

East Park Energy Solar Project

DCO Application 010141

WRITTEN REPRESENTATION SUMMARY BY PHIL WAYLES

Introduction

I am a local resident in Little Staughton and have lived in this attractive area of North Bedfordshire for [REDACTED] years.

I write to express my strong opposition to this project.

Site Assessment of Reasonable Alternatives

The Applicant did not consider all “reasonable alternatives” for the potential sites and Point of Connections during the flawed site selection and assessment process and so this assessment was not in accordance with NPS EN-1 and EN-3.

The Applicant’s methodology comprised “*a qualitative comparison*” of the three Zones using these factors, which resulted in Zone B being the preferred site for the solar farm. [REDACTED] on behalf of the Applicant confirmed at the ISH that the BMV land classifications were determined through a Desk Study in 2022, Reconnaissance survey in 2023 and then discussed with Natural England in 2024. This questions the validity of the sequential test and in particular the validity of the ALC/BMV data used in the site selection process because this work happened before the desk study work according to [REDACTED].

The “*Factors influencing site selection and design*” are set out in EN-3. Section 2.10.10 states the assessment should include “[considerations specific to individual projects.](#)” The Applicant’s approach failed to consider several other relevant crucial factors in the decision-making process, including:

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

The assessment of alternative sites may have resulted in a different outcome if all these factors had been considered.

The whole site selection and assessment process and decision to use the Eaton Socon substation as the Point of Connection fails to acknowledge the presence of the Little Barford substation as a reasonable alternative.

The £35M electricity network upgrade project by UK Power Networks installed a new 132kV underground cable stretching 2.5km between the Little Barford and Eaton Socon substations. This project clearly shows the Applicant’s perceived significant technical barriers for a Grid Connection to the site named Zone C could be overcome.

The Little Barford substation is much closer to Zone C and the ALC at this location is lower grade land than present in the Proposed Scheme. If Little Barford substation had been considered for the Point of Connection, then the Grid Connection factor for Zone C would also be appraised as “Green” rating using the Applicant’s assessment criteria and methodology. **Zone C would thus have a “Green” rating in every category and would be the preferred option.** The appraisal fails to prioritise the use of poorer quality land.

Significantly, the Point of Connection at the Eaton Socon substation appears to be an issue and is not secured. NGET’s Relevant Representation says, “*the substation is currently full and will require expansion, rebuild or provisions of a new substation to facilitate future connections (this includes the Project)*”. This questions the viability of the East Park Energy scheme.

Best and Most Versatile Land

This solar project results in the significant loss of high-quality farmland - approximately 72% of the designated farmland is classified as Best and Most Versatile (BMV) land.

This project therefore fails to meet the requirements of National Policy Statement for Renewable Energy Infrastructure (EN-3) as set out in paragraphs 2.10.20 to 2.10.26.

The Applicant gave oral evidence at the ISH saying the 72% for the chosen sites was less than other areas within the Zone of Influence. This actually reinforces the argument that solar farms should not be constructed in this area because of the higher than the average BMV land. Indeed, the ES Chapter 13 states at Section 13.4.10 “... with Natural England’s TIN 049 estimating that 42% of agricultural land in England is BMV”.

It remains unproven if the soil quality of the site when reinstated will achieve the same BMV land classification following decommissioning of the site.

I am uncertain why the NFU have not been consulted not commented on this important policy matter.

Construction Traffic and Transport Issues

Construction traffic during construction, operational replacement works and decommissioning stage will cause significant impacts on the road network across the whole area, especially when considering the impacts of this scheme and other development and infrastructure projects in the area.

There will be considerable extra local traffic generated at peak times when the construction workers arrive and leave the numerous sites and compounds. National Highways commented in their Relevant Representation about the “*significant volume of trips presented*” at peak times and requested junction impact assessment to be undertaken, including for the A1/B645 junction. At the ISH, [REDACTED] on behalf of the Applicant suggested that PICADY software would be used to model this junction. However, PICADY is not an appropriate tool for modelling the A1/B645 grade separated junction.

The Applicant’s construction traffic flows appear to be understated according to Relevant Representations and several speakers at the ISH, especially in relation to car sharing. National Highways stated in their Relevant Representation at Section 4.3.4 “... *A car share assumption of*

1.4 would result in a significant increase in the number of vehicles accessing the site, predominantly via the A1 junction with the B645". [REDACTED] from National Highways restated this important comment at the ISH..

Also, there are extended peak hours for traffic in this area which causes queues and delays on a daily basis on the major routes as local road users experience and as confirmed in Table 6.3 of the ES Volume 2 Appendix 9-1: Transport Assessment.

In ES Vol 1 Chapter 9 at Section 9.8.8 it states the working hours on weekdays and Saturdays. These timings must include the “warming up” period for construction plant to avoid excessive and unacceptable noise early in morning before 0800

I have significant concerns about the introduction of the satellite compound and access (reference SA09), permanent highways improvements, impact on FP4 where it is coincident with the access track in the vicinity of the Green End site entrance and extra generated traffic at Green End, Little Staughton. It is important to note that the site access points and satellite compound locations were not disclosed during the consultation process.

Many roads are already in a poor condition and unsuitable for HGVs indeed Cambridgeshire County Council has imposed 18T weight restrictions for the whole of their area to the west of the A1 as shown their Cambridgeshire Advisory Freight Map. This could result in more HGVs being routed via local Bedfordshire roads and villages.

Most HGVs will travel through the site on the internal haul roads. A haul road is required to be built along the cable route between Sites B and C rather than use the public highway between access SA12 and SA10/11.

There are many key omissions from the Outline Construction Traffic Management Plan (oCTMP).

- Need for a Traffic Safety Control officer
- As confirmed by [REDACTED] on behalf of Bedford Borough Council at the ISH, detailed permitted routes and restricted routes plans for construction vehicles
- Details and plans of proposed diversion routes
- Consideration of local events that impact on the local road network
- Details of traffic diversion routes during construction
- Measures to prevent damage to the roads and verges in the vicinity of the site accesses and crossing points.

Effects on the environment

The project will have a significant adverse effect on many cultural heritage assets, including the setting of the prominent Grade I listed All Saints Church at Little Staughton and nearby Cretingsbury Scheduled Monument. These are not temporary effects as stated in the ES.

The project will also have an adverse impact on the landscape character, views and key receptors in the area. This includes views from All Saints church, Cretingsbury Scheduled Monument and the nearby well used footpaths.

Proposed planting and screening will have minimal effect to mitigate the visual impact of highly visible solar panels, because of the elevated views from the ridgelines to the north and south of the project

I am concerned about the impacts on protected species throughout the life of the project. This includes the impact on habitats/roosts, foraging and commuting routes for all protected species due to the construction of the solar panels, crossing points, accesses and visibility splays. Lengths of many hedgerows will need to be removed or trimmed back to provide the necessary visibility splays at access and crossing points. This concern was shared by [REDACTED] [REDACTED] on behalf of Bedford Borough Council at the ISH.

Many of these environmental adverse effects are permanent, not temporary, and will be irreversible.

Cumulative Effects

I am concerned the cumulative impacts on the local residents, communities and business are understated in the ES assessment.

The cumulative effects of the numerous energy, major infrastructure and housing and employment 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.

It is illogical to exclude the Little Staughton Airfield Solar, Manor Farm Solar Park, High Wood Solar and Bassmead Manor & Home Wood solar farms from the cumulative assessment.

East Park Energy Solar Project

DCO Application 010141

WRITTEN REPRESENTATION BY PHIL WAYLES

Introduction

I am a local resident in Little Staughton and have lived in this attractive area of North Bedfordshire for [REDACTED] years. We moved here to live in the countryside and reap the benefits of rural village life. Our family enjoys regular walks, runs and cycle rides in and around the village, taking in the views across the rolling countryside. Like many others we enjoy using the extensive public rights of way and quiet road network. I firmly believe myself, my family and other residents of Little Staughton and the surrounding villages would be significantly affected by the East Park Energy proposals as a result of the dramatic and irreversible changes to the whole area brought about by this solar project.

I write to express my strong opposition to this project.

Site Assessment of Reasonable Alternatives

The Applicant did not consider all “reasonable alternatives” for the potential sites and Point of Connections during the flawed site selection and assessment process and so this assessment was not in accordance with NPS EN-1 and EN-3.

The Applicant gave oral evidence at the Issue Specific Hearing (ISH) and stated the Site Identification Report confirms the only ‘*Factors Influencing Site Selection*’ during the Site Identification stage were required to be:

- Irradiance and site topography
- Proximity of a site to dwellings
- Capacity of a site
- Grid connection
- Agriculture land classification and land type
- Accessibility

The Applicant’s methodology comprised “*a qualitative comparison*” of the three locations or Zones using these factors, which resulted in Zone B being the preferred site for the solar farm. [REDACTED] on behalf of the Applicant confirmed at the ISH that the BMV land classifications were determined through a Desk Study in 2022 and Reconnaissance survey in 2023 and then discussed with Natural England in 2024. This questions the validity of the sequential test and in particular the validity of the ALC/BMV data used in the site selection process because this work happened before the desk study work according to [REDACTED]. The Site Identification Report is dated January 2022, and the assessment work must have been before the desk study was undertaken.

The “*Factors influencing site selection and design*” are set out in EN-3. The first section 2.10.10 states “The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual

projects.” The Applicant’s interpretation of the factors influencing site selection and assessment (as set out in the Site Identification Report and confirmed at the ISH) failed to include pertinent considerations specific to (this) individual project. The Applicant’s approach failed to consider several other relevant crucial factors in the decision-making process, including:

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

The assessment of alternative sites may have resulted in a different outcome if all these factors had been considered based on details contained in the Environmental Statement (ES)

The whole site selection and assessment process and decision to use the Eaton Socon substation as the Point of Connection fails to acknowledge the presence of the Little Barford substation as a reasonable alternative. The ES Volume 2 Appendix 3-6: Grid Connection Corridor Appraisal confirms at Section 2.1.2 that a search area around the Eaton Socon substation was taken as the only starting point for identification of suitable sites.

The recent £35M electricity network upgrade project by UK Power Networks installed a new 132kV underground cable stretching 2.5km between the Little Barford and Eaton Socon substations. This project which was completed in 2024 and clearly shows the Applicant’s perceived significant technical barriers for a Grid Connection to the site named Zone C could be overcome. Also, Figure 6 of the Site Identification Report confirms the cable length from the Eaton Socon substation is about 1.7 times the distance to Zone B (and hence more costly) than a route to Zone C.

The Little Barford substation is much closer to Zone C and the ALC at this location is lower grade land than present in the Proposed Scheme. If Little Barford substation had been considered for the Point of Connection, then the Grid Connection factor for Zone C would also be appraised as “Green” rating using the Applicant’s assessment criteria and methodology. **Zone C would thus have a “Green” rating in every category and would be the preferred option. The appraisal fails to prioritise the use of poorer quality land.**

Significantly, the Point of Connection at the Eaton Socon substation appears to be an issue and is not secured. NGET’s Relevant Representation says “*the substation is currently full and will require expansion, rebuild or provisions of a new substation to facilitate future connections (this includes the Project)*”. The Grid Connection Statement says “...NGET is unable to confirm where point of connection will be at the time of DCO submission”. This questions the viability of the East Park Energy scheme.

Best and Most Versatile Land

This solar project results in the significant loss of high-quality farmland - approximately 72% of the designated farmland is classified as Best and Most Versatile (BMV) land would be taken out

of food production as stated in ES Chapter 13 Land and Soils at Section 13.6. BMV land is most valuable for food security and is essential for producing food for the nation.

This project therefore fails to meet the requirements of National Policy Statement for Renewable Energy Infrastructure (EN-3) as set out in paragraphs 2.10.20 to 2.10.26. Paragraph 2.10.21 of the NPS EN-3 states “While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible. ‘Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)”.

The Applicant gave oral evidence at the ISH saying the 72% for the chosen sites (called Zone B in the Site Identification Report) was less than other areas within the Zone of Influence. This actually reinforces the argument that solar farms should not be constructed in this area of Bedfordshire and Cambridgeshire because of the higher than the average BMV land. Indeed, the Environmental Statement (ES) Chapter 13: Land and Soils states at Section 13.4.10 “Land which is classified as Grades 1, 2 and 3a is defined as BMV agricultural land, with Natural England’s TIN 049 estimating that 42% of agricultural land in England is BMV”. Thus, there are more appropriate locations near other substations across the country that which would not require such large areas of BMV land. The significant adverse cumulative effects for loss of BMV land in the area as a result of other existing and planned developments in the area only exacerbate this problem.

It remains unproven if the soil quality of the site will be reinstated to achieve the same BMV land classification following decommissioning of the site in over 40 years’ time. I am uncertain why the National Farmers’ Union (NFU) have not been consulted not commented on this important policy matter.

Construction Traffic and Transport Issues

Construction traffic during construction, operational replacement works and decommissioning stage will cause significant impacts on the road network across the whole area, especially when considering the impacts of this scheme and other development and infrastructure projects in the area.

There will be considerable extra local traffic generated at peak times when the construction workers arrive and leave the numerous sites and compounds. National Highways commented in their Relevant Representation about the “significant volume of trips presented” at peak times and requested junction impact assessment to be undertaken, including for the A1/B645 junction. At the ISH, [REDACTED] on behalf of the Applicant suggested that PICADY software would be used to model this junction. However, PICADY is not an appropriate tool for modelling the A1/B645 grade separated junction. PICADY is only used for modelling isolated 3 and 4 arm at-grade junctions, such as crossroads and T-junctions. An appropriate traffic modelling tool needs to be used for this grade separated junction.

The Applicant’s construction traffic flows appear to be understated according to Relevant Representations and several speakers at the ISH, especially in relation to car sharing. National

Highways stated in their Relevant Representation at Section 4.3.4 “...the Applicant is assuming a car/van occupancy of 2. It is noted that this is a high car share assumption and that a figure of 1.4 has been commonly used as the basis for travel planning on several recent consented and live DCOs for energy projects in rural locations. A car share assumption of 1.4 would result in a significant increase in the number of vehicles accessing the site, predominantly via the A1 junction with the B645”. [REDACTED] from National Highways restated this important comment at the ISH. I am also concerned about the associated significant increase in the number of vehicles transporting workers to and from the site each day including Saturdays – causing greater noise and disruption.

Also, there are extended peak hours for traffic in this area which causes queues and delays on a daily basis on the major routes as local road users experience and as confirmed in Table 6.3 of the ES Volume 2 Appendix 9-1: Transport Assessment.

In ES Vol 1 Chapter 9 Traffic and Transport at Section 9.8.8 it states “Construction operations would be limited to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00 on Saturday, with no construction work on Sundays or Bank Holidays”. These timings must include the “warming up” period for construction plant to avoid excessive and unacceptable noise early in morning before 0800, for example relating the satellite compound at Green End in Little Staughton

I have significant concerns about the introduction of the satellite compound and access (reference SA09), permanent highways improvements, impact on FP4 where it is coincident with the access track in the vicinity of the Green End site entrance and extra generated traffic at Green End, Little Staughton. It is important to note that the site access points and satellite compound locations were not disclosed during the consultation process.

Many roads are already in a poor condition and unsuitable for HGVs indeed Cambridgeshire County Council has imposed 18T weight restrictions for the whole of their area to the west of the A1 as shown their Cambridgeshire Advisory Freight Map. This could result in more HGVs being routed via local Bedfordshire roads and through villages like Keysoe, Pertenhall and Little Staughton. I am concerned about impact on local roads that are already in poor condition and are unsuitable to be used by construction traffic. Road maintenance repair work in this area is undertaken every year by the local authorities. It is important that road condition surveys are undertaken before, during and after the construction, operational replacement and decommissioning works. Requirements for these condition surveys must be agreed with the local highway authorities and secured as a condition in the DCO.

Most HGVs will travel through the site on the internal haul roads. At the ISH, the Applicant confirmed the public highway (Great Staughton Road and widened Spring Hill Road) will be used for construction vehicles including HGVs, between access SA12 and SA10/11. This seems illogical and inappropriate when a perfectly sensible alternative exists which requires an internal haul road to be built along the cable route between Sites B and C (SA11 and SA12). This would keep site vehicles off the public highway,

There are many key omissions from the Outline Construction Traffic Management Plan (oCTMP).

- A Traffic Safety Control Officer (TSCO) has a key role on such large projects, and they should be included in the list of the Site Team at Section 3.1.1. The TSCO will also be required during the replacement works and decommissioning phase.
- As confirmed by [REDACTED] on behalf of Bedford Borough Council at the ISH, detailed permitted routes and restricted routes plans for construction vehicles should be

produced and agreed with the local highways authorities. This is standard requirement for NSIP schemes. The permitted and restricted routes requirements must be enforced and align with the Design Approach Document which thankfully identifies constraints at Section 4.2.55 "Access to the Site avoiding narrow routes through villages of Great Staughton, Little Staughton, Keysoe, Pertenhall and Swineshead." Construction of the internal tracks must be suitable for HGV movements.

- Details and plans of proposed diversion routes should be provided. Local residents are already disrupted and inconvenienced by regular closures on existing roads like the ongoing Anglian Water works on the B660 and Spring Hill in Little Staughton and frequent road resurfacing / repair works.
- Consideration of local events that impact on the local road network including harvest time (considerable numbers of large agricultural vehicles), Bolnhurst Country Fair, the "Statty" Fair in Kimbolton. St Neots triathlon routes and roads used frequently by local cycling clubs.
- Details of traffic diversion routes during construction (including to build the accesses and widen roads), to coordinate with other parties who need to arrange closures, e.g. the local authorities and Anglian Water and for when incidents occur.
- Measures to prevent damage to the roads and verges in the vicinity of the site accesses and crossing points. Such damage is evident in the vicinity of the Cobholden Solar Farm site access on Bushmead Road.

Effects on the environment

The project will have a significant adverse effect on many cultural heritage assets, including the setting of the prominent Grade I listed All Saints Church at Little Staughton and the nearby Old Manor House, Cretingsbury Scheduled Monument. These are not temporary effects as stated in the ES.

The project will also have an adverse impact on the landscape character, views and key receptors in the area. This includes views from All Saints church, Cretingsbury Scheduled Monument and the nearby well used footpaths.

Proposed planting and screening will have minimal effect to mitigate the visual impact of highly visible solar panels, because of the elevated views from the ridgelines to the north and south of the project and as evidenced by the failure of planting and screening of existing solar farms in the area, for example at Little Staughton airfield when viewed from Moor Road and neighbouring properties..

I am concerned about the impacts on protected species throughout the life of the project, especially the range of notable ground nesting birds, wintering and migratory birds, rare bat species, water voles, amphibians and otters based on information presented in the ES Chapter 7 Ecology and Nature Conservation. This includes the impact on habitats/roosts, foraging and commuting routes for all protected species due to the construction of the solar panels, crossing points, accesses and visibility splays. Lengths of many hedgerows will need to be removed or trimmed back to provide the necessary visibility splays at access and crossing points. This concern was shared by [REDACTED] on behalf of Bedford Borough Council at the ISH.

All mitigation measures will need full agreement with relevant statutory environmental bodies. Of particular concern is the potential significant adverse effects on the foraging and commuting

routes for barbastelle bats from Eversden and Wimpole Woods SAC. This was highlighted as an important issue for the nearby A428 Black Cat to Caxton Gibbet scheme during the DCO Examination. This matter needs to be fully evaluated and assessed in conjunction with Natural England.

Many of these environmental adverse effects are permanent, not temporary, and will be irreversible.

Cumulative Effects

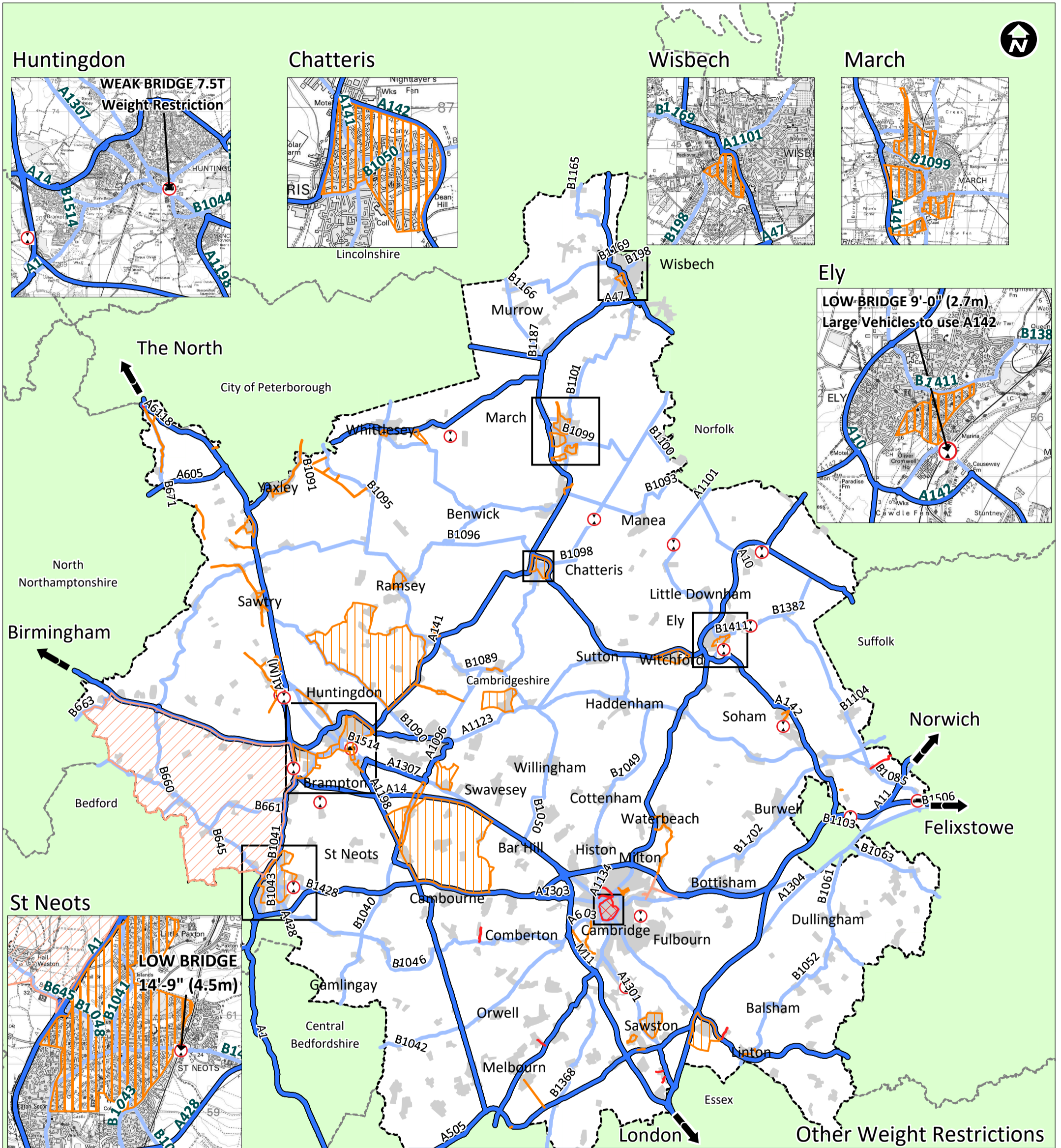
I am concerned the cumulative impacts on the local residents, communities and business are understated in the ES assessment.

The cumulative effects of the numerous energy, major infrastructure and housing and employment 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 projects include many solar farms and other major projects including East West Rail (which may be under construction at the same time) and proposed Tempsford New Town.

It is illogical to exclude the Little Staughton Airfield Solar, Manor Farm Solar Park, High Wood Solar and Bassmead Manor & Home Wood solar farms from the cumulative assessment on the basis that these schemes are operational and are already accounted for within the EIA baseline.

In my view, this represents a serious flaw in the assessment of the cumulative impacts.

Cambridgeshire Advisory Freight Map



HGV Route Type

- Preferred Routes
- Secondary Routes

Weight Restriction Areas

- 7.5T
- 18T
- Other Weight Restrictions (see table to right)

Height Restrictions

Weight Limit	Location	Town / Locality
2T	Wansford Bridge [Bridge End]	Sibson & Wansford
3T	Badlingham Road Bridge [New Street & Badlingham Road]	Chippenham
3T	Mill Road Bridge	Alconbury
3T	Station Road Bridge (B1085)	Kennett
3T	Cambridge City Centre	Cambridge
7.5T	B1040 through Hilton (Jct A1307 to Jct A1198)	Hilton
7.5T Overnight	Gilbert Road Overnight Only (22:00-07:00)	Cambridge
7.5T	High Street (Church Street to Green End Road), Church Street (Chapel Street to St Andrews Road) Chapel Street, Union Lane, Scotland Road	Chesterton
7.5T Overnight	Victoria Road Overnight only (22:00-07:00)	Cambridge
8T	Shepreth Mill Bridge [Fowlmere Road]	Shepreth
11T	Main Street	Caldecote & Kington
12T	High Street	Hildersham
18T	Horningsea Road; Ditton Lane; High Ditch Road	Fen Ditton
20T	Ickleton Road & Hinxton Road	Duxford