

Comments on the Applicant's D1 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCC**) on the Applicant's Deadline 1 (**D1**) submissions. The table below provides the relevant paragraph or other references used in the submissions.

Except where expressly stated otherwise below, the Council reiterates and relies on the comments submitted to the ExA at previous deadlines.

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Applicant's Response to Relevant Representations [REP1-055]

Topic	Paragraph Number	Council's Comments
Ecology and Biodiversity	CCC-RR-10 to 18	<p>The general responses are welcomed and noted, however, we request the applicant refer to the Council's Local Impact Report [REP1-075] which provides details of the specific elements of ecological impact assessment for which we have concerns.</p> <p>The Council notes that some documents have been revised to address some points and submitted at Deadline 1 – our comments are provided individually to each document below.</p>
Ecology and Biodiversity – Great Crested Newt	CCC-RR-12	<p>The Council awaits the submission of the draft licence application information / letter of no impediment to the examination.</p> <p>It will be important to clearly set out the areas on-site that will be allocated for protected species licences to help inform the biodiversity net gain assessment. If traditional licences are to be obtained, it will be important to understand how this can be achieved without access to off-site ponds for which there will be impacts to great crested newt terrestrial habitats within 250m of the pond. And why these have not been surveyed to inform the draft licence / planning application. We recommend the Great Crested Newt report is updated to encompass these elements.</p> <p>The Council has provided comments to the updated Great Crested Newt Survey Report [REP1-027] below.</p>
Ecology and Biodiversity – Farmland Bird Mitigation Strategy	CCC-RR-13	<p>The outline Farmland Bird Mitigation Strategy is considered inadequate – please see the Council's comments to the updated Outline Landscape and Ecological Management Plan [REP1-041] below.</p>
Ecology and Biodiversity – Biodiversity Net Gain (watercourse)	CCC-RR-14	<p>Clarification regarding how the enhancements to the tributary of the River Kym have been calculated is welcomed. We recommend this clarification is also provided within the Biodiversity Net Gain report.</p>

		Please see detailed comments in the Council's Local Impact Report [REP1-075] and the Council's comments relating to the revised Biodiversity Net Gain Report [REP1-053] below.
		<p>The Council is disappointed that the applicant has failed to maximise opportunities to deliver watercourse restoration.</p> <p>We refer the applicant and examiner to paragraph 4.7.6 of National Policy Statement for Energy (EN-1) 2025 which states that "<i>Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.</i>" We consider the applicant has failed to adequately incorporate enhancement to watercourses within this scheme, namely the omission of in-channel improvements to watercourses (tributary to the River Kym).</p> <p>The Council seeks an update to the Outline Landscape and Ecological Management Plan [REP1-041] to include a commitment to investigating opportunities to provide in-channel improvements to watercourses, including tributary to the River Kym as part of detailed LEMP.</p>
Ecology and Biodiversity – Biodiversity Net Gain	CCC-RR-17	The Council welcomes the commitment to engage with host authorities regarding a post-consent planning performance agreement or other funding mechanism to deliver the steering group. The Council considers funding commitment is best secured within a Section 106 agreement for the relevant host authorities.
Traffic and transport	CCC-RR-35	The council notes that updated drawings have been provided within the outline Construction Traffic Management Plan (oCTMP) but as part of the review some amendments are requested in relation to accesses SA14, SA15 and SA16 as well as dimensions for the Spring Hill junction within Cambridgeshire's area. Please see below comments on the oCTMP.
Traffic and transport	CCC-RR-48,	The Applicant refers to Figure 3 at Appendix A of the outline Landscape and Ecological management Plan (oLEMP). The first figure 3 shows permissive access in Bedford Borough and not Cambridgeshire. There is a second figure 3 (which the council queries whether this should be labelled figure 4) which shows permissive access in Cambridgeshire. The council requests that the applicant corrects the Figure references.

Traffic and transport	CCC-RR-48, 50,51, 58,	The permissive route shown is only a footpath and approximately 2km long. Given the larger extent of the broad species grassland here, the permissive access should be extended both to the northwest and southeast. Extending permissive access to the southeast would enable connection with the public highway, enabling permissive bridleways to be provided instead of a permissive footpath. These would still be unsurfaced, as proposed for the permissive footpath. Interpretative boards are welcomed.
Traffic and transport	CCC-RR-49,	The council understands that the Applicant is restricted in where new access can be provided. However, in order to show commitment to providing wider benefits to Public Rights of Way (PROW) users, funding improvements could be made to pre-existing PROW infrastructure.
Hydrology and Flood Risk	CCC-RR-20, 21	<p>The council acknowledges that full detail will be provided at the detailed design stage; however, a sufficient level of information is still required at this stage. While the applicant's response is acknowledged, we wish to reiterate that the requested information relates to the Outline Surface Water Management Plan for the Battery Energy Storage System (BESS) compound.</p> <p>Paragraph 6.4 states that estimated storage volumes for the BESS compound and access track have been calculated using the hydraulic modelling software Causeway Flow. It therefore remains unclear why these hydraulic calculations have not been provided for review. Section 6.4.2 states that the modelling is based on the 1% AEP storm event with a 25% climate change allowance. Given the expected lifetime of the development, the design must incorporate a 40% climate change allowance.</p> <p>The council acknowledges the calculations provided in relation to the greenfield runoff rates. The current volume estimates, which are only based on the 1 in 100 year + 25% climate change indicate that the total volume required is 2,096m³. Although the proposed use of a detention basin and swale is supported in principle, the indicative drainage plan does not clearly demonstrate that the required storage volumes can be accommodated within the Order Limits while meeting key design standards set out in the Construction Industry Research and Information Association (CIRIA) Sustainable Drainage Systems (SuDS) Manual, including freeboard, side slopes and maximum water depths etc.</p>

		Without the hydraulic calculations, the council is unable to determine whether the parameters used to calculate the required attenuation volumes are appropriate. These design principles must be demonstrated and agreed at this stage and then carried through to the detailed design stages. In the absence of this information, the Lead Local Flood Authority (LLFA) are unable to support the proposals.
Hydrology and Flood Risk	CCC-RR-23	Whilst the council accepts the applicant's desire to remove possible delays and have certainty of the outcome of their consents, as LLFA we still maintain the importance of this. This is an important safeguard to ensure that flood risk is not inadvertently increased through default consent arising from resourcing constraints rather than technical acceptability. There is currently nothing to prevent the applicant from submitting a large volume (or even all) of their consent applications simultaneously, which could exceed the LLFA's capacity to assess them within the statutory timeframe. This scenario has occurred on previous Development Consent Order (DCO) projects and presents a material risk to effective flood risk management. A deemed refusal approach ensures that consent is only granted following proper technical scrutiny and provides an appropriate incentive for early engagement and realistic programming. As a potential compromise, the LLFA would be willing to consider mechanisms to secure the phased submission of land drainage consent applications, aligned with construction phasing and agreed timescales, provided this is set out clearly within the DCO.
Cultural Heritage and Archaeology	CCC-RR-02	The council is of the view that the details provided are appropriate. The council welcomes that Historic England and the council will have sign off over the exact final location of the track via the proposed archaeological mitigation strategy, and that the location will follow further archaeological investigation.
Cultural Heritage and Archaeology	CCC-RR-04	The assessment of effects in Table 6.14 of the Environmental Statement will still be lacking some accuracy if edits based on the final Site D report are not made, but the council is content that the applicant has provided a satisfactory response to our comment, and that the Archaeological Mitigation Strategy will provide updated details via Requirement 15(4).
Cultural Heritage and Archaeology	CCC-RR-03, 05-09	The council is satisfied with the Applicant's remaining responses regarding Cultural Heritage and Archaeology.

Socio Economic	CCC-RR-63	<p>The Community Benefit Fund (also referred to as East Park Legacy Fund) is much welcomed for resourcing future community enhancements, should the scheme proceed, led/driven by the very community affected by its implementation. Whilst the council notes that the sum committed to this fund by the applicant (£6.4million or £400/MW/year) has increased from that proposed earlier in the consultation process, it continues to remain below the £500/MW/year as advocated by other local authorities that host comparable large scale solar projects. The Applicant points out that their offer is made without claiming any planning benefit, but it is important to note this is something the government consulted on last year to mandate for low carbon energy infrastructure. Therefore, we continue to seek a further increase in the fund to ensure it is commensurate with that provided by similar energy schemes elsewhere in England/the UK.</p>
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Revised Construction Traffic Management Plan [REP1-035]

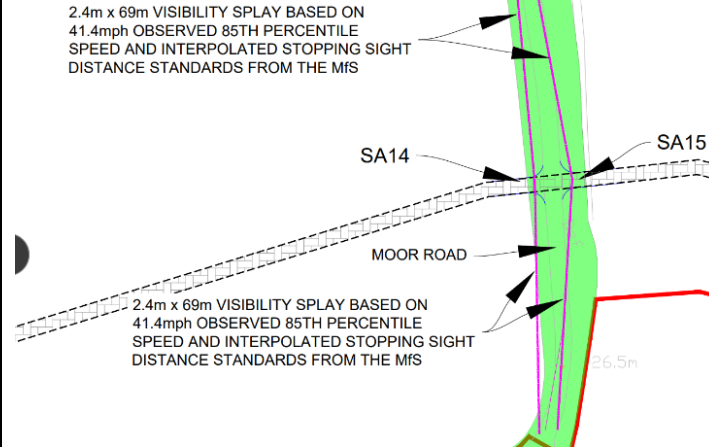
Topic	Paragraph Number	Council's Comments
Introduction	1.1.5	<p>It is indicated to keep the construction traffic movements to a minimum during peak network periods to reduce the impact on the highway network – the council is of the view that this should be a requirement wherever possible.</p>
	1.1.6	<p>Final Construction Traffic Management Plan (CTMP) will be prepared in consultation with the Local Highway Authority (LHA) to ensure that what is proposed is acceptable.</p>
		<p>Contractor and visitor parking is proposed within the site and parking will take place remote from the public highway 350 spaces within the main site compound and 50 vehicles spaces at site A, B and C - these will need to be clearly indicated within the finalised CTMP</p>
Collection / Drop-off Service	4.5.6	<p>It is recommended that this para is revised to give more certainty collection and drop off services will be provided.</p>

Sustainable Travel Strategy	4.5.3	The detailed Construction Workers Travel Plan will be assessed by the council's Transport Assessment Team.
Construction access strategy	5.1	<p>It is indicated that the construction traffic accessing the site from the highway network would do so by use of the A1 and the B645 - the highest classification of road in the vicinity of the project. The council is of the view that this is suitable to cater for vehicles associated with the scheme.</p> <p>We note in the Construction Traffic Management Plan [REP-], paragraph 5.1.1 the applicant has outlined HGVs will be directed to access the B645 from the A1 using the northbound exit slip, and to access the A1 using the northbound entry slip when departing the Site to minimise the impact of construction traffic for the residential area of Eaton Ford. The council welcomes this addition.</p>
	5.1.7	The main site access (SA16) would see all movements, with larger loads to smaller compounds using mostly internal roads to the satellite locations. It is described as 'likely that a number of deliveries would be unloaded within the main site compound in Site D and would then be transferred on to the satellite compounds by smaller vehicles. The council requests that the Applicant quantifies the number and route that these movements will use, ensuring they do not go through Great Staughton.
	5.1.8	It is indicated that the majority of daily staff movements will arrive at site D, although a small number of daily staff movements would access sites A and B without passing through the main site access. The council requests that the Applicant quantifies the number and route that these movements will use, ensuring they do not go through Great Staughton.
	5.1.10.	Site C access will be taken from an existing Heavy Goods Vehicle (HGV) access (SA12) where vehicles will follow the existing public highway to access site B. No details of two-way tracking have been provided in relation to the suitability of this route for the largest construction vehicles to pass each other. The council requests that this is provided.
	5.1.13	Minor Road widening works are required along Spring Hill Road between Great Staughton Road and access SA10 during the construction phase. The same should be required along

		Great Staughton Road to facilitate two-way movements of the largest vehicle for access to Spring Hill Road and access SA12 - the council requests that details of this tracking are submitted.
Standard Access Designs and Types	5.2.4	The existing bell-mouth access SA13 is indicated to be used through the operational phase of the scheme – the council requests that the applicant provides details of proposed use to ensure it is no greater than that which use it at present. Whilst splays have been indicated there are no corresponding speed surveys to show its acceptable for any intensification.
	5.2.8	Car share scheme and guaranteed ride home is acknowledged and welcomed.
	5.2.10 and 5.29	The use of minibuses to travel from site to site is welcomed as is the proposed use of minibuses to transport workers to the site from designated pick up / drop off points. Further details will be required in subsequent submissions.
Temporary Construction Access	5.3	Temporary construction access designed in accordance with Design Manual for Roads and Bridges (DMRB) criteria which is in accordance with the speed of the road is acceptable.
General Construction Traffic Management/Mitigation	5.5.1	Traffic regulation measures are proposed at accesses/ Road crossing SA14 and SA15 because the visibility splays achievable are not conducive with the measured speeds of vehicles provided and therefore will require a temporary traffic regulation order to 30mph and or traffic management to facilitate access/egress.
Access Road Signage	5.7	Access Road Signage proposed to provide construction vehicles directions to appropriate access. Signage should also indicate where construction vehicles are not permitted, such as 'no construction vehicles past this point' etc.
Highways Condition Survey	5.8	A pre and post condition survey is proposed on public highways which are to be used by construction vehicles, however details of any issues during construction which are highlighted by the LHA or members of the public should also be addressed indicating proposed timescales of any repairs, should damage become evident because of construction vehicle activity.

Delivery Management System	6.1.2	Deliveries are indicated to be programmed and planned in advance with a booking system and delivery time slot, and to avoid peak-time traffic. This is acceptable to the council.
	6.1.8	For deliveries of materials restricted to vehicles that can enter and leave in forward gear, dedicated turning areas should be located close to all access points.
Vehicle wheel washing facilities	7.1.1	it is proposed that debris will be prevented from being taken onto the highway by means of appropriate wheel wash facilities, these have been indicated as either jet washers or wheel wash rumble strips with any residual dust and dirt being removed by brushes and vacuum road sweepers. Wheelwash facilities should be sufficient to prevent mud etc being transferred from site onto the highway. However, the council would support sweepers if needed as a last resort, as the applicant should ensure the wheelwash facilities are sufficient and effective. The method of keeping the highway clean should be reviewed monthly so as further methods may be employed if the initial methods fail to prevent residual dust and dirt on the highway.
	7.1.1	Each access should have a non-granular surface for a reasonable distance from the road edge where, if required, cleaning stations may be located.
Access drawing comments.	SA14 and SA15 Construction only accesses / crossing point	Visibility requirement has not been met as indicated before, the recorded speeds are above those required to assess by Manual for Streets requirements i.e. above 37mph. It is noted, however, that the speed surveys were carried out remote from the location of this crossing. Therefore, either further speed surveys will be required, or temporary traffic regulation orders would be required to reduce the speeds of vehicles with appropriate warning signage.

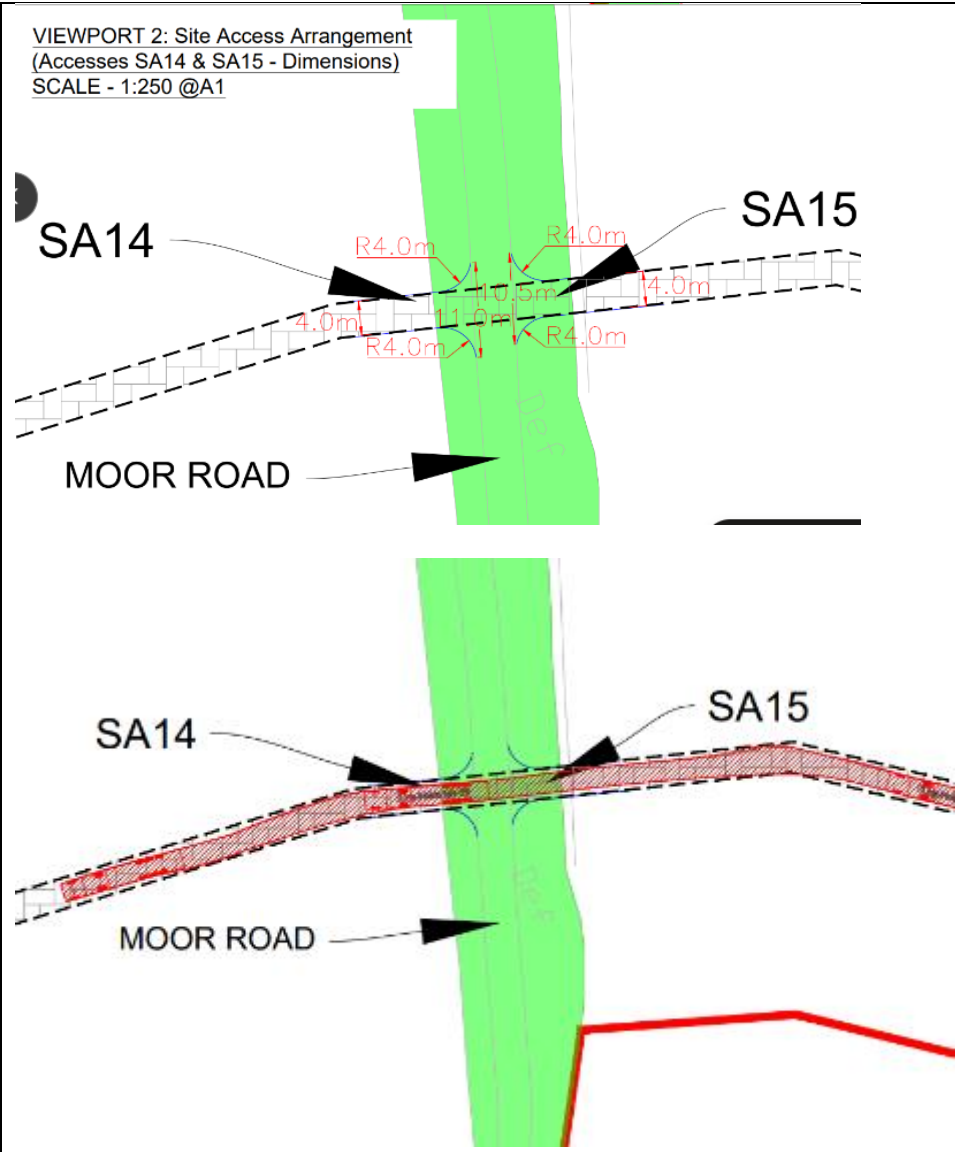
**VIEWPORT 1: Site Access Arrangement
(Accesses SA14 & SA15 - Visibility Splays)**

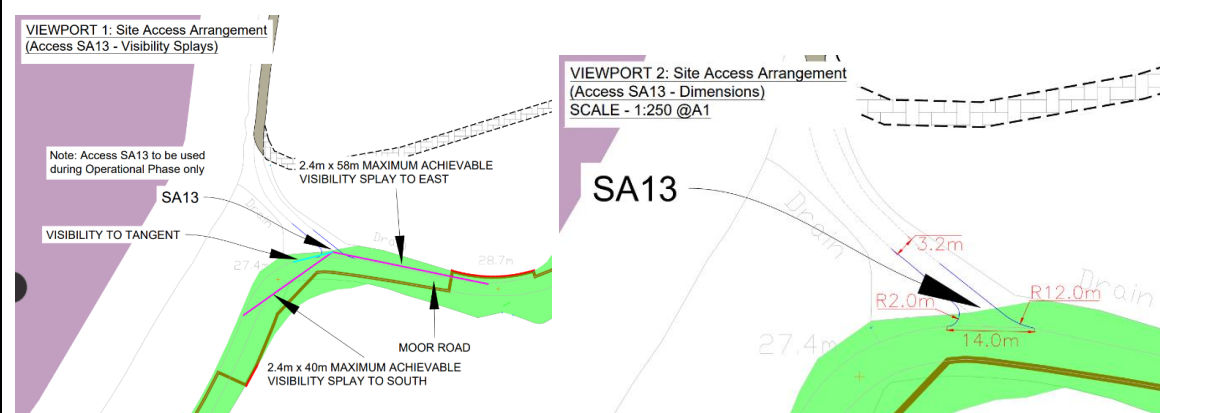


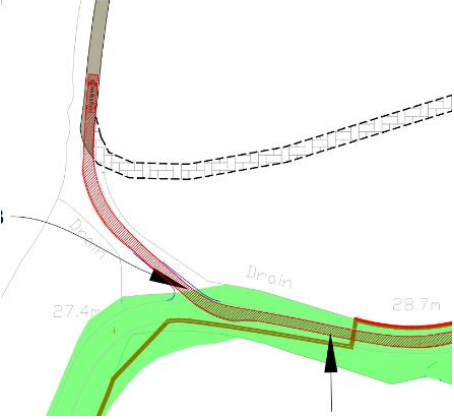
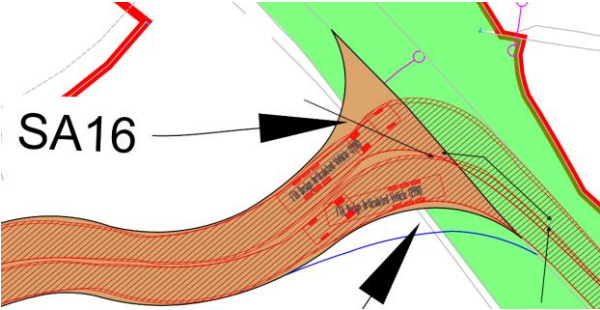
With regards to the access width, it is noted that two vehicles are unable to pass at the location of the crossing with a 4m width. The crossing should be of sufficient width to allow two-way simultaneous movements at locations adjacent to the highway. While it is indicated within the CTMP that vehicles will be controlled so that none should meet, this safeguard should be built in as standard to mitigate for such instances.

A width of 7.3m for a distance of 20m from the road edge should be sufficient.

VIEWPORT 2: Site Access Arrangement
(Accesses SA14 & SA15 - Dimensions)
SCALE - 1:250 @A1



		<p>The council queries why 4m radii have been applied to the design. As no vehicles are proposed to use Moore Road, the inclusion of these would only seem to allow manoeuvres. The council requests that the applicant removes these to ensure straight across movements only. Moore Road has limited width to accommodate construction traffic for the project.</p>
	<p>SA13 operational access</p>	<p>Whilst this is an existing access, the council has not seen any information relating to the existing use and or proposed use, so requests clarity on whether there will be additional volume.</p> <p>The proposed splays are also indicated but no speed measurements have been undertaken in this location to ascertain if they are adequate.</p> <p>The tracking has been undertaken with a 10m rigid vehicle – the council requests clarity as to whether this is the largest vehicle likely to use the access, with details provided of the frequency to ensure the single width nature is acceptable.</p> <p>The council also notes that it is not a balanced junction regarding radii, and requests further information as to whether any vehicles using the access will only enter and leave from the North.</p> 

		
	<p>SA16 Main construction access</p>	<p>In the tracking plan provided, the vehicles appear to clash when manoeuvring in the location below. The council requests that the applicant provides tracking or alters the geometry so that this does not occur.</p> 
	<p>SA12 Zantra access</p>	<p>The council notes that this access has already got approval for HGV use and there is no damage evident on Google Earth.</p>

	<p>Springhill junction widening, Figure 7</p>	<p>Figure 7 Rev P01 – this area is within the council’s jurisdiction. No dimensions have been indicated at the junction for Radii or widths etc. Can these be added.</p> <p>Between Great Staughton Road and Spring Hill two-way tracking must be provided, including accurate road widths.</p>

Monitoring and Compliance	9.13	The council is of the view that it is unclear why Automatic Number Plate Recognition (ANPR) or Geofencing would be considered unfeasible. Similar schemes have been proposed as part of the Cambridge Waste Water Treatment Plant Relocation Project DCO to the north-east of Cambridge without any perceived issues.
	Appendix B	The council suggests that it would be unlikely to see workers walking or cycling to the site given the nature of the site location, in that it is rural with low quality cycle/walking facilities. Concentration should therefore be on Car Sharing and Staff Buses.

Traffic Regulations Measures Plan [REP1-004]

Topic	Paragraph Number	Council's Comments
Traffic Regulations Measures	-	The council notes and welcomes the update to remove the lifting of weight restriction along the B645.

Draft Development Consent Order [REP1-006]

Topic	Paragraph Number	Council's Comments
		The council, alongside the other host authorities are in continued discussion with the applicant relating to the DCO. This has included meetings and exchange of notes. We anticipate future versions of the DCO will include changes to reflect these discussions.

ES Vol 1 Chapter 8: Hydrology and Flood Risk [REP1-010]

Topic	Paragraph Number	Council's Comments
Flood Risk and Hydrology		In its capacity as the Lead Local Flood Authority the council has no further comments on this matter. However, as it relates to ecology please see comments below.
Ecology	Table 8.7 - High sensitivity Ecological Criteria, page 8-44	'High sensitivity' for ecological receptors should also include irreplaceable habitat (e.g. ancient woodland & veteran trees, which are of national importance).
Ecology	Major magnitude - Ecological Criteria, Table 8.8, p8-49	<p>The council considers that this does not adequately consider the ecological receptors that could meet the "<i>long-term impact of more than district importance or in breach of recognised standards, policy or legislation</i>" criteria for 'major' magnitude impacts (set out at paragraph 8.5.7). Currently, it infers consideration has only been given to loss / significant impact to European Sites and protected species. The council therefore requests this is expanded to also include County Wildlife Sites (sites of county importance); Sites of Special Scientific Interest (nationally important / statutory protection) and ancient woodland and veteran trees (irreplaceable habitat and set out in National Planning Policy Framework (NPPF / Biodiversity Net Gain (BNG) legislation).</p> <p>In light of the above, the council seeks that Huntingdon Wood County Wildlife Site / Ancient Wood (site of county importance and an irreplaceable habitat) is considered within the hydrological assessment.</p>

Ecology	Moderate magnitude - Ecological Criteria, Table 8.8, p8-49	<p>'Moderate' magnitude should consider "<i>long-term impact of more than local importance</i>" (see criterial set out at paragraph 8.5.7) and therefore, should also include reduction in biodiversity value of Sites of Special Scientific Interest (nationally important / statutory protection) and ancient woodland and veteran trees (irreplaceable habitat and set out in NPPF / BNG legislation).</p> <p>In light of the above, the council seeks that Huntingdon Wood County Wildlife Site / Ancient Wood (site of county importance and an irreplaceable habitat) is considered within the hydrological assessment.</p>
Land-use and designations	8.6.14 - 8.6.16	This section does not consider impact to non-statutory designated sites, ancient woodland, or irreplaceable habitat. As explained above, the council requests that the assessment includes Huntingdon Wood County Wildlife Site / Ancient Woodland (located immediately adjacent to the site) and veteran trees.
Summary of Baseline, and Sensitivity of Receptors	Table 8.11 Baseline Sensitivity, p8-64	As per the comment above, the table should be updated to assess hydrological impact to Huntingdon Wood County Wildlife Site / Ancient Woodland and veteran trees.
Construction Phase Impact Assessment	Table 8.12	The table should be updated to assess the impact to Huntingdon Wood County Wildlife Site / Ancient Woodland; and veteran trees.
Operational Phase Impact Assessment	Table 8.13	The table should be updated to assess the impact to Huntingdon Wood County Wildlife Site / Ancient Woodland; and veteran trees.

ES Vol 2 Appendix 7-1: Ecological Baseline Report [REP1-025]

Topic	Paragraph Number	Council's Comments
Limitations	2.3.2 & 2.3.5	<p>The council has reviewed Figure 7-3 of [APP-145] and cannot see any information either within the key or on the drawings to indicate "areas of limited access"</p> <p>The council asks the Applicant to clarify how this has been shown – or to add a different symbol / boundary showing the surveyed areas.</p>

ES Vol 2 Appendix 7-5: Great Crested Newt Survey Report [REP1-027]

Topic	Paragraph Number	Council's Comments
Pond 46	Table 2.1: Summary of Pond Access	The council notes that table 2.1 has been updated to confirm that 'no access' to Pond P46 during the surveys. No reason has been given as to why the pond could not be accessed. The council requests that the Applicant attempts to access all of the ponds listed in Table 2.1 to survey them during the 2026 survey season (until June 2026), especially Pond 46 which is located immediately adjacent to the access track.

ES Vol 3 Figure 2-3: Indicative Crossings Plan [REP1-29]

Topic	Paragraph Number	Council's Comments
Flood Risk and Hydrology	-	The Indicative Crossings Plan would benefit from the inclusion of county boundaries, as this would enable clear distinction of which consents (and how many) fall under each authority.

Outline Construction Environmental Management Plan [REP1-033]

Topic	Paragraph Number	Council's Comments
Flood Risk and Hydrology		In its capacity as the Lead Local Flood Authority the council has no further comments on this matter. However, as it relates to ecology please see comments below.
Reasonable Avoidance Measures Method Statement – breeding birds	2.1.1, Appendix B	Pre-commencement breeding bird checks should also be completed of land that has been left fallow / bare (e.g. halt to groundwork / construction activities) during the breeding bird seasons, so that the nests of birds that create nests on bare earth will be protected.

Reasonable Avoidance Measures Method Statement – bats	2.2.3, Appendix B	The council is unclear as to why tree with Potential Roost Feature – Multiple (PRF-M) are not covered by the 'Reasonable Avoidance Measures Method Statement for bats'. The council requests clarity on how these will be covered.
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Outline Operational Environmental Management Plan [REP1-037]

Topic	Paragraph Number	Council's Comments
At Scale Replacement	2.4.10	It is noted the further definition of large scale replacement provided in the revised oOEMP. The council wished to understand better the nature of the works and duration of replacement at scale from the Applicant to inform the appropriate trigger and details to be submitted to the local authorities. This to include any management plans for approval. Such procedures need to be included in the DCO.

Outline Landscape and Ecological Management Plan [REP1-041]

Topic	Paragraph Number	Council's Comments
Outline Farmland Bird Mitigation Strategy (OFBMS)	4.2.7, Appendix C	<p>The council is of the view that insufficient evidence has been provided to demonstrate how ground-nesting farmland birds of open-habitat will be adequately mitigated.</p> <p>The mitigation for ground-nesting farmland birds that require open ground (e.g. skylark, lapwing and yellow wagtail) is based on the assumptions that the solar farm will create an ideal situation and that it can support <i>“highly suitable nesting habitat and promote multiple successful broods over the course of a breeding season”</i> when compared with the current situation (modern agricultural landscapes). However, no evidence has been provided to substantiate these claims.</p> <p>The council has been unable to find research that shows this to be the case. Therefore, the council requests that the Applicant provides evidence to demonstrate large solar farms of the</p>

		<p>same size / magnitude as the current application have achieved this, particularly for the case of skylarks.</p> <p>The council would expect the scheme to deliver the same number of territories for ground-nesting farmland birds as that being lost (as set out in our Local Impact Report), which has been / is the approach taken for other DCO solar farm schemes in our area.</p>
Outline Farmland Bird Mitigation Strategy (OFBMS) - monitoring	6.1.1, Appendix C	<p>The council is of the view that the proposed monitoring scheme will not adequately monitor the success of the proposed OFBMS because it only proposes to monitor “<i>proposed habitat features to ensure they are establishing as expected are meeting the target habitat type</i>” or monitor nest boxes and does not consider whether farmland bird population will respond as assumed at paragraph 4.2.7.</p> <p>Paragraph 4.2.7 assumes that the habitat created will deliver “<i>highly suitable nesting habitat and promote multiple successful broods over the course of a breeding season.</i>” With the argument here being that the scheme will deliver higher number of broods, particularly for skylark, when compared to the current agricultural practices.</p> <p>The council therefore requests that the monitoring scheme is updated to include monitoring of overall success of ground-nesting breeding season, by surveying the number of broods and number of young that have managed to successfully fledge in a breeding season. This would also need to include a baseline survey, to determine the current farmland bird breeding / fledging success. Without this data, the success of the Outline Farmland Bird Mitigation Strategy (OFMS) cannot be determined.</p>
Outline Farmland Bird Mitigation Strategy (OFMS)	Appendix C	The OFMS does not include any proposed remedial action, if the bespoke measures for ground-nesting birds (open ground) are not able to support the current population levels; then, off-site measures will be required to address any shortfall.
Outline Farmland Bird Mitigation Strategy (OFMS) - skylark	Ground nesting – open ground (skylark), Table 7.1, Appendix C	The council is of the view that the information for skylarks is very vague. The Applicant should quantify the values for anticipated (a) overall number of expected territories and (b) increase in breeding productivity and output.

Outline Public Rights of Way Management Plan [REP1-043]

Topic	Paragraph Number	Council's Comments
Surfacing and Reinstatement of PRoW	5.1.7	Any permanent change of surface to Public Rights of Way needs to be agreed by both the relevant planning authority and the relevant highway authority. In other words, agreement by the local planning authority through consultation is considered insufficient.
Site access	2.3.6	With the main site access being provided through Site D, all the main construction traffic for sites A, B and C will be crossing the affected PRoW in Cambridgeshire. Consideration should be given to provide managed crossings where construction traffic volumes is expected to be high.
Great Staughton 2 (Footpath 213/2) and all other PRoW in Cambridgeshire where construction routes cross.	6.16.3 This comment also applies to: 6.17.6 6.18.3 6.19.3	Warning signage must also be placed on either side of the crossing points to warn construction traffic to be aware of the presence of PRoW users. The current wording is that only PROW users will be warned of construction traffic, and not the other way round.
Hail Weston 7 (Bridleway 112/7)	6.17.1	Any temporary diversion must be of an equivalent quality or better than the path it is replacing and must be approved by the Local Authority's Rights of Way Officer before it comes into use.
Management of PROW During the Operational Phase	7.2.3	Should any closure of a permissive path be proposed, then the local Highway Authority's Rights of Way officer or equivalent must also be consulted, in addition to the Local Planning Authority.

Outline Surface Water Management Plan [REP1-047]

Topic	Paragraph Number	Council's Comments
Flood Risk and Hydrology		No further comments (See comments above to Applicants response to Relevant Representations [REP1-055], Page 5 and 6 of this document.)

Outline Archaeological Mitigation Strategy [REP1-049]

Topic	Paragraph Number	Council's Comments
-	-	No further comments. (See comments above to Applicants response to Relevant Representations [REP1-055], Page 6 and 7 of this document.)

Outline Heritage Enhancement Strategy [REP1-051]

Topic	Paragraph Number	Council's Comments
-	-	No further comments. (See comments above to Applicants response to Relevant Representations [REP1-055], Page 6 and 7 of this document.)

Biodiversity Net Gain Report [REP1-053]

Topic	Paragraph Number	Council's Comments
Limitations	2.1.5	The council welcomes additional clarification about how the estimating of Biodiversity Net Gain scores for areas not accessed / surveyed and welcomes a 'precautionary' approach having been taken by scoring these habitats as 'good condition'.
Limitations	2.1.6	It is stated "areas of limited access shown on ES Vol 3 Figure 7-3 [EN010141/DR/6.3]". However, the council has reviewed Figure 7-3 of [APP-145] and cannot see any information

		either within the key or on the drawings to indicate areas that have not been surveyed. The council requests that a boundary is used to show the surveyed area; or a different symbol is used in the key to demarcate these inaccessible areas.
Ancient and Veteran trees	2.3.13	The council does not agree with this approach. The council would expect ancient / veteran trees assessments to be completed as part of habitat surveys for an ecological assessment to provide an accurate baseline and ensure that all irreplaceable habitats will be protected as part of the scheme.
Strategic significance	2.3.8 – 2.3.9 & 4.1.6	The council notes that baseline “condition data for habitats is available on request in GIS format on request”. The council requests that this information is shared with us.
Baseline BNG Assessment	3.1.2	The council welcomes the update of the document to incorporate the publication of the Cambridgeshire & Peterborough Local Nature Recovery Strategy and notes that strategic significance for pre-development and post-development has been revised to low.
Watercourse	4.1.4	The council notes clarification that “no direct interventions are proposed to watercourses and ditches” - this is considered a missed opportunity to maximise biodiversity opportunities within the site and deliver 10% BNG uplift.
River Condition Assessment	Appendix 3	<p>The council welcomes the submission of the river condition assessment sheets, however, there is no context as to what these mean and how the values have been calculated, including what baseline information has been utilised etc.</p> <p>The council seeks that a river condition assessment report is submitted.</p>

Applicant’s Draft Itinerary for an Accompanied Site Inspection [REP1-065]

Topic	Paragraph Number	Council’s Comments
-	-	The Council has reviewed and has no additional suggestions for locations to visit.

Technical Note on Impact on A1 / B645 St Neots Junction [REP1-066]

Topic	Paragraph Number	Council's Comments
Traffic and Transport	3.2.1	The use of 1.4 persons per car should be considered as the realistic scenario and not a 'Sensitivity test' albeit that the modelling as submitted appears to show that there will be no unacceptable impacts using this occupancy figure.
	Appendix C	The LHA would usually require Junctions modelling to be carried out using the 'DIRECT' profile rather than the 'HOUR' profile to take account of fluctuations over the peak hours. However, in this case the LHA would defer to National Highways as to acceptability of the modelling which has been undertaken as the LHA did not specifically request modelling of these junctions.

Hydraulic Modelling Report [REP1-067]

Topic	Paragraph Number	Council's Comments
Hydrology and Flood Risk		The Environment Agency (EA) requested the pluvial modelling, and the council therefore has no comments to make on this aspect. Once agreed with the EA, this modelling should be used to inform Chapter 8 Hydrology and Flood Risk.

END