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The Planning Inspectorate
National Infrastructure Planning
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BY ONLINE SUBMISSION ONLY

28th April 2026

Dear Sir/Madam

**DEADLINE 2 – COMMENTS ON RESPONSES TO RELEVANT REPRESENTATION AND
UPDATED/ADDITIONAL DOCUMENTS SUBMITTED BY THE APPLICANT**

Project: East Park Energy

Applicant: BSSL Cambsbed 1 Limited

Your Ref: EN010141

Huntingdonshire District Council (HDC/the Council) has reviewed the Applicant's submission documents and has submitted the following to the Examining Authority (ExA) to date:

- [RR-494] Relevant Representations (14 January 2026);
- [REP1-076] Written Representations (7 April 2026);
- [REP1-077] Summary of RR exceeding 1500 words (7 April); and
- [REP1-078] Local Impact Report (7 April 2026).

The Applicant has responded to the Council's Relevant Representation **[RR-494]** through **[REP1-055]** 'Applicant Responses to Relevant Representations – Host Authorities, Statutory Environmental Bodies, and Other Interested Parties'.

Table 1 below sets out the Council's comments on the Applicant's responses and utilises a RAG rating system for clarity, as follows:

- Green – Matter agreed or no further comments required;
- Amber – Further discussion required; and
- Red – Matters where, notwithstanding the Applicant's clarification or response, the Council remains in disagreement and considers that further information or discussion is required, including where appropriate through the Examination process (for example, at an Issue Specific Hearing).

The Table follows the format adopted by the Applicant in **[REP1-055]**, with the addition of a column setting out the Council's comments. The RAG ratings are provided to assist the Examination and are informative only.

Table 2 below sets out the Council's comments on the updated and additional documents submitted by the Applicant at Deadline 1. In respect of any documents not included, the Council has no comments to make.

Other submissions requested under Deadline 2 (Rule 8 Letter [PDA-006])

- Comments on Written Representations (WR): The Council may have reviewed but does not comment on other parties' Written Representations.
- Comments on Relevant Representations (RR): The Council may have reviewed but does not comment on other parties' Relevant Representations.
- Comments on the Local Impact Reports (LIR): The Council may have reviewed but does not comment on other parties' Local Impact Reports.
It should be noted that the Council is in continual discussion with the other Host Authorities and the joint External Consultant so the Council is fully aware of the respective Relevant Representations and Local Impact Reports as submitted.
- Comments on the Applicant's draft itinerary for the Accompanied Site Inspection (ASI): the Council has no comment to make.
- Comments from affected persons on Applicant's updated Land and Rights Negotiation Tracker **[PDA-013/014]**: the Council has no comment to make.
- Comments on any updated or additional documents from the Applicant: In respect of updated or additional documents submitted by the Applicant at Deadline 1, including amended Environmental Statement chapters, outline management plans, and an updated draft DCO, these are currently under review having regard to the Applicant's responses, the Council's Local Impact Report, and the ongoing legal review of the draft DCO. Further and more detailed responses will be provided at later Examination deadlines.
It is noted that, in conjunction with the other Host Authorities and in agreement with the Applicant, the Host Authorities have instructed a legal review of the draft DCO. The Host Authorities have held several meetings with the Applicant and respective legal consultants to discuss the draft DCO leading to an exchange of notes setting out mutual suggested amendments and matters of address. It is further noted that this undertaking will inform the Council's review of the Applicant's Management Plans **[REP1-032 to 051]**. This remains work-in-progress. On this basis, the Council will currently not be submitting comments against the draft DCO Agreement **[APP-016] [REP1-005/006] [REP1-054]**.
- Comments on any additional submissions received by deadline 1 and accepted by the Examining Authority (ExA): the Council has no comment to make.
- The Applicant's revised draft DCO: response as noted above.
- The Applicant's UAV detailed flight plan: the Council has no comment to make.
- Comments on draft statements of common ground (dSoCG): the Council and other Host Authorities remain in discussion with the Applicant regarding the dSoCG. As all Parties are currently working though and reviewing the responses and revert to the Relevant Representations, and in future to the Local Impact Reports, it is suggested that this

currently remains work-in-progress. Progress has been made in narrowing areas of disagreement, and this engagement continues constructively.

- Any further information requested by the ExA under rule 17 of the Examination rules: the Council note that to date no further information has been requested from the Council.

I trust that this information is of assistance to you. Should you wish to discuss this matter further then please contact [REDACTED] by email: [REDACTED]@[huntingdonshire.gov.uk](mailto:[REDACTED]@huntingdonshire.gov.uk).

Yours Sincerely

[REDACTED]

[REDACTED] – Head of Planning, Infrastructure & Public Protection (Chief Planning Officer)
Development Services
Corporate Delivery
Huntingdonshire District Council

Table 1. Huntingdonshire District Council's comments on the Applicant's responses to the Relevant Representation

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-01	4.1, 4.2	Emerging Local Plan	<p>In October 2025, the Council issued its Preferred Options consultation on the emerging Local Plan. Paragraph 49 of the National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework. At the time of writing, the emerging Local Plan remains at an early stage, meaning that little, if any, weight can currently be attributed to the Preferred Options document. This position may evolve as responses to the consultation are received, collated, and published. Later stages in the DCO process may mean that greater weight is given to emerging policies.</p>	<p>The Applicant is aware of the early work on Huntingdonshire District Council's emerging Local Plan, including the consultation that commenced in October 2025 following submission of the DCO application. The Applicant notes HDC's comment that little, if any, weight can currently be attributed to the Preferred Options document. The Applicant will continue to engage with HDC as the emerging local plan progresses. Should the plan progress over the course of the examination then the Applicant will provide an update to the Examining Authority.</p>	<p>[GREEN]</p> <p>The Council notes the Applicant's response and has no further comments at this stage.</p>
HDC-RR-02	7.8, 7.9, 7.10	Landscape and Visual Impact	<p>For Bedford LCA 1B: Riseley Clay and Farmland effects at Y10 are assessed as minor and nonsignificant. Given the primary source of landscape change is the introduction of the PV panels, the effect of mitigation by Year 10 is overstated and although the scheme may be better integrated/mitigated it is still a large area of increased industrialisation in the long term, which constitutes a significant effect on LCA1B. At Year 10 the ES LVIA indicates there will be a Moderate Adverse level of effect on the landscape character of LCA 1B, under the LVIA methodology this could be significant or non-significant, the former being more appropriate.</p>	<p>The Applicant notes the Council's comments, and welcomes the acknowledgement that effects on visual receptors are broadly accepted as appropriate. The Applicant respectfully disagrees that the operational Year 10 effect on Bedford Borough Council LCA 1B (Riseley Clay Farmland) should be reported as significant. ES Vol 2 Appendix 5-1 [APP-069] adopts a 'sequential combination' approach, combining susceptibility and value to determine sensitivity, and combining scale, geographical extent, duration and reversibility to determine magnitude; sensitivity and magnitude are then combined, using professional judgement, to determine the level and significance of effect, with intermediate</p>	<p>[GREEN]</p> <p>The Council notes the Applicant's response and defers further comment to Bedford Borough Council, as Bedford LCA 1B falls within their administrative boundary.</p>

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			<p>Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the mitigation to screen the solar panels but any effects of obstructed or truncated views are not referenced and will adversely change the experience of users of PRow. Similar to the comments for landscape character, it is noted that wherever there is a moderate effect on visual amenity this is taken to be non-significant, noting the methodology indicates it could and in some cases should be a significant effect. The overall conclusion is that there is some slight under-representation of significant effects.</p>	<p>levels of effect (including 'Moderate to Major') used where appropriate. On that basis, the Environmental Statement reports the residual operational effect on LCA 1B at Year 10 as 'Moderate Adverse (Not Significant)', and the Applicant maintains that conclusion. In respect of the Council's suggestion of a slight under-representation of significant effects, the Applicant respectfully disagrees. The LVIA has applied the methodology set out in ES Vol 2 Appendix 5-1 [APP-069], combining sensitivity and magnitude through a sequential combination approach and professional judgement to determine both the level and significance of effect. The Applicant therefore maintains the significance conclusions as reported in the Environmental Statement, including that effects described as 'Moderate Adverse' have been assessed as not significant within this LVIA. Further, the Council's point regarding 'obstructed or truncated' views is not accepted. Where applicable, the viewpoint assessments in ES Vol 2 Appendix 5-4 [APP-072] expressly acknowledge that mitigation planting can alter the experience of a view from the baseline situation, including because the planting implemented at Year 0 would be evident at Year 10, following ten years of growth, and the view would therefore remain altered.</p>	
HDC-RR-03	7.11, 7.12, 7.13	Landscape and Visual Impact	<p>The non-significant effect on Huntingdonshire LCA: Southern Wolds in operation is contrary to what might be expected given the PV panels would occupy a central and high percentage of the LCA, at least in relation to the extent of the LCA south of Grafham Water. Some justification is provided in that there are industrialising influences present in the LCA, however this seems to be given too much weight, along with mitigation, in what is, as described in the LVIA, a rural landscape.</p>	<p>The Applicant notes Huntingdonshire District Council's comments but respectfully disagrees that the non-significant operational effect on Huntingdonshire LCA: Southern Wolds is under-represented. ES Vol 2 Appendix 5-3 [APP-071] summarises that the level of effect during operation on Southern Wolds LCA is Moderate Adverse (Not Significant), reducing to Minor to Moderate Adverse (Not Significant) at Year 10 as mitigation planting establishes and the Scheme assimilates further within the LCA. Linear belts of</p>	<p>[AMBER]</p> <p>The methodology as set out in ES Vol 2 Appendix 5-1 LVIA Assessment Methodology [APP-069] does not provide a clear narrative on which significance of effect ratings are deemed to be significant or not significant. Although it is acknowledged that borderline levels of significance of effect can be either significant or not significant as long as a clear narrative</p>

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			<p>Comments regarding visual amenity as per BCC para 7.8 above.</p> <p>The overall conclusion is that there is an under-representation of significant effects.</p>	<p>planting beside the Scheme, specifically on field boundaries, would limit visibility within the wider landscape by Year 10, and enhance an existing characteristic of the Southern Wolds LCA. The detailed assessment in ES Vol 2 Appendix 5-3 [APP-071] explains the sensitivity judgement for the Southern Wolds LCA, including the absence of landscape designation, its large-scale gently undulating arable character (which is described as being of lower susceptibility to change), the presence of modern influences within the baseline, and the landscape strategy emphasis on high quality landscaping to soften and integrate development and protect rural long-distance views.</p> <p>The Applicant therefore maintains the LVIA conclusions as reported.</p>	<p>is provided to explain this. Typically, methodologies used for LVIA as part of EIA, generally set out moderate to major effects to be significant. There is no clear narrative within paragraphs 2.4.33 and 2.4.34 of ES Vol 2 Appendix 5-3 [APP-071] to clarify why a moderate significance of effect for operation is not classified as significant.</p> <p>The assessment heavily relies on the establishing landscape mitigation for the Year 10 assessment and the reduction in visibility of the Scheme, and gives very little weighting to the long-term change in land use associated with the Scheme.</p>
HDC-RR-04	7.14	Landscape and Visual Impact	<p>It is accepted that based on The Glint and Glare study extract in paras. 5.8.73 to 5.8.76 of the ES LVIA that due to the existing screening and / or proposed screening in the landscape, glint and glare impacts would be acceptable unless revised, new or additional information is received.</p>	<p>The Applicant notes the Council's comment and welcomes the acknowledgement that due to existing and/or proposed landscape screening, glint and glare impacts would be acceptable and no additional mitigation is required beyond the embedded landscape proposals.</p>	<p>[GREEN]</p> <p>The Council notes the Applicant's response and has no further comments.</p>
HDC-RR-05	7.15, 7.16, 7.17	Landscape and Visual Impact	<p>ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [APP-121] shows the proposed landscape and visual mitigation for the Scheme.</p> <p>The landscape proposals are tailored to the location and required functions of each part of the Scheme, noting that these change across the DCO site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where</p>	<p>The Applicant welcomes the acknowledgement from HDC that the design of the Scheme is well-considered, retains the legibility and character of the landscape, and where possible reduces the visual effects.</p> <p>The Applicant also welcomes the acknowledgement from HDC that the Scheme would leave a positive legacy through the delivery of strengthening and supplementing the landscape character within the Order limits.</p>	<p>[GREEN]</p> <p>The Council notes the Applicant's response and has no further comments.</p> <p>See response to HDC-RR-70 regarding legacy.</p>

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			<p>possible, especially for visual receptors, at the edges of settlements, and along routes connecting settlements.</p> <p>Most importantly, as set out in Design Principle 7: The Scheme as drawn on the landscape Illustrative Environmental Masterplan will leave a positive legacy through the delivery of strengthening and supplementing the landscape character within the Order Limits post operation. The means of securing these benefits are as yet unclear.</p>	<p>With regard to how ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121] is secured, the same plan is included as the Illustrative Landscape Proposals at Appendix A of the oLEMP [APP-159].</p> <p>The oLEMP is a control document that will be certified as part of the Development Consent Order (DCO).</p> <p>Requirement 4 in Schedule 2 of the draft DCO [AS-008] requires that a final Landscape and Ecological Management Plan (LEMP), in substantial accordance with the oLEMP, is prepared and approved by the relevant LPAs prior to commencement of construction. The final LEMP will implement the landscape proposals, which must therefore be in substantial accordance with the Illustrative Landscape Proposals at Appendix A of the oLEMP [APP-159].</p> <p>With regard to how the positive legacy of the Scheme are secured, the Applicant has provided responses earlier in this document at BBC-RR-32 and BBC-RR-168.</p>	
HDC-RR-06	8.2, 8.3	Arboriculture	<p>The Arboricultural Impact Assessment is considered robust and identifies numerous valuable trees, including veterans, across the landscape. The anticipated impact on these trees is assessed as minimal. A small number of trees are in direct conflict with the proposals; therefore, equipment should be located outside the falling distance of trees to avoid future pressure for removal and to mitigate shading effects from canopies.</p>	<p>The Applicant welcomes HDC's comment that ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [APP-056] is considered robust.</p> <p>In relation to the protection of trees, the outline Construction Environmental Management Plan (oCEMP) [APP-156] and outline Landscape and Ecological Management Plan (oLEMP) [APP-159] secure mitigation for trees, hedgerows and woodland.</p>	<p>[GREEN]</p> <p>The Council notes the Applicant's response and has no further comments.</p>

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HDC-RR-07	9.5	Cultural Heritage and Archaeology	The proposed belts of planting will also help screen those arrays closest to the village but there will still be some visual impact in views where the topography elevates the arrays over the proposed screening and existing vegetation. Taken as a whole, the impact of the solar farm on the significance of Great Staughton heritage assets is likely to be less than substantial.	The Applicant notes and welcomes that the council is in agreement with the assessment of ' <i>less than substantial harm</i> ' (minor effects) on the Great Staughton heritage assets. We note that these ' <i>Great Staughton heritage assets</i> ' aren't defined in the Council's comment, but expect that they are related to the Great Staughton Conservation Area (Asset 164) as well as upon the settings of the grade I listed Church of St Andrew (Asset 534) and the grade II listed the Manor (Asset 526) and its associated gatepiers (Listing Number 1214656) and non-designated parkland (Asset 648) as is summarised in paragraph 6.8.62 of ES Vol 1 Chapter 6 [APP-042] .	[GREEN] The Council notes the Applicant's response and has no further comments.
HDC-RR-08	9.6	Cultural Heritage and Archaeology	The additional assessments of Kimbolton Conservation Area and its associated heritage assets confirm the ZTV illustration showing limited intervisibility between the solar arrays and the built form. This is primarily because Kimbolton sits at a lower elevation within the landscape. The impact of the solar farm on these heritage assets is therefore likely to be minor. As described below, the impact of the solar farm on the significance of Warren House remains unclear and further work is required.	The Applicant notes and welcomes that the council is in agreement with the assessment of minor effects on heritage assets within Kimbolton. We note that the specific assets relating to the ' <i>Kimbolton Conservation Area and its associated heritage assets</i> ' aren't defined in the Council's comment, but expect that they are related to the grade I listed Kimbolton School (Asset 795) and associated gatehouse (Asset 796) and the Church of St Andrew (Asset 799) as is summarised in paragraph 6.8.62 of ES Vol 1 Chapter 6 [APP-042].	[GREEN] The Council notes the Applicant's response and has no further comments.
HDC-RR-09	9.7, 9.8, 9.9	Cultural Heritage and Archaeology	With reference to Asset No.984 – Warren House –Grade II* listed building, at page 40 the Plates / LVIA viewpoints references are incorrectly labelled as ES Volume 1; the Viewpoints are in ES Volume 3. The Viewpoints in Environmental Statement Volume 3 – Figures; Chapter 5 Figures – Landscape and Visual are not labelled with a determining suffix contrary to the references given in ES Vol 2, Appendix	The Applicant has checked and updated the referencing of LVIA viewpoints within ES Vol 2, Appendix 6-4: Settings Impact Assessment [APP-083] [as updated alongside this submission] . The applicant notes the Council comment that Warren House has been incorrectly identified as a vista building but would highlight that Warren House is described in its Listing Description as being ' <i>built as a 'vista' building in late C18 facing Kimbolton</i>	[AMBER] NPS EN-1 paragraph 5.9.12 states: <i>"As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets"</i>

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			<p>6-4: Settings Impact Assessment [APP-083].</p> <p>The assessment incorrectly identifies Warren House as being built as a 'vista building'. Research indicates that it was initially built as a warrener's lodge, other examples of which were constructed to offer views across the estate rather than simply to feature within views from the house and its grounds. The buildings significance therefore also derives from its association with the wider views of the estate within the Kym valley that are afforded by its elevated outlook. The impact of the solar farm on views from Warren House are therefore relevant and should be included in an additional viewpoint from the building. The current assessment based on views from the opposite side of the valley is inadequate to identify the level of harm to the significance of this highly graded heritage asset.</p> <p>HDC considers it essential that this matter is addressed to ensure a robust assessment of heritage impacts. We therefore invite the applicant to engage with the LPA at the earliest opportunity to agree an appropriate additional viewpoint from Warren House.</p>	<p><i>Park'</i> (https://historicengland.org.uk/listing/the-list/list-entry/1211750). The Applicant notes the Council's comment that as a warrener's lodge it would have been constructed to afford views across the estate within the Kym Valley and not simply '<i>feature within views from the house and its grounds</i>'. Despite the discrepancy above the Applicant has considered Warren House to have sensitivity in changes to views afforded from its elevated position and had assessed that the building had a Medium relative sensitivity to changes in its setting as is set out on pages 40-41 of ES Vol 2 Appendix 6-4: Settings Impact Assessment [APP-083]. The Applicant notes that the Council has made no comment in relation to the assessment of relative sensitivity. The Applicant notes the statement that views of the solar farm are '<i>therefore relevant</i>', which implies that these have not been considered within the assessment. A settings assessment visit to the vicinity of Warren House was conducted which '<i>confirmed that distant glimpses of the Scheme may be possible with the ridgeline visible to the south (in the backdrop of its views of the park), but that these glimpses would be obscured by nearby and distant vegetation</i>' which, given the notable distance and screening, has been assessed as resulting in a Low impact upon the setting of the asset, as set out on pages 40-41 of ES Vol 2 Appendix 6-4: Settings Impact Assessment [APP-083]. The Applicant stands by the assessment of a Low impact during the operational phase upon the setting of the Warren House, as is defined in the assessment methodology as '<i>Alterations to the asset's baseline setting, which do not affect the ability to understand, appreciate or experience the contribution that setting makes</i></p>	<p><i>and no more than is sufficient to understand the potential impact of the proposal on their significance."</i></p> <p>Warren House was initially scoped out of the EIA as being further than 3km from the proposed development boundary. Historic England and HDC requested that it be included due to its Grade II* listing and commanding location. The Local Planning Authority Statutory Consultation Scoping Response dated 28th November 2023 (HDC reference 23/70097/SCOP) states: '<i>All Grade I and Grade II* heritage assets should be subject to Viewpoint Assessment and special attention given to views from heritage assets that are either tall structures or those in elevated locations.</i>'</p> <p>It is considered that a full assessment of the visual impact of the solar panels and infrastructure in views from Warren House towards Site B to the south is still required to understand the potential impact of the solar farm upon the significance of Warren House. Within the Settings Impact Assessment [APP-083] on page 40-41, the Applicant bases their assessment on "a visualisation taken from the elevated ridgeline to the east of Little Staughton (VP51ii) [which] shows a potential heavily obscured (by mature vegetation and trees) glimpse of the location of Warren House on the elevated ridge to the north of the Scheme". The assessment of the views from Warren House is therefore based on an inference of potential harm rather than</p>

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				<p><i>to the asset's overall significance. The key characteristics of the setting are not eroded' as set out in Table 6.7 of Chapter 6 of the ES [APP-042].</i></p> <p><i>Due to the distance and limited visibility of the Scheme (assessed as being limited to glimpses of elements of the solar development in Sites A and B, at a distance of over 3km and obscured by nearby and distant vegetation) the Applicant does not believe that the key characteristics of the Warren House's setting would be eroded or that the ability to understand, appreciate or experience the contribution that setting makes to the house's overall significance would be affected.</i></p> <p><i>The Applicant therefore maintains the setting assessment conclusions as reported.</i></p> <p><i>The Applicant notes that a request for a visualisation from Warren House was not raised during the statutory consultation. The Applicant does not agree that a visualisation is necessary to inform the assessment of effects from this asset, and that an understanding of the impact and whether a likely significant effect would occur can be gained without as visualisation.</i></p>	<p>on a viewpoint from the heritage asset itself. An additional viewpoint from Warren House is required to confirm the level of harm identified by the initial assessment.</p> <p>Both parties agree that the proposed development would have an impact on the setting of Warren House during the operational phase. The unresolved issue is the magnitude of impact and therefore the level of effect.</p>
HDC-RR-10	10.7	Ecology and Nature Conservation	The additional information that has been incorporated into the assessment since statutory consultation is welcomed, including 2025 bird survey data and additional rationale for the scoping out of Grafham Water SSSI. Based on the updated information the Host Authorities are content that the Scheme is unlikely to result in significant effects on statutory designated sites of nature conservation importance.	The Applicant has previously addressed this comment with reference to BBC-RR-53 in Table 1.	<p>[GREEN]</p> <p>The Council notes the Applicant's response and has no further comments.</p>

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HDC-RR-11	10.8	Ecology and Nature Conservation	<p>The Scheme will involve works adjacent to two non-statutory sites, Huntingdon Wood County Wildlife Site (CWS) (designated for its ancient woodland, an irreplaceable resource), and Kangaroo Meadows CWS (designated for neutral grassland communities). While no direct loss of habitat within these sites is expected, the Host Authorities are concerned that there is currently insufficient information to verify the applicant's conclusion that these sites will not be adversely impacted during construction. Further information is required to assess the potential for hydrological impacts through trenching in close proximity to Huntingdon Wood CWS, potential impacts of construction lighting, and potential impacts of the use of an existing culvert for construction access. At Kangaroo Meadows CWS clarification is required on the potential for adverse effects on existing grassland through shading by proposed mitigation woodland planting once mature.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-54 in Table 1.</p>	<p>[GREEN]</p> <p>The Council welcomes the clarification provided by the Applicant and is content that this matter is addressed.</p>
HDC-RR-12	10.9	Ecology and Nature Conservation	<p>The Host Authorities welcome that the design and assessment have evolved to take account of previous consultation feedback on ecological issues. However, we remain concerned that the assessment for certain species groups is based on incomplete survey information (e.g. spot check surveys only for water vole/otter and some areas inaccessible for bird and newt survey). It is not always clear within the assessment how these shortfalls in data have been considered and their impact on the final assessment conclusions.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-55 in Table 1.</p>	<p>[GREEN]</p> <p>See responses to HDC-RR-12 onwards.</p>

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HDC-RR-13	10.10, 10.11	Ecology and Nature Conservation	<p>The Host Authorities are concerned that without suitable mitigation and compensation provision the Scheme has potential to result in a significant adverse effect on ground nesting birds, in particular skylarks (125 territories recorded within the Site). The ES [APP-043] sets out at paragraph 7.8.112 the intention to create large areas of open grassland 'to be of benefit for skylark and lapwing and to encourage nesting attempts within these areas'. The oLEMP [APP-159] currently provides insufficient detail to demonstrate that the proposed measures will be sufficient. It is recommended that a detailed farmland birds mitigation strategy (covering both breeding and non-breeding birds) is produced to include (but not be limited to):</p> <p>details of proposed habitat losses and gains (overall area and territory numbers);</p> <ul style="list-style-type: none"> • measures to be employed to protect ground nesting birds during construction and operational phases; • consideration of the phasing of both impacts and proposed mitigation/compensation provision; and • how the proposed management regime will ensure that habitats are managed in a suitable manner to ensure they remain suitable for use by skylark and other ground nesting birds. <p>These details are required to assess the appropriateness of the measures proposed and determine if further off-site compensation is required.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-56 in Table 1.</p>	<p>[AMBER]</p> <p>The Council welcomes the provision of the Outline Farmland Bird Mitigation Strategy (oFBMS) and the additional of breeding bird reasonable avoidance measures to the oLEMP.</p> <p>Further clarification is sought on a number of points relating to the oFBMS which are required to provide reassurance that the measures proposed are appropriate:</p> <ul style="list-style-type: none"> - A clear summary of the losses and gains in suitable habitat (in ha) - Further information to confirm the existing value of the areas identified for habitat creation for the target species - Explanation of how impact of Public Rights of Way (PRoW) have been considered in the areas of suitable habitat creation claimed.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-14	10.12	Ecology and Nature Conservation	<p>The Host Authorities are concerned that trees within and adjacent to the Site have not been surveyed to identify their potential to support roosting bats. The applicant has stated at paragraph 7.7.20 of the ES [APP-043] that 'trees present within the Site would be retained and protected during construction', however we consider that as a minimum the location of PRF-I and PRF-M trees should be established in order that it can be demonstrated within the CEMP or oLEMP that suitable protection buffers can be incorporated into the design for all relevant trees. The minimum 6m hedgerow buffer outlined in the ES would be insufficient to prevent disturbance where roosts are confirmed or have the potential to be present.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-57 in Table 1.</p>	<p>[AMBER]</p> <p>As per the Council's original comment, without knowing if trees are PRF-I or PRF-M it is not possible to verify that the buffer zones proposed around trees are sufficient to prevent the disturbance of any roosts that may be present. The 6m standard buffer around hedgerows would not for example be sufficient to prevent disturbance of a tree containing a maternity roost.</p> <p>Please refer to Table 2 for comments on the oCEMP.</p>
HDC-RR-15	10.13	Ecology and Nature Conservation	<p>The Host Authorities note that while the presence of hazel dormouse is unlikely, in the absence of survey it is not possible to fully rule out its presence. The small scale of potential hedgerow impacts is acknowledged; however further detail should be provided on how any residual risks of impacts on hazel dormouse will be avoided (e.g. through the application of a precautionary method of works incorporating sensitive timing and working methods).</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-58 in Table 1.</p>	<p>[GREEN]</p> <p>The additional documentation provided within the Reasonable Avoidance Measures Method Statements included within the oCEMP are considered sufficient to mitigate the residual risk of impacts on hazel dormouse.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-16	10.14	Ecology and Nature Conservation	<p>A single combined survey visit for water vole and otter has been undertaken for each proposed watercourse crossing point during June 2025. This survey appears to have consisted of spot checks of crossing point location rather a more comprehensive survey of suitable habitat within/adjoining the Site. The Host Authorities are concerned that for water vole in particular the presence of dense vegetation may have obscured field signs leading to under recording, and due to the restricted survey undertaken areas identified for 'enhancement' have not been subject to baseline surveys. The Host Authorities are content that the proposed pre-construction checks detailed in Section 5 of the oLEMP [APP-159] alongside the commitment to positive management of retained ditches provided in paragraphs 6.4.8 to 6.4.13 of the oLEMP are likely sufficient to demonstrate potential impacts can be mitigated if they are found to be present. However, further clarification is required on enhancement proposals including proposals for baseline surveys of areas identified for enhancement to check their existing water vole status.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-59 in Table 1.</p>	<p>[AMBER]</p> <p>The Council accepts the Applicant's clarification regarding the extent of the baseline surveys.</p> <p>In relation to the proposed enhancement works, the Council maintains that baseline surveys should be undertaken at all ditches that will be subject to enhancement works in advance of those works. The Council requests that the Reasonable Avoidance Method Statement for water vole and otter is updated to secure this action.</p>
HDC-RR-17	10.15	Ecology and Nature Conservation	<p>It is noted that 2025 surveys have confirmed the presence of great crested newt within the Site at waterbody references P14 and P25. The great crested newt survey report [APP-095] identifies P46 as adjacent to the Site but does not include details of this waterbody. Confirmation is required what (if any) survey has been undertaken at P46. The ES acknowledges that a Natural England licence will be required to cover the proposed works, however currently no letter of impediment has been obtained</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-60 in Table 1.</p>	<p>[GREEN]</p> <p>Pond 46 has now been added to the baseline report and it is clear no access has been possible to survey this location. Applicant's response is noted and the Council will await sight of letter of no-impediment later in the examination process.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			from Natural England.		
HDC-RR-18	10.16	Ecology and Nature Conservation	The Host Authorities welcome the proposed biodiversity mitigation / compensation set out in the ecology chapter [APP-043], however, some have not been adequately incorporated into other submission documents (e.g. environmental masterplan, engineering drawing and management plans) and therefore, delivery cannot be assumed. For example, references to incorporation of sensitive lighting design need to be better reflected in the content of the oLEMP and CEMP to ensure adverse effects on adjoining habitats such as Huntingdon Wood CWS and ancient woodland are avoided.	The Applicant has previously addressed this comment with reference to BBC-RR-61 in Table 1.	<p>[AMBER]</p> <p>No further information has been provided on the site specific measures that would be employed to ensure adverse effects on adjoining habitats of importance will be avoided. Relevant content in the oCEMP is now at paragraphs 4.1.30 to 4.1.33.</p> <p>It is requested that the oCEMP is updated to clearly acknowledge the sensitive receptors adjacent to the Site that should be of key consideration in developing the lighting design for the construction phase of the project.</p> <p>The Council welcomes the addition of the commitment to maximise BNG as far as is practicable within the oLEMP (new paragraph 3.6.2).</p> <p>It is acknowledged that the ongoing management of habitats meets the BNG guidance requirements. However, continue to advocate that measures should be included in the DCO to secure the permanent retention of those habitats outside of the area occupied by the operational arrays.</p>
HDC-RR-19	10.17	Ecology and Nature Conservation	The proposed woodland planting and that plants of local provenance are to be utilized is welcomed. The proposed woodland planting stock list should be further discussed with local authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities	The Applicant welcomes the Council's support for the principle of woodland planting and the use of locally sourced planting stock. The oLEMP [APP-159] provides the framework for the detailed planting specification to be finalised postconsent, including woodland, hedgerow and grassland seed mixes.	<p>[GREEN]</p> <p>The Applicant's response is welcomed and the Council is content that this matter is addressed.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			<p>should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease).</p>	<p>The Council's request to incorporate locally important species is noted. The indicative planting specifications in the oLEMP [AS-008] already include black poplar and elm (and specifies that locally suitable cultivars with high resistance to Dutch elm disease are to be used). The oLEMP states that woodland and hedgerow species mixes will be tailored to the prevalent conditions of the proposed location, including the use of more riparian mixtures alongside watercourses and the selection of shallow rooting species in proximity to utility easements.</p> <p>As secured by Requirement 4 the draft DCO [AS-008], no phase of the authorised development may commence until a detailed LEMP, in substantial accordance with the oLEMP, has been submitted to and approved by the relevant local planning authority. This approval mechanism provides the formal route through which the final woodland, hedgerow and associated planting schedules and seed mixes will be agreed with the relevant local planning authority.</p>	
HDC-RR-20	10.18	Ecology and Nature Conservation	<p>It is the Host Authorities' understanding that the powers requested under the DCO will not seek to remove any of the habitats created or established at the Site. However, following decommissioning (i.e. the removal of the physical infrastructure) all habitats would be returned to landowners, and at this point habitats could potentially be removed subject to the relevant legislative and policy requirements at the time being adhered to. The Council seeks agreement from the applicant that areas of species-diverse grassland to be created under the Scheme will be retained and their long-term management secured to ensure the beneficial effects</p>	<p>The Applicant can confirm that the Council's understanding of the landowner position is correct, as set out in our response in Table 1 above, reference BBC-RR-32.</p> <p>It is not in the Applicant's power to agree to the areas of species-diverse grassland being retained following the decommissioning of the Scheme.</p>	<p>[AMBER]</p> <p>This is a topic that the Council considers requires further discussion. The Council maintains that securing the long-term retention and management of these habitats is required to ensure beneficial effects identified in the ES are permanent. While it appreciates this may not form the current basis of the Applicant's agreements with the current landowners, it is unclear why there would be a barrier to achieving this with agreement of all parties.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			identified in the ES are permanent.		
HDC-RR-21	10.19	Ecology and Nature Conservation	<p>The Host Authorities welcome the inclusion of the expected biodiversity net gain metric outputs as commitment C12 of the Commitments Register [APP-154]. However, are concerned that these commitments are not currently reflected in the oLEMP, and currently the calculation undertaken is high level only. We request commitments are clearly stated in the oLEMP to ensure clarity on targets post construction. We also note that the final biodiversity net gain outcomes will be dependent on created habitats being maintained and suitably managed. Given the temporary nature of the development, and that the ongoing management of created habitats after demobilisation are not currently secured, we consider the current BNG calculation outputs (and linked beneficial effects) may therefore overstate the likely final scheme outcome.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-61 in Table 1.</p>	<p>[GREEN]</p> <p>The Council welcomes the addition of the commitment to maximise BNG as far as is practicable within the oLEMP (new paragraph 3.6.2).</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-22	10.20	Ecology and Nature Conservation	<p>The Host Authorities note that the minimum 6m buffer between the fenceline of the solar farm and the surround hedgerows specified in Section 3.4 of the oLEMP is low, in particular for hedgerows containing standard trees. We request that these minimum buffers are extended, and greater consideration is given to varying the overall extent of panels at the margins of the site to provide larger buffer zones that will enhance their value for a range of species.</p>	<p>The Applicant notes that the 6m buffer which is secured by the oLEMP [APP-159] is only a minimum, and that greater buffers could be included at the detailed design stage in relation to tree or woodland habitats. The Applicant has prepared ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [APP-056] which confirms that the 6m buffer is suitable to avoid tree and hedgerow loss across the Scheme.</p>	<p>[AMBER]</p> <p>The Council does not feel that the current oLEMP wording makes clear the need for the hedgerow buffer to extend to reflect the root protection zones of retained trees where these extend beyond 6m.</p> <p>The following amendment to the oLEMP wording at Table 5.3. page 41 is requested: <i>Hedgerows to include a minimum 6m buffer, extending beyond this to include the full root protection zone for retained trees where this extends beyond 6m, and excluding any locations where points of widening or crossing points, in which no works (other than landscaping) are to occur.</i></p>
HDC-RR-23	10.21	Ecology and Nature Conservation	<p>The Host Authorities have concerns regarding the method identified for establishment of species diverse grassland in the areas identified within the illustrative Environmental Masterplan [APP-121] and the oLEMP [APP-159]. These areas are largely currently in arable use and therefore likely to have high nutrient levels. Current proposals do not initially incorporate methods to reduce soil fertility (e.g. soil inversion) or promote diversity (e.g. sowing of yellow rattle). If there is a need to rely on frequent early cutting of the sward to reduce nutrient levels, this may be in conflict with the proposed use of the same areas to provide habitat for ground nesting birds.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-65 in Table 1.</p>	<p>[AMBER]</p> <p>In relation to the method of establishment the Council welcomes the additions to the oLEMP to reflect our previous comments. The Council request that results from the soil analysis are provided in the information supplied to the LPAs when the final LEMP is submitted for approval.</p> <p>It is noted that agreement is yet to be reached in relation to the overall bird mitigation approach and points regarding the suitability of created habitats for birds and how this links to the proposed approach to management continues to be an area where the Council has requested further information.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-24	10.22	Ecology and Nature Conservation	The embedded mitigation measures for veteran trees and trees with veteran features outlines in the oCEMP [APP-155] are welcomed. We request that for consistency, reference to these measures is also included within the oLEMP [APP-159].	The Applicant has previously addressed this comment with reference to BBC-RR-66 in Table 1.	<p>[AMBER]</p> <p>The Council welcomes this commitment. It requests that for consistency the wording of the two documents is aligned. It is requested that the oLEMP is updated to reflect the oCEMP wording:</p> <p><i>“Protect and retain existing trees and vegetation (in accordance with British Standard (BS) 5837:2012), and following an Arboricultural survey undertaken to the same standard prior to construction commencing) via construction exclusion zones and tree protective fencing”.</i></p>
HDC-RR-25	10.23	Ecology and Nature Conservation	The frequency of monitoring set out within Section 8.0 of the OLEMP is welcomed, but we note that the existing monitoring proposals appear largely aimed at assessing progress towards the Biodiversity Net Gain (BNG) targets. Given that the Site is utilised by a range of protected and/or notable species, including a significant ground nesting bird population, a more holistic monitoring strategy including bird surveys is necessary. This should include the consideration of species and wider ecosystem characteristics. Adherence to the standard approach to monitoring biodiversity promoted in Solar Energy UK guidance is strongly recommended.	The Applicant has previously addressed this comment with reference to BBC-RR-67 in Table 1.	<p>[RED]</p> <p>The Council expects to see a comprehensive monitoring strategy for the site including appropriate species monitoring.</p>
HDC-RR-26	10.25	Ecology and Nature Conservation	The BNG assessment has been undertaken using the Statutory Biodiversity Metric and is informed by an illustrative design and outline management proposals. As such, the reported biodiversity gains represent a high-level assessment and are subject to refinement as the Scheme design is	The Applicant has previously addressed this comment with reference to BBC-RR-69 in Table 1.	<p>[AMBER]</p> <p>The Council considers that the distinction between mitigation and BNG delivery proposed by the Applicant is not yet demonstrated and should be provided.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			progressed. In recognition of this, the Applicant has set specific project commitments that are lower than the headline gains indicated by the illustrative metric outputs. However, the extent to which measures proposed to mitigate significant effects are clearly distinguished from those intended to deliver BNG remains a matter for further examination.		
HDC-RR-27	10.26	Ecology and Nature Conservation	All BNG matters raised by the Planning Inspectorate in its Scoping Opinion are considered to have been addressed in the ES with the exception of the following with the Host Authorities comments on this provided in this representation: Clear differentiation between measures proposed to mitigate significant effects and measures proposed to support BNG.	The Applicant has previously addressed this comment with reference to BBC-RR-71.	[AMBER] The Council considers that the distinction between mitigation and BNG delivery proposed by the Applicant is not yet demonstrated and should be provided.
HDC-RR-28	10.27	Ecology and Nature Conservation	The Applicant is not currently subject to a mandatory requirement to deliver 10% BNG, as statutory BNG does not yet apply to Development Consent Order schemes. However, it is acknowledged that mandatory BNG for NSIPs is anticipated from May 2026 and that national policy and industry practice are increasingly moving towards the delivery of measurable biodiversity enhancements in advance of statutory requirements.	The Applicant acknowledges the Scheme is not subject to mandatory BNG.	[GREEN] No response required

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HDC-RR-29	10.28	Ecology and Nature Conservation	The Applicant does note Bedford Borough Council's requirement within its Local Plan 2030 to achieve a net increase in biodiversity and the Draft 2040 Local Plan, Policy DM 7 to secure a minimum of 10% BNG.	The Applicant notes adopted and emerging local policy in relation to BNG.	[GREEN] No response required
HDC-RR-30	10.29	Ecology and Nature Conservation	The Applicant has committed to delivering 70% net gain in area-based habitat units, 30% net gain in hedgerow units, and 5% net gain in watercourse units, as set out within the submitted BNG Report. These commitments provide transparency regarding the level of biodiversity enhancement proposed; however, it is noted that the figures are derived from high-level calculations based on outline design assumptions and do not, at this stage, represent secured or fully defined outcomes. It is noted that the current commitment made in BNG Report [APP-168] does not detail that this commitment will be secured onsite. The presumption based on the BNG report is that it will be possible to achieve this level of commitment onsite, however confirmation should be sought.	The Applicant acknowledges that the assessment has been based on an illustrative design, albeit an illustrative design that is secured by Appendix A Illustrative Landscape Proposals of the outline Landscape and Ecological Management Plan (oLEMP) [APP-159] (which the Scheme must be developed in substantial accordance with). Out of caution and to avoid any future compliance issue, the Applicant has elected to claim and commit to a slightly lower BNG (as set out in Section 7.8 of the Planning Statement [APP-031]) to allow future flexibility if required at the design stage. The Applicant will endeavour at the detailed design stage to meet or even exceed the higher BNG totals as assessed in the BNG Report [APP-168], particularly with regard to watercourse units. The Applicant has updated the oLEMP [as updated alongside this submission] to commit to providing the biodiversity net gain which is set out in paragraph 7.8.12 of the Planning Statement [APP-031].	[GREEN] The Applicant's response in confirming this is welcomed. The Council notes that delivery of this will be dependent on detailed design. The Council also notes the Applicant's response to BBC-RR-72 [REP1-055] on the same point confirming BNG delivery is presumed to be delivered within the Order limits through the proposed landscape design.
HDC-RR-31	10.30	Ecology and Nature Conservation	The Host Authorities note that expectations in relation to BNG vary across the administrative areas affected by the Scheme. In particular,	The Applicant notes this comment. The Applicant has committed to a substantially higher BNG in area-based habitats and hedgerow habitats than is	[GREEN] No response required.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			<p>Cambridgeshire County Council has articulated aspirations for higher levels of BNG through strategic policy and consultation responses, reflecting wider regional ambitions for nature recovery, while Bedford Borough Council and Huntingdonshire District Council similarly seek measurable net gains for biodiversity through local plan policy. The Examination will provide the appropriate forum to consider how the Applicant's proposed BNG commitments align with these differing local expectations and emerging national guidance.</p>	<p>expected by local policy. In relation to watercourse units the committed BNG is less than 10% for the reasons set out at paragraph 7.8.8 of the Planning Statement [APP-031].</p>	
HDC-RR-32	10.31	Ecology and Nature Conservation	<p>With regard to methodology, the BNG Report describes the use of UK Habitat Classification and the Statutory Biodiversity Metric condition criteria to inform baseline assessments. While this approach is appropriate in principle, further clarity would be beneficial on how baseline condition judgements have been applied consistently across extensive habitat areas, particularly where professional judgement has been relied upon. At this stage, no detailed habitat condition information has been provided.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-74 in Table 1.</p>	<p>[AMBER]</p> <p>The Applicant's explanation is noted; however, absence of parcel-level condition data limits the ability to verify consistency of condition assessments across the Site.</p>
HDC-RR-33	10.32	Ecology and Nature Conservation	<p>The Host Authorities support the Applicant's robust and transparent application of the biodiversity trading rules, which is considered appropriate at this stage.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-75 in Table 1.</p>	<p>[GREEN]</p> <p>No response required.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-34	10.33	Ecology and Nature Conservation	The Scheme comprises a large-scale ground-mounted solar photovoltaic development, and further clarification would be beneficial on how under-panel habitats are classified, managed and condition-scored within the BNG assessment over the operational lifetime of the Scheme, and the extent to which these areas contribute to the reported biodiversity gains.	The Applicant has previously addressed this comment with reference to BBC-RR-76 in Table 1.	[GREEN] The Applicant's response is noted, and the Council is content that this matter is addressed.
HDC-RR-35	10.34	Ecology and Nature Conservation	The Host Authorities note that delivery of the proposed BNG outcomes is reliant on outline management measures, with limited detail currently provided on how habitats will be secured, managed and monitored over the lifetime of the Scheme. While it is indicated that further detail will be secured through a Requirement attached to the draft DCO, additional clarity will be required through the Examination process to ensure that the proposed BNG commitments are capable of being delivered and maintained in practice.	Requirement 4 of the draft DCO [AS-008] prevents any phase of the authorised development from commencing until a landscape and ecological management plan (LEMP) for that phase, in <u>substantial accordance with</u> the submitted oLEMP [APP-159] , has been submitted to and approved by the relevant local planning authority. This provides the mechanism by which the necessary detailed prescriptions are secured and then enforceable for the operational lifetime of the Scheme. Section 8 of the oLEMP [APP-159] sets out how habitats will be monitored, with Section 8.2 referring specifically to BNG. Paragraph 8.2.4 of the oLEMP [APP-159] states that <i>“Details regarding the monitoring criteria and specific methods to be used for each habitat type will be outlined in a Biodiversity Net Gain Habitat Monitoring and Management Plan, to be prepared as part of the final LEMP.”</i>	[GREEN] The Applicant's response is noted and the Council is content that this matter is addressed.
HDC-RR-36	10.35	Ecology and Nature Conservation	In addition, limited detail is provided regarding how habitats of biodiversity value established during the operational phase would be treated at decommissioning. Given the proposed operational lifetime of up to 40 years, further clarification will be required to ensure that biodiversity gains are not	The Applicant has previously addressed this comment with reference to BBC-RR-78 in Table 1.	[AMBER] The Applicant's response in to BBC-RR-78 signposts to BBC-RR-32 but does not directly address how habitats created to deliver biodiversity gains would be treated at decommissioning.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			inadvertently lost at that stage.		<p>It is understood that, while certain landscape features such as woodland, hedgerows and trees are likely to be retained, the long-term retention of other habitats that contribute to biodiversity gains would be subject to landowner discretion following decommissioning.</p> <p>The Council acknowledges that it may not be reasonable for the Applicant to secure retention of all habitats beyond the operational life of the Scheme, particularly where land is returned to third-party ownership. It is also recognised that many habitats would be established early and would therefore deliver biodiversity benefits over a substantial period, potentially up to 40 years.</p> <p>However, in the absence of secured measures for post-decommissioning retention, there remains uncertainty as to whether these biodiversity gains would persist in the longer term. While any future change in land use may be subject to separate planning controls, this does not guarantee retention of habitats established as part of the Scheme.</p> <p>On this basis, further clarification is required to confirm how this uncertainty has been taken into account in the assessment of biodiversity benefits and the weight attributed to these within the planning balance.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-37	11.2	Flood Risk, Drainage and Surface Water	It is noted that small areas of the site within the Order Limits are located within Flood Zones 2 and 3, however all critical infrastructure (excluding watercourse crossings) have been sequentially located in areas at the lowest possible risk of fluvial flooding (Flood Zone 1). Where solar arrays are to be located within areas at risk of flooding, it is proposed to install these such that the underside of the panels would be above the maximum predicted flood levels, with only supporting legs of the mounting tables within the flood extent. Comments on the acceptability of this approach, and the proposed watercourse crossings are deferred to the Environment Agency.	The Applicant notes this comment. The EA has provided comment on these matters, and the Applicant has responded with reference to EA014 and EA015 in Table 6 of this document.	[GREEN] HDC has provided more detailed comments on Flood Risk and Drainage in paragraphs 6.147 to 6.154 of the Local Impact Report [REP1-078], including consideration of the Sequential and Exceptions Tests. The applicants' responses to the Environment Agency (references EA014 and EA015) in Table 6 of REP1-055 are noted.
HDC-RR-38	12.2	Amenity	Following a detailed review, the methodology and baseline data are considered acceptable, and proposed limits set out are agreed. The following management plans have been reviewed and should be secured as requirements of the DCO: Outline Construction Environmental Management Plan [APP-155] • Outline Operational Environmental Management Plan [APP-157] • Outline Decommissioning Environmental Management Plan [APP-158]	The Applicant notes this comment and welcomes agreement with HDC on noise and vibration matters. A final CEMP in substantial accordance with the oCEMP [APP-155] is secured by Requirement 5 of the draft DCO [AS-008]. A final OEMP in substantial accordance with the oOEMP [APP-157] is secured by Requirement 9 of the draft DCO [AS-008]. A final DEMP in substantial accordance with the oDEMP [APP-158] is secured by Requirement 18 of the draft DCO [AS-008].	[GREEN] The Council notes the Applicant's response and has no further comments at this stage.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-39	12.3	Amenity	The assessment is considered acceptable and agreed. Dust would be controlled through the outline Construction Environmental Management Plan [APP-155] and the associated Dust Management Plan. In a worst-case scenario, construction dust could pose a medium risk of adverse impacts if unmitigated; however, the proposed mitigation measures would reduce this risk to negligible. Regarding air pollutants such as nitrogen dioxide, it is agreed that potential effects on human health from construction vehicle emissions are not significant. The Considerate Contractor Scheme would be implemented, and it is agreed that its overall significance in relation to air quality effects is not significant.	The Applicant notes this comment and welcomes agreement with HDC on the assessment of air quality impacts and effects.	[GREEN] No response required.
HDC-RR-40	12.4	Amenity	The assessment is considered acceptable and agreed in respect of waste. The outline Waste Management Plan [APP-164] has been reviewed and should be secured as requirement of the DCO. Further comments on waste are deferred to CCC as the Minerals and Waste Planning Authority.	The Applicant notes this comment and welcomes agreement with HDC on the assessment of waste. A final Waste Management Plan in substantial accordance with the oWMP [APP-164] is secured by Requirement 6 of the draft DCO [AS-008] .	The Council notes the Applicant's response and has no further comments at this stage.
HDC-RR-41	13.2	Ground Conditions	It is agreed that intrusive ground investigations would only be required where ground disturbance is proposed. Particular attention should be given to the locations of former buildings, infilled ponds and the former oil pipeline. The CEMP should set out the necessary procedures. The outline Soil Management Plan [APP-161] has been reviewed and should be secured as a requirement of the DCO.	The Applicant notes this comment. The mitigation measures for ground conditions are set out in Table 5.8 of the oCEMP [APP-155] . A final Soil Management Plan in substantial accordance with the oSMP [APP-161] is secured by Requirement 7 of the draft DCO [AS-008] .	[GREEN] The Council notes the Applicant's response and has no further comments at this stage.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-42	14.6	Land and Soils	Responses to Natural England's scoping opinion had outlined how continuation of data collection would be conducted. A subsequent change to the approach adopts a less intensive method than was originally proposed, which for the most part equated to one survey point per 2 ha. However, where impacts were anticipated to be greater (BESS, on-site sub-station and compounds and cable corridors) the standard methodology of 1 sample per hectare was adopted. It is indicated that the revised methodology followed further discussion with Natural England.	The Applicant has previously addressed this comment with reference to BBC-RR-139 in Table 1.	[GREEN] The Applicant's acknowledgement that the extent and intensity of soil survey data would hinder the final detailed Soil Management Plan is welcomed. The Applicant has updated the oSMP to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase. This commitment should be for areas missing any data and to bring survey intensity across the entire site to the standard survey intensity of one sample per hectare.
HDC-RR-43	14.7	Land and Soils	It is not apparent whether the discussions with Natural England extended to the absence of data for an area of land (ungraded) amounting to 5.4 % of the site. Access to this land was not available. The response to the absence of data, for the purpose of the EIA, is to assume a worst-case outcome by assuming the land to be Grade 2. Whilst this enables assessment of project worst-case project effects, the absence of data hinders development of a detailed soil management plan (proposed post consent and to be substantially in accordance with the outline soil management plan). The missing data should also be available for restoration of land, upon decommissioning, to its original condition.	The Applicant has previously addressed this comment with reference to BBC-RR-139 in Table 1.	[GREEN] The Applicant's acknowledgement that the extent and intensity of soil survey data would hinder the final detailed Soil Management Plan is welcomed. The Applicant has updated the oSMP to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase. This commitment should be for areas missing any data and to bring survey intensity across the entire site to the standard survey intensity of one sample per hectare.
HDC-RR-44	14.8	Land and Soils	Discussion recognising that mineral resources would not be sterilised by the scheme is adequately developed and that conclusion is supported.	The Applicant notes this comment and welcomes agreement with HDC on this matter.	[GREEN] No response required.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-45	14.9	Land and Soils	<p>A permanent change of land use in the form of landscaping and habitats, referenced as substantially in accordance with the illustrative outline landscape and ecological management plan, includes approximately 19 ha of native species woodland and 17.4 km of native hedgerows. Table 13.12 acknowledges that the creation of the habitats, which should be considered permanent in respect of areas of woody vegetation, will have adverse impacts from the loss of biomass production (from agricultural land) but potential benefits to soil resources. These permanent effects are not addressed in the presentation of residual effects, including an absence from the summary Table 13.5. The conclusion that the scheme would result in a permanent adverse impact to approximately 5.86 ha does not incorporate the effects of habitat creation.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-140 in Table 1.</p>	<p>[AMBER] The Council considers that it is not the case that woodland and grassland are analogous in respect of permanency. National policy is for woodland retention. Whilst a felling licence may be applied for to remove timber this would be accompanied by conditions for re-establishment of trees. Grubbing out of established woodland is unlikely to be approved for reversion of land to agriculture after a period of 60 years. Furthermore, it would not be solely at discretion of the landowner post-decommissioning. The Council considers that this does not necessarily represent an adverse outcome in terms of all environmental effects but potential benefits are captured elsewhere within the ES. This may include benefits to soil function for inclusion in ES Vol 1 Chapter 13 Land and Soils [APP-049]. Nonetheless, it is also relevant to ES Vol 1 Chapter 13 Land and Soils [APP-049] to capture a permanent reduction in agricultural land use.</p>
HDC-RR-46	14.10	Land and Soils	<p>Assessment of residual effects is summarised by receptor, namely the agricultural land classification (ALC) grade and soil type and mineral reserves. This does not differentiate between the effects of various design elements that resulted in different sampling intensities of land and soil. In this survey approach was recognition that the potential effects of some parts of the scheme were elevated relative to others. It was anticipated that this differentiation would be reflected in section 13.10 presenting</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-141 in Table 1.</p>	<p>[AMBER] The Applicant has responded to the issue of woody vegetation against BBC-RR-140, but it does not reflect policy for protection of woodland and important hedgerows. Decisions on deforestation are made under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999. Applications are managed by the Forestry Commission. Application to the LPA is required for removal of hedgerows under the</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			<p>residual effects. Further breakdown of how the receptor is impacted by various components of the scheme would be expected, particularly to justify the stated low magnitude of impact. The absence of detail has the potential to obscure the extent of effects to Grade 2 and ungraded (potential Grade 2) land. Similarly, the low magnitude effect to Subgrade 3a land yields a minor (not significant) adverse effect but further detail on the extent of land use change was anticipated to justify this conclusion. Magnitude has not incorporated land use change for the creation of permanent woody habitat.</p>		<p>Hedgerows Regulations 1997.</p> <p>The inclusion of permanent land use change from agriculture in areas of woody vegetation should be incorporated within these calculations. Its inclusion has the potential to increase the magnitude of effects from low to medium, in relation to Subgrade 3a land. In so doing, the reported minor (not significant) adverse effect is potentially a moderate adverse (significant) effect.</p>
HDC-RR-47	14.11	Land and Soils	<p>The beneficial effects to soil resources during the operational phase, as the land would not be cultivated and permanent vegetation cover maintained, are acknowledged. The application of magnitude and sensitivity criteria to the assessment to present a significant beneficial effect is likely to be overstated, with the beneficial effect felt by the Host Authorities to be minor and not significant.</p>	<p>The Applicant has previously addressed this comment with reference to BBC-RR-142 in Table 1.</p>	<p>[AMBER]</p> <p>The Council considers that improvement to soil resources is possible during the operational phase. However, it contends that the calculation of a moderate beneficial effect to soil resources applies an overly simplified algorithmic approach which makes certain assumptions. It is assumed that improvement builds on the existing baseline conditions. Baseline conditions post-construction may require a recovery period to return to the existing baseline. The Applicant is selecting a long-term outcome (to be realised principally toward the end of the operational phase), and the benefit is not reflective of the whole operational phase. As such the Council continues to consider this benefit to have been over-stated by the Applicant</p> <p>There is insufficient data presented in ES Vol 1 Chapter 13 Land and Soils [APP-049] to support the claim for a moderate (significant) benefit. The</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
					Applicant's proposal and advocacy for the 'Agrisolar Research Area' reflects the uncertainty over this claim.
HDC-RR-48	14.12	Land and Soils	Notwithstanding concerns over missing data and more detailed analysis of how scheme components result in adverse effects, the overall conclusions broadly meet professional judgement regarding the significance of residual effects. However, the significant benefit to the soil resource from resting the land from arable agriculture is considered overstated.	The Applicant has previously addressed this comment with reference to BBC-RR-143 in Table 1.	[GREEN] It remains the case that despite different considerations over how the calculation of permanent land use change of BMV land should be presented, the total area of permanent loss is limited. The Council accepts that the applicant recognises that limited positive weight should be afforded to the condition of soils following the operational phase.
HDC-RR-49	14.13	Land and Soils	The use of embedded mitigation in preparation of a soil management plan (including records of soil movements and storage) is recognised. Additional missing information on soils and ALC grade is required for completion of a pre-construction detailed soil management plan. The statement that further mitigation, beyond the good practice measures of the soil management plan, is not practicable is acknowledged.	The Applicant has previously addressed this comment with reference to BBC-RR-144 in Table 1.	[GREEN] The commitment by the Applicant to undertake additional surveys, to provide currently missing information on soils and land, is welcomed. This would provide additional detail on soil type and sensitivity and enable assessment of ALC grades using the standard methodology. The updated wording of paragraph 8.1.4 of the oSMP provides reassurance that construction work could not be undertaken before the data are obtained and a detailed Soil Management Plan agreed.
HDC-RR-50	15.4	Socio Economics	Socio-economics, Land-use and Tourism matters are considered within Chapter 14 of the ES [APP-050]. The development has the potential to impact the economy, and land-use and tourism receptors through; land-take arising from construction activities and for operation of the project; worker requirements during all phases; changes in access to facilities during construction	The Applicant has previously addressed this comment with reference to BBC-RR-145 in Table 1.	[GREEN] No response required.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
			and decommissioning, and; when any of these impacts act in-combination with those from other developments. Effects will principally arise from employment and related impacts during construction and decommissioning and on journeys both for recreation and accessing services and facilities.		
HDC-RR-51	15.5	Socio Economics	All Socio-economics, Land-use and Tourism matters raised by the Planning Inspectorate in its Scoping Opinion are considered to have been addressed in the ES with the exception of the following with the Host Authorities comments on this provided in this representation: a) ID 3.7.3 Effects on local services	The Applicant notes this comment and has addressed this point in our response to HDC-RR-55 below.	[GREEN] No response required.
HDC-RR-52	15.6	Socio Economics	The development has been assessed by the Applicant as resulting in a significant moderate beneficial effect on the economy at the local level and a not significant minor beneficial effect at a regional level during construction and decommissioning. The Applicant assesses economic impacts in relation to 30-minute and 90-minute drive times from the Site as explained at Paragraph 14.4.6. However, which constitutes a local and a regional level of impact for the purpose of the assessment is not explained. Estimated employment creation is presented for a 90 minute drive time only, with no further breakdown provided to confirm the scale of employment creation within a 30 minutes' drive time, which would, from the Host Authorities perspective, constitute local impact. For a significant moderate beneficial local economic	The assessment of employment effects in ES Vol 1 Chapter 14 [APP-050] is based on functional economic areas, consistent with national infrastructure assessment principles and relevant guidance. For this reason, "local" is defined as the area within a 90-minute drive-time Travel-to-Work Area (TTWA) - a realistic reflection of the labour catchment for a project of this nature and scale. "Regional" refers to the East of England standard region, and "national" to the UK. As noted in paragraph 14.4.6 [APP-050] , a 30-minute drive-time area was also examined to consider whether there were meaningful socio-demographic or economic differences that would require separate analysis. However, both zones were found to consist of small and medium-sized settlements in a broadly rural context, with no distinct socio-economic divergence warranting a different treatment with the 30-	[AMBER] The Council welcomes the clarification provided by the Applicant in respect to the geographic scale at which economic effects of the Scheme constitute local and regional impacts. The Council accepts the Applicant's justification that local impacts can be attributed within a 90-minute drive-time Travel-to-Work Area and is not seeking to see employment impacts disaggregated further. However, the Council considers that the need for specialist skills is likely to necessitate a significant degree of employment from outside of this study area, and, coupled with the demand for these skills likely coinciding with needs arising by a number of other solar PV developments within the same area, it considers that the moderate beneficial effect

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			effect to be realised as concluded in Chapter 14 of the ES, appropriate provision must be made in the DCO to deliver employment and skills benefits/opportunities locally.	minute zone included for illustrative purposes. While spatially fixed receptors including land and local business and community assets have been assessed at the district level, employment effects are driven by a mobile workforce and a dispersed supply chain. Disaggregating employment impacts by administrative boundary would risk introducing artificial precision not supported by evidence. The adopted approach is proportionate, policy-aligned, and appropriate for the national significance of the Scheme. The Applicant has prepared an outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163] which sets the framework for delivering employment and skills benefits locally.	concluded by the Applicant is overstated. Notwithstanding this the Council considers that if appropriate provision is made in the DCO to deliver employment and skills benefits/opportunities locally then the Council considers that a beneficial economic effect could be realised.
HDC-RR-53	15.7	Socio Economics	An outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163] sets out the Applicant's strategy to maximise local employment, skills development and supply chain opportunities. This lacks specific detail with regards to existing local skills gaps and current levels of provision, and on specific initiatives which are tailored to addressing local employment issues and need. Detail of these should be provided in the document along with informed measures and outputs for delivering appropriate local employment and skills benefits/opportunities. A route map for developing the oSSCEP further should also be provided, including setting out when stakeholder engagement is needed and how it will take place.	The Applicant notes that the outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163] has been submitted at outline stage to establish the overarching framework and commitments for maximising local employment, skills development and supply chain opportunities. ES Vol 1 Chapter 14 [APP-050] provides details relating to the local economy, labour market and employment baseline conditions, which have informed the oSSCEP. Requirement 19 of the draft DCO [AS-008] secures the submission of a Skills Supply Chain and Employment Plan (SSCEP), following consultation with the relevant local planning authorities, prior to commencement of construction. The detailed SSCEP will include further analysis of local skills gaps and provision, identification of tailored initiatives, measurable outputs, and a clear programme for stakeholder engagement, thereby providing the route map sought by	[AMBER] As explained in its response to the Applicant's response to HDC-RR-52, the Council considers that for the moderate beneficial effect on the local economy attributed by the Applicant to be realised appropriate provision must be made in the DCO to deliver employment and skills benefits/opportunities locally. Whilst the Council continues to welcome the inclusion of an Outline Skills Supply Chain and Employment Plan (oSSCEP), it considers that, even as an outline document, it 1) lacks necessary reference and detail to local skills gaps, existing provision of skills training and specific initiatives that would be addressed/used by the Applicant and its contractors 2) specific measures and outputs for delivering employment and skills benefits/opportunities. Without such information the Council contends

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
				the Council.	that the potential for the Scheme to have positive economic benefits for its residents is not fully supported by the oSSCEP. It requests that the Applicant updates its oSSCEP with such details for the Council's consideration of this matter within the Examination.
HDC-RR-54	15.8	Socio Economics	<p>The development has been identified as resulting in negligible effects on tourism during all phases. This includes in respect of impacts on users of Public Rights of Way. Mitigation measures in the outline Public Rights of Way Management Plan [APP-160] are referred to which would limit impacts. Paragraph 14.4.19 states that effects on PRoW are considered in relation to recreational and tourism use. However, no assessment of impacts on journey length and duration by residents for recreation has been presented, only impacts on tourism-related PRoW use. The Host Authorities consider that an assessment of impacts on all users of PRoWs should be provided to confirm that no significant effects would arise. HDC reserves the right to make further comment on the potential effect on tourism of the proposed development, subject to additional data gathering.</p>	<p>The Applicant notes that access and connectivity impacts are assessed under ES Vol 1 Chapter 9 Traffic and Transport [APP-045], and that the ES does not rely solely on a tourism-related assessment of PRoW users.</p>	<p>[GREEN]</p> <p>The Applicant's response is noted. Whilst impacts on recreational use of PRoWs are not specifically considered in ES Vol 1 Chapter 9 Traffic and Transport measures proposed by the Applicant would likely limit and minimise any impacts on use by residents for this purpose. Overall the Council is content that this matter is addressed.</p>

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-55	15.9	Socio Economics	Impacts on local services have been addressed in respect of effects on the visitor accommodation sector from potential use of these facilities by construction workers. Effects on other services have not been identified in the ES. The Host Authorities consider there to be potential for effects in terms of severance of access to facilities, subject to the completion and findings of junction counts and assessments requested in Section 9 of this representation. The Host Authorities consider there to be the potential for impacts on healthcare services, and request that the Applicant provides information if no impacts are expected justifying why this will be the case, with reference to any mitigation measures as appropriate. This is particularly important in light of the absence of a Health chapter in the ES or Health Impact Assessment, which the Host Authorities would also like to have seen in the Application to demonstrate that their residents health and wellbeing would not be adversely impacted by the Scheme during all phases of development.	Paragraph 14.6.32 of ES Vol 1 Chapter 14 [APP-050] identifies that there are no relevant primary care facilities within the proximity of the Order limits to be considered. ES Vol 1 Chapter 16 [APP-052] includes at Section 16.2 an assessment of the potential impacts of the Scheme on human health. The Applicant notes that the assessment in ES Vol 1 Chapter 16 [APP-052] has been reviewed by Cambridgeshire County Council, with their comments and the Applicant's responses set out with reference to CCC-RR-71 to CCC-RR-85 in Table 3 of this document.	[AMBER] The Applicant's response is noted. However this appears to be contradicted by Table 14.19 which indicates that Great Staughton Surgery is within 300m of the Order Limits. The Council therefore requests that the Applicant provides information, if no impacts on this community facility are expected, justifying why this will be the case, with reference to any mitigation measures as appropriate.
HDC-RR-56	15.10	Socio Economics	There are some apparent errors and/or inconsistencies in application of the assessment methodology by the Applicant for some aspects. These will be explained in more detail in the Local Impact Report.	The Applicant notes this comment.	[GREEN] No response required.
HDC-RR-57	16.6 (i)	Climate Change	The assessment should explicitly recognise that the receptor for the GHG assessment is the global climate. This is implied but not stated.	The Applicant has previously addressed this comment with reference to Point a) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-58	16.6 (ii)	Climate Change	The replacement frequency of components such as battery modules has the potential to affect the embodied emissions during the operational phase of the Proposed Development, and the impact of shorter life expectancies than those assumed should be considered.	The Applicant has previously addressed this comment with reference to Point b) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.
HDC-RR-59	16.6 (iii)	Climate Change	The consumption of imported grid electricity during the operational phase has not been considered; the emissions impact is likely to be negligible in the overall context of the Scheme's whole life GHG impact, but it should be included for completeness.	The Applicant has previously addressed this comment with reference to Point c) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.
HDC-RR-60	16.6 (iv)	Climate Change	The possibility of peat being discovered during the construction phase is acknowledged, but there is insufficient detail on the approach that the Applicant would take in this eventuality. The presence of peat within the site has the potential to substantially increase the GHG impact from land use change, so it is important that there is more clarity around any future peat management methodology.	The Applicant has previously addressed this comment with reference to Point d) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.
HDC-RR-61	16.6 (v)	Climate Change	The use of the BESS in a grid balancing capacity has the potential to make further GHG impacts through the displacement of fast response, gas fired peaking plant. Any savings so achieved would generally fall outside the scope of the core GHG assessment, but a discussion of the potential benefits would be useful. The December 2025 update to the National Policy Statement for nuclear energy generation (EN-7) should be taken into account in this respect.	The Applicant has previously addressed this comment with reference to Point e) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-62	16.6 (vi)	Climate Change	The use of existing, unabated CCGT generating capacity as a counterfactual scenario is noted and broadly accepted, but PINS has been unwilling to accept the counterfactual use of CCGTs in previous planning decisions and the Beneficial evaluation of significance is contingent on this approach. The impact on the evaluation of significance in the event of PINS not agreeing with this approach should be more fully considered.	The Applicant has previously addressed this comment with reference to Point f) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.
HDC-RR-63	16.6 (vii)	Climate Change	The Beneficial evaluation of significance means that embedded GHG mitigation measures have not been considered necessary; the Host Authorities would note that suitable GHG mitigation measures across all phases of the Scheme should always be considered and secured by the DCO if found practicable.	The Applicant has previously addressed this comment with reference to Point g) in BBC-RR-154.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.
HDC-RR-64	16.8	Climate Change	In reference to the CCRA, an inconsistent use of historic climate data is apparent. The current baseline uses data for Bedford for the period 1991-2020 while the future baseline uses data for the same location from 1981-2010. This inconsistency is unlikely to compromise the overall outcome of the CCRA, but it should be addressed.	The Applicant has previously addressed this comment with reference to BBC-RR-155.	[GREEN] The Applicant's response is welcomed and the Council is content that this matter is addressed.

Applicant Ref.	HDC RR Ref.	Theme	HDC Comments from Relevant Representation [RR-494]	Applicant Response to Relevant Representation [REP1-055]	HDC Comments on Applicant Response
HDC-RR-65	17.2	Cumulative Effects	The long and short list of 'Other Developments' is supported, however the status of High Wood Solar (HDC ref. 22/01813/FUL; BBC ref. 22/01998/MAF) should be updated on the Short List [APP-068] to reflect that a decision has been issued.	The Applicant notes this comment and welcomes agreement from HDC on the scope of 'other developments' assessed in ES Vol 1 Chapter 17 Cumulative and In-Combination Effects [APP-053] . The Applicant notes that a decision on the High Wood Solar development has been issued, however this would not affect the assessment or conclusions made in ES Chapter 17 [APP-053] .	[GREEN] The Council notes the Applicant's response and has no further comments.
HDC-RR-66	17.3	Cumulative Effects	Cumulative and in-combination effects are a key consideration given that there are a number of existing and approved solar developments and a BESS scheme in the surrounding area (falling within both HDC's and BBC's administrative boundaries). This Scheme, High Wood Solar Farm, and the existing Staughton Airfield Solar Farm would increase the concentration of solar development in this part of the Southern Wolds LCA, which is acknowledged in the Applicant's ES.	As noted in HDCs comment, the Applicant has assessed the cumulative impact of the various operational, consented and emerging solar developments on the Southern Wolds LCA in ES Vol 1 Chapter 17 Cumulative and In-Combination Effects [APP-053] .	[GREEN] The Council notes the Applicant's response and has no further comments.
HDC-RR-67	17.4	Cumulative Effects	High Wood Solar Farm (HDC ref. 22/01813/FUL; BBC ref. 22/01998/MAF) is immediately adjacent to Site D (southern boundary of Site D abuts High Wood's northern boundary), and Site C lies ~0.7 km north-west of High Wood at its nearest point. High Wood is the primary cumulative scheme considered across all topic areas in the ES due to its proximity and potential overlap for all phases (construction, operational and decommissioning) which is supported.	The Applicant notes this comment.	[GREEN] No response required.

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HDC-RR-68	18.1	Draft DCO	HDC will provide detailed comments on the draft DCO [APP-016] in due course. The key issues for focus will include the scope of the authorised development, the schedule and drafting of requirements. HDC expect their views on the drafting and approvals process for DCO requirements to be given significant weight in their role of ensuring that the impacts upon our local environment and communities are minimised, and as an approving and enforcement authority. HDC will also provide further detailed comments on the submitted Outline Management Plans [APP-155 to APP-167] where appropriate.	The Applicant notes this comment.	[GREEN] No response required.
HDC-RR-69	18.2	Draft DCO	It is noted that the Applicant is committing to delivering 70% net gain in area-based habitat units, 30% net gain in hedgerow units and 5% in watercourse units, a proportion of which will fall within HDC's administrative boundary. The Council has recently introduced fee charging for BNG monitoring on planning applications. It will therefore seek to ensure that an appropriate fee is set for monitoring BNG, ecology and landscape mitigation works in respect of the project should the responsibility for this duty fall upon HDC. We expect that as this will involve a financial element a Section 106 Agreement will be required.	The Applicant notes this comment but as the Scheme is not subject to mandatory BNG, does not consider that a Section 106 agreement is appropriate. The Applicant will continue to engage with the host authorities regarding a post-consent planning performance agreement or other funding mechanism to support the host authorities in engaging with the 'steering group' set out at paragraph 8.1.4 of the oLEMP [APP-159].	[AMBER] HDC has addressed this point further in paragraph 6.105 and 6.106 of the Local Impact Report [REP1-078]. HDC maintains that an appropriate fee is secured for the ongoing monitoring of BNG as well as ecology, and landscape mitigation works. This would need to be secured either through a Section 106 agreement or via the proposed Landscape and Ecological Management Plan Steering Group mechanism outlined in section 4.2 of the oLEMP.

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HDC-RR-70	18.3	Draft DCO	Financial provisions to ensure the funding and delivery of the strengthened and supplemented landscape character post-operation as per Design Principle 7 and as shown on the landscape Illustrative Environmental Masterplan will be required within the Section 106 agreement, potentially to include a bond or other insurance-backed funding guarantee.	The Applicant has set out a response in relation to the retention of the proposed planting at decommissioning with reference to BBC-RR-32 in Table 1. Following decommissioning, the responsibility for any planting will be returned to the landowners. The Applicant does not consider a Section 106 agreement, bond, or other insurance-backed funding guarantee to be necessary or appropriate for the post-decommissioning phase once the land is returned to landowners.	[AMBER] The Council notes the Applicant's response regarding post-decommissioning arrangements and notes the position that responsibility for planting and landscape measures would revert to landowners, with no Section 106 agreement or other secured mechanism proposed. Where post-decommissioning retention of landscape and environmental enhancements is not secured or otherwise clearly confirmed, HDC considers that such measures should not be afforded full weight as planning benefits in the overall planning balance.
HDC-RR-71	19.1, 19.2	Community Benefits	Although Community Benefits are not a material planning consideration, HDC and other host authorities intend to work with affected parishes on a suitable mechanism for collecting and implementing a community benefit fund as a means by which to secure benefits if the project receives consent. The amount currently being offered by the applicant (£400 per MW per year) is noted. Negotiations on a community benefit are expected to continue alongside the planning process and will be supplemental to any section 106 agreement required to mitigate the adverse impacts of development.	The Applicant is committed to providing a Community Benefit Fund. The Applicant will continue to engage with the host authorities about the most appropriate mechanism to secure this.	[GREEN] No response required.

Table 2. Huntingdonshire District Council's comments on updated or additional documents from the applicant

Topic	Paragraph/page number	Comment
Environmental Statement Vol 2 Appendix 7 1 Ecological Baseline Report (Tracked) P02 [REP1-025]		
Ecology	For example: paragraph 2.3.2	Several updated references to areas of limited access being shown in ES Volume 3 Figure 3 (EN010141/DR/6.3). However, this does not appear to be provided as an amended document. Applicant to clarify if this document has been updated.
Environmental Statement Vol 2 Appendix 7 5 Great Crested Newt Presence or Absence Survey Report (Tracked) P02 [REP1-027]		
Ecology	Table 2.1 and paragraphs 2.1.3 and 2.1.4	The Council welcome the addition of Pond 46 (no access) to Table 1 and updated reference to pond numbers in paragraphs 2.1.3 and 2.1.4 to reflect this change.
Outline Construction Environmental Management Plan (Tracked) P02 [REP1-033]		
Ecology	Table 5.3 (Watercourses)	Clarification that watercourses to include a minimum 10 buffer from bank top is welcomed.
Ecology	Table 5.3 (Hedgerows)	In order to ensure that the 6m hedgerow buffer is dealt with in as a minimum the Council request the following rewording in Table 5.3 page 41: <i>'Hedgerows to include a minimum 6m buffer, extending beyond this to include the full root protection zone for retained trees where this extends beyond 6m, and excluding any locations where points of widening or crossing points, in which no works (other than landscaping) are to occur'</i>
Ecology	Appendix B Ecology Reasonable Avoidance Measures	The Council welcomes the addition of the outline Reasonable Avoidance Measures method statements as an Appendix to the oCEMP. These measures should be reviewed and approved by the Council before construction commences.
Climate Change	Table 5.11, p64	Release of greenhouse gas emissions during construction: <ul style="list-style-type: none"> • Consideration should be given to using biofuels, e.g. HVO, in construction equipment to minimize emissions from plant use • Adopt the carbon reduction hierarchy during the design process, applying innovative design techniques to reduce the embodied carbon content of materials and components, as well as sourcing lower-carbon materials as stated • Specify SF6-free switchgear and other components, or ensure that any GIS equipment is sealed for life to minimize any fugitive emissions of SF6 • Take steps to reduce emissions from worker travel by incentivizing lower-carbon travel modes and the use of EVs.
Outline Operational Environmental Management Plan (Tracked) P02 [REP1-037]		
Climate Change	Table 5.11, p52	Take steps to reduce emissions from worker travel by incentivizing lower-carbon travel modes and the use of EVs. Consider using biofuels, e.g. HVO, in any plant used during routine operations or operational maintenance.
Outline Decommissioning Environmental Management Plan (Tracked) P02 [REP1-039]		

Topic	Paragraph/page number	Comment
Ecology	Table 5.3	The Council welcomes additional wording to future proof ecology requirements through adherence to subsequent equivalent standards.
Landscape and Visual	paragraph 2.4.3	Please consider the inclusion text to align with the comment below for the oLEMP Section 7.0 in relation to post-decommissioning hedgerow heights.
Outline Landscape and Ecological Management Plan (Tracked) P02 [REP1-041]		
Ecology	paragraph 3.4.1	Clarification that watercourses to include a minimum 10 buffer from bank top is welcomed.
Ecology	paragraph 3.6.1 and 3.6.2	The revised minimum net gain targets are noted, alongside the commitment to maximized BNG as far as practicable. Given the scale of the scheme it is unclear why only a minimum 5% for watercourses is targeted. To align with local and national guidance the Council request the Applicant is held to a minimum 10% in relation to watercourse units.
Ecology	paragraph 5.3.35 and paragraph 5.3.40	The Council welcome the addition of pre-construction soil sampling to inform establishment method and seed mixes, and the use of yellow rattle and scarification where appropriate. The Council request confirmation baseline data from soil sampling will be provided to the Council when seeking their approval of the final LEMP prior to construction.
Ecology	Appendix C Outline Farmland Bird Mitigation Strategy (General)	The Council welcome the provision of the Outline Farmland Bird Mitigation Strategy (oFBMS) and its securing through inclusion within the oLEMP (itself a control document).
Ecology	Appendix C Outline Farmland Bird Mitigation Strategy (General)	The Council request that a table is included in the oFBMS to summarise the losses and gains.
Ecology	Appendix C Outline Farmland Bird Mitigation Strategy (Paragraph 5.2.4)	The Council welcome commitment to the creation of grassland habitats north of Site C in advance of works commencing on Site A. However, the Council request further detail on when the other areas of mitigation are expected to be provided relative to the overall construction programme. In addition, the Council request the oFBMS quickly reflects the need for both the habitats to be both created and established sufficiently to fulfill their intended bird mitigation purposes in advance of the first season their use is assumed within the mitigation strategy.
Ecology	Appendix C Outline Farmland Bird Mitigation Strategy (General)	The Council request clarification on how Public Rights of Way (PRoW) have been considered in the development of the oFBMS. In particular, within the 125ha area assumed to form mitigation for ground nesting birds.
Ecology	Appendix C Outline Farmland Bird Mitigation Strategy (General)	The oFBMS sets out the areas of habitat creation proposed, however it is not currently clear within the strategy what suitability (if any) these habitats have for the species of interest. It is not currently clear if the figures for habitat creation provided amount to areas of additional habitat creation, or if some represent enhancement of areas that are already utilised by these species. The Council request:

Topic	Paragraph/page number	Comment
		<ul style="list-style-type: none"> • A clear summary of the losses and gains in suitable habitat (in ha) • Further information to confirm the existing value of the areas identified for habitat creation for the target species
Ecology	Appendix C Outline Farmland Bird Mitigation Strategy (Section 6)	<p>Current monitoring proposals in relation to habitats and bat boxes outlined in Section 6 are welcomed. However, for a scheme with impacts of this scale bird monitoring surveys (replicating those undertaken during the baseline) are considered appropriate. These surveys will be necessary to demonstrate that the mitigation measures set out in the oFBMS are proving effective and objectives set out are being met.</p> <p>The Council request that that these are included within the oFBMS and cross referenced alongside wider species monitoring requirements in the oLEMP.</p>
Landscape and Visual	paragraph 3.4.1	<p>Please clarify if the 10m buffer between the fenceline of the solar farm and the public right of way is to the edge of the public right of way or to the centre line? The Council would request a 10m buffer to the edge of the public right of way.</p> <p>Section 7.0 –It is recommended that a review of post operation hedgerow heights is undertaken to deal with the loss of openness in views and change in landscape character arising from tall hedgerows. It is accepted that this is an appropriate mitigation in operation, but the Councils considers that a more appropriate agriculturally based management regime of lower hedgerows (approximately 1.5m) should be implemented on a rotational basis post operation. Please include a statement that aligns with the above.</p>
Outline Soil Management Plan (Tracked) P02 [REP1-045]		
Land and Soils	8.1.4 Further Site Investigations	<p>The additional commitment to further agricultural land classification and soil resource surveys to be undertaken post-consent is recognised. That the surveys would be prior to commencement of construction to inform the detailed Soil Management Outline Soil Management Plan is important. This will include surveying any land currently identified as ‘Ungraded’ due to access limitations and undertaking additional survey work across the remainder of the Order limits to achieve an observation density of approximately one survey point per hectare. The results of these surveys will be used to validate ALC grading and to refine the detailed SMP measures for stripping, segregation, storage and reinstatement of soils.</p> <p>No further developments of the oSMP were proposed or provided.</p>
Biodiversity Net Gain Report (Tracked) P02 [REP1-053]		
Biodiversity Net Gain	Biodiversity Net Gain Report – para 4.1.3	<p>The Council requests that a post-development BNG figure is provided showing infrastructure alongside proposed habitats, to demonstrate how the assessment has been derived.</p>