EAST PARK ENERGY

East Park Energy

EN010141

Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) and Action Points

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1.0 INTRODUCTION

1.1 Introduction

1.1.1 This note summarises the submissions made by BSSL Cambsbed 1 Limited (the "Applicant") for the East Park Energy project (the "Scheme") at Issue Specific Hearing 2 (ISH2) on 18th March 2026.

1.1.2 This document does not purport to summarise the oral submissions of parties other than the Applicants; summaries of submissions made by other parties are only included where necessary in order to give context to the Applicants' submissions.

1.1.3 The Applicant has supplemented the written summary below with additional information where relevant to the action points raised in ISH2.

1.2 Issue Specific Hearing 2

ISH2 took place on the afternoon of 18th March 2026 and followed the **Agenda for Issue Specific Hearing 2 [EV3-001]** which was published by the ExA in advance of the hearing:

Agenda for Issue Specific Hearing 2	
1	**Welcome and Introductions**
2	**Purpose of the Issue Specific Hearing**
3	**The Use of Best and Most Versatile Land**
4	**The Effects on Food Production and Soil Quality**
5	**Construction traffic routes**
6	**Traffic Management**
7	**Cumulative Impacts from other projects**

Agenda for Issue Specific Hearing 2	
8	**Next Steps**
9	**Closing**

1.2.1 The Applicant did not provide any material comments on Agenda Items 1, 2, 8, and 9 of the Agenda for ISH2.

1.3 Note about National Policy Statements

1.3.1 Section 1.6 of the 2026 National Policy Statement (NPS) EN-1 confirms that for schemes accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect. East Park Energy was accepted for examination in October 2025 prior to the final publication of the 2025 amendments. The 2024 NPSs therefore have effect for decision making.

1.3.2 All references to the NPSs in this document are to the 2024 NPSs unless stated otherwise.

1.3.3 The Applicant has prepared a separate **Note on updated National Policy Statements EN-1, EN-3 and EN-5 [PDA-018]**.

2.0 THE APPLICANTS' SUMMARY OF ORAL SUBMISSIONS MADE AT ISH2

2.1 Agenda Item 3 – The Use of Best and Most Versatile Land

The Applicant's approach to the use of BMV and the identification of alternative lower grade land for siting of the proposed development

2.1.1 The Applicant set out that the approach to mitigating impacts on agricultural land goes back to the initial site selection exercise undertaken in late 2021 which is reported in the **Site Identification Report** (**Appendix 3-1 of the ES [APP-058]**).

2.1.2 For solar, the technology specific site selection policy in EN-3 states that land type should not be the predominant factor in site selection, but applicants should, where possible, use brownfield or previously developed land. Where agricultural land is necessary, poorer quality land should be preferred, and best and most versatile land should be avoided, where possible.

2.1.3 The Applicant's approach as reported in the Site Identification Report followed such a sequential approach. It first defined a 15km Area of Search based on the need to be close enough to the Eaton Socon point of connection to keep the grid connection technically and commercially viable.

2.1.4 Then, in accordance with EN-3's preference for non-agricultural and previously developed land, the Applicant reviewed brownfield land registers and potential previously developed land not included within brownfield land registered within that search area. It was concluded that no brownfield or previously developed land parcels met the minimum land requirement for a 400 MW scheme, either alone or in practicable clusters, meaning agricultural land was necessary to deliver the project.

2.1.5 Having established that agricultural land was necessary, the Applicant then applied the next step in the mitigation hierarchy by targeting areas more likely to be of lower agricultural quality, reviewing Natural England's provisional

Agricultural Land Classification to try to avoid land of a higher environmental value, i.e. to avoid best and most versatile land.

2.1.6 With reference to Figure 6 of the **Site Identification Report [APP-058]**. Three broad search zones were identified A, B and C, targeted primarily towards areas likely to be of lower agricultural quality once spatial planning constraints were excluded. The figure demonstrates clearly the extent of provisional Grade 2 agricultural land within the 15km Area of Search reflecting the high agricultural land quality in the broader area.

2.1.7 The Applicant then balanced agricultural considerations against other EN-3 site selection factors, including the grid connection, topography, proximity to dwellings, and accessibility, and recommended taking forward Search Zone B, primarily because it offered the most straightforward grid connection. It is relevant that NPS EN-3 para 2.10.24 footnote 84 refers to the route and type of terrain with cable having an important impact on project's viability. This balancing exercise is set out in detail in Sections 6 and 7 of the Site Identification Report.

2.1.8 Following identification of a broad search zone, a second stage of site selection was undertaken, which is reported in the **Land Identification Report** (**Appendix 3-2 of the ES [APP-059]**). This comprised a review of the land within the Search Zone where landowners expressed an interest in the Scheme, in order to establish constraints to development and refine the overall landholding to be taken forward.

2.1.9 The culmination of this work was the identification of the Site, where a sequential approach in relation to agricultural land has been followed to try and steer the development towards an area more likely to be of lesser agricultural value, recognising the constraint of the high general agricultural land quality in the wider area around this particular substation.

2.1.10 The Applicant then set out that early indication from a desk study in 2022 and the reconnaissance survey in July 2023 was that most (c75%) of the site was best and most versatile (BMV) land in Grades 2 and 3a, broadly comparable

to the provision agricultural land classification published by Natural England. The findings of the reconnaissance survey were shared and discussed with Natural England in February 2024, following which additional surveys were undertaken to increase the sampling density at the request of NE.

2.1.11 Table 13.8 of **ES Vol 1 Chapter 13 [APP-049]** confirms that 66.4% of the Site is known to be BMV land, with a further 5.4% as yet ungraded (but assumed to be grade 2 BMV for the purposes of assessment). The assessment is therefore based on 555.1 hectares or 71.8% of the total Order limits being BMV land, mostly in Subgrade 3a (349.5 hectares). This was also the conclusion of the July 2023 reconnaissance survey, although the more detailed survey has shown a slightly lower proportion of BMV land.

2.1.12 Table 13.9 of **ES Vol 1 Chapter 13 [APP-049]** sets out the distribution of grades in Bedford Borough and Huntingdonshire District, based on the Provisional ALC data, and Table 13.10 compares the proportions of each grade at the site against the wider Borough and District area. It shows that the site would use no Grade 1 land (which is 10% less than the wider area) and 15% proportionally less Grade 2 land. Conversely, the site would use 31% proportionally more Grade 3 land. Table 13.10 therefore shows that the site is located in an area that is of comparatively lower agricultural quality than found in the wider Borough and District area.

2.1.13 The Applicant set out that it is important to distinguish between the overall 'Order limits' and the land that would be taken up by the solar farm itself. The Order limits comprise the land required for the construction, operation and maintenance of the Scheme (including land required for both permanent and temporary purposes), which extend to approximately 773 hectares. The Order limits include land for the solar farm in addition to (but not limited to) land for access, cabling corridors, green infrastructure and habitat creation, temporary construction requirements and the grid connection corridor.

2.1.14 As set out at paragraph 5.6.4 of the **Design Approach Document [APP-034]**, the extent of land for the solar energy generating station (Work No. 1)

on the Works Plan covers approximately 446 hectares. Paragraph 5.6.4 **[APP-034]** goes on to state that with reference to paragraph 2.10.17 of NPS EN-3 (paragraph 2.10.9 of the 2026 NPS EN-3), a typical solar farm requires between 2 to 4 acres per MW of output (updated to 4-5.6 acres per MW in the 2026 NPS EN-3) and that the Scheme's land use equates to approximately 2.75 acres per MW for a 400 MW output, which is consistent with the guidelines in NPS EN-3 and is therefore considered to be an efficient use of the land resource available.

2.1.15 The Applicant then presented the findings from the agricultural surveys and assessment.

2.1.16 Section 13.10 of **ES Vol 1 Chapter 13 Land and Soils [APP-046]** presents residual effects by receptor (as a summary in Table 13.15). The component-level breakdowns for each work type against each ALC grading are addressed in Tables 13.13 and 13.14 and the accompanying narrative at paragraphs 13.8.6 to 13.8.11.

2.1.17 Table 13.13 shows that there are 694.8 hectares [that are temporarily impacted] within Sites A-D, of which 496.6 hectares or 71.5% is BMV (which increases to 519.2 hectares or 74.7% if the ungraded land is assumed to be all Grade 2).

2.1.18 Table 13.14 breaks down the permanent adverse impacts by Scheme component (Work Nos. 1, 2, 3, 4 and 6) and by ALC grade, including Grade 2 and ungraded land.

2.1.19 Table 13.14 shows that there are 13.49 hectares of permanent land loss, of which 11.62 hectares is agricultural land and 1.87 hectares is non-agricultural. Assuming the ungraded land is Grade 2, 43.4% (or 5.86 hectares) of permanent land loss is BMV (which is substantially below the overall distribution of grades within the site and shows that BMV has therefore been avoided where possible in siting the permanent elements).

2.1.20 Most (7.63 hectares or 56.6%) of the area of permanent adverse impacts is non-BMV land, either in Subgrade 3b or non-agricultural.

2.1.21 Most (73%) of the permanent land take (and 80% of the permanent BMV land take) is in Work No. 6 and particularly in the permanent access tracks where, as a linear feature, it is difficult to avoid intervening areas of BMV land without taking a circuitous route.

2.1.22 Paragraph 13.8.8 explains that the total permanent adverse impact to Grade 2 and ungraded (assumed Grade 2) land is 1.54 hectares, which is assessed as a significant effect (a low magnitude impact on a very high sensitivity receptor, resulting in a Moderate Adverse effect).

2.1.23 Table 13.14 identifies the total area of Subgrade 3a land subject to permanent adverse impact as 4.32 hectares, and paragraph 13.8.9 confirms that this is assessed as not significant (a low magnitude impact on a high sensitivity receptor and a Minor Adverse effect).

2.1.24 The land proposed for green infrastructure (Work No. 8) including new grasslands and planting areas would be removed from agricultural use but there would be no discernible loss or reduction of soil functions that would restrict future agricultural use. There are many Government and other agri-environment schemes that support farmers in the creation of woodland and other habitats, and these changes are reversible and the land could be returned to agricultural use. They are not therefore considered as a permanent loss of land to agriculture.

2.1.25 The agricultural land classification survey approach, including the sampling density, is set out in **ES Vol 1 Chapter 13 Land and Soils [APP-049]**, supported by **ES Vol 2 Appendix 13-1 Agricultural Land Classification and Soil Resources [APP-115]**.

2.1.26 ES Chapter 13 explains at paragraph 13.4.6 **[APP-049]** that sampling was undertaken at a density of one survey point per two hectares across most of the Site and at one survey point per hectare in areas of potentially greater

impact, including the BESS, on-site substation, construction compounds and cable corridors. As set out in paragraph 13.3.5 [APP-049], following statutory consultation, the Applicant undertook further consultation with Natural England on the scope of the ALC survey, and explains the rationale for adopting a proportionate approach to survey density at paragraphs 13.5.1 to 13.5.2 **[APP-049]**.

2.1.27 The approach taken in classifying 'ungraded' agricultural land (as Grade 2) enables an assessment of the worst-case project effects.

Question from ExA noting that Natural England's written representation [AS-023] suggests that survey intensity should be increased

2.1.28 The Applicant set out that its position is that the approach taken to date is appropriate for planning and environmental impact assessment ("EIA") purposes. The results found so far from a reconnaissance survey at 1:4 hectares show that 75% of the site is BMV mostly of Grade 3a. A more detailed survey at 1:2 hectares produced the same results but slightly less BMV, which demonstrates that the approach the Applicant has taken is suitable for planning and EIA purposes.

2.1.29 The Applicant has considered Natural England's advice and the current version of the outline Soil Management Plan ("SMP") proposes to increase the density of sampling to 1:1 for the detailed SMP. This is intended to be captured in the statement of common ground ("SoCG") with Natural England.

Comments from Mr Brierley on behalf of the local host authorities on the reversibility of planting and potential need for additional

authorisations (such as felling licences) for the removal of trees and hedges

2.1.30 The Applicant confirmed that landscape planting would be a reversible use for the purposes of assessment. The Applicant accepted that this may not be solely at the whim of landowners, but the planting could be reversed.

Comment from the ExA that substantial tree felling may require a forestry licence or similar

2.1.31 The Applicant confirmed this is correct.

Comments from Mr Pike (on behalf of Stop East Park Energy) in relation to the use of best and most versatile land and soil quality

2.1.32 Please see the Applicant's response to Hearing Action Point 1 below, which captures the Applicant's response to the questions raised by Mr Pike in relation to BMV land and soil quality during the first part of ISH2.

HAP No.	Action Point	Applicant's Response
1	Applicant to respond in writing to points raised by Mr Pike on BMV and soil quality. In terms of BMV, Mr Pike invited the ExA to seek clarification from the Applicant on the following: 1. whether the applicant can identify any specific areas of predominantly lower grade agricultural land within technically feasible connection distance that were examined and rejected together with the reasons for their exclusion; 2. what analysis demonstrates that inclusion of extensive BMV land is no more than reasonably necessary in circumstances where	<u>Best and Most Versatile Land</u> 1. The Applicant set out the approach taken to identifying lower-grade agricultural land during their oral submissions at ISH2, which are summarised above. As set out, this principally relates to the Applicant's **ES Vol 2 Appendix 3-1 Site Identification Report [APP-058]**. The balancing exercise undertaken to reject alternative search areas is set out in Sections 6 and 7 of the **Site Identification Report [APP-058]**. 2. Firstly, the inclusion of BMV land is not the result of an excessive or inefficient land take. As set out at paragraph 5.6.4 of the **Design**

HAP No.	Action Point	Applicant's Response
	lower quality land may not have been voluntary available, but compulsory acquisition powers could have put that within the land assembly; and 3. what documentary evidence demonstrates how agricultural land quality was weighed against other site selection factors in concluding that this location represents the least harmful, practical option. In terms of soil quality, Mr Pike invited the ExA to seek clarification from the Applicant on the following: 1. whether all piled foundations, underground cables and various structures will be removed in full at decommissioning; 2. if any elements are to remain, what assessment has been undertaken of their implications for future agricultural use and soil function; 3. what evidence demonstrates that soil structure and fertility will be maintained at a level consistent with current productivity over the full operational period; 4. how will soil quality be monitored and what mechanisms will trigger remedial action if degradation occurs; and 5. how will the success of soil reinstatement be verified both after construction and decommissioning.	**Approach Document [APP-034]**, the extent of land for the solar energy generating station (Work No. 1) is approximately 446 hectares. That equates to approximately 2.75 acres per MW for a 400 MW scheme, which falls comfortably within the indicative land requirement identified at paragraph 2.10.17 of NPS EN-3 of 2 to 4 acres per MW. This demonstrates that the Scheme makes efficient use of land, rather than drawing in more land than is reasonably required for its generating capacity. Secondly, national policy does not require an applicant to identify, or compulsorily assemble, a wholly BMV-free solar site. NPS EN-3 is clear that land type should not be a predominating factor in determining site suitability, although where agricultural land use is necessary poorer quality land should be preferred and BMV land avoided where possible (paragraph 2.10.29). NPS EN-3 also expressly states that ground-mounted solar is not prohibited on BMV land (paragraph 2.10.30), and recognises that at utility scale it is likely that schemes will use some agricultural land, requiring applicants to explain their choice of site rather than eliminate agricultural land impacts altogether (paragraph 2.10.31). The policy test is therefore one of explanation, justification and preference where possible, not absolute avoidance. Natural England's provisional agricultural land classification indicates that, in general terms, the wider area of search around Eaton Socon Substation is itself characterised by land of generally higher agricultural quality than the location of the Site, as illustrated by Figure 6 of the **Site Identification Report [APP-058]**. The Applicant therefore considered agricultural land quality

HAP No.	Action Point	Applicant's Response
		and objectively targeted land assembly towards an area with the greatest potential to be of lower agricultural quality in broad strategic terms. At the same time, NPS EN-3 recognises that the capacity of the local grid network, the distance to the existing network and nearby available export capacity can have a significant effect on the technical and commercial feasibility of a solar proposal and may legitimately influence site selection. Agricultural land quality was therefore an important consideration from the outset but was not treated as the sole or determinative factor. Once it was established through detailed survey that the selected Site, not wholly unexpectedly, included a proportion of BMV land, there was no policy requirement to abandon the scheme and restart site selection process. NPS EN-1 states that there is no general requirement to consider alternatives or to establish whether the proposed project represents the "best" option from a policy perspective (paragraph 4.3.9). It further provides that alternatives are to be considered proportionately, that only alternatives capable of meeting the objectives of the proposed development need to be considered, and that the Secretary of State should assess alternatives by reference to whether they have a realistic prospect of delivering the same infrastructure capacity and benefits in the same timescale (paragraphs 4.3.22 to 4.3.24). NPS EN-1 also makes clear that an application should not be refused simply because fewer adverse impacts might arise on another suitable site (paragraph 4.3.24). So long as an applicant can show a rational site selection process, a preference for lower quality land

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		where possible, and a justified outcome, policy does not require the applicant to abandon a deliverable scheme and attempt to create a different one through compulsory acquisition. Compulsory acquisition powers should only be used where there is a compelling case in the public interest, and as a last resort. Against the above policy position and given the deliverability of the Scheme largely without the use of compulsory acquisition powers, it would not have been proportionate to restart site selection, particularly where the permanent BMV land loss is small in scale, evidence from Natural England's provisional agricultural land classification indicates that the area of search around Eaton Socon Substation is generally characterised by land of higher agricultural quality (indicating that the consideration of alternative land would be highly unlikely to return a different result to the Scheme), and the Scheme is temporary and reversible. 3. The Applicant has set out how agricultural land quality was weighed against other site selection factors within **ES Vol 2 Appendix 3-1 Site Identification Report [APP-058]**. <u>Soil Quality</u> 1. All piled foundations, underground cables, and structures would be removed at decommissioning. As set out in Section 2.4 of the **outline Decommissioning Environmental Management Plan [as updated alongside this submission]**: "*All solar PV modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, cable jointing chambers installed for the grid connection, and fencing would be removed from the Site and*

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		recycled or disposed of in accordance with good practice and market conditions at that time. 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. Cable conduit and casing will only be left in place where the damage caused by recovering them is considered greater than the environmental benefits of recovering and recycling them. The Site will be returned to a condition suitable for return to its original use after decommissioning. Confirmation of the approach to be taken including a benefits/impacts analysis of the impacts of the preferred approach will be set out in the final DEMP, and will take account of any contemporary legislation, regulatory guidance or best practice at the time of decommissioning." 2. As set out above, all infrastructure would be removed at decommissioning, with the potential exception of cable conduits which could be left in the ground where buried below 1m. This would not affect the future agricultural use and soil function of the land. The **outline Decommissioning Environmental Management Plan [as updated alongside this submission]** sets out that: "*The Site will be returned to a condition suitable for return to its original use after decommissioning.*" 3. During operation, substantial areas of the Order limits would move from intensive arable cultivation to long-term vegetated cover (grazing pasture/neutral grassland and other habitats), managed through the **outline Landscape and Ecological Management Plan [APP-159]**, **outline Operational Environmental Management Plan [APP-157]** and **outline Soil**

HAP No.	Action Point	Applicant's Response
		Management Plan [APP-161]. This land management change is expected to improve soil structure and functioning, support increases in soil organic carbon, and reduce runoff and siltation compared to periods of bare ground in arable rotations. The **outline Soil Management Plan [APP-161]** explains that, following reinstatement, topsoil will be cultivated and sown to establish permanent grassland under and around the solar arrays, providing a stable soil condition for operation (paragraph 5.1.17, **[APP-161]**). It further confirms that arable fields converted to solar use will not be cultivated annually, which helps build soil structure and organic matter (paragraph 5.1.18, **[APP-161]**), and that operational ground disturbance will be minimal (paragraph 5.2.1, **[APP-161]**). Where maintenance activities cause compaction, loosening (for example subsoiling) and re-seeding will be undertaken (paragraph 5.2.4, **[APP-161]**), supported by a soil health monitoring programme (including soil sampling or penetrometer testing) and remedial actions where issues are identified (paragraph 5.2.5, **[APP-161]**). **ES Vol 1 Chapter 13 Land and Soils [APP-049]** sets out at paragraph 13.7.13 how soils can be enhanced including many benefits to carbon sequestration in removing agricultural land from arable use and converting to grassland. 4. The Applicant has prepared an **outline Soil Management Plan [APP-161]** which sets out the framework for how soils will be managed across the lifetime of the Scheme. As set out above, the **outline Soil Management Plan [APP-161]** confirms that, during operation, "*a programme will be in place to monitor soil health in*

HAP No.	Action Point	Applicant's Response
		areas that are reinstated", which may include periodic soil sampling and or penetrometer testing to check compaction and whether soils continue to support the intended vegetation cover (paragraph 5.2.5, **[APP-161]**). Remedial action is triggered where monitoring or inspections identify degradation, such as compaction from maintenance traffic, which would trigger loosening (for example with a winged tine subsoiler or deep ripper) and re-seeding (paragraph 5.2.4, **[APP-161]**), and waterlogging or erosion identified through monitoring, which would trigger measures such as additional drainage, soil reinstatement, reseeding and localised erosion controls (paragraph 5.2.5, **[APP-161]**). 5. For construction, the **outline Soil Management Plan [APP-161]** commits to maintaining a soil handling log and taking photographic records of soil condition before stripping, after stripping and after reinstatement, providing an auditable record to evidence reinstatement outcomes (paragraphs 4.1.30 to 4.1.31 **[APP-161]**). Monitoring will also be undertaken post-decommissioning to ensure the soil is stable and to demonstrate compliance with any restoration conditions (paragraph 5.3.8, **[APP-161]**). Paragraph 9.2.4 **[APP-061]** states that "*The records held in respect of the SMP will be made available for the purposes of monitoring compliance where a request is made by the relevant local planning authority*."

Comments from Mr Woodward on the removal of temporary planting proposed

2.1.33 The Applicant set out that it is not proposed that planting would be removed at the end of the Scheme. It will be left to the landowners when the leases come to an end and land is returned to landowners.

2.1.34 It will be at the landowners' discretion ultimately whether to retain or revert the areas of planting back, acknowledging that other environmental protections may apply over the habitat features.

Comments from Mr Lacey on cost as a consideration in site selection and use of rooftops, brownfield land and transport links as alternatives for solar installation

2.1.35 The Applicant confirmed that cost was not a factor in ruling out brownfield land or previously developed land. Brownfield land registers were reviewed in the Site Identification Report and the Applicant sought to identify previously developed land but there was none of a scale that would suit the project.

2.1.36 In terms of rooftop solar, the Applicant does not disagree that rooftop solar should be delivered at a greater scale in England than is currently happening but it was not considered for a project of this scale that is seeking to meet a national need for solar generation. It is also unclear whether 400MW of rooftop solar would be viable on a technical basis.

Comments from Mr Rant on the 15km search area for the site.

2.1.37 The Applicant set out that it was determined from the outset by the Applicant's technical engineering team that a 400MW connection into Eaton Socon substation could be around 15km at most, beyond which the Scheme would likely no longer be viable. This is understood to be consistent with other NSIPs of comparative scale across the country.

Public comments on alternative points of connection

2.1.38 The point of connection given for the project was the Eaton Socon substation due to network capacity. The connection agreement is based on an offer from the National Energy System Operator ("NESO") based on an assessment of capacity where export is possible to the grid. A connection was only offered at Eaton Socon substation, not alternatives such as Little Barford Power Station.

2.1.39 The Applicant noted that the country has a market based electricity system and the developer must operate within that, including the way that the system allocated grid connections, which is what has been done.

Questions from the ExA on the impact of the Scheme on regional and national supply of best and most versatile land

2.1.40 Please see the Applicant's response to Hearing Action Point 2 below.

HAP No.	Action Point	Applicant's Response
2	Applicant to clarify wider impact of scheme on regional and national supply of BMV.	The Applicant is not aware of a contemporary record of the national or regional supply of BMV land in England. *Natural England Technical Information Note TIN049*[1] from 2009 estimated that Grades 1 and 2 together form about 21% of all farmland in England, and that Subgrade 3a also covered about 21% - thus, the total BMV land in England was estimated to be approximately 42% of all land. The total utilised agricultural area (UAA) in England was approximately

[1] https://publications.naturalengland.org.uk/publication/35012?category=23033

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		8.8 million hectares in 2025[2]. Applying the 42% estimate gives an approximate BMV total of about 3.7 million hectares. On the basis of the above, the BMV land utilised by the Scheme (circa 551 hectares) would utilise approximately 0.015% of BMV land in England. The Applicant's position is that this impact is negligible, and the Scheme would not pose a risk to UK food security.

[2] https://www.gov.uk/government/statistics/agricultural-land-use-in-england/agricultural-land-use-in-england-at-1-june-2025#:~:text=for%20further%20details.-,Key%20points,were%20used%20for%20environmental%20benefit.

2.2 Agenda Item 4 – The Effects on Food Production and Soil Quality

The Effects on Food Production

2.2.1 The Applicant explained that food security is shaped by a number of interacting factors such as supply, demand, international and domestic trends, inputs and outputs, perception of food safety and consumer confidence. It is not simply a matter of the quantity or value of food grown in the country.

2.2.2 Defra's summary of the overall assessment of UK food security is a broadly stable picture even following a period of global supply chain shocks such as the Russian invasion of Ukraine. However, Defra warns that this should be seen in the context of longer-term risks from climate change, with the recent example given of an exceptionally wet winter and spring in 2024 which posed challenges to some domestic production.

2.2.3 The production to supply ratio from Defra's Agriculture in the United Kingdom 2024 shows a broadly stable trend in the last 20 years, with production at c60% for all food consumed within the country and c75% for indigenous foods in this country (i.e. the UK relies on imports for roughly 40% of its food). The gap in this ratio between all food and food that can be produced in this country has remained stable for the last 70 years, and the only time since the Second World War when these proportions were higher than currently were in the 1980s and 1990s when common agricultural policy subsidies led to overproduction throughout Europe and the dumping of commodities on the world markets.

Post-Hearing Note: *Whilst not shared during the hearings, the Applicant takes this opportunity to illustrate this in the figure provided below:*

Food production to supply ratio

Figure 14.3 Food production to supply ratio, United Kingdom, 1956-2024

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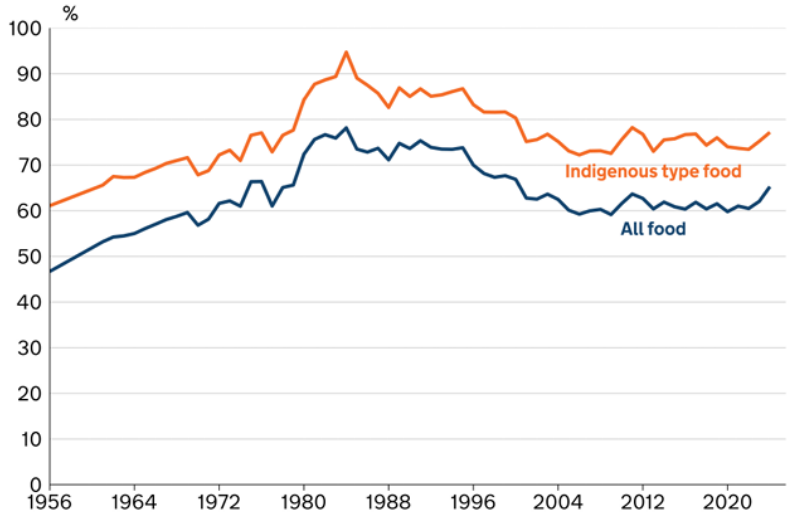

Source: Defra analysis of HMRC Overseas Trade Statistics

2.2.4 The UK Food Security Report 2024 indicates that the UK produces most of its own cereals, with the production to supply ratio continuously over 80% for the last 20 years (and increasing to 93% in 2023). There is still a need to import cereals, such as varieties of milling wheat that cannot be grown in the UK climate. There is also variability from year to year depending largely on weather events and market fluctuations but generally production is between 20 and 25 million tonnes per annum.

2.2.5 The Applicant's position is that the Scheme would not significantly affect food security or agricultural production. This aligns with the Government's position set out in the UK Solar Roadmap (June 2025) which notes that Government does not consider that increased solar deployment poses a threat to food security, and that "the biggest risk to food security and the natural environment is the climate and nature crisis".

2.2.6 In terms of agricultural production, Table 13.13 of **ES Vol 1 Chapter 13 Land and Soils [APP-049]** sets out the agricultural land taken out of arable use from Sites A-D which totals 694.8 hectares. The Site is predominantly in use as arable farmland, including cereal crops as well as uses such as

Sustainable Farming Incentive (SFI) groundcover mixes. On this basis, wheat is used as an example crop as a reasonable way to express the scale of foregone arable output, noting that actual farm rotations will vary year to year and that wheat is the highest yielding combinable arable crop.

2.2.7 The 5-year average wheat yield across the East of England region has been 8.0 tonnes per hectare (from 8.4 t/ha in 2023 to 7.1 t/ha in 2025). The national average is lower at 7.8 t/ha.

2.2.8 Taking the 694.8 hectares of agricultural land removed from arable production by the Scheme, and assuming this land was used in its entirety to grow wheat with a yield of 8.0 t/ha, then the annual lost agricultural production would be 5,558.4 tonnes of wheat.

2.2.9 The 5-year average wheat production across the East of England region has been 3,424,710 tonnes per year. The national 5-year average is 12,862,161 tonnes per year.

2.2.10 In this context, the loss of agricultural production at the Site would equate to a loss of 0.16% of total production in the East of England or 0.043% of the national total.

2.2.11 The Applicant notes this is a very marginal number, even when based on a simplified calculation that makes conservative estimates based on a single (highest yielding) crop. If crop rotation was allowed for in the above estimate, the Scheme's percentage reduction against regional and national wheat production would reduce proportionately, balanced by reductions in production of other crops against regional and national averages. Moreover, the loss of crops would be those in which the UK is largely self-sufficient, as evidenced by the UK Food Security Report 2024.

2.2.12 More widely, the Applicant notes the impact of solar on agricultural production against other land use changes, such as the Government's SFI initiative. The most recent SFI data published in October 2025 notes at Table 2 that SFI actions which take land out of agricultural production result in the temporary

loss of 340,000 hectares of land. Government notes that “in extremis, almost all of this land could be brought back into production within one growing season”. This is comparable to solar, where “in extremis”, land could be reverted to agricultural production.

2.2.13 If all new solar capacity modelled in the ‘high end’ policy scenario of the UK Solar Roadmap were to be ground mounted it would occupy no more than 0.6% of the UK’s utilised agricultural land by 2030, equating to 100,800 hectares. The Applicant notes this is less than a third of the land currently taken out of production for the SFI initiative.

2.2.14 The Applicant’s position is that the Scheme would not pose a significant risk to UK food security.

2.2.15 Further information is provided in the Applicant’s response to Hearing Action Points 4 and 5 below.

HAP No.	Action Point	Applicant’s Response
4	Applicant to follow up with additional detail of analysis relating to solar farms and food security.	The Applicant has provided above a written summary of its oral submissions made at ISH2 in relation to food security. The Applicant further notes that Government explicitly addresses the misconception that ‘Solar is a threat to food security’ in Appendix 2[3] of its UK Solar Roadmap 2025.
5	Applicant to respond in writing to clarify solar roadmap figures for land use.	The Solar Roadmap figures referenced by the Applicant during ISH2 related to the 2030 target, where Government has set out that if all new solar capacity modelled in the ‘high end’ policy scenario of the UK Solar Roadmap were to be ground mounted it would occupy no more than 0.6% of the UK’s utilised agricultural land by

[3] https://assets.publishing.service.gov.uk/media/68624ee9c2633bd820a92bda/Appendix_2-_Case_Studies_and_Misconceptions_.pdf

HAP No.	Action Point	Applicant's Response
		2030[4], equating to 100,800 hectares (c.249,000 acres).

[4] https://www.gov.uk/government/publications/ground-mounted-solar-energy-plants-predicted-land-use/ground-mounted-solar-energy-plants-predicted-land-use

2.3 Agenda Item 5 – Construction traffic routes

The Applicant's proposals in relation to construction traffic

2.3.1 The Applicant set out that the main site construction compound will be situated within Site D, as illustrated on the **Indicative Construction Access and Compounds plan (ES Vol 3 Figure 2-5) [APP-125]**. Access to this compound will be via a new priority junction to be constructed with the B645 (labelled as access SA16, as illustrated on the **Proposed Site Accesses plan (ES Vol 3 Figure 2-4) [APP-124]**. This is referred to within the submission as the main site access.

2.3.2 As a general overarching principle, the majority of construction related traffic will access the Site via this main access (SA16) and then effectively fan out westwards through a series of internal tracks, only needing to go back onto and off the public highway in a few isolated areas that are situated mostly away from nearby settlements, as far as practicable. There will be a number of smaller satellite compounds in Sites, A, B and C, details of which are also shown in **[APP-125]**, and discussed in the **Outline Construction Traffic Management Plan [APP-156]**.

2.3.3 These 9 satellite compounds would be smaller in scale and nature than the main construction compound in Site D, and would provide additional offices and welfare facilities that are more localised to the areas of activity in each Site area.

2.3.4 Turning back to the main site access, it is proposed that all construction traffic (including HGVs and construction staff vehicles) will be routed to the main site access along the B645 from the A1 at St Neot's. No construction vehicles would travel to the site from the A14 or from any other junction on the A1. At the request of Cambridgeshire County Council, all HGV traffic will be directed to use the northbound exit and entry slip roads only at the A1 junction, so as to avoid passing through the residential areas of Eaton Ford.

2.3.5 As mentioned earlier, in order to minimise the impact on neighbouring settlements, in particular Staughton Highway and Great Staughton, a series of temporary access roads will be constructed through the site to allow construction traffic to access Sites C, B and A by routing through the main site access, without requiring wide-scale use of the public highway, as far as practicable.

2.3.6 The connection between Site D and Site C will require a single crossing point over Moor Road (accesses SA14 and SA15). From Site C, and in order to avoid large volumes of construction traffic passing through Great Staughton, a temporary access track will be constructed which will connect to the existing access junction for the Zantra Business Park (SA12), which connects to Great Staughton Road to the west of Great Staughton, therefore, construction traffic will bypass that village. This access is of a suitable standard to accommodate HGV movements.

2.3.7 From access SA12, vehicles will travel westwards along Great Staughton Road for approximately 1km as far as Spring Hill Road (which is the C11), and would then travel south along a widened Spring Hill Road for approximately 330m as far as access SA10 to access Site B.

2.3.8 Between Site B and Site A, vehicles would be routed westwards via the internal access roads, crossing the Green End, close to Lodge Farm (accesses SA07 and SA08) as far as the B660 Kimbolton Road (access SA02). At the B660 vehicles would travel northwards along the public highway for approximately 70m before accessing Site A using the existing Manor Farm access junction (access SA01). Departing vehicles would follow the same route in reverse.

2.3.9 Site B also has a number of other site access junctions which would be much less well used, and which would require construction traffic to use short sections of the public highway along Green End (access SA09), and Great Staughton Road via Green End (accesses SA03, SA04, SA05 and SA06).

Vehicles would be routed to each of these accesses from accesses SA07/SA08.

2.3.10 In order to minimise the number of construction staff movements around the site, it is proposed that a fleet of minibuses will be provided to transport workers from the main construction compound in Site D to the outlying site areas, and by maximising use of the internal system of tracks.

2.3.11 In terms of construction traffic trip generation, the assumed breakdown of the numbers of HGVs and construction staff that would be required throughout the construction phase has been calculated based on the estimated materials required.

2.3.12 The trip generation calculations forecast that HGV movements would be greatest during the first 3 months of the construction phase, and this would be associated with the delivery of aggregate for the construction of access tracks, compounds and foundations and peaking in month 2. During this period there would be a maximum of 60 two-way HGV movements per day along the B645, 26 two-way movements along Great Staughton Road and Spring Hill, and 10 two-way movements along the B660.

2.3.13 There would be a requirement for approximately 500 construction staff per day on average across the full 30-month construction period. The period of activity requiring the maximum number of staff on site would occur in month 12, when there would be a maximum of approximately 854 staff per day.

2.3.14 Construction activity would occur between 08:00-18:00 on weekdays and 08:00-13:00 on Saturdays, with no activity on Sundays. In this way, construction traffic would be taking place outside of the typical highway peak hours of 08:00 – 09:00 and 17:00 – 18:00.

2.3.15 The current draft of the **Outline Construction Traffic Management Plan [APP-156]** sets out the manner in which construction traffic would operate and be manged in more detail. The oCTMP is currently under review, and is

due to be updated by Deadline 1, with more information, so as to respond to Relevant Representations.

Questions from the ExA and the local highway authorities on the number of vehicles that will enter through Site D

2.3.16 The Applicant is committed to sending almost all construction traffic through Site D with the exception of isolated vehicle movements that will need to go across the network to set up accesses and the like at the initial stages of the construction activities. The aim is to avoid impacting settlements as much as possible.

Question from the ExA on the how sustainable travel options for construction workers will be imposed

2.3.17 The updated oCTMP will assist with this, which will contain a new appendix with an updated outline construction workers travel plan ("CWTP") to provide reassurance on encouragement and enforcement. A draft of the outline CWTP has been shared with the local highway authorities and National Highways.

Question from the ExA on the routing of abnormal indivisible loads ("AIL")

2.3.18 Appendix A of the **outline CTMP [APP-156]** contains a report prepared by Wynns who are one of the UK's best consultants on AILs. Wynns have not produced a tracking diagram for the AIL vehicle as they concluded it was not needed based on the route assessment.

2.3.19 The Applicant confirmed that all of AILs will enter through Site D.

Question from the ExA on the community liaison group referenced in the oCTMP [APP-156]

2.3.20 Please see the Applicant's response to Hearing Action Point 6 below.

HAP No.	Action Point	Applicant's Response
6	Applicant to confirm in writing who would be included in community liaison group and how individuals would be included in the group (as set out in section 3.2 of oCTMP)	Individuals would be able to raise concerns via Parish Council representatives or local community groups. In addition, a contact phone number for the appointed Community Liaison Officer for the Scheme would be posted on signage around the site to allow members of the public to raise issues directly.

Question from ExA on National Highways representation in relation to the impact on the junction between the A1 and B645 during peak hours

2.3.21 The Applicant has recently commissioned baseline traffic surveys of the junction and has recently received the results. A capacity assessment will be carried out using proprietary TRL software to assess performance of the junction with the development construction traffic development in place at peak month 12, including cumulative development assessed, and with growth of traffic for year 2028/2029. Early indications suggest there will be no issues however.

2.3.22 Further information can be found at Hearing Action Point 7 below.

HAP No.	Action Point	Applicant's Response
7	Applicant's junction capacity modelling to be carried out at the junction of the B645 and the A1 to include sensitivity	The Applicant has undertaken the junction capacity modelling and this has been submitted into the Examination as document **Technical**

HAP No.	Action Point	Applicant's Response
	test on the basis of a car occupancy ratio of 1.4.	**Note on Impact on A1 / B645 St Neots Junction [EN010141/DR/8.23]**. The junction modelling has not indicated any capacity or queuing issues, even in the sensitivity test scenario (1.4 workers per car) and including allowances for cumulative impact with High Wood Solar Farm construction traffic and future baseline traffic growth.

Comments from Mr Stapleton (on behalf of Bedford Borough Council) on HGV routing and monitoring measures, swept path analysis and visibility splays and removal of hedgerows

2.3.23 The Applicant agreed to provide a copy of the plan showing HGV routing shared at the hearings and to comment on the monitoring measures comments in writing. Please see the Applicant's response to Hearing Action Point 8 below.

2.3.24 In terms of junction visibility and swept path plans, the Applicant is aware of the views expressed in Bedford Borough Council's relevant representation. In terms of the use of the Manual for Streets instead versus the Design Manual for Roads and Bridges ("DMRB") for visibility, stopping distances and standards, the Applicant will impose temporary speed limit reductions at many of the access locations, which will reduce the stopping distance and visibility requirements. Further information can be found at Hearing Action Point 9 below.

2.3.25 The Applicant noted Mr Stapleton's comment around measuring visibility splays to the tangent point as well as the question around the extent of hedgerow removal. Further information can be found at Hearing Action Point 10 below.

HAP No.	Action Point	Applicant's Response
8	Applicant to share Proposed Construction Access Strategy plan with local highways authorities.	The Applicant has included the figure shared at ISH2 as Appendix C of the updated **outline Construction Traffic Management Plan submitted at Deadline 1**.
9	Applicant to respond in writing to points raised by Mr Stapleton (on behalf of the Host Authorities): 1. Mr Stapleton suggested that ANPR and cameras could be used to ensure vehicles are entering and departing the site using the correct access point. 2. Mr Stapleton suggested a strong set of management measures will be needed to ensure reporting of non-compliance, actions and remedial measures. 3. Mr Stapleton stated that accesses should be in line with DMRB, and management measures will be required where visibility splays are shorter than DMRB. 4. Mr Stapleton stated that BBC have some comments on the tangent of visibility splays to the radius of the bend where access points are on the outside of the bend. 5. Mr Stapleton requested details of management measures for haul roads that are too narrow for two HGVs to pass (holding areas, passing places, marshals or other management measures).	1. This comment is noted. The Applicant is investigating various ways in which to strengthen the monitoring and enforcement of HGV traffic movements, including but not limited to geofencing and ANPR cameras. 2. The proposed measures for enforcement of the CTMP and the processes to be followed in the event of non-compliance are set out in section 9.3 of the **oCTMP [APP-156]**. The CTMP currently sets out a "three strikes and out" system of enforcement. However, consideration could be given to strengthening this by removing the intermediate "second warning" stage, and / or through a progressive scheme of enforcement that first targets individual drivers and then the contracted haulage companies. 3. The **oCTMP [as submitted at Deadline 1]** now includes a series of drawings, in Appendix D, showing the site access drawings and the associated temporary speed limit and traffic management measures that are set out within Articles 12, 17 and Schedule 8 of the Draft DCO. Junction visibility splays are indicated that correspond to either the posted speed limit or observed design speeds, and the reduced temporary speed limits that are proposed at the majority of the site accesses. 4. Where relevant, the drawings included at Appendix D of the updated **oCTMP [as submitted at Deadline 1]** also show the visibility splays drawn to the tangent points

HAP No.	Action Point	Applicant's Response
		of the surrounding highway, as requested. 5. Indicative widening to the internal haul roads at the main intersections of the permanent Site access junctions is shown on the drawings included at Appendix D of the updated **oCTMP [as submitted at Deadline 1]**. Further widening can, if deemed necessary, be included and confirmed at the detailed design stage.
10	Applicant to check and confirm in writing extent of any hedgerows impacted by visibility splays and management measures.	As set out above, the Applicant has updated the visibility splay drawings which are now provided at Appendix D of the **oCTMP [as submitted at Deadline 1]**. The required visibility splays would not involve the removal of any hedgerows, but could involve annual pruning of hedgerows should foliage grow out to obstruct visibility; this is covered in Section 5.4 of the oCTMP.

Comments from Mr Tuttle (on behalf of Cambridgeshire County Council) on traffic management measures

2.3.26 Please see the Applicant's response to Hearing Action Point 11 below.

HAP No.	Action Point	Applicant's Response
11	Applicant to respond in writing to points raised by Mr Tuttle: 1. Mr Tuttle suggested geofencing as a potential method for monitoring vehicles. 2. Mr Tuttle suggested a "one strike and you're out" procedure for non-compliance with routing.	1. This comment is noted. The Applicant is investigating various ways in which to strengthen the monitoring and enforcement of HGV traffic movements, including but not limited to geofencing and ANPR cameras. At the time of writing, investigations into the feasible options / systems are ongoing in this regard.

HAP No.	Action Point	Applicant's Response
		2. The Applicant considers that a "one strike and out" policy would be overly punitive and would not be acceptable to contractors. The oCTMP currently sets out a "three strikes and out" system of enforcement. However, consideration could be given to strengthening this by removing the intermediate "second warning" stage and / or through a progressive scheme of enforcement that first targets individual drivers and then the contracted haulage companies.

Comments from Mr Dijkhuis (on behalf of Bedford Borough Council) on phasing and management plans, including replacement of elements of the Scheme

2.3.27 The outline CTMP will apply for the duration of the construction phase.

2.3.28 The **outline Operational Environmental Management Plan (OEMP) [APP-157]** includes measures relating to traffic and transport, but the number of traffic movements in the operational phase will be much more limited unless there was a particular replacement campaign. Table 2.2 of the outline OEMP sets out the items may require replacement during the lifespan of the development. If it is intended that more than 20% of panels are to be replaced a notification must be submitted to the relevant local planning authority for approval with details of the management measures that are proposed to be put in place for those replacement activities, that are consistent with the principles of the construction environmental management plan (CEMP), public right of way management plan (PRoWMP), construction traffic management plan (CTMP) and OEMP that had been approved for the construction for the Scheme, but are also commensurate to the scale of activity proposed.

2.3.29 At decommissioning the is an outline DEMP includes a requirement to prepare an outline DTMP. It is difficult to confirm what the status of the local landscape would be 40 years from now which is why details will need to be approved at the relevant time.

2.3.30 Further information can be found at Hearing Action Point 12 below.

HAP No.	Action Point	Applicant's Response
12	Applicant to provide traffic figures for replacement activities.	Based on the indicative operational life cycle of scheme components set out in Table 2-1 of the **outline Operational Environmental Management Plan [APP-157]**, it is anticipated that electrical equipment, e.g. solar panels, transformers, inverters, the BESS units and cabling, will only require replacement once at most throughout the operational phase. Ancillary items such as fencing and CCTV equipment could require replacement up to three times. Based on the trip generation assumptions used to calculate the number of HGV movements in the construction phase, a total of 1,591 HGV deliveries would be required to fully replace every electrical component once during the operational phase. These deliveries can be broken down as follows: • 1405 deliveries for solar panel replacement • 11 deliveries for string inverter replacement • 2 deliveries for replacement of central inverters • 52 deliveries for replacement of transformers • 96 deliveries for BESS unit replacement • 24 deliveries for battery transformer replacement • 1 delivery for replacement of auxiliary transformer A further 84 HGV deliveries would be required in total for the replacement of

HAP No.	Action Point	Applicant's Response
		ancillary equipment, comprising 69 deliveries for replacement of fencing and 15 deliveries for replacement of CCTV equipment. This equates to 28 HGV deliveries at three separate periods of the 40-year operational phase. The total number of HGV deliveries required for replacement activities equates to 27.6% of the total number of HGVs required during the construction phase. This is because the majority of HGV deliveries required during the construction phase are associated with importing stone for site tracks, concrete for foundations and equipment delivery. Assuming that all electrical equipment is replaced over a five-year period (as per paragraph 2.4.10 of the **outline Operational Environmental Management Plan [APP-157]**, this would equate to a total of 80 HGV deliveries per month, assuming replacement campaigns occur across a four-month period each year. This equates to approximately 2.6 HGV deliveries (5 two-way movements) per day, on average. It is considered that this level of additional movement would be imperceptible when set against general background traffic. Assuming that each replacement of the ancillary equipment (fencing and CCTV) occurs across a period of one month, this would equate to 1 delivery (2 two-way movements) per day, on average, across three months spread throughout the 40-year operational phase. During a replacement campaign the Operations and Maintenance Area would be used to provide a central hub for temporary storage of components, welfare and parking. Replacement panels and cabling would be delivered on a phased basis to meet the requirements of replacement crews working within a specific panel-replacement area. Components would be laid down temporarily on existing stoned access tracks where appropriate or between panel rows.

HAP No.	Action Point	Applicant's Response
		Should ground conditions dictate, then temporary ground protection matting would be deployed along access routes and laydown areas to prevent soil compaction and damage to grassed surfaces. All matting would be removed following completion of the works. Assuming four crews of five operatives each (20 operatives total), the Applicant estimates that a campaign to replace 20% of the panels would last approximately four months, substantially less than for the original construction period. During a replacement campaign, works will be undertaken using a phased and sequential approach. While more than one works crew may be operating at any one time, each crew will progress gradually and systematically through the panel areas rather than working across the entire Site simultaneously as this would be a more efficient work process. This approach ensures that the area of activity remains localised, with disturbance confined to a limited area at any given time. As crews complete works in one area, they will move on to the next, allowing previously affected areas to be reinstated and reducing the overall extent and duration of disturbance at any one time.

Comments from Councillor Sira of Wyboston Ward on concerns around the suitability and condition of the local road network

2.3.31 The Applicant is not intending to send material amounts of traffic anywhere on the local highway network apart from between the A1 and B645. Any traffic on the types of roads referred to by the Councillor will be minimal and will be associated with localised access to some of the access.

2.3.32 The Applicant noted that there is a commitment to carry out pre-condition surveys contained in the updated **oCTMP [as submitted at Deadline 1]**.

2.3.33 Further information can be found at Hearing Action Point 13 below, which also includes information on comments raised later in the hearings by Councillor Sira on traffic management and cumulative effects.

HAP No.	Action Point	Applicant's Response
13	Applicant to respond in writing to Councillor Sira on construction traffic and traffic management Councillor Sira raised the following questions in relation to construction traffic: • what independent assessment has been undertaken on the structural capacity and current condition of the local road network • what specific mitigation measures are proposed to prevent road damage, not just manage traffic flow; • whether the applicant will commit to pre-construction road condition surveys and full remediation of any damage caused, secured through an enforceable agreement; and • how will this be monitored and enforced over the duration of the construction period. Councillor Sira raised the following questions in relation to traffic management: • who is responsible for ensuring compliance on a day to day basis; • what mechanisms are in place to identify and respond to breaches in real time; • what robust and enforceable mechanisms will be in place to monitor compliance with traffic management measures on a continuous basis; • who will be responsible for enforcement of these measures;	In response to Councillor Sira's comments in relation to construction traffic: • The **oCTMP [APP-156]** sets out the commitment to undertaking pre- and post-construction highway condition surveys, and the commitment to restoring any damage resulting from construction traffic to the satisfaction of the relevant local highway authority. This tallies with and exceeds the powers that are generally available to the Highway Authorities to recover the costs of damage caused by 'extraordinary' traffic under S59 of the Highways Act. Regular site inspections of the condition of the highway network will also be undertaken by the site management team on an ongoing basis throughout the construction phase. In response to Councillor Sira's comments in relation to traffic management: • The Principal Contractor will appoint a Construction Project Manager who will have overall responsibility for the implementation of the final CTMP and all other DCO and legislative requirements. Points two and three have been addressed in the Applicant's response to action points 3 and 5. The Principal Contractor and Local Highway Authority(s) will be responsible for enforcing the

HAP No.	Action Point	Applicant's Response
	• what powers or controls will they have to intervene if measures are not adhered to; • what remedial actions will be triggered if traffic limits are exceeded, routes are not followed, or disruption exceeds assessed levels. Councillor Sira raised the following questions in respect of cumulative effects: • what active liaison has taken place with East West rail and the Black Cat project teams in developing traffic management plans; • is there a shared or coordinated traffic management framework to ensure that multiple schemes do not operate in conflict with one another.	measures set out in the final CTMP. In the event that any of the measures in the CTMP are breached, the Principal Contractor will be required to discuss and agree with the LHA an action plan identifying any remedial action and additional mitigation measures that may need to be implemented. In the event of multiple breaches, the Principal Contractor will be required to remove the relevant party from the Site. In response to Councillor Sira's comments in respect of cumulative effects: • No liaison has taken place with East West Rail with regard to cumulative traffic impacts at this stage, as it is not expected that there would be any overlap in the construction phases of the two schemes. Similarly, it is anticipated that the Black Cat-Caxton Gibbet scheme will be completed prior to the commencement of construction of the proposed development. National Highways has not raised any issues relating to potential cumulative impacts arising from these schemes. Within the CTMP there is a commitment to establishing a joint Construction Traffic Management Plan Working Group with representatives of other schemes which by the local highway authority / National Highways as having the potential to generate significant cumulative construction traffic movements.

Comments from Mr Pike (on behalf of Stop East Park Energy) on the local road network and impact on Great Staughton, including a question around how access SA16 will be constructed

2.3.34 The intention is to send almost all construction traffic through Site D, which will bypass Great Staughton. The construction of the access will be for the principal contractor and is something that can be overcome as an engineering challenge in any normal way. Traffic management will be used. While the Applicant cannot confirm how long the works will take it should not be more than a matter of weeks.

2.3.35 Further information can be found at Hearing Action Point 14 and 15 below.

HAP No.	Action Point	Applicant's Response
14	Applicant to respond in writing to Mr Pike in relation to construction traffic and traffic management matters: Mr Pike raised the following questions in relation to construction traffic: 1. whether the Applicant has driven the route down the B645 noting the condition of the local route network and suitability for HGVs; 2. how the Applicant proposes to construct access SA16, where there is currently a drainage ditch abutting the road barrier, and has the Applicant considered how long it will take to build; 3. how much traffic will be put through Great Staughton and the surrounding network before internal construction roads are built; 4. whether the construction routes relied upon in the environmental statement will be secured through binding requirements in the development consent order, including explicit prohibition, prohibitions on alternative routes and enforceable obligations on all contractors and subcontractors;	1. The Applicant has driven the route down the B645. It is considered to be of a suitable standard to accommodate the forecast volume of HGVs. The local highway authority, Cambridgeshire County Council, has not raised any issues regarding the proposed use of the B645 for HGV access. 2. It is considered that the construction of the main site access junction in the identified location does not represent a particularly complex or unusual engineering challenge. Access junctions are routinely constructed with culverts to accommodate drainage ditches. It is anticipated that construction of the initial section of the main site access would take no more than 2-3 weeks. 3. Direct traffic movements to outlying areas of the site area, including movements through Great Staughton as part of the Site Preparation Works, will be extremely limited, and likely imperceptible when set against general background traffic. This will likely comprise one or two vehicles per day, which will

HAP No.	Action Point	Applicant's Response
	5. what safeguards would prevent diversion through nearby villages not assessed within the baseline if congestion or disruption occurs on the primary corridor, and what enforcement mechanisms would apply if such diversion nevertheless occurs; and 6. why does the draft development consent order not include an explicit no through routing schedule for sensitive settlements if avoidance of those areas forms part of the assessed mitigation and the material component of the impact assessment. 7. Mr Pike also queried whether the applicant will commit to enforceable restrictions on construction traffic during school travel periods and peak commuter hours on the face of the draft DCO, and if not, what evidence demonstrates that such protections, protections are unnecessary in this location.	comprise work teams travelling in a van or four-wheel drive vehicle for the purpose of opening / closing security gates and setting up traffic management. There would be no HGV movements through Great Staughton. The network of internal haul roads would be constructed outwards from the main site access in Site D. 4. It is not proposed to include binding requirements on construction routes, including identifying prohibited routes, within the schedules of the DCO. The identified construction traffic access routes are set out within the CTMP, which also includes the proposed measures for monitoring construction traffic movements and enforcing any breaches. The CTMP is secured by the DCO. 5. Any deviation from the proposed construction access route would be considered a breach of the CTMP unless vehicles are following an official diversion route put in place by National Highways or the local highway authorities. The enforcement mechanisms to ensure contractors follow the correct protocol are set out in the CTMP. 6. It is considered that the monitoring and enforcement mechanisms set out in the CTMP will provide the necessary level of safeguarding against any breaches. 7. The measures set out in the CTMP identify that HGV movements will be scheduled to occur outside of highway peak hours wherever possible. It is not proposed to include any specific restrictions on movements during school travel periods as there are no schools located directly on any of the roads which make up the proposed construction traffic access route. Such measures could be included if requested by the local highway authorities. The CTMP is secured

HAP No.	Action Point	Applicant's Response
		by Requirement 8 of the draft DCO.
15	Applicant to prepare and submit fly through footage of construction routes.	The Applicant has submitted a video **Drive Through of Local Highway Network [EN010141/DR/8.25]** at Deadline 1 as requested.

Comments from Mr Lacey on car sharing ratio used in assessment

2.3.36 The Applicant noted that the car sharing ratio is ambitious and is a challenging target but has been set deliberately in accordance with the government's decide and provide (or vision led approach) advocated in the NPPF. The Applicant will publish an outline Construction Workers Travel Plan at Deadline 1.

2.3.37 A sensitivity test has also been carried out to assess the implications of a different car sharing ratio of 1.4, which is considered to result in an additional 366 two way car movements on top of the 854 two way peak movements (noting that the average number of movements across the construction period will be 500). In this sensitivity test traffic numbers would still not increase above the 30% threshold in the IEMA guidelines along the B654 and A1.

Question from the ExA following public comments on the age of the accident data used for the Transport Assessment

2.3.38 The Applicant confirmed that accident data will be updated by the end of examination. Further information can be found at Hearing Action Point 16 below.

HAP No.	Action Point	Applicant's Response
16	Applicant to update accident data by the end of the examination.	The Applicant will work with the Local Highway Authorities to provide an update to the accident data by the end of Examination.

Public comments on safety and accidents along the B645

2.3.39 The Applicant confirmed that the area is not defined as an accident cluster site.

Question from Mrs Stokes on whether all goods will be delivered from south to north on the A1

2.3.40 The Applicant confirmed that the routing strategy will involve all traffic approaching from the south.

Question from Mr Rant on whether the Applicant had travelled the proposed route for construction traffic, noting the presence of large potholes on the road.

2.3.41 The Applicant confirmed that it had travelled both East and West along the proposed route.

2.3.42 The Applicant stated that it had seen the potholes referred to, which is something for the local highway authority to address as part of its duty to maintain the highway under section 41 of the Highways Act 1980. Construction will not begin for some time and the issues identified should have been resolved by the local highway authority before then. If any damage is caused by the Applicant it will be remedied by the Applicant.

2.4 Agenda Item 6 – Traffic Management

The Applicant's traffic management proposals

2.4.1 The Applicant set out that the proposed traffic management measures are described in Schedule 8 of the **draft DCO [AS-008]** and illustrated in the **Traffic Regulations Measures Plan [APP-011]**.

2.4.2 Temporary traffic regulation measures are proposed at the following locations:

a) B660 Kimbolton Road to the south of access SA02

b) Great Staughton Road between accesses SA03 and SA06

c) Green end in the vicinity of accesses SA07 to SA09

d) Spring Hill between Great Staughton Road and accesses SA10 and SA11

e) Moor Road around the temporary access road crossing point SA14 and SA15

f) B645 around the main site access point SA16

g) Duloe Lane around the temporary access road crossing point SA17 and SA18

h) Bushmead Road around the temporary access road crossing point SA19 and SA20

2.4.3 Temporary traffic signals will be deployed to manage vehicle movements across the B660, Moor Road, Duloe Lane and Bushmead Road, as well as in other areas where necessary to facilitate the installation of cable connections and the delivery of highway improvement works. Temporary traffic signals are also proposed during peak periods of construction activity at the main site access (SA16).

2.4.4 We are proposing temporary speed limits to protect the workforce and address some of the comments by the LHAs in relation to visibility splays from some of the site accesses.

Question from Mr Pike (on behalf of Stop East Park Energy) for time based HGV embargoes during school traffic periods and peak commuter hours.

2.4.5 The Applicant notes that whilst the Applicant has not discussed this with the local authorities, as the working hours for the Scheme are outside of normal peak hours it is assumed that traffic will arrive before the peak hour and would depart after.

2.5 Agenda Item 7 – Cumulative Impacts from other projects

The Applicant's approach to assessing cumulative impacts

2.5.1 The Applicant set out that at the Scoping Stage the Applicant set out their proposed methodology for the assessment of cumulative effects. At that stage it did not include an initial long list or shortlist. In their Scoping Opinion the Planning Inspectorate and others confirmed that the use Advice Note 17 (Advice on Cumulative Effects Assessment) was appropriate. The Planning Inspectorate also advocate that the Applicant established a defined zone of influence (ZoI) around the development, within which there is potential for significant cumulative environmental effects to occur.

2.5.2 In preparing the Cumulative Effects Assessment (CEA) the Applicant has followed the guidance and approach contained within the Planning Inspectorate's Advice Note 17 (2024). Specifically, ensuring that

a) a ZOI is establishment for the assessment of potentially significant cumulative effects;

b) agreeing the ZOI and cumulative schemes in consultation with the host authorities and other statutory bodies;

c) following the 4 stage assessment process being the establishment of a long list, a short list, information gathering on the shortlisted schemes and then carrying out an assessment of cumulative effects; and

d) the assessment is focussed and proportionate with relevance to the ZoI.

2.5.3 During the production of the PEIR and prior to carrying out statutory consultation the Applicant agreed individual ZoI's for each of the environmental topics to be included in the assessment of cumulative effects. These were discussed and agreed with the statutory consultation bodies as part of discussions on the assessment methodologies and with the three host planning authorities. The latter also provided input into the initial long list of sites the Applicant had established for assessment.

2.5.4 A ZoI of 10km was established for the project, which has been used for the assessment of cumulative effects. Whilst a 10km ZoI has been established it is not relevant to every environmental topic, with many having a much lower ZoI. The individual ZOI's are set out in Table 4.2 of the **Environmental Statement [APP-040]**.

2.5.5 During statutory consultation the Applicant received further commentary on the adequacy of the cumulative effects assessment. This included a request from the host authorities that the Applicant adjusts the ZoI to include everything within 10km of the order limits, rather than 10km of the centre of the development. This was accepted by the Applicant and resulted in a change to the extent of the ZoI and the addition of further development schemes in the long list. Other schemes were also suggested for inclusion in the assessment and where relevant the Applicant has added the schemes identified by the host authorities and other consultees at that time.

2.5.6 After the statutory consultation, the Applicant continued to monitor development schemes within the ZoI to ensure that the long list, short list and assessment of cumulative effects were up to date upon submission of the DCO application. The final list and associated assessment of effects are set out in **ES Chapter 17 [APP-53]**, **ES Appendices 4.4 [APP-67] and 4.5 [APP-68]**, and **ES Figure 4-2 [APP-123]**. The sites that were ultimately shortlisted by the Applicant for cumulative assessment comprise:

a) Scheme 4: High Wood Solar Farm

b) Scheme 23: Cobholden Farm Solar Farm

c) Scheme 24: A428 Black Cat to Caxton Gibbet

d) Scheme 26: East West Rail

e) Scheme 28: Cobholden Farm BESS

2.5.7 The detailed assessment of cumulative effects between the Scheme and the shortlisted sites has been carried out in relation to Landscape and Visual

Effects, Cultural heritage and Archaeology, Ecology and Nature Conservation, Hydrology and Flood Risk, Traffic and Transport, Noise and Vibration, Air Quality, Ground Conditions.

2.5.8 Within the relevant representations received from the host authorities and statutory bodies, no concerns have been raised regarding the methodology that has been adopted for the assessment of cumulative effects, the extent of the ZoI, or the conclusions of the cumulative effects assessment as set out in **ES Chapter 17 [APP-053]**.

2.5.9 The Applicant has received a comment from Bedford Borough Council requesting certain sites are included in the assessment, which the Applicant will respond in writing to. However, the Applicant can confirm each of the sites referenced were included in the long list, with one shortlisted for more detailed assessment.

2.5.10 It is relevant to note that other relevant representations from the public and other stakeholders have commented upon the adequacy of the CEA, including commentary on other schemes that should be included in the assessment. Those comments will be addressed in the Applicant's response to the relevant representations, and added to the assessment process if appropriate.

2.5.11 As set out in **ES Chapter 17 [APP-053]** the Applicant is committed to maintaining an up-to-date cumulative assessment following submission of the DCO. It is the Applicant's intention to submit an updated long list with associated assessment and identification of any other sites for shortlisting at Deadline 1. An initial review of schemes within the ZoI has not identified any further schemes for shortlisting / detailed assessment.

2.5.12 The assessment of cumulative effects identified that the appraisal of traffic and transport effects should take account of High Wood Solar Farm, Cobholden Farm Solar Farm, Cobholden Farm BESS and A428 Black Cat to Caxton Gibbet and East West Rail.

2.5.13 As described in section 9.11 of **ES Vol 1 Chapter 9: Traffic and Transport [APP-045]**, the Cobholden Solar and BESS scheme does not share any direct sections of construction traffic access route. The only slight overlap between the two schemes is in the fact that the main access of the Cobholden site would be located on Bushmead Road approximately 300m to the west of the cable connection route of the authorised development. Based on the information provided in the planning application for the Cobholden site, the development was anticipated to be operational by the end of 2027. Due to the limited overlap between the construction phases and construction traffic access routes of the two schemes, no further assessment of the cumulative impacts of the Cobholden site was deemed necessary.

2.5.14 Construction of the A428 Black Cat to Caxton Gibbet scheme is scheduled to be completed and the road open to traffic in Spring 2027, well before construction on the application would begin.

2.5.15 East-West Rail Stage 3 between Bedford and Cambridge is still subject to government funding and approval and so has no committed status and in any event is not expected to start construction until 2030, after the Applicant's scheme is completed. That DCO application is only at the initial consultation stage, with application not due to be submitted until Spring 2027. As such there is no detailed information available for that project to include within a cumulative impact assessment. It is therefore highly unlikely that any construction activity associated with East West Rail will start until after construction of the authorised development has been completed.

2.5.16 On this basis it was deemed that only the High Wood solar farm scheme, from the initial list, would have any material cumulative traffic impacts that required detailed assessment within the ES. The High Wood Solar Farm would be constructed over 40 weeks and would be accessed from a private track located some 700m away from the A1 junction at St Neots, along the B645. It would be accessed through a track that was previously used to construct an existing solar farm. Therefore, the area of overlap between the two projects would be along a limited and largely uninhabited section of the B645 road.

2.5.17 The Applicant has included an allowance for the maximum amount of daily vehicle traffic that was forecast for the High Wood solar farm scheme along that section of the road, which is 40 two-way vehicles per day. The full detailed assessment methodology is set out in section 9.11 of the **ES Vol 1 Chapter 9: Traffic and Transport [APP-045]**.

2.5.18 Whilst the impacts of the High Wood solar farm scheme are relatively low, section 8 of the **oCTMP [APP-156]** sets out details of the Applicant's willingness to participate in a working group with the developer and any other developers that may come forward subsequently. Through such a group it may be possible, for example, to program non-coincidental working or delivery patterns or abnormal indivisible load movements that help mitigate and minimise the impact on the local community.

2.5.19 The Applicant is currently carrying out some work to address the comments made recently by National Highways, specifically to assess the expected capacity performance of the A1 junction with the B645 at the peak of the construction period. This assessment will include an allowance for the maximum forecast traffic from the High Wood Solar Farm scheme.

2.5.20 The Applicant notes that interested parties have mentioned other schemes in the region including Luton Airport, Tempsford New Town and Universal Studios. However, those schemes fall outside of the ZoI of the Scheme and have not been counted.

2.5.21 Further information can be found at Hearing Action Point 17 below.

HAP No.	Action Point	Applicant's Response
17	Applicant to maintain an up-to-date list of developments to be considered within the 10km Zone of Influence for the Scheme.	The Applicant is maintaining an up-to-date list of sites within the 10km ZoI for the assessment of potentially significant cumulative effects from the Scheme and other proposed developments. The long list and associated long list plan have been updated and form part of the Applicant's Deadline 1 submission. It has not been necessary for the

HAP No.	Action Point	Applicant's Response
		Applicant to update the short list or the cumulative effects assessment provided in **ES Vol 1 Chapter 17 [APP-053]** on the basis that none of the schemes that have been added to the long list are considered to have the potential to give rise to significant cumulative effects with the Scheme.

Question from ExA asking whether section 9.11 of Chapter 9 [APP-045] assesses a worst-case scenario for cumulative Schemes

2.5.22 The Applicant confirmed this is correct. The High Wood scheme was the only one that made it through the cumulative effects filtering process. The peak traffic associated with that Scheme is 40 two-way movements per day and is what has been assumed for the basis of the cumulative assessment.

Comments from Mr Stapleton on behalf of Bedford Borough Council in relation to the outline construction traffic management plan and strengthening the obligation to implement a working group.

2.5.23 Please see the Applicant's response to Hearing Action Point 18 below.

HAP No.	Action Point	Applicant's Response
18	Applicant to consider strengthening the commitment to construction traffic management plan working group.	The Applicant has updated the **oCTMP [as submitted at Deadline 1]** to strengthen the commitment to a construction traffic management plan working group.

Comments from Mr Lacey on cumulative traffic impacts from other developments including Universal Studios Theme Park, East West Rail, the new town at Tempsford and Dennybrook and comments on whether the 10km ZoI is sufficient

2.5.24 The Applicant confirmed that ZoI has been set to be a proportionate assessment of the requirements and it was agreed with all relevant bodies. It is there to assess the cumulative effects of this Scheme where this Scheme cumulatively with others generates significant environmental effects.

2.5.25 In respect of Universal Studios, the Order limits for the Scheme aren't included within their cumulative assessment and they are not proposing to use any of the roads used by the Scheme.

2.5.26 In respect of Tempsford New Town, it is correct that this is one of 12 new towns proposed in the UK. However, it is not a firm proposal at this stage and it is intended that the development will go to consultation along with the other 11 new towns in April 2026 where a decision will be made on which towns are to be taken forward. Once Tempsford New Town becomes committed and there is information available to the Applicant to assess the in-combination effects the site will be included in the Applicant's in-combination effects assessment.

2.5.27 In respect of East West Rail, Phase 3 is not committed yet and based on the information published by East West Rail. The phase (which covers development from Bedford to Tempsford and the new Tempsford station) will not start construction until 2030, which is when construction of the Scheme will be concluded. Moreover, Tempsford New Town is predicated on the rail link for East West Rail being constructed, which won't start until 2030 even if it is funded by the government.

2.5.28 Luton airport was also referenced in relevant representations but is also 30km away and was also excluded from the cumulative assessment for the Universal Studios scheme on the basis that it was too far away.

Request from the ExA that the Applicant considers the availability of worker accommodation in light of the other developments, including resident concerns around workers living in vehicles

2.5.29 Please see the Applicant's response to Hearing Action Point 19 below.

HAP No.	Action Point	Applicant's Response
19	Applicant to consider cumulative impacts of other projects relating to socio economic matters (including availability of worker accommodation and concern of construction workers living in vehicles).	The principal concern at the hearing was in connection with the potential for significant cumulative socio-economic effects (and other consequential effects) to occur during the construction phase of the Scheme which is due to take place at the same time as construction of the Universal Studio's theme park development, proposed to the south of Bedford. Whilst it was confirmed by the Applicant's representatives during ISH2 that the Universal Studio's scheme was around 7km beyond the ZoI that had been agreed for the assessment of significant cumulative effects from the Scheme and thus outside the area where potential significant cumulative effects would occur, it was noted that there was overlap in the consideration of available workers accommodation for the Scheme and the labour and accommodation areas for the Universal Studios Scheme. The Applicant agreed to provide further consideration to the potential for significant cumulative effects on worker accommodation, which is set out below. As noted by the Applicant during ISH2, the Universal Studio's development already benefits from a Special Development Order (SDO) consent from the Government. The documentation submitted in support of the application included assessment of both individual and of cumulative effects arising from the scheme, including assessment of available construction worker accommodation. This is presented within the following

HAP No.	Action Point	Applicant's Response
		documents submitted in support of that application. • ES Chapter 13 – Socio-Economics (with associated figures / appendices) • ES Chapter 18 - Cumulative Effects (with associated figures / appendices) These documents have been used to determine whether significant cumulative effects could occur regarding the adequacy of availability construction worker accommodation. The Study Area for the assessment of labour force requirements and availability of worker accommodation are set out within Chapters 13 and 18 of the Universal Studio's ES and were based upon the following areas: • **Local Area:** Lower layer super output areas (LSOAs) that intersect with a 500m boundary around the Site. • **Sub Regional Context Area (SRCA):** The local authority boundaries of Bedford, Central Bedfordshire, Milton Keynes and Luton. • **Labour Catchment Area (LCA):** Defined as a 60-minute travel time by car or public transport to the Site. It is assumed that workers would commute from within this distance. Detailed consideration of the cumulative effects of the Universal Studio's scheme is provided in the appendices to Chapter 13 of their ES. This considers the cumulative labour force and temporary accommodation requirement of the Universal Studio's scheme in combination with Phase 2 of East West Rail (EWR) and the expansion of Luton Airport. In terms of the cumulative effect on worker accommodation, it draws the following conclusions. "*Whilst the cumulative demand for the construction workforce is taken into consideration when assessing current*

HAP No.	Action Point	Applicant's Response
		and future schemes that coincide with the peak construction period of the Proposed Development, the temporary accommodation needs of these scheme's are not explicitly factored into the study areas temporary accommodation assessment. It is assumed that the smaller cumulative schemes will not place any significant demand on temporary accommodation, and that larger cumulative schemes will produce their own detailed construction strategies, as required, to mitigate their own such impacts. These are not available at the time of writing, and so any proposed mitigation is also unknown." Whilst the Universal Studio's documentation doesn't provide any quantitative assessment of the cumulative effects (noting it was nevertheless granted an SDO), looking at the matter proportionately and objectively, it is perhaps not necessary to do so. The Luton Airport, Universal Studio's and EWR schemes all have 60-minute catchments for construction worker availability. Whilst there is some overlap between each of the catchment areas there will be different accommodation available for workers required on each scheme, for example the catchment for Luton Airport would take in Watford, Amersham and a number of the North London Boroughs (Harrow, Barnet, Enfield), which would not be included in the catchment for EWR and Universal Studio's. Similarly, the catchment for the East Park Scheme would include for example northern Peterborough and Stamford. This is in addition to the areas of overlap between all or at least 3 of the Schemes, which includes (but is not limited to) St Albans, Bedford, Milton Keynes, Luton, Dunstable, Leighton Buzzard, Stevenage Cambridge, Northampton, Huntingdon, Wellingborough, Corby, Buckingham, Aylesbury and Kettering. Given the sheer number of major settlements either individually or collectively covered by the 60 minute labour catchment for these major

HAP No.	Action Point	Applicant's Response
		development schemes, it is patently clear that there would be enough accommodation for those workers that need it, in addition to a large resident workforce that could travel to the sites from their own properties. Thus, significant cumulative effects on the availability of worker accommodation as a result of Universal Studio's and the other nationally significant projects is highly unlikely.

Comments from Mrs Stokes on further action points

2.5.30 Please see the Applicant's response to Hearing Action Point 20 below.

HAP No.	Action Point	Applicant's Response
20	Applicant to consider the following matters raised by Mrs Stokes: • Consider issue about school times and commuting times and including this within the DCO; • Maintain an up-to-date list of items to be considered under the 10km zone of influence for the Scheme; • Replace "could" with "will" in the commitment to implementing a construction traffic working group in the CTMP; and • Add Tempsford New Town when it becomes committed	The first three points raised during the hearing have already been covered in the Applicants response to other action points arising from the Hearing, specifically: • Point 1 has been addressed in the Applicant's response to Mr Pike's comments. • Point 2 has been addressed in the Applicant's response to action point 14; and • Point 3 has been addressed in the Applicant's response to action point 11. However, there has been an update on the status of the Tempsford New Town scheme after the hearing closed. Following the recommendations made by the New Towns Taskforce in September 2025, which recommended 12 potential locations for the development of new town schemes, on the 23rd March the Government announced its intention to bring forward 7 of the proposed new town

HAP No.	Action Point	Applicant's Response
		locations forward for further consideration. This includes the Tempsford New Town Scheme which is intended to deliver up to 40,000 new homes around a new East West Rail station. In making its announcement the Government has explicitly stated that all 7 locations are to be the subject of public consultation, which is expected to close on Monday 18 May 2026 and that a final decision on the locations for new towns will be confirmed later in 2026, taking into consideration responses received to the pubic consultation, a Strategic Environmental Assessment, and any additional environmental assessment required in connection with each location. Accordingly, there is still no certainty that the Tempsford New Town scheme will ultimately come forward and, as such, it can't be considered a firm commitment for inclusion in the assessment of cumulative environmental effects. The Applicant will continue to monitor the Government's new town selection process with the intention of assessing the potentially significant cumulative effects of the Tempsford New Town if / when it becomes a firm commitment. With the above in mind, it is also relevant to note at this stage that whilst it is the Government's ambition to have commenced development of three new towns before the end of the current parliament in 2029. Based upon published information, that is unlikely to include the Tempsford New Town proposal. This is on the basis that development of the new town is predicated on the successful delivery of the new Tempsford Railway Station as part of the East West Rail development. The current information on the East West Rail web page is that construction of Phase 3 of the EWR development, which includes the Tempsford station is not currently programmed to progress until after 2030, which is after the East Park Energy Scheme is complete. Thus, even if the Tempsford New Town is

HAP No.	Action Point	Applicant's Response
		progressed it does not have the potential to give rise to significant cumulative effects for the Scheme. Accordingly, the scheme should be a consideration in the assessment of effects arising from the new town scheme.

APPENDIX A: LIST OF ACTION POINTS

The following Hearing Action Points were taken by the Applicant at ISH2. The Applicant's responses to each point are set out in the relevant tables in Section 2 of this document. Hearing Action Point 3 was not for the Applicant.

HAP No.	Action Point
1	Applicant to respond in writing to points raised by Mr Pike on BMV and soil quality. In terms of BMV, Mr Pike invited the ExA to seek clarification from the Applicant on the following: 1. whether the applicant can identify any specific areas of predominantly lower grade agricultural land within technically feasible connection distance that were examined and rejected together with the reasons for their exclusion; 2. what analysis demonstrates that inclusion of extensive BMV land is no more than reasonably necessary in circumstances where lower quality land may not have been voluntary available, but compulsory acquisition powers could have put that within the land assembly; and 3. what documentary evidence demonstrates how agricultural land quality was weighed against other site selection factors in concluding that this location represents the least harmful, practical option. In terms of soil quality, Mr Pike invited the ExA to seek clarification from the Applicant on the following: 1. whether all piled foundations, underground cables and various structures will be removed in full at decommissioning; 2. if any elements are to remain, what assessment has been undertaken of their implications for future agricultural use and soil function; 3. what evidence demonstrates that soil structure and fertility will be maintained at a level consistent with current productivity over the full operational period; 4. how will soil quality be monitored and what mechanisms will trigger remedial action if degradation occurs; and 5. how will the success of soil reinstatement be verified both after construction and decommissioning.
2	Applicant to clarify wider impact of scheme on regional and national supply of BMV.
3	*Mr Lacey to share Derrick Wilkinson report relating to food security.*
4	Applicant to follow up with additional detail of analysis relating to solar farms and food security.
5	Applicant to respond in writing to clarify solar roadmap figures for land use.

HAP No.	Action Point
6	Applicant to confirm in writing who would be included in community liaison group and how individuals would be included in the group (as set out in section 3.2 of oCTMP)
7	Applicant's junction capacity modelling to be carried out at the junction of the B645 and the A1 to include sensitivity test on the basis of a car occupancy ratio of 1.4.
8	Applicant to share Proposed Construction Access Strategy plan with local highways authorities.
9	Applicant to respond in writing to points raised by Mr Stapleton (on behalf of the Host Authorities): 1. Mr Stapleton suggested that ANPR and cameras could be used to ensure vehicles are entering and departing the site using the correct access point. 2. Mr Stapleton suggested a strong set of management measures will be needed to ensure reporting of non-compliance, actions and remedial measures. 3. Mr Stapleton stated that accesses should be in line with DMRB, and management measures will be required where visibility splays are shorter than DMRB. 4. Mr Stapleton stated that BBC have some comments on the tangent of visibility splays to the radius of the bend where access points are on the outside of the bend. 5. Mr Stapleton requested details of management measures for haul roads that are too narrow for two HGVs to pass (holding areas, passing places, marshals or other management measures).
10	Applicant to check and confirm in writing extent of any hedgerows impacted by visibility splays and management measures.
11	Applicant to respond in writing to points raised by Mr Tuttle: 1. Mr Tuttle suggested geofencing as a potential method for monitoring vehicles. 2. Mr Tuttle suggested a "one strike and you're out" procedure for non-compliance with routing.
12	Applicant to provide traffic figures for replacement activities.
13	Applicant to respond in writing to Councillor Sira on construction traffic and traffic management Councillor Sira raised the following questions in relation to construction traffic: • what independent assessment has been undertaken on the structural capacity and current condition of the local road network • what specific mitigation measures are proposed to prevent road damage, not just manage traffic flow;

HAP No.	Action Point
	• whether the applicant will commit to pre-construction road condition surveys and full remediation of any damage caused, secured through an enforceable agreement; and • how will this be monitored and enforced over the duration of the construction period. Councillor Sira raised the following questions in relation to traffic management: • who is responsible for ensuring compliance on a day to day basis; • what mechanisms are in place to identify and respond to breaches in real time; • what robust and enforceable mechanisms will be in place to monitor compliance with traffic management measures on a continuous basis; • who will be responsible for enforcement of these measures; • what powers or controls will they have to intervene if measures are not adhered to; • what remedial actions will be triggered if traffic limits are exceeded, routes are not followed, or disruption exceeds assessed levels. Councillor Sira raised the following questions in respect of cumulative effects: • what active liaison has taken place with East West rail and the Black Cat project teams in developing traffic management plans; • is there a shared or coordinated traffic management framework to ensure that multiple schemes do not operate in conflict with one another.
14	Applicant to respond in writing to Mr Pike in relation to construction traffic and traffic management matters: Mr Pike raised the following questions in relation to construction traffic: 1. whether the Applicant has driven the route down the B645 noting the condition of the local route network and suitability for HGVs; 2. how the Applicant proposes to construct access SA16, where there is currently a drainage ditch abutting the road barrier, and has the Applicant considered how long it will take to build; 3. how much traffic will be put through Great Staughton and the surrounding network before internal construction roads are built; 4. whether the construction routes relied upon in the environmental statement will be secured through binding requirements in the development consent order, including explicit prohibition, prohibitions on alternative routes and enforceable obligations on all contractors and subcontractors; 5. what safeguards would prevent diversion through nearby villages not assessed within the baseline if congestion or disruption occurs on the primary corridor, and what enforcement mechanisms would apply if such diversion nevertheless occurs; and 6. why does the draft development consent order not include an explicit no through routing schedule for sensitive settlements if avoidance of those areas

HAP No.	Action Point
	forms part of the assessed mitigation and the material component of the impact assessment. 7. Mr Pike also queried whether the applicant will commit to enforceable restrictions on construction traffic during school travel periods and peak commuter hours on the face of the draft DCO, and if not, what evidence demonstrates that such protections, protections are unnecessary in this location.
15	Applicant to prepare and submit fly through footage of construction routes.
16	Applicant to update accident data by the end of the examination.
17	Applicant to maintain an up-to-date list of developments to be considered within the 10km Zone of Influence for the Scheme.
18	Applicant to consider strengthening the commitment to construction traffic management plan working group.
19	Applicant to consider cumulative impacts of other projects relating to socio economic matters (including availability of worker accommodation and concern of construction workers living in vehicles).
20	Applicant to consider the following matters raised by Mrs Stokes: • Consider issue about school times and commuting times and including this within the DCO; • Maintain an up-to-date list of items to be considered under the 10km zone of influence for the Scheme; • Replace “could” with “will” in the commitment to implementing a construction traffic working group in the CTMP; and • Add Tempsford New Town when it becomes committed