statutory biodiversity metric.

Construction Phase Impacts

2.3.7 All construction impacts have been identified as either neutral or negative.

Negative:

2.3.8 The scheme will, or has the potential to, have adverse impacts during construction on Huntingdon Wood Ancient Woodland / County Wildlife Site, priority habitats (woodland, hedgerows), ground nesting birds, roosting and foraging / commuting bats, great crested newts, water vole and arable flora. However, the level of impact cannot currently be determined due to lack of survey work, information, poor quality assessment and/or conflicting information.

2.3.9 The access track and cabling route (including 2.6m deep junction boxes) will be located in close proximity to Huntingdon Wood Ancient Woodland (irreplaceable habitat) / County Wildlife Site. Insufficient information has been provided to demonstrate how the scheme will not have a hydrological impact on the woodland, particularly given woods in Cambridgeshire are already becoming susceptible to drought / climate change.

2.3.10 The ES Chapter 7 [APP-043], and other documents states that all woodland and trees (priority habitat) will be retained, however this conflicts with the Illustrative Environmental Masterplan [APP-121] and Works Plan [APP-009] which show woodland being removed.

2.3.11 The extent of hedgerow removal is unclear, given that some documents state hedgerows will be retained, while Illustrative Environmental Masterplan [APP-121] shows these hedgerows not being reinstated. It is also unclear if any 'important hedgerow' will be lost or impact of cabling within close proximity to species-rich hedge (Figure 2-1m, [APP-121])

2.3.12 The Breeding Bird Repot [APP-092] is incomplete and the impact to these birds cannot be ascertained until Annex 3 is provided.

2.3.13 A comprehensive assessment of trees for roosting bats has not been completed. Not all trees have received Ground Level Tree Assessment, including those within Huntingdon Wood (zone of influence). At least 18 trees have been identified as having bat roosting potential during survey work, including trees that could support individual or multiple bat including maternity colonies. However, the location of these trees is unclear and no detailed surveys have been completed to confirm presence / absence of roosts. The ES Chapter 7 [APP-141] assessment is based

on inaccurate knowledge of the construction works (construction lighting will be on from 7am-7pm, not 8am-6pm) and assumed mitigation measures are not contained in the Outline Construction Environmental Management Plan (oCEMP) (e.g. lack of sensitive lighting design). Therefore, there is a potential for scheme to have adverse impact on bats. It is recommended roosting bats are scoped in and further detailed bat surveys completed to understand usage of the site by roosting bats. And that roosting bats are scoped into the ecological impact assessment.

2.3.14 Similarly, the assessment for impact to foraging and commuting bats does not accurately reflect the proposed construction works – site lighting will be extended longer (7am-7pm) and the oCEMP does not incorporate the measures set out in ES Chapter 7 [APP-043]. The oCEMP needs to be updated to include a sensitive lighting scheme to minimise adverse impacts.

2.3.16 A comprehensive assessment for Great Crested Newts (GCN) has not been completed, with no surveys of ponds within 250m of site C and D(ponds P40, P41, P42, P43, P44, P46 and P55) – survey work is needed to confirm presence / absence. Further survey work is required to confirm presence / absence of GCN.

2.3.17 ES Chapter 7 [APP-043] does not consider impact of habitat loss / access tracks and vehicle movements / cabling routes within close proximity to these ponds 40, 41 and 43 on GCN. Although, it is identified that works require a European Protected Species Mitigation Licence. To enable the ExA to determine whether the scheme meets the three derogation licensing tests, GCN population surveys must be completed (to ensure proposed mitigation is acceptable). Alternatively, the Applicant may wish to utilise Natural England's GCN District Level Licensing Scheme operating in Cambridgeshire (if its applicability can be demonstrated). We would expect the applicant and Natural England to have agreed the approach and Natural England have issued a Letter of No Impediment (LONI).

2.3.18 A comprehensive assessment for water vole was not completed. Survey work solely focused on watercourse crossing points and did not meet professional standards. Water vole habitat was identified; however, results were inconclusive at confirming water vole presence. The ES Chapter 7 assessment needs to be expanded to consider impact of scheme on ponds or watercourses at risk of pollution during construction (e.g. lighting, vehicle movement), disturbance (works / human activity within 10m), creation of SuDS and works to watercourses (e.g. enhancement to tributary to the River Kym). There will be an adverse impact on water vole, however, detailed survey work is required to determine whether it will be a significant impact. Different survey techniques may be required if dense vegetation continues to be a problem (e.g. change timings, utilise rafts, eDNA or detection dogs).

2.3.19 There is evidence to suggest that solar panels can adversely impact the life cycle of invertebrates that lay eggs in water. However, there has been no assessment of construction impacts to this within ES Chapter 7 [APP-043].

2.3.20 Cambridgeshire is known as a stronghold for arable flora and therefore we are concerned there will be potential adverse impacts to these species / assemblages. This issue has been raised by the council to the applicant as part of our response to

the Preliminary Environmental Impact Report. However, there has been no assessment of construction impacts to notable / rare arable flora. Arable farmland provides ideal locations to notable arable flora, as has been the case for other developments on the clay soils of Huntingdonshire (e.g. A428 Black Cat to Caxton Gibbet). The proposed scheme will result in the creation of large areas of permanent grassland, which will be to the detriment of arable plants that require annual ground disturbance to allow germination and avoid competition. Botanical survey work is required to determine whether arable flora of local, county or national importance will be lost to the scheme.

Mitigations required:

2.3.21 It is not possible to ascertain the level of mitigation required for a number of ecological receptors due to insufficient evidence / survey work to determine the baseline information and potential impact of the scheme, particularly on arable flora, water vole, bats and great crested newts. For example mitigation for arable plants may be required.

2.3.22 The Outline Construction Environment Management Plan needs to be updated to better protect bats and water voles, including details of a sensitive lighting strategy, including dark corridors.

2.3.23 Further detailed assessment is required to demonstrate how adequate compensatory nesting habitat for skylarks and other ground nesting birds will be achieved. If this is not possible, then off-site solution to provide compensatory habitat will be required. This should be secured through a suitable worded section 106.

2.3.24 Mammal access points have been incorporated into the design of the perimeter fence ([APP-122] Figure 2-2n), however, it is unclear the size and spacing / frequency of mammal gate. We seek this figure is updated to include this information.

Operational Phase Impacts

Positive:

Biodiversity Net Gain

2.3.25 The Biodiversity Net Gain report [APP-168] identifies increases in habitat, hedgerow and watercourse units. However, insufficient evidence has been provided to demonstrate how these calculations have been produced and therefore, the following information is required:

a) Habitat surveys of land that was not accessible / omitted due to boundary changes. Assessing habitat types and conditions using aerial photography is not acceptable.

b) Pre-development habitat maps showing primary and secondary UKhab codes, land parcel numbers and all habitat types (including individual trees). We recommend separating out habitat, hedgerow and watercourse units, so that it's easier to read; and to utilise different colour pallet to avoid confusion between woodland and grassland 'greens'

c) Pre-development and post-development habitat maps showing habitat conditions

d) Provide ExA and local authorities GIS layer with habitat data

e) Drawing to show location of irreplaceable habitat

f) Provide habitat condition assessments and watercourse BNG assessments (MoRPh)

g) Statutory Biodiversity Metric accurately record area of 'irreplaceable habitat'

h) Excel spreadsheet for Statutory Biodiversity Metric calculations, including entry for each land parcel / individual tree etc.

i) Statutory Biodiversity Metric calculations take into account Local Nature Recovery Strategy (if possible)

j) Illustrative Environmental Masterplan [APP-121] to include all post-development habitats referenced in the Biodiversity Net Gain Report (e.g. watercourse enhancement)

k) oLEMP [APP-159] cover management for all post-development habitat creation / enhancements set out in the BNG report (e.g. tributary of River Kym omitted)

2.3.26 At the detailed design stage, the Applicant will seek to maximise BNG at the detailed design stage with a commitment to 70% habitat units, 30% hedgerow units and 5% watercourse units (para 5.2.1, Biodiversity Net Gain report [APP-168). However, the Council seeks that the applicant delivers a minimum of 10% BNG across all three units to be considered of significant benefit and would accord with the other NSIP energy scheme approved in Cambridgeshire, Sunnica Energy Farm.

2.3.27 It is considered that the scheme has not maximised opportunities to enhance watercourses flowing through the site (e.g. tributary to the River Kym) or within the riparian zone (River Kym along the northern boundary), such as, in-channel enhancements. The Council seeks the applicant further explore opportunities to deliver 10% watercourse units on-site.

2.3.28 The commitment to deliver at least 10% BNG should also be incorporated into the DCO [PDA-005] requirements - either as a standalone requirement or part of Requirement 4 – Landscape and Ecological Management Plan. As has been the case for other NSIP schemes (e.g. The Sunnica Energy Farm Order 2024 (Requirement 8, Schedule 2). There will also need to be requirements within section 106 agreements with local authorities to secure adequate funding for monitoring of the delivery of the BNG, as well as securing submission of BNG audits throughout the lifetime of the scheme and requirement to complete remedial works (if required).

Other habitats – Tributary to the River Kym

2.3.29 The Biodiversity Net Gain report [APP-168] identifies enhancements to the Tributary to the River Kym (page 30, Appendix A [APP-168]), however, these have not been included within the outline Landscape and Ecological Management Plan [APP-159]. We seek the oLEMP be updated to adequately cover this habitat.

Protected species

2.3.30 The delivery of the landscape scheme, including implementation of a Landscape and Ecological Management Plan will result in beneficial impacts to foraging / commuting bats, amphibians, reptiles, breeding birds (with the exception of ground-nesting birds) and non-breeding birds.

Neutral:

2.3.31 The ES Chapter 7 [APP-043[considered negligible impact to water vole (if present), however this is not considered to be comprehensive. Better consideration needs to be given to both negative impacts, including air / waste pollution from vehicle movements. As well as, positive impacts from enhancement to the tributary of the River Kym and ditch enhancements in Outline Landscape and Ecological Management Plan (oLEMP) [APP-159].

1.1.32 Opportunities to maximise biodiversity value for all habitats present on the site has been missed because they have not all been included in the oLEMP. The Council seeks that both enhancement of in-channel watercourses and management of veteran/ ancient trees and successional planting be included.

Negative:

Birds – Ground Nesting birds

2.3.33 The Applicant considers a minor adverse impact to ground nesting birds during operation as a result of displacement (Chapter 7, Environmental Statement [APP-043]). It also suggests that the impact to skylarks are likely to be negligible at the population level. However, insufficient evidence has been provided to demonstrate there will be no overall loss of nesting habitat. We are concerned the scheme will result in significant adverse impact to ground nesting birds, particularly skylark which is identified of county importance. This is also inadequate consideration of cumulative impact of unmitigated losses of ground nesting bird habitat as a result of other NSIP (solar / road / rail) and other planning applications or projects (ES Chapter 17, [APP053]).

2.3.34 The assessment assumes “that large areas of open grassland will continue to offer suitable nesting habitat within much of the Site”. However, no quantifiable data has been provided to demonstrate how these areas will provide adequate compensatory nesting habitat for nests that will be lost to the solar panel fields. Our understanding is that open grassland and arable fields provide similar densities of nesting sites for skylarks, while areas of set-a-side support higher densities of nesting sites. This would suggest that a simple reversion of arable fields to grassland would not increase the nesting capacity of the habitat. In addition, the grassland areas need to be of sufficient size to be beneficial to skylarks. This rudimental assessment, it would suggest that the Illustrative Environmental Masterplan would not be capable of providing adequate compensatory nesting habitat for skylarks.

2.3.35 Further detailed assessment is required to demonstrate how adequate compensatory nesting habitat for skylarks and other ground nesting birds will be achieved. If this is not possible, then off-site solution to provide compensatory habitat will be required. This should be secured through a suitable worded section 106.

Invertebrates

2.3.36 There has been no assessment of operational impacts to invertebrates within ES Chapter 7 [APP-043] and therefore cannot determine whether or not there will be adverse impacts. There is evidence to suggest that solar panels can adversely impact the life-cycle of invertebrates that lay eggs in water.

Flora

2.3.37 There has been no assessment of operational impacts to notable / rare arable flora. Cambridgeshire is known as a stronghold for arable flora and therefore we are concerned there will be potential adverse impacts to these species / assemblages. This issue has been raised by the council to the applicant as part of our response to the Preliminary Environmental Impact Report, however, no targeted surveys for arable flora have been undertaken. Arable farmland are ideal locations to notable arable flora, as has been the case for other developments on the clay soils of Huntingdonshire (e.g. A428 Black Cat to Caxton Gibbet). The proposed scheme will result in the creation and management of large areas of permanent grassland will be to the detriment of arable plants that require annual ground disturbance to allow germination and avoid competition. Botanical survey work is required to determine whether arable flora of local, county or national importance will be lost to the scheme. We note that pre-commencement surveys for arable flora have been included in the oLEMP (para 5.2.9 [APP-159]), but details have been omitted – we seek these be included.

Mitigations required:

2.3.38 It is not possible to ascertain the level of mitigation required for a number of ecological receptors due to insufficient evidence / survey work to determine the baseline information and potential impact of the scheme during operation, particularly on arable flora, water vole, bats and great crested newts.

2.3.39 We seek greater clarification as to how the solar panels have been designed to avoid adverse impacts to birds and invertebrates that may be attracted to the panels. Mitigation for arable flora may also be required.

2.3.40 Further detailed assessment and mitigation strategy is required to demonstrate how adequate compensatory nesting habitat for skylarks and other ground nesting birds will be achieved. If this is not possible, then off-site solution to provide compensatory habitat will be required. This should be secured through a suitable worded section 106.

2.3.41 The council welcomes the proposed setting up of a steering group to oversee delivery of the LEMP (Section 4.3, oLEMP [APP-159]). Adequate funding will need to be secured, through section 106, to enable local authority officers and wildlife trust to actively attend the steering group. It may also be beneficial to include

research partners, if their work can help influence the landscape management for the better.

Decommissioning Phase Impacts

Negative

2.3.42 We do not agree with the assumption in the ES Chapter 7 [APP-043] that "impacts arising for decommissioning are considered to be commensurate with those experienced during construction and are therefore not assessed in detail" (para 7.8.143). The implementation of the Illustrative Environmental Management Plan and Landscape and Ecological Management Plan will ensure habitat of higher value is secured through the operational phase. Therefore, potentially resulting in much higher losses, than the construction phase.

2.3.43 The creation of habitats that will support a range of species will inevitably attract species to the solar farm development, including protected species. For example, Great Crested Newts will have improved habitat connectivity across a previously sterile landscape; areas managed for arable flora may achieve become of county importance; and delivery of BNG units.

2.3.44 Loss of habitats, and species they support, that have developed during the operational period of the scheme. This could include priority habitats, protected species and species / habitats of local, county or national importance and significant reduction in Biodiversity Net Gain value. It will be important that decommissioning is well designed to avoid adverse impacts.

Mitigations required:

2.3.45 Expand the landscape elements to be retained at the decommissioning phase of oLEMP (para 7.1.2) [APP-159]] / Outline Decommissioning Environmental Management Plan (oDEMP) [APP-158] to secure retention highest quality ecologist features, including - all irreplaceable habitat and priority habitat and habitat of county importance or supporting species and/or assemblages of district or county importance.

2.3.46 Mechanism within the oLEMP [APP-159] / 0DEMP [APP-158] for a steering group to work towards securing long-term habitat retention and management beyond the lifespan of this development.

2.4 Hydrology (ES Chapter 8 Hydrology and Flood Risk)

Summary

2.4.1 The Lead Local Flood Authority (LLFA), Cambridgeshire County Council expects any proposal to have appropriate surface water drainage infrastructure which prioritises the use of Sustainable Drainage Systems (SuDS) and does not increase surface water flood risk.

2.4.2 As the council has a statutory role as Lead Local Flood Authority, sufficient evidence is required to be provided to demonstrate that a suitable drainage solution can be delivered for all sites both during construction and operation.

2.4.3 The Council is not the responsible authority for flood risk resulting from coastal or fluvial flooding, we defer to others who are experts in this area.

Policy Context

Huntingdonshire's Local Plan to 2036

2.4.4 Policy LP5-Flood Risk sets out how new development in Huntingdonshire must address flood risk to ensure that people, property and infrastructure are safe throughout the lifetime of the development.

Cambridgeshire County Council Flood and Water Supplementary Planning Document (adopted by the districts)

2.4.5 The SPD provides guidance on the approach that should be taken to design new developments to manage and mitigate flood risk and include sustainable drainage systems (SuDS). SuDS mimic natural drainage to manage surface water run-off and can also deliver wider benefits such as providing green areas for biodiversity and recreation.

Other Relevant Documents

Surface Water Planning Guidance Document for Developers.[7]

Construction Phase Impacts

Negative:

2.4.6 Increased flood risk, erosion, detriment to water quality - Whilst the proposed sediment control measures such as silt fencing, filter strips, silt matting, settlement ponds, and check dams, are sufficient and supported by the LLFA, the applicant must identify pollution risk areas and demonstrate that these measures address surface water runoff from all relevant construction areas ensuring that surface water treated is prior to discharge.

[7] https://www.cambridgeshire.gov.uk/asset-library/Surface-Water-Planning-Guidance-February-2026.pdf

Mitigations required:

2.4.7 Mitigation measures proposed are sufficient. Further detail, such as a construction/at scale replacement/decommissioning surface water drainage plan is required to demonstrate that the proposed mitigation measures are located strategically and address surface water runoff from all construction areas ensuring the required volumes, rates and level of water quality treatment is provided prior to discharge.

Operational Phase Impacts

Negative:

2.4.8 It has not been fully demonstrated that sufficient mitigation, utilising options thus far identified (which are supported by the LLFA), can be delivered within the Order Limits.

2.4.9 Due to the high-level nature of the submitted information to date, the applicant has not demonstrated that the site can deliver mitigation that is compliant with National and Local Policy, Guidance and Best Practice within the Order Limits.

2.4.10 Lack of consideration for climate change. The report states that the central allowance of 25% has been added for climate change. However, the upper end allowance of 40% should be used.

2.4.11 Pollution of ground and or surface water bodies from fire water. At present the Application does not demonstrate the volumes required for firefighting and immediate and subsequent storm events can be provided onsite. The applicant has not considered how the SuDS infrastructure will be remediated following the disposal of any contaminated fire water. The applicant must consider how surface water will be managed throughout the remediation process.

Mitigations required:

2.4.12 The applicant must provide hydraulic calculations, drainage plans, and proposed discharge rates for each catchment in order to demonstrate that there is no increased flood risk elsewhere in line with the NPPF, and that this can be delivered within the Order Limits.

2.4.13 In accordance with the latest climate change peak rainfall intensity allowances, a climate change allowance should be incorporated into the surface water management scheme. All developments should use the upper end to assess the potential flood risk implications in the design rainfall event including whether there is any increased flood risk to third parties as a result of the development.

2.4.14 Hydraulic calculations are required to demonstrate that the SuDS features have capacity for firefighting and subsequent storm events. The applicant must also consider remediation methods of the proposed SuDS features, including the length of time this may take and the management of surface water in the interim.

Decommissioning Phase Impacts

Negative:

2.4.15 Increased flood risk, erosion, detriment to water quality - Whilst the proposed sediment control measures such as silt fencing, filter strips, silt matting, settlement ponds, and check dams, are sufficient and supported by the LLFA, the applicant must identify pollution risk areas and demonstrate that these measures address surface water runoff from all relevant construction areas ensuring that surface water treated is prior to discharge.

Mitigations required:

2.4.16 Mitigation measures proposed are sufficient. Further details, such as a construction/decommissioning surface water drainage plan is required to demonstrate that the proposed mitigation measures are located strategically and address surface water runoff from all construction areas ensuring the required volumes, rates and level of water quality treatment is provided prior to discharge.

2.5 Traffic and Transport (ES Chapter 9 Traffic and Transport)

Summary

2.5.1 The effects of construction and operational traffic from the proposed facility upon the existing highway network, for which council is the Local Highway Authority (LHA) responsible, need to be assessed and appropriate mitigation and compensation will need to be provided to the LHA.

2.5.2 Chapter 7 of the council's Relevant Representations [RR-150] contained a number of comments relating to Traffic and Transport. The policies these are based on are detailed in the overview in this LIR. Further information on the impacts of the project, and additional mitigation measures are needed, should the proposal be granted consent. These are detailed below.

2.5.3 The council's Highways and Transport teams have provided comment on the ES Chapter 9 [App-045] and its potential impacts, as set out in the following text. From paragraph 2.5.25 onwards, these comments have been split into the different disciplines, to aid comprehension and focus. The teams that have commented and their functions are as follows:

2.5.4 Highway Development Management: The team provide comments on the safety of the proposals and their impact on the existing highway. This includes junction design, visibility splays, and standards that must be met before adoption of a highway.

2.5.5 Transport Assessment: The team review all of the potential transport impacts of proposed developments and consider plans to mitigate any adverse consequences. They consider the access to the site by all modes, focussing on active travel (walking and cycling) and public transport in preference to the use of private cars, and also the reduction of vehicle trips through robust travel planning interventions.

2.5.6 PROW: Issues straddle practical maintenance of the assets, traffic management, user experience and needs, community connectivity, heritage elements, ecology and landscape, public health, and active travel. They sit within a formal legal framework of public rights to access land. Asset Information is responsible for managing the legal processes to change the alignment and status of PROW. PROW are therefore complex and require careful assessment of these interconnected matters.

Policy Context

2.5.7 There are several national and local policies that are relevant to the DCO proposal that the Applicant must consider and address, these include, but are not limited to:

The Local Transport Plan:

2.5.8 The responsibility to produce the Local Transport Plan (LTP) has passed from council to the Cambridgeshire and Peterborough Combined Authority (CPCA). The

CPCA is currently updating the adopted LTP (2020), and this strategy is aligned with the emerging Cambridgeshire and Peterborough Local Transport and Connectivity Plan (LTCP).

2.5.9 The council, as the LHA, continues to produce transport strategy documents, which are aligned with the emerging vision and objectives of the CPCA LTCP to refresh and reflect the council's investment priorities and future aspirations. This strategy work also supports and complements district Local Plans and will review and propose transport improvement schemes for investment for each area.

Gear change: A bold vision for cycling and walking 2020[8]

2.5.10 This is central government's vision for a transformation of the transport system. This policy document sets out the ambition that:

"*England will be a great walking and cycling nation. Places will be truly walkable. A travel revolution in our streets, towns, and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys…*

- Healthier, happier, and greener communities,
- Safer streets,
- Convenient and accessible travel,
- At the heart of transport decision making."

Transport Decarbonisation Plan[9] - Decarbonising transport: a better, greener Britain.

2.5.11 This sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It includes:

- a pathway to net zero transport in the UK
- the wider benefits net zero transport can deliver
- the principles that underpin our approach to delivering net zero transport
- Inclusive Mobility.

Inclusive Mobility[10] -

[8] Gear change: a bold vision for cycling and walking (publishing.service.gov.uk)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf
[9] Transport decarbonisation plan - GOV.UK (www.gov.uk)
https://www.gov.uk/government/publications/transport-decarbonisation-plan
[10] Inclusive mobility: making transport accessible for passengers and pedestrians - GOV.UK (www.gov.uk)
https://www.gov.uk/government/publications/inclusive-mobility-making-transport-accessible-for-passengers-and-pedestrians

2.5.12 A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. This central government plan describes features that need to be considered in the provision of an inclusive environment and issues related to disabling barriers, the use of technology, maintenance, awareness of the needs of disabled people, and engagement.

Local Policy

Cambridgeshire's Active Travel Strategy[11]

2.5.13 This is a topic-specific transport strategy produced by the council that will sit under the Cambridgeshire and Peterborough LTCP. The strategy sets out an ambitious vision that seeks to embrace active travel at the heart of all future transport projects and developments, that will prioritise walking and cycling and other active travel modes to create a well-connected, safe, and inclusive active travel network across Cambridgeshire to ensure it becomes the 'go-to' travel option for many local journeys.

Local Cycling and Walking Infrastructure Plan[12] (LCWIP)

2.5.14 This forms part of the Government's aim to make walking and cycling the natural choice for all short journeys or as part of a longer journey. DfT recommended that all local authorities should develop LCWIPs and have advised that those authorities with plans will be well placed to bid for future funding. The Cambridgeshire LCWIP covers the whole County and focuses on each district to highlight priority routes for cycling using census data to identify where funding could have the greatest effect in terms of where people live and work. For walking it focuses on Cambridge City and the Market Towns to identify the main routes to school, local shops, employment, and train/bus stations. The routes that are identified in the LCWIP are detailed in Cambridgeshire's draft Active Travel Strategy[13] action plan as Tier 1 of the proposed active travel network vision.

The CPCA's sustainable growth ambition[14]

2.5.15 This frames how they seek to achieve sustainable good growth using their 'Six Keys' to improve lives and double the economy of the region, through all their plans. The

[11] Cambridgeshire's Active Travel Strategy - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy
[12] Local Cycling and Walking Infrastructure Plan (LCWIP) - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-local-cycling-and-walking-infrastructure-plan-lcwip
[13] Cambridgeshire's Active Travel Strategy - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy
[14] CPCA's Sustainable Growth Ambition https://cambridgeshirepeterborough-ca.gov.uk/wp-content/uploads/documents/key-documents/Growth-Ambition-Statement.pdf

Six Keys are:

- Climate and Nature
- Health and Skills
- Innovation
- Reducing Inequalities
- Infrastructure
- Finance and Systems

Vision Zero Partnership[15]: Towards 2030 – Making our road safer for all (2020).

2.5.16 The Partnership is working towards a long-term strategic goal of Vision Zero, where there are no deaths and serious injuries on the Partnership's roads. This is an ambitious goal and will need time and effort to be achievable. With this Strategy starting in 2020, the goal is to move towards zero deaths or severe serious injuries in the Partnership area by 2040.

Cambridgeshire County Council Heavy Goods Vehicle (HGV) Policy[16]

2.5.17 sets out the council's approach to managing HGV movements across the county.

Housing Estate Road Construction Specification[17] (2023) (HERCS)

2.5.18 HERCS sets out the standards and specification required for the construction for all highways maintainable at public expense within Cambridgeshire.

General Principles for Development[18]

2.5.19 This sets out the principles for design and implementation for new development related highway infrastructure in Cambridgeshire.

The Design Manual for Roads and Bridges[19] (DMRB)

2.5.20 DMRB suite of documents is applied within Cambridgeshire to major works comprising complex junction design (i.e. traffic signal installations), structures/

[15] Road Safety Partnership - Road Safety Partnership (cprsp.co.uk) https://www.cprsp.co.uk/
[16] Heavy Goods Vehicle (HGV) Policy - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/heavy-or-abnormal-loads-on-the-highway/heavy-goods-vehicle-hgv-policy
[17] Highways development - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/highways-development
[18] Highways development - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/highways-development
[19] Standards For Highways | Design Manual for Roads and Bridges (DMRB) https://www.standardsforhighways.co.uk/dmrb/

culverts design, AIP, Road Safety Audit process etc which are outside the remit of the HERCS document.

The Road Traffic Regulation Act 1984[20]

2.5.21 This relates to the processes and procedures relating to the imposition of a new speed limit on New Bridge Lane.

Cambridgeshire County Council Street Lighting Specification[21] (2016)

2.5.22 Provides the standards required for new street lighting infrastructure to comply with the adoption principles of Cambridgeshire's long term PFI contract for the implementation and maintenance of new adoptable infrastructure.

Cambridgeshire and Peterborough Minerals and Waste Local Plan[22]

2.5.23 Policy 23: Traffic, Highways and Rights of Way also applies. It states that Mineral and waste management development will only be permitted if:

(a) appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, to the degree reasonably available given the type of development and its location. If, at the point of application, commercially available electric Heavy Commercial Vehicles (HCVs) are reasonably available, then development which would increase HCV movements should provide appropriate electric vehicle charging infrastructure for HCVs;

(b) safe and suitable access to the site can be achieved for all users of the subsequent development;

(c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree;

(d) any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residual cumulative impacts on the road network; and

(e) binding agreements covering lorry routing arrangements and/or HCV signage for mineral and waste traffic are agreed, if any such

[20] Legislation.gov.uk https://www.legislation.gov.uk/
[21] Street_lighting_Development_Specification (cambridgeshire.gov.uk) https://www.cambridgeshire.gov.uk/asset-library/imported-assets/Street_lighting_Development_Specification.pdf
[22] Cambridgeshire and Peterborough Minerals and Waste Local Plan https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan

agreements are necessary and reasonable to make a development acceptable.

Cambridgeshire County Council's Highway Asset Management Policy, Strategy and Highway Operational Standards[23]

2.5.24 The standards are relevant to the proposed DCO in the context of traffic and transport issues.

Highway Development Management: Construction Phase Impacts

Neutral:

2.5.25 The proposed Construction accesses within Cambridgeshire has been designed in accordance with the Design Manual for Roads and Bridges (DMRB) in relation to speeds correlating either to the posted speed of the road or from speed surveys undertaken and will be required to be geometrically suitable for two-way vehicles of the largest vehicles likely to be associated with the site.

2.5.26 No permanent signal junctions are proposed as part of the works. The proposed temporary signal junctions will need approval from the street works team in relation to implementation. The proposed accesses are simple in form and do not require a safety audit as there is no change from line and level of the existing road network

Negative:

2.5.27 The LHA considers the negative impact during the construction phase would be that of increased vehicle movements on the network and increased travel times. The Council's Transport Assessment team (See below Paragraphs 2.5.44 – 2.5.53) have indicated that the proposed level of movement associated with construction are not unacceptable on the highway network in capacity terms, noting construction traffic is 30 months.

Mitigations required:

2.5.28 Proposed temporary speed limits and signal control at construction accesses to allow movement from the proposed accesses during the construction period.

2.5.29 A pre and post condition survey should be included for the surrounding road network utilised by construction traffic and made part of the proposals within the outline Construction Traffic Management Plan (oCTMP). The CTMP is secured in requirement 8 [PDA-005], to be substantially in accordance with the oCTMP and approved by the local planning authority in consultation with the relevant highway

[23] Highway policies and capital maintenance programme - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/highway-policies-and-capital-maintenance-programme

authority. Any damage caused by the construction traffic to the highway network will need to be repaired at no expense to the LHA.

2.5.30 The proposed accesses within Cambridgeshire Highway Authority area will need to be constructed in accordance with geometric standards to allow for the largest vehicles likely to enter and exit the site simultaneously in accordance with DMRB requirements relating to vehicle-to-vehicle visibility.

2.5.31 The council will require the works to the highway to be delivered via protective provision to capture that of Section 287/S38 with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991.

2.5.32 The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991 requirements.

Highway Development Management: Operational Phase Impacts

Neutral:

2.3.31 Operational vehicle movements are considered low and in relation to the construction phases and would therefore not be considered an issue.

Negative:

2.5.32 The at scale replacement of PV panels and batteries is considered to produce a level of construction traffic where negative impacts may be felt. The council needs more information as to the projected traffic generation and over what timescales for the replacement of PVs and batteries at scale. It needs to be identified which construction accesses will be reinstated, use of the internal haulage and need for Temporary Traffic Regulation Orders.

Mitigations required:

2.5.33 Recognising the replacement at scale of PV panels and batteries as a phase of development would under requirement 8 would mean a Construction Traffic Management Plan is required for approval by the local planning authority in consultation with the LHA before works, or any associated site preparation works (including reinstatement of accesses etc.) commences.

2.5.34 For any works to reinstate accesses will need to be constructed to a suitable standard in both construction and geometry for the type of vehicles associate with the operation phase. This to be via proposed protective provision with the LHA to capture that of Section 287/S38 with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a

satisfactory manner. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991.

2.5.35 Proposed temporary speed limits and signal control at construction accesses to allow movement from the proposed accesses during the decommissioning period.

2.5.36 A pre and post condition survey should be included for the surrounding road network utilised by construction traffic within any final construction traffic management plan which should be conditioned.

Highway Development Management: Decommissioning Phase Impacts

Neutral:

2.5.38 The proposed decommissioning accesses within Cambridgeshire will be designed in accordance with the D.M.R.B in relation to speeds correlating either to the posted speed of the road or from speed surveys undertaken and will be required to be geometrically suitable for two-way vehicles of the largest vehicles likely to be associated with the site.

Negative:

2.5.39 The LHA considers the negative impact during the decommissioning phase would be that of increased vehicle movements on the network and increased travel times. See Transport Assessment comments below (Paragraphs 2.5.44 – 2.5.53)

Mitigations required:

2.5.40 The Decommissioning Traffic Management Plan (DTMP), part of requirement 18 decommissioning and restoration, [PDA-005]), is drafted for approval by the local planning authority. It is asked the LHA is consulted on the DTMP.

2.5.41 For any works to the highway will need to be constructed to a suitable standard in both construction and geometry for the type of vehicles associate with the decommissioning phase. This to be via proposed protective provision with the LHA to capture that of Section 287/S38 with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991.

2.5.42 Proposed temporary speed limits and signal control at construction accesses to allow movement from the proposed accesses during the decommissioning period. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991 requirements.

2.5.43 A pre and post condition survey should be included for the surrounding road network utilised by construction traffic within any final construction traffic management plan which should be conditioned.

Transport Assessment: Construction Phase Impacts

Neutral:

2.5.44 There are no significant concerns in respect of the volume of traffic during the construction period as the staff movements will be during the AM and PM peak shoulders and not the peak hours.

2.5.45 The staff occupancy is proposed to be 2 persons per car. Whilst we welcome the target, it is challenging. 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.

Negative:

2.5.46 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) which are dealt with in the Transport Assessment Chapter.

2.5.47 It is noted that any vehicles travelling southbound on the A1 to access the B645 would pass northbound along part of the Old Great North Road which is a residential area. Whilst this road may well have sufficient capacity to cater for HGVs there is a significant impact for residents.

Mitigations required:

2.5.48 The outline Construction Traffic Management Plan (oCTMP), [APP-156] need to detail a routing plan for all vehicles, to include HGVs routing from the wider highway network. The oCTMP [APP-156] needs to commit to measures to monitor and enforce the routing plan. This is to include public engagement and communication throughout the construction process.

2.5.49 It is requested that the routing plan should direct HGVs traveling southwards on the A1 to the Wyboston junction and then return northwards to the A645 junction. In doing so this avoids the residential area on the east site of the A1/B645 junction.

Transport Assessment: Operational Phase Impacts

Negative:

2.5.50 The at scale replacement of PV panels and batteries is considered to produce a level of construction traffic where negative impacts may be felt. The council needs more information as to the projected traffic generation and over what timescales for the replacement of PVs and batteries at scale.

Mitigations required:

2.5.51 Please see paragraph 2.5.33 above.

Transport Assessment: Decommissioning Phase Impacts

Negative:

2.5.52 There will be impacts for a period of time associated with increased traffic movements similar to that raise above for construction.

Mitigations required:

2.5.53 The council notes the decommissioning traffic management plan is proposed to be submitted as part of requirement 18 [PDA-005] for approval by Bedford Borough Council and Huntingdonshire District Council. This needs to be in consultation with the LHA.

Public Rights of Way: Construction Phase Impacts

Negative:

2.5.54 It is likely that all PROW in the vicinity of solar arrays and associated infrastructure will be subject to general construction noise.

2.5.55 Users will be negatively affected by construction traffic both where PROW are used as construction routes and at crossover points. Users will be subject to noise, and potentially dust and mud as a result of construction traffic.

2.5.56 Users of PROW 112/7 and 112/8 will be diverted during the construction phase.

2.5.57 The safety measures where construction traffic interact with PROW appear to be limited to placing signage. This may be insufficient to protect PROW users.

2.5.58 Public Footpaths 213/3, 213/28 will have a Moderate to Major Adverse (Significant) impact on the quality and character of the available view during the construction phase.

2.5.59 Public footpaths 213/1, 112/5, 112/6, 112/7 and 112/8 will have a Major Adverse (Significant) impact on the quality and character of the available view during the construction phase.

Mitigations required:

2.5.60 There should be regular condition surveys/inspections throughout the construction of the project to ensure that PROW within the development are safe and usable. If they are becoming unsafe then remedial works must be carried out to resolve. The council requires the Applicant to restore all affected PROW to their pre-construction condition, or to another specified condition agreed between the parties in

accordance with legal requirements. These requirements should be clearly set out in the oCTMP [APP-156] or oPRoWMP [APP-160].

2.5.61 Details of signing and advance noticing in relation to any temporary PROW closures or diversions should be clearly set out in a CTMP or RoWMP and agreed with the LHA.

2.5.62 Road Safety Audits requested for every point where construction traffic intersects with PROW. Measures put in place to slow construction traffic where crossing PROW.

Public Rights of Way: Operational Phase Impacts

Neutral:

2.5.63 There is a DMMO application to record a bridleway which crosses the application boundary. Construction and operation of the development may hinder the opening of any additional user rights that may be determined to exist following the investigation of the DMMO application.

Negative:

2.5.64 Visual amenity impact, LVIA [App-073]. A number viewpoints are recognised to suffer from long-term adverse impacts. While many of these remain Minor, or Minor-Moderate, it remains the case that some sites will still experience a significant adverse impact even after 10 years of operation of the development.

Within Cambridgeshire:

2.5.65 At year 10, Public footpath 213/1 (Viewpoint 51) will have a Moderate to Major Adverse (Significant) impact on the quality and character of the available view. Mitigation planting is acknowledged as being insufficient to offset this negative impact on PROW users.

2.5.66 A Moderate impact is also noted at year 10 for viewpoints 71, 77 and 78. While this is noted as a 'not significant' impact, the document also notes that mitigation planting would result in a view that is "more restricted than the baseline situation". Irrespective of whether the impact is considered significantly adverse or not, it remains the case that the character of the views offered at points 71, 77 and 78 are changed adversely in the long term.

2.5.67 Where PROW are used as access to the site there may be some infrequent traffic potentially impacting on the users of the PROW.

2.5.68 The at scale replacement of PV panels and batteries is considered to produce a level of construction traffic where negative impacts may be felt. The council needs more information as to the impact on PROW and over what timescales.

Mitigations required:

2.5.69 Any additional proposals to screen the development from affected routes would be welcomed. Screening should be positioned such that the countryside views from adjoining PROW are not restricted.

2.5.70 The long-term impact of the development on PROW users should be mitigated through the provision of improved PROW and non-motorised user access options.

- Provision of new permissive routes, or increased status of permissive routes. The Applicant's proposals for providing permissive access routes have not been defined: this needs to be provided and considered before we can understand if it offers appropriate mitigation for the development.
- Facilitating improved PROW and non-motorised user connections between rural communities in the vicinity of the development. This would help to satisfy NPPF para 105 and the Cambridgeshire ROWIP by delivering enhancements to the local PROW network. The following options should be given consideration and the council would welcome engagement:
  - Improved east-west connectivity to enable access from rural communities to St Neots and the National Cycle Network (NCN) at Hail Weston
  - North-South connectivity to Grafham Water.
  - Improvements to pre-existing PROW infrastructure.
  - The council understands that a suite of proposed PROW enhancements has been submitted by Bedford Borough Council and is supportive of these ambitions.

2.5.71 DMMO - Without prejudice, the council requests that a 7-metre-wide corridor is kept available along the line of the DMMO application route through the proposed development, to ensure that access can be easily facilitated in future, should the DMMO be confirmed.

2.5.72 Recognising the replacement at scale of PV panels and batteries as a phase of development would under requirement 11 mean a PROWMP is required for approval by the local planning authority in consultation with the LHA before works, or any associated site preparation works (including reinstatement of accesses etc.) commences.

2.5.73 There should be regular condition surveys/inspections throughout the at scale replacement works to ensure that PROW within the development are safe and usable. If they are becoming unsafe then remedial works must be carried out to resolve

2.5.74 Road Safety Audits requested for every point where construction traffic for the at scale replacement intersects with PROW. Measures put in place to slow construction traffic where crossing PROW.

Public Rights of Way: Decommissioning Phase Impacts

Negative:

2.5.75 It is likely that all PROW in the vicinity of solar arrays and associated infrastructure will be subject to general construction noise.

2.5.76 Users will be negatively affected by construction traffic both where PROW are used as construction routes and at crossover points. Users will be subject to noise, and potentially dust and mud as a result of construction traffic.

2.5.77 The safety measures where construction traffic interacts with PROW appear to be limited to placing signage. This may be insufficient to protect PROW users.

Mitigations required:

2.5.78 There should be regular condition surveys/inspections throughout the decommissioning works to ensure that PROW within the development are safe and usable. If they are becoming unsafe then remedial works must be carried out to resolve

2.5.79 Road Safety Audits requested for every point where construction traffic intersects with PROW. Measures put in place to slow construction traffic where crossing PROW.

2.6 Noise and Vibration (ES Chapter 10)

Summary

2.6.1 Huntingdonshire District Council are the appropriate authority to inform the impact of noise and vibration in detail. However, as it relates specifically to PROW users the following is provided in this LIR.

Operational Phase Impacts

Negative:

2.6.2 As it relates to PROW equestrian users inverter buildings near PROW may transfer sound that unsettles horses.

Mitigations required:

2.6.3 As it relates to PROW equestrian users it is requested that any inverter buildings or other electrical equipment near PROW be constructed to minimise transfer of sound that horses are sensitive to. Operational noise assessment (Requirement 12 of the DCO [PDA-005]) should include an assessment of the noise from inverters or other electrical equipment and the frequencies to which horses are sensitive to. Suitable mitigation measures need to be implemented.

2.7 Land and Soils (ES chapter 13 Land and Soils)

Summary

2.7.1 The Council, in its role as Minerals and Waste Planning Authority has interest in the Safeguarding of Mineral Resources

2.7.1 Planning Statement [APP-031], 7.16.5 and 7.16.6 explains that: "*An assessment of the impact of the Scheme on safeguarded minerals resource is set out within Planning Statement Appendix B – Mineral Safeguarding Report [EN010141/DR/5.3], and ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]. The assessment identifies that the Order Limits lie partially within areas that have been allocated by BBC and CCC as Mineral Safeguarding Areas.*

2.7.2 *As set out within Planning Statement Appendix B [APP-031] – Mineral Safeguarding Report and within Section 13.8 of ES Vol 1 Chapter 13: Land and Soils [APP-150], the Scheme would be temporary in nature and decommissioned after 40 years. Any impacts caused by the Scheme related to land use are considered reversible. The minerals within the Order Limits would not be permanently sterilised, and post decommissioning, the land could be worked for minerals if required. Thus, the Scheme is considered to meet the requirements of NPS EN-1, Policies MSP 11 and 12 of the MWLP: SSP, and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.*" Policy 5 is correctly identified.

2.7.3 The Council, in its role as Minerals and Waste Planning Authority is generally content with the accuracy of the assessment and conclusion reached.

2.7.4 It is noted that in paragraph 2.4.4 of the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-158] it is explained that "*Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be made safe and left in situ to reduce the environmental impact of excavation*". The oDEMP needs to identify sections of underground infrastructure that poses a risk of adverse environmental impacts if extracted to justify being left in situ with a record shared with the Minerals and Waste Planning Authorities. All other sections should be removed.

Policy Context

2.7.5 Cambridgeshire and Peterborough Minerals and Waste Local Plan - Policy 5

Construction Phase Impacts

Neutral:

2.7.6 Cabling is to be placed underground for the duration of the project.

2.7.7 An estimate of the materials likely to be required for construction, for example to establish the internal haulage route is needed to ensure there are no significant impacts.

Mitigations required:

2.7.8 A record of underground infrastructure to be submitted to the Minerals and Waste Planning Authority at the time of construction and after decommissioning.

2.7.9 It would aid the council in its monitoring of the minerals use for the Applicant to provide an estimate of the aggregates likely to be required for this project.

Operational Phase Impacts

Neutral:

2.7.10 The proposed development will result in temporary sterilisation of mineral resource.

Mitigations required:

2.7.11 Scheme to be decommissioned and land restored to uses prior to development at end of life.

Decommissioning Phase Impacts

Negative:

2.7.12 Potential damage through the extraction of underground infrastructure, in particular with regard to archaeology.

Mitigations required:

2.7.13 The Decommissioning Environmental Management Plan 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 of underground infrastructure should be removed. All other sections should be removed. As part of the DEMP below ground infrastructure left in situ needs to be recorded, and plans showing the location of any underground infrastructure are sent to the Minerals and Waste Planning Authorities for its' records.

2.8 Socio-Economics (ES Chapter 14)

Summary

2.8.1 Huntingdonshire District Council will be commenting on socio-economic matters in detail. Cambridgeshire County Council's comments below are in addition as they interact with roles within the council related to communities and education.

Construction Phase Impacts

Positive:

2.8.2 Skills & Employment – opportunity for young people to have an insight to the industry, site visits and engagement activities. Opportunities for the employment of local people and apprenticeships.

Negative:

2.8.3 Potential risk of increased antisocial behaviour and organised crime linked to construction site and high value equipment.

Mitigations required:

2.8.4 On site security to reassure community and act as deterrence. Engagement and liaison with Local Community Safety Partnership. This to inform the proposed fencing and other means of enclosure to be provided under requirement 13 [PDA-005] as part of detailed design, requirement 3 [PDA-005]).

Operational Phase Impacts

Positive:

2.8.5 The Council considers there is the potential for a positive effect on the economy but appropriate provision must be made to deliver employment, skills and education benefits/opportunities locally to realise this. This is to include an educational programme to support science, technology, engineering, and mathematics (STEM) curriculum and careers education with local schools and colleges.

Neutral:

2.8.6 Community benefit fund is outlined in the planning statement [APP-031] paragraph 5.5.3. Funding enables community groups and projects to thrive. However, it is acknowledged this is not to be taken into account within the planning balance and is not considered as part of the planning decision.

2.8.7 Short term jobs and employment linked to at scale replacement of PV panels and batteries.

Mitigations required:

2.8.8 The Outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163] currently lacks specific detail on needs addressed, initiatives and a delivery programme to maximise benefits. This should include consideration towards employment at construction/operation/at scale replacement and decommissioning phases.

Decommissioning Phase Impacts

Neutral:

2.8.9 Short term jobs and employment linked to decommissioning of site.

Negative:

2.8.10 Potential risk of increased antisocial behaviour and organised crime linked to construction site and high valuable equipment.

Mitigations required:

2.8.11 On site security to reassure community and act as deterrence. Engagement and liaison with Local Community Safety Partnership. Secure fencing and enclosure details should be part of the outline Decommissioning Environmental Management Plan (oDEMP) [APP-158]. The DEMP is to be submitted for approval as part of requirement 18 [PDA-005].

2.9 Climate Change (ES Chapter 15)

Policy Context

2.9.1 The UN Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6)[24] confirms that there is "unequivocal" scientific consensus that human-induced climate change is already happening and will continue to increase. Limiting this requires deep reductions in GHG emissions. The Paris Agreement reached by the United Nations (UN) Climate Change Conference in 2015 (COP21), is an international treaty signed by 194 parties[25], which sets the goal to "*substantially reduce global greenhouse gas emissions to limit the global temperature increase in this century to 2 degrees Celsius while pursuing efforts to limit the increase even further to 1.5 degrees*". To keep global warming to no more than 1.5°C, GHG emissions need to be reduced by 45% from 2010 levels by 2030 and reach net zero by 2050.

2.9.2 The Climate Change Act 2008 commits the UK to reducing its GHG emissions to net zero by 2050. Following this, legally binding five-yearly carbon budgets have been established, each of which requires lower total emissions than the previous period.

2.9.3 The council have declared in their updated Climate Change and Environment Strategy (published January 2026) an ambition for the county of Cambridgeshire to reach net zero carbon emissions by 2045.

2.9.4 Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 - Policy 1 Sustainable Development and Climate Change - states that development proposals will be assessed as to whether they move toward sustainable solutions; that they should take a proactive approach to mitigating climate change and sets out criteria against how this could be achieved.

Construction Phase Impacts

Negative:

2.9.7 A range of emissions sources have been identified as part of the construction phase. While the initial surveys indicate peat is unlikely to be found, the risk of this has been identified. The resulting impact on peatland and associated GHG emissions have not been adequately identified, nor is the identified mitigation of halting the scheme "until a suitably qualified ecologist has inspected the Site" as there is no information about what actions would be taken next.

Mitigations required:

2.9.8 Full integration of peatland emissions management should be required as part of Construction Environmental Management Plan, along with recalculation of

[24] WGI Summary for Policymakers Headline Statements | Climate Change 2021: The Physical Science Basis (ipcc.ch) https://www.ipcc.ch/report/ar6/wg1/resources/spm-headline-statements/
[25] 193 States plus the European Union

associated carbon emissions arising from the scheme – alongside recalculation of the schemes overall carbon benefit, given this scheme's rationale being largely grounded in delivery of national decarbonisation and emissions reductions.

2.9.9 While mitigations have been outlined in the ES Chapter 15 'Climate Change' [APP-116], paragraph 15.9.2, these are only described as measures 'identified' and 'could' reduce GHG during the detailed design phase. There remains a lack of certainty that they will be implemented and without monitoring and reporting in place, assurance GHG are further reduced. It should be part of the DCO requirement 3, detailed design [PDA-005] that the applicant submit and updated Greenhouse Gas Emissions Assessment [APP-116] to demonstrate that the identified (and any future identified) mitigations have been implemented to reduce emissions.

Operational Phase Impacts

Positive:

2.9.10 Generation of electricity throughout the project lifecycle. Overall positive impact, reducing net GHG emissions and contributing to net zero polices.

Neutral:

2.9.11 Lifecycle replacements have been incorporated into the project, however these have been limited to warranty and incorporated into the "the typical warranty of the equipment". No consideration has been provided for additional replacements. While this is largely a suitable assumption for the GHG baselining purposes, additional replacements are likely to be required.

Negative:

2.9.12 There are no neutral impacts identified for the construction phase with regard to climate change.

Mitigations required:

2.9.13 It would be beneficial to establish a mechanism to monitor lifecycle replacement of equipment against the assumptions within the baseline. Should replacements be required to a level significantly higher than assumed, this should trigger a new Greenhouse Gas Emissions Assessment [APP-116] to provide assurance that the project remains an overall positive contributor to reducing GHG emissions and net zero polices.

Decommissioning Phase Impacts

Neutral:

2.9.14 The detailed Decommissioning Environmental Management Plan will need to demonstrate maximising the recycling material removed from the site.

Negative:

2.9.15 There are no positive impacts identified for the decommissioning phase with regard to climate change.

Mitigations required:

2.9.16 Requirement 18, decommissioning and restoration, to include a revised Greenhouse Gas Emissions Assessment [APP-116] to complete the lifecycle assessment as proposed in ES Chapter 15 ‘Climate Change’ [APP-116], paragraph 15.9.2.

2.10 Health (ES Chapter 16 Other Environmental Topics)

Policy Context

2.10.1 Section 8 of the NPPF paragraph 96 states Planning policies and decisions should aim to achieve healthy, inclusive and safe places:

> c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP)

2.10.2 Policy 18 of the MWLP requires that: proposals must ensure that the development can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development; and development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including risk of harm to human health or safety. It also requires that: proposals must ensure that the development can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development; and development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including air quality from odour, fumes, dust, smoke or other sources

Health & Wellbeing Integrated Care Strategy

2.10.3 Strategic Priority 2 - Create an environment to give people the opportunities to be as healthy as they can be.

Construction Phase Impacts

Neutral:

2.10.4 The commitment to setting up a Community Liaison Group at the outset of construction is noted in table 16 [APP-052]. This is to maintain open channels of communication between developer and the community and guard against potential health inequalities. The Construction Environmental Management Plan, Construction Traffic Management Plan, Battery Safety Management Plan, and Waste Management Plan are all responsible for detailing the management of impacts from noise, vibration, dust, battery safety and waste management and to navigate potential impacts on human health.

Mitigations required:

2.10.5 All mitigations detailed are essential such as managed work hours, dust suppression etc in identified plans, sustainable construction methods including the considerate constructor's scheme. These together mitigate impact on human health. Appropriate monitoring and enforcement, including finance to support, is required.

Operational Phase Impacts

Neutral:

2.10.6 Currently neutral but there is potential for positive impacts during the lifecycle of the proposals from the 'Agrisolar Research Area' within East Park Site D. This can provide evidence and data to further understand how agriculture and solar development can co-exist on commercial solar installations.

Negative:

2.10.7 There is the potential risk for negative impacts from unplanned atmospheric emissions from the Battery Energy Storage Systems in the result of a fire and also potential leachate.

2.10.8 Mental Wellbeing has potential negatives based on the visual impacts on local amenity and character and access to the countryside. Whilst screening and planting is proposed impact by the proposals will be felt, particularly in the first 10 years.

2.10.9 The Cumulative impacts with other solar developments, namely Little Staughton Airfield Solar Farm, and High Wood Solar, Staploe are in the vicinity of East Park Solar and do form a degree of clustering that impacts the community negatively.

Mitigations required:

2.10.10 The Battery Energy Storage System - all mitigations should be addressed following best practice included in the outlined in the Battery Safety Management [APP-162], (requirement 10 of the DCO [PDA-005]) to be approved by the local planning authority in consultation with Cambridgeshire Fire and Rescue Service.

2.10.11 Improvements to the PROW network (See Traffic and Transport 2.5.70) to improve local amenity and mental wellbeing.

Decommissioning Phase Impacts

Negative:

2.10.12 Short term impacts of dust, noise, vibration, emissions from construction vehicles, machinery and waste materials from the redundant solar farm hardware impacting human health.

Mitigations required:

2.10.13 All mitigations detailed are essential such as managed work hours, dust suppression etc in identified plans, sustainable construction methods including the considerate constructor's scheme. These together mitigate impact on human health. Appropriate monitoring and enforcement, including finance to support, is required.

2.11 Waste (ES Chapter 16 Other Environmental Topics)

Summary

2.11.1 Section 6.3 Waste of the Environmental Statement addresses the topic of waste. The inclusion of estimated waste arisings, and their method of disposal is noted. It is further noted that an outline Waste Management Plan [APP-164] has been submitted. The council has no other comments on this topic at this time.

E N D