

East Park Energy Solar Project

DCO Application 010141

RELEVANT REPRESENTATION SUMMARY BY PHIL WAYLES

Introduction

I am a resident of Little Staughton and have lived in this attractive area for ■ years. Local communities will be significantly affected by the EPE proposed solar farm and battery storage.

I write to express my opposition because of the significant impact on local residents, communities and businesses during construction, operational replacement works and decommissioning. This project results in dramatic and irreversible changes to a large area of countryside.

Best and Most Versatile Land

This solar project results in the significant loss of high-quality farmland - approximately 72% of the site is classified as Best and Most Versatile (BMV). The loss of this highly productive BMV land is totally unacceptable, especially for such a long period of time – essentially two generations – with unknown impact on the quality of the land post decommissioning. This project fails to meet the requirements of NPS EN-3 paragraphs 2.10.20 to 2.10.26. The project also fails to meet the requirement of relevant local authority policies.

The Environmental Statement Chapter 13 states at Section 13.4.10 “... with [Natural England’s TIN 049 estimating that 42% of agricultural land in England is BMV](#)”. This project uses much more better-quality land than the national average, and the cumulative effects of all the other developments in the area only exacerbate this problem. Solar farms should be sited on rooftops or land of lower agricultural quality.

The assessment would appear to not consider permanent impact on buffer zones or planting/landscaping areas nor the fact this land will be affected for at least 40 years – this project will not create temporary impacts.

Assessment of Alternative Sites

The methodology for site identification and appraisal for this project does not properly consider all reasonable alternatives.

The Site Identification Report states the factors used for site selection for the three Zones. This approach fails to consider other relevant crucial factors in this process, including:

- Cultural Heritage
- Landscape and Visual Effects
- Ecology and Nature Conservation
- Hydrology and Flood Risk
- Traffic and Transport
- Legacy

The methodology failed to reasonably and robustly assess lower grade land and brownfield sites in the area. It is important to note that Zone C is shown as a mix of Grade 3 and 4 land and is closer to some of the other Previously Developed Land.

The whole appraisal and decision on using the Eaton Socon substation as the Point of Connection fails to acknowledge Little Barford substation as an option for the Point of Connection. The Little Barford substation is much closer to Zone C. A Point of Connection to the Little Barford substation would remove the perceived significant barrier to grid connection for Zone C and the Grid Connection factor would also be appraised as “Green” rating by applying the methodology used. **Zone C would thus have a “Green” rating in every category and would be the preferred option.**

It is apparent the appraisal process was driven by choosing opportunity sites offered by interested landowners rather than identification and selection by a truly objective, robust appraisal process.

Traffic and Transport impacts

Construction traffic will cause significant impacts on the road network in the area when considering this scheme and other development and infrastructure projects in the area. Many local roads are already in poor condition and are unsuitable to be used by construction traffic – the roads in Cambridgeshire already have weight restrictions.

My concerns include:

- It is usual practice to include preliminary highways design layouts at this stage to give confidence the design is feasible and to adequately assessed for environment impact
- ALL construction traffic should be required to use the internal access road network via the main compound/site access off the B645
- The working day for construction operations must include the “warming up” period for construction plant to avoid unacceptable noise before 0800
- Construction traffic will lead to further deterioration of some local roads
- Lack of consideration of bus stops, especially for on school bus routes
- At Green End, Little Staughton by the introduction of the satellite compound, access SA09, permanent highways improvements, impact on FP4 near the site entrance, bus stops and extra generated traffic during construction and decommissioning.

It is important to note that the locations of the satellite compound locations not disclosed during the consultation process.

There are several key omissions from the oCTMP:

- Need for a Traffic Safety Control Officer
- Construction Traffic Permitted and Restricted Routes Plans
- Proposed diversion routes
- Mitigation measures for walkers, cyclists and horse riders
- Details for traffic management for significant local events

Effects on the environment

The project will have adverse effects on the environment, including visual impact, archaeology/cultural heritage, ecology and local landscape character. Significantly many of these adverse effects will be irreversible.

Archaeology/ Cultural Heritage

The project will have an adverse effect on many cultural heritage assets, including the setting of the prominent Grade I listed All Saints Church at Little Staughton and nearby The Old Manor House, Cretingsbury Earthworks) Scheduled Monument - key landscape vistas should be safeguarded.

Ecology

I am concerned about impacts on protected species throughout the life of the project based on information presented. There will be impacts on habitats/roosts, foraging and commuting routes during construction of the solar panels, crossing points, accesses and hedgerow removal for visibility splays. Mitigation measures will need full agreement with relevant statutory environmental bodies.

Landscape and Visual

The project will have significant adverse impact on the landscape characteristics and views in the area. This includes views from many footpaths around Little Staughton, including visually sensitive locations like Grade I Listed All Saints Church. The proposed planting will have minimal effect to mitigate the visual impact of highly visible solar panels across the valley floor.

All the landscape planting, habitat creation, etc needs to be installed and managed effectively. Evidence from the other solar farms in the area indicated that the screening is unsuccessful without regular aftercare.

Sustainability of equipment / materials sourcing, replacement and decommissioning

I have concerns about the true sustainability and carbon impact of the project through the construction, operation and decommissioning stages particularly for the manufacture, delivery, replacement and disposal of equipment.

Cumulative effects

The cumulative effects of the numerous energy, infrastructure and development projects built or planned in the area are already having an adverse impact on local residents, communities and businesses, and this cannot continue unabated.

The inspector should consider the permanent impact of all these schemes especially the legacy on communities, landscape, etc. and not just construction effects. The Long List of Other Developments considered for the cumulative assessment includes 25 existing and proposed solar and BESS projects in the area. It is concerning that operational schemes were scoped out of the cumulative assessment.

Local residents are likely to be significantly affected by construction and permanent impacts of the many planned developments in the area for decades to come.

Amenity, societal and wellbeing of local residents

The application does not adequately consider the significant impacts on the amenity, societal and wellbeing of local residents for at least two generations. There is strong local feeling about how this solar farm together with many the other existing and proposed energy, infrastructure and housing developments in the area will significantly and adversely affect the rural character, amenity value and open views and wellbeing of local residents.

There remain significant and unacceptable impacts on many properties. There is significant concern locally about the adverse impact this solar farm will have on property prices.

No public rights of ways surveys have been undertaken, so the Applicant has limited appreciation of their usage and benefit local walkers and horse riders.

Decommissioning

I have concerns about the decommissioning process and the legacy left in terms of farming viability, environmental effects, impact on local residents/communities including:

- length of time this complex process will take and associated construction traffic impact
- lack of precedent on the decommissioning process to recreate the rural character from a heavily industrialised environment
- no certainty on who will lead and deliver this work
- reinstatement of land drainage damaged during construction

Community Legacy Fund

I have concerns how the Community Legacy Fund will be secured, guaranteed, managed and distributed. Little Staughton residents had an unacceptable experience with the Little Staughton Airfield solar farm scheme. Promises about the legacy fund for village benefit did not materialise.

Accompanied Site Visit

Visit the following sites to gain a clear understanding of the impact on our communities and concerns about the size and scale of this development:

- Views from the Grade I listed All Saints Parish Church, Cretingsbury Scheduled Monument and nearby footpaths
- Views to the N and NW from the south end on FP10 and 3 to the west of Little Staughton
- Little Staughton airfield solar farm from Moor Road showing failed screening planting
- Cobholden Solar Farm showing damage to the road and verges