EAST PARK ENERGY

East Park Energy

EN010141

Applicant Response to Local Impact Reports

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EAST PARK ENERGY

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1.0 INTRODUCTION

1.1 Overview

1.1.1 This document sets out the responses of BSSL Cambsbed 1 Limited ('the Applicant') to the three Local Impact Reports (LIRs) submitted in relation to the Development Consent Order (DCO) application for the East Park Energy project (the 'Scheme').

1.2 Purpose of this Document

1.2.1 The purpose of this document is to provide the Applicant's responses to the LIRs submitted by each of the three host local planning authorities (the 'Host Authorities').

1.2.2 The Host Authorities were invited to submit LIRs in accordance with Section 60 of the Planning Act 2008, and the Examining Authority's (ExA's) Rule 8 Letter **[PD-006]** set the deadline for their submission as Deadline 1 on 7th April 2026.

1.2.3 The following LIR's were submitted at Deadline 1:

- Bedford Borough Council (BBC) LIR **[REP1-071].**
- Huntingdonshire District Council (HDC) LIR **[REP1-078].**
- Cambridgeshire County Council (CCC) LIR **[REP1-075]**.

1.2.4 This response is issued at Deadline 2 (28th April 2026), in accordance with the ExA's Rule 8 Letter.

1.3 Document Structure

1.3.1 This response document is structured as follows:

- Section 2.0 – A tabulated response to BBC's LIR
- Section 3.0 – A tabulated response to CCC's LIR
- Section 4.0 – A tabulated response to HDC's LIR

1.3.2 The documents submitted with the DCO Application are referenced using the reference number assigned by the Planning Inspectorate (PINS) i.e. **[APP-XXX]** or **[REP1-XXX]**. Where application documents have been updated based on feedback received at Deadline 1, this response document sets out that the relevant updated document is "**[as updated alongside this submission]**".

1.4 Note about National Policy Statements

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

1.4.2 All references to the NPSs in this document made by the Applicant are to the 2024 NPSs unless stated otherwise.

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

1.5 Applicant's Approach to this Document

1.5.1 The Applicant notes that the Host Authorities have approached the production of their LIR's in differing ways. BBC have prepared their LIR as an extension of their Relevant Representation (RR) **[RR-111]** and the Council's LIR retains the comments they made at the RR stage, together with a series of further comments intended for this stage of the examination. Both CCC and HDC have prepared their LIR's as separate, stand-alone documents which expand upon the comments they made in their RR's. In light of this, the Applicant has elected to provide a tabulated response to each Council's LIR with the aim of obtaining a common position on each. The tabulated response to BBC's LIR, provides a response to their LIR specific comments, but also re-addresses the comments from their RR's submission. The Applicant has taken that approach to ensure that they provide a comprehensive response to all matters

in the LIR's and to avoid the need for significant cross referencing between submitted documents.

1.5.2 There are areas of repetition within the LIR's and in order to avoid unnecessary repetition, the Applicant has, only substantively addressed each point once within their submission.

1.5.3 It is noted that, at this stage, none of the Host Authorities have attempted to establish a planning balance in connection with the scheme (an approach the Applicant agrees with). However, all have provided initial views on the overall local impact of the scheme before and after mitigation. Wherever possible, the Applicant has sought to provide confirmation as to whether they agree or disagree with the Council's assessment of each matter and / or whether they agree with the suggested mitigation. Some of these matters will need to be the subject of further dialogue between the Applicant and the Host Authorities during examination and following the submission of further information to the examination. However, the Applicant is hopeful that, by continuing their positive dialogue with all three Host Authorities, they will be able to resolve the vast majority by the end of the examination process. This will be encapsulated in the final Statements of Common Ground (SOCG's).

2.0 RESPONSE TO BEDFORD BOROUGH COUNCIL'S LIR

Table 1: Response to Bedford Borough Councils Local Impact Report (REP1-071)

Para Ref.	BBC Local Impact Report Comment	Applicant Response
Executive Summary		
2.1	Over the last circa 24-month period, the three Host Authorities, namely Bedford Borough Council, Cambridgeshire County Council (CCC), and Huntingdonshire District Council (HDC), have engaged from pre-application stage discussions with the Applicant to review emerging material, inform the Applicant of local planning policy and contextual matters, and have engaged with technical disciplines where necessary, to inform the DCO Application and Examination.	The Applicant welcomes acknowledgement of the engagement that has been carried out up to and including submission and hope to continue positive engagement with the Host Authorities through the Examination process.
2.3	As set-out in the Council's Relevant Representations and this Local Impact Report, while the Council does not object to the DCO Application in principle, there are and remain aspects and matters of both significant concern, and which, the Council submits, require clarification that will need to be addressed by the Applicant to allow the Council to fully understand the impact of the Proposed Development and to form a view as to whether the mitigation and other measures as proposed are sufficient to address the harm and impacts as identified. The Council seeks that these are to be raised and resolved by way of the Examination and ahead of any consent and binding agreements that may be given to the Proposed Development.	The Applicant welcomes the fact that BBC have no in-principle objection to the Scheme. They prepared responses, clarifications and updated information for submission alongside their response to the Council's Relevant Representations (Submitted at procedural Deadline 1) in addition to further submissions for Deadline 2. The Applicant hopes that the further information and clarifications can address many of the matters the Council would like the applicant to address during Examination.
3.4	It should be noted that various solar farms have either been constructed, or are consented within the immediacy of the Site, which is/will changing the reading of this traditional rural landscape.	The Applicant is aware of the existing and planned solar farm developments in the area and, indeed, other planned development in the Zone of Influence (ZoI) for the Scheme.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Consequently, the Application's effect should be read alongside the broader cumulative impact that such large-scaled developments are having on the collective landscape setting, but also in terms of changes and impacts to existing habitats and habitat corridors.	Any existing Solar development within 10km of the Order Limits have been included in the baseline for the purposes of assessing environmental effects. Other planned development has been assessed as part of the cumulative effects assessment undertaken in **ES Vol 1 Chapter 17 Cumulative and In Combination Effects [APP-053]**. This includes an update to the long listing for the Cumulative effects assessment, which was prepared and submitted by the Applicant at Deadline 1 **[REP1-015**]. The latter has also been the subject of a further review prior to Deadline 2 to ensure any further planning applications referenced by the Host Authorities in the LIR's have been addressed. Most of the schemes identified by the Host Authorities were either already identified by the Applicant in their updated long list submitted at Deadline 1 or not relevant for assessment following the methodology for assessment of cumulative effects. Those schemes that are genuinely new have been added to the long list of potential cumulative schemes. None have been carried forward for shortlisting or more detailed assessment. An updated Long List and associated plan has been submitted for procedural Deadline 2, alongside this response to the LIR's. The Applicant is satisfied that they have carried out a full and comprehensive assessment of significant effects against the existing baseline and in the context of cumulative effects from other planned development.
3.7	In terms of Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990) a local planning authority should have regard to their Development Plan so far as material to an application; and, regard to any other material considerations. In accordance with the NPPF paragraph 2, the Development Plan for the Council comprises:	The Applicant agrees that this is the relevant Local Development Plan. Each development plan document has been the subject of assessment in the Applicants **Policy Compliance Document (PCD) [as updated alongside this submission].**

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	a) The Bedford Borough Local Plan 2030 (adopted January 2020); b) The saved policies of the Allocations and Designations Local Plan 2013 (as at January 2020); and, c) c) The Minerals and Waste Local Plan: Strategic Sites and Policies (adopted January 2014).	
3.8	The Bedford Borough Local Plan 2030 (2020) – applicable policies: • LP2S Healthy communities (clauses (i) and (ii)) • LP3S Spatial strategy (clauses (viii) and (ix)) • LP7S Development in the countryside (clauses (v), (vi), (vii), (viii), (ix), (xi), (xii) and (xiii)) • LP28S Place making (clauses (i), (ii), (iii), (iv), (v), (vi) and (viii)) • LP29 Design quality and principles (clauses (i), (ii), (iii), (iv), (v), (vi), (vii) and (viii)) • LP30 The impact of development – design impacts (clauses (i) and (ii)) • LP31 The impact of development – access impacts (clauses (i), (ii), (iii) and (iv)) • LP32 The impact of development – disturbance and pollution impacts (clauses (i), (ii), (iii), (iv), (v) and (vi)) • LP33 The impact of development – infrastructure impacts • LP35S Green Infrastructure • LP37 Landscape character (clauses (i), (ii), (iii), (iv), (v) and (vi)) • LP38 Landscape in new development (clauses (i), (ii), (iii), (iv), (v), (vi), (vii) and (viii) • LP39 Retention of trees (clauses (i), (ii), (iii), (iv) and (v)) • LP40 Hedgerows • LP41S Historic environment and heritage assets (clauses (i), (ii), (iii), (iv), (v), (vi), (vii) and (viii)	Some of the Local Plan policies the Council considers to be relevant to the application were not specifically addressed by the applicant in their response to the **Policy Compliance Document [as updated alongside this submission]** including: • Policy 2S Healthy communities (clauses (i) and (ii)) • Policy 7S Development in the countryside (clauses (v), (vi), (vii), (viii), (ix), (xi), (xii) and (xiii)) • Policy 53 Development layout and accessibility (clauses (ii) and (iii)) • Policy 86 Delivering infrastructure It is agreed by the Applicant that: • Policy 2S clause (ii) is a relevant consideration. Clause (i) is not relevant as it relates to plan making • Policy 7S Development in the countryside (clauses (v), (vi), (vii), (viii), (ix), (xi), (xii) and (xiii)) are relevant • Policy 53 clauses (iii) may be relevant. However, the policy is clearly not aimed at a development of this type, with the focus instead being on occupied development like housing or businesses. • Policy 86 Delivering infrastructure may also be of limited relevance but only in so far as there is a need for any planning obligations to support the Scheme In recognition of the above, the Applicant has prepared an update of their **Policy Compliance Document (PCD) [as updated alongside this submission].** to respond to the policies or parts thereof listed above.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	• LP42S Protecting biodiversity and geodiversity • LP43 Enhancing biodiversity (clauses (i), (ii) and (iii)) • LP46S – Use of previously developed land and use of undeveloped land • LP47S Pollution disturbance contaminated land (clauses (i), (ii), (iii), (iv), (v) and (vi)) • LP49 Waste (clauses (i), (ii), (iii) and (iv)) • LP50S Water resources • LP51S Climate change strategic approach • LP52 Water demand • LP53 Development layout and accessibility (clauses (ii) and (iii)) • LP56 Renewable energy - broad locations • LP57 Renewable energy general impact (clauses (i), (ii), (iii), (iv), (v), (vi), (xi), (xii), (xiii), (xiv) and (xv)) • LP86 Delivering infrastructure • LP88 Impact of transport on people, places and environment (clauses (ii), (iii), (v) and (vi)) • LP91 Access to the countryside (clauses (i), (ii), (iii), (iv), (v), (vi), (vii), (viii) and (ix)) • LP92 Flood risk (clauses (i), (ii), (iii), (iv), (v), (vi) and (vii)) • LP93 Sustainable drainage systems (SUDs) (clauses (i), (ii), (iii), (iv), (v), (vi) and (vii)) •	
3.9	The Allocations and Designations Local Plan (as at January 2020) applicable policies: a) AD1 Sustainable Development Policy (clauses (i) and (ii)) b) AD36 Pedestrian routes c) AD39 Cycling	Policy AD39 has not been specifically addressed by the Applicant in their **Policy Compliance Document [as updated alongside this submission].** It is agreed by the Applicant that it is a relevant consideration and it has been included in the updated Policy Compliance Document, submitted alongside this response to the Council's LIR.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
3.10	The Minerals and Waste Local Plan: Strategic Sites and Policies (adopted January 2014) applicable policies: a) MSP6 Mineral Extraction outside Allocated Sites b) MSP11 Minerals Resource Assessment c) MSP12 Surface Development within a Mineral Safeguarding Area d) MWSP1 Presumption in Favour of Sustainable Development e) MWSP3 The Determination of planning applications	The Applicant has not considered Policies MSP6, MWSP1 and WESP3 within their **Policy Compliance Document [as updated alongside this submission]** on the basis that they are of limited relevance to the determination of the application for the scheme. Specifically, that it will not result in mineral extraction, and the policy context for MWSP1 and WESP3 is in relation to sustainable mineral development and the determination of planning applications for mineral and waste development which are not particularly relevant to the type of development proposed. In the Applicant's view, the relevant Mineral and Waste Plan policies are those relating to the sterilisation of minerals which have been addressed in the **PCD [as updated alongside this submission]** and in Appendix B of the **Planning Statement [APP-31]** which expressly deals with mineral safeguarding matters
3.11	The Council considers that the DCO application is in broad compliance with the policies set out in pgs. 3.8, 3.9 and 3.10 above subject to mitigation and the issues identified in the detail of this LIR being addressed.	This comment is welcomed by the Applicant.
3.12	Neighbourhood Development Plans: for reference, Staploe Parish has been progressing its Neighbourhood Development Plan. This has now reached its referendum stage (date to be confirmed).	The Applicant will consider the relevant policies of the Staploe Parish NDP once it has passed its Referendum. Until then it is considered to carry limited weight in decision making and does not formally form part of the Local Development Plan.
3.13	Other material considerations include: a) Renewable Energy Resources Topic Paper (2017) b) Sustainable Development and Environmental Efficiency Strategy (2017) c) Sustainable Development and Environmental Efficiency Strategy Action Plan 2022-2023(2017) d) Rights of Way Improvement Plan 2018-2023 (2018) e) Climate Emergency Statement (March 2019) f) Infrastructure Delivery Plan 2040 (2022) (Ref. Chp. 5.5 Renewable Energy) g) Trees and Development SPD (2024)	The approach the Applicant has followed in the production of the **Policy Compliance Document (PCD) [as updated alongside this submission]** is that advocated in the Planning Inspectorate's Pre-Application Prospectus 2024, which states that the PCD should include evidence of how the policy requirements established within any relevant National Policy Statement(s) (and / or emerging drafts) and other important national and local policy documents are satisfied by the application. In this regard the Applicant has focussed on addressing the policies of the relevant NPS's and the adopted Local Plans in the Host Authority Area.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	h) Parking Standards for Sustainable Communities: Design & Good Practice SPD (2014) i) Sustainable Drainage Systems SPD (2018) j) Planning Obligations SPD (2013) k) Technical Guidance: Waste Audits for New Developments (2021) l) Technical Guidance: Waste & Recycling in New Developments (2021)	The assessment has deliberately not taken into consideration supplementary planning guidance or techncial notes within the PCD such as those listed in paragraph 3.13 of the Councils LIR. The reason for this is that they are designed to emphasise and add to the main planning policy and guidance within the development plans which have been addressed in detail. These documents have all be referenced where necessary to inform a particular topic-based assessment or appraisal. It should be noted that the approach the Applicant has taken in this regard is wholly consistent with other Solar DCO applications.
3.14	With reference to this DCO Application, specific attention is drawn to Local Plan Fig 13 (pg. 100) which sets out the Council's broad locations with potential for large-scaled solar energy development.	As set out within the **PCD [as updated alongside this submission]** the Site is located within and without the broad locations for solar development in Bedford Borough, as identified on Local Plan Figure 13.
3.15	For clarity, the draft Local Plan 2040 and supporting evidence has been withdrawn and consequently carries no weight in decision making	Noted.
3.16	The Council considers that the Proposed Development broadly addresses the requirements of Local Plan Policies 56 and 57 in respect of the broad locations suitable for renewable energy development within Bedford borough (Ref. Figure 13), the general impacts of such development, and the additional impacts that specifically arise from solar energy schemes.	This comment is both welcomed and agreed by the Applicant
3.18	Aspect 1 Proposed Development description for planning consent: in reading through all material submitted to date, the aspect as to the exact nature of the Application and consent sought, including Provisions requested, requires clarification; namely:	See response to paras 3.19 – 3.23 of BBC's LIR below.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
3.19	In the Applicant's EIA Scoping Report (October 2023/ V.01) (para1.1.2) they state 'Capacity: the precise generating capacity and storage capacity will be subject to detailed design'. This flexibility would accord with PINs Advice Note 9 and is therefore in principle acceptable to the Council [EN-3 stresses the need to ensure that the significant effects of a Proposed Development have been properly assessed - Applicants need to ensure that the criteria in para1.4 of Advice Note 9 are achieved - this seems to have been acknowledged by the Applicant in para3.2.5 and para3.2.6 of the Scoping Report] (Ref. Applicant's EIA Scoping Report). The Council notes that at the early stages of such an Application the principle of flexibility (i.e. the 'Rochdale Envelope') is acceptable but that as the Scheme is developed resolution on such matters should be attained by the Applicant which is then reflected in the Environmental Statement's assessment.	The Applicant notes that BBC's comment is in relation to the approach taken by the Applicant at the EIA Scoping stage, which set the expectation that the Applicant provides greater detail and clarity on the Scheme and the basis of assessment as part of the Environmental Statement. In response, the Applicant has provided a description of the Scheme in **ES Vol 1 Chapter 2 The Scheme [APP-038]** along with the design parameters which are secured by the **Design Parameters and Principles Statement [REP1-030]** and the basis on which the design parameters have been assessed to establish a 'worst-case' (e.g. Table 2-1 **[APP-038]**). The principle of applying for a DCO based on design parameters and an associated **Works Plan [APP-009]** to ensure flexibility for post-consent detailed design is well-established and supported by the Planning Inspectorate's *Advice Note 9: Rochdale Envelope*.
3.20	In the Applicant's EIA Scoping Report para1.6.6 they continue 'A DCO, if granted, has the effect of providing consent for development, in addition to a range of other consents and authorisations, where specified, as well as removing the need for some consents (such as planning permission). Section 115 of the Planning Act 2008 also states that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right, but is associated with the NSIP applied for. This may be development that supports the construction, operation or decommissioning of the NSIP; which helps to address the impacts of the NSIP; or is of a type normally brought forward with the NSIP'. This suggests that the Applicant could secure DCO consent that confers planning permission(s) for 'associated development' that currently has not yet been fully resolved and/or assessed by the Applicant nor discussed and resolved with the Host Authorities – this raises significant concern (Ref. Applicant's EIA Scoping Report).	The Applicant notes that BBC's comment is in relation to the approach taken by the Applicant at the EIA Scoping stage raised concerns that *the 'associated development'* being applied for was at the time unclear. The Applicant has subsequently refined and set out the detail of what is being applied for, with the '*authorised development'* defined in Schedule 1 of the **draft DCO [REP1-005]**. The 'authorised development' has been separated into various different work numbers to enable the draft DCO to refer to specific elements of the authorised development by citing the relevant work number. A summary of the individual work number can be found at paragraph 4 of the Explanatory Memorandum [AS-010]. The scope of "further associated development" is expressly constrained. The **Explanatory Memorandum [REP1-007]** explains (at paragraph 5.1.4, and again at paragraph 10.1.4) that Schedule 1 of the **draft DCO [REP1-005]** includes a list of further associated development that may be undertaken, but

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		only insofar as it does not give rise to any materially new or materially different environmental effects from those assessed in the ES. The **draft DCO [REP1-005]** includes safeguards that prevent the 'scope creep' suggested by BBC's comment. For example, Article 7 (limits of deviation) only allows works to be carried out outside the limits of deviation where it is demonstrated to the Secretary of State's satisfaction, and following consultation with the local planning authority(s), that the deviation would not give rise to materially new or materially different environmental effects compared to those in the ES. The "limits of deviation" are defined as the limits for the scheduled works shown for each numbered work on the Works Plan. The Approach taken by the Applicant to defining the scope of the development is well precedented in other made DCOs.
3.21	In the Planning Inspector's Scoping Opinion (dated 8 December 2023) ID2.1.3 it is noted that 'The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES' (Ref. Planning Inspector's Scoping Opinion ID2.1.3). It is considered by the Council that various elements set-out above remain either unresolved or have yet to be tabled for discussion to attain in-principle agreement.	The Applicant notes that BBC's comment is in relation to the approach taken by the Applicant at the EIA Scoping stage where they requested a clear basis of assessment for the various components of the Scheme. The Applicant considers that this has been provided through **ES Vol 1 Chapter 2 The Scheme [APP-038]**, which sets out the Rochdale Envelope approach and the design parameters used to assess a reasonable worst case, supported by figures and indicative drawings in ES Volume 3 as listed at paragraph 2.1.6. Paragraphs 2.4.9 to 2.4.10 of **ES Vol 1 Chapter 2 The Scheme [APP-038]** explain that the submitted figures illustrate a reasonable worst-case layout by maximising the development footprint based on the parameters assessed, and that the technical chapters address how design variations within those parameters could alter the magnitude of effects. The key characteristics of the Scheme are described by Work Package within the **draft DCO [REP1-005]**, with assessed parameters for design, size, capacity, technology and location set out clearly in the tables through **ES Vol 1 Chapter 2 The Scheme [APP-038]**.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		Design parameters are secured through the **Design Parameters and Principles Statement [REP1-030]**, which explains that the ES has assessed reasonable maximum parameters and worst-case scenarios.
3.22	Aspect 1.1 Development: to address the aspect of 'Scheme description for planning consent' the Council has reviewed inter alia [APP-001], [APP-002], [APP-016], [APP-017], [APP-031] and [APP-037] to attain clarity as to the full scope of works being applied for; namely: a) [APP-017] 'Principal Development': 'The development to which the Application relates and which requires a DCO as described in Part 1 of Schedule 1 to the draft Order'. It is noted that the draft DCO Schedule 1 sets out 'Authorised Development' but does not separate between 'Principal Development' and Associated Development'. b) [APP-017] 'Associated Development': 'Defined under Section 115(2)(a) of the 2008 Act as development which is associated with the development for which development consent is required and that has a direct relationship with it. Associated Development should either support the construction or operation of the Principal Development or help address its impacts. It should not be an aim in itself but should be subordinate to the Principal Development'. The Council seeks clarity as to the works been applied for under each of these terms.	The 'Principal Development' is the nationally significant infrastructure project which requires development consent, namely the generating station with a gross electrical output capacity of over 50MW. This is described in Schedule 1, paragraph 3 of the **draft DCO [REP1-005]** as Work No. 1 (a ground mounted solar photovoltaic generating station comprising solar PV modules and mounting structures, inverters, transformers, switchgears and electrical and communication cables). Schedule 1, paragraph 3 of the **draft DCO [REP1-005]** then expressly identifies the 'associated development' authorised by the Order as including the remaining Work Nos. (and sub-works) which support the construction, operation and decommissioning of the generating station and/or address its impacts, including the battery energy storage system (Work No. 2), the on-site substation (Work No. 3), the grid connection to Eaton Socon (Work No. 4) and works at the Eaton Socon Substation (Work No. 5), together with internal cabling and ancillary infrastructure (Work No. 6), the operations and maintenance area (Work No. 6A), drainage lagoon (Work No. 6B), temporary construction and decommissioning compounds (Work No. 7), green infrastructure (Work No. 8), access works (Work No. 9 and Work No. 9A) and the agrisolar research area (Work No. 10). In addition, Schedule 1 includes a list of 'further associated development' which may only be undertaken within the Order limits insofar as it does not give rise to any materially new or materially different environmental effects to those assessed in the ES.
3.23	[APP-037] Environmental Statement (ES) Vol.1 Chp.1 para 1.2 the Applicant defines the Scheme to 'comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west	The Applicant notes BBC's concern that the brief description of the Scheme in **ES Vol 1 Chapter 1 Introduction [APP-037]** does not, of itself, identify individual components as 'principal' or 'associated' development. Chapter 1 is a high-level introduction which introduces the Scheme and directs the reader to

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation… generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS*'. Further, the Applicant state: a) para1.2.4 'a more detailed description of the 'Scheme' is set out in [APP-038] ES Vol.2 Chp.2'; and, b) para1.3.3 'The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling [cable corridor], and the grid connection to the Eaton Socon Substation'. The Council's reading of [APP-037] does not clarify which components of the Scheme are 'Principal Development', which are 'Associated Development', and how the Order Limits and Work Packages relate to the former two terms. It is suggested that such clarification is critical to any drafting of the [APP-016] DCO Agreement. (*[APP-031] Planning Statement: a) para1.2.2: the Applicant acknowledges that the precise generating capacity and storage capacity will be subject to detailed design but goes on to confirm that they have a grid connection agreement with National Grid for a 400 MW export and 100 MW import. It is therefore assumed that the figures stated is the maximum for purposes of the Environmental Statement and DCO Application. b) p4.5.2: the Applicant references Advice Note 9 in that it provides guidance regarding the degree of flexibility that may be considered appropriate within a DCO Application under The Planning Act 2008. The Applicant acknowledges that the Advice Note notes that there may be aspects of the Scheme that are not yet fixed prior to the DCO being granted, and therefore, it may be necessary for the EIA to assess likely worst-case variations to ensure that all reasonably	**ES Vol 1 Chapter 2 The Scheme [APP-038]** for the detailed description and the basis of assessment. The Applicant has responded above (BBC LIT paragraph 3.22) to clarify the meaning of Principal Development or Associated Development. In relation to capacity, **ES Vol 1 Chapter 1 [APP-037]** confirms that the 400MW export and 100MW storage reflect the Applicant's grid connection agreement, with final capacities to be confirmed through detailed design within the assessed parameters.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	foreseeable likely environmental effects of the Scheme are assessed. In-principle, the Council accepts this approach, subject to matters raised against this aspect). c)	
3.24	It is the position of the Council that the aspect of the description of Scheme, as raised by the Council in their Scoping response, their PEIR response, and their reference to the scheme as set-out/ defined by the Applicant in their Section 48 notification requires clarification. It is consequently suggested that the Applicant has not discharged their requirement of this issue in accordance with EIA Regulations (2017) Schedule 4(1)(b).	The Applicant has responded to BBC's queries in relation to the description of the Scheme in paragraphs 3.19 – 3.23 above, and trusts that this resolves BBC's outstanding concerns on what is being applied for through the DCO. In addition to the above matters, the Applicant considers that the Scheme description provided in **ES Vol 1 Chapter 2 The Scheme [APP-038]** provides a more than adequate description of the Scheme components in order to establish the likely significant environmental effects, and that consequently the requirement at Schedule 4(1)(b) of the Infrastructure Planning (EIA) Regulations 2017 is met.
3.25	Aspect 1.2 [APP-038] ES Vol.1 Chp2 Work Packages: while para 2.1.3 sets out a very similar description of the Scheme to that found in ES Chp1, namely, the: *'Scheme comprises a new ground-mounted solar photovoltaic energy generating station with a total capacity exceeding 50 megawatts (MW) and an associated on-site battery energy storage system (BESS) and 400 kV substation on land to the north-west of St Neots. The Scheme would allow for the generation and export of 400 MW of electricity to the National Grid from the solar photovoltaic energy generating station, and would be capable of exporting and importing up to 100 MW via the BESS',* the extent of the 'Work Packages' as set out in para 2.4.6 suggests a far greater level of construction activity and imposition/ effect on the recipient landscape context than the current planning description implies and consequently does not give a comprehensive understanding as to the full extent of ES assessment required and consent requested. By way of example, consent is sought for temporary compound, an operations and maintenance area, and an 'agrisolar' – these are not supported 'by figures, cross-sections, and	Paragraph 2.1.3 of **ES Vol 1 Chapter 2 The Scheme [APP-038]** provides a brief overview of the Scheme's principal elements and grid connection capacity. The same chapter then explains at paragraph 2.4.6 that the **draft DCO [REP1-005]** divides the Scheme into a series of 'Work Packages' (Work Nos.) which are referred to throughout the ES, and lists Work Nos. 1 to 10 (including Work No. 6A operations and maintenance area, Work No. 7 temporary construction and decommissioning compounds, and Work No. 10 agrisolar research area). The Applicant does not agree that these elements are unsupported by figures and drawings. Paragraph 2.1.6 of **ES Vol 1 Chapter 2 [APP-038]** identifies the supporting figures for Chapter 2, including the Illustrative Environmental Masterplan (**Figure 2-1 [APP-121]**), Indicative Engineering Drawings (**Figure 2-2 [APP-122]**) and the Indicative Construction Access and Compounds plans (**Figure 2-5 [APP-125]**). The ES provides component-specific indicative drawings and assessed parameters. For example:

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	drawings' to give an overall scale/ massing comprehension of what is proposed. In light of the powers sought by the Applicant, the Works Packages relating to scope and clarification of technical detail(s) requires discussion at Examination.	• the storage, operations and maintenance building is supported by an indicative drawing (**Figure 2-2u [APP-122]**) and assessed design parameters at paragraphs 2.4.138 to 2.4.139 **[APP-038]**; • temporary construction and decommissioning compounds are described at paragraphs 2.4.149 to 2.4.152 **[APP-038]**, with location assumptions tied to **Figure 2-5 [APP-125]**; • the agrisolar research area is described at paragraphs 2.4.169 to 2.4.172 **[APP-038]**, with the location shown on **Figure 2-1k [APP-121]**. Paragraph 2.4.9 **[APP-038]** confirms that the Illustrative Environmental Masterplan presents a reasonable worst-case layout which maximises the development footprint within the assessed parameters, and paragraph 2.4.10 explains that the technical chapters address how variations within those parameters could change the magnitude of effects.
3.26	Aspect 1.3 While 'Work Packages' are defined in [APP-038], they are referred to as 'Works Plan' in [APP-017] and 'Works' in [APP-016]: it is suggested that this needs consistence in defining the Scheme.	The Applicant notes the point regarding terminology. The 'Work Packages' or 'Works' are used interchangeably, with 'Works' being a simpler plural that relates more directly to 'Work' which is the legally operative term in the **draft DCO [REP1-005]**. The 'Works Plan' illustrates where each of the 'Works' can occur, providing the limits of deviation for the different Scheme components as secured by the **draft DCO [REP1-005]**.
3.27	Aspect 1.4 It is noted that the Applicant seeks powers with the 'Order limits'[App-009; Plans], 'means the limits shown on the land and crown land plans within which the authorised development may be carried out and land acquired or used' [Part 1, APP-016]. However, the Applicant also seeks powers adjacent to the Order limits *'in terms of the limits of the provision and how far "adjacent" extends from the Order limits within the meaning of Article 3(2), it is*	The power the Applicant seeks to obtain consent for in Article 20 of the **draft DCO [REP1-005]** follows the drafting in a model provision which derives from a specific power granted under both Section 53 of the Planning Act 2008 and Section 172 of the Housing and Planning Act 2016. Both these sections provide that entry to land for surveys can take place with the approval of the relevant Secretary of State.

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	noted that article 20 (authority to survey and investigate the land) grants the Applicant the power to enter not only onto land within the Order limits, but also onto other land "which may be affected by the authorised development". The extent of 'adjacent' land would therefore need to be judged on a case-by-case basis and in practice would be to the extent necessary for the construction and operation of the authorised development' [para 9.3.4, APP-017]. The Applicant suggests that 'the Order Limits along the Grid Connection have typically been set at 25m wide. The construction working width when laying the cable will typically be up to 12m wide which allows for the width of the trench, a temporary access track, and material stockpiling. There is therefore flexibility retained within the Order Limits to allow for the alignment of the cable to divert slightly should any unexpected constraints be found along the route' It is suggested that the term 'Adjacent Land' is defined with some indicative extent/width dimension within the [APP-016] DCO Agreement to confine powers requested.	These statutory powers allow project promoters to enter land to conduct necessary surveys and investigations without the landowner's consent. The statutory provisions from which they derive do not limit the geographical scope where such powers can apply to land and simply state that it is exercisable in respect of land which is "subject of the proposal or to *other land*" [emphasis added]. The provisions need to be interpreted in the context of the purpose for which they are provided, i.e. in respect of land that will either be acquired compulsorily or land that may be affected by the Scheme. There is, therefore, no need to define the term "adjacent land" in any way beyond the natural meaning and that for which the power exists and the Applicant maintains its position, set out in paragraph 9.3.4 of the **Explanatory Memorandum [REP1-007]** that this will need to be judged on a case-by-case basis. For this reason, the Applicant does not believe it is necessary to define the term "*adjacent land*".
3.28	Aspect 1.5 Definition of 'Temporary': as stated by the Applicant [APP-037] para1.2.3 *'Subject to the Scheme securing Development Consent in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40-years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning'.* In [APP-017] and in the [APP-016] Draft Development Consent Order it is noted that in Part 1 Interpretation the exact definition of the words 'temporary' and 'permanent' are not defined. This requires clarity in reading all submitted material in assessing which works are: a) a) Of a limited temporary - construction phase - duration (e.g. road access works [Part 2 Street Works, App-016]);	The Applicant does not consider that an exact definition of the terms "temporary" and "permanent" needs to be added the **draft DCO [REP1-005]**. Whilst the Applicant notes the Council's concerns in respect of ensuring that the duration or permanency of the different works forming the authorised development, the Applicant notes that this is secured in the DCO by way of requirement and also committed in the documents proposed to be certified with the draft DCO. The Applicant has set out the actions to be taken at the decommissioning phase at Section 2.7 of **ES Vol 1 Chapter 2 [APP-038]**.

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	b) Which commitments by the Applicant are temporary for the duration of the Scheme (e.g. creation and/or improvements to PRoWs; constructed culverts; etc.) after which they will be scrubbed-out/ revert to the landowner, some may be retained; and, c) Which works are permanent (e.g. landscape and habitat creation, Public Highway road works;) which will revert to the landowner and or local authority to maintain. Only on this basis can the harm, mitigation, and/or benefits be assessed accordingly (By example, if the proposed improvements to PRoW which facilitates 'access to the countryside' are temporary works for the duration of the Scheme, then they should be afforded minor weight in their benefit in assessing the Application). It is consequently suggested that this aspect requires discussion at Examination.	
	Aspect 1.1 to 1.5 Local Impact Report (LIR) - as identified and assessed: a) **Impact** plositive, neutral, or negative),during all phase of the development (construction, operation, replacement, decommissioning); and, at local to sub-regional scale: i. Potential long-term negative impact(s) unless resolved. ii. The Council do not believe that the DCO Agreement as currently drafted allows the Council sufficient clarity to consider the DCO Agreement, Schedules, and requirements and their impact on the local authority's area. iii. The Council do not believe that the DCO Agreement as currently drafted allows the Council to satisfy themselves that the construction, operation, replacement, and decommissioning of the Proposed Development is sufficiently controlled and mitigated or can be controlled by the Council within the current drafting.	The Applicant has addressed the substance of the Councils specific concerns in their responses to Paragraphs 3.19 – 3.28 above, all of which were included in their response to the Council's Relevant Representations (RRs). The Applicant hopes that the additional clarification provided will negate the need for the additional mitigation measures suggested by the Council in this regard. The Applicant notes the requirements for the drafting of the DCO, and submits that these are already provided for within the draft DCO **[REP1-005]** and associated Requirements. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s).

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	iv. The Council do not believe that the DCO Agreement as currently drafted allows the Council to be satisfied that their responsibilities for discharging the requirements, monitoring, and enforcing of such are clearly set out, nor how the Council is to resource and finance such responsibilities without setting a commitment by the Applicant as part of the DCO Agreement. b) As this is an in-principle Aspect, neither positive nor neutral impacts are identified. c) **Mitigation Measures** i. It is suggested that without the clarity as identified above, the full harm, mitigation measures proposed, planning weighting, DCO Agreement as contract, and possible enforcement actions cannot be concluded and/or enacted and consequently this Aspect needs resolution. ii. It is suggested that the lack of clarity of intent/ definition requires clarity and consistency of wording in the DCO Agreement and inter-related Management Plans. This is seen by the Council as central to the Examination, its determination, and concluding any DCO Agreement between Parties. d) **Contractual:** to be secured through the DCO Agreement and relevant Management Plan(s).	

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3.29	Matter 1 Local planning policy: [APP-032] Policy compliance document para7.1.1, Table 6, Section 6 - the Applicant makes the statement that the purpose of Policy 3S *'is not to necessarily to control the type of development proposed by the Scheme'* is not agreed. The Examination's attention is drawn to the wording of the policy that states 'all new development' and also criterion (viii) which is as much applicable to solar farms as to other forms of development. **Matter 1 (LIR):** - as identified and assessed: a) Impact (all Phases; local scale only): it is suggested that this is a technical planning matter – Policy 3S(viii) is applicable; neutral impact. b) This is a technical planning matter, neither positive nor negative impacts are identified. c) Mitigation measures: statement of fact that can be resolved/ agreed between Parties.	The Applicant notes this comment. However, the Applicant does acknowledge within the 'statement of compliance' with Policy 3S in the **Policy Compliance Document [as updated alongside this submission]** that development should safeguard the intrinsic character of the countryside, as per criterion (viii).
3.30	Matter 2 Operational (replacement) Phase: for completeness it is suggested that the Operational Phase should address the requirement for the replacement of infrastructure (e.g. solar panels and BESS batteries etc; and related haulage routes and vis-splays onto the Public Highway) during the lifetime of the proposed Scheme and that any 'severity'/ significant effect identified and then mitigated in the Construction Phase should then also be applicable to the Operational Phase. This should then be drawn through in to related address (Ref. PEIR Reports, 2024). It is suggested that this matter has not been fully addressed by the Applicant	The Applicant's ES assesses the impacts and effects from the operational phase of the Scheme. Table 2-35 of **ES Vol 1 Chapter 2 The Scheme [APP-038]** sets out assumptions on the operational lifespan for key components, including solar panels and battery storage units. Paragraph 2.6.6 notes that replacement would be periodic through the lifetime of the Scheme and would not involve the intensity of the initial construction phase, however paragraph 2.6.3 explains that, where significant replacement campaigns are required then there is the potential for more staff and specialist equipment to be required. Paragraph 2.4.8 of the **outline Operational Environmental Management Plan (oOEMP) [REP1-036]** confirms that routine inspections and assessments will be undertaken to determine the condition and performance of solar panels, associated equipment, and battery storage units, and that equipment reaching

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		the end of its functional lifespan or showing reduced performance will be scheduled for replacement. Paragraph 2.4.9 then explains that large scale replacement activities will not form part of routine operation and that potential impacts, including to highways, will be limited and can be controlled predominantly through the measures in the oOEMP. Paragraph 2.4.10 of the oOEMP **[REP1-036]** provides that, before any replacement activity involving more than 20% of the solar panels, a notification must be submitted to the relevant council for approval, setting out management measures that are consistent with the principles of the approved construction phase management plans, but proportionate to the scale of the proposed replacement activity.
3.31	Matter 3 Operational Phase (Landscape works): para2.4.149 *'An Outline Landscape and Ecological Management Plan (oLEMP) has been prepared which covers the Construction, Operational and Decommissioning Phases'*. In light of the potential for significant works that may be required circa every 20-years at the replacement of the solar arrays and BESS batteries (Ref. [APP-038] Table 2-35), it is suggested that when this occurs, the oLEMP is reviewed in terms of any harm occurring to the landscape/ habitat and that the Applicant is required to produce a mitigation and planting/ habitat strategy etc. to address such harm; i.e. the LEMP should remain 'live' for the duration of the Scheme (Ref. PEIR Report, 2024) (Ref. Planning Inspector's Scoping Opinion ID2.1.9). As above, it is suggested that this matter has not been fully addressed by the Applicant	The **outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]** has been prepared to cover the construction, operational and decommissioning phases of the Scheme. It is a control document to be certified as part of the DCO and secured via Requirement 4. The final LEMP must be prepared in substantial accordance with the oLEMP prior to commencing development and approved by the relevant council. The Applicant notes that any replacement works during the operational phase would utilise access tracks implemented during the construction phase to reach either the solar array areas, or the BESS facility. As a result, there would be no impact to any planting, and no vegetation clearance would be expected. The **oLEMP [REP1-040]** already establishes a 'live' review and adaptive management framework for the operational phase. Paragraphs 8.1.2 to 8.1.5 provide that the final LEMP will be kept under review and revised as necessary, with the Landscape Manager able to propose changes including re-planting, and with formal reviews held annually during the first five operational years and then at a maximum of five-yearly intervals, supported by an Ecological Clerk of Works and a suitably qualified arboriculturist, with reporting to councils.

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		Finally, any significant periodic replacement activity is also controlled through the operational management framework. The **oOEMP [REP1-036]** requires that, if any replacement activity involves more than 20% of the solar panels, a notification must be submitted to the relevant council for approval, setting out management measures consistent with the principles of the approved construction plans but proportionate to the scale of activity.
	Matters 2 and 3 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): the lack by the Applicant of any separate ES assessment of the Operational - Replacement Phase could result in un-identified effect and harm, lack of mitigation measures, and lack of any address through Management Plans; potential negative impact unless resolved. b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** assessment to be prepared and incorporated into Environmental statement (ES) and associated supporting material. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and Phase-specific Management Plans similar to App-154 to 167]: in this way the impact(s) would be identified and addressed - resulting in potential neutral impact.	The Applicant is aware that BBC, together with the other Host Authorities and, indeed, other parties have raised concerns about the adequacy of the Applicant's assessment of operational phase impacts, with specific reference to any substantial periodic replacement works. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken and is in the process of preparing a standalone Technical Note to provide more clarity on these works, the potential environmental effects that could arise, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready for submission to the examination for Deadline 3 and hopes that the additional clarification provided within the Technical Note will address the concerns raised by the Council and other Host Authorities in this regard. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s). The extent of the impact of a significant replacement campaign can be better judged following the submission of the Applicant's Technical Note at Deadline 3.

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3.32	Matter 4 Manufacture, decommissioning and recycling: with respect to both the operational (replacement and maintenance) phase and decommissioning phase regarding the recycling of materials / waste, the Applicant should have some acknowledgement / reference to the Waste Electrical and Electronic Equipment Regulations 2013….Whilst these matters are not strictly a planning matter (rather one of compliance with other legislation), a more detailed assessment of the operational and decommissioning phases regarding the recycling of materials / waste is required by the EIA Regulations in terms of an assessment of long-term, transboundary effect. In this regard, the Applicant is referred to Schedule 4(5) of the EIA Regulations (Ref. PEIR Reports, 2024). The Council expresses a significant concern that currently the majority of disused solar panels, BESS batteries, etc. are exported to 'land fill farms' outside the UK with no oversight or responsibilities attached to the Applicant. In terms of circular sustainability, this approach is not acceptable and needs a firm commitment by the Applicant of address. **Matter 4 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): negative impact unless addressed. b) **Mitigation measures:** a more comprehensive address is required, or legal commitments given by the Applicant, as to the address of waste generated both at the Replacement Phase and Decommissioning Phase with reference to the WEEE Regulations. c) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and Phase-specific Management Plans [similar to App-164]: in this way the impact(s) would be addressed – otherwise there is potential to remain a long-term negative impact. d) The Council note the Examining Authorities statement in the Rule 6 Letter annex F(9) - Ethical procurement – and suggests as worded this does not apply to possible waste export.	Paragraph 3.1.8 of the **outline Waste Management Plan (oWMP) [APP-164]** explains that the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 require separate collection of WEEE (including solar PV panels and associated apparatus) and transfer to authorised treatment facilities for recycling or recovery. It also describes the producer take-back obligations intended to ensure proper treatment and recycling where possible. Paragraphs 6.2.8 to 6.2.11, and paragraph 6.3.7 of the **oWMP [APP-164]** confirm that electrical equipment arising during operation and decommissioning will be managed in accordance with the WEEE Regulations 2013 and diverted to authorised WEEE collection and recycling routes and sets out the approach to specialist recycling and manufacturer take-back for solar panels and battery storage units. In EIA terms, **ES Volume 1 Chapter 16 Other Environmental Topics [APP-052]** identifies waste streams arising from operation and provides estimated arisings and anticipated 'fate' by reference to the waste hierarchy and implementation of the **oWMP [APP-164]**. Paragraph 16.3.41 **[APP-052]** recognises that specialist capacity for PV panel and battery waste is developing, and notes that the recycling industry is expected to respond over time. This was in also the position of the Secretary of State in determining the East Yorkshire Solar Farm DCO (ExA report ref 3.13.50 and 3.13.51), confirming that although the capacity of facilities to handle decommissioned solar PV panels are still developing, the recycling industry is likely to respond to demand over time. In relation to oversight, the controls in the oWMP **[APP-164]** require that waste is removed by registered carriers to appropriately licensed facilities, with Waste Transfer Notes or Consignment Notes recording the destination facility and permit details. The oWMP further requires a waste register recording waste movements, destinations and whether waste is recycled, recovered or landfilled. These requirements provide an audit trail for waste destinations and treatment routes throughout the Schemes operation and decommissioning.

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		The Applicant notes the requirements for the drafting of the DCO and these are accommodated within the draft DCO **[REP1-005]** and associated requirements. The Applicant further notes that the WMP is secured under Requirement 6 of the **draft DCO [REP1-005]**, which provides that no phase of the authorised development may commence until a waste management plan for that phase has been submitted to and approved by the relevant planning authority, which must be in substantial accordance with the oWMP to the extent that it is applicable. Based upon the clarification provided above, the Applicant does not consider there would be a negative impact in this regard.
4.1	**ALTERNATIVES AND DESIGN EVOLUTION** The Council notes that they do not have the necessary professional and/or technical discipline specifically relating to solar farms and BESS development infrastructure to respond on this aspect. On this basis, the Council will not be looking at submitting Relevant Representations to the Examination on this aspect.	The Applicant notes this comment.
4.2	With regards to site selection, it is noted that the Applicant has worked closely with the Council's Archaeology Officer in identifying and preparing a mitigation strategy for the found Scheduled Monument, including the Applicant removing the solar arrays identified for this area. It is suggested that this has been a positive outcome regarding the design evolution of the Scheme.	The Applicant notes this comment.
4.3	Matter 5 Pollution and risk: [APP-034] Design Approach Document para 4.3.27 to 4.3.32 - there is no detailed discussion regarding the design approach to the prevention and mitigation of lithium-ion battery fires through robust engineering, including Battery Management Systems (BMS) for monitoring, thermal management, adequate ventilation, fire suppression (like water mist), fire-resistant	Paragraphs 4.3.27 to 4.3.32 of the **Design Approach Document [APP-034]** explain that, at the outset of the design process, an AC-coupled (centralised) BESS solution was selected so that the BESS can be focused in a single compound and specific control measures can be put in place to manage the facility in the event of an incident such as a fire, rather than distributing equipment across the Site.

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	materials, spatial separation, and early detection systems (smoke / CO detectors) to manage risks like thermal runaway, while complying with strict health / safety regulations (e.g., NFPA 855, UL 9540) and ensuring clear access for emergency responders. Further, there is no discussion regarding decommissioning management options of waste materials generated by the Scheme which may have informed the Scheme's approach. Such a review/ assessment should then inform inter alia the Environmental Statement, the [APP-162] outline Battery Safety Management Plan, and any specific protocols and safety measures for the management and operation of the BESS facility informing the DCO's Schedule of Requirements. It is suggested that this requires some response from the Applicant.	The detailed design of the BESS will be undertaken post-consent in accordance with the **Design Parameters and Principles Statement [REP1-030]** and the **outline Battery Safety Management Plan (oBSMP) [APP-162]**. The **oBSMP [APP-162]** commits to procurement and design in accordance with recognised standards including NFPA 855 and UL 9540/UL 9540A, including large scale fire testing and consequence modelling to establish minimum separation distances and demonstrate loss will be safely limited to one enclosure. It specifies that battery module safety features will include (as applicable) liquid cooling and active thermal management, venting and gas channels, and thermal or multi-sensor monitoring devices (paragraph 2.2.11, **[APP-162]**), with battery cells/modules certified and tested to relevant UL standards (paragraphs 2.2.12 to 2.2.13, **[APP-162]**) . For monitoring and control, the oBSMP identifies the minimum safety functions expected from the Battery Management System (BMS), including high cell temperature and thermal runaway trips (paragraph 3.2.3, **[APP-162]**) and confirms that BMS controls will incorporate NFPA 855 monitoring features (paragraph 3.2.4, **[APP-162]**). In relation to firefighting measures and responder access, paragraph 4.1.5 of the **oBSMP [APP-162]** sets out the approach to suppression and ventilation arrangements, including that any water-based suppression or thermal runaway propagation prevention systems must be capable of operating effectively in conjunction with gas exhaust/ventilation systems to minimise deflagration risk. The oBSMP also secures clear emergency access design, including a 6m access-route width around the BESS area and two separate fire service access points so that responders do not have to drive through a smoke or gas plume (paragraphs 4.2.3 to 4.2.4, **[APP-162]**), with the final emergency plan to be developed in consultation with Cambridgeshire Fire and Rescue Service (CFRS) (paragraph 4.4.1, **[APP-162]**).

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		The Applicant issued a signed statement of common ground **[PDA-019]** with the CFRS at Deadline 1. This confirms agreement on the details set out within the oBSMP **[APP-162].** On decommissioning and waste, the approach is addressed through the oWMP **[APP-164]** and the **outline Decommissioning Environmental Management Plan (oDEMP) [REP1-038]**. The oDEMP confirms (Table 5.12, **[REP1-038]**) that end-of-life waste from solar panels and BESS will be managed through refurbishment, repurposing or recycling where feasible, with periodic review of emerging recycling technologies. The oBSMP (paragraph 4.4.3, **[APP-162]**) also anticipates post-incident recovery planning including removal and disposal of damaged equipment and confirms safe decommissioning of the BESS will be addressed in the final DEMP (paragraph 5.1.11, **[APP-162]**).
	Matter 5 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): negative impact b) Neither positive nor neutral impacts are identified. c) **Mitigation Measures**: i. A more comprehensive address is required, with legally enforceable commitments given by the Applicant, to address the risk of potentially generated pollution (air, groundwater, and water), and in the worst-case scenario, what mitigation measures and commitments are in place should contaminated water flow into the surrounding water courses. This should include financial compensation measures to host and statutory authorities. ii. The Applicant should evidence that the Battery Safety Management Plan [APP-162] is acceptable to the statutory authority (Environment Agency) and both CCC and Bedford Fire and Rescue Services. iii. The Applicant should ensure (by way of funding) that the Fire and Rescue Services have the required training and necessary equipment to deal with such development-specific	In the context of the mitigation measures sought by the Council, much has been clarified by the Applicant in their response to the Council's RRs above. However, it is also now relevant to note that the Applicant has subsequently agreed a **Statement of Common Ground with the CFRS [PDA-019**] on the scope and content of the oBSMP **[APP-162],** confirming their acceptance of the measures contained therein. A similar agreement is being sought with the Environment Agency which will include agreement on many of the Council's concerns regarding mitigation of pollution from a failure event at the BESS. As noted above the Applicant has common ground with the CFRS over the scope and content of the oBSMP. There has been no suggestion within those discussion that it would be necessary for the Applicant to fund further training or additional equipment in this regard, nor is it the Applicants position that such funding should be necessary. There are a number of these facilities within Cambridgeshire and Bedford Borough and any additional training or equipment should already be in place.

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	fires/ safety risk. In discussion with the Applicant, these discussions have been initiated for the Applicant to conclude. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and Battery Safety Management Plans [App-162]: in this way the impact(s) would be addressed – potential neutral impact.	The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that its implementation will mitigate any impacts.
5.1	**ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY** [APP-039] The Council notes that they do not have the necessary professional and/or technical discipline specifically relating to solar farms and BESS development infrastructure and related methodology to respond on this aspect. On this basis, the Council will not be looking at submitting Relevant Representations on the EIA Methodology aspect to the Examination.	The Applicant notes this comment.
5.2	It is noted that the Council, with the other Host Authorities, has appointed an external Consultant to review specific EIA aspects, which are set out below.	The use of an external consultancy was discussed and agreed with the Host Authorities prior to submission of the DCO application. The Applicant is aware that an external consultant (AECOM) has provided responses on the Host Authorities behalf.

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6.1	Matter 6 Site boundary: It is noted that the Scheme's Red Line boundary is INCLUSIVE of several Public Highways (roads). The Council questions whether this is the correct approach as the single Red Line boundary does not reflect the complexity of more detailed individual Site's 1 to 14's boundary screening conditions that will need to be addressed to mitigate harm (Ref. Scoping Report, 2023). The crossing of the Public Highway remains evident in the DCO Application regarding Sites 3, 5, 6, 9 and 10. The Council notes that the Applicant has proposed hedgerow, woodland belt, and grassland planting adjacent to all Public Highways which would address the concern raised. However, the Council would still like a stated commitment to minimum width of screen planting proposed to all Scheme/ Site boundaries ([APP-121] is not of a scale that this can be read). This would aid future site-based approval and enforcement if required. This would then accord with the Applicant's stated Scheme buffer and utility easements widths, as set out in [REP1-040] para3.4.1. **Matter 6 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale):negative impact: b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** a more comprehensive address is required to ensure that all individual Site parcel boundaries that abut the Public Highways (inclusive of PRoW) are adequately mitigated in terms of potential LVIA harm, that suitable screening and habitat widths are sated and secured, and potential mitigation measures to all boundaries are identified across various Management Plans. d) **Contractual:** to be secured through the relevant Management Plans: in this way the impact(s) would be addressed and mitigated – potential positive impact.	The Applicant notes that the landscape proposals from **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [APP-121]** are secured by the Illustrative Landscape Proposals at Appendix A of the **oLEMP [REP1-040]**. The oLEMP is a control document that will be certified as part of the Development Consent Order (DCO). 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 councils prior to commencement of construction provides that no phase of the authorised development can commence until a LEMP for that phase, which is in substantial accordance with the outline LEMP, which forms part of the Application documents, has been submitted to and approved by the local planning authority. The final LEMP to be approved by the local planning authority will accordingly implement the landscape proposals, which must therefore be in substantial accordance with the Illustrative Landscape Proposals at Appendix A of the **oLEMP [APP-159**]. The Applicant considers this approach gives the councils sufficient oversight and 'sign-off' to the landscape proposals prior to construction. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and through there implementation there should be a positive impact.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
6.2	Landscape and Visual - Zone of Theoretical Visibility: 'The ZTV is based on the 'Indicative Solar and Associated Infrastructure' zoning shown on the Applicant's Figures 3-2a to 3-2c. The initial ZTV has been modelled based on a height of 3m to reflect the maximum height above ground of the solar arrays across the Site. The Council notes that as part of this Application, the Applicant has stated associated buildings and infrastructure heights as follows - storage buildings at 4.5m (para3.3.23), switchgear 8m (para3.3.16), and transformers 12m; also ref. Fig. 7-5 & 7-6. These associated buildings and infrastructure heights need to be assessed in the LVIA (Ref. Scoping Reports, 2023). In [APP-038] Tables 2.1 to 2.33 the Applicant confirms the following maximum heights: solar PV module 3m; auxiliary transformer 3m; palisade and substation fencing 3m; centralized inverters, solar and battery transformers 3.15m; Control building 4m; CCTV 4m; BESS 4.4m; water storage tanks 4.5m; substation control and maintenance building 6m; Agrisolar PV panels 6.6m; and, electrical equipment 13.6m. In [APP-070] para2.2.2(2)(3) the Applicant confirms that the ZTV has addressed the height of the highest structures proposed. This resolves this Scoping matter.	The Applicant notes this comment and welcomes agreement from the Council that the matter is resolved.
6.3	Viewpoints LVIA: the Council noted that *'rather it is the people that would be experiencing the view from it. Receptor groups within the study area that are likely to experience views of the Scheme include: …ii) Users of public rights of way, and other routes/ land with public access…':* It is unclear how the *'sequential visual effects'* (Applicant para7.6.3iv) along Public Right of Ways (Applicant Fig. 14-2) has been provisionally assessed in Fig. 7-7 Viewpoint Locations. The Council would, apart from what is already presented, require a more localised LVIA with regards to both PRoWs and heritage assets (Ref. Scoping Report, 2023). In [APP-129] Figure 5-4a the Applicant has set out the LVIA viewpoint locations which illustrates that views from PRoWs	The Applicant notes this comment and welcomes agreement from the Council that this matter is resolved.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	(Footpaths, Bridleways and Byways) have been undertaken/ addressed. This resolves this Scoping matter.	
6.4	Matter 7 Landscape establishment (Months 2 to 30): 'Establishment of soft landscaping in areas of habitat mitigation'. The Council are not supportive of this proposed extensive period to undertake soft landscape and habitat works (with reference to the Applicant's Illustrative Environmental Masterplan). The Council would seek a Condition that the soft landscaping works are implemented within the first year of construction, to then enable a two-year establishment and replacement review with potential remediation strategy, prior to construction moving off site. Further, strong penalties should be put in place in any consent given, should the Applicant not instate the soft landscape and habitat works as then consented (Ref. PEIR Reports, 2024). In [REP1-040] Outline LEMP Chp 6.4 'Establishment Period (years 1 to 5)' the Applicant states that *'existing trees and woodlands would be surveyed in operational year 1', 'existing hedgerows will be brought into a rotational cutting'* (no year stated), and Chp 6.5 that native species woodland, woodland belt planting, individual tree planting, and grassland would occur within the 'establishment period (years 1 to 5)'. In [APP-038] this is broadly defined as Work Package 8; in para 2.5.4(v)(m) (Construction Programme) it is stated that the establishment of soft landscape works in areas of habitat would occur in months 2 to 30. There are various concerns arising; namely: a) The terms 'establishment period' and 'operational year' are currently not defined (say in [APP-016] DCO) and require clarity. b) The Council would like to see these start points defined in relation to [APP-017] Interpretation – "commence" means to carry out any material operation (as defined in section 155 of the 2008 Act) forming part of the authorised development	The Applicant recognises and supports the Council's objective of securing early delivery of landscape mitigation and confirms that planting will be undertaken as early as practicable within each phase of construction. However, it is not feasible to implement all soft landscaping and habitat works within the first year of a 30-month construction programme. The Scheme will be delivered across multiple sites (A–D and cable corridors) and construction will progress in phases. Planting must logically follow construction within each parcel to avoid damage to new plants and to coordinate with soil handling, drainage and access works. **ES Vol 1 Chapter 5: Landscape and Visual (LVIA) [APP-041]** assumes mitigation planting will be implemented during construction and in place by the opening year (Year 0), with effectiveness increasing through establishment to Year 10. There is therefore no deferral of mitigation to operation. The quantum of planting is substantial (c.19ha woodland, 17.4km hedgerow and 375 trees). Hedgerow planting alone, typically at c.5 plants per linear metre in double rows, equates to approximately 87,000 individual plants. Woodland planting would add tens of thousands more transplants, meaning the Scheme involves well in excess of 100,000 individual plants overall. Planting is undertaken within the dormant season (November–February). Given the scale of planting, phased construction sequencing, ground conditions and supply chain constraints (including the need for advance contract growing), delivery within a single planting season is not realistic and would materially increase establishment risk. Implementation across at least two planting seasons within the 30-month programme represents a proportionate and robust approach. The **oLEMP [REP1-040]** is secured by Requirement and a final LEMP must be approved prior to commencement. The final LEMP will provide for a five-year establishment period, monitoring and replacement planting.

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	other than the site preparation works (except where stated to the contrary), and "commencement", "commenced" and "commencing" are to be construed accordingly'. c) The Council would like to see the implementation of landscape and habitat works phased at the start of construction works within each Site, and defined accordingly, rather than an open statement of months 2 to 30. This is to ensure that mitigation landscape screening is undertaken as soon as practically possible, and allows for the establishment period to be initiated at the very onset of construction works.	To provide clarity, the Applicant confirms that the five-year establishment period will commence from the date of planting within each relevant phase, rather than being tied solely to the operational year. Landscaping will be implemented as early as practicable within each construction phase and completed prior to operation, with establishment and remedial measures secured through the approved LEMP. In respect of the issues raised in relation to the **draft DCO [REP1-005]**, the Applicant's position is as follows: • There is no need to define the terms "establishment period" and/or "operational year" within the draft DCO as the extent of these periods is set out in the **oLEMP [REP1-040]**, which is secured by Requirement 4 of the draft DCO. • Operational year refers to each and every year the Scheme is in operation. Including these definitions within the draft DCO would be redundant and will not reinforce in any way the Applicant's commitment to obtain approval of the final LEMP for each phase of the authorised development and from implementing the LEMP as approved and maintained throughout the operation of the Scheme. It is, therefore, the Applicant's position that including the definitions suggested by the Council are not necessary on the basis that they would not provide additional clarification to the commitment to obtain approval on the LEMP for each phase or to implement and maintain the works set out in the LEMP as approved. With respect to the definition of "commence", the Applicant confirms that this definition has already been adopted.
6.5	Matter 8 Vegetation clearance: for completeness it is assumed that woodlands, trees, and/or hedgerows that are cleared will be replaced on a like-for-like basis and addressed within the Construction	The Applicant confirms that vegetation clearance will be minimised and limited to that necessary to facilitate construction activities, including temporary or permanent access between fields where this cannot reasonably be avoided. The

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	Environmental Management Plan (CEMP). Vegetation to be removed to facilitate access and/or visibility splays will be replaced on a similar basis to mitigate the long-term fragmentation of the countryside hedgerows currently framing fields and the public highway (Ref. PEIR Report, 2024). With regards to the DCO Application, the Council requires a commitment from the Applicant that any hedgerow, trees and habitat planting that may require removal during any replacement works is reinstated with immediate effect (within the next available planting season) after the replacement works are undertaken and that an '*establishment period'* of five-years is then enacted from that date.	Scheme delivers a substantial net increase in planting overall (including approximately 17.4 km of native species hedgerow), such that any localised losses required to enable construction would not result in long-term fragmentation of the landscape. Where hedgerow or other planting is removed to facilitate construction, reinstatement will be secured through the approved landscape proposals and the **oLEMP [REP1-040]**, including monitoring and replacement provisions. For the operational phase, the Applicant notes that any replacement works would utilise the access tracks implemented during the construction phase to reach the solar array areas and/or the BESS facility. As a result, there would be no impact to any planting and no vegetation clearance would be expected. The **oLEMP [REP1-040]** provides an adaptive management framework during operation, including review and (where necessary) re-planting, with reporting arrangements to the local planning authorities.
	Matters 7 and 8 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): negative impact. b) Neither positive nor neutral impacts are identified c) **Mitigation measures:** a more comprehensive address as set out above is required within the inter alia Landscape Environmental Management Plan/ other to ensure landscape establishment, timely replacement in case of failure, and replacement of existing landscape. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and the relevant Management Plans [REP1-036/ 158/159]: in this way the impact(s) would be addressed – potential positive impact.	The Applicant has made their position on this matter clear in their response to paragraphs 6.4 and 6.5 of the Council's LIR above. This includes further clarification on the measures proposed. The Applicant agrees that these matters can be adequately agreed upon the discharge of DCO requirements and the finalisation of the relevant management plans and that the overall effect would be positive.
6.6	Matter 9 Employment: *'three Full-time-employment (FTE) roles working in land management including landscape maintenance and agriculture'*. The Council note their support to the Applicant's commitment to appointing this workforce to manage the landscape	The Applicant welcomes the Council's support for the commitment to operational land management roles. As set out at paragraph 4.1.6 of the **oLEMP [REP1-040]**, the Applicant currently intends that the three land management roles will be permanent positions directly employed by the Scheme (subject to review).

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	and habitat for the duration of the Scheme but would like to see these roles set out specifically as part of both the CEMP and the Landscape and Ecological Management Plan (Ref. PEIR Report, 2024). It is noted that in the [REP1-040] para4.1.2 the roles of a '*specialist landscape and ecological contract'*, Environmental Manager, Environmental Clerk of Works, and Ecological Clerk of Works are set out but it is unclear if these roles are FTE on-site roles. This requires clarification and to be set out in the [APP-016] DCO Agreement.	The Applicant currently intends roles to be permanent positions directly employed by the Scheme (subject to review), with the option for a multi-year maintenance contract. The roles referenced within the **oLEMP [REP1-040]**, such as for example the Landscape and Ecological Works Contractor, Environmental Manager, Environmental Clerk of Works and Ecological Clerk of Works, are functional roles required to implement and oversee environmental management and monitoring. Their input will be proportionate to the phase and scale of works, with certain roles being present as required during construction, and specialist contractor support and professional oversight continuing into operation as necessary to deliver the **oLEMP [REP1-040]** objectives.
	Matter 9 (LIR): - as identified and assessed: **a) Impact** all Phases; local to sub-regional scale): negative impact **b)** Neither positive nor neutral impacts are identified. c) **Mitigation measures:** clarification of intent, staffing, and related funding for the duration of the development. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and the relevant Management Plans: in this way the impact(s) would be addressed – potential positive impact.	As set out above there is a clear position on the roles referenced within the Applications submission documents. The Applicant is also agreed on how they would be secured and it is not considered relevant ort necessary for the Application to comment upon the funding of those roles. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s).
6.7	It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities, and as subsequently notified to the Applicant who confirmed agreement, to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters.	The Applicant notes this comment.
6.8	Matter 10 LVIA: Landscape and Landscape Visual Impact Assessment matters are considered within Chapter 5 of the Environmental Statement (ES) [APP-041] and supporting figures and appendices. The Scheme has the potential to transform the local landscape by altering the character and by virtue of the scale of the proposals; there will be significant residual landscape character and	The Applicant notes the Council's request for clarification regarding the treatment of operational replacement activities within the LVIA. The Applicant does not agree that operational replacement activities should be assumed to have the same landscape and visual effects as the construction phase of the Scheme. **ES Vol 1 Chapter 5 [APP-041]** operational assessment is

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	visual impacts that cannot be mitigated. Effects will primarily be derived from the introduction of construction (albeit temporary and reversible) and solar PV panels over a large area, rather than by modification of landform, field patterns or loss of characteristic elements such as hedgerows or woodland, which will be retained. The main landscape receptors are Bedford LCA 1B: Riseley Clay and Farmland and Huntingdonshire LCA: Southern Wolds. Significant effects are assessed in construction and operation Year 1 for LCA 1B: Riseley Clay and Farmland and for Huntingdonshire LCA: Southern Wolds in construction but not operation. No significant landscape effects are assessed for Year 10 or beyond.	based on the presence of the installed Scheme in situ, and the key drivers of landscape character and visual effects in operation derive from the introduction of the Scheme, rather than from short-duration maintenance activity. Where replacement activity is required, it would be periodic and not a routine operational occurrence. The oOEMP **[REP1-036]** confirms that impacts from replacement activities would be limited and would be controlled predominantly through the measures within the operational environmental management framework. In terms of control and enforceability, Requirement 9 of the **draft DCO [REP1-005]** already secures the preparation, approval and implementation of a final Operational Environmental Management Plan (OEMP) in substantial accordance with the **oOEMP [REP1-036]**. The oOEMP further provides that, prior to replacement activities involving replacement of more than 20% of the solar panels, a notification must be submitted to the relevant local planning authority for approval, setting out management measures consistent with the approved construction-phase management plan principles (CEMP, CTMP, PRoWMP and OEMP), but commensurate with the scale of the proposed activity. This mechanism provides a proportionate and enforceable means of managing any temporary effects which might arise during larger-scale replacement campaigns, without reopening the LVIA's significance conclusions for an operational 'with development' scenario. In addition, the **oOEMP [REP1-036]** confirms that vegetation and landscape management during operation is to be delivered in line with the **outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]**. As noted above, the approval and implementation of a detailed LEMP is secured by Requirement 4 of the **draft DCO [REP1-005]**, which provides that no phase of the authorised development can commence until a LEMP for that phase, which is in substantial accordance with the oLEMP, has been submitted to and approved by the local planning authority.

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		This provides the mechanism by which landscape mitigation and screening effectiveness is maintained through the operational lifetime of the Scheme, including during maintenance activity. The Explanatory Memorandum also confirms that site clearance controls are linked to the LEMP requirements, reinforcing the overall approach to protecting landscape features through the Requirements framework. Whilst these are the Applicants clear views on the matter, as stated in response to Matters 2 and 3 of BBC's LIR above, the Applicant is in the process of preparing a standalone Technical Note to provide more clarity on replacement works including the potential environmental effects that could arise, and the embedded mitigation measures that would apply. The Applicant expects to have this Technical Note ready for submission to the examination for Deadline 3.
6.9	For Bedford Borough Council LCA 1B: Riseley Clay and Farmland effects at Y10 are assessed as minor and non-significant. 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 Proposed Development 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 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.	The Applicant notes this comment. However, does not agree that the effect on Bedford Borough LCA 1B: Riseley Clay Farmland at Year 10 should be assessed as significant. As set out in ES Vol 2 Appendix 5-3 [**APP-069**], the Scheme would alter some of the key characteristics of this part of LCA 1B, including the change in land use from arable crop to solar panels, and this is reflected in the assessment of a Moderate to Major Adverse (Significant) effect at Year 0. However, the assessment also concludes that the Scheme would not fundamentally alter the nature of the LCA, which is a large-scale, gently undulating and open landscape that can accommodate a development of this scale and low-level height. The Scheme would not alter the underlying topography or the field pattern, key views to church spires would be retained, and there would be minimal loss of hedgerow and no loss of trees. At Year 10, mitigation planting would have established such that the Scheme would be better integrated into, and more effectively mitigated within, LCA 1B. Linear belts of planting on field boundaries would reduce visibility of the Scheme within the wider landscape and enhance an existing characteristic of the LCA by strengthening hedgerows and hedgerow trees in accordance with the landscape

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		strategy for this character area. For those reasons, the scale and magnitude of effect reduce at Year 10, resulting in a Moderate Adverse level of effect which is assessed as Not Significant. This conclusion is carried through into ES Chapter 5 **[APP-041]**, which confirms that no significant residual effects on landscape character remain at Year 10.
6.10	The Proposed Development has been identified in the LVIA as resulting in a significant change to a variety of visual receptors, with significant residual visual effects identified for residential locations at Year 1 (reducing to non-significant by Year 10) and from PRoW in the immediate vicinity of the solar panels and more distant open and elevated views from higher land (some remaining significant at Year 10). There will be sequential changes in views and adverse visual impacts for users of PROWs. This includes the different users of the network, such as equestrians and cyclists as well as walkers. No significant visual effects have been identified on residential receptors located directly within the villages located within the study area.	The Applicant acknowledges the LVIA findings and the fact that the Scheme would give rise to significant visual effects for a limited number of receptors, particularly users of Public Rights of Way within and near the Site. The assessment also identifies that effects would reduce over time as mitigation planting establishes, with the majority of residential effects becoming non-significant by Year 10. In spatial terms, significant effects are largely confined to receptors in the immediate vicinity of the Site and to certain elevated views. Relatively limited effects have been identified for the majority of receptors within the main settlements across the study area, reflecting the influence of intervening landform, vegetation and built form, as well as the embedded design of the Scheme, which incorporates appropriate stand-offs, buffers and the retention of existing landscape features in response to environmental constraints and consultation feedback (refer to Chapter 3 **[APP-039]**). With regard to Public Rights of Way, the Applicant recognises that users, including walkers, cyclists and equestrians, may experience changes in views where routes pass through or close to the Site. However, these effects are localised and would diminish over time as planting matures, in accordance with the embedded mitigation strategy. Overall, the LVIA demonstrates that while some localised significant effects would occur in the short term, these are relatively limited in extent and would reduce over time.

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6.11	Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the landscape 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 Applicant notes the comments regarding visual effects and methodology but does not agree that the assessment relies inappropriately on mitigation or that effects relating to changes in view composition have not been considered. The LVIA explicitly assesses the nature of visual change, including the degree of contrast, integration and alteration to the composition of views, in accordance with the methodology set out in Appendix 5-1 **[APP-069].** The LVIA does not apply a fixed or mechanistic threshold for significance, which is consistent with GLVIA3. However, as set out in the methodology, effects in the Moderate to Major range have typically been considered to represent the threshold of likely significant effects, with the final judgement informed by professional judgement, having regard to sensitivity and magnitude in each case.
6.12	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 Council considers that a more appropriate agriculturally based management regime of lower hedgerows (1.5m) should be implemented on a rotational basis post operation.	The Applicant notes the Council's suggestion regarding post-operational hedgerow management. The proposed landscape strategy seeks to balance the retention of local landscape character, including its open qualities, with the need to appropriately integrate the Scheme and reduce visual effects over time. The height and management of hedgerows during the operational phase will be secured and controlled through the **oLEMP [REP1-040],** which provides for ongoing management and maintenance. This allows for a proportionate and responsive approach to hedgerow management, having regard to both landscape character and visual amenity considerations. A fixed hedgerow height across the Site is not considered necessary or appropriate, as management requirements will vary depending on local context, including proximity to receptors and the role of planting in mitigating visual effects. In relation to the post-decommissioning phase, the land will be returned to landowners in accordance with the relevant commercial agreements. As set out in the **oLEMP [REP1-040],** planting established as part of the Scheme would be handed back as mature landscape features. It is anticipated that landowners would retain this planting once established. However, ongoing management,

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		including hedgerow height, would thereafter be at the discretion of the landowners. As such, it would not be appropriate or reasonable for the Applicant to prescribe a fixed long-term hedgerow management regime beyond the operational lifetime of the Scheme.
6.13	**Matter 10 (LIR):** - as identified and assessed: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR) **Impact 1: Construction Phase** a) **Positive:** no positive landscape or visual impacts arising from construction of the Proposed Development have been identified, reflecting that construction is largely disruptive in a rural context and may involve removal of landscape elements (hedgerows) and/or introduction of machinery/vehicles and activity in a concentration which is incongruous in a rural context and impacts landscape character and visual amenity. b) **Neutral:** no neutral landscape impacts arising from construction of the Proposed Development have been identified. Table 2.1 of ES Appendix 5-5: Effects on Visual Receptors provides the assessment of visual effects on residents assessed within the study area, with reference to relevant viewpoint assessments. In construction, there would be no change / a neutral effect on visual amenity for the views of residents at: R1 – Swineshead Village; R3 - Coldham Lodge Farm; R6 - Green End; and R37 - Field Farm. In construction, there would be no change in views of people using community facilities C1-C4 and C6-C8, with a minor change for users of C5 - Church of All Saints at Little Staughton. **c) Negative** i. In construction, moderate to major adverse (significant) effects on landscape character are identified for LCA 1B Riseley Clay Farmland and the Southern Wolds LCA.	The Applicant notes the Councils' assessment and considers that it broadly aligns with the findings of the LVIA, particularly in recognising the role of landscape mitigation in reducing effects over time and the distinction between construction, Year 0 and Year 10 effects. The Applicant notes in particular the Councils' recognition that *"the landscape proposals are tailored to the location and required functions of each part of the Proposed Development*", which reflects the iterative design process underpinning the LVIA and the embedded mitigation strategy. In relation to hedgerow management, the Applicant notes the Councils' comments regarding post-decommissioning heights. The proposed management of hedgerows at up to 3m during operation is necessary to provide effective screening and ecological benefits. However, the Applicant agrees that there may be scope for future management to respond to the prevailing landscape character at the point of decommissioning, and this would need to be appropriately considered at that stage in consultation with the relevant landowners and any other stakeholders. It is not considered necessary or appropriate to prescribe a fixed post-decommissioning height at this stage. The Applicant also acknowledges the Council's suggestion regarding advance planting. Mitigation planting will be undertaken as early as reasonably practicable, taking account of construction phasing and good practice. However, there are practical and environmental constraints which limit the extent to which advance planting can be implemented, including the need to coordinate planting within a 30-month construction programme, the requirement for planting to be undertaken during the appropriate planting season (typically November to March), and the need to source substantial volumes of planting stock.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	ii. Construction impacts on landscape character would occur over a 30-month period and arise from: construction of solar arrays within largely arable fields; excavations associated with the underground cable connections; construction of new access roads; erection of temporary construction fencing and permanent boundary fencing and temporary lighting required primarily in winter months (not overnight). During construction there would also be some very localized clearance of existing hedgerow. iii. Overall, the construction operations would be highly visible within both LCA 1B Riseley Clay Farmland and the Southern Wolds LCA and would give rise to a localized, but significant, change to landscape character for the 30-month duration of the construction works. iv. Table 2.1 of ES Appendix 5-5: Effects on Visual Receptors provides the assessment of visual effects on residents assessed within the study area, with reference to relevant viewpoint assessments. v. In construction, moderate to major adverse (significant) effects on the visual amenity of residents would occur at: R9 – Properties on Great Staughton Road, east of Green End; R10 - Hoo Farm; R12 – Row of properties off the B660; R17 – Northern side of the southern extent of Green End; R19 - Lodge Farm; R20 - Rectory Farm; R21 – Home Close and Little Hollow Cottage; R22 - The Kangaroo; R23 – New Farm; R25 – Garden Farm and Garden Cottage; and at R31 - Pastures Farm. vi. Table 2.2 of ES Appendix 5-5: Effects on Visual Receptors summarises the assessment of visual effects on people using the public rights of way assessed within the study area. The number of PRoWs adjacent to or within the solar arrays reflects the degree to which recreational users of them would be impacted in construction.	Whilst early planting will be pursued where feasible, it is not possible to commit to widespread advance planting across the Site. The proposed approach nevertheless ensures that mitigation will establish progressively and deliver the assessed reduction in effects by Year 10, as set out in the LVIA. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s).

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	vii. In construction, major adverse (significant) effects on the visual amenity of recreational users of PRoW would occur at: Footpaths 34 and 35 and Bridleway 37 and 40; Footpaths 4, 8, 13, 26, 47; Footpaths 5 (Little Staughton parish) and 213/1; Footpaths 112/5, 112/6, Bridleway 112/7 and 112/8; and Footpaths in the vicinity of Little Staughton / Green End. viii. Moderate to major adverse effects on the visual amenity of recreational users of PRoW would occur at: Footpaths A3, 2, 32, 11 and 12; Footpaths 1, 5, 19; and Footpaths 213/3 and 213/28. ix. For people in vehicles on local roads impacts would be non-significant, reflecting lower sensitivity and duration of likely views. Similarly, effects on employment sites E1-E3 would be non-significant. **Mitigation 1: Construction Phase** a) Mitigation typically consisting of additional tree and hedgerow planting located on the boundaries of the site, as set out in Tables 2.1-2.4 within ES Appendix 5-5: Effects on Visual Receptors will be immature or absent during construction. b) The Councils consider that consideration should be given to advanced planting of mitigation, where this does not conflict with construction activity, so that there is a greater degree of maturity in Year 1 of operation. c) Mitigation of landscape and visual effects in construction will be in accordance with [APP-155] 7.3 Outline Construction Environmental Management Plan P01 and [APP-156] 7.4 Outline Construction Traffic Management Plan P01. **Impact 2: Operational Phase** a) **Positive:** no positive landscape or visual impacts arising from operation of the Proposed Development have been identified, reflecting that the significant operational impacts on landscape	

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	character and visual amenity would occur through alteration of some of the key characteristics of LCA 1B Riseley Clay Farmland and the Southern Wolds LCA within which the main development will be located. b) **Neutral:** there would be a neutral effect on LCA 4A Great Ouse Clay Valley in operation and for various viewpoint locations and receptor groups: VP4 Church of St Nicholas in Swineshead; VP22 Church of St Peter in Pertenhall; VP29 Church of St Mary the Virgin in Keysoe; 79 Junction between B645 and High Street at Hail Weston; VP80 Duloe Road VP81 Footpath 23 (Parish of Staploe); and VP82 Footpath 8A (Parish of Staploe) at the Eaton Socon Substation. c) **Negative**: i. All residential receptors identified as experiencing significant visual effects during the operational phase are either individual properties, or small groups of properties, located close to the Order Limits. ii. No significant visual effects have been identified on residential receptors located directly within the villages located within the study area. iii. The residential receptors that would be subject to a significant visual effect at Year 0 during operation are as follows: R9 Properties on Great Staughton Road, east of Green End; R10 Hoo Farm; R12 Row of properties off the B660; R23 New Farm and R25 Garden Farm and Garden Cottage. iv. The establishment of tree and shrub planting mitigation, primarily as hedgerows, would reduce the level of effect at residential locations, such that the residual effect at Year 10 is Not Significant. v. The multiple effects on rights of way identified as being subject to significant visual effects during Year 0 of operation reflect the dense network of rights of way within the study	

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	area which provides connections between farms and small settlements. Significant visual effects in Year 0 of operation therefore typically relate to relatively short distance footpaths which form part of a network of rights of way in and around fields and small settlements within the Site. vi. Some significant visual effects on users of rights of way would remain at Year 10, particularly from rights of way directly adjacent to the Site. There would be a residual change to the level of openness in views and as such the significant visual effects would remain. vii. The following are rights of way receptors which have been identified as experiencing a significant visual effect at Year 10: Bridleway 37 and 40 and Footpaths 34 and 35, which are located directly within the southern extent of Site A; Footpaths 4, 8, 13, 26, 47, which are located directly within Site B; Footpath 5 and 20 are located on rights of way situated on slightly elevated ground, close to Pertenhall, at least 1km north of Sites A and B and the residually significant effect on each of these rights of way is due to the extent of the solar array which would be evident in a single view due to Sites A and B; Footpaths 5 and 213/1 are located on rights of way situated on slightly elevated ground, close to Little Staughton, within 1km south of Site B and the residually significant effect on each of these rights of way is due to the extent of the solar array which would be evident in a single view due to Site B. viii. No community receptors have been identified as experiencing a significant visual effect during the operation of the Proposed Development. Similarly, no road receptors or people at employment sites have been identified as experiencing a significant visual effect during the operation of the Proposed Development.	

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	Mitigation 2: Operational Phase a) [APP-121] Figure 2-1: Illustrative Environmental Masterplan shows the proposed landscape and visual mitigation for the Proposed Development. The landscape proposals are tailored to the location and required functions of each part of the Proposed Development, noting that these change across the Site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where possible, especially for visual receptors, at the edges of settlements and along routes and PRoW connecting settlements. b) Mitigation typically consisting of additional tree and hedgerow planting located on the boundaries of the site, has been used to further screen the solar array within the Proposed Development, as set out in Tables 2.1-2.4 within ES Appendix 5-5: Effects on Visual Receptors. c) At Year 10, the mitigation proposed, is assumed to have established to a reasonable level of maturity such that the Proposed Development would be more suitably integrated into the view from most visual receptors, including from residential properties and for rights of way users, the two main groups of people impacted by the Proposed Development. d) The OLEMP states that hedgerows will be managed at a height of 3m, to screen the development and provide ecological benefits. The Council accepts that this is a reasonable mitigation strategy in operation but consider that post decommissioning the presence of tall hedgerows in this context would in itself be a change in landscape character and consider that the post decommissioning height of hedgerows forming field boundaries should be reduced to 1.5m height over a phased 3 year rotational cut, in order to	

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	more closely match the baseline landscape of LCA 1B Riseley Clay Farmland and the Southern Wolds LCA. **Impact 3: Decommissioning Phase** a) Positive: i. The end of decommissioning there would likely be a residual minor beneficial effect on landscape character of the two main host LCAs, LCA 1B and Southern Wolds LCA as there would be enhanced field structure within the Site due to the mature hedgerow and tree cover left by the Proposed Development. ii. The Councils considers that this would be dependent on delivery of a review and phased implementation of modification of hedgerow heights from the 3m height necessary in operation to a managed height of 1.5m, more typical for the agricultural context. Managed reduction of hedgerow heights should commence during decommissioning and continue on a rotational basis over a 3-year period, to provide nesting continuity for birds. b) **Neutral:** as described for construction. c) **Negative:** decommissioning effects in relation to landscape character and visual amenity would largely mirror those in construction but with a reduced magnitude due to enhanced screening delivered by the mitigation Proposed Development. There would be temporary adverse effects during the removal of the Proposed Development which would be similar to those reported during construction, i.e. that there would be Moderate to Major Adverse levels of effect on the two main host LCAs, LCA 1B and Southern Wolds LCA. **Mitigation 3: Decommissioning Phase** a) As set out above, a permanent change in hedgerow heights to 3m is considered contrary to the baseline rural context and hence a	

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	negative effect, that can be mitigated by post operational rotational reduction in hedgerow heights. **Contractual (all Phases):** measures to be secured through the relevant Management Plans: in this way the impact(s) would be addressed – potential long-term neutral impact.	
6.14	Matter 11 Legacy: while the Council broadly agrees with the [APP-009] Design Principle 7: 'The Scheme will seek opportunities to leave a positive legacy through the delivery of multiple social and environmental benefits' this requires confirmation that at the decommissioning phase the landscape, habitat, and PRoW enhancements are to be retained when handed back to the landowner (as suggested in [REP1-040] Chp 7.0). If this were not to be the case, then these enhancements should not be afforded full weight in terms of planning benefits. It is suggested that this matter is discussed at Examination. **Matter 11 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale):negative impact. b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: i. The Council requires clarity as to what landscape, habitat, and Public Highways (PRoW) are to be temporary, 'permissive', and/or permanent. ii. Applicant to table a 'worst-case' scenario where all permissive routes, landscape and habitat areas as delivered by the Applicant are removed by the landowner post 40-years to give an understanding on the loss of landscape and habitat areas (created and established), and mitigation measures that may be required to retain/ re-establish the policy-identified Landscape Characters.	The Applicant notes that the land will predominantly be leased for the operational phase and, following decommissioning, will be returned to the landowners in accordance with the relevant commercial agreements. For that reason, the Applicant cannot provide an absolute commitment that all enhancements will be retained in perpetuity once the land has been handed back to landowners. Notwithstanding the above, paragraphs 7.1.2 and 7.1.3 of the oLEMP **[REP1-040]** confirm that proposed native species woodland and woodland belt planting, proposed native species hedgerow planting, and proposed native species individual tree planting would be retained at decommissioning and handed back to landowners as mature landscape features, and it is assumed for the purposes of assessment that these features would be retained thereafter. Paragraphs 7.1.4 to 7.1.6 **[REP1-040]** set out that other elements (including proposed grazing pasture or neutral grassland and species-diverse grassland, and ecological enhancement features) would remain on site at decommissioning but their future retention would be at the discretion of the landowners once the land is handed back and the development consent order terminates. At the heart of this application is the fact that this is a temporary planning consent. In relation to PRoW, the permissive paths would be provided for the lifetime of the Scheme but would again be at the discretion of landowners as to whether they are retained post-decommissioning. The Applicant has identified environmental enhancements and improved access as Scheme benefits within Section 5 of the **Planning Statement [APP-031]**, in

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	iii. Clarification of intent leading to a re-assessment of the development's suggested public benefits. d) **Contractual:** once concluded, all elements to be secured through the DCO Agreement [APP-016] [App-017] and the various Management Plans: – potential positive impact (if retaining) or significant negative impact (if removed).	line with NPS EN-1's (EN-1, para. 4.1.5) direction that decision-making should weigh adverse impacts against benefits including 'environmental enhancements' and 'any long-term or wider benefits'. However, the **Planning Statement [APP-031]** also makes it clear that these benefits are assessed as being delivered for the duration of the Scheme's operational lifespan. In particular, it records at paragraph 8.3.34 that the operational ecology benefits "*would be realised for the duration of the Scheme's operational lifespan (40 years)".* The planning balance presented by the Applicant is therefore not contingent on permanent retention beyond decommissioning. Once the Scheme is decommissioned and removed, the Scheme-related effects which the mitigation and enhancements are designed to address would no longer arise; the planning weight therefore reflects the fact that both the harms and the associated mitigation and enhancement framework are tied to the operational lifetime, and that it would not be the actions of the Applicant or the Scheme to remove such enhancements following decommissioning. Similarly, on that basis, it is considered beyond the scope of the assessment and indeed, disproportionate to consider a scenario where everything is removed by the landowner's post decommissioning. Therefore, for the reasons stated, the Applicant does not agree that a negative effect would result if landscaping is removed following decommissioning, such a conclusion is speculative and beyond the scope of assessment for the Scheme.

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7.1	Matter 12 Airfields: the Council raised two concerns in their Scoping Report (2023) regarding this aspect, namely, the requirement to assess the wider impacts of energy projects (e.g. solar farms) on Thurleigh Airfield (Bedford Aerodrome) and Little Staughton Airfield, as set out in Local Plan Policy 57(ix) Aviation, (xi) Glint & Glare, and (xiii) Aviation; and, in relation to the Airfield Safeguarding Zones set through regulatory oversight by the Civil Aviation Authority. It is noted that both airfields are still designated as operating airfields. In the Applicants [APP-074] ES Glint and Glare Assessment Vol2 Part 1 Table 5 *'aerodromes within 30km'* of the Scheme, both airfields above are not identified which is suggested as a significant oversight. It is suggested that this is addressed at Examination **Matter 12 (LIR):** - as identified and assessed: a) **Impact (**construction, operation, replacement phases; local scale) potential negative impact unless resolved b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** assessment of effect leading to potential mitigation measures. d) **Contractual:** to be secured through the relevant Management Plans: – potential neutral impact.	**ES Vol 2 Appendix 5-6 Glint and Glare Assessment) [REP1-016 – REP1-021]** was updated at Deadline 1 to include both Bedford Aerodrome and Little Staughton Airfield. The updated assessment concludes that all impacts upon the airfields fall in line with FAA guidance and are acceptable and not significant when accounting for the types of aircraft, the time of impact, operating hours, likely landing directions due to wind, daily glare duration periods, ground elevation profile, and pilot mitigation strategies. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s), they also agree that following the above measures there would be a neutral effect.
7.3, 7.4	Solar reflection: solar reflections are possible at 112 of the 174 residential receptors assessed within the 1km study area (it is not possible to read the report in a way to easily understand which of these receptors are Bedfordshire based receptors). In reviewing the actual visibility of the receptors, glint and glare impacts remain High at four receptors, Low at one receptor and reduce to None for 169 receptors. Once mitigation measures as proposed are taken into consideration the impacts of all residential receptors are reduced to None. Therefore, overall impacts on residential receptors are considered to be None. Mitigation measures proposed in the report	The Applicant notes this comment. The mitigation measures set out in **ES Vol 2 Appendix 5-6 Glint and Glare Assessment [APP-074]** are reflected in Appendix A of the **oLEMP [APP-159]** and secured through Requirement 4 of the **draft DCO [REP1-005]**, which requires a detailed LEMP to be submitted to and approved by the relevant local The mitigation measures set out in **ES Vol 2 Appendix 5-6 Glint and Glare Assessment [APP-074]** are secured by Appendix A of the **oLEMP [REP1-040]**.

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	need to be implemented to ensure residual impacts are achieved and therefore glint and glare is not an issue in the operational phase. However, beyond the above statement, the Council notes that they do not have the necessary professional and/or technical discipline relating specifically to solar farms applications to respond on this aspect in any greater detail. On this basis, the Council will not be raising any objection regarding this Glint and Glare aspect at Examination.	
8.1	Archaeology: the assessment of the archaeological potential of the Site is still at an early stage. The archaeological evaluation work should be completed ahead of the DCO submission. The results of the archaeological evaluation should be used to inform a detailed archaeological mitigation strategy for the Scheme that will ideally be agreed with the relevant Host Authority ahead of the submission of the DCO. Dependent on the results of the evaluation the illustrative masterplan provided will also require updating to reflect necessary design changes. Further information is also required regarding potential impacts at the decommissioning stage of the development (Ref. PEIR Report, 2024). This PEIR matter has been addressed in the DCO Application	The Applicant welcomes the Council's acknowledgement that this matter (raised at statutory consultation) has been addressed through the Application. The Applicant notes that the **oAMS [REP1-048]** highlights that further stages of archaeological evaluation work should be completed with paragraphs 5.3.1 and 5.3.2 **[REP1-048]** '*the archaeological brief jointly issued by CHET and BBHET required two phases of archaeological investigation prior to construction. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken…the general aim of these investigations… is to more accurately establish the potential for the presence/absence of archaeologically significant remains allowing the mitigation measures set out in Section 6.0 to be applied appropriately'.* Paragraph 5.4.2 [**REP1-048**] highlights that '*a WSI for this additional trial trenching will be developed in line with a new brief prepared by CHET and BBHET*'. The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, in order to finalise the archaeological mitigation measures to be embedded into the detailed design of the Scheme (including decommissioning) and is committed to ensuring the final Archaeological Mitigation Strategy is updated in consultation with BBHET at each stage of investigation.

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		A final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the oAMS prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO [REP1-005]**. The final AMS must be submitted to and approved by the relevant council in consultation with the county archaeologist and Historic England.
8.2	Cultural Heritage: in summary, the Council disagree with the findings of the PEIR in relation to the impact on All Saints Church, and whether or not a 'significant impact' is likely to arise.	The Applicant acknowledges that the Council disagrees with the findings of the PEIR in relation to the impact on All Saints Church. The impact upon the church is discussed in more detail in the Applicants response to paragraph 8.6 of BBC's LIR below. The Applicant notes and welcomes the Councils agreement that the other matters raised in this comment (provision of settings assessment table and assessment of neutral impacts) have been addressed in the DCO Application.
8.3	The Council has reviewed the following [APP-042, APP-080 to 090, APP-143 to 144, APP-166 to 167] Cultural Heritage and Archaeology and make the following comments:	No comment.
8.4	Heritage impact: the Scheme (associated with East Park Sites A and B) would affect the significance of a number of heritage assets located within Bedford Borough, particularly those located within or close to Pertenhall, Keysoe and Little Staughton. Chapter 6 of the ES [APP042], which is informed by the 'Settings Impact Assessment' [APP-083], summarises the likely significant effects on designated heritage assets located within a 3km radius of the Site. The methodology for the assessment is set out in Chapter 6.4 of [APP-042], including the matrices that inform the 'significance of effect' summary table (Table 6.8, p.109) – generally the methodology outlined is considered acceptable.	The Applicant notes and welcomes that the Council agrees that the methodology set out in Section 6.4 of **ES Vol 1 Chapter 6 [APP-042]** including the matrices that inform the *'significance of effect'* summary table (Table 6.8, p.109) are considered acceptable.

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8.5	Adverse impact: [APP-042] Para6.8.54 predicts a minor or 'not significant' temporary adverse effect on the significance of Assets 19, 24, 27, 28, 40, 41, 48, 129, 134, 136, 148, 149, 154, and 755 during the circa 30-month construction phase. The Council agrees with this observation. During the 40-year operational phase (read to include replacement works), a minor or 'not significant' adverse effect is predicted in paragraph 6.8.62 for Assets 19, 27, 28, 38, 40, 41, 48, 129, 134, 136, 148, 149, 154, 160, 332, and 755. Aside from the 'Church of All Saints' (Asset 38, see below), this assessment is also agreed with – whilst there is some disagreement with how the 'relative sensitivity' has been applied for some assets in [APP-084], this has not led to 'significant effects' being missed. Particular consideration has been given to the likely impact on the significance of 'Church of St Peter' in Pertenhall (Asset 48) – the spire of the Grade I listed Church is a feature above the surrounding tree canopy in views from the site. However, due to topographical factors (the Church is set on low ground), the presence of intervening planting (much of it protected by TPOs) and the proposed buffer provided by grassland adjacent to Footpaths 10 and 11 to the west, it is considered that the Scheme will result in a minor level of less than substantial harm to its significance and it is therefore agreed that the effect would not be 'significant' in EIA terms.	The Applicant notes and welcomes that the Council is in agreement with the assessment of minor or '*not significant'* temporary adverse effects (during the construction phase) upon Assets 19, 19, 24, 27, 28, 40, 41, 48, 129, 134, 136, 148, 149, 154, and 755 as is summarised in paragraph 6.8.56 of **ES Vol 1 Chapter 6 [APP-042].** The Applicant notes and welcomes that the council is in agreement with the assessment of minor or '*not significant'* operational phase effects upon Assets 19, 27, 28, 38, 40, 41, 48, 129, 134, 136, 148, 149, 154, 160, 332, and 755, as summarised in paragraph 6.8.62 of **ES Vol 1 Chapter 6 [APP-042].** The Applicant acknowledges that the Council disagrees with the findings of the assessment in relation to the impact on All Saints Church (Asset 38). The impact upon the church is discussed in more detail in response to paragraph 8.6 below. The Applicant further acknowledges the Council's comments that although there is some disagreement with how relative sensitivity has been applied for some assets, they do not believe any other '*significant effects'* have been missed. The Applicant notes and welcomes that the Council is in agreement with the assessment of minor or *'not significant'* effects upon the significance of *'Church of St Peter'* in Pertenhall (Asset 48).
8.6	Matter 13 All Saints Church: the Council's singular area of disagreement on setting impacts relates to the likely effect on Asset 38, the Grade I listed 'All Saints Church' in Little Staughton; namely: a) It is agreed with the first bullet point of para 6.8.56 in [APP-042] and p.74 of [APP-083] that the construction phase will result in a 'moderate effect' on its significance, which would amount to a 'significant effect' in EIA terms, albeit temporary. However, the ninth bullet point of para 6.8.62 of [APP-042] concludes that the operational phase of the development	The Applicant acknowledges that the assessment of impacts upon All Saints Church (Asset 38), as set out on pages 74 to 77 in **ES Vol 2 Appendix 6-4: Settings Impact Assessment** [**APP-083**], is the singular area of disagreement with the Council in relation to heritage settings impacts. The Applicant has responses to each of the Council's comments in turn below. The Applicant welcomes that the Council agrees with the construction phase assessment of a moderate effect upon the church, which would amount to temporary significant effect in EIA terms, as summarised in paragraph 6.8.56 of **ES Vol 1 Chapter 6** [**APP-042**].

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	(read to include replacement works), would result in a minor adverse effect, which is 'not significant' in EIA terms. b) The Council's comments at the PEIR stage regarding All Saints Church can be found at pp.35-7 of [APP-028]. Setting makes an important contribution to the asset's significance, and the introduction of large numbers of solar panels within the Scheme Site B as indicated in [APP-121] would seriously erode the asset's historic rural setting towards the north and northwest. In particular, the panels shown located within the two fields south of New Farm c.850m to the north of the Church will have an impact both on views of the spire from within the churchyard as well as views out from the churchyard north of the nave (only partly reflected in Viewpoint 52, [APP-138]). The wider proposed Scheme would also feature on the approach to the asset along Church Lane and from the southern points of Footpaths 1 and 5 in close proximity to the Church (see Viewpoint 51 [APP-138]); as well as from the historic footpath running east towards 'The Old Manor House, Cretingsbury' SM (Viewpoint 54 [APP-139]). Additionally, the Scheme would form part of one's experience of the Church from its wider setting to the north and northwest, including from Footpath 1 south of New Farm both within and outside the Site. Whilst the panels would not "[compete] with it as a landmark feature" (para6.8.62 of [APP-042]) in views of the asset, they would alter the landscape within which All Saints Church sits as the most significant, prominent feature. Given the change in levels, proposed planting within the Scheme would have little mitigating effect in views out from the ridge. Furthermore, the partial reliance on the retention of mature planting around the churchyard in the setting assessment (p. 76 of [APP-083]) seems short-sighted given the lifespan of the Scheme and the potential for a variety of scenarios which may affect	The Applicant acknowledges that the Council disagrees with the operational phase assessment of a minor effect upon the church, which would not be significant in EIA terms, as summarised in paragraph 6.8.62 of **ES Vol 1 Chapter 6** [**APP-042**]. The Applicant notes the Council comment regarding the important contribution that setting makes to the asset's significance, and has acknowledged the importance of this by assigning the asset as having a high relative sensitivity to changes to its setting during the assessment as shown on page 74 of **ES Vol 2 Appendix 6-4: Settings Impact Assessment** [**REP1-022]** The Applicant acknowledges that the Council believe that the solar panels within Scheme Site B would result in a serious erosion of the asset's historic rural setting to the north and northwest highlighting that the panels shown to the north of New Farm would appear in both views of the spire from within the churchyard and from the churchyard north of the nave. The Applicant has acknowledged that views of solar development within the easternmost parts of Site B parts will be possible from within parts of the churchyard, as set out on page 76 in **ES Vol 2 Appendix 6-4: Settings Impact Assessment** [**REP1-022**] which would affect the church's historic rural setting to the northwest. The Applicant would highlight, however, that in views from the church and churchyard the rest of the asset's historic rural surroundings (i.e. not to the immediate north and northwest) would be unaffected by the development during the operational phase due to the design utilising the existing screening provided by topography, mature vegetation and existing buildings within Little Staughton. The Applicant also notes the Council's position in relation to the visibility of the solar panels within the eastern part of Site B from footpaths in close proximity to the church and the Council's assessment that they would alter the landscape within which All Saints Church sits as the most significant, prominent feature. The Applicant provided further information in relation to views from surrounding public rights of way within paragraphs 5.6.27 to 5.6.41 of the **Design Approach**

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	existing, unprotected planting; which does not in any case currently fully screen views out towards Sites A and B, especially in winter months. c) Factoring in the lack of a direct impact on the asset or a 'blocking' effect on existing key views, the Scheme would result in 'less than substantial' harm to the significance of the asset, likely around the mid-point of that range (low to high). Noting its Grade I listed status, and the lack of further mitigation measures proposed by the Applicant, this would amount to a 'significant effect' in EIA terms. This likely effect, alongside the 'not significant' effects identified within the [APP-042] Environmental Statement, should be weighed against the public benefits of the Scheme in accordance with paragraphs 5.9.32 and 5.9.36 of EN-1. It is suggested that this matter is discussed at Examination.	**Document** [**APP-034**] which demonstrates the design approach to mitigating setting impacts upon the church. The Applicant notes that in views from the footpath that runs north/south towards the church it was highlighted that from distant positions any visibility of the church is obscured by adjacent mature hedgerows, with the southernmost parts of the footpath affording a clearer view towards the church that, by design, would not include any solar infrastructure as set out on page 76 in **ES Vol 2 Appendix 6-4: Settings Impact Assessment** [**APP-083**]. The Applicant also acknowledges that views taken from the public footpath to the east of the church would include views of the solar development in the eastern part of Site B as set out on page 76 in **ES Vol 2 Appendix 6-4: Settings Impact Assessment** [**APP-083**]. The Applicant considers this view, from east of the church and containing a backdropped view of the elements of the Scheme in the northern part of Site B (with very limited glimpse of elements within Site A) to represent the largest and worst case change to any views within which All Saints Church sits as the most significant, prominent feature and would reiterate that in this view the *'solar development would change the character of some of the lower lying, currently arable, landscape to the northwest of the Church'* but that this does not compete with the prominence of All Saints church as the most significant feature. The Applicant agrees with the Council's comments that the proposed planting within the Scheme would have little mitigating effect in views out from the ridge due to the difference in elevation. The Applicant notes the Council's comments on the *'over reliance'* on the mature planting around the churchyard in the setting assessment (as set out on page 76 of [**REP1-022**]). The Applicant considers that the current mature planting surrounding the churchyard creates a demarcation of a space within which the intimate setting of the churchyard can be appreciated, as well as enhancing the experience of the church as a sanctuary and place of memorial and reflection. This existing vegetation is, therefore, considered to be making a positive

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		contribution to the significance of the Church and, therefore, any future removal would comprise a negative impact. The Applicant notes the Council's comments that views of Site A are not currently fully screened from the Church of All Saints but would highlight that there would be extremely limited visibility of any elements of the Scheme within Site A, as is illustrated in VPs 51 and 54. The Applicant would also note that it is not just the mature vegetation lining the churchyard providing screening, but also the nearby topographic ridge, buildings and vegetation within Little Staughton that provide screening in westward views from the churchyard. These factors would also provide full screening of most of the areas within the southern parts of Sites A and B. The Applicant notes that the disagreement outlined above with regard to the assessment of impacts upon the setting of the Church of All Saints are based upon a differing professional opinion in relation to the contribution that views from the church and churchyard make to its overall cultural significance. The visibility of parts of the Scheme (largely limited to solar development within the eastern part of Site B) in these views are not disputed by the Applicant. The Applicant has assessed that the greatest contribution that the church's setting makes to its cultural significance is related to its legibility in the landscape as a highly visible landmark feature (which was a key factor in its siting to allow for distant visibility), with outward views from it making a lesser contribution. The church itself is set towards the northeastern end of its churchyard which is bordered on all sides by a hedgerow (with a break along the northern edge) with mature trees to the northwest and northeast. The demarcation of this space allows for an appreciation of the intimate setting of the churchyard which would have been primarily established to create an area within which the architectural detailing and materials of the church and funerary monuments can be appreciated, as well as enhancing the experience of the church as a sanctuary and place of memorial and reflection. The Applicant considers that views

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		outwards from the churchyard, therefore, make a lesser contribution to the church's overall cultural significance. The Applicant thereby stands by the assessment of a Low impact during the operational phase upon the setting of the church, as is defined in the assessment methodology as *'Alterations to the asset's baseline setting, which do not affect the ability to understand, appreciate or experience the contribution that setting makes to the asset's overall significance. The key characteristics of the setting are not eroded'* as set out in Table 6.7 of **ES Vol 1 Chapter 6** [**APP-042**]. The Applicant would highlight that a medium impact (which would result in a significant effect in EIA terms) is defined in the methodology as an '*Alteration of an asset's baseline setting that effects the ability to understand, appreciate and experience the contribution that setting makes to the significance of the asset to a degree but whereby the cultural significance of the monument in its current setting remains legible'* as set out in Table 6.7 of **ES Vol 1 Chapter 6** [**APP-042**]. The Applicant does not believe that the key characteristics of the church's setting (which are considered to be its prominent position along the ridgeline and its consequent visibility from the surrounding areas) would be eroded or that the ability to understand, appreciate or experience the contribution that setting makes to the church's overall significance has been affected. Finally, the Applicant would also highlight that despite the difference in professional opinion above, the Council's position in relation to the assessment of *'less than substantial harm'* is very similar to the Applicant's. Where the Council have suggested that the Scheme would result in *'less than substantial harm'* at the mid-point of that range the Applicant has assessed that the Scheme would result in *'less than substantial harm'* at the *'low to mid end of the scale'* as set out in paragraph 6.8.63 of **ES Vol 1 Chapter 6** [**APP-042**]. The Applicant acknowledges the Council's comment that the likely effects upon heritage assets (both significant and non-significant) would need to be weighed

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		against the public benefits of the Scheme, in accordance with paragraphs 5.9.32 and 5.9.36 of NPS EN-1.
	Matter 13 (LIR): - as identified and assessed: a) **Impact** (all Phases; local scale): negative impact harm to setting of designated heritage assets as referred to above, and harm to setting of All Saints Church -'significant effect' in EIA terms; b) Neither positive nor neutral impacts are identified c) Mitigation measures: i. Applicant to review increased landscape buffer width, introducing layered planting including semi-mature trees planting, potentially reviewing additional structured planting in effected view lines, et al to further mitigate the identified harm on the setting of the listed building; and, ii. There remains concern that the increased landscape buffer is going to offer limited mitigation due to the change in levels (the church and churchyard overlooks the Site) - in fact, increasing the buffer or the height of planting is going to affect the efficiency of the panels (the panels will face back towards the south and the church). Consequently, the Council is of the position that the only way the Applicant could reduce the impact to a 'not significant' effect would be to remove the proposed panels within the fields south of New Farm. d) **Contractual:** to be secured through the relevant Management Plans: – residual negative impact.	The Applicant has already prepared a comprehensive response on the matter of All Saints Church in response to paragraph 8.6 of the Council's LIR above. As set out in the response above, whilst there appears to be a difference of professional opinion on this matter, for the reasons stated above, the Applicant maintains their conclusions regarding the operational phase effects of the Scheme in the context of All Saints Church. Accordingly, they do not consider it to be necessary to remove panels from the southern part of Area B to mitigate for an operational phase setting effect on the Church. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) it is also agreed there would be a residual negative effect but, for the reasons stated, the extent of the effect is not agreed. The Applicant maintains the Scheme would not result in a significant effect in EIA terms.
8.7	Matter 14 Mitigation measures: [APP-042] Chp. 6 Section 6.6 details the results of the archaeological evaluation undertaken prior to submission. Interim reports on Sites A and B within Bedford Borough are included in the technical appendices but were not provided in advance of submission and therefore have not been subject to detailed review for errors at the time of writing [APP-087 and APP-	The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, in order to establish the archaeological mitigation measures to be embedded into the detailed design of the Scheme (including decommissioning) and is committed to ensuring the final Archaeological Mitigation Strategy is updated in consultation with BBHET at each stage of investigation.

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	088]. Aside from not providing adequate time to review the interim evaluation reports, the Council is satisfied that the Applicant has carried out the first stage of the evaluation in accordance with the approved strategies. Further to this, the Council is in agreement that the archaeological remains revealed to date are of no more than regional significance and do not represent an overriding constraint on the Scheme. However, the identified remains do hold significant potential to address research aims drawn from the East of England Regional Research Framework and therefore suitable mitigation measures will need to be agreed prior to development proceeding.	Results of all archaeological investigations associated with the Scheme will consider addressing research aims drawn from the East of England Regional Research Framework. The final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the **oAMS [REP1-048]** prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO [REP1-005]**. The final AMS must be approved by the relevant council in consultation with the county archaeologist and Historic England.
	Matter 14 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): negative impact b) **Caveated** - it is noted that there are negative impacts (e.g. the loss/partial loss of archaeological remains), but also positive impacts (e.g. the knowledge gain from archaeological fieldwork allowing Officers to answer questions in the regional research framework, the public engagement opportunities etc.). c) **Mitigation measures**: i. Subject to the full evaluation being complete and assessed, mitigation measures as identified and agreed with the Council put in place. ii. The identified remains hold significant potential to address research aims drawn from the East of England Regional Research Framework and therefore suitable mitigation measures will need to be agreed prior to development proceeding. iii. Parties should set out, agree, and conclude research aims, drawn from the East of England Regional Research Framework, which on conclusion should be submitted to the Council for review and possible measures for adoption. iv. Inclusive within such agreement should be a funding mechanism to allow the Council/ local planning authority(s) to	Please refer to the Applicants response to paragraph 8.7 of BBC's LIR above. It is noted that both here and other points the Council has requested funding is provided to fund the council in both the discharge of requirements and longer-term monitoring, which is to be the subject of a s.106 agreement. The Applicant acknowledges that the monitoring and enforcement of the DCO requirements will involve an ongoing resource commitment for the Host Authorities. However, the Applicant does not consider that a section 106 agreement would be an appropriate or necessary mechanism in this case. Rather, a framework Planning Performance Agreement covering the post consent phase is considered to be the appropriate and well-established mechanism to ensure that the Host Authorities are adequately resourced to carry out their monitoring and enforcement functions . With specific regard to the discharge of requirements. The Applicant would be required to submit applications to the relevant council to discharge the requirements; the procedure for this is set out in Part 2 of Schedule 2 of the draft DCO **[REP1-005]**. The Applicant would be required to make separate or parallel applications to each relevant host council for the phase within its area, unless the requirement or application relates only to land in one authority's area. The

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	review and discharge and obligations associated with such studies/ planning requirement. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and a FINAL Archaeological Mitigation Strategy [App-166] and Heritage Enhancement Strategy [APP-167]: – neutral impact after mitigation (caveated regarding the strategy post the decommissioning phase).	draft DCO does not allow for a 'lead authority' type mechanism that exists with TCPA 1990 applications. Requirement 22 of the draft DCO **[REP-1-005]** requires the Applicant to consult with any person or body identified in the Order or by statute before making an application to discharge a requirement, which ensures that technical engagement takes place before a submission is made to the council, which is intended to reduce the burden on the council. Paragraph 27 of Part 2 of Schedule 2 of the draft DCO [REP1-005] further provides that where an application to discharge a requirement is made to the relevant authority, the Applicant must pay the requisite fee for submitting the application to the local planning authority. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that there would be aa neutral effect following mitigation.
8.8	Matter 15 Evaluation trenching: the Council notes that the evaluation trenching undertaken to date represents only the first phase of trenching. A significant amount of additional trenching will be required in order to fully understand the archaeological potential of the Site and agree appropriate mitigation measures. The Council is of the opinion that [APP-042] Chp. 6 Section 6.6 is overly confident in assessing the potential of these areas prior to this trenching taking place. This consequently requires further discussion	The Applicant notes the Council's comments that the evaluation trenching undertaken to date only represents the first phase of trenching and would highlight that the **oAMS [REP1-048]** notes that further stages of archaeological evaluation work will be completed, with paragraphs 5.3.1 and 5.3.2 **[REP1-048]** stating that: *the archaeological brief jointly issued by CHET and BBHET required two phases of archaeological investigation prior to construction. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken…the general aim of these investigations… is to more accurately establish the potential for the presence/absence of archaeologically significant remains allowing the mitigation measures set out in Section 6.0 to be applied appropriately.* The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, which in the first instance would involve the second phase of trial trenching which, as outlined in paragraph 5.3.1 of the

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		oAMS [**REP1-048**] *'would be undertaken in line with archaeological brief jointly issued by CHET and BBHET'*. The Applicant respectfully disagrees with the Council's opinion that there has been over confidence in the assessment of archaeological potential with Section 6.6 of **ES Vol 1 Chapter 6** [**APP-042**] and would highlight that paragraphs 6.6.14 and 6.6.25 acknowledge that there '*is a Low potential for archaeological remains of any date in the areas without recorded anomalies or archaeological features'* within Sites A or B but notes *'that the potential for remains cannot be entirely discounted'.* Paragraph 6.6.29 [**APP-042**] acknowledges that within the Cable Corridor - Site B to Site C *'further investigation, in the form of trial trenching, may further revise this assessment of potential'*. A final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the oAMS prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO [REP1-005]**. The final AMS must be approved by the relevant council in consultation with the county archaeologist and Historic England.
8.9	Matter 16 [APP-166] Outline Mitigation Strategy: the Council were consulted on a draft version of an Outline Mitigation Strategy and provided feedback with recommendations for amendments. In review, these recommendations have not been fully addressed in the submitted document [APP-166]. Section 6.1.4 contains Table 1 detailing the proposed mitigation measures for areas of archaeological significance identified by the trenching completed to date - the vast majority of these measures relies on the utilisation of No Dig solutions. Further detailed discussions will need to take place to assess the impacts of the proposals together with the depth of overburden identified within the trenching. It is not uncommon for No Dig solutions to actually involve some excavation (for example on sloping sites that require terracing for the concrete feet) that will	The Applicant notes the Council's comments that further detailed discussions will be required regarding the **oAMS** [**REP1-048**] and are committed to working in consultation with BBHET as to the detailed design of the Scheme and implementing alternative mitigation measures where No Dig solutions are not feasible. It is understood that the **oAMS [REP1-048]** will require multiple reviews alongside the Scheme design dependant on the results of further archaeological works. A final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the oAMS prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO [REP1-005]**. The final AMS must be approved by the relevant council in consultation with the county archaeologist and Historic England.

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	potentially impact on buried remains, particularly if the covering overburden is shallow. Alternative mitigation measures comprising excavation ahead of development or exclusion from panel coverage may need to be explored.	
8.10	Matter 17 [APP-166] Outline Mitigation Strategy 2: the Council has concerns that sections 7.4 and 7.5, setting out measures for the operational (read to include replacement works) and decommissioning phases, contains too little detail. The Applicant provides no detail as to the measures that would be taken in the event that significant maintenance becomes necessary that could require additional groundworks or/and protection works. Additionally, no provision is provided for Council's archaeological presence on site (even minimal) during potential disturbance at the decommissioning phase. Whilst direct impacts to archaeology at this stage are 'not expected' (Outline Decommissioning Environmental Management Plan [REP1-038]), it would be good practice to have measures in place in the event that they occur.	The Applicant has updated paragraphs 7.4.2, 7.5.2 and 7.5.3 of the **oAMS [REP1-048]** to include details of the measures that would be in place in the event that significant maintenance works become necessary during the operational phase and provision for the Council's archaeological presence on Site, when required, during both the operational and decommissioning phases. A final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the oAMS prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO [REP1-005]**. The final AMS must be approved by the relevant council in consultation with the county archaeologist and Historic England.
	Matters 15 to 17 (LIR): - as identified and assessed: a) **Impact** all Phases; (local to sub-regional scale): concern of arising negative impact(s). b) Caveated as per Matter 14. c) **Mitigation measures:** as stated, both an archaeological trenching strategy and revised Outline Archaeological Mitigation Strategy to be tabled for discussion/ approval/ concluded with the Council/ local planning authority(s); these should be concluded prior to any implementation of works on site. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and a FINAL Archaeological Mitigation Strategy [App-166]: – potential positive impact (caveated regarding the strategy post the decommissioning phase).	The Applicant has already addressed these matters in their response paragraphs 8.8 – 8.10 of BBC's LIR above. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s). However as discussed in relation to Matter 14, the Applicant does not agree that the approach taken by landowners after decommissioning should result in negative effects and further maintains that such conclusions are speculative and beyond the scope of assessment for the scheme.

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8.11	Matter 18 Ladder Settlement (Asset 275): the [APP-167] Outline Heritage Enhancement Strategy is broadly satisfactory. However, the Council has concerns over section 4.4 as it is unclear whether the further intrusive investigation proposed (para4.4.2) is to be undertaken separately or is part of the proposed mitigation excavation in the area of woodland planting for this asset. This requires clarification from the Applicant. **Matter 18 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Caveated as per Matter 14. c) **Mitigation measures:** a revised/ clarified Outline Heritage Enhancement Strategy to be tabled for discussion/ approval/ concluded with the Council/ local planning authority(s); strategy should be concluded prior to any implementation of works on site. d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and the Heritage Enhancement Strategy [App-167]: – potential positive impact (caveated regarding the strategy post the decommissioning phase).	The Applicant welcomes the Council's comments that the **outline Heritage Enhancement Strategy (oHES) [REP1-050]** is broadly satisfactory and acknowledges that there is some confusion over section 4.4 in relation to the Ladder Settlement (Asset 275)**.** The Applicant has updated paragraph 4.4.2 of the **outline Heritage Enhancement Strategy [REP1-050]** to clarify that the proposed intrusive investigation (involving public participation) would be undertaken separate to the mitigation proposed in the area of woodland planting (AAC-B-5b). As stated in paragraph 4.4.2 [**REP1-050**] *'the scope of any such investigation would be discussed and agreed through a written scheme of investigation (WSI) with Bedford Borough Historic Environment Team (BBHET) prior to commencement'.* A final Heritage Enhancement Strategy (HES) must be prepared in substantial accordance with the oHES prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO [REP1-005]**. The final HES must be approved by the relevant council in consultation with the county archaeologist and Historic England. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s). However, as discussed in relation to Matter 14, the Applicant does not agree that the approach taken by landowners after decommissioning would result in negative effects, and further maintains that such conclusions are speculative and beyond the scope of assessment for the Scheme.

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8.12	Matter 19 Archaeology requirement (No. 15): the [APP-016] draft DCO Schedule 2 contains a proposed requirement for archaeology. As written this requirement does not reflect the multiple stages of work that will be required if the DCO is granted. These include further archaeological trial trench evaluation and associated reporting, and an updated scheme wide Archaeological Mitigation Strategy to take account of the results of the additional trenching. Further to this there will then be mitigation fieldwork and post-excavation reporting and publication. Currently as tabled, the Council do not support the draft DCO regarding the Archaeology aspect; this requires discussion at Examination. **Matter 19 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Caveated as per Matter 14. c) **Mitigation measures:** Archaeological Mitigation Strategy scope of works and related DCO subject matters to be revised/ clarified and tabled for discussion/ approval/ concluded with the Council/ local planning authority(s). d) **Contractual:** to be secured through the DCO Agreement [APP-016] [App-017] and the Archaeological Mitigation Strategy [App-166]: – potential positive impact (caveated regarding the strategy post the decommissioning phase). e) The Council will seek a s106 Archaeology Monitoring Fee from the Applicant for the duration of the Construction Phase to monitor the Applicant's commitments.	The mechanism set out in requirement 15 of the **draft DCO [REP1-005]** ensures that the detail in relation to the multiple stages of works are agreed with key stakeholders, specifically the local planning authority in consultation with the county archaeologist as well as Historic England and that works are delivered in an agreed and appropriate manner. The first part of requirement 15 (paragraphs 1, 2 and 3) deal with the archaeological works programme of archaeological investigation and how archaeological written scheme of investigation ("WSI") will be carried out. The second part of this requirement (paragraphs 4 and 5) deal with the archaeological mitigation strategy ("AMS"). Requirement 15(4) provides no phase of the authorised development and no part of the site preparation works for that phase may commence until an AMS for that phase has been submitted and approved by the local planning authority in consultation with the county archaeologist and Historic England. An outline AMS is proposed to be certified with the DCO. Taken together, Requirement 15 provides multiple and structured opportunities for engagement with key stakeholders at each relevant stage, ensuring that the scope and nature of archaeological works are appropriately defined and agreed, and that any impacts on archaeological assets are suitably mitigated. On that basis, the Applicant maintains that Requirement 15, as drafted, provides a clear, robust and enforceable mechanism for securing appropriate archaeological mitigation For the avoidance of doubt, the Applicant does not agree to the inclusion of a section 106 agreement or an Archaeology Monitoring Fee. The Applicant refers to its response to Matter 14, which addresses these points in detail.

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8.13	**Conclusion**: the Council would welcome further engagement with the Applicant in order to address the Council's concerns, in particular those relating to the Outline Mitigation Strategy [APP-166] and the proposed archaeological mitigation measures. The Council is of the opinion that it would be useful to build more flexibility into the proposed mitigation measures in order to allow alternative options should a 'No Dig' solution be unachievable. Further discussion on the wording of proposed DCO Requirement 15 relating to Archaeology would be welcomed.	The Applicant notes this comment and provides responses to these points in the rows above.
9.1	Field boundary hedgerows: the Site's field boundary hedgerows and ditch networks has been identified by the Applicant as having significant biodiversity value. The Council would like to see a) specific address and evaluation of the cumulative value of habitat corridors (i.e. field boundary hedgerows) with the proviso of a minimum width corridor as mentioned elsewhere; and, b) how these are to be retained, mitigated, and enhanced within any Outline CEMP (para8.5.13) and Outline LEMP. Further, the Application will need to address adjacencies of existing and proposed solar farms and how maturing screen landscapes and habitat corridors to their site may impact shadow patterns on these adjacent solar farms; and visa versa (Ref. Scoping Report, 2023). It is suggested that these Scoping matters have been addressed in the DCO submitted material.	The Applicant welcomes that BBC are satisfied that the application documents address these matters. The Applicant recognises that the field boundary hedgerows are important linear habitats which contribute to habitat connectivity across the Site and in the wider landscape. An assessment of impact to hedgerows is provided in **ES Vol 1 Chapter 7 Ecology and Nature Conservation [APP-043]** as well as **ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [APP-056]**. In terms of retention, mitigation and enhancement controls, these matters are secured through both the **oCEMP [REP1-032]** and the **oLEMP [REP1-040]**. The Applicant is satisfied that the offsets provided between solar arrays and any existing and proposed vegetation are sufficient to ensure there will no adverse commercial impact on the efficiency of the Scheme.

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9.2	Matter 20 Hedgerow Regulations (1997) and Inclosure Act (1845): the Applicant does not appear to give consideration to (treed) hedgerows that potentially form an integral part of a field system pre-dating the Inclosure Acts. The same matter arises regarding Ancient Woodlands, veteran and other irreplaceable habitats located within 2km of the entire site boundary including associated buffer zones (Ref. Scoping Report, 2023) (Ref. Planning Inspector's Scoping Opinion ID3.2.4). While the Applicant makes reference to the Hedgerow Regulations [APP-017] there is no mention of the Inclosure Act; further in [APP-016] Interpretation: these is no reference to the Regulations and Act which should be included. In light of various existing hedgerows that may need removal to suit access road visibility splays, this requires both in principle and detailed resolution to address the Regulations. **Matter 20 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s) b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** review of address, mitigation, and protection as required under the Hedgerow Regulations (1997) and Inclosure Act (1845) to evidence that the relevant Management Plans address the (landscape and/or habitat) Regulation and/or Act's protection measures. d) **Contractual:** to be secured through the relevant Management Plans: – potential positive impact (caveated regarding the strategy post the decommissioning phase).	The Inclosure Act 1845 has been largely repealed in its majority by the Commons Act 2006. Both these acts focused on the protection and procedure relating to common land. The Applicant confirms that there is no common land within the order limits and, there is therefore, no need to disapply the Inclosure Act 1845 within the **draft DCO [REP1-005]**. The Applicant notes Schedule 3 of the **draft DCO [REP1-005]** where disapplication of local Inclosure Acts, different from the Inclosure Act 1845 and relating only to local legislation, is sought to the extent these may impact on the construction or operation of the Scheme. The Applicant agrees that mitigation should be secured through the DCO Agreement and relevant Management Plan(s) and that this would be positive.
9.3	Habitat: Applicant's PIER Vol 3 Figures 2-1b to 2-1g 'Work No. 8 – works to create, enhance and maintain green infrastructure': a) The Council suggest that these Figures are indicative in terms of intent regarding landscaping works, but that they remain open to discussion with the Host Authorities;	The Applicant notes BBC's comment that **ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121]** addresses most of the matters raised here. Nonetheless, the Applicant has the following comments for clarity:

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	b) While the Applicant has introduced landscape buffers/ corridors to boundary areas it is unclear if these are of sufficient width to form meaningful screening to the development. As a minimum it is suggested that eight metres widths should be agreed and annotated on the Figures accordingly (It is noted in the body of the reports dimensions are suggested, but Plan annotations would aid clarification); c) The Council express concern that the retained landscape to the various river corridors appear either non-existent, or exceptionally narrow, and that these should be protected, say at a minimum of eight metres from watercourse centerline; d) The Figures do not identify protected woodlands and hedgerows making it difficult to read if these too will be afforded a margin of landscape protection; and, as currently presented, the Council are not supportive of these Figures 2-1b to 2-1g. The Council are supportive of the Illustrative Environmental Masterplan (1of14) subject to the above clarification (Ref. PEIR Report, 2024). It is suggested that the [APP-212] Illustrative Environmental Masterplan has addressed most of the matters raised and that matters outstanding are addressed in this response within other matters.	a) **ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [APP-121]** shows the proposed landscape and visual mitigation for the Scheme. The same plan is included as the Illustrative Landscape Proposals at Appendix A of the **oLEMP [REP1-040]**. The oLEMP is a control document that will be certified as part of the Development Consent Order (DCO). Requirement 4 in Schedule 2 of the **draft DCO [REP1-005]** requires that a final Landscape and Ecological Management Plan (LEMP), in substantial accordance with the oLEMP, is prepared and approved by the relevant councils 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 [REP1-040]**. b) The Applicant notes this comment but has not, generally, introduced annotations on the plans to indicate the width of the applied buffers. The buffers are set out (and secured by) paragraph 3.4.1 of the **oLEMP [REP1-040]**. c) The Applicant notes this comment but suggests it may be a matter of the scale of presentation of the drawings. The figures show a minimum 10m buffer between solar fencelines and the watercourses, which is secured in paragraph 3.4.1 of the **oLEMP [REP1-040]**, which the Applicant notes is greater than the 8m buffer requested by the Council. d) The figures do, illustratively, indicate the location of retained woodland and hedgerows. **ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [APP-056]** provides the location and protection measures for trees, woodland and hedgerows. The Applicant understands this to be a legacy comment which has now been resolved. as per BBC's statement that "*It is suggested that the Illustrative Environmental Masterplan has addressed most of the matters raised and that matters outstanding are addressed in this response within other matters.*"

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9.4	Matter 21 Cable corridor: para3.4.4 '…the construction corridor for the grid connection is expected to be up to 25m wide'. For clarity, this dimension should be denoted on the Illustrative Environmental Masterplan(s) to understand potential harm (width) to the existing landscape along this corridor (Ref. PEIR Report, 2024) (Ref. Planning Inspector's Scoping Opinion ID3.2.17). In [APP-038] para2.4.98 the Applicant indicates that the cable corridor within the Order Limits will be set at 25m but that the assumption on length of hedgerow removal will be limited to 6m. The Council requires assurances that any hedgerow removal will be limited to 6m, albeit that the corridor width may be 25m **Matter 21 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): negative impact b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** set out assurances that any hedgerow removal will be limited to six (6) meters. d) **Contractual:** to be secured through the relevant Management Plan: – potential neutral impact.	As set out at paragraph 2.4.98 in **ES Vol 1 Chapter 2 The Scheme [APP-038]**, the Order Limits along the 400kV grid connection have "*typically been set at 25m wide*". This reflects the maximum width of land within which the alignment may be routed and provides flexibility to make minor diversions should unexpected constraints be encountered. It is also noted that the typical construction working width to lay the cable would be "up to 12m wide", to accommodate the trench, temporary access and material stockpiling. On hedgerows, the Applicant can confirm that the ES assumptions are that any required hedgerow removal would be limited to discrete 6m sections at identified locations (with a total of 84m across the Scheme), as set out at paragraphs 2.5.34 to 2.5.35 of **ES Vol 1 Chapter 2 The Scheme [APP-038]**. This is also reflected in the **draft DCO [REP1-005]**, which specifies the sections of hedgerow to be removed in Schedule 12. It should also be noted that Article 41(5) of the **draft DCO [REP1-005]** requires the prior consent of the relevant highway authority for any removal in order for the authorised development to be implemented in of vegetation within the publicly maintainable highway. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral. However, this is only in so far as it related to the specific matter of hedgerow removal, noting that the Scheme would have the potential to deliver circa 17km of new hedgerow and included provisions that would support and protect other existing hedgerows which is clearly a very significant benefit of the scheme.

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9.5	Matter 22 Visibility splays: Applicant PEIR para7.8.6 and 7.8.21 *'Hedgerow habitats will be almost entirely retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening required to permit Site access at ten locations and totaling 54m with no individual length of removal greater than 6m. Post-construction, seven crossing points, totaling 37m, will be reinstated. Implementation of the landscape design is discussed in relation to operational impacts'*. This matter should be read against the Highway Officer's comments regarding visibility splays at access points; and, concern stated elsewhere regarding the construction of temporary access routes and cable corridor widths across the Site and their effect on existing hedgerows and their related habitats. It is suggested that the harm/ effect could be larger than originally stated. If this is the case, then any mitigation measures need to be re-visited. Consequently, the statements in para7.8.8, para7.8.9 etal 'Minor hedgerow removal' may need review and are currently not supported (Ref. PEIR Report, 2024). There is a general concern that at a detailed level the access points off the public highway into the Site do not show the full extent of existing/ historic hedgerows to be removed to enable the required visibility splay. This would create both habitat harm and open the Site to more external views creating setting harm. This requires discussion at Examination. **Matter 22 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) Mitigation measures: i. It is understood that the final routing of construction traffic on/ across the Public Highways (including the PRoW), and that of temporary haulage routes during the Construction and possibly the Replacement Phase will be concluded as part of	The Applicant identifies 'works to facilitate access' as Work No. 9 and 'visibility splays outside the public highway' as Work No. 9A. **ES Vol 1 Chapter 2 The Scheme [APP-038]** sets out at paragraphs 2.4.162 and 2.4.163 that Work No. 9 extends across the full extent of the public highway required for visibility splays for all existing, proposed and temporary access points, and that it is not currently anticipated that any vegetation will need to be removed to facilitate visibility splays. However, if required, existing verges and vegetation within or adjacent to visibility splays will be managed to maintain visibility. Where visibility splays fall outside the public highway these are marked as Work No. 9A. **ES Vol 1 Chapter 2 The Scheme [APP-038]** sets out there are two such locations (SA16 and SA19), and that at each of these access points there is no existing vegetation within the private land that obstructs views. The hedgerow removals are identified in Table 2-34 of **ES Vol 1 Chapter 2 The Scheme [APP-038]**, which sets out that up to 84 metres of hedgerow would need to be removed to facilitate construction, with 42 metres being reinstated at the end of the construction phase. As set out above, this is reflected in the **draft DCO [REP1-005]**, which specifies the sections of hedgerow to be removed in Schedule 12. It should also be noted that Article 41(5) of the **draft DCO [REP1-005]** requires the prior consent of the relevant highway authority for any removal within the publicly maintainable highway. Accordingly, the DCO does not provide an open-ended ability to remove additional hedgerow length for visibility splay provision beyond that which is scheduled and assessed. The Applicant trusts this gives clarity to BBC and addresses their point that "*minor hedgerow removal*" statements are not supported. The **oCTMP [REP1-032]** explains at paragraph 5.3.3 that where an existing field gate or farm track access has no existing visibility splay, a visibility splay would be provided by coppicing vegetation to below 1 metre. In addition, coppicing or pushing back of hedgerows may be required depending on site specific issues

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	the Examination, it is noted that this should be read in conjunction with the impact that visibility splays may have on existing hedgerows and the need for their removal. As a minimum, all such junctions should be mapped with the visibility splays distances as certified by the Council Highway Officers, including evidencing harm to existing hedgerows. ii. The Council would want to see that the worst-case scenario is tested in terms of maximum length and associated turning-radii and visibility splays of construction vehicles to be used. iii. The Council would want to see a statement in the Construction Traffic Management Plan (CTMP) that restricts the absolute length of construction vehicles as to that which was modelled, and table measures how this is enforced (to ensure that no greater harm is created). iv. It is suggested that this could be resolved within Matter 8. d) **Contractual:** to be secured through the relevant Management Plan: – potential neutral impact.	(in particular at temporary access SA14). However, access locations have been selected so that required visibility is achievable with minimal requirement for hedgerow management (paragraph 5.4.1, **[APP-156]**). The Applicant considers that the extent of hedgerow interaction required to deliver access and visibility is identified and assessed in the ES; that the visibility splay requirements and their land take are illustrated within the **Transport Assessment [APP-101]** annexes; and that the **draft DCO [REP1-005]** provides the legal means to control hedgerow removal. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.
9.6	The additional information that has been incorporated into the assessment since statutory consultation is welcomed, including the 2025 bird survey data and additional rationale for the scoping out of Grafham Water SSSI. Based on the updated information the Council is content that the Scheme is unlikely to result in significant effects on statutory designated sites of nature conservation importance	The Applicant notes this comment and welcomes the Council's agreement.
9.7	Matter 23 County Wildlife Site: the Proposed Development will involve works adjacent to / in proximity to three non-statutory sites, Huntingdon Wood County Wildlife Site (CWS) (designated for its ancient woodland, an irreplaceable resource); High Wood County Wildlife Site (CWS) (also designated for its ancient woodland, an irreplaceable resource, and the support it provides to diverse invertebrate and amphibian populations); and, Kangaroo Meadows CWS (designated for neutral grassland communities); consequently:	The effects of the Scheme on non-statutory designated sites, including the County Wildlife Sites are assessed in **ES Vol 1 Chapter 7 Ecology and Nature Conservation [APP-043]** which concludes that the Scheme would have no residual significant adverse effects on any ecological receptor. Regarding the potential impact on hydrology at Huntingdon Wood CWS, it is first important to note that the Scheme maintains a minimum of 15m from the Huntingdonshire Wood Ancient Woodland, in line with Natural England and

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Matter 23 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** review of matters raised below and that harm as may be identified is mitigated: i. While no direct loss of habitat within these sites is expected, the Council is concerned that there is currently insufficient information to verify the Applicant's conclusion that these sites will not be adversely impacted during construction. ii. Further information is required to assess the potential for hydrological impacts through trenching in close proximity to Huntingdon Wood CWS and potential impacts of the use of an existing culvert for construction access. iii. Regarding High Wood CWS, further information is required to demonstrate that traditional practices (such as coppicing) undertaken to maintain the high wildlife value of the CWS will not be adversely impacted upon during construction. iv. 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. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential neutral impact.	Forestry Commissions standing advice. No impacts to Huntingdon Wood are identified within the **Arboricultural Impact Assessment [APP-056**]. The extent of the Scheme proposed near to Huntingdon Wood (at well over 15m) is limited to the laying of a below ground cable and directional drilling under an existing watercourse that runs to the north of Huntingdon Wood, prior to cable installation and restoration. The works would be limited in their extent (digging of trenches, installation of cable and backfilling of soil) depth (only 1-2m deep), and duration (short term works, undertaken sequentially minimising the extent of work at any one time). They are also only propsoed to one side of the wood (the other three sides would remain unchanged). **ES Vol 1 Chapter 12 (Ground Conditions) [REP1-011],** confirms that available British Geological Survey (BGS) records within 1.5 km of the Order Limits report groundwater levels between 1.7m and 7.6m below ground level (bgl). Given the depth of groundwater in the area and the limited extent and depth of the cable excavation and their offset from the wood, a breach of hydrological connection between the wood and underlying groundwater is highly unlikely. Moreover, even if there were an effect, **ES Vol 1 Chapter 7 (Ecology and Nature Conservation) [APP-043],** clearly confirms that Huntingdon Wood "*is not a habitat type that would be expected to be strongly influenced by hydrological conditions (i.e. it is not a Groundwater Dependent Terrestrial Ecosystem)"* and that *"construction works in the vicinity of Huntingdon Woods CWS … would not be expected to influence the local hydrological regime*" . Given the standoff distances implemented and nature / extent of the works no hydrological impacts are expected to Huntingdon Wood CWS which, in any event, is not susceptible to changes in the hydrological regime. In terms of the High Wood CWS, this is located over 100m beyond the Order Limits, and as such, ongoing woodland management activities would not be affected by the Scheme.

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		Finally, as shown on **ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121]**, no woodland is proposed adjacent to the Kangaroo Meadows CWS, which lies north of Great Staughton Road and west of Little Staughton Road and is shown on **ES Vol 3 Figure 7-2 [APP-145]**. The Applicant is only proposing to retain existing vegetation here. Woodland planting is proposed north-west of the residential property named the Kangaroo (in an area not designated as a CWS) to reinforce existing tree belts. Taking the above into consideration, the Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that any effect on the CWS's would be neutral.
9.8	The Council welcome that the design and assessment have evolved to take account of previous consultation feedback on ecological issues. However, the Council 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; this concern is set out below.	The Applicant notes this comment. However, disagrees that the level of survey work, assessment work and detailed information is insufficient for the Council to draw conclusions. Please refer to the Applicant's response to paragraphs 9.9 – 9.20 below, which provide a more detailed response to the Council's concerns.
9.9	Matter 24 Skylark mitigation: the Council is concerned that without suitable mitigation and compensation provision the Proposed Development 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 para7.8.112 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 [REP1-040] currently provides insufficient detail to demonstrate that the proposed measures will be sufficient.	Appendix C of the **oLEMP [REP1-040]** submitted at Deadline 1 (7th April 2026) presents an outline farmland bird mitigation strategy (oFBMS). It provides information as to how the Scheme, through delivery of the oLEMP, would deliver mitigation and enhancement for the breeding and non-breeding farmland bird assemblage. The oFBMS establishes the core mitigation principles and mechanisms that will be taken forward into the final Landscape and Ecological Management Plan (LEMP), which will be prepared and approved post-consent in accordance with Requirement 4 of the draft DCO.

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	Matter 24 (LIR): - as identified and assessed: a) **Impact** (all Phases including post-Decommissioning Phase; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** i. Applicant to table a comprehensive strategy for the protection of skylark ('red-listed') with specific address of their ground-nesting habitat, in accordance with the requirements of the Wildlife and Countryside Act 1981 (as amended). 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): The Council is concerned that without suitable mitigation and compensation provision the Proposed Development 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 para 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 [REP1-040] currently provides insufficient detail to demonstrate that the proposed measures will be sufficient. ii. Details of proposed habitat losses and gains (overall area and territory numbers); iii. Evidenced identification and protection measures of skylark habitat areas (at c.0.5hectares of habitat provision/ breeding pairs to allow them to continue to use the area for breeding purposes); iv. Measures to be employed to protect ground nesting birds during construction and operational phases; v. Consideration of the phasing of both impacts and proposed mitigation/compensation provision; and,	The Applicant considers that the implementation of the oFBMS would result in an overall enhancement to the favourable conservation status of the breeding and non-breeding farmland bird assemblage within the Order Limits and immediate surrounds. It is acknowledged that ground nesting species of open ground (e.g., skylark) are most likely to be affected by the scheme due to displacement from suitable nesting habitat. Through the provision of high-quality grassland habitat managed to be of value to ground nesting bird species and as provision of foraging habitat, the favourable conservation status of these species can be maintained. In this context, it is important note that the mitigation strategy set out in the oFBMS is comparable to that proposed in connection with both the Fenwick Solar Farm (EN010152) and Springwell Solar Farm (EN010149), which were granted development consent by the Secretary of State (SoS) in February 2026 and April 2026, respectively. The Applicant is therefore confident that their proposals are both acceptable and can deliver the best outcomes for ground nesting / farmland bird species, including skylark. The Applicant notes the Council's request that the Applicant makes a formal commitment to maintaining the bird mitigation strategy beyond the Scheme's 40 year operational period. As stated previously in this document, the land will predominantly be leased for the operational phase of the Scheme and, following decommissioning, will be returned to the landowners in accordance with the relevant commercial agreements. For that reason, the Applicant cannot provide an absolute commitment that all enhancements will be retained in perpetuity once the land has been handed back to landowners. Notwithstanding the above Paragraphs 7.1.4 to 7.1.6, of the **oLEMP [REP1-040]** confirm that grazing pasture, neutral grassland, species-diverse grassland and ecological enhancement features) would remain on site at decommissioning but their future retention would be at the discretion of the landowners.

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	vi. Evidence of 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. vii. A strategy, including landowner (Third-Party) commitment, as to how these skylark areas are to be retained and managed post the Applicant's decommissioning phase when they may be established for over 40-years. viii. These detailed matters are required to assess the appropriateness of the measures proposed, and determine if further off-site compensation is required. ix. The Applicant is referred to the RSPB 'Farming for Wildlife: Skylark Plots' (nd) regarding accepted guidance of size of area to be set aside. d) **Contractual:** to be secured through the DCO Agreement and the relevant Management Plan(s): – potential positive impact (caveated regarding the strategy post the decommissioning phase).	Any such, enhancements would not be removed as a result of the Scheme or by actions of the Applicant following decommissioning. Moreover, if landowners were inclined to remove elements, they would have to consider what is present in those areas at the time and the protections that may be in place to safeguard their loss. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the overall effect of the Scheme on the farmland bird assemblage would be positive.
9.10	Matter 25 Roosting bats and trees: the Council is 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 para7.7.20 of the ES [APP-043] that '*trees present within the Site would be retained and protected during construction*', however: **Matter 25 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** review of matters raised below and that harm as may be identified is mitigated:	The mitigation hierarchy has been followed and has led to the avoidance of impacts to all trees within / adjacent to the Order Limits, as confirmed in Table 2 of the **Arboricultural Impact Assessment [APP-056]**. The ecological assessment has been undertaken in line with relevant guidance, including CIEEM guidelines for EcIA and BS 42020:2013. A key part of BS 42020 is proportionality, with survey efforts needing to be 'proportionate to the degree of risk'. As such, surveys are not necessarily required where there is a low risk of impacts, or where impacts can be confidently predicted. Given that no trees would be affected during any phase of the development this would clearly apply to the scheme and the assessment of roosting bats. Accordingly, no further assessment is deemed necessary.

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	i. The Council is 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 para7.7.20 of the ES [APP-043] that 'trees present within the Site would be retained and protected during construction', however the Council considers that as a minimum the location of Potential Roost Feature (PRF-Individual and PRF-Moderate) trees should be established and mapped in order that the Applicant can evidence within the relevant Management Plan(s) that suitable protection buffers have been incorporated into the Proposed Development for the protection of such trees. ii. The Council consider that the minimum six-meter tree and hedgerow buffer outlined in the Applicant's Environmental Statement would be insufficient to prevent disturbance where roosts are confirmed or have the potential to be present. iii. The Council notes that guidance for PRF-M (High potential) trees usually mandates a minimum buffer of 10 to 15 metres from the trunk in residential or development settings, though often this is increased to a 15–30m zone or full avoidance (retention) of the tree, depending on the severity of the construction work. d) **Contractual:** to be secured through the Management Plan(s): – potential positive impact.	Regarding the offsets to trees, this would ultimately need to be agreed in the final CEMP. However, the **oCEMP [REP1-32]** includes reasonable Avoidance Measures Method Statements which would need to be agreed with the Host Authorities prior to works commencing. If further agreement of off sets is required, it can be done at that time. The Applicant is satisfied that appropriate protections and a framework to further those measures in in place for the scheme and that a positive impact can be achieved on this 'matter'.
9.11	Matter 26 Hazel dormouse: the Council note that while the presence of hazel dormouse is unlikely, in the absence of a survey it is not possible to fully rule out its presence. The small scale of potential hedgerow impacts is acknowledged; however: **Matter 26 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s).	The Applicant's assessment is that hazel dormouse are highly unlikely to be present on the Site for the reasons set out in **ES Vol 1 Chapter 7 [APP-043]** and, specifically, the absence of recent records and sub-optimal habitats. Even if they were present, construction impacts on potential habitat (hedgerow in particular) would be very small scale and localised, comprising works at 14 locations and totalling the loss of 84m of hedgerow with no individual length of removal greater than 6m.

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	b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: i. The Council note that while the presence of hazel dormouse is unlikely, in the absence of a 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). ii. Further clarification is required on how this will be monitored and enforced, and by whom. iii. Further clarification is required on how harm/damage that may arise is remedied to the satisfaction of the Council to the Applicant's cost. d) **Contractual:** to be secured through the Management Plan(s): – potential neutral impact.	Moreover, reasonable avoidance measures Method Statements have been included within the **oCEMP [REP1-032]**which would ensure mitigation if hazel dormice (or other species) are present. Taking the above into consideration, the Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that any overall effect on the farmland bird assemblage would be neutral.
9.12	Matter 27 Water vole and otter: 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 Council 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. However, the Council is content that the proposed pre-construction checks detailed in Section 5 of the oLEMP [REP1-040] alongside the commitment to positive management of retained ditches provided in para6.4.8 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:	The Applicant welcomes the fact that the Council is content that pre-construction checks and positive management of ditches would be sufficient to mitigate impacts on water vole / otter. As stated within **ES Vol 2 Appendix 7-6 Otter and Water Vole Survey Report [APP-096]** permanent and temporary watercourse crossings would be no wider than 4m, and as such, culverting would be localised and less than 15m in any given location, meeting the Water Vole Mitigation Handbook definition of 'very small-scale works'. In such circumstances, the Handbook states that surveys up to 100m up and downstream of the impact site are appropriate to confirm the presence or likely absence of water voles. That is therefore the extent of the surveys carried out in connection with the Scheme. As stated in section 2.3.2 of **[APP-096]**, surveys were undertaken by surveying the ditch from the toe of the bank ,with spot checks only undertaken where

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	Matter 27 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: i. The Council 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. ii. Further clarification is required on enhancement proposals including proposals for baseline surveys of areas identified for enhancement to check their existing water vole and otter status to ensure that harm as may be identified is mitigated and that appropriate measures are put in place. iii. Further clarification is required on how this will be monitored and enforced, and by whom. iv. Further clarification is required on how harm/damage that may arise is remedied to the satisfaction of the Council to the Applicant's cost. d) **Contractual:** to be secured through the Management Plan(s): – potential neutral impact.	access was limited. All surveys (full inspection or spot checks) are considered sufficient to identify the presence or likely absence of water vole / otter. Having carried out those surveys the Applicant found no conclusive evidence of water vole. Notwithstanding this, the Applicant has elected to follow a precautionary approach regarding the presence of water vole and general mitigation measures and Reasonable Avoidance Measures (RAMs) have been included within the **oCEMP [REP1-032],** including pre-construction surveys for works within 10m of a watercourse. Noting that water vole burrows are typically located within 3-5m of the toe of a bank. Accordingly, it is not considered appropriate (in the context of the assessment or prevailing guidance) or proportionate to survey for presence of water vole / otter at all retained ditches to be enhanced. If present Water Vole would benefit from the enhancements proposed in connection with the Scheme, which would also provide opportunities for the species to move into these areas, if not already present. Based upon the facts presented above, the Applicant does not consider the scheme would result in an impact on water vole or that further detailed survey work is required to determine whether it would result in a significant impact. The Applicant agrees that this matter can be dealt with by management plans and that it should be considered to have a neutral impact.
9.13	Matter 28 Great crested newt: it is noted that the 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. **Matter 28 (LIR):** - as identified and assessed:	When carrying out the GCN surveys, it was not possible for the Applicant to gain access to third party land outside the site and, as such, it was not possible to survey all ponds within 500m of the Order Limits. Where it was not possible to survey these ponds, a precautionary approach was adopted to the GCN Assessment, which assumed that GCN were present in all ponds that could not be surveyed.

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	a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. Confirmation is required what if any survey has been undertaken at location P46. ii. The Applicant acknowledges that a Natural England license will be required to cover the proposed works, however currently no letter of impediment has been obtained from Natural England. iii. Further clarification is required on how this will be monitored and enforced, and by whom. iv. Further clarification is required on how harm/damage that may arise is remedied to the satisfaction of the Council to the Applicant's cost. d) **Contractual:** to be secured through DCO Agreement requiring a Natural England license: – potential neutral impact. e)	In February 2026 the Applicant submitted a draft GCN licence application to Natural England to gain a 'letter of no impediment' (LONI). The application was made as a direct response to the Written Representation Natural England submitted at examination Deadline 1 **[REP1-081].** Natural England has subsequently provided a formal written response on the 24th April 2026 confirming that they have no impediment to issuing a GCN license later in the process. The letter confirms acceptance oof the Applicant's approach and forms part of their Deadline 2 submission. It should be noted that in addition to the precautionary approach taken to the assessment, the Applicant is also proposing reasonable avoidance measures within the **oCEMP [REP1-032]** to safeguard amphibians during the construction process. Thus, for the reasons stated, the Applicant does not consider that further survey work is required to confirm presence / absence of GCN and agrees that there would be a neutral impact in this regard.
9.14	Matter 29 Cross reference on commitments: the Council 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, management plans, DCO commitments, etc.) and therefore, delivery cannot be assumed; by example: **Matter 29 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** i. Lighting: references to incorporation of sensitive lighting design need to be better reflected in the content of the oLEMP	The **oCEMP [REP1-032]** includes several sensitive lighting measures, to avoid impacts to both human and ecological receptors. These are discussed in Section 4.1.30 to 4.1.33, Table 5.1 and Table 5.2 of the oCEMP, and Section 5.2 of the **oLEMP [REP1-040]**. The Applicant considers these measures adequately control lighting, with further detail to be provided in the final versions of those documents. Regarding the Councils comments on BNG, the **oLEMP [REP1-040]** also covers management of habitats throughout the lifetime of the Scheme, which is expected to be 40 years. BNG requires significant on-site gains to be secured for 30 years, and as such, the Scheme goes above and beyond minimum requirements. Thus, the minimum time-period required for biodiversity net gain has been met and the calculation outputs are considered valid.

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	and CEMP to ensure adverse effects on adjoining habitats such as Huntingdon Wood CWS, High Wood CWS, and other ancient woodland are avoided. [APP-031] Planning Statement para4.7.19 (cross-referenced with [APP-038], para2.5.24 - 2.5.27 and [APP-155] para4.1.26 – 4.1.29): the Applicant's approach that appropriate artificial lighting will be controlled / managed (in part) to ensure that impacts on ecological receptors, nearby residents and amenity users of the Site are minimised is welcomed. ii. The Applicant's attention is drawn to NPS EN-3 (para2.10.46 to 2.10.48) which states that lighting relating to security measures should be fully assessed by the Applicant. iii. It is recommended that the submission of and approval of specific lighting measures form a requirement within the DCO's Schedule of Requirements and Management Plans. iv. Commitments Register (BNG): the Council welcome the inclusion of the expected biodiversity net gain metric outputs as commitment C12 of the Commitments Register [APP-154]. However, the Council are concerned that these commitments are not currently reflected in the oLEMP, and currently the calculation undertaken is high-level only. The Council request that commitments are clearly stated in the oLEMP to ensure clarity on targets post construction. v. The Council 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 Proposed Development, and that ongoing management of created habitats after demobilisation are not currently secured, the Council consider the current BNG calculation outputs (and linked beneficial effects) may therefore overstate the likely final Proposed Development outcome.	Biodiversity net gain objectives, including the habitat type, overall condition and condition criteria targeted are outlined in Table 1 of the **oLEMP [REP1-040]**. Based on the foregoing the Applicant agrees that these matters can be addressed by management plan and that they would result in a neutral impact for lighting, but beneficial in terms of BNG.

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	vi. It is suggested that this needs comprehensive review, including which and how these commitments are then secured in the DCO Agreement. d) **Contractual:** to be secured through DCO Agreement [APP-016] and through the Management Plan(s): – potential neutral impact.	
9.15	Matter 30 Planting selection: the proposed woodland planting and that plants of local provenance are to be utilised is welcomed; however: **Matter 30 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): potential positive impact(s). b) Neither negative nor neutral impacts are identified. **c) Mitigation measures:** i. The Council requests that the final woodland, hedgerow, and river course planting stock list (species list) should be discussed with the local planning authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. ii. Opportunities should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease). iii. Further, an understory of grasses, wildflower meadows, and bulb species add to habitat diversity and ecological resistance would be encouraged. d) **Contractual:** to be secured through planting species list and the relevant Management Plan(s): – potential positive impact.	The Applicant welcomes the Council's support for the principle of woodland planting and the use of locally sourced planting stock. The **oLEMP [REP1-040]** provides the framework for the detailed planting specification to be finalised post-consent, including woodland, hedgerow and grassland seed mixes. The Council's request to incorporate locally important species is noted. The indicative planting specifications in the **oLEMP [REP1-040]** 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. As secured by Requirement 4 of the **draft DCO [REP1-005]**, 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. It is agreed with the Authority that this would lead to a positive impact.

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9.16	Matter 31 Decommissioned planting: it is the Council' understanding that the Provisions requested under the DCO will not seek to remove any of the habitats created or established by the Proposed Development on the Site; however: **Matter 31 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. 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). The exact extent of the landscape screening, hedgerows, and habitat areas as created by the Proposed Development that will be retained in perpetuity is ambiguous and needs clarity to establish the planning benefit(s) of the Application. ii. The Council seeks agreement from the Applicant that areas of species-diverse grassland to be created under the Proposed Development (read in conjunction with skylark ground nesting areas) will be retained and their long-term management secured to ensure the beneficial effects identified in the ES are permanent. iii. The Applicant has not addressed the absolute harm that the potential removal of the Applicant's instated landscapes and habitats post-decommissioning phase could do to the now maturing landscape and habitats. This requires some strategy by the Applicant and commitment by the landowners. d) **Contractual:** to be secured through the DCO Agreement [APP-0161] with reference to land agreements to be concluded	The Applicant can confirm that the Council's understanding of the landowner position is correct, as set out in the Applicant's response to BBC LIR Paragraph 6.14 (Matter 11). The Planning Statement [**APP-031**] makes clear that these benefits are assessed as being delivered for the duration of the Scheme's operational lifespan. In particular, it records at paragraph 8.3.34 that the operational ecology benefits "would be realised for the duration of the Scheme's operational lifespan (40 years)". The planning balance presented by the Applicant is therefore not contingent on permanent retention beyond decommissioning. Once the Scheme is decommissioned and removed, the Scheme-related effects which the mitigation and enhancements are designed to address will no longer arise; the planning weight therefore reflects the fact that both the harms and the associated mitigation and enhancement framework are tied to the operational lifetime, and that it would not be the actions of the Applicant or the Scheme to remove such enhancements following decommissioning. The Applicant does not agree that a negative effect would result if landscaping is removed following decommissioning, such a conclusion would be speculative and beyond the scope of assessment for this scheme.

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	between the Applicant and Third-Parties/ Landowners; to be concluded as part of the Examination: – potential positive impact (caveated regarding the strategy post the decommissioning phase).	
9.17	Matter 32 Landscape widths: the Council note that the minimum six-meter buffer between the fenceline of the solar farm and the surround hedgerows specified in [REP1-040] oLEMP Section 3.4.1 is viewed as insufficient, in particular with regards to hedgerows containing mature trees. The Council would wish to see 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 wider buffer zones that will protect and enhance their value for a range of species. **Matter 32 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** i. The Council would want a minimum buffer zone of ten meters to enable habitat creation/ establishment; enable the protection of the RPZ to maturing trees; ensure screening to listed assets; and, enable a maturing of the existing and instated landscape over the 40-year Proposed Development' period without the need to prune/ cut-back this landscape should it create a shadow impact on the PV panel. ii. It is suggested that this could be resolved within Matter 6. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential positive impact.	The Applicant notes that the 6m buffer which is secured by the **oLEMP [REP1-040]** 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.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
9.18	Matter 33 Grassland establishment: the Council 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 [REP1-040]. 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. **Matter 33 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: i. The Applicant has set-out an approach (methodology and programme) as to how agricultural land, high in nutrient levels and possibly contaminant, is to be made suitable (converted) to species diverse grassland. This should address grass-land establishment, address of failure to establish, and what would be viewed as 'acceptable cover' by the local planning authority. It is noted that this may require the instruction of an Agronomist or similar. ii. Further clarification is required on how this will be monitored and enforced, and by whom. iii. Further clarification is required on how temporary damage (say due to haul routes) that may arise is remedied to the satisfaction of the Council to the Applicant's cost. d) The Council seeks agreement from the Applicant that areas of species-diverse grassland to be created under the Proposed Development will be retained and their long-term management	The Applicant acknowledges the Council's concern that establishment of species-diverse grassland on land in arable use can be constrained by high soil nutrients. However, the Applicant's position is that the approach set out in the **oLEMP [REP1-040]** provides a recognised approach for creating and maintaining species diverse grasslands on productive land, without introducing unnecessary soil disturbance. The example of more intrusive fertility-reduction methods (e.g. soil inversion) are not proposed because they introduce greater soil disturbance and would need to be considered carefully alongside wider soil protection and site constraints. The Applicant has instead amended the **oLEMP [REP1-040]** at paragraph 5.3.35 to clarify that seed mixes will be dependent on soil sampling to determine the most appropriate establishment method on a parcel-by-parcel basis, and at paragraph 5.3.40 to confirm that Yellow Rattle will explicitly be used as a means to promote sward diversity. The **oLEMP [REP1-040]** adopts a monitoring and adaptive management approach, with regular reviews over the establishment period and subsequently to assess the success of grassland establishment, and to identify remedial measures if required. Potential measures are set out in Section 8.3 of the oLEMP. The general approach set out in the **oLEMP [REP1-040]** is that grasslands will be managed so that no cutting is undertaken between March and August inclusive (paragraph 6.5.51), with any winter regrowth cut no later than February (paragraph 6.5.52), thus avoiding conflict with the bird nesting season unless otherwise agreed with an ecological clerk of works. The Applicant agrees that these mitigation measures can be secured through the relevant Management Plan(s) and that they can have a positive impact

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	secured to ensure the beneficial effects identified in the ES are permanent. e) **Contractual:** to be secured through the relevant Management Plan(s): – potential positive impact (caveated regarding the strategy post the decommissioning phase).	
9.19	Matter 34 Veteran trees: the embedded mitigation measures for veteran trees and trees with veteran features outlines in the oCEMP [APP-155] are welcomed. The Council request that for consistency, reference to these measures is also referenced within the oLEMP [REP1-040]. **Matter 34 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): positive impact(s). b) Neither negative nor neutral impacts are identified. c) **Mitigation measures**: as stated above, to provide clarity of intent across the numerous Management Plans. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential positive impact (caveated regarding the strategy post the decommissioning phase).	The Applicant notes that the **oLEMP [REP1-040]** already includes equivalent commitments for the protection of trees and vegetation (inclusive of veteran trees) during the construction phase at paragraph 5.2.7 and therefore has not amended the oLEMP in this regard. In addition, the Applicant notes that the **outline CEMP [REP1-032]** and the **outline LEMP (oLEMP) [REP1-040]** form part of the Application documents and that as secured by the relevant requirements of the **draft DCO [REP1-005]**, no phase of the authorised development may commence until a detailed LEMP and detailed CEMP, which are in substantial accordance with the oLEMP and oCEMP respectively, have been submitted to and approved by the relevant local planning authority. The Applicant agrees that these mitigation measures can be secured through the relevant Management Plan(s) and that they can have a positive impact. However, for the reasons stated above the Applicant does not consider that a positive impact should be contingent on the landscaping remaining beyond decommissioning as that is beyond what is reasonable to assess for the scheme.
9.20	Matter 35 Monitoring strategy: the frequency of monitoring set out within Section 8.0 of the oLEMP is welcomed, but the Council note that the existing monitoring proposals appear largely aimed at assessing progress towards the Biodiversity Net Gain (BNG) targets; in so far: **Matter 35 (LIR):** - as identified and assessed:	The Applicant's outline management plan framework commits to monitoring and reporting to demonstrate compliance and to ensure corrective action is taken where necessary, and to logging, reviewing and acting on complaints, with corrective actions recorded. The frequency of monitoring proposed in the **oLEMP [REP1-040]** is set out in Section 8.1. The Applicant satisfied that the proposed monitoring regime would be acceptable. Notwithstanding this, the Applicant notes that, as provided by

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	a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. 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. ii. The Management Plans should set out frequency on monitoring of all habitat elements for the duration of the Proposed Development, and include an approach to care of the established habitats created post the Decommissioning Phase (recognising that the land will revert back to the landowners). iii. Adherence to the standard approach to monitoring biodiversity promoted in Solar Energy UK guidance is strongly recommended. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term positive impact (caveated regarding the strategy post the decommissioning phase). e) The Council will seek a s106 Landscape Monitoring Fee from the Applicant for the duration of the Proposed Development to monitor the Applicant's management, maintenance, and delivery of the landscape and habitat commitments as made by the Applicant. f) The Applicant should cross-reference this with LIR Matters 24 to 34.	Requirement 4 of the **draft DCO [REP1-005]**, no phase of the authorised development may commence until a detailed Landscape and LEMP and detailed CEMP, which are in substantial accordance with the oLEMP and oCEMP respectively, have been submitted to and approved by the relevant local planning authority
9.21	**Stage 3: Ecology and Nature Conservation LIR Summary** It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities to act as an	This is noted by the Applicant.

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	External Consultant on behalf of the three Host Authorities to assess this aspect and related matters.	
9.22	The ecology and nature conservation matters of concern raised are consistent across the three Host Authorities and therefore are not separated out.	This is noted by the Applicant.
9.25	The Construction Phase of the Proposed Development is expected to result in significant negative impacts on ecological features, including habitat loss and disturbance. Permanent habitat loss will occur due to construction activities during the 30-month construction period. These activities will also result in the potential for disturbance of species associated with these species through noise, dust, lighting, and visual intrusion.	This is noted by the Applicant.
9.26	The Proposed Development will involve works adjacent to / in proximity to three non-statutory sites designated as County Wildlife Sites (CWS) namely Huntingdon Wood CWS; High Wood County Wildlife Site and Kangaroo Meadows CWS. There is currently insufficient information to confirm that these sites, will not be subject to hydrological impacts and that access will be maintained to ensure traditional management practices like coppicing are not impacted.	This matter has already been addressed in the Apploicant's in their response to paragraph 9.7 of BBC's LIR above.
9.27	The Council has raised concerns regarding the adequacy of surveys for protected species, including ground-nesting birds, bats, hazel dormouse, water vole, and otter, which could lead to underestimating impacts. Clarifications are required from the Applicant in order to ensure that the assessment is robust and associated mitigation proposals are appropriate.	The Applicant notes this comment. However, they disagree that the level of survey work, assessment and detailed information is insufficient for the purpose of assessing effects. The Apploicant's position in relation to each of the species referenced by the Council is summarised below: ***Ground-nesting birds*** As noted previously, Appendix C of the **oLEMP [REP1-040]** (submitted at Deadline 1) presents an outline farmland bird mitigation strategy (oFBMS). It provides information as to how the Scheme, through delivery of the LEMP in

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		substantial accordance with the oLEMP, would deliver mitigation and enhancement for the breeding and non-breeding farmland bird assemblage. The oFBMS establishes the core mitigation principles and mechanisms that will be taken forward into the final Landscape and Ecological Management Plan (LEMP), which will be prepared and approved post-consent in accordance with Requirement 4 of the **draft DCO [REP1-005].** The Applicant considers that the implementation of the oFBMS would result in an overall enhancement to the favourable conservation status of the breeding and non-breeding farmland bird assemblage within the Order Limits and immediate surrounds. It is acknowledged that ground nesting species of open ground (e.g., skylark) are most likely to be affected by the scheme due to displacement from suitable nesting habitat. Through the provision of high-quality grassland habitat managed to be of value to ground nesting bird species, as well as provision of foraging habitat, the favourable conservation status of these species can be maintained. It is important note that the mitigation strategy set out in the oFBMS is comparable to that proposed in connection with both the Fenwick Solar Farm (EN010152) and Springwell Solar Farm (EN010149), which were granted development consent by the Secretary of State (SoS) in February 2026 and April 2026, respectively. ***Bats*** Please refer to the Applicant's response to paragraph 9.10 of BBCs LIR above. ***Hazel Dormouse***, Please refer to the Applicant's response to paragraph 9.11 of BBCs LIR above

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		Water Vole, and Otter Please refer to the Applicant's response to paragraph 9.12 of BBCs LIR above The Applicant considers that the necessary clarifications and further information has been presented in relation to each of these matters and that the assessments are robust and based upon appropriate and proportionate mitigation measures.
9.28	The Council has emphasized the need for a detailed farmland bird mitigation strategy, sensitive lighting measures, and expanded buffer zones for hedgerows and trees to mitigate potential ecological impacts. These measures need to be secured through the DCO process including incorporation into the Outline Construction Environmental Management Plan (oCEMP), Outline Landscape and Ecology Management Plan (oLEMP), DCO commitments register or other submission documents as appropriate.	With respect to farmland bird mitigation, the **oLEMP [REP1-040]** submitted by the Applicant at Deadline 1, provides additional detail and clarification on the Applicant's approach to farmland bird mitigation, and is provided as Appendix C, 'farmland bird mitigation strategy'. The Strategy the Applicant is advocating for the mitigation of impacts on ground nesting birds (i.e., provision of open grassland) is comparable to that proposed on the Fenwick Solar Farm (EN010152) and Springwell Solar Farm (EN010149), which were granted development consent by the Secretary of State (SoS) in February 2026 and April 2026 respectively. The Applicant considers their approach to be appropriate and proportionate, and it is clearly in line with practice that has been accepted on other Solar DCO projects. On lighting the **oCEMP [REP1-032]** includes several sensitive lighting measures, to avoid impacts on both human and ecological receptors, which are set out in Sections 4.1.30 to 4.1.33, Table 5.1 and Table 5.2. It also provides a framework for the final CEMP. This would include additional detail on construction lighting / mitigation. In addition, the **oLEMP [REP1-040]** also sets out additional mitigation measures with respect to lighting in Section 5.2. The Applicant considers these measures adequately control lighting, with detail to be provided in the final versions of those documents to be submitted to and approved by the relevant local planning authority.

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		The Applicant relies on buffer zones and protection stand-offs as embedded mitigation to avoid and reduce ecological impacts on hedgerows, trees and associated boundary habitats. The main measures are embedded in the **oCEMP [REP1-032]** and comprise: • Minimum 6m buffer to retained boundary habitats (including hedgerows) • Minimum 10m buffer from watercourses • Tree and woodland protection to BS 5837, including construction exclusion zones and tree protective fencing • Minimum 15m ancient woodland stand-off (where present) The ecological assessment has been based upon these minimum requirements and has not identified the need to change them to ensure the avoidance of significant effects. On that basis, the Applicant is satisfied that appropriate and proportionate mitigation is proposed and that, with the measures reflected in the oCEMP [REP1-032] and oLEMP [REP1-040] and carried through into the detailed management plans as secured by Requirements 4 and 5 of the draft DCO [REP1-005] any potential significant effects can be appropriately mitigated.
9.29	During the Operational Phase, the Proposed Development is expected to deliver significant ecological benefits through the creation of diverse habitats, including native woodland, hedgerows, grazed pasture, and species-rich grasslands. However, concerns remain regarding the displacement of ground-nesting birds, such as skylark and lapwing, due to disturbance during operation. Additionally, shading impacts from mitigation woodland planting on Kangaroo Meadows CWS require further clarification.	The Applicant welcomes acknowledgement from the Council of the significant ecological benefits that would be delivered during the operational phase of the Scheme. As set out in the response to paragraph 9.27 of the BBC LIR above, a mitigation strategy relating to disturbance to farmland birds is now attached as Appendix C to the oLEMP. **[REP1-040].** In terms of operational phase disturbance to ground nesting birds, this is unlikely to be as a result of any site management or operations, and it is assumed that the Council is referring to the effect of a substantial replacement phase for the

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		Scheme. As noted previously the Applicant is in the process of preparing a Technical Note that assesses the effects of the Scheme during a substantial replacement phase and this will be submitted for examination at Deadline 3. Finally, there appears to be some confusion regarding the impacts that may occur as a result of mitigation woodland planting on the Kangaroo Meadows CWS. As shown on **ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121**], no woodland is proposed adjacent to Kangaroo Meadows County Wildlife Site, which lies north of Great Staughton Road and west of Little Staughton Road and is shown on **ES Vol 3 Figure 7-2 [APP-145]**, the Applicant is only proposing to retain existing vegetation in this location. The new Woodland planting is located north-west of the residential property / kennels called the Kangaroo, which is not designated a CWS. Accordingly, there should be no impact from the planned woodland planting on the Kangaroo CWS. Based upon the above, it is considered that the operational phase effects of the scheme should be wholly positive with very little negative impact on any habitats or species.
9.30	The Council stresses the need for securing a holistic biodiversity monitoring plan to complement the Biodiversity Net Gain (BNG) targets. In addition, the Council request that clear commitments are provided to demonstrate how habitat management and maintenance will be secured throughout the 40-year operational, in order to ensure the predicted positive effects during the operational phase are achieved.	Whilst biodiversity net gain is not a mandatory requirement for the Scheme, the Applicant is committed to delivering a high level of biodiversity enhancement at East Park and has amended the oLEMP [REP1-040] to provide a clear and firm commitment to achieving biodiversity net gains. Section 8 of the **oLEMP [REP1-040**] sets out how habitats will be monitored, with Section 8.2 referring specifically to BNG. Paragraph 8.2.4 states that: "*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.*" The Applicant will endeavour at the detailed design stage to meet or even exceed the higher BNG totals assessed in the **BNG Report [REP1-052]** , particularly with regard to watercourse units.

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		Requirement 4 of the **draft DCO [REP1-005]** would secure a final Landscape and Ecological Management Plan in substantial accordance with the **oLEMP [REP1-040]**, that is also the subject of agreement with the council, prior to commencement of any phase of the authorised development.
9.31	The decommissioning phase raises significant concerns regarding the long-term survival and management of habitats created under the Proposed Development. Once the physical infrastructure is removed, these habitats will be returned to landowners, potentially leading to a lack of ongoing management or even removal. The Council emphasizes the necessity of securing commitments for the long-term retention and management of retained habitats to ensure that the ecological benefits identified during the operational phase are preserved and sustained beyond the Proposed Development's lifespan.	Please refer to the Applicant's response to paragraph 9.16 of BBCs LIR above
9.32	**Matter 36 (LIR):** - as identified and assessed: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR) **Impact 1: Construction Phase** a) **Positive:** no positive impacts or associated effects upon features of ecology and nature conservation importance are expected to arise from the construction of the Proposed Development. The Construction Phase will result in the loss of habitats including areas of existing grassland and hedgerows. In addition, the use of construction machinery and other construction activities have the potential to result in disturbance of retained ecological features (including through noise; visual; lighting and dust). **b) Neutral:** **c) Negative:** i. During the Construction Phase the Proposed Development will result in negative effects on ecological features of	Where relevant the Applicant has responded to each of these points in turn, referencing the responses that have already been provided within previous paragraphs of BBC's LIR where necessary. Points 1-5 are noted and welcomed by the Applicant.

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	importance for ecology and nature conservation. This will include habitat loss due to the construction of the solar arrays, associated access roads and excavations associated with underground cable connections. In addition to permanent impacts there will be some temporary negative impacts (and associated effects) during the 30-month construction period including temporary habitat loss (e.g. for compounds and fencing) as well as potential disturbance (lighting, dust noise and visual) of habitats and species. ii. The Proposed Development will result in the removal of a total of 84m of hedgerow (as sated by the Applicant), a Habitat of Principal Importance under the Natural Environment and Rural Communities Act (2006, as amended), with c.42m of this directly reinstated following the completion of construction works. iii. The Proposed Development requires a total of 22 new watercourse crossings and one upgraded watercourse crossing and these will result in small scale habitat loss and or disturbance. **Mitigation 1: Construction Phase** a) As set out in the various Matters identified in this Aspect. The Council would like to understand how the Applicant assesses and address the management and maintenance of the existing mature and a new maturing landscape habitat over the operational lifespan of the project (circa 40-years). This represents a significant financial and staffing commitment which is currently not evidenced (Ref. Scoping Reports, 2023). b) While the Council is in-principle supportive of the Applicant's [REP1-036] outline Operational Environmental Management Plan, [REP1-040] outline Landscape and Ecological Management Plan, and [APP-161] outline Soil Management Plan, these require more detailed resolution, specifically how	The management plans have been prepared at outline stage and provide the framework against which the final, detailed management plans will be prepared and secured in accordance with the relevant DCO Requirements. Those detailed plans will be required to be submitted to, and agreed with, the relevant local planning authority in advance of the relevant phase of development. Further, the ES already provides clear information on the likely staffing profile within the ES and the proposed management regime is set out across the suite of outline management plans submitted with the application. How these matters are to be financed should not be a relevant consideration. The Applicant further maintains that the draft

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	they are to be staffed, financial ring-fenced, and implemented (managed landscapes and habitats) over the 40-year operational phase.	DCO provides the appropriate and sufficient mechanism for securing delivery of those measures.
	c) Further clarification is required on how this will be monitored and enforced, and by whom. d) Further clarification is required on how harm/damage that may arise is remedied to the satisfaction of the Council to the Applicant's cost.	Monitoring and enforcement will be the role of the Council who will need to monitor the operations and ensure that they are being carri8ed out in accordance with the approved details, taking enforcement action where it is deemed necessary. The owner / operator would need to take remedial; action at their own cost in line with any enforcement action the council chooses to take.
	Impact 2: Operational Phase a) **Positive:** the Proposed Development would result in the creation of significant areas of habitat creation including approximately 19ha of native species woodland or woodland belt; 17.4km of native species hedgerow; 375 individual native species trees; 448ha of grazing pasture of neutral grassland and 205hectares of species diverse grassland. The establishment and ongoing maintenance of these habitats during the operational phase is expected to result in a significant positive effect on habitats during the 40-year operational phase. In addition, these habitats have the potential to result in positive effects for breeding birds (except ground nesting species), foraging and commuting bats, amphibians and reptiles	This acknowledgement is welcomed by the Applicant.
	b) Neutral: i. During the operational phase no effects are expected on statutory designated sites for nature conservation or Huntingdon Wood CWS or High Wood County Wildlife Site (CWS) which adjoin the Proposed Development.	This acknowledgement is welcomed by the Applicant.
	ii. During operation the impact (and corresponding effects) on otter and water vole populations utilising watercourses within and adjacent to the Proposed Development are expected to be Neutral.	This acknowledgement is welcomed by the Applicant.
	c) Negative:	

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	i. 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. ii. The presence of an operational array of solar panels is expected to result in ongoing disturbance that will result in displacement of ground nesting bird species including skylark and lapwing. This is expected to result in negative effects on ground nesting birds. The extent to which this impact will be offset by the proposed additional details relating to required farmland mitigation measures highlighted in relation to impacts arising during the construction phase. With implementation of an appropriate mitigation strategy this potential negative effect during operation could be reduced to a level where it is not significant. **Mitigation 2: Operational Phase** a) 40-year landscape management: the Proposed Development is identified within the Environmental Statement as having an 'operational lifespan of up to 40-years'; and (para7.5.29) 'LEMP…landscape mitigation and ecological mitigation…and would also set out how this would be managed by the Applicant over the lifespan of the Proposed Development'. The Council would like to understand how the Applicant assesses and addresses the management and maintenance of the existing mature and a new maturing landscape habitat over the operational lifespan of the Proposed Development (circa 40-years). This represents a significant financial and staffing commitment which is currently not evidenced (Ref. Scoping Reports, 2023). b) While the Council is in-principle supportive of the Applicant's [REP1-036] outline Operational Environmental Management Plan, [REP1-040] outline Landscape and Ecological Management Plan,	This matter has already been addressed in the Applicant in their response to BBC LIR paragraph 9.29 above. This matter has already been addressed by the Applicant in their response to BBC LIR paragraph 9.27 above. The Applicant has provided details of the proposed management and maintenance in Section 8 of the **oLEMP [REP1-040].**

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	and [APP-161] outline Soil Management Plan, these require more detailed resolution, specifically how they are to be staffed and implemented over the 40-year operational phase. **Impact 3: Decommissioning Phase** a) **Positive:** no positive impacts or effects on features of ecology and nature conservation importance are expected during the decommissioning phase. b) **Neutral:** no positive impacts or effects on features of ecology and nature conservation importance are expected during the decommissioning phase. c) Negative: i. The Council is concerned that there is a lack of information on the long-term survival (i.e. beyond 40 years) of the habitats created as mitigation and compensation. It is the Council's understanding that the Provisions requested under the DCO will not seek to remove any of the habitats created or established by the Proposed Development on the Site. However, following decommissioning (i.e. the removal of the physical infrastructure) all habitats would be returned to landowners, and at this ongoing management may cease or they could potentially be removed subject to the relevant legislative and policy requirements at the time being adhered to. ii. The extent to which the long-term retention and ongoing management of these habitats is secured is considered a vital part in substantiating the overall residual effects of the Proposed Development on ecological features reported in the Environmental Statement. **Mitigation 3: Decommissioning Phase** a) As set out in the various Matters identified in this Aspect.	This matter has already been addressed in the Apploicant's in their response to BBC LIR paragraph 6.14 above. For the reasons stated in that response, it is not considered that what happened after decommissioning should be seen as a necessary part of the assessment. As set out in most of the Apploicants responses in this aspect of the LIR, the applicant has prepared and submitted a large number of management plans which will form a key party of mitigating effects of the development whilst also ensuring that the considerable benefits of the Scheme are realised. The Applicant is in full agreement with the council on this point and that the scheme can deliver positive ecological benefits.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Contractual (all Phases): to be secured through the DCO Agreement and relevant Management Plan(s): – potential positive impact (caveated regarding the strategy post the decommissioning phase).	
9.33	Matter 37 Biodiversity Net Gain: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR)	Noted
9.35	The Applicant's assessment indicates that the Proposed Development could deliver biodiversity net gains of approximately 79.51% for area-based habitats, 36.91% for hedgerows and 5.95% for watercourses. The Council welcomes the intention to deliver biodiversity enhancements through habitat creation and improved land management across the Site.	Noted
9.36	However, the Council notes that the BNG assessment currently represents a high-level calculation and that delivery of the predicted biodiversity gains will depend on the successful establishment, management and monitoring of the proposed habitats. In particular, the Council considers that the final biodiversity outcomes will be influenced by the detailed design and implementation of habitat creation measures, including soil preparation and the interaction between proposed habitats and operational infrastructure such as solar arrays.	The Applicant acknowledges that the assessment has been based on an illustrative design, as reflected in the Illustrative Landscape Proposals of the **outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]** with which the Scheme must be developed in substantial accordance with. Accordingly, and adopting a precautionary approach to avoid any future compliance issue, the Applicant has elected to claim and commit to a slightly lower BNG. This approach, as set out in Section 7.8 of the Planning Statement [APP-031], allows appropriate flexibility to be retained at the detailed design stage while remaining confident that the committed level of BNG
	The Council notes that the spatial information presented within the application documents do not clearly show the relationship between proposed habitat creation areas and the full extent of operational infrastructure across the Site. Greater clarity on the spatial arrangement of solar panels, access tracks, and habitat areas would	Section 8 of the **oLEMP [REP1-040]** sets out how habitats will be monitored, with Section 8.2 referring specifically to BNG. Paragraph 8.2.4 of the **oLEMP [REP1-040]** states that "*Details regarding the monitoring criteria and specific methods to be used for each habitat type will be outlined in a Biodiversity Net*

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	assist in understanding how the predicted biodiversity outcomes will be achieved.	*Gain Habitat Monitoring and Management Plan, to be prepared as part of the final LEMP."* The **oLEMP [REP1-040]** covers management of habitats throughout the lifetime of the Scheme, which is 40 years. Biodiversity net gain only requires significant on-site gains to be secured over a 30-year period, and as such the Scheme goes above and beyond the minimum requirements for BNG. Biodiversity net gain objectives, including the habitat type, overall condition and condition criteria targeted are also outlined in Table 1 of the **oLEMP [REP1-040]** Requirement 4 of the draft DCO [REP1-005] prevents any phase of the authorised development from commencing until a detailed Landscape and Ecological Management Plan (LEMP), in substantial accordance with the oLEMP, has been submitted to and approved by the relevant local planning authority. This requirement provides the mechanism through which the detailed prescriptions are secured and rendered enforceable for the operational lifetime of the Scheme. On that basis, the Applicant considers that biodiversity net gain has been addressed in a proportionate and appropriate manner for this stage of the DCO process.
9.37	The Council considers that opportunities may exist to further strengthen the BNG strategy through the enhancement of retained habitats and watercourses where practicable.	
9.38	Finally, the Council notes that the Proposed Development has an operational lifespan of up to 40-years, after which solar infrastructure would be removed and the future land use determined. The long-term retention and management of habitats created as part of the BNG strategy beyond this period is therefore uncertain, meaning the biodiversity benefits delivered during the operational phase may not represent permanent biodiversity gains. BNG has been considered by the Applicant as part of the Environmental Statement, building on matters raised during earlier pre-application and PEIR consultation stages. The submission of a standalone BNG Report [APP-168] represents a progression from previous material and provides a clearer basis on which the Proposed Development's proposed biodiversity outcomes can be examined. However, there are matters of detail or clarification that require resolution; namely:	
	Matter 37 BNG (LIR): - as identified and assessed: **Impact 1: Construction Phase** a) **Positive:** the Council notes that the Proposed Development design incorporates measures intended to minimise impacts on ecological features, including the retention of the majority of existing hedgerows, woodland blocks and watercourses within the Site. The layout of the Proposed Development has, in the majority of cases, sought to avoid direct impacts on these features where practicable.	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	b) **Neutral:** the Council notes that the BNG assessment does not generate biodiversity units during the construction phase, as habitat creation and enhancement measures would be implemented following completion of construction activities. i. Negative: Construction of the Proposed Development will result in the loss or conversion of habitats within the development footprint. While much of the baseline habitat comprises low-distinctiveness agricultural land, the baseline assessment identifies approximately 42.7 ha of medium distinctiveness habitats, including other neutral grassland and areas of scrub, a proportion of which will be lost. ii. The BNG assessment also identifies limited removal of existing hedgerow, amounting to approximately 0.07 km of baseline hedgerow loss across the Site (however, this is subject to on-going discussions regarding visibility splays at access junctions). a) **Mitigation 1: Construction Phase** a) The Council notes that habitat losses are reflected within the BNG assessment and are proposed to be addressed through habitat creation and enhancement measures to be delivered as part of the Proposed Development. However, the Council emphasises that the mitigation hierarchy should continue to be applied through the detailed design and construction phases, ensuring that habitat loss is avoided and minimised wherever practicable before reliance is placed on compensatory habitat creation. b) The Council considers that mitigation during construction should be secured through the final Construction Environmental Management Plan to be approved prior to construction, including appropriate habitat protection measures and ecological supervision where works occur in proximity to retained habitats.	This is noted and would be the Applicant's intention in accordance with the construction phase provisions set out within the **oLEMP [REP1-040]** and **oCEMP [REP1-032**]. This is agreed by the Applicant.

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	c) The Council also notes that opportunities may exist to undertake early habitat creation and planting during construction, where practicable. Early implementation of habitat creation measures could support earlier establishment of habitats and reduce the temporal lag between habitat loss and delivery of biodiversity enhancements. d) The Council notes that the construction programme for the Proposed Development extends over a period of approximately 30 months, with habitat mitigation and landscaping proposed towards the later stages of construction. The BNG assessment does not apply a delay to the time to target condition for created habitats and therefore assumes that habitat creation occurs immediately following habitat loss. However, the construction programme indicates that the establishment of replacement habitats would occur during the later stages of the construction period. The Council requests clarification as to how the timing of habitat creation relative to the construction programme is reflected in the BNG assessment. In principle, this delayed initiation of landscape works is not supported.	The Applicant acknowledges the Councils' suggestion regarding advance planting. Mitigation planting will be undertaken as early as reasonably practicable, taking account of construction phasing and good practice. However, there are practical and environmental constraints which limit the extent to which advance planting can be implemented, including the need to coordinate planting within a 30-month construction programme, the requirement for planting to be undertaken during the appropriate planting season (typically November to March), and the need to source substantial volumes of planting stock. Whilst early planting will be pursued where feasible, it is not possible to commit to widespread advance planting across the Site at this stage. The proposed approach nevertheless ensures that mitigation will establish progressively and deliver the assessed reduction in effects by Year 10, as set out in the LVIA. On the matter of timings within the BNG assessment the Applicant acknowledges that when finalised the metric should be adjusted for any time difference between habitat loss and compensation, using the delay in starting habitat creation or enhancement function to reflect the number of years the habitat is absent between clearance and the start of compensation. At the present time the assessment has not been carried out on that basis. The reason for this is, as set out above regarding the advance planting, the Applicant currently has no certainty over the overall development phasing or phased implementation of landscaping / habitat creation or indeed what will be fully achievable in that regard. That certainty will come nearer to the detailed design phase and following the finalisation of the design and various management plans through the discharge pf requirements. The assessment has been carried out to provide an initial assessment of what could be achieved by the Scheme against the current BNG Metric and to understand what could be achieved on the site. the metric would need to be

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Impact 2: Operational Phase a. **Positive:** i. During operation, the Applicant proposes the creation of habitats including species-rich grassland, woodland planting and native hedgerow creation. The Council recognises that the conversion of intensively managed agricultural land to habitats managed for biodiversity has the potential to deliver ecological benefits if successfully established and maintained. ii. The Applicant's BNG assessment predicts net gains of approximately 79.51% for area-based habitats, 36.91% for hedgerows and 5.95% for watercourses, arising primarily from the conversion of existing arable land to habitats managed for biodiversity. b) **Neutral:** once operational, the Site is expected to experience relatively low levels of activity and will primarily be managed for habitat establishment and ecological enhancement. c) **Negative**: i. Operational infrastructure including solar arrays, fencing and access tracks will occupy areas of the Site and limit the extent of habitat creation in those locations. The Applicant's BNG assessment does not include a post-development	updated and finalised at that state. However, for the reasons set out elsewhere in the Apploicants response to the Host Authorities LIR's it remains the case that • BNG is not a mandatory requirement for NSIP projects, • the scheme will not be bound by the new BNG guidance for NSIP guidance for NSIP development, which will only come into force for schemes submitted after November 2026, • the draft BNG Guidance for NSIPs will differs from that for TCPA applications and when applied to the Scheme leads to much higher outputs than currently presented in the application documentation. The Applicant is satisfied that the information submitted is sufficient to demonstrate that the Scheme is capable of delivering a significant biodiversity net gain. Noted. As noted above a final calculation will be provided once the detailed design is finalised alongside the other management plans. The current calculation makes a reasonable assumption on land lost to infrastructure which is considered by the Applicant to be sufficient for the purposes of assessment at this stage.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Biodiversity Net Gain figure showing the location of operational infrastructure alongside proposed habitat creation areas. As such, it is not clear how the interaction between infrastructure and proposed habitats has been accounted for within the BNG assessment. The Council therefore requests that a post-development BNG figure is provided to clearly show the spatial relationship between solar infrastructure and proposed habitats. ii. The Council notes that the predicted biodiversity net gains are dependent on the successful establishment and long-term management of created habitats, particularly species-rich grassland. Many of the proposed habitat creation areas are currently under arable cultivation and may therefore have elevated nutrient levels, which can present challenges for the establishment of species-rich grassland without appropriate soil preparation measures.	The Applicant acknowledges the Council's concern that establishment of species-diverse grassland on land in arable use can be constrained by high soil nutrients. However, the Applicant's position is that the approach set out in the **oLEMP [REP1-040]** provides a recognised approach for creating and maintaining species diverse grasslands on productive land, without introducing unnecessary soil disturbance. The example of more intrusive fertility-reduction methods (e.g. soil inversion) are not proposed because they introduce greater soil disturbance and would need to be considered carefully alongside wider soil protection and site constraints. The Applicant has the **oLEMP [REP1-040]** to clarify that seed mixes will be dependent on soil sampling to determine the most appropriate establishment method on a parcel-by-parcel basis, and to confirm that Yellow Rattle will explicitly be used as a means to promote sward diversity. The **oLEMP [REP1-040]** adopts a monitoring and adaptive management approach, with regular reviews over the establishment period and subsequently to assess the success of grassland establishment, and to identify remedial measures if required. Potential measures are set out in Section 8.3 of the **oLEMP [REP1-040]**. As stated within Table 3 of the Biodiversity Net Gain Report [APP-168] land within the solar fenceline, including under panels has been classified as modified grassland in moderate condition. This is in line with established convention for solar farms both within Bedfordshire and Huntingdonshire, and also other Nationally Significant Infrastructure Projects. Examples of precedent developments are provided as follows: • Rookery Solar Farm (Huntingdonshire 24/00883/FUL) • Lowfield Farm solar (Bedford Borough 24/00858/MAF) - Provided 'other neutral grassland' under panels • Tilbridge Solar (PINS Ref: EN010142) Provided Modified grassland under panels. • From the three above applications it is evident that there is precedent for creation of modified grassland (or higher) under panels. Modified grassland

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	iii. The Council also notes that modified grassland habitat is proposed within fields containing solar panels, where shading, changes in rainfall distribution and operational management constraints may influence habitat establishment and condition. The BNG assessment currently assumes that these habitats will achieve moderate condition, and the Council request clarification as to how this target condition has been determined and whether it is considered achievable in areas located beneath or adjacent to solar infrastructure. **Mitigation 2: Operational Phase** a) The Council considers that further clarity is required regarding how the predicted biodiversity net gains will be secured and delivered through the Landscape and Ecological Management Plan, including how the management prescriptions within the LEMP link to the proposed biodiversity net gain commitment and demonstrate how the targeted BNG outcomes will be achieved.	within solar areas would be managed through a mowing or grazing regime as appropriate. In this context the applicant is aware the Habitat classification system (2023) states solar panels should be classified as developed land, however while this may be appropriate for habitat mapping, this is not considered applicable to biodiversity net gain. The metric is intended as a proxy for wider biodiversity, based on habitats. It is well established that the land under solar panels will be vegetated and provide biodiversity benefits, and is not comparable to, for example, a hard standing car park. A recent blog post by BSG ecology has clarified this in detail, including support from Natural England. The report states that when clarification was sought from Natural England their response was *"UKHab solar panel habitat type does not apply to the metric, instead users should record the habitat found beneath the solar panels".* Please refer to the Apploicants response to paragraphs 9.36-9.38 of BBC's LIR above, which address these points. Reference should also be made to the Apploicants response to early delivery of landscaping as the same issues on detail and developing the final design alongside the detail of the management plans including the **oLEMP [REP1-040]** to deliver the best possible environmental outcomes would also apply here. . As noted above a final calculation will be provided once the detailed design is finalised alongside the other management plans. The current calculation makes

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	b) In particular, the Council considers that additional details would be beneficial regarding the long-term management, monitoring and resourcing of habitat creation measures, including the frequency and scope of monitoring, over the operational lifespan of the Proposed Development (up to 40 years). This will be necessary to ensure that the biodiversity gains predicted by the BNG assessment are achieved and maintained and that habitat establishment and wider ecological outcomes are effectively monitored. c) The Council notes that the habitat mapping provided within the Outline Landscape and Ecological Management Plan does not show the full extent of operational infrastructure across the Site, with solar panel arrays, access tracks and other infrastructure not presented on the habitat plans beyond the battery storage and substation. While the BNG assessment assumes that a proportion of land will be occupied by infrastructure, the absence of these elements from the habitat figures makes it difficult to understand how proposed habitats will spatially interact with the operational layout of the Proposed Development. The Council considers that the post-development habitat plans should clearly show the location of solar panels, access tracks and associated infrastructure alongside proposed habitat creation and enhancement areas to improve transparency of the assessment. d) The Council also notes that the BNG assessment largely distinguishes between habitats which are retained and those proposed to be newly created. While habitat creation forms an important component of the BNG strategy, the Council considers that opportunities may also exist to enhance existing habitats	a reasonable assumption on land lost to infrastructure which is considered by the Applicant to be sufficient for the purposes of assessment at this stage. The proposals to enhance existing ecological features and habitats are set out within the **oLEMP [REP1-040]** and are then signposted and summarised in **ES Vol1 Chapter 7 (Ecology and Nature Conservation) [APP-43]** and **ES Vol 1 Chapter 2 (The Scheme) [APP-038]** and Work No. 8 of the **draft DCO [REP1-005]**. Work No. 8 of the **draft DCO [REP1-005]** specifically requires the creation, enhancement and maintenance of existing and planned green infrastructure, including native species woodland, hedgerows, individual trees, grasslands and permissive paths. This includes retention of existing woodland, hedgerows, individual trees, ditches and watercourses, and is identified as a core purpose of the Illustrative Environmental Masterplan and the embedded mitigation in. ES Vol 1 Chapter 7 **[APP-43]**, As referenced in the **oLEMP [REP1-040]** and **ES Vol1 Chapter 7 (Ecology and Nature Conservation) [APP-43]** the **Illustrative Environmental Masterplan [APP-121]** includes enhancement of waterside meadows along Pertenhall Brook and an unnamed watercourse through Site B, including riparian woodland blocks, meadows, hedgerows and intermittent riparian tree groups, to deliver ecosystem benefits and habitat connectivity.

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	within the Site, particularly retained hedgerows and other linear features. The Council would welcome consideration of whether such enhancement opportunities could be incorporated within the habitat management strategy to strengthen habitat connectivity and biodiversity outcomes across the Site. e) The Council would also welcome consideration of additional opportunities to enhance watercourse habitats where practicable, including through improvements to channel condition, riparian vegetation and wider habitat connectivity, in order to maximise biodiversity benefits associated with the Proposed Development. **Impact 3: Decommissioning Phase** a) **Positive:** the removal of solar infrastructure at the end of the operational life of the Proposed Development may provide opportunities for restoration of the Site and potential retention or adaptation of habitats established during operation. b) **Neutral:** decommissioning activities will be temporary and undertaken in accordance with the Outline Decommissioning Environmental Management Plan. **a. Negative:** i. Application documents indicate that solar infrastructure will be removed and the land restored following decommissioning, with the future land use determined at that time. The Council notes that habitats created as part of the BNG strategy would therefore revert to landowners once the Proposed Development is decommissioned. ii. The Council is concerned that the long-term retention and management of habitats created to deliver the predicted biodiversity net gains are not currently secured beyond the operational lifetime of the Proposed Development. As a	These matters (i & ii) have already been addressed by the Applicant in their response to paragraph 6.14 of BBC's LIR above. For the reasons stated, it is not considered that what happened after decommissioning should be seen as a relevant consideration of the assessment.

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	result, the biodiversity enhancements identified in the BNG assessment may not represent permanent biodiversity gains. **Mitigation 3: Decommissioning Phase** a) The Council considers that further clarification is required regarding the intended approach to habitat retention and long-term management following decommissioning. In particular, the Council would welcome confirmation as to whether habitats created as part of the BNG strategy could be retained where appropriate, and how the long-term biodiversity benefits associated with the Proposed Development would be secured. **Mitigation measures: General** a) The BNG assessment has been undertaken using the Statutory Biodiversity Metric and is informed by an illustrative design and outline Management Plan proposals. As such, the reported biodiversity gains represent a high-level assessment and are subject to refinement as the Proposed Development design is 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 clarification; i.e. the Council requested a clear differentiation between measures proposed to mitigate the Proposed Development' effects and measures proposed to address BNG requirements/ targets. The Council note that expectations in relation to BNG vary across the Host Authorities' administrative areas affected by the Proposed Development. In particular, Cambridgeshire County Council has articulated	The Applicant acknowledges that the assessment has been based on an illustrative design, as reflected in the Illustrative Landscape Proposals of the oLEMP [REP1-040], with which the Scheme must be developed in substantial accordance with. Accordingly, and adopting a precautionary approach to avoid any future compliance issue, the Applicant has elected to claim and commit to a slightly lower BNG. This approach, as set out in Section 7.8 of the Planning Statement [APP 031], allows appropriate flexibility to be retained at the detailed design stage while remaining confident that the committed level of BNG will be delivered Please refer to the Applicant's response to Paragraph 2.3.4 of BBC's LIR which addresses this matter.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	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 b) Council similarly seek measurable net gains for biodiversity through local plan policy. The Examination should provide the appropriate forum to consider how the Applicant's proposed BNG commitments align with these differing local expectations and emerging national guidance. c) 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. d) The Proposed Development comprises a large-scale ground-mounted solar photovoltaic development - 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 Proposed Development, and the extent to which these areas contribute to the reported biodiversity gains. e) The Council 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 Proposed Development. While it is indicated that further detail will be secured through a Requirement attached to the draft DCO Agreement, absolute clarity will be required by the Council through the Examination	Please refer to the Applicant's response to this earlier in their overall response to Matter 37 of BBC's LIR. Please refer to the Applicant's response to this earlier in their overall response to Matter 37 of BBC's LIR. Please refer to the Applicant's response to this earlier in their overall response to Matter 37 of BBC's LIR. The applicant agrees that a positive outcome can be delivered in relation to biodiversity net gain. However, for the reasons stated previously in relation to this Aspect of the LLIR, it is not agreed that the strategy post the

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	process to ensure that the proposed BNG commitments are capable of being delivered and maintained in practice. **Contractual (all Phases):** a) To be secured through the DCO Agreement and relevant Management Plan(s): – potential positive impact (caveated regarding the strategy post the decommissioning phase). b) The Council will seek a s106 BNG Monitoring Fee from the Applicant for the duration of the Proposed Development to monitor the establishment of the BNG landscapes and habitats commitments as set out by the Applicant. c) Note: 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 Proposed Developments. 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. How this is addressed is for the Examining Authority to determine.	decommissioning phase is a relevant consideration in the assessment. The Applicant would also welcome further discussion with BBC over the cost of monition and how that is secured. Please note the Apploicants comments earlier in this response to Matter 37 of BBC's LIR, which specifically discusses these points.
10.1	Matter 38 Culverts: (Applicant's PEIR) '*the access tracks will be required to cross a number of watercourses and drainage ditches…will be culverted/ crossed'*. It is suggested that this matter is addressed as a detailed design matter and may require consent from the LLFA. The matter could be addressed by way of a pre-commencement condition. It would be a requirement that all culverts are removed at the Decommissioning Phase and the watercourse topography and vegetation reinstated (Ref. PEIR Report, 2024) (Ref. Planning Inspector's Scoping Opinion ID2.1.8). Issues remaining: **Matter 38 (LIR):** - as identified and assessed:	Tables 2-25 and 2-27 within **ES Vol 1 Chapter 2 The Scheme [APP-038]** list, the access track crossings that will be permanent and those that will be temporary. Cable crossings not associated with track crossings, are otherwise secured by horizontal drilling or trenching. Only one new permanent crossing is to utilise a culvert (C52). Instances of use of culverts for track crossings are otherwise only temporary arrangements, therefore the risk of coincidence with extreme storm events is significantly less. As proposed by the Council in their suggested mitigation measures, the Applicant will provide / seek to agree hydraulic calculations post-consent for all planned watercourse structures.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	a) **Impact** (all Phases; local to sub-regional scale): i. **Positive:** if open/clear span structures are proposed, then there will be no reduction in cross-sectional area at the structure which will not increase the risk of flooding. ii. **Neutral:** no impacts identified. iii. **Negative:** if watercourse crossings are not correctly designed and detailed then there is the risk that there will be reduced capacity / cross-sectional area at the structure, which may cause localised flooding or flooding upstream. **b) Mitigation measures:** i. While [APP-038] ES Chp2 The Proposed Development Tables 2.21 set out how watercourses are to be crossed, predominately through proposed open span crossing or use of existing culverts, it is unclear if this approach is only to be adopted during the construction phase, rather than all phases. This requires some clarification. ii. [APP-100] an initial watercourse crossing assessment has been provided; while the content of the initial assessment is acceptable, concern remains regarding the potential use of culverts and associated effect on stormwater flow/ management. It is suggested that the Applicant provide greater clarity and details which could be agreed post-consent to address this matter. iii. The Applicant has suggested that hydraulic calculations for watercourse crossings will be provided during detailed design at post consent – in principle this is acceptable. iv. Approvals from the Local Lead Flood Authority (LLFA) / Internal Drainage Board (IDB) or relevant drainage body will be required for alterations to the affected watercourses. **c) Contractual:** to be secured through the Management Plan(s): – neutral impact.	The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
10.2	DCO Informative 1 Consent: approvals from the Local Lead Flood Authority (LLFA) / Internal Drainage Board (IDB) or relevant drainage body will be required for alterations to the affected watercourse.	The Applicant notes the Council's comment and confirms that any additional consents or licences required for the implementation of the authorised development which are not secured within the **draft DCO [REP1-005]** are set out in the **Other Consents and Licences Statement [APP-033]** providing further clarity on the Applicant's intentions. Unlike planning permissions granted under the Town and Country Planning Act 1990 regime, there is no need to provide informatives within the statutory instrument that is the development consent order. Clarification and justification for the provisions included within the **draft DCO [REP1-005]** are set out in the **Explanatory Memorandum [APP-017]**.
10.3	Stage 3 (Pre-Examination Review) The Council has reviewed the following [APP-044, APP-066, APP-098 to 100, APP-147, APP-165] Environmental Statement - Hydrology and Flood Risk and make the following comments,	Noted.
10.4	Outline Battery Safety Management Plan (oBSMP) [APP-162]: the Council suggests that the outline Plan as submitted addresses matters raised by the Council in their Scoping and PEIR responses. The Plan contains further controls to mitigate for potential impacts arising from the BESS – in an emergency situation where polluted water may run-off from the facility it is proposed that this can be safely contained and treated, rather than risking pollution of groundwater or local watercourses – broadly, these proposals are acceptable.	The Applicant notes and welcomes this comment. It should also be noted that the scope and content of the oBSMP is now a matter of common ground between the Applicant and CFRS (the fire service that would be responsible for attending a fire at the proposed BESS development).
10.5	Matter 39 Infiltration Testing: **Matter 39 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified	The **outline Surface Water Management Plan (oSWMP) [REP1-046]** shows how surface water can be managed for the design storm event, exclusively by the attenuated discharge to surface water. Should low infiltration be confirmed by testing, the current solution is therefore adequate, without the need for additional mitigations.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	c) **Mitigation measures:** it is acceptable that final / further infiltration testing as proposed by the Applicant is to be completed as part of any detailed design resolution, which could be agreed post-consent. It is noted that the assessment assumes that no infiltration is possible – this may be the likely outcome in which case other mitigations measures will need to be reviewed by the Applicant. Applicant to conclude this matter with the local planning authority/ LLFA accordingly. d) **Contractual:** to be secured through the Drainage or similar Management Plan(s): – potential long-term neutral impact.	The Applicant agrees that mitigation should be secured through the DCO A and relevant Management Plan(s) and that the effect would be neutral.
10.6	Matter 40 Catchment runoff rates: **Matter 40 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: [APP-098] it is suggested by the Applicant that the runoff rates/ha provided can be applied to the whole site, or individual parcels of land as required by the calculation(s) – this would be acceptable. It is noted that no cross-catchment flows have been designed/ allowed for which may require evidence for consideration. Applicant to conclude this matter with the local planning authority/ LLFA accordingly. d) **Contractual:** to be secured through the Surface Water and/or relevant Management Plan(s): – potential long-term neutral impact.	No land reprofiling or creation of new drainage networks are proposed as part of the scheme which would change the existing topographical catchments. As such, the Applicant does not consider that cross-catchment flows would need to be considered as part of the assessment. The Applicant is committed to engagement with the relevant host authority and / or LLFA to agree the details of this following the grant of Development Consent and specifically through the discharge of DCO requirements. The Applicant agrees that mitigation should be secured through the DCO Agreement and relevant Management Plan(s) and that the effect would be neutral.
10.7	Matter 41 Solar Panel drainage and potential for erosion from runoff: the maintenance regime of the grassland under the solar panels has been described in detail within [APP-165] outline Surface Water Management Plan and [REP1-040] outline Landscape and Ecological Management Plan – the maintenance regime is acceptable. The support posts for the solar panels take up a surface area that	The combined area of all support posts is a very small proportion of the overall site area. This quantum is hydrologically negligible and should not result in a material increase in runoff volume or peak discharge when compared to the existing greenfield condition.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	becomes impermeable. Individually that area is negligible but collectively with thousands of support posts this area becomes more significant. **Matter 41 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. This impermeable area should be assessed when designing SuDS features such as swales, storage ponds etc. for each area of solar panels. ii. It is suggested that filter drains / swales are provided for every five or six rows of solar panels to help address these impermeable areas at source and to minimise overland flows especially on sloping ground. iii. Applicant to conclude this matter with the local planning authority/ LLFA accordingly. d) **Contractual:** to be secured through the Surface Water and/or relevant Management Plan(s): – potential long-term neutral impact.	The extent of vegetation groundcover is far more influential on runoff rates and there is considerable potential for the Scheme to improve this through an increase in vegetated coverage and the promotion of infiltration. This would more than offset any negligible impacts from the introduction of panel supports, and would be opposed to the landcover currently found across the Site, which will seasonally include significant periods of fallow (bare soil) and furrowed land. The Applicant agrees that mitigation should be secured through the DCO Agreement and relevant Management Plan(s)however the effect of the drainage infrastructure could have an overall beneficial rather than neutral effect.
10.8	Maintenance of SuDS and watercourses: the [APP-165] outline Surface Water Management Plan includes a maintenance plan for all SuDS feature types – this is acceptable.	The Applicant notes this comment.
10.9	Matter 42 Watercourse consenting: the [APP-016] draft DCO suggests granting power to carry out such works, subject to the protective provisions for Bedford Borough Council and Cambridgeshire County Council as the two lead local flood authorities contained within the draft DCO - in principle this approach is found accepted but it is suggested required discussion at Examination.	The Applicant notes and agrees with this comment and how it would be secured through the DCO. Indeed, provision is already made within Part 3 of Schedule 13 of the Draft DCO **draft DCO [REP1-005].** Should it be deemed necessary, the Applicant would welcome further discussion during examination.

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	Matter 42 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified c) **Contractual:** to be secured through the DCO Agreement as Protective Provisions: – neutral impact d)	
10.10	Matter 43 Surface water drainage: detailed drainage plans are to be confirmed at the detailed design stage post-consent – this is acceptable. **Matter 43 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: i. [APP-165] oSWMP sets the principles by which surface water will be managed across the Proposed Development. Discussion is required at Examination as to deliverables, programme, and consenting regimes. ii. Applicant to conclude this matter with the local planning authority/ LLFA accordingly. d) **Contractual:** to be secured through the Surface Water and/or relevant Management Plan(s): – neutral impact.	The Applicant notes this comment and agrees that the **oSWMP [REP-047]** is the appropriate mechanism for its delivery at the detailed design stage. As stated previously the Applicant would question whether the implementation of the surface water mitigation would be neutral.
10.12	In summary, the Council's main concerns are potential use of culverts across water-courses, the managing of overland flow and channelised flow, and what suitable SuDS measures will be installed to the perimeter of each area of solar arrays to mitigate any flood harm to neighbouring properties/ land. While it is considered that most of these matters can be addressed and resolved at technical detailed design stage, potentially post consent, the Council would want these matters raised at Examination.	The Applicant has already responded to these topics in response to Paragraphs 10.5 -10.9 above.

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11.1	Matter 44 Public Highways: the proposed cable route (Illustrative Environmental Masterplan Key Plan, Ref. Figure 2-2a; dated Sept 2024) crosses several public highways and consequently: **Matter 44 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: the Applicant will need to attain the necessary consent, including agreeing to DCO Protective Provisions/ s106/ s278 et al and other financial contributions prior to construction. These should be negotiated with the relevant local planning authorities, specifically noting that this will be a cross-boundary Application (Ref. PEIR Report, 2024). This matter remains relevant and it is suggested that discussions should remain on-going. d) **Contractual**: to be secured through the DCO Agreement, Protective Provisions, and relevant Management Plan(s): – potential long-term neutral impact.	It is the Applicant's position that the **draft DCO [REP1-005]** includes a number of powers that will allow it to carry out works within the public highway, such as Article 10 (Street works), Article 12 (Power to alter layout, etc. of streets) and Article 14 (Access to Works). As these works would be authorised by the DCO it would not be necessary for the Applicant to enter a separate agreement under section 278 of the Highways Act 1980 before carrying out works. In most cases, the proposed works are explicitly authorised by the **draft DCO [REP1-005]**, being shown on the **Street Works, Rights of Way and Access Plan [APP-010]** and described in the relevant Schedule of the draft DCO. These works will be governed by the measures set out in the draft DCO and the relevant management plans, which are considered to provide sufficient protection to the local highway authority without the need for additional protective provisions or separate agreement. In some cases, the Applicant may carry out additional works but only with the consent of the relevant authority. For example, Article 12 (Power to alter layout, etc. of streets) requires consent from the relevant street authority, Article 14 (Access to Works) requires prior approval from the local planning authority. In other instances, this is secured by way of a requirement set out in Schedule 2 of the **draft DCO [REP1-005]**. Requirement 3 (Detailed design approval) provides that for each phase of the authorised development, details of the layout, scale, proposed finished ground levels, fencing, external appearance, and vehicular accesses must be submitted to and approved in writing by the local planning authority before the commencement of that phase. As such, the detailed design of the Scheme will be subject to the approval of the local planning authority.

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		Requirement 5 (Construction environmental management plan) provides that no phase of the authorised development may commence until a construction environmental management plan ("CEMP") for that phase has been submitted to and approved by the local planning authority. The CEMP submitted be in substantial accordance with the **oCEMP [REP-032]** to the extent applicable to that phase. The oCEMP includes details of measures to remedy damage to the highway caused by construction traffic, including pre-construction and post-construction surveys. Requirement 11 (Public rights of way) provides that no phase of the authorised development may commence and no decommissioning may be undertaken, until a public rights of way management plan ("PROWMP") has been submitted and approved by the local planning authority in consultation with the relevant highway authority. The PROWMP submitted must be in substantial accordance with the outline PROWMP **[REP-042]** to the extent applicable to that phase. For this reason, it is the Applicant's position that no additional consents or legal agreements are required upon the DCO being granted to enable the implementation of the Scheme.
11.2	Matter 45 underground infrastructure contamination: It is noted that the Council is not supportive of leaving underground ducting and cables in-situ at the decommissioning phase. The ducting and cables contain plastics and metals which are toxic and with gradual breakdown have the potential to leach into the surrounding ground and groundwater causing contamination. **Matter 45 (LIR):** - as identified and assessed: a) **Impact** negative (all Phases; local to sub-regional scale): long-term, potential significant, impact(s) unless resolved. The Council is **not supportive**. b) Neither positive nor neutral impacts are identified	As set out at paragraph 2.7.1 of **ES Vol 1 Chapter 2 The Scheme [APP-038]**, the Applicant's position is that all cabling will be removed at the end of the decommissioning phase and recycled or disposed of in accordance with good practice and market conditions at the time. Any infrastructure that is more than 1m below ground level, such as the cable conduit and casing, would typically be left in situ to reduce the environmental impact of excavation. Whilst buried cabling and ducting is made of metals and polymers, the idea that it will gradually break down and meaningfully leach 'toxic' substances into soil / groundwater is considered by the Applicant to be overstated. The ducting / conduit used is typically HDPE (or similar polyethylenes) used specifically because it is chemically resistant in soils.

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	i. **Mitigation measures**: The Applicant should be obligated to return the Site, Cable Corridor, and possible servitudes within the Public Highways used by the Proposed Development, free of such known contamination. It is noted that this approach would be supported by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Waste Electrical and Electronic Equipment Regulations 2013 regarding long-term harm (Ref. PEIR Report, 2024). ii. This approach remains the stated Council's position c) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term negative impact if not removed. .	The cabling can be easily removed without significant excavation by 'pulling through' the conduits to extract. The cabling has valuable metals that warrant its removal from the ground and subsequent recycling, with some manufacturers including PVC sheaths that can include additives which over the very long term could cause minor breakdown or leaching. The Applicant therefore considers it appropriate to remove the cabling from the ground. The Applicant notes the requirements of the Waste Electrical and Electronic Equipment Regulations 2013 which are reflected in the **oWMP [APP-164]**. The Applicant also notes the Environment Agency's Relevant Representation, reference EA008 in Table 6 of the oWMP, where the EA do not raise an objection to the Applicant's approach to buried infrastructure at the decommissioning phase, instead noting: "*We accept this is current standard practice, but allowance should be made for removal of all elements of the scheme if that is best practice at the time. While legislation should always be followed, works in addition to this may be required to ensure the best environmental outcomes*." In response to the EA's comments, the Applicant has updated the **oDEMP [REP1-038]** to take into account of contemporary best practice and regulatory guidance at the point of decommissioning, whilst assessing the environmental implications of removing versus retaining sub-surface infrastructure. The Applicant has also updated the **oDEMP [REP1-038]** to clarify that the cable jointing chambers associated with the grid connection will be removed from the ground during the decommissioning phase. In light of the above, the Applicant does not agree with the Council's position on this matter. The Applicant does, however, agree that it is appropriate for the approach to the removal of below ground infrastructure to be secured through the DCO and the relevant Management Plan(s). For the reasons stated they do not agree that these matters would result in a long-term negative impact.

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11.3a	Matter 46 Condition surveys: surveys will be required prior to the construction phase (and potentially the replacement phase), and the decommissioning phase commencing, to assess any related damage to the Public Highway approach roads and an agreement put in place to remediate any damage caused by the Scheme subsequently. Restoration of temporary access points should be subject to a pre-development condition as to be agreed with and authorised by the Council (Ref. PEIR Reports, 2024).	The Applicant notes this comment. A commitment to undertaking pre- and post-construction condition surveys and the restoration of temporary access points has been included within the **oCTMP [REP1-034].** A commitment to the restoration of temporary construction accesses is included within Section 5.3 of the **oCTMP [REP1-034].**
11.3b	APP-011] Traffic Regulation Measures Plan: a temporary weight restriction suspension is proposed on the B645 between the junction with the A1 and the main site access (SA16). The current restriction is '18t Except for Loading'. The proposed suspension is consistent with the HGV routing strategy and is considered reasonable. It is noted that there are no structural weight restrictions on the Public Highways within Bedford Borough Council's jurisdiction in the area of the Proposed Development, all restrictions are environmental (to keep HGVs out of communities). **Matter 46 (LIR):** - as identified and assessed: a) **Impact (**all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**: i. The Council could temporarily remove these environmental weight restrictions to allow access to the Site for the period of construction; however, the above surveys, construction management plan, and agreements would be required. This would need agreement by the various Host Authorities. This is a standard approach adopted by the Council with regards to development. ii. Provision in the DCO for the highway authority to approve the design and standard of construction of any works within the public highway, and rights to carry out inspections and to	The Applicant acknowledges this comment. However, it should be noted that the Relevant Representation from CCC **(**Applicant's reference **CCC-RR-42 [REP1-055]** confirms that they would not support the temporary removal of the weight restriction and have confirmed that it would not be necessary as the current restriction allows for access to a property or development. The proposed temporary lifting of the weight restriction has therefore been removed from the **Traffic Regulations Measures Plan [REP-004]**. No signed weight restrictions – structural or environmental – have been identified along the extent of the highway network within BBC that would be used during the construction phase. For the reasons stated the Applicant considers that this matter has now been addressed.

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	certify that altered highways (including PRoWs) have been constructed to an acceptable standard. iii. The Council is also seeking protective provisions, to discharge their responsibilities to access, inspect, and maintain the public highway within the order limits. d) **Contractual:** to be secured through the DCO Agreement through s278 (Protective Provisions) and relevant Management Plan(s): – potential long-term neutral impact. e) The Council will seek a s106 Highways Monitoring Fee from the Applicant for the duration of the construction vehicle activity on the Public Highways to monitor the Applicant's commitments.	
11.4	**Stage 3: Traffic and Transport LIR Summary** An External Consultant has been appointed under a Memorandum of Understanding with Bedford Borough Council to act in relation to Traffic and Transport and to assess this aspect and related matters. The Host Authorities are working closely together in respect of these matters and as such this representation includes comment relating to Cambridgeshire County Council/Huntingdonshire District Council area for completeness and transparency.	Noted.
11.6/1 1.7	Matter 47 Traffic and Transport – overarching assessment and position The Council is broadly satisfied that an appropriate methodology has been used to assess the impacts of the Proposed Development during the Construction and Operational Phases (this statement does not include the Replacement Phase).	These comments are welcomed by the Applicant. As set out in the Applicant's response to Matters 2 and 3 of the BBC LIR, they recognise that there is some uncertainty amongst stakeholders about how any replacement of panels / batteries during the operational phase would be carried out. Accordingly, the Applicant is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects that may derive from them, and the embedded mitigation measures. The Applicant expects to have the Technical Note ready for examination Deadline 3.

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11.8	The Council is satisfied that the construction period traffic flows presented will not result in a significant adverse impact on the highways managed by the Council, subject to further commitment to matters raised in this Chp.	These comments are welcomed by the Applicant.
11.9	An assessment of the Decommissioning Phase impacts was scoped out on the basis that the number of vehicle movements required during this phase is not known at this stage, but it was noted by the Applicant that it would likely be similar to or less than the Construction Phase. Assuming that the Decommissioning Phase would generate a similar level of vehicle activity as the Construction Phase, the negative impacts are also likely to be similar to those identified for the Construction Phase, and therefore requirements in terms of management of traffic impacts in the [REP1-038] outline Decommissioning Environmental Management Plan (oDEMP) should be similar to those for the [APP-156] outline Construction Traffic Management Plan (oCTMP).	Noted.
11.10	Further, the Council seeks confirmation and a method statement by way of the [APP-156] oCTMP to ensure that the level of traffic generated by the Proposed Development does not exceed that used in the assessment of impacts and recourse measures should this occur.	The Applicant notes this comment. The updated **oCTMP [REP1-034]** submitted at Deadline 1 includes a framework for how the deliveries to the Site would be managed in order to ensure that the level of traffic generated by the Scheme would not exceed the forecast maximum trip generation used in the assessment of impacts. However, the Applicant will continue to consult with BBC in relation to any additional clarity or commitment that may be considered necessary in this regard.
11.11	It is considered by the Council that there is insufficient clarity regarding the management of traffic during the period when wide-scale replacement of the solar panels will be required. In order that the impacts of the Proposed Development can be managed during this phase of the development, the Applicant should be requested to provide further detail of the potential impacts during replacement of	Please refer to the Applicant's response to Matters 2 and 3 of BBC's Local Impact Report.

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	solar panels and should provide an outline Replacement Phase Traffic Management Plan accordingly.	
11.12	There are a number of issues that need to be addressed by the Applicant to provide assurance that construction of the Proposed Development will not result in any unacceptable safety or network operation impacts.	Noted – please refer to the Applicant's response to Matter 47 of BBCs LIR below.
11.13	The Council is satisfied that there will not be any significant impacts on the Council's highways resultant from the cumulative traffic associated with other committed developments.	These comments are welcomed by the Applicant.
11.14	In the Council's Relevant Representation, it was stated that junction capacity assessment was required. Following further ongoing review and liaison with CCC, the Council is satisfied that there is no requirement for capacity assessment of highway capacity on roads managed by the Council. **Matter 47 (LIR):** - as identified and assessed: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR) **Impact 1: Construction Phase** a) **Positive:** no positive traffic and transport impacts arising from this phase have been identified. b) **Neutral:** no neutral traffic and transport impacts arising from this phase have been identified. **c) Negative:** i. The construction phase of the Proposed Development will generate additional vehicle movements, including cars, vans, HGVs and Indivisible Abnormal Loads (AILs), which will have	These comments are noted and welcomed by the Applicant. The Applicant has already addressed the issues / clarifications sought by the Council either within either this response to the Council's LIR or their previous response to the Council's Relevant Representation submission [REP1-055]. The Applicant is satisfied that the measures set out within the relevant management plans (inc the **oCEMP [REP-032], oCTMP [REP-0034) oOEMP [REP-036] oDEMP [REP-038]** and **Traffic Regulation Measures Plan [REP-004]** (and the additional clarification that is to be provided by the Technical Note on replacement works in Deadline 3) provide the necessary framework for the management of traffic related effects at all phases of the Scheme's development. In terms of the request for a s.106 agreement and Monitoring Fee from the Applicant, this is not agreed, please refer to the Applicant's response to Matter 14 which addresses these matters in detail.

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	a negative impact on the local highway network. The applicant has assessed the impact of the construction phase traffic using the Institute of Environmental Management and Assessment (IEMA) (now the Institute of Sustainability and Environmental Professionals (ISEP)) '*Guidelines for the Environmental Assessment of Traffic and* Movement' (July 2023), using the following criteria: Severance; Driver and pedestrian delay; Pedestrian and cyclist amenity, including fear and intimidation; Accidents and safety; and Hazardous loads. ii. The assessment concludes that the effects on drivers, pedestrians, cyclists and public transport users during the Construction Phase would range from negligible to minor adverse, and therefore no effects would be significant. iii. Whilst the Council as highway authority is broadly satisfied that an appropriate methodology has been used to assess the Construction Phase impacts, there are several issues that need to be addressed by the Applicant to provide assurance that construction of the Proposed Development will not result in any unacceptable safety or network operation impacts. These issues were set out in our Relevant Representations. iv. Vehicle tracking for each of the proposed site accesses is also included in the included in DCO submission (Annex C of the Transport Assessment). However, in many locations the vehicle tracking runs outside the proposed access and therefore does not provide evidence that the access points are safe and feasible. The Applicant is requested to resubmit with further detail showing fully dimensioned plans of each access along with tracking showing two-way (simultaneous) movements of the largest vehicles which will use them. The visibility splay drawings should also be updated where necessary to be consistent with any changes to the access	

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	positions, and any management required for safe access/egress (e.g. banksmen/marshals/traffic signals) should be identified. **Mitigation 1: Construction Phase** a) The proposed cable route crosses several public highways and consequently the Applicant will need to obtain the necessary technical approvals, with a mechanism for this included within the DCO Agreement. b) The Applicant has submitted an [APP-156] outline Construction Traffic Management Plan (oCTMP) as part of the DCO submission, setting out measures to be implemented to manage the impact of construction traffic and procedures for monitoring, review, enforcement and corrective measures in the event of any breaches of the oCTMP. The oCTMP should be updated to include monitoring of staff traffic and vehicle occupancy with a clear commitment to implement the proposed minibus services if vehicle occupancy is below that assumed for the assessment. c) The monitoring strategy should include provisions to monitor on an ongoing basis, and make provision for additional minibus services or other measures implemented to ensure that the overall staff traffic generation does not exceed that assumed for the assessment of the Proposed Development's impacts. d) The oCTMP includes an outline Construction Workers Travel Plan. This will require considerably greater detail and intent to address the requirements of policy to enable modal shift and reduce the Proposed Development's carbon footprint. No Travel Plan Monitoring Fee for the construction activity (across all phases) is suggested, and this should be included within the detailed CTMP secured through the DCO Agreement. e) Condition surveys will be required prior to the Construction, Replacement, and Decommissioning Phase, to assess any related damage to the public highway and an agreement put in	

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	place to remediate any damage caused by the Proposed Development subsequently. These and the restoration of temporary access points should be included within the detailed CTMP secured through the DCO Agreement. **Impact 2: Operational Phase** a) **Positive:** no positive traffic and transport impacts arising from this phase have been identified. b) **Neutral:** it is anticipated that there will be up to a maximum of 20 staff on site at any one time, primarily undertaking maintenance tasks and travelling by vans or four-wheel drive vehicles. Access by HGVs are assumed to be minimum. The low level of traffic associated with this phase is considered to have a neutral impact on traffic and transport (this statement does not include the Replacement Phase). c) **Negative:** it is anticipated that that the impact and harm will be no more than that identified in the Construction Phase. **Mitigation 2: Operational Phase** a) The Applicant is requested to provide an outline Replacement Phase Traffic Management Plan, setting out measures to be implemented to manage the impact of traffic associated with the replacement of the solar panels et al, potential movement of HGV vehicles, the vehicle activity of bringing and removing material/ equipment on and off site, and procedures for monitoring, review, enforcement and corrective measures in the event of any breaches. **Impact 3: Decommissioning Phase** a) **Positive:** no positive traffic and transport impacts arising from this phase have been identified. b) **Neutral:** no neutral traffic and transport impacts arising from this phase have been identified.	

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	c) Negative: i. This phase will generate additional vehicle movements on the highway network, including increased HGV activity. The ES states that the number of vehicle movements required during this phase is not known at this stage, but that it would likely be similar to or less than that of the Construction Phase. On this basis, the traffic and transport effects of the Decommissioning Phase were scoped out of the ES, as agreed with the Examining Authority. ii. Assuming that this phase would generate a similar level of vehicle activity as the Construction Phase, the negative impacts are also likely to be similar to those identified for the Construction Phase and consequently comments made and Matters identified should be read across both phases. **Mitigation 3: Decommissioning Phase** Assuming that this phase would generate a similar level of vehicle activity as the Construction Phase, the negative impacts are also likely to be similar to those identified for the Construction Phase and consequently mitigation measures as identified should be read across both phases. **Contractual (all Phases):** 1. To be secured through the DCO Agreement through s278 (Protective Provisions) and relevant Management Plan(s): – potential long-term neutral impact. 2. It is noted that various Monitoring Fees are to be requested by the Council to monitor the traffic and transport management plans as tabled by the Applicant, to be undertaken through a s106 Agreement or similar.	

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11.15	Matter 48 Travel Plan: it is noted that there appears to be limited information regarding staff travel (Travel Plan) other than broad assumption that some people would car-share to Site, and that minibuses between sites may be provided. The Council suggest that this is insufficient information (Ref. PEIR Report, 2024). The [APP-156] outline Construction Traffic Management Plan para4.5.3 makes reference to a Construction Staff Travel Plan - this will require considerable greater detail and intent to address the requirements of policy to enable modal shift and reduce carbon footprint. It is noted that no Travel Plan Monitoring Fee for say the construction phase is suggested; this should be included within the [APP-016] DCO Agreement. **Matter 48 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. While an outline Construction Worker Travel Plan has now been provided as an appendix to the oCTMP, greater clarity on how the proposed Plan is to be implemented, monitored, and enforced to deliver the stated 2 persons/ trade-vehicle travel mobility requires further discussion. ii. [APP-156] CTMP and Travel Plan to include ongoing monitoring of staff traffic and vehicle occupancy with a clear commitment to implement the minibus service if vehicle occupancy is below that assumed for the assessment. This commitment should related to all construction vehicle activity across all phases. d) **Contractual:** to be secured through the DCO Agreement and relevant Management Plan(s): – potential long-term neutral impact.	An outline Construction Workers Travel Plan has been prepared and submitted as Appendix B of the updated **oCTMP [REP1-034]**, submitted at Deadline 1. This sets out a framework for how the final CWTP will be monitored and implemented. The Applicant will continue to consult with BBC on the detail of this matter, which would be finalised upon discharge of the DCO Requirements. . In terms of the request for a s.106 agreement and Monitoring Fee from the Applicant, this is not agreed, please refer to the Applicant's response to 'Matter 14' which addresses these matters in detail.

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	e) The Council will seek a s106 Travel Plan Monitoring Fee from the Applicant for the duration of the construction vehicle activity on the Public Highways to monitor the Applicant's commitments.	
11.16	Matter 49 Construction Activity: it is noted that the various sites may be under construction over a similar period, and this would suggest that there may be on-site, off-site travel, and construction movement between the sites which appears not to have been addressed by the Applicant (Ref. PEIR Report, 2024) (Ref. Planning Inspector's Scoping Opinion ID2.1.9). **Matter 49 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. While the Applicant has suggested various on-site haul roads between sites, a detailed traffic movement mapping regarding such routing and related impacts is required to conclude matters. ii. Further, the Applicant proposes several sub-construction sites across the Proposed Development – how construction and trade traffic is to be implemented, monitored, and enforced to adhere to such routes needs to be addressed within any Construction Staff Travel Plan and Construction Traffic Management Plan [App-156]. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term neutral impact.	The distribution of construction traffic along the public highway network between the various Site areas is illustrated within Figures 14, 15 and 16 of **ES Vol 2 Appendix 9-2 Traffic Flow Diagrams [APP-102]**. The assessment of impacts resulting from this forecast level of traffic generation is set out within Section 9.8 of **ES Vol 1 Chapter 9 Traffic and Transport [APP-045]** and Section 6.0 of **ES Vol 2 Appendix 9-1 Transport Assessment (the TA) [APP-101]**. The trip generation forecasts include for the proposed provision of an internal minibus shuttle service to transport construction staff from the main construction compound to the wider areas of the Site, as described within Section 4.4 of the **outline Construction Traffic Management Plan [REP-034]**. The **oCTMP [REP1-034]** also includes a plan at Appendix C illustrating the proposed access route for HGVs to and around the Site, including areas where internal haul roads would be used. Section 9.1 identifies that the Applicant is currently undertaking investigations into the feasibility and potential to introduce either an automatic number plate recognition (ANPR) system or a GPS-based geofencing system on key routes to help monitor and enforce the prescribed HGV delivery routes. BBC, as well as CCC and National Highways, will be kept appraised of the outcome to those investigations. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.
11.17	Matter 50 Visibility splays: one of the comments made by Cambridgeshire County Council (CCC) at Statutory Consultation related to the visibility splays at accesses SA14 and SA15. It was noted that Observed vehicle speeds are indicated at 41.4 mph 85%ile	Visibility splays at each of the proposed new permanent Site accesses, including those accesses which will comprise the upgrade of an existing field access, have been determined based on the guidance and standards set out in the DMRB.

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	speeds and that, as this is above the Manual for Streets (MfS) threshold of 37mph, this would require to be derived from Design Manual Roads and Bridges (DMRB) not Manual for Streets criterion. It further noted that correct visibility splays would need to be 109m not the indicated 69m. The available splays were therefore requested to be increased in these locations and to supply locations of speed surveys and data. The Applicant's response to this was *'The site accesses will be situated within a section of Moor Road featuring several sharp bends. As such, it is likely that vehicle speeds in the vicinity of the accesses will be significantly lower than the observed speeds used in the visibility calculations. Accesses SA14 and SA15 would also only be used during the construction and decommissioning phases. Use of these accesses would therefore be relatively infrequent. It is therefore considered that interpolating from MfS visibility distances in this case is appropriate'*. The use of MfS to determine suitable visibility splays in these locations is not considered appropriate and there are concerns that this creates road safety issues with insufficient visibility provided at these accesses. The construction and decommissioning phases have been scoped into the assessment and therefore the effects cannot be dismissed on the basis that use is 'relatively infrequent'. Whilst noting that accesses SA14 and SA15 lie within Cambridgeshire, there are similar issues at accesses SA17, SA18, SA19 and SA20 (within Bedfordshire) where MfS has been used to determine visibility splays. In these locations DMRB should be used to determine visibility splays. **Matter 50 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:**	For completeness, visibility splays based on the observed traffic speeds / posted speed limits, as well as the temporary reduced speed limits, are also shown on Figures 1 to 14 in Appendix D of the updated **oCTMP [REP1-034]**. The majority of the proposed temporary access points – specifically accesses SA14, SA15, SA17, SA18 and SA19 – are situated in locations where it is not possible to achieve a full DMRB-compliant visibility splay in one or both directions. Accordingly, it is proposed that speed restrictions and traffic management measures will be implemented to ensure the safe movement of construction traffic at these junctions. In order to manage the safe movement of construction traffic along the temporary access road, particularly at the crossings over Moor Road between accesses SA14 and SA15, Spring Hill Road between accesses SA10 and SA11, and Green End between accesses SA07 and SA08, additional temporary traffic management would be deployed as necessary, as authorised by the DCO in accordance with the **Traffic Regulation Measures Plan [REP1-004]**. Accesses SA17, SA18, SA19 and SA20 would only be used during construction of the cable connection and the total number of daily vehicle movements using these junctions would be very low (approximately 14 two-way movement per day maximum) The identified visibility splays calculated in accordance with MfS are therefore considered to be appropriate based on the temporary nature of these works. The updated indicative site access arrangement drawings included in Appendix D of the oCTMP include visibility splays drawn to the tangent of the curve where accesses are situated on bends. As confirmed in the Applicant's **Written Summary of Oral Submissions at Issue Specific Hearing 2 (ISH2) [REP1-059]**, the required visibility splays would not require the removal of any hedgerows but could involve annual pruning of hedgerows to ensure that foliage does not grow out and obstruct visibility.

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	i. The Applicant has submitted plans of the proposed site access points showing the visibility splays. At several locations visibility splays have been based on Manual for Streets (MfS) requirements. However, based on the access locations and measured vehicle speeds, the use of MfS in these locations is not appropriate and visibility splays should be based on the Design Manual for Roads and Bridges (DMRB), which are more onerous. There are concerns that this creates road safety issues at these accesses. ii. Most of the access points now show splays based on DMRB requirements, but there are a number that still need to be updated from MfS, as identified below. It appears that the application boundary has been set according to the MfS splay in some locations, so this will either need to be changed, or measures proposed by the applicant which reduce the visibility splay requirement (e.g. temporary traffic signals, management control, speed limit reductions). However, due to the setting and nature of the roads, the visibility splays should still be based on DMRB requirements irrespective of the measures proposed. iii. The visibility splays are shown on OS Base mapping and consequently does not show the extent of existing hedgerows, trees or other features which could constrain visibility below the level indicated. Consequently, it is not known to what extent tree and hedgerow removal will be required, over and above general maintenance cutting of hedgerows, this will be a consideration for others such as ecology/arboriculture. iv. In various locations, the swept paths provided show that two-way movement is not possible. There are situations where construction vehicles cross or use a short section of public highway, where there is no provision for vehicles to pass in opposite directions – the haul roads are not sufficiently wide for vehicles to pass, not is the section of public highway.	The updated indicative site access arrangement drawings also include indicative widening to the internal haul roads at the main intersections of the permanent Site access junctions, to facilitate two-way HGV movements. Further widening can, if deemed necessary, be included and confirmed at the detailed design stage. However, the Applicant will continue to consult with the relevant highway authorities in relation to any additional clarity or commitment that may be considered necessary in this regard. The Applicant agrees that the necessary management and mitigation measures can be secured through the relevant Management Plan(s) and that there would be a neutral impact.

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<tr><th>Para Ref.</th><th>BBC Local Impact Report Comment</th><th>Applicant Response</th></tr>
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However, at least on the BBC highway sections, there appears to be scope for the Applicant to introduce measures to manage this. For example, provision of a widened section on each of the haul roads as they approach the public highway to allow a vehicle to be held, with marshalls using radios to ensure that the public highway is only used in one direction at any one time.
v. Furthermore, some of the visibility splays are drawn incorrectly (where the access is on the outside of a bend) and it is unclear from the plans supplied whether there are trees/hedgerows or other obstructions which will need to be removed to achieve the correct splays.
vi. The Applicant is requested to resubmit drawings of the proposed site accesses showing appropriate visibility splays based on DMRB requirements, vehicle swept paths which demonstrate how two-way movement of construction traffic can be accommodated, and any supplementary traffic management required to ensure safe operation to the approval of the local highway authority.
vii. The Council set out a provisional technical review on access plans submitted:
<table>
<tr><td>Fig 1</td><td>SA01</td><td>Vis splays missing – should be provided. Access is existing, but use will be intensified by the proposed development and so demonstration of suitable visibility splays is required.</td><td rowspan="2">No intervisibility between passing points, but passing is possible on the haul roads. This arrangement should operate with control/marshalling to ensure opposing vehicles do not enter the highway at the same time.</td></tr>
<tr><td></td><td>SA02</td><td>Vis splays provided based on DMRB</td></tr>
<tr><td>Figs 2a/b</td><td>SA03</td><td>Vis splays provided based on DMRB. Vis splay doesn't tangent with kerb line.</td><td>Vehicles unable to pass – details should be provided of how this will be managed, including provision of</td></tr>
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Para Ref.	BBC Local Impact Report Comment	Applicant Response
	<table><tr><td></td><td>SA04</td><td>Vis splays provided based on DMRB</td><td>holding/passing places, where necessary.</td></tr><tr><td rowspan="2">Figs 3a/b</td><td>SA05</td><td>Vis splays provided based on DMRB. Vis splay doesn't tangent with kerb line.</td><td rowspan="2">Vehicles unable to pass – details should be provided of how this will be managed, including provision of holding/passing places, where necessary. SA05 is limited to rigid vehicles only.</td></tr><tr><td>SA06</td><td>Vis splays provided based on DMRB</td></tr><tr><td rowspan="2">Fig 4</td><td>SA07</td><td>Vis splays provided based on DMRB</td><td rowspan="2">Vehicles unable to pass – details should be provided of how this will be managed, including provision of holding/passing places, where necessary.</td></tr><tr><td>SA08</td><td>Vis splays provided based on DMRB</td></tr><tr><td>Fig 5</td><td>SA09</td><td>Vis splays provided based on DMRB. Vis splay doesn't tangent with kerb line.</td><td>Vehicles unable to pass – details should be provided of how this will be managed, including provision of holding/passing places, where necessary.</td></tr></table> viii. The Applicant makes the general comment that the final management measures will be submitted for approval for each access, but site-specific management measures have not provided at this stage for the Council to assess and comment – consequently this remains unconcluded. ix. It is suggested that this is resolved in association with Matter 8. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term neutral impact.	
11.18	Matter 51 Highway modelling links: for the highway assessment, only links have been assessed; no junction counts were conducted, and no junction assessments were carried out. Justification has been provided by the Applicant *'Section 5.5 of ES Vol 2 Appendix 9-1: Transport Assessment [EN010141/DR/6.2] identifies that the Scheme*	The Applicant would note that there are only two junctions within the study area that fall within the jurisdiction of BBC (Great Staughton Road / Spring Hill and Great Staughton Road / Little Staughton Road / Green End).

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	would not generate more than thirty two-way movements during peak hours, which is the threshold at which junction assessments are required as identified in Cambridgeshire County Council's Transport Assessment Requirements'. Therefore, the Applicant has not included any junction capacity assessments on the basis that construction traffic in the network AM and PM peaks (8am-9am and 5pm-6pm) is below the trigger of thirty two-way trips. However, in the hours of staff arrivals and departures (7am8am and 6pm-7pm respectively) the combined baseline plus construction traffic flows exceed the network peak flows by significantly more than thirty two-way trips and therefore an assessment of impacts at key junctions should be undertaken. **Matter 51 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** an assessment of impacts at key junctions should be undertaken and submitted for discussion and written approval by the local highway authority. d) **Contractual:** to be secured through the Management Plan(s): – potential long-term neutral impact.	The baseline traffic count data used in the assessment indicated that the peak hour flows along Great Staughton Road, Spring Hill and Green End were extremely low (generally fewer than 100 two-way movements along each road in each highway peak hour). As such, it was not considered that these junctions suffered from existing capacity constraints that would require specific investigation within the **TA [APP-101]**. Furthermore, the number of construction traffic movements through these junctions during highway peak hours would be minimal. As described within Section 4.4 of the **oCTMP [REP1-034]**, an internal minibus fleet would be deployed to shuttle construction staff to/from the main construction compound to the wider areas of the Site. Compliance with the oCTMP is secured via Requirement 8 of the **draft DCO [REP1-005]** which requires the submission to and approval by the local planning authority of a detailed CTMP, in substantial accordance with the oCTMP. The Applicant would also note that the Relevant Representation from CCC (reference CCC-RR-44 in **[REP-055]**) acknowledges that: *"There are no significant concerns in respect of the volume of traffic during the construction period as the staff movements will be during the AM and PM peak shoulders and not the peak hours"*. On this basis, it is not considered that any further detailed assessment of junction capacity on the local highway network during the highway peak hours is required. However, additional analysis of the A1 / B645 junction in St Neots has been undertaken at the request of National Highways (reference NH-RR-02 in **[REP-055]**) to provide further detail on the likely impact on the A1 during the construction phase. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.

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11.19	Automatic Traffic Count: the results from the Automatic Traffic Count (ATC) surveys have been presented in Table 9.8. It is noted that both 2022 and 2024 survey data has been used to determine the baseline traffic flows for the assessment. Whilst a consistent set of traffic survey data would be preferred the baseline data is considered to be acceptable.	The Applicant notes and acknowledges that BBC are satisfied that the traffic count data provided within the **TA [APP-101]** is acceptable.
11.20	The Personal Injury Accident (PIA) data was obtained for the most recently available five-year period and analysis was provided on the severity of collisions to inform the road safety assessment. This aspect of the assessment is considered to have been carried out correctly.	The Applicant notes and acknowledges that BBC are satisfied that the appraisal of accident data within **the TA [APP-101]** has followed a robust methodology.
11.21	Transport Assessment: the assessment of likely impacts and effects in the construction phase has been reviewed. Staff numbers are provided for the full 30-month construction period (average of 496 staff) and for the peak months 7-24 (average of 705 staff), with a maximum of 854 staff in month 12. The average daily construction trip generation has been calculated for three scenarios: Period of Maximum HGVs (Month 2); Period of Maximum Staff (Month 12); and Average across the whole construction period (30 months), which is considered a robust assessment methodology.	The Applicant notes and acknowledges that BBC are satisfied that the appraisal of trip generation within **the TA [APP-101]** has followed a robust methodology.
11.22	The justification for assigning a Low sensitivity to all assessed highway links has been provided and the % increases in total traffic and HGVs have been reported to assess the magnitude of impact and overall significance of effects. For the magnitude of impact, justification has also been provided on the assignments for each assessment criteria. The Council are satisfied that a robust assessment methodology has been used to assess the impact of construction traffic on the highway and PRoW network.	The Applicant notes and acknowledges that BBC are satisfied that the appraisal within **ES Vol 1 Chapter 9 Traffic and Transport [APP-045]** has followed a robust methodology.

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11.23	Matter 52 Minibus service: [APP-101] Transport Assessment includes an estimate of construction staff traffic based on an assumption of an average vehicle occupancy of two people. Section 5.4.4 states that the Applicant will *'explore the provision of staff minibuses where appropriate during peak periods of construction activity', to provide staff transport to 'nearby transport hubs, town centres and/or local accommodation'*. Monitoring staff traffic and vehicle occupancy should be included in the CTMP/ Travel Plan and a clear commitment provided to implement the minibus service if occupancy is below that assumed for the assessment. This commitment should be written into the [APP-016] DCO Agreement. **Matter 52 (LIR):** - as identified and assessed: to be cross-referenced with Matter 48.	The Applicant notes this comment. An outline Construction Workers Travel Plan has been prepared as an appendix to the **outline Construction Traffic Management Plan [REP1-034]** This includes a proposed mechanism for monitoring staff traffic and vehicle occupancy and includes a commitment to provide minibus transport to the main Site compound during peak construction periods. This document will form part of the overall Construction Traffic Management Plan which is secured via Requirement 8 of the **draft DCO [REP1-005]**.
11.24	Matter 53 Vehicle tracking: vehicle tracking for each of the proposed site accesses is included in Annex C of the [APP-101][102] Transport Assessment (also ref [APP-124]). However: **Matter 53 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. In many locations the vehicle tracking runs outside the proposed access and therefore does not provide evidence that the access points are safe and feasible. The Applicant should resubmit with further detail showing fully dimensioned plans of each access along with tracking showing two-way (simultaneous) movements of the largest vehicles which will use them. The visibility splay drawings should also be updated to be consistent with any changes to the accesses.	The Applicant notes this comment. Outline junction design drawings, including junction dimensions and updated vehicle tracking and visibility splays have been provided, as an appendix to the **outline Construction Traffic Management Plan [REP1-034]**. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.

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	ii. In all cases, access points should include visibility splays and assumptions regarding the potential removal of existing and/or instated hedgerows which may limit visibility. iii. To be cross-referenced with Matter 8 and 50. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term neutral impact.	
11.25	Matter 54 DCO boundary: Figure C5 in Annex C includes tracking for the Great Staughton Road/ Little Staughton Road junction and indicates that mitigation is required in the form of widening that falls outside the DCO boundary and within third-party land. **Matter 54 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** this needs review by the Applicant. i. Mitigation is proposed at the Great Staughton Road/Little Staughton Road junction in the form of junction widening but the extent of the works shown falls outside the DCO boundary and is within third party land. The Applicant should amend the mitigation proposals to demonstrate that appropriate mitigation can be delivered at this location. ii. Applicant to review tracking to establish exact technical requirement should the Public Highways need widening. iii. Prepare detailed design drawings to be submitted to the local highway authority for approval, including any agreements that may need to be concluded. iv. Due to the sensitivity of the B-road local network, such agreements should be concluded as part of the Examination and not post Examination. v. To be cross-referenced with Matter 8 and 50.	The Applicant notes that there is a minor discrepancy in the position of the Order limits on the plan included within Annex C of the **TA [APP-101**]. The Order limits do encompass the full extent of the proposed works, as illustrated on Sheet 6 of the statutory **Location, Order Limits and Grid Coordinate Plan [APP-007]**, and the updated outline junction design drawings as provided as an Appendix to the **oCTMP [REP1-034]**. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	d) **Contractual:** to be secured through the detailed drawings, relevant Management Plan(s), and agreements: – potential long-term neutral impact.	
11.26	Matter 55 Stage 1 Road Safety Audits (RSA): a RSA for each site access have not been provided. **Matter 55 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** Stage 1 RSAs detailed design resolution should be undertaken for each site access prior to the conclusion of the Examination as this may highlight additional matters not yet addressed. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term neutral impact.	The Applicant notes this comment. The exact nature of the RSAs required will be discussed with the LHA. The Applicant would be happy to obtain Stage 1 RSAs of the indicative site access drawings as included in Appendix C of the **oCTMP [REP1-034]**. However, Stage 2 RSAs would only be undertaken at the detailed design stage, which would be post-determination. Detailed access designs will be submitted for approval by the relevant local authority as secured by Requirement 3 of the **draft DCO [REP1-005]**. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.
11.19	Matter 56 DCO Agreement (Highways) **Matter 56 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s): i. It is specifically noted that the Applicant is seeking for 'Acquisition of Rights' of affected Public Rights of Way (PRoW), and 'temporary possession' of the Public Highways at Site access points including the impact of visibility splays through the [APP-016] DCO Agreement the Applicant (refer to Appendix 1). ii. In this regard the Council refers to Aspect 1.1 to 1.5 setting out the Council's concern regarding the general wording of 'Proposed Development' and the DRAFT DCO Agreement; Chp. 11 Traffic and Transport and Chp. 12 PRoW and	As set out in the Apploicant's response to paragraph 11.1 of BBC LIR, the Applicant considers that the **draft DCO [REP1-005]** and the relevant management plans provide the appropriate mechanism for approval of any works within the public highway. The Applicant agrees that the effect would be neutral. Further commentary on the request for a s.106 agreement and or monitoring payments is provided in the Applicant's response to BBC LIR Matter 14 above.

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	Bridleways which suggests that these Aspects have yet to reach technical resolution and consequently the effect lands, as illustrated by the Applicant (attached as Appendix 1) remains far from resolved. iii. Consequently, and in discussion with the other Host Authorities, the Council are NOT supportive of suggested powers and have noted with the Applicant that the Council would prefer to see a s278 with Protective Provisions within the DCO Agreement. This is currently the Council's working position. iv. iv. To address this matter in detail, in agreement with the Applicant, the Host Authorities have instructed legal review of the DCO Agreement, with review meetings set up with the Applicant 17 April to discuss. b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. The [APP-016] DCO Agreement should include provision for the Council as highway authority to approve the design and standard of construction of any works within the public highway, and clauses affording protection to the highway authority by including rights to carry out inspections and to certify that altered highways have been constructed to a standard acceptable to the highway authority. ii. The DCO Agreement should include financial provision through a s106 or similar for the Council as highway authority to enable such monitoring. d) **Contractual:** to be secured through the DCO Agreement, Protective Provisions, s106/s278, and relevant Management Plan(s): – potential long-term neutral impact.	

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12.1	LVIA corridors: the Council's concern is that PRoWs are important public routes which need to be assessed as *'sequential visual effects'* corridors (Applicant's Scoping para7.6.3iv), rather than addressed as a single viewpoint within a LVIA study. This approach should be recognised at the onset of the Application (Ref. Scoping Report, 2023). It is suggested that the DCO Application has recognised this Scoping matter and assessed accordingly.	The Applicant notes the Council's comment regarding the approach to PRoW assessment and welcomes the Council's acknowledgement that the DCO Application has recognised this Scoping matter and assessed it accordingly.
12.2	Matter 57 Technical specification: Applicant - *'to be set within wide green corridors'*. The Council is concerned that this is not imperially defined and would like to see the proviso of a minimum PRoW corridor width set at 8m for footpaths and 9m for bridleways (PRoWs form important habitat and landscape corridors, rather than as narrow pathways, hence the matter of width); and, the Council seeks clarification how these are to be retained, managed, and enhanced within any Outline CEMP and Outline LEMP, including funding of such for the duration of the Scheme (Ref. Scoping Report, 2023). In [APP-045] Traffic and Transport para 9.7.17 the Applicant states that *'at all times, the definitive PRoW width would be retained as a minimum width for any temporary PRoW diversion'*; and, in [APP-160] outline PRoW Management Plan para6.4.2 *'…Pertenhall 26 bridleway …comprises a width of approximately 4.5-5m along the impacted section of the PRoW, along with a grass verge that varies between 1 and 3m wide, and as such there is generally sufficient width for PRoW users to safely pass vehicles approaching…',* para 7.1.3 *'The definitive widths of public rights of way…',* para7.1.4 *'Where public rights of way are within areas identified as grassland… a strip of grassland will be cut to a minimum width of 2m, or in accordance with the definitive width of the public right of way, whichever is wider',* para7.1.6 *'The final route, surfacing material, permitted user groups and widths of proposed permissive paths will be defined in the full PRoW Management Plan'*	The Scheme's design establishes a minimum offset of 10m from the centreline of the definitive PRoW alignment to any solar fenceline, regardless of whether the PRoW is a footpath or bridleway. The Applicant notes this exceeds the request from the Council for these to be 8m or 9m wide corridors. This buffer is secured at paragraph 3.4.1 of the **oLEMP [REP1-040]**, and by the limits of deviation of the **Works Plan [APP-009]**. In terms of the widths of routes, the definitive width of each PRoW will be maintained as set out at paragraph 7.1.3 of the **outline Public Rights of Way Management Plan (oPROWMP) [REP1-042]**, and at paragraphs 6.4.14 and 6.4.15 of the **oLEMP [REP1-40]**. Where PRoWs pass through areas managed as grassland, the outline LEMP commits to cutting a strip to a minimum width of 2m, or the definitive width if wider, and maintaining that strip so grass does not exceed 150mm during the summer months, to support clear wayfinding and use. The approach would be secured with approval from the local highway authority through DCO requirements which require the relevant management plans to be approved and implemented. Requirement 4 of the **draft DCO [REP1-005]** requires a LEMP for each phase to be submitted and approved; Requirement 11 requires a PRoW management plan (in substantial accordance with the outline PRoW Management Plan) to be submitted and approved (in consultation with the relevant highway authority) for any PRoW sections shown to be temporarily stopped up or diverted, and then implemented as approved.

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12.3	Matter 58 Scheme activity: Applicant - *'During the operational phase (and read replacement phase) it is anticipated that there will be around 10-16 staff on-site at any one time, primarily undertaking maintenance tasks'*. **Matter 58 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. No information has been issued and/or clarified by the Applicant regarding the movement of construction, trade, and maintenance vehicles between the central construction compounds and the location of the sub-compounds, solar arrays, BESS, landscape and PROW/ permissive routes (the Site), etc. during the operational (maintenance), replacement and the decommissioning phases and the potential impact on the existing Public Highways, PRoW network, proposed permissive routes, and matters of related public safety. This matter remains unconcluded and requires to be addressed; i.e. how do the staff access the various sites. ii. This matter is pertinent as the Applicant proposes to use some of the PRoWs for the Construction Phase traffic but it is not clear if a similar approach is to be used for the other phases. d) **Contractual:** to be secured through the DCO Agreement (Protective Provisions) and relevant Management Plan(s): – potential long-term neutral impact.	Outline information regarding the anticipated traffic movements during the operational phase is provided within Section 2.6 of **ES Vol 1 Chapter 2 The Scheme [APP-038]**. There would be no construction compounds within the Site during the operational phase. Vehicle movements between the various Site areas would use the public highway. There would be approximately 20 full time equivalent (FTE) roles based on-site during operation, of which approximately 12 would be working on site maintenance, with 3 working on land management. Maintenance access to the Site on a regular basis (outside of major replacement campaigns) would be by small van or four-wheel drive vehicle. The number of daily vehicle movements during the operational phase would be minimal. The internal Site access tracks will be designed to be sufficiently wide to allow Site traffic to safely pass PRoW users along those sections where the access track follows the route of a PRoW. As set out in response to Matters 2 and 3 of the BBC LIR, the applicant is in the process of preparing a Technical Note to assess substantial replacement of panels in the operational phase. This includes assessment of traffic and transport related matters and will be submitted at examination Deadline 3. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.
12.4a	Matter 59 Public access: there must be no adverse effect on public enjoyment as a result of the Scheme, and therefore any possible loss of use and visual amenity on any of the PRoW routes must be fully considered. The Council has a statutory duty in respect of PRoWs to	The Scheme has been designed on the basis that PRoW should be retained and remain attractive and safe to use. The **Design Approach Document [APP-034]** explains that where PRoW pass through the Scheme, the Applicant proposes 'green lanes' within wide green corridors, intended to protect recreational

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	ensure that members of the public are not inconvenienced in their access and use of PROW. Where works are required within/ across PRoW, for example where construction access or cable routes utilise or cross PRoWs, the Applicant will need to seek prior notice to the commencement of development to be submitted to and approved by the Council. Further, during the construction phase, and possibly the operational phase – replacement, temporary closures may be required that affected PRoWs (Ref. PEIR Report, 2024).	experience while also delivering ecological connectivity. The design approach has also been to provide wide set-backs to maintain the openness of key views from PRoW, whilst using planting to screen oblique views of the solar development. In relation to the Council's request for prior notice and approval arrangements where works are required within or across PRoW, Requirement 11 of the **draft DCO [REP1-005]** provides that no phase may commence until a PRoW management plan, for any sections shown to be temporarily stopped up or diverted, has been submitted to and approved by the relevant local planning authority in consultation with the relevant highway authority, and that the plan must then be implemented as approved. The final PRoW management plan(s) must be in substantial accordance with the **outline PRoWMP [REP1-042]** submitted with the application.
12.4b	While [APP-016] DCO Agreement Clause 13(2) deals with works and consents required regarding 'constructed altered or diverted' footpaths or bridleways, this does not address the complexity of [APP-010] Street Works, Rights of Way and Access Plan which indicates: a) 'Temporary prohibition or restriction of use of public right of way'('temporary stopping'); b) 'Proposed managed crossing point'; c) 'Permanent use of motor vehicles over public rights of way'; d) 'Extent of temporary public right of way management measures'; e) 'Alteration of streets – permanent'; and, f) 'Alteration of streets – temporary'. g) This should also be understood in terms of DCO Schedule 4 'cable works'. These matters should be viewed as significant as they effect the public's statutory rights in using PRoWs and Bridleways. This matter remains unconcluded and requires to be addressed.	The detail of the works to be undertaken as set out in the **Street Works, Rights of Way and Access Plan [APP-010]** should be read in conjunction with Articles 13, 14, 15 and 16 of the **draft DCO [REP1-005]** in their entirety. These articles are supported by the relevant schedules of the **draft DCO [REP1-005]**

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M59 (LIR)	**Matter 59 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. It is suggested that the Applicant to table a comprehensive strategy regarding PRoW, namely: affected routes, potential vehicle routes, potential changes materiality of routes, damage to landscape adjacent to routes if used by construction vehicles, programme of applying for licenses, etc. – as to be discussed and agreed with the Council. ii. Where works are required within/ across PRoW, for example where construction access or cable routes utilise or cross PRoWs, the Applicant will need to seek prior notice to commencement of development to be submitted to and approved by the Council. iii. Further, during the construction activity (all phases), replacement, temporary closures, etc. may be required that may affect PRoWs. The Applicant will need to seek prior notice. iv. It is noted that some of this intent is presented by the Applicant across various documents, this should rather be consolidated into the [APP_160] Public Rights of Way Management Plan including measures of monitoring, enforcement, and funding of the Council to monitor the Plan. d) **Contractual:** to be secured through the DCO Agreement and relevant Management Plan(s): – potential long-term neutral impact. e) The Council will seek a s106 PRoW/ Highways Monitoring Fee from the Applicant for the duration of the Proposed Development to monitor the Applicant's management, maintenance, and delivery of the PRoW commitments as made by the Applicant.	The Applicant considers that the matters raised by the Council are substantially addressed through the outline Public Rights of Way Management Plan (oPROWMP) **[REP1-042]**, when read alongside elements of other management plans, namely the oCEMP **[REP1-032]**, oOEMP **[REP1-036]** and oLEMP. **[REP1-040]** The oPROWMP **[REP1-042]** identifies the PRoW network within the Order Limits and explains for each route whether there is no direct effect, a construction crossing, a temporary localised diversion for cabling, or use of part of the route as a construction access road. With specific regard to the Council comments on desired mitigation measures, it is relevant to note that the oPROWMP includes: • Details of the overall construction access strategy, • a hierarchy of PRoW management measures, • details regarding warning signage, • details of managed crossing points, • the need for temporary fencing and banksmen where required, • equestrian-specific controls on bridleways, • surfacing and reinstatement provisions, and • the requirement for any final surfacing details to be agreed with the relevant planning authority in consultation with the highway authority The document makes it clear that, before any phase involving temporarily stopped up or diverted PRoW may commence, a final PROWMP must be submitted to and approved by the relevant planning authority, in consultation with the relevant highway authority. Thus, the Council would receive prior notice and agreement before any works proceed that may affecting a PRoW. The proposed measures for monitoring and enforcement are also addressed. Sections 8 and 9 of the oPROWMP require the final plan to include named roles and responsibilities, procedures for monitoring, inspection and reporting, stakeholder communications, staff training, emergency procedures, record

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		keeping and review. Those provisions are reinforced by the oCEMP, which requires the Environmental Manager to monitor compliance, document inspections and complaints, implement corrective action, and make records available to the local planning authority on request. The oCEMP also confirms that the final PROWMP will manage any temporarily closed sections of PRoW during construction and that PRoW diversions will be highly localised and phased to minimise their duration. For the operational phase, the oPROWMP, oOEMP and oLEMP confirm that PRoW would be kept free from obstruction, maintained to their definitive width, and managed so that grassed routes remain legible and usable, with any temporary operational closures to be agreed with the relevant authority if they are ever required. Given that the measures are all substantially addressed within the oPROWMP, when read with other documents specifically prepared for certain phases of the development, the Applicant does not consider it necessary for the production of a consolidated document as suggested by the Council. In terms of the request for a s.106 agreement and Monitoring Fee from the Applicant, this is not agreed, please refer to the Applicant's response to Matter 14 which addresses these matters in detail.
12.5	Matter 60 Access: in principle the Council is NOT supportive of using the PRoW Footpaths in the construction phase, and possibly in the operational (replacement) phase, for construction and maintenance vehicle access. This approach raises significant use, pedestrian safety, and horse-riding usage issues. While the Applicant has set out measures (Ref [APP-160]), in all cases this favours vehicle movement at the inconvenience of the footpath and bridleway user. Further, no mitigation measures have been proposed should such vehicle activity damage the existing hedgerows and tree planting framing various PRoW.	The Scheme has been progressed on the basis that the use of PRoW for construction access is minimised wherever practicable, but where the interface cannot be avoided it is controlled through a safety-led hierarchy of measures set out in the **oPRoWMP [REP1-042]**, including keeping routes open where it is safe to do so, managed short closures, and (where necessary) temporary full closures with diversion routes. In response to the concern that the current approach prioritises vehicle movements over PRoW users, the **oPRoWMP [REP1-042]** includes measures that are expressly intended to segregate users from construction traffic where a PRoW is to be used as access routes. By way of example, for Pertenhall 29 it is

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	The approach as set out in this regard in [APP-010] Street Works, Rights of Way and Access Plan, [APP-160] PRoW Management Plan Chp.6, and [APP-016] DCO Agreement is not supported.	proposed a temporary PRoW diversion immediately adjacent to the existing alignment with temporary fencing to segregate users from construction vehicles. For bridleways, the **outline PRoWMP [REP1-042]** provides for equestrian-specific warnings, including signage requiring drivers to stop when horses are passing. The management plan further commits to safety fencing along PRoW where they are contiguous with construction areas unless an existing defensible barrier is present. The **oCEMP [REP1-032]** sets out that existing trees and hedgerows will be protected during construction in accordance with BS 5837:2012.
12.6	Matter 61 Access maintenance: details of maintenance management for hedgerows and additional landscape planting along buffer routes and green lane corridors should be included in the PRoW management plan (Ref. PEIR Report, 2024) (Ref. Planning Inspector's Scoping Opinion ID3.8.1.6). In [APP-160] outline PRoW Management Plan the Applicant does not set out how the PRoWs are to be maintained for active pedestrian and bridle usage if they are to be used for construction activity. At all times a usable surface should be maintained for pedestrian and bridle usage. This should include maintaining adjacent planting verges/ hedgerows. This matter is not addressed in the DCO Application.	The Applicant has amended the oPROWMP to introduce a new sub-section on surfacing and reinstatement of PRoW at paragraphs 5.1.6 to 5.1.8 of the **oPROWMP [REP1-042]**. This requires the Applicant to provide detailed surfacing details of each PRoW alongside the final PRoW Management Plan. which is in substantial accordance with the oPROWMP Requirement 11 of the **draft DCO [REP1-005]**provides that a final PRoW Management Plan must be approved by the local planning authority in consultation with the relevant highway authority prior to any phase of the authorised development commencing. This provides further assurance to the Council as to the final sign-off for any changes to PRoW. The **oLEMP [REP1-040]** includes management measures for planting and vegetation adjacent to PRoW corridors. It includes measures directly relevant to keeping PRoW corridors usable, including maintaining definitive PRoW widths. Monitoring and the ability to adjust management prescriptions is also set out within the oLEMP, including review provisions and reporting to the local planning authorities.
12.7	Matter 62 PRoW corridors approval: details of enhancement, reinstatement, and new routes, not limited to the restoration of paths to an acceptable condition and including hedgerow planting if applicable, must be submitted to and approved by the Council.	The Applicant has amended the **oLEMP [REP1-040]** to provide additional detail of the proposed permissive paths, at paragraphs 5.3.41 to 5.3.43 and Table 2 of the oLEMP.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Details should be provided regarding the proposed permissive paths, which should be multi-use routes suitable for walkers, cyclists and equestrians. Routes should improve connectivity and provide recreational enhancement for users. Hard and soft technical specification are required (Ref. PEIR Report, 2024). In [APP-160] outline PRoW Management para7.1.6 it states that *'new permissive pathways … final route, surfacing material, permitted user groups and widths of proposed permissive paths will be defined in the full PRoW Management Plan'*. The Council would require that this is resolved and any technical requirements are incorporated into the DCO Agreement.	The final route, surfacing material and widths of proposed permissive paths will be defined in the final LEMP. This gives the Council the technical approval they require, as a final LEMP must be submitted to the Council for approval in accordance with Requirement 4 of the **draft DCO [REP1-005]** prior to commencement of any phase of the development.
12.9	Matter 63 PRoW Network: [APP-160] the Outline PRoW Management Plan refers to the creation of (new) permissive bridleways and improvements to the existing routes, however no detailed route plans, specifications, or proposals have been provided (a requirement as requested in both the Scoping and PEIR response – see above). The Council therefore requires the Applicant to submit supporting material in order for the Council to assess the mitigation of harm and assess proposed enhancement that collectively address the impact of the Scheme on the PRoW network. At a detailed level, the Council would request that the Scheme (provisional, subject to further discussion): a) Create a surfaced link from Footpath (FP) 8A Staploe to FP A9 Wyboston including all necessary structures to provide cycling/walking access to Alpha Park Eaton Socon; b) Create a surfaced link from FP 8A Staploe to FP 24 Staploe to provide cycling/walking access to connect communities to Eaton Socon; c) Create a surfaced link to FP 8A Staploe including all necessary structures to provide cycling/walking access to Bushmead Road to connect communities to Eaton Socon;	The permissive access proposed to be delivered by the Scheme is now more clearly set out in Table 2 of the **oLEMP [REP1-040]**. The Applicant has reviewed these requests from BBC and has discussed them with the affected landowners, noting the Applicant must get agreement from landowners as, for the majority of the Scheme, the Applicant is not utilising compulsory acquisition powers. The Applicant's position is that whilst these requests would constitute potential further enhancements the Scheme could deliver, they are not essential mitigation necessary to deliver the Scheme. The Applicant's response to the requests is set out below: a) This proposed route is outside of land that is in the Applicant's control. b) This proposed route is on land that is outside of the Applicant's control. c) This proposed route is on land that is outside of the Applicant's control. d) This proposed route is on land that is outside of the Applicant's control. e) This proposed route is on land that is outside of the Applicant's control. f) This proposed route is on land that is outside of the Applicant's control. g) The Applicant has continued to engage with landowners on this matter and can confirm that agreement has been reached to provide permissive equestrian access between the B660 and Green End, Little Staughton. This is identified in

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	d) Create a surfaced link to FP24 and FP 8A Staploe including all necessary structures to provide cycling/walking access to Bushmead Road Staploe to connect communities to Eaton Socon; e) Create a surfaced link from BW 31 and BW 44 Staploe to BW 43 Staploe including all necessary structures to provide access to the Kimbolton Road, High Street Hail Weston; f) FP 16 is a cross-field route – it would bring benefit to the landowner to move the route to field edge; g) Upgrade to width and surfacing of routes FP36, part of FP13, part of FP47 Bolnhurst and Keysoe and FP 8 Little Staughton to provide cycling/walking routes to improve and increase accessibility to the countryside and connect villages; h) Alternatively divert part of FP47 and FP8 which are extant tracks; i) Create of a surfaced cycling/walking route from Little Staughton Road C5 to FP 1 Little Staughton to road known as C11 Green End to improve and increase accessibility to the countryside and connect villages; j) Upgrade to width and surfacing of FP3 and FP4 Little Staughton to provide cycling/walking routes to connect villages; k) Provide an alternative route across the brook for part of FP11 and FP 2D Pertenhall to connect to FP 2B Pertenhall, including all necessary structures; l) Provide an extinguishment order for part of FP 2E; m) If the permanent vehicle use of PROWs as proposed is approved, provide separate routes for cycling/walking adjacent to the public rights of ways affected – inter alia BW26 & FP29 Pertenhall, BW 37 Bolnhurst and Keysoe, and FP4 Little Staughton; n) Create a surfaced footpath connection from FP29 to Green End Pertenhall; and,	Table 2 of the **oLEMP [REP1-040]** as Permissive Path 1 and shown on the Illustrative Landscape Proposals drawing at Appendix A of the oLEMP. h) The Applicant is not proposing to divert this route. i) The Applicant is consulting with the landowner but is not currently proposing to provide this permissive access. j) The Applicant is not proposing to amend the width or surfacing of this route, which partly lies outside of the Order Limits. k) This proposed route is on land that is outside of the Applicant's control. l) The requested extinguishment order is for a PRoW outside of the Order limits. The Applicant is not able to stop up this PRoW. m) The Applicant's proposed approach to managing traffic along these PRoW during the construction phase is set out in the **oLEMP [REP1-040]**. n) The Applicant notes that this suggested route is an existing surfaced track. The Applicant understands this route is not currently formally designated on the definitive map and is consulting with the landowner but is not currently proposing to amend the definitive map in this location. o) The Applicant is not proposing to provide further multi-user routes around the perimeter of Site B.

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	o) Create multi-user routes around Scheme Site B. Note that the Council are preparing plans to illustrate the above proposals which will be submitted to the Examination for discussion. It is noted that the above PRoW network proposals would address the requirements of the Council's Local Plan Policy 91 (Access to the countryside), AD36 (Pedestrian Routes), and AD39 (Cycling), the Council's Rights of Way Improvement Plan 2025-2030 (adopted), and NPPF (2024) para96 and 105.	
12.10	Matter 64 PRoW general requirements: any proposals submitted by the Applicant, in accordance with planning policy requirements, would need to demonstrate that the Scheme: a) Creates locally agreed enhance and/or additional PRoW to provide links and increased opportunities for public enjoyment (pedestrians, cyclists and horse-riders); b) Creates strategy routes and additional links for cycling/walking to enhance connectivity between parishes and across Local Authority boundaries to access national cycle routes to promote active and sustainable travel and upgrade of identified Footpaths to provide links; c) Creates spacious provision/ width corridors to existing PROW within the Scheme to improve feelings of wellbeing for the community and users; d) Creates mitigation/ enhancement landscaping strategy/plans to promote and provide interaction for cycling/walking with nature to improve the sense of wellbeing; e) Where a PRoW is to be enclosed between fences, walls or hedges, extra land will have to be set aside for the PRoW, to enable access for maintenance of the routes, to ensure that any boundary vegetation remains clear of the PRoW; f) Where the boundary treatment is a hedge, line of bushes or trees the vegetation will grow into the space around it during the growing season and has the potential to obstruct the PRoW.	The Applicant notes the Council's requirements for existing PRoW and for the creation of permissive paths. The detailed specifications sought (including route alignments, widths, surfacing, signage and waymarking, and the programme and arrangements for ongoing maintenance and vegetation management) will be provided through the final PRoW Management Plan and the final LEMP submitted for approval in accordance with Requirements 11 and 4 of the **draft DCO [REP1-005]**

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	Acute changes of direction in an enclosed PRoW should be avoided so that no intimidating blind spots are created: i. A detailed plan of ongoing maintenance programmes for the surfacing, side growth and seasonal vegetation clearances to prevent encroachment of the PRoW. ii. Adequate width provision for users - Footpaths at 4m and green Bridleways at 8m to mitigate the enclosed nature of routes and to avoid vegetation growth into the line of the PRoW during the growing season. g) Enhanced surfacing for routes within the Scheme - crossfall or a cambered profile should be provided on all PRoW and cycling/walking routes to assist with drainage. The degree of crossfall or slope should be in the range of 2% to 2.5% depending on the users of the facility and whether it has a sealed or unsealed surface; h) Demonstrates design compliance with local and national guidance; namely: i. BS8300-1:2018 Design of an accessible and inclusive built environment Part 1: External environment — Code of practice. ii. LTN 1/20 Cycle Infrastructure Design. iii. British Horse Society – advice on width, area and height on routes used with horses. iv. Plans must detail widths, surfacing material, and soft landscaping to the PRoW corridor. v. Information boards and positioning of detailed waymarking. Details regarding legal status designations for realignment and/or upgrades to existing routes; namely: i. Details regarding legal status designations for realignment and/or upgrades to existing routes; namely:	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	i. Details of additionally created cycling/walking routes and nature of their designation (permitted/ designated PRoWs); ii. Detailed timescales for the length of proposed closures and reinstatement works on affected routes; iii. Detailed timescales to be provided for permissive routes and the legal status attributed to routes; iv. The Council will require the Applicant to enter into and sign appropriate legal agreements for all affected routes; v. Details of the legal status of routes, during and post restoration; and, vi. Timescales for restoration	
12.11	Matter 65 Permissive paths: it is accepted that the creation of permissive paths will create additional opportunities for recreational access. However, it is considered that this will only be a temporary benefit as following decommissioning any permissive paths could/would be removed and the land returned to the landowner ([APP-031] para3.6.3 and 4.9.3 refer). The level of benefit should therefore be clarified by the Applicant.	The Applicant acknowledges that permissive access rights are not as beneficial as permanent access rights and, accordingly, considers the matter should only be afforded limited positive weight in the planning balance (as per Table 3 of the **Planning Statement [APP-031]**).
12.12	Matter 66 DCO Agreement: the Council has reviewed [App-016] DCO Schedule 4 (Street and PRoW Works), Schedule 6 Part 1 (Temp restriction streets and PRoW) and Part 2 (Permanent use of vehicle on PRoW), and, Schedule 7 Part 1 (Permanent Access) and Part 2 (Temp Access) and note that significant clarification and supporting material, as set out above, is required. As currently submitted, the [APP-016] Draft DCO with reference to PRoW matters is NOT supported.	The Applicant has provided responses to these matters in the rows above and has made amendments to the **oPRoWMP [REP1-042]** and **oLEMP [REP1-040]** in response to BBC's comments. The Applicant is, therefore, confident that these matters can be resolved to the satisfaction of the Council. They will continue to consult with BBC on a Statement of Common Ground.
12.13	It is noted that PRoW matters, as set out above, have not been addressed, or the Applicant has not submitted sufficient supporting material for the Council to assess these matters. It is suggested that all matters raised above regarding PRoWs are addressed as a single	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Aspect with related matters and/or issues as identified. The Council views this as a significant aspect for discussion at Examination.	
12.14	**Public Rights of Way - Matters 57 to 66 (LIR):** - as identified and assessed: **Impact: All Phase** a) Positive: Enhancements to the existing PRoWs routes and the provision of 'permissive routes' has the potential to deliver the most significant, long-term impact/ benefit arising from this Proposed Development and would address national objectives of well-being and local to sub-regional objectives of delivering access to the countryside for walking, disabled access, cycling and horse riding. The enhancement and delivery of new routes would create a network of routes across this extensive area and could be viewed as the legacy of this Proposed Development. b) **Neutral:** no neutral public right of way impacts arising from the Proposed Development have been identified. c) **Negative:** considerable potential negative impacts have been identified including restricted access, damage to the route (surface and landscape 'frame'), public safety, safety to horses, and, long-term loss of permissive routes once again creating a fragmented network. **Mitigation: All Phase** a) Clarification is required regarding: i. Matter 57: define widths of public rights of way and permissive corridors. ii. Matter 58: movement of staff (Operational Phase) and potential route on PRoW. iii. Matter 59: DCO Agreement definition and clarification of terms and Provisions.	Paragraph 2.14 of the Council's LIR refers to the position set out in Matters 57-66 above. The Applicant has already addressed each point individually and are not proposing to repeat those comments again. In terms of the request for a s.106 agreement and Archaeology Monitoring Fee from the Applicant, this is not agreed, please refer to the Applicant's response to 'Matter 14' which addresses these points in detail.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	iv. Matter 60: use of PRoW for construction traffic (all phases). v. Matter 61: maintenance of PRoW landscape 'frame', maintenance, and reinstatement of damage. vi. Matter 62: specifications and Management Plan [APP-160]. vii. Matter 63: PRoW network and Policy 91, AD36, AD39 etal (it should be noted that the Council are currently preparing mapping with the other two Host Authorities to illustrated the potential PRoW network that this Proposed Development may be able to enable/ deliver. This will be issued as part of the Council's evidence to Examination). viii. Matter 64: compliance with the Council's planning policy. ix. Matter 65: Permissive Paths x. Matter 66: DCO Agreement Schedules b) It is suggested that the Applicant tables a comprehensive strategy regarding PRoW, namely: affected routes, potential vehicle routes, potential changes to the physical nature of routes (e.g. surface treatments), damage to landscape adjacent to routes if used by construction vehicles, programme of applying for licenses, etc. – and to be discussed and agreed with the Council. c) Where works are required within/ across PRoW, the Applicant will need to seek prior notice to commencement of development to be submitted to and approved by the Council. d) Further, during the construction activity (all phases), replacement, temporary closures, etc. may be required that may affect PRoWs. The Applicant will need to seek prior notice. e) It is noted that some of this intent is presented by the Applicant across various documents, this should rather be consolidated into the [APP_160] Public Rights of Way Management Plan including measures of monitoring, enforcement, and funding of the Council to monitor the Plan. **Contractual (all Phases):**	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	a) To be secured through the DCO Agreement and relevant Management Plan: – potential long-term positive impact (caveated regarding the strategy post the decommissioning phase). b) The Council will seek a s106 PRoW/ Highways Monitoring Fee from the Applicant for the duration of the Proposed Development to monitor the Applicant's management, maintenance, and delivery of the PRoW commitments as made by the Applicant.	
13.1	Matter 67 Decommissioning Phase: the Council noted that traffic noise and plant and machinery impacts were scoped in for the construction and operational phases (Ref. Scoping Report, 2023) (Ref. Planning Inspector's Scoping Opinion ID3.6.1, ID3.6.3). The Council suggest that [APP-046] ES Noise and Vibration should either have addressed the operational (replacement) phase as a phase requiring assessment, or stated that similar consideration and mitigation measures should be put in place during this phase as proposed in the construction phase. This is not recognised by the Applicant; consequently; **Matter 67 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** traffic noise and plant and machinery noise impact as arising in the replacement and decommissioning phase should be assessed and mitigation proposed as required (it is insufficient to state that this would be less than the construction phase as this does not create a benchmark enforcement position). d) **Contractual:** to be secured through the relevant Management Plan: – neutral impact.	In relation to decommissioning, **ES Vol 1 Chapter 10 Noise and Vibration [APP-046]** sets out that, when decommissioning occurs, it is reasonable to assume that similar techniques and mitigation measures would be used as construction, and that the construction phase assessment remains a reasonable proxy for decommissioning, with effects expected to be equivalent or less than construction, with mitigation provided through the **outline Decommissioning Environmental Management Plan (oDEMP) [REP-038]**. Paragraph 1.3.1 of the **oDEMP [REP-038]** identifies that the final DEMP will sit alongside specific decommissioning phase management plans including a Decommissioning Traffic Management Plan and a Decommissioning Noise Management Plan. The measures to manage decommissioning noise at noise sensitive receptors are set out in Table 5.6 of the **oDEMP [REP-038]**. In relation to the Council's point on operational noise from replacements, mitigation measures are set out in Table 5.6 of the **outline Operational Environmental Management Plan (oOEMP) [REP-036]** that would apply throughout the operational phase, including for any replacements. Furthermore, Paragraph 2.4.10 of the **oOEMP [REP-038]** provides that, before any replacement activity involving more than 20% of the solar panels, a notification must be submitted to the relevant council for approval, setting out management measures that are consistent with the principles of the approved

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		construction phase management plans, but proportionate to the scale of the proposed replacement activity. In addition, as set out in the Applicant's response to Matters 2 and 3 of BBC's LIR, the Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken, and is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects of a major replacement campaign, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to examination Deadline 3. The Applicant is satisfied that the provisions set out within the relevant Management Plans, supplemented by the information in the Techncial Note are sufficient to demonstrate there would be no significant effects as a result of substantial replacement works and that appropriate provisions are in place to mitigate any effect in such a scenario. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.
13.2	Matter 68 Noise monitoring locations: additional detail was requested to aid assessment (Ref. PEIR Report, 2024); *'Efforts should be made to agree the position of the noise monitoring locations with the Local Planning Authorities'* (Ref. Planning Inspector's Scoping Opinion ID3.6.8).	As set out at paragraphs 10.3.4 to 10.3.6 of **ES Vol 1 Chapter 10 Noise and Vibration [APP-046]**, under the terms of an agreement between BBC, HDC and CCC, the Councils have a memorandum of understanding that the Environmental Protection Officer (EPO) at HDC could act on behalf of each Council as a 'single voice' with regards the East Park Energy project. A meeting was held with HDC's EPO in March 2024 where the proposed baseline sound monitoring and methodology and noise sensitive receptor positions were agreed on behalf of the three authorities.
13.4	Matter 69 [APP-155] Outline Construction Environmental Management Plan: in para4.1.2 the Applicant states that construction works applicable to all phases would generally be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday, with no	The Applicant notes this comment. However, they retain the commitment to the construction working hours set out in the **oCEMP [REP1-032]**.

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	construction work on Sundays or Bank Holidays. While the Council is in agreement with the proposed hours it is noted that this is a Building Regulations matter under the Control of Pollution Act (1974) and not a planning matter and such reference should be removed as a planning matter.	
13.5	Matter 70 [REP1-036] Outline Operational Environmental Management Plan: in Table 5.5 impact of noise arising from operation at noise sensitive receptors (NSR) the Council note that where complaints are received these should be investigated in accordance with the latest version of BS 4142. Noting the expected life of 40-years of the Scheme, this Standard may be replaced and/or altered and so the mitigation as identified and arising should reference 'the BS or as amended' or 'of BS 4142 or equivalent standard'.	The Applicant amended Table 5.6 of the **oOEMP [REP-036]** to reflect the same comment in BBC's Relevant Representation.
13.6	Matter 71 Standards and Regulations: the matter above regarding all Standards etc. should be read across the entire DCO Application.	The Applicant has reviewed the management plans to be secured by the **draft DCO [REP1-005]** and made updates as required to include the term "*(or any subsequent equivalent standard)*" for any standards referenced to apply to the operational and decommissioning phases. The updated Management Plans were submitted at Deadline 1 (April 7th).
13.7	Matter 72 [REP1-036] Outline Operational Environmental Management Plan: Table 5.6 Impact of noise arising from maintenance and repair activities at noise sensitive receptors (NSR). This suggests that BS5228-1:2009+A1:2014 may be applied for impact of noise arising from maintenance and repair activities. The scope of this standard applies to construction sites. If applied to ongoing normal operations this guidance is not correctly applied. In the event this part of the management plan is applicable to normal ongoing operations it should be implemented and measured against the most relevant standard, e.g. BS4142. In the event this applies	The Applicant notes that BS4142 will be used to measure and monitor noise for normal ongoing operations, as per the first row of Table 5.6 of the **oOEMP [REP-036]**. The reference to BS5228-1:2009+A1:2014 is in reference to any maintenance and repair activities that would be comparable to work undertaken during the construction phase, such as large-scale replacements.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	solely to construction related activities we agree with the standard being applied.	
13.8	**Noise and Vibration - Matters 67 to 72 (LIR):** - as identified and assessed: **a) Impact: All Phase** b) **Positive**: no positive noise and vibration impacts arising from the Proposed Development have been identified. c) **Neutral:** according to BS4142: 2014+A1:2019, the rating level relative to the assessment baseline noise would indicate a negligible to slight adverse impact magnitude at all receptors. The operational noise impacts from the Proposed Development are therefore considered to represent a neutral to minor level of effect in terms of EIA and therefore would not be significant. d) **Negative**: i. Potential negative impacts have been identified but it is suggested that these against the Matters raised above can be addressed and/or mitigated. ii. Matter 67: as set out. iii. Matters 68 to 72: clarification statement sought from Applicant. **Mitigation - All Phase:** a) Clarification statement sought from Applicant. b) The Applicant's submitted material has been reviewed and subject to the resolution of the matters above, the Environmental Statement regarding this aspect is found acceptable. The Council has no further comment to make at this time. **Contractual (all Phase):** to be secured through the relevant Management Plan(s): – neutral impact.	The Applicant has sought to provide the clarification the Council is seeking in their response to paragraphs 13.1-13.8 above. They also welcome confirmation from the Council that (subject to providing the necessary clarifications) they have no further comment to make on the topic of Noise and vibration at this time. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
14.1	BESS Fire: Notwithstanding the comment made by the Applicant regarding *'very low potential for significant environmental effect on air quality to occur in the operational phase'* it is specifically noted that, while BESS fires are rare, should they occur they can have a significant effect on the public health of the surrounding community in terms of release of toxic fumes into the air for a prolonged period of time; and, that if contaminated firewater is not managed on-site this could affect receiving water courses and groundwater to the long-term detriment of the environmental. It is therefore noted that this low probability/ significant effect should be addressed in the Applicant's submission (Ref. PEIR Report, 2024) (also refer to the Planning Inspector's Scoping Opinion ID3.10.5 Cumulative effects – operation and decommissioning). It is noted that the Applicant has addressed this PEIR matter in part in [APP-162] Outline Battery Safety Management Plan. However, some matters remain which are raised below.	The Applicant has assessed the risk of BESS fires within Section 16.4 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]**. That assessment is supported by atmospheric dispersion modelling (presented in Appendix A of the **oBSMP [APP-162]**) to consider potential effects on human health from a BESS fire and concludes that, having regard to the distance to the nearest locations of human exposure and the anticipated short-term nature of such an incident, there would be no significant air quality effects from a BESS fire incident. In relation to firewater and the protection of watercourses and groundwater, paragraph 16.4.15 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]** explains that, consistent with NFCC guidance, the BESS compound would be designed with an impermeable surface so that any run-off can be directed to a retention basin, and that in the event of a fire an automatic sluice would be operated to isolate the basin and prevent run-off leaving the Site so that it can be collected and treated appropriately. This approach is reflected in the **draft DCO [REP1-005]** description of Work No. 6B, which includes a surface water retention basin, together with an isolation valve and control systems. The **oSWMP [REP1-046]** provides further detail on this containment strategy, confirming that the impermeable BESS and substation compound would direct run-off to the retention lagoon, and that an actuated sluice gate integrated with the BESS fire detection system is proposed to isolate the lagoon and prevent contaminated run-off leaving the Site, enabling contaminated run-off to be contained for appropriate collection and treatment. Paragraph 4.5.7 of the **oBSMP [APP-162]** sets out how this is to be managed in an incident scenario. It confirms as a safety objective that firewater run-off is to be contained and tested before release or, if necessary, removed by tanker and treated offsite.
14.3	Matter 73 [APP-047] Air Quality: it is acknowledged that due to the nature of the Scheme no emissions that may impact local air quality are anticipated from the on-site infrastructure. Further assessment of air quality impacts during the operational phase were therefore scoped out of the Environmental Statement. On this basis, the Council considers that the [APP-155] Outline CEMP includes	The Applicant notes this comment and welcomes agreement with BBC on this matter.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	appropriate dust management and monitoring measures to be employed as based on the recommendations of the IAQM guidance. It is concluded that if the DCO is granted, the Outline CEMP will be developed into a final Construction Environmental Management Plan (CEMP) once a contractor is appointed. Further, the Applicant states that a final Construction Dust Management Plan (CDMP) will be prepared as part of, or to accompany, the final CEMP, in line with guidance on dust mitigation. This CEMP will include the implementation of Best Practice Measures to control and manage dust emissions as recommended in the IAQM guidance on dust from construction. On the basis that the CEMP and CDMP will be submitted to the Council's Environmental Health Officer for approval prior to construction, this matter is acceptable.	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
14.4	Matter 74 Dust mitigation: [REP1-036] oOEMP Table 5.7 - impact of dust arising from activities on the site, and movement of vehicles within and outside the site: the Council seek further clarification of mitigation measures, include timetabling of earthworks that avoid activities taking place during dry months (i.e. mitigations measures regarding reduced water use or the use of non-potable water to control dust or the use of water suppression may need to be restricted or tightly controlled). Local contextual understanding notes that local geology may indicate the presence of Northampton sand resulting in very fine material being re/suspended which could be carried off-site and effect local amenity. Where earthworks are very limited the impact may be negligible, but the Council seeks a strategy for dust disamenity control to address this concern.	The **oOEMP [REP1-036]** relates to measures to be employed during the operational phase. As noted above the Scheme is unlikely to result in significant air quality effects as the operational components of the Scheme do not generate dust emissions. As best practice however the **oOEMP [REP1-036]** includes standard measures to mitigate the potential for any dust generation from vehicle movements and other activities that may be undertaken on site during the operational phase. The Applicant notes that Table 5.7 of the **oOEMP [REP1-036]** confirms that operational dust would be managed through IAQM-derived best practice, including (where appropriate) suppression using non-potable water, wet cleaning methods, maintenance of access routes and a 20mph internal speed limit. Matters in relation to earthworks and internal haulage during the construction phase are dealt with in the **oCEMP [REP1-032]**. The Applicant agrees that the principal potential for dust disamenity would arise during construction earthworks and trackout, and this is addressed through the outline Construction Dust Management and Monitoring Plan (oCDMMP) within Appendix A of the **oCEMP [REP1-032]**. The oCDMMP sets out both preventative measures (including minimising exposed areas, rapid stabilisation of earthworks and trackout controls) and an overriding requirement that any activity causing visible dust emissions towards sensitive boundaries will be modified, reduced or suspended until effective remedial action is in place or conditions moderate. Daily visual inspections are proposed, with careful consideration during continuous dry and windy periods, and provides for escalation (including cessation of activities) if dust is observed towards or beyond the site boundary. Quantitative dust monitoring is also secured, including baseline monitoring for at least three months (capturing at least three summer months, April to September), followed by monthly reporting to the council and a 12-month review of the monitoring regime.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Matters 73 and 74 (LIR): - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** clarification is sought from the Applicant that mitigation measures put in place by the Applicant regarding air quantity for the Construction Phase will also be addressed for the Replacement Phase and the Decommissioning Phase within related management plans. d) **Contractual:** to be secured through the relevant Management Plan(s): – neutral impact.	As set out in response to Matters 2 and 3 of the BBC LIR, the Applicant recognises there is some uncertainty amongst stakeholders about how any large-scale replacement panel or batteries during the operational phase will be undertaken. They are currently in the process of preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3. In terms of the Decommissioning phase, air quality effects would be mitigated primarily through a range of measures secured via the final DEMP, together with a range of standard mitigation measures which would be updated to reflect the prevailing practice at the time decommissioning is carried out. This includes: • Preparation of a **Decommissioning Dust Management Plan (DDMP)** as part of, or to accompany, the **final DEMP**. • Inclusion of **IAQM-based best practice measures** in the final DEMP to control and manage dust during decommissioning. • Controls on **exhaust emissions**: all **NRMM and decommissioning vehicles** to comply with prevailing emissions standards at the time of decommissioning, with compliance checks. • A **monitoring framework** to be set out in the final DEMP, including regular recording of compliance with dust measures and a scheme of **quantitative dust monitoring** to be developed and agreed with appropriate stakeholders. The Applicant is satisfied that the provisions set out within the relevant Management Plans, supplemented by the information in the Techncial Note are sufficient to demonstrate there would be no significant effects on air quality as a result of substantial replacement works during the operational and decommissioning phases, and that appropriate provisions are in place to mitigate any effects.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral.
14.5	In review: the Applicant's submitted material has been reviewed and subject to the resolution of the matters above, the Environmental Statement regarding this aspect is found acceptable. The Council has no further comment to make at this time.	The Applicant has sought to provide the clarification the Council is seeking in their response to paragraph 14.1-14.4 above. The Applicant welcomes confirmation from the Council that (subject to providing the necessary clarifications) the Council has no further comment to make on the topic of Noise and vibration at this time.
15.1	Matter 75 Pollution leaching: with regards to onsite maintenance and management of chemicals and leaching into the soil and/or groundwater (e.g. chemical spills/cleaning materials to PV units; '*Pollutant-receptor-linkages and the siting of compounds and any fuels will need to be kept well away from the banks of any stream and other watercourses*'), the Applicant had proposed that (para9.5.26) *'… the impact of chemical pollution during the operational stage is proposed to be scoped out*'. While it is acknowledged that the Inspector *'considers that the presence of chemicals and soil disturbance during operation, including maintenance procedures, is unlikely to give rise to significant effects… The ES should explain why the operation of the Proposed Development would not give rise to routine emissions of chemicals (i.e. that panels are effectively inert) or sediment and how emergency releases would be managed within an Operation Environment Management Plan and/ or Soil Management Plan and Battery Safety Management Plan'*. (Planning Inspector's Scoping Opinion ID3.3.2; further ID3.4.4, ID3.4.5 regarding operational and decommissioning phases). In [APP-048] Ground Conditions para12.7.3 the above issue/ risk has been identified and is drawn through to the [REP1-036, 158] Outline	The Applicant disagrees that the **Environmental Incident Management and Pollution Prevention Plan (EIMP)** should be submitted in outline at Examination and maintains that submission should be in tandem with the final OEMP, post DCO consent**.** This is because: ▪ planned soil disturbance will be minimal during operation. ▪ No point sources of contamination (such as tanks, chemical stores and such like) were recorded across the scheme area during either the walkover or detailed historical review. ▪ The siting of the BESS, the control compound and East Park electrical substation are within areas that are away from the locations of former ponds and from alluvial or other organic materials. ▪ A suitable development stand-off would be applied to the abandoned oil pipeline which runs through the site. ▪ The presence and usage of fuels and chemicals during operation, including maintenance procedures, is also unlikely to give rise to significant effects. Section 12.7.2 of **ES Vol 1 Chapter 12 Ground Conditions [APP-052]** and Table 5.8 of the **oOEMP [REP1-036]** states how routine emissions and potential sources of pollution will be suitably mitigated during the operation of the development and how surface water drainage strategy will ensure drainage measures prevent erosion and protect soil structure.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Operational Environmental Management Plan Table 5.8. However, the Applicant's references that this will be addressed in an 'Environmental Incident Management and Pollution Prevention Plan' which has not been submitted as part of the DCO Application. This raises some concern and should in submitted in outline at Examination. Address of this matter therefore remains a material consideration. **Matter 75 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. The Council expressed significant concern regarding the possibility of soil and groundwater pollution arising during the 40-year operational stage, and suggested that the matter should be assessed (including the need to include any mitigation measures as part of a CEMP) (Ref. Scoping Report, 2023). ii. The Applicant to address this matter and mitigation measures through their stated 'Environmental Incident Management and Pollution Prevention Plan' which has yet to be submitted as part of the DCO Application. It is suggested that this Plan sits within the Construction Environmental Management Plans for each phase. d) **Contractual:** to be secured through the relevant Management Plan(s): – neutral impact.	Contaminants being encountered through ground disturbance during the operation will therefore also not give rise to significant effects. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that the effect would be neutral. and this has been reflected in the **draft DCO [REP1-005]** and cited control documents.
15.2	BESS facility Major Accidents or Disasters (Applicant Scoping para18.3.11): *'The battery units have the potential to generate heat and therefore there is a risk of a fire developing'*. The Council noted that the BESS is a battery unit and consequently there would need to be an assessment in the case of fire and then associated possible	The Applicant notes this comment and welcomes confirmation from BBC that this issue has been addressed.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	ground and soil contamination/ hazardous pollution (Ref. Scoping Report, 2023) (Planning Inspector's Scoping Opinion ID3.4.3). It is suggested that this concern and Scoping matter has been addressed by the Applicant in [APP-162] Outline Battery Safety Management Plan	It is also relevant to note that the Applicant has also agreed a Statement of Common Ground (SoCG) with the CFRS regarding the Scheme including the details set out in the **oBSMP [APP-162].**
15.3	Matter 76 BESS Firewater: **Matter 76 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising **significant environmental and human health** negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. It is noted that the management and removal of contaminated firewater needs specific address in any Operational Environmental Management Plan including an emergency strategy should such firewater breach into river catchment areas and/or leach into ground water or soils (Ref. PEIR Report, 2024) (Planning Inspector's Scoping Opinion ID3.4.3, ID3.12.2). It is suggested that this concern and Scoping matter has been addressed in part by the Applicant in [APP-162] Outline Battery Safety Management Plan. However, the matter of breach needs address. ii. How any breach or harm is to be reported (specifically Applicant contact points should such emergencies arise out-of-hours), including review/ enforcement/ recourse by the Council and Environment Agencies including address of financial penalties, should be clearly set-out in the Management Plan. iii. Long-term clean-up and monitoring measures, should a breach occur, should be clearly set-out in the Management Plan.	In relation to firewater and the protection of watercourses and groundwater, paragraph 16.4.15 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]** explains that, consistent with NFCC guidance, the BESS compound would be designed with an impermeable surface so that any run-off can be directed to a retention basin and that, in the event of a fire, an automatic sluice would be operated to isolate the basin and prevent run-off leaving the Site so that it can be collected and treated appropriately. This approach is reflected in the **draft DCO [REP1-005]** description of Work No. 6B, which includes a surface water retention basin together with an isolation valve and control systems. The **outline Surface Water Management Plan (oSWMP) [REP1-046]** provides further detail on this containment strategy, confirming that the impermeable BESS and substation compound would direct run-off to the retention lagoon, and that an actuated sluice gate integrated with the BESS fire detection system is proposed to isolate the lagoon and prevent contaminated run-off leaving the Site, enabling contaminated run-off to be contained for appropriate collection and treatment. Paragraph 4.5.7 of the **oBSMP [APP-162]** sets out how this is to be managed in an incident scenario. It confirms as a safety objective that firewater run-off is to be contained and tested before release, or, if necessary, removed by tanker and treated offsite. In terms of capacity, the Apploicant's drainage engineers confirmed in the Applicant's response to Relevant Representations **[REP1-055]** that the headroom capacity within the firewater collection system above the firewater volume is calculated as 1,448m^3, which is larger than the volume needed to manage the 30-year + Climate change return period storm event. The risk of exceedance of the system, i.e. coincidence of a fire event with a greater than 30-

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	iv. In outline, the Applicant should table where and how the contaminated firewater is to be handled to ensure that such potential harm is not now arising off-site. v. The Applicant states in para4.5.6 that the capacity of the surface water drainage system to contain firewater runoff has been calculated to 'accommodate a reasonable worst-case scenario'. However, no volumetric calculations that are then evidenced in firewater/ stormwater ponds layout/design/ capacity have been evidenced to confirm this matter. The Council view this as a significant potential environmental risk. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term risk leading to negative impact.	year + CC storm, is negligible and in the view of the Applicant, the risk of breach does not therefore merit further assessment. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s). However, based upon the information presented above it is not considered there would be potential for a long-term risk leading to negative impact.
15.4	*NFCC Guidance*: National Fire Chiefs Council's 'Grid Scale Battery Energy Storage Systems planning – Guidance for Fire and Rescue Services' (November 2022; Version 1) is not adopted planning policy and carries no weight in determination. In light of a nearly total lack of planning policy with regards to BESS fire safety management, it is suggested that the strategy/ approach raised in the Guidance is adopted within any strategy that they propose (Ref. PEIR Report, 2024). It is noted that this document is referenced in the [APP-162] Outline Battery Safety Management Plan which addresses this PEIR matter.	The Applicant notes this comment and welcomes confirmation from BBC that this issue has been addressed. The **oBSMP [APP-162]** has been prepared with due regard to the NFCC guidance.
15.5	Matter 77 Insurances: while not a direct planning matter, BESS fire risk, and related insurance, should be stated as solely the responsibility of the Applicant/ Promotor for the duration of the Scheme including the decommissioning stage (Ref. PEIR Report, 2024). **Matter 77 (LIR):** - as identified and assessed: clarification sought from the Applicant.	The Applicant notes this comment and acknowledges that responsibility for fire risk and any insurance for the BESS would be the responsibility of the Site Operator. As stated by the Council, this is not a planning matter.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
15.6	Matter 78 Waste: (Applicant Scoping para18.4.9) the materials used within both the BESS battery units, PV panels and cabling have not been stated and therefore, to err on caution, the Council would need to understand the life-cycle management of and possible long-term contamination/ waste disposal of these materials; and, (Applicant Scoping para18.4.6) *'In relation to [replacement and] decommissioning, waste arisings will be generated from the removal of PV panels, PV mounting structures, cabling, electrical equipment, fencing and foundations'*, and similarly in relation to the BESS battery facility. The Council would like to see detailed aspects related to waste management of the total Scheme scoped in (Ref. Scoping Report, 2023) (Planning Inspector's Scoping Opinion ID3.12.3, ID3.12.5). [APP-038] The Scheme – the Applicant states that there would be a need to replace components that fail or reach the end of their lifespan over the operational lifetime of the project. Table 2-35 identifies anticipated timescales for each component. The Applicant states that *'the replacement of components would be periodic throughout the lifetime of the scheme and would not involve the intensity of construction at the outset of the project'*. However, para 2.6.3 references the potential for significant replacement campaigns including large-scale replacement of solar PV array areas, or multiple transformer or battery storage units. In these instances, more staff and specialist equipment (cranes and low loaders) would be required. This matter has, however, not been fully resolved and / or assessed by the Applicant nor discussed and resolved with the Council – this matter raises significant concern **Matter 78 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising **significant environmental and human health** negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures**:	The Applicant acknowledges that, over a 40-year operational lifetime, some components will require replacement and that, on occasions, this could comprise significant replacement campaigns (for example, large-scale replacement of solar PV array areas, or multiple transformers or battery storage units). This is expressly recognised at paragraph 2.6.3 and Table 2-35 of **ES Vol 1 Chapter 2 The Scheme [APP-038]**. Table 2-35 of **ES Vol 1 Chapter 2 The Scheme [APP-038]** sets out assumptions on the operational lifespan for key components, including solar panels and battery storage units. Paragraph 2.6.6 notes that replacement would be periodic through the lifetime of the Scheme and would not involve the intensity of the initial construction phase. However, paragraph 2.6.3 explains that, where 'significant replacement campaigns' are required then there is the potential for more staff and specialist equipment to be required. Paragraph 2.4.8 of the **oOEMP [REP1-036]** confirms that routine inspections and assessments will be undertaken to determine the condition and performance of solar panels, solar balance of plant and battery storage units, and that equipment reaching the end of its functional lifespan or showing reduced performance will be scheduled for replacement. Paragraph 2.4.9 then explains that large scale replacement activities will not form part of routine operation and that potential impacts, including to highways, will be limited and can be controlled predominantly through the measures in the oOEMP. Paragraph 2.4.10 of the oOEMP **[REP1-036]** provides that, before any replacement activity involving more than 20% of the solar panels, a notification must be submitted to the relevant council for approval, setting out management measures that are consistent with the principles of the approved construction phase management plans, but proportionate to the scale of the proposed replacement activity. Further to the above and as set out in detail in the Applicant's response to Matters 2 and 3 of BBC's LIR, the applicant will be submitting a Technical Note

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	i. It is suggested that the potential harm and severity of harm resulting from the materials used in the Proposed Development in terms of life-cycle recycling and carbon footprint, also with the potential to export such waste to land-fill, needs to be more comprehensively addressed within the Environmental Statement than currently stated by the Applicant. The Council's position is supported by the Supreme Court Ruling R (Finch) v Surrey County Council and others [2024] UKSC20, 20 June 2024 regarding assessing 'downstream' impacts and effect. ii. To be cross-referenced with Matter 4. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential to remain a long-term risk leading to negative impact.	at Deadline 3, which specifically assesses the environmental effects of significant replacement campaign. Turing to the matter of waste management, Section 16.3 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]** provides a waste assessment that covers the construction, operational and decommissioning phases of the Scheme and identifies the likely waste streams arising as well as whether they could give rise to significant environmental effects. This includes for potential replacements during the operational phase. The **oWMP [APP-164]** provides estimated decommissioning waste arisings and assumed fates, including high levels of recycling for PV modules, mounting structures, transformers and battery units. Waste arising from operational maintenance and replacements is also addressed in the **oWMP [APP-164]** and **oOEMP [REP1-036]**, including commitments that any solar panels requiring replacement will be sent to specialist PV recycling facilities and that BESS will be refurbished, repurposed or recycled where feasible, with corresponding decommissioning commitments set out in the **oDEMP [REP1-038]**. In this regard the Applicant notes the commentary by the Secretary of State when determining the East Yorkshire Solar Farm DCO (ExA report ref 3.13.50 and 3.13.51) where they state that although the capacity of facilities to handle decommissioned solar PV panels are still developing, the recycling industry is likely to respond to demand over time. On climate change, lifecycle greenhouse gas emissions have been assessed in **ES Vol 1 Chapter 15 Climate Change [APP-051]** and **ES Vol 2 Appendix 15-1 [APP-116]**. The scope of the greenhouse gas assessment includes embodied emissions from raw material extraction and manufacturing, transport of equipment and materials, and operational emissions including energy consumption, material and waste generation from ongoing site maintenance. As per paragraph 2.2.9 of **ES Vol 2 Appendix 15-1 [APP-116]**, the lifecycle and

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		replacement of equipment has been factored into the greenhouse gas assessment. The Applicant therefore considers that significant replacement campaigns have been assessed with controls in place through the framework of environmental management plans, and that lifecycle recycling, waste management and carbon considerations are also assessed in the ES with controls in place similarly through the framework of environmental management plans. Finally in relation to the Council's comments on '*Finch*', the Applicant has provided a statement on the potential indirect effects of the Scheme at Section 4.4 of **ES Vol 1 Chapter 4 EIA Methodology [APP-040]**. The Applicant is satisfied that any potentially significant indirect effects of the Scheme have been assessed through the ES. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s). However, based upon the information presented above, it is not considered there would be potential for a long-term risk leading to negative impact.
15.8	Matter 79 Watching brief: the Council is in broad agreement with the conclusions and recommendations of [APP-048] Ground Condition report; however: **Matter 79 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. It is recommended that a watching brief be put in place. This would review and monitor any unexpected contamination originating from the Proposed Development or the migration	The Applicant welcomes the Council's broad agreement with the conclusions and recommendations of **ES Vol 1 Chapter 12 Ground Conditions [APP-048]**. Section 4.1.19 of the **oCEMP [REP1-032]** states: "*A watching brief shall be maintained and documented for unexpected land contamination in accordance with an agreed Unexpected Contamination Protocol which will be prepared as part of, or to accompany the final CEMP. Should any unforeseen gross or widespread contamination be encountered then works will stop in the identifiable bounds of the affected area and an appropriately qualified contaminated land specialist would be contacted immediately. The specialist will attend the site, examine the potential contaminative materials (including taking samples where required or the material or soil), and provide advice as to required actions (if any). Records will be kept of this investigation, and these will be communicated to the relevant council.*"

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	of contamination from neighbouring sites, to be dealt with in an appropriate way. ii. Should any ground and water contamination be encountered/ arise during the construction, operation, and decommissioning of the Proposed Development then works should be temporarily suspended, unless otherwise agreed in writing by the Local Planning Authority, and a Contamination Remediation Proposed Development should be submitted to (as soon as practically possible) and approved in writing by, the Local Planning Authority. The Contamination Remediation Proposed Development shall detail all measures required to render this contamination harmless and all approved measures shall subsequently be fully implemented prior to re-engagement of the Proposed Development or parts of the Proposed Development as agreed. iii. How any breach or harm is to be reported (specifically Applicant contact points should such emergencies arise out-of-hours), including review/ enforcement/ recourse by the Council and Environment Agencies including address of financial penalties, should be clearly set-out in the Management Plan. d) **Contractual:** to be secured through the relevant Management Plan(s): – potential long-term risk leading to negative impact.	Section 1.3.3 of the **oOEMP [REP1-0038]** states: "*Environmental Incident Management and Pollution Prevention Plan (EIMP): This plan will provide a structured response framework for fuel or chemical spills, unexpected contamination events, and pollution control measures to prevent impacts on watercourses and groundwater. This is considered appropriate for the operational phase where excavation is not expected.*" Table 5.8 of the **oDEMP [REP1-038]** states: "*A watching brief will be maintained by an Environmental Clerk of Works (ECoW) for unexpected contamination.*" Based upon the above it is the Applicant's position that appropriate management plans would be in place to monitor and if necessary mitigate / remediate any contamination thus it is not agreed there would be potential for a long-term risk leading to negative impact
15.9	DCO Informative 2 (Identifying Potentially Contaminated Material): it is suggested that the following informative is included within the DCO, namely – 'materials or conditions that may be encountered by the Scheme and which could indicate the presence of contamination include, but are not limited to soils that are malodorous (for example a fuel odour or solventtype odour), discoloured soils, soils containing man-made objects (for example paint cans, oil/chemical drums, vehicle or machinery parts etc., or fragments of asbestos or	The Applicant notes this comment but statutory instruments, such as a development consent order, do not include informatives. An explanation and precedent in respect of each of the provisions included in the **draft DCO [REP1-005]** is included in the **Explanatory Memorandum [REP1-007]**. The Applicant considers that this matter is covered by the requirement within the **oCEMP [REP1-032] t**o prepare an Unexpected Contamination Protocol as part of the final CEMP.

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	potentially asbestos containing materials), and, any other material that are encountered that causes doubt, or which are significantly different, then the safety and secure disposal of such materials with respect to land contamination lies solely with the Applicant/ Promoter. The above informative would be considered to be in line with paragraphs 187 (e) & (f) and 196 and 197 of the NPPF 2024. Guidance on how to assess and manage the risks from land contamination can be found here https://www.gov.uk/government/publications/landcontamination-risk-management-lcrm'. **Informative 2 (LIR):** - as identified and assessed: clarification sought from the Applicant.	
16.1	Matter 80 Soils: the Council is not in agreement with the Applicant's statements regarding the approach to protecting the quality (productivity) of agricultural soil. Soil represents a living habitat that require annual soil augmentation to remain an active ecosystems. Soil kept in partial shade and with no or limited cultivation or augmentation over a 40-years period has the potential to irreversibly harm the live-ability and productivity of that soil. The Council would want to see considerable assessment, statement, and a long-term maintenance methodology regarding this matter to support the Applicant's approach that this is temporary and that the soils can be brought back into productive agricultural use (Ref. Scoping Report, 2023) (Planning Inspector's Scoping Opinion ID3.11.1-2, ID3.11.5). While the Applicant recognises the matter of soil health, NPS EN5 requires the Applicant to 'guarantee' bringing the soil back to its baseline ALC (with ref. NPS EN5 para2.0.25 *'to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline*	The Applicant notes that BBC's comments were firstly provided at the EIA Scoping stage, and then at statutory consultation in relation to the PEIR, both of which preceded the preparation of **ES Vol 1 Chapter 13 Land and Soils [APP-049]** and the **outline Soil Management Plan (oSMP) [APP-161]**. The Applicant considers that these documents address the matters raised by BBC. The Applicant welcomes the Council's strong support for the 'Agrisolar Research Area' proposed within East Park Site D.

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	Agricultural Land Classification (ALC)'. The Applicant has submitted no such strategy. The Applicant will need to table a Soil Management Plan to ensure that the land is brought back to arable use (Ref. PEIR Report, 2024). The Council notes the intent of the Applicant to set up [APP-038] Works No. 10 'Agrisolar research area' in partnership with Rothamsted Research. This initiative is strongly supported. However, how this is enacted needs some consideration in the DCO Agreement and address in the [APP-161] Outline Soil Management Plan to address the matter above.	
16.8	Matter 81 Soil data: the Applicant's responses to Natural England's scoping opinion had outlined how continuation of data collection would be conducted. A subsequent change by the Applicant to the approach adopted a less intensive method than was originally proposed, which for the most part equated to one survey point/two hectares. However, where impacts were anticipated to be greater (BESS, on-site sub-station and compounds, and cable corridors) the standard methodology of one sample per hectare was adopted. It is indicated that the revised methodology followed further discussion with Natural England. 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). It is suggested that for completeness of this aspect, the missing data should also be available for restoration of land, upon decommissioning, to its original condition.	It is noted by the Applicant that the Council's main areas of concern regarding the soil data and assessment of BMV land relates to: • the absence of soil assessment data for land to which access was not availiable to the Applicant for assessment • firm commitments for post decommissioning ALC surveys • clarification around the fact that the assessment of the permanent loss of BMV agricultural land does not include the areas of landscape mitigation planting (woodland / hedgerows etc), which could be retained post decommissioning. In terms of the agricultural land assessment, the survey approach, including the sampling density, is set out in **ES Vol 1 Chapter 13 Land and Soils [APP-049]**, supported by **ES Vol 2 Appendix 13-1 Agricultural Land Classification and Soil Resources [APP-115]**. ES Chapter 13 explains at paragraph 13.4.6 **[APP-049]** that sampling was undertaken at a density of one survey point per two hectares across most of the Site and at one survey point per hectare in areas of potentially greater impact, including the locations of the BESS, on-site substation, construction compounds and cable corridors. As set out in paragraph 13.3.5 **[APP-049]**, following statutory consultation, the Applicant undertook further consultation with Natural

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	Matters 80 and 81 (LIR): - as identified and assessed: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR) **Impact 1: Construction Phase** a) **Positive:** no positive effects of construction are identified. b) **Neutral**: i. Neutral or negligible effects are recognized in relation to the mineral reserves, which would not be sterilised by the Proposed Development. ii. Negligible construction effects (although described as negligible adverse) are accepted as neutral and identified for each of the four soil types identified within the Proposed Development. This is based on the resilience of soil types and embedded mitigation. c) **Negative**: i. In construction, moderate adverse (significant) effects on Grade 2 agricultural land are identified. This negative effect is a consequence of taking best and most versatile (BMV) land from arable production. Where land survey information is missing, a worst-case effect is assumed, and a moderate adverse effect has been applied. ii. Subgrade 3a land is also BMV land. Its removal from arable cropping is assessed as a minor adverse (not significant) effect. Similarly, the removal of Subgrade 3b land (not BMV) from arable farming is identified as a minor adverse effect. iii. The areas of permanent and reversible effects are identified in tabulated form, differentiating between ALC grades. Permanent effects are described as BESS, substation, transformers, cabling and access tracks, even though there would be removal on decommissioning. The Council	England on the scope of the ALC survey, and explains the rationale for adopting a proportionate approach to survey density in paragraphs 13.5.1 to 13.5.2 **[APP-049]**. The Applicant agrees with BBC that the approach taken in classifying 'ungraded' agricultural land enables an assessment of the worst-case project effects, they also agree that, whilst the approach taken to classifying soils is appropriate for planning and EIA purposes, the absence of data could hinder the final detailed soil management strategy. The Applicant has therefore updated paragraph 8.1.4 of the **oSMP [REP1-0044]** to commit to undertaking further detailed soil surveys within the Order limits prior to the construction phase, including the areas that have not been the subject of assessment. In terms of Decommissioning the **oDEMP [REP1-038]** requires a Decommissioning Soil Management Plan be developed prior to decommissioning to account for prevailing site conditions in accordance with the principles set out in the **oSMP [REP1-0044]**. This would facilitate discussion and agreement about post decommissioning assessment of soils and agricultural land quality, including whether a 5 year post decommissioning window is necessary. In relation to whether or not the Applicant is proposing that the areas of proposed woody vegetation are permanent, paragraphs 7.1.2 and 7.1.3 of the **oLEMP [REP1-040]** confirm that proposed native species woodland and woodland belt planting, proposed native species hedgerow planting, and proposed native species individual tree planting would be retained at decommissioning and handed back to landowners as mature landscape features. Paragraphs 7.1.4 to 7.1.6 **[REP1-040**] set out that other elements (including proposed grazing pasture or neutral grassland and species-diverse grassland, and ecological enhancement features) would remain on site at decommissioning and their future retention would also be at the discretion of the landowners once the land is handed back and the development consent order

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	recognizes the potential for permanent diminution of land classification. iv. However, permanent effects do not include the area of landscape mitigation planting of hedgerows and trees, which are anticipated to be retained. The outline Landscape and Ecological Management Plan include approximately 19ha of native species woodland and 17.4km of native hedgerows. Whilst this does not negatively affect the soil resources, it increases the removal of BMV land from agricultural production. **Mitigation 1: Construction Phase** a) Mitigation is embedded mitigation provided by the SMP and no additional mitigation is proposed or required. b) Access to 5.4% of the Proposed Development area was not available. In the absence of data, the EIA assumed the worst-case outcome that the land is Grade 2. This enables assessment of worst-case effects of the Proposed Development. c) However, the Council considers it important that the data should be available for preparation of a detailed SMP (proposed post consent and to be substantially in accordance with the oSMP). The missing data is required for recognition of soil types, ensuring their protection, and for the segregation of soil types for short-term and long-term storage. **Impact 2: Operational Phase** a) **Positive:** a potential beneficial effect to soil resources during the operational phase is recognized resulting from the absence of cultivation of the land and maintenance of permanent vegetation cover. The application of magnitude and sensitivity criteria to the assessment to present a significant beneficial effect is likely to be overstated. The Council considers the potential beneficial effect to be minor and not significant.	terminates. At the heart of this application is the fact that this is a temporary planning consent. The Applicant notes the Council's point with regard classifying areas of woody vegetation as 'permanent adverse impact' but does not agree that these areas should be treated as 'permanent' and consequently irreversible adverse land use change for the purposes of the assessment. The Applicant's treatment of the proposed woody vegetation in the assessment is arguably no different to the areas of proposed grassland in the sense that the soil functions would not be permanently adversely affected, and the impacts are reversible in that the land could support agricultural or biomass production again in future should the habitats be removed. The methodology used in ES Vol 1 Chapter 13 Land and Soils [**APP-049**] to assess magnitude of impact distinguishes between effects that are permanent and irreversible versus those that are temporary and reversible. In this context, native woodland and hedgerows are not irreversible; they can be removed and the land can be reinstated (with soils remaining unsealed and capable of restoration) if required at decommissioning. In the above context, it is important to distinguish between the permanent adverse footprint (e.g. access tracks and hardstanding), and areas subject to land management change during operation. ES Vol 1 Chapter 13 Land and Soils **[APP-049]** is clear that the quantified permanent adverse impact to BMV land relates to the Scheme's permanent built elements, and that the remainder can be reverted, with soil resource benefits. The Applicant notes that woodland/hedgerow creation is strongly aligned with current Government direction on multi-functional land use and increasing woodland cover. Defra's Land Use Framework consultation and accompanying material explicitly promote nature and climate outcomes and encourage multi-functional land uses. The Applicant's position is that woody planting should be treated as a long-term (but reversible) land management change, but not "permanent and irreversible" land take for the land and soils receptor.

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	b) **Neutral:** following construction, the residual effect on land classification by grade is negligible and determined to be neutral. Operational effects on the mineral reserves remain neutral. c) **Negative:** no negative effects resulting from operation are identified. Negative legacy effects of construction are possible are not a direct function of operation, but nonetheless mitigation is addressed below. **Mitigation 2: Operational Phase** a) Mitigation will be provided by the SMP, which should include details of monitoring of visual indicators of unhealthy soil conditions and potential remedial action. No other mitigation is required beyond that specified in the SMP. **Impact 3: Decommissioning Phase** a) **Positive:** no positive effects of decommissioning are identified. b) **Neutral:** it is acknowledged that the effects at decommissioning would be of a broadly similar magnitude of impact to the impacts during construction. The decommissioning phase has a neutral effect on mineral reserves. c) **Negative:** whilst decommissioning effects in relation to land and soils would largely mirror those in construction the removal of components of the Proposed Development to include the East Park BESS, substation and cabling recognizes the potential for permanent negative effects to soil condition and by extension land classification. **Mitigation 3: Decommissioning Phase** a) The decommissioning activities would be completed in substantial accordance with the oSMP and outline Decommissioning Environmental Management Plan. b) The survey of missing data required pre-construction (to complete baseline data) will be required to provide restoration	The Applicant thereby stands by the conclusions of ES Vol 1 Chapter 13 Land and Soils **[APP-046]** and the approach to the assessment of this matter. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and a neutral effect

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	outcomes after decommissioning. ALC survey should follow five years after decommissioning. Remedial measures will be required in a new SMP if restoration is incomplete **Contractual (all Phases):** to be secured through the Management Plan(s): – potential long-term neutral impact.	
16.9	Matter 82 Biomass/ agricultural production: a permanent change of land use in the form of landscaping and habitats, referenced as substantially in accordance with the [REP1-040] Outline Landscape and Ecological Management Plan, includes approximately 19ha of native species woodland and 17.4km 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. **Matter 82 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. c) **Mitigation measures:** these permanent effects (yet to be confirmed as such by the Applicant) are not addressed in the presentation of residual effects, including an absence from the summary Table 13.5. The conclusion that the Proposed Development would result in a permanent adverse impact to approximately 5.86ha does not incorporate the effects of habitat creation. It is suggested that this is reviewed accordingly (subject to concluding the intent of 'permanent'). d) **Contractual:** to be secured through the relevant Management Plan(s): – neutral impact.	Please refer to the Applicant's response to paragraph 16.8 of BBC's LIR above.

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16.10	Matter 83 Assessment of residual effects: this 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 it 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 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.	The Applicant notes that Section 13.20 of **ES Vol 1 Chapter 13 Land and Soils [APP-046]** presents residual effects by receptor (as a summary in Table 13.15). The component-level breakdown for each work type against each ALC grading (sought by this comment) is already addressed through Tables 13.13 and 13.14 and the accompanying narrative at paragraphs 13.8.6 to 13.8.11. Table 13.14 breaks down permanent adverse impacts by Scheme component (Work Nos. 1, 2, 3, 4 and 6) and by ALC grade, including Grade 2 and ungraded land. Paragraph 13.8.8 explains that the total permanent adverse impact to Grade 2 and ungraded land is 1.54 hectares, which is assessed as a low magnitude impact, resulting in a Moderate Adverse effect (significant in EIA terms). Paragraph 13.8.11 further confirms that the ungraded land is assumed to be Grade 2 for the purposes of the assessment, and that the permanent adverse impact to ungraded land is 0.14 hectares (within the overall 1.54 hectares). In respect of grade 3a land, Table 13.14 identifies the total area subject to permanent adverse impact as 4.32 hectares, and paragraph 13.8.9 confirms that this equates to a low magnitude impact and a Minor Adverse effect (not significant in EIA terms). The principal sources of that permanent impact to grade 3a land are transparent in Table 13.14, which attributes 3.79 hectares of Subgrade 3a impact to Work No. 6 (including permanent access tracks and ancillary infrastructure), with smaller contributions from other Work Nos. The Applicant has responded on the creation of woody habitats and the permanent loss of BMV Agricultural Land in paragraph 16.8 above.
16.7	Matter 84 Beneficial effect: **Matters 83 and 84 (LIR):** - as identified and assessed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. The potential beneficial effect to soil resources during the operational phase, as the land would not be cultivated and permanent vegetation cover maintained, are acknowledged. The application of	The Applicant welcomes the Council's acknowledgement that the Scheme will have a beneficial effect on soil resources during the operational phase. The assessment of beneficial effects on soil resources has been undertaken based on the methodology set out in Section 13.4 of **ES Vol 1 Chapter 13 Land and Soils [APP-049]**. During operation, substantial areas of the Order limits would move from intensive arable cultivation to long-term vegetated cover (grazing pasture/neutral

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	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 Council to be minor and not significant as stated by the Applicant. **c) Mitigation measures:** i. Notwithstanding concerns over missing data and more detailed analysis of how Proposed Development 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. ii. The Applicant has submitted an Outline Soil Management Plan [APP-161] which would be developed into a detailed Soil Management Plan post-consent. 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. d) **Contractual:** to be secured through the relevant Management Plan(s): – neutral impact.	grassland and other habitats), managed through the **oLEMP [REP1-040]**, **oOEMP [REP1-036]** and **oSMP [REP1-044]**. This land management change is expected to improve soil structure and functioning, support increases in soil organic carbon, and reduce runoff and siltation compared to periods of bare ground in arable rotations. Under the assessment methodology, a 'high' beneficial magnitude applies where there is potential for improvement in one or more soil functions/volumes due to restoration over an area greater than 20 ha. Given the Scheme's scale and the extent of land transitioning from intensive arable cultivation to grassland/vegetated cover, the 'high' magnitude judgement is considered proportionate. When combined with the conclusion that the principal soil types are generally of medium sensitivity, the result is a moderate beneficial effect which is assessed as being a significant beneficial effect. The Applicant therefore stands by the conclusions of their assessment. However, the Applicant has set out in paragraph 8.3.45 of the **Planning Statement [APP-031]** that in their view this beneficial effect should only be afforded limited positive weight in the planning balance, which would appear to be consistent with the Council's view on this matter. The Applicant agrees that mitigation should be secured through the DCO Agreement and relevant Management Plan(s). However, based upon the information presented above it is not considered there would be potential for a long-term risk leading to negative impact.
16.12	In review: overall, the submitted approach is considered to provide a suitable basis for Examination. It is suggested that all matters raised above regarding Land and Soils are addressed as a single Aspect with related matters and/or issues as identified.	The Applicant welcomes the Council's position that the overall conclusions of **ES Vol 1 Chapter 13 Land and Soils [APP-049]** broadly meet professional judgement, and there are no significant disagreements with the assessment made. The Applicant has responded to the concerns in their response to BBC LIR paragraphs 16.1-16.7 above.

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		It is the Applicant's position that, as set out at paragraph 8.3.45 of the **Planning Statement [APP-031],** the very limited permanent loss of best and most versatile land as a result of the Scheme should be afforded limited negative weight in the planning balance, whilst limited positive weight should be afforded to the condition of soils following the operational phase.
17.1	Matter 85 Review: the Council notes the Planning Inspector's Scoping Opinion ID3.7.1-7- 'The Applicant proposes to scope out an assessment of socioeconomics, land use and tourism from the ES on the basis that the most notable effects would be temporary and only occur during the construction and decommissioning phases of the Proposed Development. The Inspectorate considers that whilst the construction and decommissioning phases may be relatively short, the potential for significant effects remains and the impacts should be appropriately assessed in the ES. The Scoping Report provides limited information to justify scoping out an entire assessment of socio-economic, land use and tourism effect particularly with regards to construction and decommissioning. The Inspectorate cannot agree to scope out an assessment of socio-economics, land use and tourism at this stage. The ES should provide an assessment of this aspect, with the matters to be scoped into the assessment as discussed below' (i.e. table 3.7 Socio-economics, land use and tourism). It is suggested that various matters identified still remain outstanding	The Applicant notes this comment and has responded to the various matters in the rows below.
17.4	Socio-economics, Land-use and Tourism matters are considered within Chapter 14 of the ES [APP-050]. The Scheme 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 Scheme; worker requirements during all phases; changes in access to facilities during construction and decommissioning; and, when any of these impacts act in-combination	The Applicant notes this comment.

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	with those from other developments. Effects will principally arise from employment and related impacts during construction and decommissioning phases and on journeys both for recreation and accessing services and facilities.	
17.5	During construction and decommissioning, the Applicant assesses the Proposed Development as resulting in a significant moderate beneficial effect on the economy at the local level. The Councils consider that there is the potential for a positive effect on the economy but appropriate provision must be made to deliver employment and skills benefits/opportunities locally to realise this. The Councils therefore seek to maximise potential benefits with regards to the local economy, skills, education and employment opportunities through working with the Applicant and engaging with local stakeholders where appropriate. The Councils consider that the Outline Skills Supply Chain and Employment Plan (oSSCEP) currently lacks specific detail on needs addressed, initiatives and a delivery programme to maximise benefits, which the Councils request is addressed.	The **outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163]** establishes the framework for maximising local employment, training and supply chain benefits from the Scheme. The Applicant acknowledges that the **oSSCEP [APP-163]** has been submitted in outline stage and this has been done purposely to establish the overarching framework and commitments for maximising local employment, skills development and supply chain opportunities. The oSSCEP has also been informed by **ES Vol 1 Chapter 14 Socio Economics, Land Use and Tourism [APP-050],** which provides details relating to the local economy, labour market and employment baseline conditions. The final SSCEP would be secured through Requirement 19 of the **draft DCO [REP1-005]**, which provides that a final Skills Supply Chain and Employment Plan (SSCEP), which must be in substantial accordance with oSSCEP, must be submitted to and approved by the local planning authority prior to the commencement of any part of the authorised development. 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 Bedford Borough Council. Based upon the foregoing, the Applicant considers that the **oSSCEP [APP-163]** provides an adequate framework to develop a final management plan in accordance / compliance with DCO Requirement 19.

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17.6	The Council requests that further information is provided by the Applicant regarding impacts on services during construction and decommissioning, specifically relating to potential severance of access to healthcare services and mitigation for potential impacts. The Councils further consider in respect of recreation that an assessment of impacts on all users of Public Rights of Way (PRoW), not only tourism-related PRoW use, should be provided to confirm that no significant effects would arise.	In terms of severance to healthcare services for residents or healthcare services such as the ambulance service it is relevant to note that **ES Vol 1 Chapter 9 Traffic and Transport [APP- 045]** includes an assessment of impacts on driver delay, which concludes the Scheme would have a negligible impact on driver delay along the sections of public highway affected by the Scheme. Whilst the Applicant is mindful of the significance of response times to an ambulance service and or residents needing to visit hospital in an emergency, there is no reason that the construction traffic associated with the Scheme would present any significantly greater impact on response times / accessibility than the existing situation. The Applicant is committed to preparing an Emergency Response Plan as part of the final Construction Environmental Management Plan. They have also updated the **oCEMP [REP1-032]** to state that the Emergency Response Plan should also be shared with the East of England Ambulance Service prior to construction. In terms of impacts on the availability of healthcare facilities as a result of the construction or decommissioning workforce the Applicant would note the following: • All of the construction workers will have their own GPs / GP practices and this will therefore not place any greater burden on local GP practices • The construction contractors generally to offer private healthcare to their workers • On site first aid provision would be provided for minor injuries. In light of the above, the only area where increased pressure on healthcare services could result from the Scheme is in the case of emergencies and impact on hospital accommodation and effects on the ambulance service. Statistics published by the Health and Safety Executive (HSE) on severe, reportable injuries on construction sites (these are the more serious injuries that meet legal reporting thresholds) note that there are 1,690 non-fatal injuries per

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		100,000 construction workers per year in 2024/25 which equals 1.69% of workers injured each year. The HSE Labour force survey reports this as 2.5% because it includes less severe injuries that still required time off work. If the latter figure were translated to the peak workforce for the Scheme (854 workers) it would amount to circa 21 injuries or accidents requiring hospital treatment per year, under 2 per month. It is not considered that this level of demand would materially affect the operation of local hospitals or emergency services. Moreover, these statistics apply to all construction sites many of which have a much higher risk profile than a solar development. On the Council's last point the Applicant can confirm that the potentially significant effects of the Scheme on PRoW in the ES does not rely solely on a tourism-related assessment of PRoW users which is a bespoke element of the socio-economic effects assessment. In addition to ES Chapter 14 (Socio-economics) The impact of the scheme on PRoW and the users of the network are also considered in: • ES Chapter 5: Landscape and Visual Impact Assessment (visual impact) • ES Chapter 9: Traffic and Transport access, connectivity and user safety • ES Chapter 10: Noise and Vibration • ES Chapter 11: Air Quality chapter • ES Chapter 16: Other Environmental Topics (Human Health) physical activity • ES Chapter 17: Cumulative and In-Combination Effects Thus, a full assessment of the Schemes impact on the users of PRoWs has been undertaken by the Applicant.
17.7	The Council notes that there is no Health chapter in the ES or Health Impact Assessment. The Councils would welcome an assessment to demonstrate that their residents' health and wellbeing would not be	The Applicant notes this comment. Whilst a standalone Health Impact Assessment was scoped out of the ES, the Applicant has nevertheless provided an assessment of the Scheme on the 'wider

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	adversely impacted by the Proposed Development during all phases of development.	determinants of health' within Section 16.2 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]**. Section 16.2 concludes that the Scheme is unlikely to result in significant effects on human health (including both physical health and mental wellbeing), at any phase of the development because the relevant health pathways are either not present or are controlled through the mitigation embedded in the topic chapters and secured management plans.
17.8	Finally, during operation, the Council agrees that socio-economics, land-use and tourism effects would be not significant.	The Council's agreement on this point is welcomed by the Applicant .
17.9	Matter 86 Local employment benefit: the Scheme 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 the construction and decommissioning phases. The Applicant assesses economic impacts in relation to 30-minute and 90-minute drive times from the Site as set out in para14.4.6. However, which effects constitute a local and which constitute 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 Council's perspective, constitute local impact. For a moderate beneficial effect in terms of local economic to be realised as concluded in para14.12.1, appropriate provision must be made in the DCO to deliver employment and skills benefits/opportunities locally.	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-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 considered to be proportionate, policy-aligned, and appropriate for the national significance of the Scheme.

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17.9b	The [APP-163] Outline Skills Supply Chain and Employment Plan (oSSCEP) 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 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. The detailed SSCEP would be secured through Requirement 19 of the **draft DCO [REP1-005]**, which provides that a final Skills Supply Chain and Employment Plan (SSCEP), which must be in substantial accordance with oSSCEP, must be submitted to and approved by the local planning authority prior to the commencement of any part of the authorised development. 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 Bedford Borough Council.
17.10	Matter 87 Tourism: the Scheme 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 and Bridleways. Mitigation measures in the [APP-160] Outline Public Rights of Way Management Plan are referred to which would limit impacts. Para14.4.19 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 activity has been presented, only impacts on tourism-related PRoW use. The Council consider that an assessment of impacts on all users of PRoWs should be provided to confirm that no significant effects would arise.	An assessment of impacts on non-motorised users of highways and PRoW is provided in **ES Vol 1 Chapter 9 Traffic and Transport [APP-045]**. The Applicant notes that there would be no permanent closures of PRoW during the operational phase, with all PRoW retained. The proposals also include the creation of new permissive paths for the duration of the Scheme.

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17.11	Matters 88 Local impact(s): impact 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 Council 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 the Highways aspect of this representation. The Council 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 Council 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. Furter narrative on this point is also provided in the Applicant's response to paragraph 17.6 of BBC's LIR above. The impacts of the Scheme on human health are considered in the application, at Section 16.2 of **ES Vol 1 Chapter 16 [APP-052]**.
17.12	**Matters 85 to 89 (LIR):** - as identified and assessed: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR) **Impact 1: Construction Phase** a) Positive: i. The Proposed 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 the construction phase. The Applicant assesses economic impacts in relation to 30-minute and 90-minute drive times from the Site as set out in para14.4.6. However, which effects constitute a local and which constitute a regional level of impact for the purpose of the assessment is not explained.	The Applicant has already prepared a response and further information to address the Council's concerns in Paragraphs 17.1 – 17.11 above. The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s). However, based upon the information presented above however as set out in the responses above this should be considered a positive impact.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	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, the Councils consider, constitute local impact. ii. The Council consider that there is the potential for a positive effect on the economy. However, they consider that for a significant beneficial effect of moderate scale to be realised as concluded in para14.12.1, appropriate provision must be made to deliver employment and skills benefits/opportunities locally. Without such provision and such provision being secured in the DCO, it considers that the impact on the local economy could be beneficial but of a minor scale. b) Neutral: i. In regard to tourism, the Proposed 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 and Bridleways. Mitigation measures in the [APP-160] Outline Public Rights of Way Management Plan are referred to which would limit impacts. Para14.4.19 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 activity has been presented, only impacts on tourism-related PRoW use. The Council consider that an assessment of impacts on all users of PRoWs should be provided to confirm that no significant effects would arise. ii. Impact 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. In its assessment of impacts on private and community assets, the Applicant makes reference to impacts on access to and from economic	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	assets, concluding that effects would be negligible, however community facilities do not appear to have been assessed for this impact. Council 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 the Highways aspect of this representation. Specifically, the Council 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. iii. The Council notes that there is no health chapter in the ES or Health Impact Assessment. The Council would welcome an assessment to demonstrate that their residents health and wellbeing would not be adversely impacted by the Proposed Development during all phases of development. c) **Negative:** no negative socio-economics, land-use and tourism effects arising from construction of the Proposed Development have been identified. **Mitigation 1: Construction Phase** a) Relevant to its assessment of beneficial effects on the local economy, the Applicant's [APP-163] Outline Skills Supply Chain and Employment Plan (oSSCEP) sets out a strategy to maximise local employment, skills development and supply chain opportunities. The Council welcome that the Applicant has prepared an oSSCEP. However, the Council consider that this currently 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	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	for developing the oSSCEP further should also be provided, for example, it is not clear on the timeline for developing the strategy when stakeholder engagement will take place and how regular this will be. b) Pending consideration of impacts on access to healthcare facilities by the Applicant, where impacts are identified or have the potential to arise, appropriate mitigation measures should be identified to reduce, minimize or avoid impacts on the local community. **Impact 2: Operational Phase** a) **Positive:** the Proposed Development has been assessed by the Applicant as resulting in a not significant minor beneficial effect on the economy at both the local level and regional levels. As noted above for construction impacts on the local economy, what constitutes local and regional impact levels for the purpose of the assessment is not explained in the chapter. Notwithstanding this, the Council agrees that effects would be not significant. b) **Neutral:** neutral or negligible effects during operation are recognised in relation to tourism, private and community assets and development land. c) **Negative**: no negative socio-economics, land-use and tourism effects arising from operation of the Proposed Development have been identified. **Mitigation 2: Operational Phase** a) No additional mitigation measures beyond those identified in the chapter are considered necessary for operation of the Proposed Development. **Impact & Mitigation 3: Decommissioning Phase** – as set out for construction.	

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	Contractual (all Phases): to be secured through the relevant Management Plan(s): – potential long-term marginal positive impact; hold as neutral impact.	
17.13	Overall, the submitted approach is considered to provide a suitable basis for Examination, subject to the matters identified above being addressed through the Examination process.	This is welcomed. The Applicant hopes that their response both in this document and in their response to the Councils RR's can lead to resolution during the examination.
18.1	Matter 90 Full life-cycle carbon footprint: the Council note that the Applicant's Scoping Report does not address where the infrastructure elements/ 'kit-of-parts' are to be manufactured (para13.5.2 'global suppliers') and decommissioned. The Council would suggest that the full life-cycle carbon footprint has to be assessed, including the manufacturing of components made internationally/ sub-regionally and shipped/ railed as freight into/ across the UK (Ref. Scoping Report, 2023) (Ref. Planning Inspector's Scoping Opinion ID3.9.5, ID3.9.8). **Matter 90 (LIR):** - in response to the Examining Authorities statement in the Rule 6 Letter, Annex F(9) 'Ethical procurement for imported plant and equipment', this matter is not taken forward.	The change in the Council's position on this matter is noted and welcomed by the Applicant.
18.2	Matter 91 Scoping: The Applicant's Table 15.4 (Climate Change) Summary of matters proposed matters to be scoped in/out. In the Council's review: a) The Council's reading of Table 15.4 suggests that once all infrastructure elements have been installed/ constructed there will be no further need to replace these elements and hence Topics 9 (Raw materials) to 13 and 19 (on-site maintenance) have been scoped out. Over the intended operational phase of 40-years these assumptions need to be questioned in light of continually changing technologies, etc. While the Applicant states that effects may be negligible, this is currently not known. Consequently, all topics hereby noted	Table 15.4 from **ES Vol 2 Appendix 4-1 EIA Scoping Report [APP-064]** summarises the scope of the climate change assessments (both the Climate Change Resilience Assessment and the Greenhouse Gas Assessment) which proposed to scope out maintenance activities during operation and travel of workers during all phases. The scope of the GHG assessment was expanded following the **ES Vol 2 Appendix 4-2 EIA Scoping Opinion [APP-065]** and the final scope of the GHG Assessment is presented in Table 15.8 of **ES Vol 1 Chapter 15 Climate Change [APP-051]** and calculated in Table 16 in **ES Vol 2 Appendix 15-1 Greenhouse Gas Emission Assessment [APP-116]** which includes 'Energy

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	relating to operation (management and maintenance) should be scoped in (Ref. Scoping Report, 2023) (Ref. Planning Inspector's Scoping Opinion ID3.9.5). b) (para14.5.9) Travel of workers: there will be '10-16 staff on-site at any one time', 'visitor trips per week', and (para14.5.10) trips associated with staff on-site movement and maintenance. The Council would wish to see this accounted for, however negligible, as currently the full extent of this activity could be more extensive in regard to the matters above (Ref. Scoping Report, 2023) (Ref. Planning Inspector's Scoping Opinion ID3.9.7, It is suggested that the full extent of the operational phase, specifically relating to replacement activity, requires assessment and address by the Applicant. **Matter 91 (LIR):** - as identified and reviewed: a) It is suggested that Matter 91(a) is addressed within Matter 78. b) It is suggested that Matter 91(b) is addressed within Matters 85 - 89.	consumption, material and waste generation from ongoing Site maintenance' during operation and travel of workers during all phases. Therefore, it is considered that the full extent of the operational phase, including replacement activity, has been addressed by the Applicant.
18.3-18.6	Stage 3 (Pre-Examination Review) It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters. The assessment of this aspect is common to each of the three Host Authorities, so the assessment does not differentiate between them. Instead, all of the points noted in relation to Climate Change below apply equally to each of the Host Authorities. Climate Change has been considered by the Applicant as part of the Environmental Statement in Chapter 15 [APP-051] and supporting figures and appendices, building on matters raised during the earlier pre-application and PEIR consultation stages.	This is noted by the Applicant

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	There are three distinct aspects to the climate change assessment: a Greenhouse Gas (GHG) Assessment looking at the impact on the climate of the Proposed Development; a Climate Change Risk Assessment (CCRA) looking at the resilience of the Proposed Development to a changing climate; and, an In Combination Climate Change Impact (ICCI) assessment that considers how climate change may alter the potential effects identified by other technical assessments within the Environmental Statement.	
18.7-18.11	Summary The Proposed Development will result in a range of climate related impacts across construction, operation, and decommissioning. Consistent with assessments undertaken for comparable Nationally Significant Infrastructure Projects, construction and decommissioning phases are expected to generate negative greenhouse gas (GHG) emissions, primarily due to plant use, materials production, transport movements and land disturbing activities. No positive or neutral construction phase climate impacts have been identified. During operation, the Proposed Development would contribute to national decarbonisation objectives by facilitating lower carbon electricity generation, representing a positive climate impact, although some minor negative operational emissions remain unavoidable. The GHG assessment has been undertaken in line with ISEP guidance and sets out the beneficial impact of the Proposed Development overall in terms of contributing to UK's net zero goals. In relation to climate resilience, construction and decommissioning activities may be temporarily exposed to climate related hazards, such as extreme rainfall, heat events or high winds, representing negative short term resilience impacts. However, these do not influence the Proposed Development's long term climate performance. Operationally, the infrastructure may experience climate driven stressors linked to future temperature increases, wind	The Applicant welcomes a positive summary of their assessment and confirmation it has been carried out in accordance with the necessary guidance.

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	loading, or precipitation intensity. These impacts were assessed in line with guidance issued by ISEP and found there to be no significant negative impacts if mitigated in line with embedded mitigations. With respect to Inter related Climate Change Impacts (ICCI), the Proposed Development may experience interactions between future climate conditions and environmental, social or operational topics, including drainage, landscape condition, biodiversity sensitivity, soil stability and welfare considerations for site personnel. These interactions constitute negative impacts across all phases unless appropriately mitigated as set out through the assessment. No positive or neutral ICCI effects were identified. Across all three assessments, effective mitigation—secured through the CEMP, OEMP and future Decommissioning Plans—is essential to reducing impacts. Required measures include low carbon construction practices, efficient logistics, climate resilient design specifications, extreme weather contingency protocols, and cross topic adaptation measures for drainage, soils and ecological management.	
18.12 – 18.13	Matter 92 Approach: the Council welcomes the approach taken by the Applicant in carrying out the GHG Assessment and recognises that this is broadly aligned with the guidance issued by the Institute of Sustainability and Environmental Professionals (ISEP) in February 2022. In relation to the GHG Assessment, the Council make the following observations, noting that none of them materially affect the overall outcome of the assessment: Matter 93 Historic climate data: the Council welcome the methodology applied to the Climate Change Risk Assessment (CCRA) and note that it is consistent with guidance issued by ISEP. However, in reference to the CCRA, an inconsistent use of historic	The Applicant notes each of the matters the Council has set out in the context of required mitigation requirements, particularly within the Construction phase of the Scheme, and has sought to respond to each in turn. a) The Applicant understands that the receptor for the GHG assessment is the global climate and can confirm that has formed the basis for their assessment. b) The Applicant understands that the replacement frequency of components can affect the embodied emissions during the operational phase of the Scheme. Table 14 in **ES Vol 2 Appendix 15-1 Greenhouse Gas Emission Assessment [APP-116]** summarises the assumed life expectancy of the equipment with the battery modules having a life expectancy of 20 years (i.e. one replacement over

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	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 should be addressed. **Matters 92 and 93 (LIR):** - as identified and assessed: (Please note that this is taken from the External Consultant's assessment and may be duplicated across the other Host Authorities' LIR) **Impact 1: Construction Phase** a) **Positive:** no positive climate impacts arising from construction have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment. b) **Neutral:** no neutral climate impacts arising from construction of the Proposed Development have been identified in the GHG Assessment, CRA or ICCI Assessment. c) **Negative**: i. For the GHG Assessment, construction activities will generate greenhouse gas emissions from plant, materials manufacture, transport, and land disturbance. These emissions represent a negative impact on climate during the construction activity. ii. There are no negative impacts anticipated in the CRA or ICCI as working practices are anticipated to be able to adjust over the short construction activity period. **Mitigation 1: Construction Phase** a) The assessment should explicitly recognise that the receptor for the GHG assessment is the global climate. This is implied but not stated.	the lifetime of the Scheme). This is considered conservative and broadly in line with other GHG assessments for Solar DCO developments. If the life expectancy of the modules was reduced to 10 years (i.e. three replacements over the lifetime of the Scheme) to consider a worst-case scenario, the lifetime GHG intensity would increase from 41.7 gCO_2e/kWh to 42.9 gCO_2e/kWh. Therefore, the conclusions of the assessment would remain unchanged. c) The Scheme would not import electricity from the grid for the purpose of operating the Scheme. Instead, the Scheme will consume some of the electricity generated during the operational phase but emphasises that it would be very limited. Therefore, the effect of this on the GHG assessment will be minimal and would not change the conclusion of the assessment. d) The Applicant understands that the presence of peat within the site has the potential to substantially increase the GHG impact from land use change, but only if this peat disturbed and the carbon sink it provides is removed. The Applicant has undertaken soil surveys across the vast majority of the Site (as set out in **ES Vol 2 Appendix 13-1 [APP-115]**) and has no reason to believe that peat is present at any location within the Site. As per paragraph 8.6.12 of **ES Vol 1 Chapter 8 Hydrology and Flood Risk [APP-044],** online mapping indicates that no peat is present at the site. In addition, the Natural England Peat Map does not indicate a likelihood of peat being present anywhere near the Site. In relation to future peat management should it be encountered unexpectedly, the Applicant has updated the **oCEMP [REP1-032]** to commit to the preparation of a Peat Management Plan should peat be encountered on site following any further ground investigations. e) The Applicant intends to use the BESS in a grid balancing capacity but at this stage, the output capacity and length of time is unknown. When the BESS is being used for grid balancing, the electricity would be displacing fast response, gas fired peaking plants which typically operate with gas engines or open cycle gas turbines. This would be an additional benefit of the Scheme not accounted

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	b) 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. c) 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 Proposed Development's whole life GHG impact, but it should be included for completeness. d) 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. e) 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. f) 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. g) The Beneficial evaluation of significance means that embedded GHG mitigation measures have not been considered necessary; the Council would note that suitable GHG mitigation measures	for within the GHG Assessment. Accordingly, this does not change the conclusions of the assessment. f) The assessment fully considers the implications of various displacement factors in calculating the displaced emissions, as outlined in Table 15.15 of **ES Vol 1 Chapter 15 Climate Change [APP-051]**. Furthermore, the consideration of different comparators has been explicitly integrated into the analysis and detailed within the 'Summary of the GHG Assessment' section, specifically in paragraph 15.8.29 of **ES Vol 1 Chapter 15 Climate Change [APP-051]**. As such, even if the Planning Inspectorate (PINS) does not accept the use of existing, unabated CCGT generating capacity as the counterfactual scenario, the beneficial evaluation of significance remains robust, and the conclusion of the assessment are not affected. g) Firstly, as noted above in response to section f), the beneficial evaluation of significance remains valid. 'Embedded mitigation' measures are those which the Scheme will need to comply with and were identified in section 15.7 of **ES Vol 1 Chapter 15 Climate Change [APP-051]**. The assessment of significance was determined accounting for these. As the assessment concluded that the impact of the Scheme on climate change would be a "beneficial effect which is significant", no additional mitigation is deemed necessary to further reduce impacts. However, for completeness 'additional mitigation' measures were identified in Paragraph 15.9.2 of **ES Vol 1 Chapter 15 Climate Change [APP-051]**. The Council's points h and I are noted by the Applicant, and the integration of mitigation would be carried out when finalising the relevant Management Plans.

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	across all phases of the Proposed Development should always be considered and secured by the DCO if found practicable. h) For the GHG Assessment, embedded and additional mitigation actions have been set out in paragraphs [APP] 15.7.3 and 15.9.2 respectively. These actions should be embedded and tracked throughout the design process. i) The oCEMP sets out mitigation measures for the CRA and ICCI. These actions should be embedded and tracked throughout the construction process. **Impact 2: Operational Phase** a) **Positive:** for the GHG Assessment, the Proposed Development will contribute to national decarbonisation objectives by supporting low carbon electricity generation, resulting in long term positive climate outcomes consistent with NPS EN 1. No positive climate impacts arising from operation have been identified in the CRA or ICCI Assessment. b) Neutral: no neutral climate impacts arising from the operation of the Proposed Development have been identified in the GHG Assessment, CRA or ICCI Assessment. c) Negative: i. For the GHG Assessment there are negative impacts on the climate from GHG Minor operational emissions, these are mostly resulting from replacement of equipment throughout the lifecycle of the Proposed Development. These emissions are exceeded by the offsetting benefits of low-carbon energy generation from the Proposed Development. ii. For the CRA there are negative impacts to the proposed development from climate change. These comprise impacts to operational equipment, vehicle access to the Proposed Development, and on-site workers. These effects are all assessed to be slight/negligible and not significant.	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Mitigation 2: Operational Phase a) Operational emissions should be minimized through maximizing the lifecycle of components, and sourcing low carbon materials in replacement via the OEMP for mitigating GHG emissions. b) No additional mitigation is required for the CRA or ICCI assessments. **Impact 3: Decommissioning Phase** a) **Positive:** no positive climate impacts arising from decommissioning have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment. b) **Neutral:** no neutral climate impacts arising from decommissioning of the Proposed Development have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment. c) **Negative**: i. Decommissioning activities, including dismantling, transport, plant use, and material processing, will generate greenhouse gas emissions comparable to construction works and therefore constitute a minor, not significant, negative climate impact. ii. There are no negative impacts anticipated in the CRA or ICCI as working practices are anticipated to be able to adjust over the short decommissioning period. **Mitigation 3: Decommissioning Phase** a) No additional mitigation is required for decommissioning for the GHG assessment. The oDEMP sets out mitigation measures for the CRA and ICCI. These actions should be embedded and tracked throughout the decommissioning stage.	

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Contractual (all Phases): to be secured through the Management Plan(s): – neutral impact.	
19.1	Matter 94 Energy and sustainability (Carbon/ energy efficiency): the Council notes that they do not have the necessary technical discipline relating specifically to solar farms to respond on this aspect. On this basis, the Council will not be looking at submitting Relevant Representations to the Examination on this matter. However, the Applicant should have reference to the Council's Carbon Reduction Delivery Strategy 2020-2030 Version 2 (December 2024). The Application further fails to reference the Council's Carbon Reduction Delivery Action Plan 2024 – 2026 and the associated Carbon Reduction Delivery Action Plan Update FY 2023/24 – 2024/25. **Matter 94 (LIR):** - as identified and reviewed: to be referenced by the Applicant.	The Applicant acknowledges that reference should have been made to the following documents within **ES Vol 1 Chapter 15 Climate Change [APP-051]**: • Carbon Reduction Delivery Strategy 2020-2030 Version 2 (December 2024); • Carbon Reduction Delivery Action Plan 2024 – 2026; and • Carbon Reduction Delivery Action Plan Update FY 2023/24 – 2024/25 Upon review of these documents, the Applicant confirms that they do not alter the conclusions of the assessment. These reports outline the Council's commitment to achieving net-zero carbon emissions by 2030 through the implementation of sustainable, low-carbon initiatives across council operations and the wider community. Solar power directly supports these objectives by providing a clean and sustainable energy source, while battery storage aligns with efforts to integrate renewables by addressing intermittency and promoting efficient energy use.
19.2	Recycling and waste management: the Council has reviewed the [APP-164] Outline Waste Management Plan and do not believe that there are matters relating that they wish to raise at the Examination.	The Applicant notes this comment and welcomes agreement with the Council on the scope of the **outline Waste Management Plan [APP-164]**.
19.3	Matter 95 Minerals and Waste: The Council has been in contact with the Minerals and Waste team at Central Bedfordshire Council (CBC), which is a shared service with the Council and provides technical advice regarding aspects relating to the safeguarding of minerals extraction sites. Much of the land around Pertenhall is designated as a mineral safeguarding area (MSA) with likely deposits of river valley/ glacial sand and gravel; the following issues arise: **Matter 95 (LIR):** - as identified and reviewed:	The Applicant acknowledges the Scheme is sited partly across mineral safeguarding areas (MSAs) and has prepared a Minerals Safeguarding Report at Appendix B of the **Planning Statement [APP-031]**. The extent of the MSAs in relation to the Order limits are shown on **ES Vol 3 Figure 13-5 [APP-150]**. The Applicant's position is that the Scheme does not give rise to permanent sterilisation of safeguarded mineral resources and therefore does not trigger a requirement for full extraction ahead of development in the way suggested in the Council's comments. The Scheme is temporary and reversible, with an

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	a) **Impact** (all Phases; local to sub-regional scale): concern of arising negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. Local and national policies seek to prevent the sterilisation of such resources by development. Should the Proposed Development be permitted within a Minerals Safeguarding Area (MSA), then the Minerals and Waste team at Central Bedfordshire Council's Policies MSP11 and 12 Minerals of the Waste Plan 2014 would apply which would seek the full extraction of such minerals within the mineral safeguarding area prior to development of the Proposed Development. This raises a significant matter that will require discussion at Examination. ii. The Applicant's attention is drawn to the following planning policy: ▪ Minerals and Waste Local Plan: Strategic Sites and Policies (January 2014) Policies MSP11 and MSP12 and the Development Framework's Technical advice note regarding mineral safeguarding areas which should be read as a material consideration. A map illustrating the affected areas can be furnished at Examination; ▪ Minerals and Waste Strategic Policy MWSP 1 - Presumption in Favour of Sustainable Development; ▪ Minerals and Waste Strategic Policy MWSP 3 - The Determination of planning applications; and; ▪ Minerals and Waste Strategic Policy MSP 6 – Mineral Extraction outside Allocated Sites. iii. It is suggested that this matter is taken-up and resolved directly by the Applicant d) **Contractual:** to be secured through the Management Plan(s): – neutral impact.	operational period of 40 years followed by decommissioning, with the land capable of being worked for minerals post-decommissioning if required. Article 35 of the draft DCO [REP1-005] incorporates the 'mineral code' (Parts 2 and 3 of Schedule 2 to the Acquisition of Land Act 1981) to any land acquired by the Undertaker that may contain mines and minerals. The effect of this provision is that the Applicant is prevented from acquiring the rights to any mines and minerals underneath the acquired land, unless expressly purchased, and provides mine owners with the ability to work the mines and extract minerals, subject to restrictions. Article 35 is based on the model provisions. Similar drafting is included in other DCOs including Article 31 of The Oaklands Farm Solar Park Order 2025, Article 21 of The Mallard Pass Solar Farm Order 2024 and Article 47 of The Cottam Solar Project Order 2024. This is an entirely different issue from possible sterilisation of such resources and its purpose is to address any compensation issues in the context of land acquired compulsorily. For that reason, the Applicant's position is that there is no conflict between the **draft DCO [REP1-005]** provisions and MSA safeguards. The Applicant notes that there are similar MSAs within the Cambridgeshire area, and that Huntingdonshire District Council (whilst not the minerals and waste authority) consider the Applicant's judgement that minerals would not be sterilised to be adequately developed, and that they support the Applicant's conclusion (para.14.8, **[RR-494] and paragraphs 2.7.1 -2.7.3 of their LIR**). The Applicant agrees that mitigation should be secured through the DCO and relevant Management Plan(s) and that there would be a neutral impact.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
19.4	Matter 96 Decommissioning phase: the Applicant's PEIR and the Council's response notes: a) para2.4.60 *'The internal roads to the BESS would be constructed of tarmac, concrete or similar to allow for heavier vehicles during construction and decommissioning, and safe access for fire services in emergency situations'*. It would be a requirement that all routes, hardstanding areas, para2.4.87/96-98 Cable joining chambers, para2.4.133 Retention basin, Work No. 9 (access), and all concrete foundation/ works are removed at the decommissioning phase (to prevent long-term leaching, contamination, and in the interest of public safety regarding sunken chambers) (Ref. PEIR Report, 2024). b) para2.7.1 any infrastructure that is more than one metre below ground level, such as cable conduit and casing, would be left in situ (Ref. PEIR Report, 2024) (Ref. Planning Inspector's Scoping Opinion ID2.1.10, ID2.2.1). In review of [APP-031] Decommissioning Phase, the Council notes: a) para4.9.2 *'Sub-surface infrastructure deeper than 1 m, such as cable conduits, will generally remain in place to minimise environmental impact'* – as noted elsewhere in this response, this approach is NOT acceptable to the Council. b) Para4.9.3 '*however, as the land would be handed back to the landowners on completion of decommissioning the longer-term retention of the landscaping improvement works cannot be guaranteed'*. The Council requires both clarification on this matter (i.e. the permanent tatus of enhancements made to existing PRoW and any commitment to permissive routes), and, notes that these matters should not be afforded full weight in terms of planning benefit(s) as set out by the Applicant until such time as their long-term status is confirmed.	a)The Applicant has already responded to this point with reference to paragraph 11.2 of BBC's LIR above. b) The Applicant has already responded to this point with reference to paragraph 6.14 of BBC's LIR above. The Applicant agrees that mitigation should be secured through the DCO Agreement and relevant Management Plan(s). However, as stated previously, the Applicant does not consider that the action as of third parties after the decommissioning phase should have a bearing on whether the scheme has a negative impacts and that conclusion is not agreed.

Para Ref.	BBC Local Impact Report Comment	Applicant Response
	Matter 96 (LIR): - as identified and reviewed: a) **Impact** (all Phases; local to sub-regional scale): concern of arising **significant environmental and human health** permanent negative impact(s). b) Neither positive nor neutral impacts are identified. **c) Mitigation measures:** i. In terms of Matters 96(a)(d) it is suggested that those elements of the Application works which are to be removed, and those elements of the PROW network, habitat and landscape instatement which are to be retained (in some cases by the landowners) during the Decommissioning Phase needs clarification in order to assess long-term harm and benefit. Currently this is unclear. ii. In terms of Matters 96(b)(c), as noted in Matter 45, the Council are not in favour of this approach. iii. It is suggested that this is resolved in association with Matters 31 and 45. d) **Contractual:** to be secured through the Management Plan(s): – – potential long-term negative impact if not removed.	
19.5	Matter 97 Oil pipeline: [APP-031] Planning Statement para3.2.15 – the Application does not make reference to the disused oil pipeline present within the landscape that might potentially impact upon Sites A and B and will need to be addressed (para 4.7.23 and ES Vol 3 Figure 2-3: Indicative Crossings Plan [EN010141/DR/6.3] refers). The Applicant will need to demonstrate that discussions have been held with the infrastructure owner and that the ES demonstrates an approach to potential residual risk. **Matter 97 (LIR):** - as identified and reviewed: to be clarified by the Applicant.	The Applicant explicitly address the decommissioned oil pipeline, which is noted at paragraph 4.7.23 of the **Planning Statement [APP-031]**, and shown on **ES Vol 3 Figure 2-3 Indicative Crossings Plan [APP-123]**. The Applicant notes that the linework for the 'Former Oil Pipeline' on Figures 2-3b and 2-3c **[APP-123]** is faint and only more visible when zooming in on the PDF. The Applicant has updated **ES Vol 3 Figure 2-3 Indicative Crossings Plan [REP1-029]** to improve the clarity of the figure. The former oil pipeline is also described at paragraph 2.5.45 of **ES Vol 1 Chapter 2 The Scheme [APP-038]** and assessed in **ES Vol 1 Chapter 12 Ground Conditions [APP-048]**. Paragraphs 2.5.45 **[APP-038]** and 12.7.2 **[APP-048]** identify mitigation measures to protect the pipeline during construction. However, the Applicant acknowledges these were not reflected in

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		the **oCEMP [REP1-032]** which was updated prior to Deadline 1(April 7th) to include control measures for the former oil pipeline. The Applicant provided a letter at **Appendix A** of their response to the Council's **Relevant Representations [REP1-055]** as evidence that the former oil pipeline has been decommissioned.
19.6	Community Benefit Fund: [APP-031] Planning Statement para5.5.3, the statement by the Applicant that the proposed Community Benefit Fund, whilst providing local benefits cannot and should not be taken into account within the planning balance, is supported by the Council. Such funds are legally non-material to the planning decision and are not a means of mitigating the Scheme's environmental or social impacts. It is noted that both the Applicant and Council have engaged or initiated discussions with the Parish Councils and local community to begin to draft a list of project/funding requests. This will be tabled as draft during the Examination for discussion. For completeness, the Applicant's offer of (para 5.5.1) *'….a Community Benefit Fund of £400 per MW per year. This is expected to amount to approximately £6.4 million, over the 40-year life of the solar farm'* is noted.	The Applicant notes this comment. The Applicant is committed to providing the community benefit fund but is not intending to publish a draft list of project / funding requests as part of the Examination (as suggested by the Council).
20.1	**[APP-162] Outline Battery Safety Management Plan (OBSMP):** in reviewing this Plan, the Council wish to raise certain matters; namely:	No comment.
20.2	Matter 98 BESS firewater storage site: in the Council's PEIR response, the Council raises the matter of NFCC Guidance regarding that consideration should be given within the site design to the management of water run-off such that in an emergency situation where polluted water may run-off from the facility this could be safely contained and treated, rather than risking pollution of groundwater or	The Applicant has responded to each of the Council's comments in turn below. a) The maximum extent of Work No 6b is shown on Sheet 10 of the **Works Plan [APP-009]**. The Applicant has set this maximum extent based on the results of hydraulic modelling, as reported in the **oSWMP [REP1-046]**, with an outline drainage plan for the retention basin that would form Work No 6b shown on

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	local watercourses. It was further noted that the management and removal of contaminated firewater would need specific address within any Operational Environmental Management Plan including an emergency strategy should such firewater breach into river catchment areas and/or leach into ground water or soils. In this regard [APP009; Dwg. 010] the Application has identified sites for Work No. 2 (BESS facility) and No. 6b (drainage lagoon); the Council would want the following addressed: a) As annotated, Work No.6b should not be coloured Work No. 1 nor cross-hatched as Work No. 6 to ensure that this site is secured solely for the duration of the Scheme for the 'drainage lagoon' (which we read as fire water storage area/ NFCC 'bunded lagoon'). b) The Application does not indicate a minimum size of the Work No. 6b site (hectares). While there is limited guidance in this regard, the NFCC state that *'Any calculations for sufficient water supply for an appropriate suppression system… Water run-off and potential impact on the environment, along with mitigation measures, should be considered and detailed in the Emergency Response Plan'*. i.e. the full volume of water required in any fire suppression should be contained on site to limit harm of such firewater. [APP-162] The outline Battery Safety Management Plan para4.5.6 gives a commitment to the *'drainage design will provide sufficient capacity to contain either the full firefighting volume in combination…'* but no actual site area is stated. This is a material consideration as the site area required, plus management access around the lagoon, may be far larger than the area currently indicated. Suggest that a dashed area, free of Work No.1 (solar panels), is indicated surrounding the current site area to accommodate any design resolution of this matter.	Figure 3 of the oSWMP. These calculations were based on reasonable worst-case assumptions and include for the storage of all water from the two water storage tanks associated with the BESS if they were both discharged simultaneously. The Applicant has deliberately overlapped Work No 1 with Work No 6b such that if the final retention basin is smaller than currently shown, panels could be introduced in the area to increase generation capacity. The Applicant would not build solar panels over the retention basin, or in a way that affected safe maintenance and access. The Host Authority would have approval of the final detailed design through the relevant post-consent approvals in accordance with Requirements 3, 10 and 14 of the **draft DCO [REP1-005]**. b) The layout of the retention basin shown on **ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121]** is indicative only, reflecting the outline design shown on Figure 3 of the **oSWMP [REP1-046]**. Whilst this reflects a realistic representation of the anticipated footprint of the retention basin, it could be smaller or larger than illustrated, so long as the basin does not exceed the footprint of Work No 6b as shown on Sheet 10 of the **Works Plan [APP-009]**, and is of a minimum capacity to meet the drainage requirements for the BESS and Substation area (including fire water retention), as approved by the relevant Host Authority. The detailed design of the retention basin would be finalised through the relevant post-consent approvals in accordance with Requirements 3, 10 and 14 of the **draft DCO [REP1-005]**. c) The Applicant notes this comment. The retention basin will be designed safely in accordance with the Applicant's wider responsibilities, e.g. duties under the Construction (Design and Management) Regulations 2015. As above, the detailed design of the retention basin would be finalised through the relevant post-consent approvals in accordance with Requirements 3, 10 and 14 of the **draft DCO [REP1-005]**

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	c) [APP-121] ES Illustrative Environmental Masterplan Fig. 2-1k indicates an even smaller retention basin than suggested in [APP-009; Dwg. 010] Work No. 6b, which well illustrates that this matter requires resolution. d) The Applicant notes that the BESS facility will largely be un-manned. Should the lagoon contain standing water at depth, then the Applicant will need to evidence measures regarding water safety.	
20.3	Matter 99: Issue for consideration within the oBSMP: a) Para's 1.1.3, 1.1.4 and 1.5.3: it is suggested that any oBSMP should mention also having due consideration and reference to Environmental Legislation and Planning Policy regarding mitigation of harm, guidance, and good practice. b) Para's 1.2.1 etal: as a courtesy, the Council would want the Applicant to consult with Bedford Fire & Rescue as they act in a supporting emergency role with Cambridgeshire Fire & Rescue Service. Could the Applicant confirm if any such discussions/ liaison has been undertaken? c) The Council note that part of the BESS fire strategy is to use para2.4.6(6) (also para4.1.4, 4.3.1) '*fire hydrants and/or static water tanks for firefighting dependent on available water supply'.* It is strongly recommended that the Applicant evidence that there is sufficient water capacity and pressure within the current infrastructure as it is generally accepted that both these issues present intermittent problems in the local area d) In general, Chp 4 Firefighting, which addresses numerous matters regarding BESS fires and the management of firewater, matters originally raised by the Council in their Scoping and PEIR Response, is comprehensive and address matters as raised.	The Applicant welcomes BBC's agreement with the **outline Battery Safety Management Plan (oBSMP) [APP-162]** subject to the clarity on the matters raised here. The Applicant has addressed each of the Council's points in turn below. a) In terms of environmental legislation and regulatory compliance, the **oBSMP [APP-162]** does not attempt to set out a definitive list of applicable legislation and policy at this outline stage. Instead, it requires that the final BSMP includes a statement on "**overall compliance of the system with applicable legislation**" (paragraph 5.1.9, **[APP-162]**). b) Requirement 10 of the **draft DCO [REP1-005]** provides that the final BSMP must be submitted to and be approved by the local planning authority (which for the BESS would be Huntingdonshire District Council) in consultation with Cambridgeshire Fire and Rescue Service and the Environment Agency. The Applicant considers this approach to be appropriate as the BESS facility is within the Cambridgeshire area. The Applicant has agreed a statement of common ground with the CFRS **[PDA-019]** which confirms their acceptance of the details shown in the oBSMP **[APP-162]**. c) The Scheme includes two separate static water tanks that would not be dependent on a water main, or mains water pressure. The water capacity of each tank would be no less than 228,000 litres in capacity, capable of delivering 1,900 litres per minute. This is in excess of NFCC guidance.

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	e) For clarity, the Council would suggest that the Applicant is consistent in defining the 'drainage lagoon' across their submitted material as per the NFCC' term of 'bunded lagoon' Conclusion para6.1.1. 'This outline Battery Safety Management Plan (oBSMP) has demonstrated in a systematic way the mitigation of the safety risks posed by the BESS that forms part of the Scheme'. Subject to the matters raised, as read, the Council would support this statement. **Matters 98 and 99 (LIR):** - as identified and reviewed: it is suggested that these Matters are consolidated with the addressed of Matter 76.	d) The Applicant welcomes BBC's agreement on this matter. e) The Applicant notes this comment but considers the function and control measures of the drainage lagoon are appropriately secured through the **draft DCO [REP1-005]**.
20.4 – 20.7	Matter 100 Draft DCO: as noted within this response, the Council is currently NOT supportive of the [APP-016] Draft Development Consent Order - this requires clarification, detailed resolution of matters, and understanding of agreed powers. Matter 101 In relation to the above position, the Council make a similar statement regarding the [APP-017] Explanatory Memorandum. The Council refers the Applicant to Appendix 1: Acquisition of Rights of effected Public Rights of Way (PRoW) and temporary possession of the Public Highways regarding powers sought. The Council refers the Applicant to Appendix 2: DCO Agreement regarding a provisional review of Schedules 2 and 3. **Matters 100 and 101 (LIR):** - as identified and reviewed: it is suggested that these Matters are addressed within Aspect 1.1 to 1.5; currently, the Council do not support these documents as tabled.	The Applicant notes this comment and at Deadline 1 (7th April 2026) provided a series of updates to the **draft DCO [REP1-005]** and the **Explanatory Memorandum [REP1-007]** that explicitly respond to a number of the points raised in BBC's submissions. The Applicant has also subsequently (17th April) held a meeting with BBC and their appointed legal representatives on the current drafting of the DCO (including the recent changes). Whilst there is currently no firm resolution on all matters of concern the Applicant is committed to continue dialogue with BBC and their legal advisor to agree the wording of the **draft DCO [REP1-005]** prior to the end of examination.
21.1	Matter 102 Extant planning consent: the [APP-031] Planning Statement (para3.3.3 and Appendix A) state that '*there are no pending or extant planning consents across the Order Limits that are affected by the Scheme*'. The Council do not agree with this	A comprehensive assessment of cumulative effects was carried out by the Applicant, prior to the submission of their DCO application, which follows all relevant guidance on Cumulative and In-combination Effects Assessment, including the Planning Inspectorate's Advice Note 17**.** This is clearly set out in

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	statement. The following three consents should be referred to, considered, and listed in Appendix A. They are referred to in [APP-032] (Statement of Compliance) against the requirements of EN3 - point para2.10.141 refers: a) 22/01828/MAF – Land South of Bushmead Road, Staploe - Installation of a Battery Energy Storage System (BESS) et al; b) 22/01998/MAF – Land North of Bassmead Manor and Home Wood, Staploe - Solar Farm and associated development; and, c) 24/00858/MAF – Land to the North and South of Bushmead Road, Staploe and West of Eaton Socon - Installation of a solar array of up to 49.9MW AC and other associated works In addition to the above list the following applications should also be referred to, considered, and listed in Appendix A.: d) 22/01774/MAO - Land South Of A428, Wyboston Lakes, Great North Road, Wyboston, Bedfordshire - Outline planning application with all matters reserved except for access for a business park development with up to 23,400 m2 of floor space, the construction of new access onto the A428 incorporating a signalised pedestrian/cyclist crossing, and new strategic landscaping (allowed on appeal 25th March 2024); e) 25/01471/EIA - Land North Of Podington Road And West Of The Main Railway Line, Wymington, Nr Rushden NN10 9FT - Temporary planning permission for change of usefrom agricultural land to shared use to also include construction and operation of a solar farm with an operational phase of up to 40-years and associated infrastructure; ecological enhancements and landscaping works; creation of, and alterations to, vehicular access; and other associated works (pending consideration); and,	**ES Vol 1 Chapter 4 [APP-040]** and supported by **ES Vol 3 Figures 4-1 and 4-2 [APP-128]**. The methodology adopted in the assessment of cumulative effects, including the Zone of Influence (ZOI) and the projects considered in the long listing and shortlisting process were all agreed with the host authorities (BBC, HDC and CCC) during both the informal and statutory consultation phases, as evidenced in **ES Vol 1 Chapter 17 [APP-053]**. The Applicant is satisfied that the methodology, ZOI and cumulative site identification process is acceptable and robust. The Applicant continued to monitor development schemes within the ZoI to ensure that the long list, short list and assessment of cumulative effects were up to date upon submission of the DCO. The final list and associated assessment of effects are set out in **ES Vol 1 Chapter 4 [APP-040]**. The sites that were ultimately shortlisted by the Applicant for cumulative assessment comprise: • Scheme 4: High Wood Solar Farm • Scheme 23: Cobholden Farm Solar Farm • Scheme 24: A428 Black Cat to Caxton Gibbet • Scheme 26: East West Rail • Scheme 28: Cobholden Farm BESS The detailed assessment of cumulative effects between the Scheme and the shortlisted sites was carried out in relation to Landscape and Visual Effects, Cultural heritage and Archaeology, Ecology and Nature Conservation, Hydrology and Flood Risk, Traffic and Transport, Noise and Vibration, Air Quality, Ground Conditions. Within the Relevant Representations and the subsequent LIRs received from the Host Authorities and Statutory Bodies, no concerns have been raised regarding the methodology that has been adopted for the assessment of cumulative

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	f) 25/01472/EIA - Land North Of Podington Road Between Midland Main Line And The Wymington Deviation Line, Podington Road, Wymington, Near Rushden NN10 9FT - Full Planning Application for the construction and operation of a temporary solar farm (with an operational phase of up to 40-years) with associated infrastructure; ecological enhancements and landscaping works; creation of, and alterations to, vehicular access; and other associated works (pending consideration).	effects, the extent of the ZoI, or the conclusions of the Cumulative Effects assessment (set out in ES Chapter 17 **[APP-053]**). The only comment is from any of the Host Authorities are requests from both BCC and HDC to consider additional sites in the assessment. In response to those comments, the applicant has updated the long list of sites for consideration on the cumulative effects assessment. A first update was submitted at Deadline 1 (April 7th) **[REP1-015]** and a further update has been prepared for submission at Deadline 2 (28th April) to reflect the latest suggestions. This process necessitated the preparation of a revised long list of sites with associated assessment and identification of any other sites for shortlisting. It has not identified any sites within the ZoI for shortlisting / detailed assessment. Thus, the assessment of Cumulative Effects within the submitted documents remains valid and unchanged. The Applicant will continue to monitor sites for inclusion in the assessment until a decision is made on the DCO.
21.2	[APP-053] Cumulative and in Combination Effects - para7.3.2 reference should be made to Table 17.2 otherwise the chapter is considered to be accepted as read subject to issues raised when cross-referencing with technical input.	The Applicant notes this comment. The Council is correct that paragraph 17.3.2 of **ES Vol 1 Chapter 17 Cumulative and In-Combination Effects [APP-053]** should refer to table 17.2, instead of table 17.3.
22.1	As part of the DCO Application the Applicant has set out: • [APP-006] Programme Document - a summary of the seven main issues / risks identified by them associated with the Proposed Development; • [APP-031] Planning Statement Table 3 – Proposed Development benefits with associated weighting; • [APP-031] Table 4 – Adverse effects of the Proposed Development with associated weighting; and,	Please refer to the Applicant's Response to BBC LIR paragraph 6.14 above.

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	• [APP-031] para 8.3.51 to 8.3.54 set out their Summary of Planning Balance. • [APP-038] The Proposed Development – Design Principle 7 '*The Proposed Development will seek opportunities to leave a positive legacy through the delivery of multiple social and environmental benefits'* – in light of the fact that the Application is temporary, this Design Principle should acknowledge such and set-out what mitigation and enhancement measures identified are to be made permanent and hence form a '*positive legacy'.* This should then be weighed accordingly. At this stage in the Examination, and in light of the aspects and matters, the Council reserves the right not to comment on the matters set out in a) to e) above, suggesting that these will emerge as part of the Examination.	
23.1	In preparing this Local Impact Report, and following the Pre-Examination Hearing (17-18 March), several fundamental and significant issues are tabled by the Council for consideration by the Examining Authority; namely:	Noted.
23.2	**Replacement Phase:** it is noted that there is no comprehensive, stand-alone assessment of impact and potential harm(s) created by the Replacement Phase, which then relates to a separate tier of Management Plans. While the Applicant states that the impact will be no-less than that of the Construction Phase, the very nature of the replacement of infrastructure elements; required haul routes; work force; work force vehicle movements and accommodation; noise and air quality impacts; and, the potential impact on instated hedgerows and culverts is not tabled for assessment and mitigation. It is suggested that this requires address.	The assessment of the replacements is considered as part of the assessment for the operational phase of the Scheme. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken and is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects that could result from a major replacement campaign, and the embedded mitigation measures the Applicant is proposing. The Applicant expects the Technical Note to be ready for examination Deadline 3.

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23.3	**Construction traffic**: it is suggested that there needs to be clarity as to what is meant by the term 'construction traffic' in that this would be vehicle traffic generated across the Construction, Replacement and Decommissioning Phases, rather than construction traffic generated solely within the Construction Phase. The Applicant should clarify that each phase has been assessed accordingly.	The Applicant principally uses the term 'construction traffic' in relation to the traffic generated during the construction phase of the Scheme. The Applicant considers that each phase of the Scheme has been adequately assessed in relation to traffic and transport. This includes the Technical Note that has been prepared by the Applicant for submission at Deadline 2 which specifically considers a substantial replacement phase scenario including the traffic impacts. If there are any specific uses of the term 'construction traffic' across any of the application documents that BBC would like clarified then the Applicant invites them to set these out in a table and we will be happy to review and respond.
23.4 - 23.5	**Enforcement:** there is concern expressed by the Council that the Application relies on strategies and measures as tabled within the Management Plans to mitigate harm while not addressing how the local planning authorities are going to resource the monitoring of these Management Plans over circa 776 hectares over 40-years. Where necessary, the Council has suggested Monitoring Fees should be included, potentially through s106 Agreement(s) with the three Host Authorities. Currently as presented, the Council considers that the Applicant has not provided sufficient clarity, specificity, and actual commitment (i.e. could vs shall) for the Council to consider that there are adequate measures contained within the Applicant's control documents to manage and mitigate the effect/ harm identified.	The Applicant recognises there would be a burden of monitoring and enforcement on the Host Authorities, but considers that a s106 agreement would not be appropriate in this instance. The Applicant suggests that a framework Planning Performance Agreement covering the post-consent phase would provide an appropriate mechanism to ensure that the host authorities have adequate resources to monitor and enforce the requirements of the Scheme. The Applicant considers the commitments made in the framework of outline management plan documents to be appropriate for this stage of the project and consistent with the proposed mitigation measures included in the Environmental Statements and requirements within the draft DCO [REP1-005]. A degree of flexibility is inevitably required in outline documents to cover different eventualities at the detailed design stage once a contractor is appointed. The host authorities, in consultation with key stakeholders, are required to approve the various outline management plans prior to different phases of works commencing on site, and the Applicant considers that this provides suitable and sufficient control for the host authorities to agree the final wording of the management plans before impacts could occur.

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		If there are any specific commitments that BBC considers need to be strengthened, then the Applicant invites them to set these out in a table and we will be happy to review and respond.
23.6	**DCO Agreement:** further to the matter above, the Council is not in agreement with the DCO Agreement in-principle as currently tabled, and with the extensive CPO etal as currently requested. In this regard, the Host Authorities has instructed legal representation to review the Agreement to enable a detailed discussion with the Applicant.	The Applicant notes that the draft DCO is not an 'Agreement' which would imply that the Order has a contractual status. The draft DCO, if made, is a statutory instrument and becomes legislation rather than an agreement between two (or more) parties. The Applicant disagrees that the compulsory purchase powers that would be authorised by the DCO are 'extensive'. For context and as set out in the Applicant's **Statement of Reasons [PDA-007]**, the Applicant seeks compulsory acquisition powers in the form of acquisition of new rights and temporary possession for only 8% of the land within the Order limits, the majority of which relates to the area surrounding National Grid's Eaton Socon Substation. The Applicant's Statement of Reasons sets out the Applicant's case justifying that there is a compelling case in the public interest and is able to justify the need for each of the plots over which compulsory acquisition powers are sought. The Applicant is consulting with the host authorities' legal representation in relation to the drafting of the DCO
23.7	**Post-Examination design resolution:** it is noted by the Applicant that, post-Examination, detailed design resolution and approval(s) will be required, in some cases involving the discussion, resolution, and agreement between three local planning authorities and statutory consultees (Environment Agency, National Highways) – how this is engaged, concluded, and funded needs address within the Examination.	The Applicant would be required to submit applications to the relevant council to discharge the requirements; the procedure for this is set out in Part 2 of Schedule 2 of the **draft DCO [REP1-005].** The Applicant would be required to make separate or parallel applications to each relevant host council for the phase within its area, unless the requirement or application relates only to land in one authority's area. Note that the draft DCO does not include a 'lead authority' type mechanism.

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		Requirement 22 of the **draft DCO [REP-1-005]** provides that where the local authority is required by the Order or other statute to consult with another person or body prior to discharging a requirement, the Applicant must consult with any such person before making an application to discharge a requirement. This requirement ensures that technical engagement takes place before a submission is made to the council, and will also reduce the burden on the council. As set out in the 'Planning Act 2008: Infrastructure Planning (Fees) Regulations 2010 - cost recovery by the Planning Inspectorate and public authorities', relevant statutory environmental bodies such as the EA, Natural England, Historic England and National Highways can recover their costs. As set out in Paragraph 27 of Part 2 of Schedule 2 of the **draft DCO [REP1-005]**, where an application to discharge requirements is made to the relevant authority, the applicant must pay the requisite fee to the local planning authority. Schedule 2, Part 2 of the **draft DCO [REP1-005]** defines the relevant authority, requires decisions to be made within eight weeks unless a longer period is agreed, provides a structured mechanism for requesting further information, and includes a deemed approval provision where the relevant authority does not determine an application within the relevant time. It also provides an appeal route to the Secretary of State where consent is refused, granted subject to conditions, or delayed, or where unnecessary further information is sought. The approach taken by the Applicant is well precedented in other made DCOs and in accordance with relevant guidance on drafting.
23.8	**Clarity of Matters:** it is suggested that most of the Matters raised in this report requires clarity and resolution by the Applicant which can be resolved between Parties.	The Applicant notes this comment and is working proactively to provide clarity on each of the 'matters' raised, as requested by BBC.
23.9	**Positive impact:** it should be noted that where a Matter has been assessed as potentially having a positive impact, this is subject to a commitment/ strategy put in place by the Applicant/ landowner post the Decommissioning Phase that retains the mitigation and	The Applicant notes this comment but does not necessarily consider it to be an appropriate approach. The benefits of a Scheme are not necessarily contingent on those benefits being provided 'in perpetuity' once the Scheme is decommissioned and ended. It is acceptable for benefits to be recognised even

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	enhancement measures as put in place in perpetuity - the Council's position is consequently a caveated statement.	where such benefits may be time-limited; the weight given to such positive benefits in the planning balance is surely the pertinent matter rather than whether they are positive.
23.10	**Planning benefits:** it is suggested that the planning benefits of the Application cannot be ascertained until such time as the Applicant clarifies the very nature of 'temporary' and what elements instated by the Proposed Development will be retained by the landowners post the Decommissioning Phase. It is suggested that the habitats created, the Skylark grasslands, and permissive routes if adopted as PRoW, could form a significant ecological and human wellbeing element of the Proposed Development creating a lasting, permanent legacy.	The Applicant considers the temporary and permanent components of the Scheme are clearly defined within **ES Vol 1 Chapter 2 The Scheme [APP-038]**, supported by the framework of environmental management plans. The Applicant has provided clarifications to a number of matters raised by BBC on the decommissioning phase within Table 1 of the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
23.11	In conclusion, the Council remains open to continued discussions with the Applicant, the other Host Authorities, and the Examining Authority during the Examination period to review, clarify, and resolve the Matters as raised in the Relevant Representation report and assessed in the Local Impact Report.	The Applicant notes the comments raised by BBC in relation to suggested amendments to the **draft DCO [REP1-005]** and will continue to engage with BBC and its legal representatives to discuss and agree the most appropriate position in respect of each one of the issues raised in their Local Impact Report
APP 1	APPENDIX 1: Acquisition of Rights of Affected Public Rights of Way (PRoW) and temporary possession of the Public Highways Ref. Applicant's consultant (CBRE's email 18 Feb 2026)	In relation to the extent of land over which the Applicant seeks to acquire new rights compulsorily, the Applicant would like to point out to the explanation set out in the **Statement of Reasons [PDA-007]** in relation to this. The powers to acquire new rights are sought in respect of on-road cable routes to the extent that any cabling for the on-road route is laid at a depth ***beneath*** the strata of land comprising publicly adopted highway. The Applicant does not seek to acquire any rights over public highways because this is not possible and it is also not necessary. This is because in certain instances, there is uncertainty regarding the depth of the highway strata (or public highway) for the proposed cabling works. These powers are required to accommodate the installation, inspection, maintenance, and replacement of underground electrical cabling forming part of the authorised development. While the Applicant anticipates that the majority of cabling will be installed within the adopted highway corridor, there remains

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		uncertainty as to the precise depth and extent of existing highway strata and statutory undertakers' apparatus. The Applicant therefore seeks compulsory purchase powers as a contingency provision for plots where there is uncertainty on depth, in the event that any cables are required to be installed beneath the extent of the existing highway strata. The extent of compulsory acquisition powers sought by the Applicant is a separate issue from the powers sought under the **draft DCO [REP1-005]** in relation to works to streets and public rights of way. Part 3 of the draft DCO (which includes Articles 10 to 17) includes provisions relating to streets, public rights of way, access and traffic regulation, and must be read alongside Schedules 4 to 8, which include details of the relevant streets works, works to PROWs, and accesses and traffic regulation orders. The articles within this Part allows the undertaker Applicant to carry out certain street works which would otherwise require authorisation a separate consent, which are all consolidated in a single statutory instrument, as envisaged under the Planning Act 2008 regime. However, the provisions within the draft DCO made it clear that the final detail and extent of the works must be submitted to and approved by the streets authority or highways authority. On the basis of the conditionality of the powers contained in the draft DCO to carry out works on streets and public highways, the Applicant's position is that a Section 278 as such is not necessary at this stage to authorise works over the public highway. By way of example, the main protections secured by the draft DCO are as follows: • **Article 11 (Application of the 1991 Act)** – This article applies the provisions of Part 3 of the New Roads and Street Works Act 1991 ("NRSWA 1991") to works that would qualify as major highway works. Additionally, the article ensures that the exercise of Article 10

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		(Street works) and Article 15 ((temporary stopping up of streets and public rights of way) are subject to the provisions of the NRSWA 1991 specified in Article 11(4). • **Article 13 (Construction and maintenance of altered streets)** – This article ensures that alterations to streets must be completed to the reasonable satisfaction of the relevant highway authority, among other measures. • **Article 16 (Agreements with street authorities)** – This article allows the Applicant to enter into agreements with the street authority in relation to various matters, including the carrying out of works in a street under Article 10(1) (Street Works) or Article 14 (Access to works). • **Requirement 3 (Detailed design approval)** – This requirement provides that for each phase of the authorised development, details of the layout, scale, proposed finished ground levels, fencing, external appearance, and vehicular accesses must be submitted to and approved in writing by the local planning authority before the commencement of that phase. As such, the detailed design of the Scheme will be subject to the approval of the local planning authority. • **Requirement 5 (Construction environmental management plan)** – This requirement provides that no phase of the authorised development may commence until a construction environmental management plan ("**CEMP**") for that phase has been submitted to and approved by the local planning authority in consultation with the Environment Agency. The CEMP submitted be in substantial accordance with the **outline CEMP [REP1-032]** to the extent applicable to that phase. [The outline CEMP includes at Table 5.5 details of measures to remedy damage to the highway caused by construction traffic, including pre-construction and post-construction surveys.] • **Requirement 8 (Construction traffic management plan)** – This requirement provides that no phase of the authorised development may commence until a construction traffic management plan ("**CTMP**") for that phase has been submitted to and approved by the local planning authority

Para Ref.	BBC Local Impact Report Comment	Applicant Response
		in consultation with the Highways Agency. The CTMP submitted be in substantial accordance with the **outline CTMP [REP1-034]** to the extent applicable to that phase, which includes a number of measures relating to local highways. [For example, Section 5 of the management plan set outs details of the proposed construction access strategy, including situations where the design of accesses will be agreed with the local highway authority post-consent]. • **Requirement 11 (Public rights of way)** – This requirement provides that no phase of the authorised development may commence and no decommissioning may be undertaken until a public rights of way management plan ("**PROWMP**") has been submitted and approved by the local planning authority in consultation with the relevant highway authority. The PROWMP submitted must be in substantial accordance with the outline PROWMP to the extent applicable to that phase.
APP2	**DCO AGREEMENT: SCHEDULES 2 AND 3** In addition to the points raised in the LIR, this is a provisional review of [APP-016] DRAFT DCO Agreement Schedule 2 and 3. The Council notes that the Host Authorities have instructed legal review of the DCO Agreement and consequently the review below should be read as the Council's working position rather than as a definitive position.	The Applicant notes the comments raised by BBC in relation to suggested amendments to the **draft DCO [REP1-005]** and will continue to engage with BBC and its legal representatives to discuss and agree the most appropriate position in respect of each one of the issues raised in their Local Impact Report.

3.0 RESPONSE TO CAMBRIDGESHIRE COUNTY COUNCIL'S LIR

Table 2: Response to Cambridgeshire County Council's Local Impact Report (REP1-075)

Para Ref.	CCC Local Impact Report Comment	Applicant Response
1.2.5	The Council considers a further phase of works needs to be accounted for, the at scale replacement of PV panels and batteries. Both are anticipated to need replacing at a point during the operation of the scheme. In doing so this will be a further phase similar to construction with the need for employment, deliver of new equipment as well as the removal and processing of redundant PVs and batteries. The impact to the local communities will be significant over this time. For the purposes of this LIR, impacts by the at scale replacement of PVs and batteries is included as part of operation as currently defined in the application.	As set out in response to Matters 2 and 3 of the BBC LIR, the Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken and is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects that could result from a major replacement campaign, and the embedded mitigation measures the Applicant is proposing. The Applicant expects the Technical Note to be ready for examination Deadline 3.
1.4.1	Statutory Development Plans The Planning Inspectorate guidance on preparing LIRs suggests that it is useful to set out relevant local plan policies and provide an appraisal of the proposed projects compliance to policies.	The Applicant agrees that this is the relevant Local Development Plan.
1.4.2	Huntingdonshire District Council Local Plan For the part of the project in Cambridgeshire, the relevant development plan is the Huntingdonshire District Council Local Plan. (Note an updated version to 2046 is currently being drafted). Details of the relevant development local plan policies are detailed in Huntingdonshire District Council's LIR. Where appropriate reference is made to specific development local plan policies in section 2, impacts by issue, of this LIR.	
1.4.3	Cambridgeshire County Council is the planning authority responsible for minerals and waste in Cambridgeshire. The Cambridgeshire and Peterborough Minerals and Waste Local	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	Plan (MWLP) 2021 can be found in Annex 2 of this LIR. Relevant policies are detailed and referred to in the appropriate sections of this LIR.	
1.5.1	Cambridgeshire County Council Vision and Strategic Framework 2026-27 The Strategic Framework 2023-2024 sets out CCC's vision and corporate ambitions. It is approved by the Full Council of its democratically elected joint administration. All Council decisions and policies are made within the context of this Framework.	The summary of relevant documents by the Council is noted by the Applicant The Applicant's approach to supplementary planning and other strategy and guidance outside the Local Development Plan is set out in paragraph 3.13 of the Apploicant's response to BBC's LIR.
1.5.2	CCC's Strategic vision is for a: "A healthy, fair and sustainable Cambridgeshire." The Strategic Framework guides how the council plans, prioritises and allocates resources in the coming years, ensuring a continued focus on core duties while investing in long-term improvements for communities across the county.	
1.5.3	To deliver this vision, the Council will, be focussed on three ambitions: • Support a green and sustainable county • Enable full, healthy lives for all • Ensure fairness and opportunity wherever we can	
1.5.4	CCC's Climate Change and Environment Strategy 2026-2028 (published January 2026) This Strategy outlines CCC's vision in relation to climate change and environment and informs all of the Council's work. It is available to view in full on the County Council's public-facing website. It: *"…sets out an ambitious plan to cut emissions, strengthen resilience, and restore natural ecosystems - while ensuring every action delivers real health and wellbeing benefits for our communities…Cambridge is a globally recognised city, and this reputation delivers significant economic benefits both across Cambridgeshire and nationally. While it leads the way in cutting-*	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	edge technology and innovation, the vision for Cambridge is also to be a clean, green, and modern hub. At the same time, the Fens play a vital role in national food production and are a cornerstone for agritech innovation, making the region essential for both food security and future farming technologies To attract businesses and industries, we must offer an environment that is not only innovative but also vibrant, sustainable, and a great place to live. This Strategy is about safeguarding our future. It is about ensuring Cambridgeshire remains a place where people and nature can succeed together. We will lead by example, but we cannot do it alone - everyone has a role to play."	
1.5.5	The Strategy outlines the councils ambition to deliver "net zero carbon emissions for Cambridgeshire by 2045 while supporting our communities and nature to adapt and thrive as the climate changes". The council aims to achieve this through: Improving Services: We're making our services more efficient, climate-friendly, and resilient: saving money, reducing emissions, and preparing for future climate impacts. This includes better use of our buildings and resources, supporting colleagues with the right tools, training, and equipment, and embedding climate adaptation into service planning to build long-term resilience. Enhancing Health and Wellbeing: Well designed and delivered climate and nature action can mean warmer homes, cleaner air, and more green spaces. We're backing projects like home energy efficiency retrofits, community energy and nature-based solutions that improve everyday life. Supporting Local, sustainable Growth: We're helping to shape a local economy that's low carbon and future-ready. Projects like the energy infrastructure planning will support greener homes, businesses, and transport - ensuring we can meet future energy demands, provide lower cost energy and energy security while bringing opportunity for Cambridgeshire businesses.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	Working in Partnership: We can't do this alone. We're working with local voluntary and charitable groups, businesses, and the wider public sector locally to share ideas, pool resources, and deliver real change – together	
1.5.6	Cambridgeshire Green Infrastructure Strategy (2011) This Strategy is designed to assist in shaping and coordinating the delivery of green infrastructure in the County to provide social, environmental, economic benefits now and in the future. This Strategy demonstrates how Green Infrastructure can be used to help achieve four objectives: To reverse the decline in biodiversity To mitigate and adapt to climate change To promote sustainable growth and economic development To support healthy living and well-being	
1.5.7	*"Green Infrastructure is part of our natural life-support system. It is the network of natural and man-made features such as open spaces, woodlands, meadows, footpaths, waterways, and historic parks, which help to define and to link the communities, villages, towns, and cities of Cambridgeshire with each other and to the surrounding landscape. Green Infrastructure is vital to quality of life for both existing and future residents of Cambridgeshire and is nationally acknowledged as an important element of well-designed and inclusive places."*	
1.5.8	Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy3 (HWICS) The HWICS sets priorities to benefit health and wellbeing for residents. In 2022, Cambridgeshire County Council and Peterborough City Council agreed to form a Joint Health and Wellbeing Board. It collaborates with the Integrated Care Partnership, bringing together and creating a stronger local partnership around integrated health and social care.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
1.5.9	The overarching mission of “All together for healthier futures” is supported by three overarching ambitions: Have better outcomes for our children; Reduce inequalities in deaths under 75 years; and increase the number of years that people live in good health.	
1.5.10	The four priorities of the HWICS are: Ensure our children are ready to enter education and exit, prepared for the next phase of their lives Create an environment to give people the opportunity to be as healthy as they can be Reduce poverty through better employment, skills, and housing Promote early intervention and prevention measures to improve mental health and wellbeing	
1.5.11	Cambridgeshire and Peterborough Local Transport and Connectivity Plan (LTCP) The Cambridgeshire and Peterborough Combined Authority (CPCA) are the Strategic Transport Authority for Cambridgeshire and Peterborough, and the Local Transport and Connectivity Plan (LTCP) is the Combined Authority’s long-term strategy to make transport in Cambridgeshire and Peterborough better faster, greener, and more accessible for everyone.	
1.5.12	The LTCP sets out a vision and goals for how transport supports a better future and describes the projects needed to make that new future possible. This includes things like better buses, more train services, less pollution and carbon emissions, and helping more people to cycle and walk.	
1.5.13	Cambridgeshire County Council Rights of Way Improvement Plan (2016 Update) The Rights of Way Improvement Plan (ROWIP) is a statutory document under the Countryside & Rights of Way Act 2000, which forms part of the CPCA’s Local Transport Plan 3 (LTP3). The Plan	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	is a strategy document that contains the vision of improved countryside access in Cambridgeshire and builds on the rights of way network to bring benefits to transport, tourism, the rural economy, social integration, health, and the environment.	
1.5.14	The ROWIP recognises that demand for access to the countryside is growing and is becoming increasingly important due to its importance to the rural economy, public health and well-being and place-making as well as the significant contribution that the PROW network makes to the active travel agenda. Delivery of the Plan requires a range of functions and organisations to work in partnership to achieve the strategic plans of the ROWIP in co-ordination with the emerging Active Travel Strategy and the LTP3.	
1.5.15	The ROWIP's Statements of Action (SOAs) are intended to protect and bring about improvements to the rights of way network and countryside access. The following key SOAs are relevant to this Application: • SOA2: A safer and health-enhancing activity: Countryside access provision should be safe for users and encourage healthy activities. • SOA3: 72,500 new homes: new development should not damage countryside provision. Where appropriate, development should contribute to the provision of new links and/or improvement of the existing PROW network. • SOA5: Filling the gaps: Countryside provision should build on the platform of the historical network to meet the needs of today's users, particularly equestrians, and land managers.	
1.5.16	The ROWIP works in partnership with the existing Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
1.5.17	The Defra 25 Year Environmental Plan (D25YEP) The D25YEP sets out the Government's plan to improve the environment within a generation, including details how this is to be achieved. It is this Government's ambition to leave our environment in a better state than we found it. The 25 Year Environment Plan outlines the steps we must take to achieve the ambition. The policies in Chapter 3 concern connecting people with the environment in order to improve health and wellbeing, they seek to enhance people's engagement with the natural world and to address inequalities in access, by opening up the mental and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds.	
1.5.18	The Covid pandemic has underlined the important role of nature for our health and wellbeing, particularly for those living in disadvantaged areas, and there is growing evidence to support the many beneficial effects of being outside, including reducing stress and increased physical activity. The relevant actions and outcomes detailed in Chapter 3 include: *"1. Helping people improve their health and wellbeing by using green spaces;* *2. Encouraging children to be close to nature, in and out of school; and,* *3. Greening our towns and cities."*	
1.5.19	Through increased engagement with nature, people come to care more about the natural environment and take steps to protect and enhance it. Delivery of the D25YEP outcomes depends upon engaging people with nature and supporting their behaviour change. Through engagement with the local community and provision, the proposed solar energy project has the opportunity to help address the requirements of the Plan.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.1.1	Landscape and Visual (ES Chapter 5 Landscape and Visual) The Proposed Development will have a significant adverse impact on the landscape and visually amenity. Whilst Huntingdonshire District Council will be commenting on this in detail, Cambridgeshire County Council's comments under PROW (see paragraph *** of this LIR) address the impact to non-motorised users using the local PROW network.	The Council's position on this matter is noted. The Applicant has responded to both BBC's and HDC's comments on the Landscape and Visual Impact assessment within the LIR's.
2.2.1	Historic Environment (ES Chapter 6 Cultural Heritage and Archaeology) The Council expects that any physical impacts or potential physical impacts on archaeological assets be mitigated appropriately, via preservation in situ, or if that is not possible or practicable, preservation by record/archaeological excavation. The applicant's Environmental Statement does take into account the results of all phases of survey, including geophysics and trial trenching, and includes an outline of how impact on assets can be appropriately mitigated, although the Council's assessment of the proposed approach to mitigation in some areas differs from the applicant's (see paras 2.3.4.1 – 2.3.4.3 of this LIR). All mitigation needed should be secured by an appropriate requirement, to require an Archaeological Mitigation Strategy (AMS) based on the submitted outline AMS [APP-166].	The Applicant notes and welcomes the Council's comments.
2.2.2	The proposed order limits contain archaeological remains of national significance. Impact on these remains should be completely avoided. The Council notes that a proposed temporary access road crosses the scheduled monument of the Roman town at Great Staughton, and, while the construction method is deigned to avoid impact on the archaeological remains, we retain concerns with regard to some impact in the construction phase.	As set out in detail in the Applicant's response to **CCC-RR-02 [REP1-055]** the Applicant acknowledges the Council's concern regarding the temporary access track proposed to cross the scheduled monument in Site C. In response, the Applicant has developed the outline method statement set out at paragraphs 7.3.32 to 7.3.41 of the **outline Archaeological Mitigation Strategy (oAMS) [REP1-048]** in a conservative manner based on engineering advice, approaches taken by other projects, and best practice guidance such as the 'Mitigation of Construction Impact on Archaeological Remains' (English Heritage, 2004).

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		The Applicant consulted with Historic England on the temporary access track method statement **oAMS [REP1-048]** in early August 2025. The Applicant understands from discussions with Historic England that their internal Scientific Adviser was consulted who raised no significant concerns regarding the proposed methodology, but noted that at the post-consent detailed design stage: "*We recommend that selection of the exact alignment of the route is additionally supported by the archaeological analysis to demonstrate that the route does no overlie any particularly vulnerable archaeological deposits (which have been identified so far). Final location of the temporary track will have to be agreed with Historic England*." To ensure that Historic England and the CCC archaeologist have 'sign-off' over the final location and design of the temporary access track, the **draft DCO [REP1-005]** includes Requirement 15(4) that prevents commencement of any phase (and site preparation works for that phase) until an archaeological mitigation strategy is approved by the local planning authority in consultation with Historic England and the county archaeologist. This provides the mechanism through which the Applicant can supply the further engineering detail requested by the council and have it formally approved. The Applicant notes that the oAMS also provides further controls to manage the risk of vehicle movements, including at paragraph 7.3.36 **[REP1-048]** provision of drainage measures within the temporary sub-base to avoid increased run-off, waterlogging and erosion; at paragraph 7.3.37 **[REP1-048]** Heras fencing and banksmen to prevent straying and to avoid turning and passing within the scheduled area; and, at paragraph 7.3.38 **[REP1-048]** a speed limit and weekly inspections with provision to add additional protective measures should any rutting or instability be observed. With regard the depth of archaeology and the overburden above the potential archaeological horizon, the Applicant notes that the precise alignment of the temporary access road will be chosen following further archaeological investigation to minimise impact on any particularly vulnerable archaeological

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		deposits. If the depth of overburden is as low as 250mm (noting it is unlikely to be less given the history of ploughing across the land) then the total depth of overburden comprising existing soil and then the geo-grid laid aggregates would be approximately 400mm, with the matting system on top. **ES Vol 2 Appendix 13-1 Agricultural Land Classification and Soil Resources [APP-115]** includes soil samples at observation points 108, 109 and 110 in the area where the temporary access track will be laid. The soil data supports a ground model of cohesive, low permeability clay soils (including a clay topsoil horizon of approximately 0.28–0.37m thickness) that are potentially moisture sensitive, with wetness limitation present but not at the most severe classes. This suggests that some compression of the near surface clay topsoil is plausible, but on reasonable geotechnical assumptions it is likely to be in the order of a few millimetres but could be up to 20mm if the clay soils are particularly soft. In either case, the compression is in the top 50mm of the soil overburden and not extending down to 250mm below ground. Restoration of these soils post-construction is set out in paragraph 7.3.9 of the **oAMS [REP1-048]**. Similar temporary access solutions using trackway mats and load-spreading systems have been applied in the UK within scheduled monument contexts and have been supported at the detailed design stage by geotechnical assessment to demonstrate minimal compression effects. With these measures, and with the final detailed method statement to be confirmed through consultation with Historic England and the Cambridgeshire Historic Environment Team (CHET) as set out at Requirement 15(4) of the **draft DCO [REP1-005]**, the Applicant considers that the proposed temporary access track can be delivered in a manner that preserves the nationally significant archaeological remains of the Scheduled Monument in situ.
2.2.3	Huntingdonshire's Local Plan Policy LP 34 concerns Heritage Assets and their settings. It states that proposals need to demonstrate potential for any adverse impacts on the historic environment. Specifically with regard to Archaeology it states that fieldwork evaluation prior to	The Applicant agrees that this is the relevant local plan policy context in relation to this matter.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	determination may be required to support applications. Preservation in situ of archaeological remains should be ensured where appropriate and possible. If this is not possible provision must be made for comprehensive recording, analysis of the results and publication.	
2.2.4	Great Staughton Neighbourhood Plan 2021 to 2036 Policy GSNP10 – Designated and Non Designated Heritage Assets states that a development proposal affecting a heritage asset or its setting be accompanied by archaeological investigations where relevant, and in the event of significant and/or extensive remains being found they be preserved in situ.	
2.2.5	Construction Phase Impacts Positive Removing the area of the newly designated Roman Town at Great Staughton from arable farming and changing it to open grassland will positively impact the long-term preservation of the asset.	This is noted and the acknowledgement of this as a beneficial effect is welcomed.
2.2.6	Neutral Any areas of the development where proposed construction activities will have no physical impact on archaeological remains. These are likely to be limited to areas of open space within the order limits.	The Applicant notes these comments
2.2.7	Negative Construction that involves any ground disturbance within the order limits, such as piling for solar arrays, cable trenches, the Battery Energy Storage System (BESS) site, the substation, the cable connection, internal cabling and ancillary infrastructure including access tracks/roads, construction compounds and laydown areas, green infrastructure including tree planting, SuDs and site clearance, has the potential for negative impact on archaeological assets where they exist. The scale of that impact may vary from negligible to major depending on the nature of the activity.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	Chapter 2 of the ES [APP-038] provides details of the proposed works.	
2.2.8	While each pile for a solar PV array is small in size the cumulative effect of thousands across a development site is poorly understood and not fully documented or assessed, due to the lack of decommissioned solar farms available to study. Piling tends of have a proportionately lower impact on large archaeological features such as enclosure ditches, but theoretically a comparatively higher impact on human remains, ephemeral prehistoric pits/posthole, structural remains, or waterlogged remains. Table 2-1 of the ES [APP-038] provides details on construction, including that the piles will be up to 3m deep. Centralised inverters and solar transformers will have strip foundations of up to 0.4m below ground level (Table 2-3 & 2-4) [APP-038],	
2.2.9	Excavation of cable trenches will normally reach the depth of the underlying archaeology and can have a major impact, particularly where they are closely grouped together. Table 2-20 [APP-038] shows that cable trenches will be up to 1m deep, with a single circuit up to 0.4m wide. Additional circuits can be laid in parallel in a trench up to 15m wide. This would have a major impact on any in situ archaeological remains.	
2.2.10	Construction of structures such as the BESS will normally involve a topsoil strip, regrading/levelling of land, service trenches and foundations, all of which can have a major impact on archaeological remains. Tables 2-5 to 2-16 [APP-038] detail these impacts, including internal services and roads, all of which indicate major construction impact within the footprint of these works. The BESS also includes a drainage lagoon (Table 2-29)	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	[APP-038] which is likely to cause considerable impact on any in situ archaeological remains.	
2.2.11	The 400kV cable connection to Eaton Socon substation will be constructed in a maximum 1.5m wide trench with a depth of at least 1m (Table 2-17, [APP-038]). This will have a major impact on archaeological remains within its footprint.	
2.2.12	Fencing around solar PV areas will have construction impact localised to foundations for posts – these will be a maximum depth of 1m below ground level (Table 2-23) [APP 038]. Whether that impact is of concern or not depends on the density and significance of any archaeological remains in that area.	
2.2.13	Access tracks will involve a topsoil strip of up to 0.25m (Table 2-25). This is shallower than the depth of the archaeological remains in most areas, but removes protection from any such remains, putting them in danger from compression damage from traffic/heavy machinery etc. This is also true of temporary access tracks even though no excavation is proposed (Table 2-26) [APP-038], particularly in wet weather. The temporary access track proposed to cross the scheduled monument in Site C is in an area of very shallow, nationally significant archaeological remains. While the construction technique used is likely to minimise impact, the applicant should provide more information as per the Council's Relevant Representations [RR-150] paragraph 4.2.	
2.2.14	Temporary construction compounds will be constructed on matting (Table 2-31, [APP-038]) but could have impact from compression in areas of significant, sensitive or shallow archaeology.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.2.15	Tree planting, and other works to create Green Infrastructure (2.4.153, [APP-038]), can have a major impact on archaeological remains, depending on the species and density of planting, and whether seedlings/mature trees are being planted.	
2.2.16	Mitigations required: The applicant has proposed a series of mitigation approaches in Chapter 6 of the ES [APP-042]. The Council is broadly in agreement with the Areas of Archaeological Constraint proposed in Sites C and D, with a few exceptions/comments listed below.	The Applicant welcomes the broad agreement with the Council on these matters.
2.2.17	The applicant has provided an outline Archaeological Mitigation Strategy (oAMS) [APP-166], and Outline Heritage Enhancement Strategy (oHES) both of which are secured through Requirement 15 and 16 respectably. Furthermore Requirement 15 also states the need for a Written Scheme of Investigation (WSI) for each phase. The Requirements secures full implementation of those strategies, with the below proposed modifications to the Archaeological Mitigation Strategy: Two cremation burials, most likely related to the Roman town, were uncovered in T803 in the Site C trial trenching. Further remains in T804 and T808 might indicate the presence of at least one burial enclosure in this area. See details in [APP-089]. This is covered by AAC-C-4 (preservation in situ) and AAC-C-5 (archaeological excavation – strip, map and sample). The applicant should provide details in the oAMS of where the projected extent of any burials might be in this area, and if uncertain, address how certainty would be improved. Further intrusive investigation may be needed in this area, post consent, to define the area of burials. A degree of flexibility should then be built into the mitigation strategy for AAC-C-4 in particular, pending the results of any trenching, as concrete blocks may not be appropriate in an area of Roman burial.	The Applicant notes the Council's comments that the evaluation trenching undertaken to date only represents the first phase of trenching and would highlight that the **oAMS [REP1-048]** notes that further stages of archaeological evaluation work should be completed, with paragraphs 5.3.1 and 5.3.2 **[REP1-048]** stating that: *the archaeological brief jointly issued by CHET and BBHET required two phases of archaeological investigation prior to construction. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken…the general aim of these investigations… is to more accurately establish the potential for the presence/absence of archaeologically significant remains allowing the mitigation measures set out in Section 6.0 to be applied appropriately.* The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, which in the first instance would involve the second phase of trial trenching which, as outlined in paragraph 5.3.1 of the **oAMS** [**REP1-048**] *'would be undertaken in line with archaeological brief jointly issued by CHET and BBHET'*. This second phase of trenching will be utilised in the area of AAC-C-4 and AAC-C-5 to further clarify the extent of the cremation burials in this area. The Applicant acknowledges the Council's comment that the utilisation of concrete blocks may not be appropriate in areas containing cremation burials. It is understood that the **oAMS [REP1-048]** will require multiple reviews alongside the Scheme design dependant on the results of further archaeological works.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		A final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the **oAMS [REP1-048]** prior to commencement of any phase of the authorised development, as per Requirement 15(4) of **draft DCO [REP1-005]**. The final AMS must be approved by the relevant council in consultation with the county archaeologist and Historic England. The Applicant's approach is entirely aligned with the approach being advocated by the Council.
2.2.18	Archaeological monitoring is proposed as a potential mitigation measure for cable routes in the oAMS (para 6.2.4). This can only ever follow, and we are likely to find it an inappropriate mitigation method in any but low areas of archaeological potential/complexity, due to the low quality of archaeological investigated often necessitated by working alongside construction works. It should be clear in the oAMS that archaeological monitoring is a mitigation strategy of last resort, to be used only in exceptional circumstances.	The Applicant acknowledges the Council's comments that archaeological monitoring may not be an appropriate strategy along the cable routes and that intrusive trial trench evaluation will be required in the first instance within these areas. The Applicant notes that the evaluation trenching undertaken to date only represents the first phase of trenching and would highlight that the **oAMS [REP1-048]** notes that further stages of archaeological evaluation work should be completed, with paragraphs 5.3.1 and 5.3.2 **[REP1-048]** stating that: *the archaeological brief jointly issued by CHET and BBHET required two phases of archaeological investigation prior to construction. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken…the general aim of these investigations… is to more accurately establish the potential for the presence/absence of archaeologically significant remains allowing the mitigation measures set out in Section 6.0 to be applied appropriately.* The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, which in the first instance would involve the second phase of trial trenching which, as outlined in paragraph 5.3.1 of the oAMS [**REP1-048**] *'would be undertaken in line with archaeological brief jointly issued by CHET and BBHET'*. This second phase of trenching will be utilised to evaluate the potential of the cable routes prior to the Archaeological Mitigation Strategy being finalised. It is understood that the **outline Archaeological Mitigation Strategy** [**REP1-048**] will require multiple reviews alongside the Scheme design, dependant on

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		the results of further archaeological works. A final Archaeological Mitigation Strategy (AMS) must be prepared in substantial accordance with the **oAMS [REP1-048]** prior to commencement of any phase of the authorised development, as per Requirement 15(4) of the **draft DCO** [**REP1-005**]. The final AMS must be approved by the relevant council in consultation with the county archaeologist and Historic England.
2.2.19	Should there be any possible impact caused by the construction and use of the temporary access road across the scheduled monument in Site C, and programme of mitigation by record may be needed within its footprint. More details and evidence of the measures effectiveness to mitigate the risk of compaction below ground is needed to confirm that this will not be needed.	The matter has already been addressed in detail in the Applicant's response to paragraph 2.2.2 of CCC's LIR above.
2.2.20	Operational Phase Impacts Positive: Removing the area of the newly designated Roman Town at Great Staughton from arable farming and changing it to open grassland will positively impact the long-term preservation of the asset.	The Applicant notes and welcomes this comment.
2.2.21	Negative: Any maintenance work, in particular the replacement at scale of PVs and batteries that are expected to need replacing within the 40 years of the project, installation of new cabling, new or reinstatement of temporary construction compounds or new or reinstated temporary access roads during the operational phase could cause archaeological impact.	Please refer to the Applicant's response to Matters 2 and 3 of BBC's LIR which addresses this matter.

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2.2.22	Mitigations required: Recognising the replacement at scale of PV panels and batteries as a phase of development would under requirement 15 [PDA-005] mean the Archaeological Mitigation Strategy is required for approval by the local planning authority in consultation with the county archaeologist before works, or any associated site preparation works (including reinstatement of accesses etc.), commences.	
2.2.23	Decommissioning Phase Impacts Negative: Potential additional impact caused by removal of infrastructure from development site. As this will occur in 40 years' time, the exact methodology to be used for that removal is uncertain, indeed it is possible that the technology to be employed has not been invented yet.	The **oAMS [REP-048]** has been prepared for the construction, operation and decommissioning of the Scheme and its purpose is to manage archaeological remains "across the lifetime of the Scheme" (see paragraphs 1.1.1 and 1.1.3). It also includes a dedicated section entitled "7.5 Decommissioning Phase". Further to the provisions within the **oAMS [REP-048]** it is also relevant to note that the **oDEMP [REP1-038]** confirms that an Archaeological Mitigation Strategy is to be prepared prior to decommissioning, in substantial accordance with the outline Archaeological Mitigation Strategy.
2.2.24	Mitigations required: The Archaeological Mitigation Strategy for each phase of works (requirement 15, [PDA-005]) should include the decommissioning phase.	
2.3.1	Biodiversity (ES Chapter 7 Ecology and Nature Conservation) Summary The scheme will result in adverse impacts (particularly during the construction phase), including Huntingdon Wood County Wildlife Site / Ancient Woodland, priority habitat (woodland / hedgerow) and protected species (water vole, ground nesting birds, bats, great crested newt and arable flora). However, the level of impact is unknown due to lack of survey effort, detailed information and conflicting documents.	The Applicant notes this comment. However, the Applicant disagrees that the level of survey work, assessment and detailed information is insufficient. They have responded to each of the topics referenced by the Council below.

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2.3.2	The scheme will result beneficial impacts (operational phase) to biodiversity receptors, including delivery of (non-significant) biodiversity net gain and habitat for a range of protected species, including breeding birds, reptiles and amphibians. However, many of these benefits will be lost during decommissioning when the land is returned to agricultural and it will be important to secure retention of as much habitat of district / county importance or supporting notable species as possible. Although disappointingly, no management is proposed for veteran / ancient trees or in-channel enhancements to watercourse,	The Applicant notes that the land will predominantly be leased for the operational phase and, following decommissioning, will be returned to the landowners in accordance with the relevant commercial agreements. For that reason, the Applicant cannot provide an absolute commitment that all enhancements will be retained in perpetuity once the land has been handed back to landowners. It will be at their discretion what they subsequently do with their land. Notwithstanding the above, paragraphs 7.1.2 and 7.1.3 of the oLEMP [**REP1-040]** confirms that proposed native species woodland and woodland belt planting, proposed native species hedgerow planting, and proposed native species individual tree planting would be retained at decommissioning and handed back to landowners as mature landscape features. Paragraphs 7.1.4 to 7.1.6 **[REP1-040]** set out that other elements (including proposed grazing pasture or neutral grassland and species-diverse grassland, and ecological enhancement features) would remain on site at decommissioning but their future retention would be at the discretion of the landowners. It would not be the actions of the Applicant or the Scheme to remove such The **Planning Statement [APP-031]** makes clear that the benefits are only assessed as being delivered for the duration of the Scheme's operational lifespan. In particular, it records at paragraph 8.3.34 that the operational ecology benefits "*would be realised for the duration of the Scheme's operational lifespan (40 years)"*. The planning balance presented by the Applicant is therefore not contingent on permanent retention beyond decommissioning. Once the Scheme is decommissioned and removed, the Scheme-related effects which the mitigation and enhancements are designed to address will no longer arise; the planning weight therefore reflects the fact that both the harms and the associated mitigation and enhancement framework are tied to the operational lifetime, and that it would not be the actions of the Applicant or the Scheme to remove such enhancements following decommissioning. In the context of veteran trees, while direct works to established trees are not proposed, it is considered that the cessation of agricultural activities, including

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		reduced soil disturbance from tilling and cessation of application of fertiliser, pesticides and herbicides, is likely to result in incidental benefits to established trees. For example, the aforementioned agricultural activities are known to negatively affect mycorrhizal fungal networks.
2.3.3	Ecological receptors where the Council suggest that the ExA require the applicant to supply further clarification and/or information during the examination: • Huntingdon Wood County Wildlife site / Ancient Woodland • Habitats - including woodland, hedgerows and watercourses • Protected species - water Vole, ground nesting birds, bats, great crested newts • Notable species - arable flora, invertebrates • Biodiversity Net Gain	The Applicant notes this comment; detailed responses are provided below.
2.3.4	The Council suggests the proposed requirements be expanded to cover targets for Biodiversity Net Gain (subject to release of government guidance in May 2026)	The Applicant does not propose at this point to update the proposed BNG measures in light of recently published Government consultation response guidance[1] as to how BNG should be applied to NSIPs, which is applicable only to developments submitted after November 2026. However, it is noteworthy that based upon the information presented within the consultation, NSIPs would be expected to apply BNG in a significantly different way to Town and Country Planning Act developments, which has been used as the framework for the Applicant's BNG calculations to date. In particular, any retained areas of habitat not impacted would be excluded from the BNG boundary. In this case, this would likely mean that almost all hedgerow and watercourse would be excluded from the BNG baseline, significantly increasing the overall percentage gain delivered by the Scheme. While it is not fully clear how the precise NSIP proposals would be delivered, an indicative calculation has been provided below based on the exclusion of currently

[1] https://www.gov.uk/government/consultations/biodiversity-net-gain-for-nationally-significant-infrastructure-projects

<table>
<tr><th>Para Ref.</th><th>CCC Local Impact Report Comment</th><th>Applicant Response</th></tr>
<tr><td></td><td></td><td>retained habitats from the baseline. All habitat loss, creation and enhancement is still accounted for and is unchanged.

If the Scheme applied the BNG framework proposed for NSIPs, it is highly likely that all BNG targets would exceed 10% including those for watercourse units.

<table>
<tr><th></th><th>Habitat</th><th>Hedgerows</th><th>Watercourses</th></tr>
<tr><td>Current baseline</td><td>1,854.77</td><td>314.61</td><td>54.97</td></tr>
<tr><td>Retained units</td><td>266.31</td><td>312.92</td><td>39.87</td></tr>
<tr><td>NSIP baseline (baseline less retained units)</td><td>1,588.46</td><td>1.69</td><td>15.1</td></tr>
<tr><td>Post-development (excluding retained habitats)</td><td>3,032.32</td><td>117.82</td><td>18.38</td></tr>
<tr><td>Unit change</td><td>+1,443.86</td><td>+116.13</td><td>+3.28</td></tr>
<tr><td>Percentage change</td><td>+91%</td><td>+6,872%</td><td>+22%</td></tr>
</table></td></tr>
<tr><td>2.3.5</td><td>Policy Context
Huntingdonshire Local Plan
Huntingdonshire Local Plan 2019 policy LP-30 Biodiversity and Geodiversity seeks to protect and enhance biodiversity and geodiversity through the planning process, including protection of wildlife sites (statutory and non-statutory); retention, enhancement and creation of habitats and wildlife features; and measures to contribute to biodiversity net gain, reversing species declines and delivering local targets for nature.</td><td>The Applicant notes this comment and policy reference. This policy was considered by the Applicant in their PCD [as updated alongside this submission].</td></tr>
<tr><td>2.3.6</td><td>Local Nature Recovery Strategy
The Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS) was published by the Cambridgeshire and Peterborough Combined Authority on 23rd December 2025. Its</td><td>The Applicant notes this comment. The LNRS has been accounted for in the BNG report submitted at Deadline 1 [REP1-052].</td></tr>
</table>

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	sets out the priorities for nature recovery across Cambridgeshire and Peterborough, identifying LNRS priority habitats and LNRS priority species and targeted actions. A Local Habitat map has been produced to show the mappable measures for LNRS priority habitats, showing where habitats should be created or existing habitats enhanced. The delivery against these mappable measures as part of development is being incentivised through Biodiversity Net Gain (BNG) by categorising such habitat creation or enhanced of high 'strategic significance' leading to higher BNG scores within the statutory biodiversity metric.	
2.3.7	Construction Phase Impacts All construction impacts have been identified as either neutral or negative.	The Applicant notes this comment.
2.3.8	Negative: The scheme will, or has the potential to, have adverse impacts during construction on Huntingdon Wood Ancient Woodland / County Wildlife Site, priority habitats (woodland, hedgerows), ground nesting birds, roosting and foraging / commuting bats, great crested newts, water vole and arable flora. However, the level of impact cannot currently be determined due to lack of survey work, information, poor quality assessment and/or conflicting information.	The Applicant notes this comment but disagrees that survey work and the assessment carried out is insufficient or deficient. A detailed responses to the individual points raised are provided in response to CCC's LIR paragraphs 2.3.9 to 2.3.24 below.
2.3.9	The access track and cabling route (including 2.6m deep junction boxes) will be located in close proximity to Huntingdon Wood Ancient Woodland (irreplaceable habitat) / County Wildlife Site. Insufficient information has been provided to demonstrate how the scheme will not have a hydrological impact on the woodland, particularly given woods in Cambridgeshire are already becoming susceptible to drought / climate change.	The Scheme will be a minimum distance of 15m from Huntingdonshire Wood Ancient Woodland in line with Natural England and Forestry Commission standing advice. No impacts to Huntingdon wood are identified within the Arboricultural Impact Assessment **[APP-056].** The extent of the Scheme proposed near to Huntingdon Wood (well over 15m) is limited to the laying of a below ground cable linking the solar panels and BESS to the National Grid Substation.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		As set out in **ES Vol 1 Chapter 2 The Scheme [APP-038]** the works required within this part of the site would only comprise either trenching or directional drilling (under an existing watercourse that runs to the north of Huntingdon Wood), prior to cable installation and restoration. The works would be limited in both their extent (digging of trenches, installation of cable and backfilling of soil), depth (only 1-2m deep) and duration. They would also only be to one side of the wood and the laying of cable would be undertaken sequentially minimising the extent of work at any one time. **ES Vol 1 Chapter 12 (Ground Conditions) [REP1-011]**, confirms that available British Geological Survey (BGS) records within 1.5 km of the Order Limits report groundwater levels between 1.7 m and 7.62 m below ground level (bgl). Given the depth of groundwater in the area and given the limited extent and depth of the works and their offset from the wood, a breach of hydrological connection with the underlying groundwater is highly unlikely. Moreover, even if there were an effect, **ES Vol 1 Chapter 7 (Ecology and Nature Conservation) [APP-043]**, expressly states that Huntingdon Wood "*is not a habitat type that would be expected to be strongly influenced by hydrological conditions (i.e., is not a Groundwater Dependent Terrestrial Ecosystem)"* and that "*construction works in the vicinity of Huntingdon Woods CWS … would not be expected to influence the local hydrological regime"* . Given the standoff distances implemented and nature / extent of the works no hydrological impacts are expected to Huntingdon Wood CWS which, in any event, is not susceptible to changes in the hydrological regime.
2.3.10	The ES Chapter 7 [APP-043], and other documents states that all woodland and trees (priority habitat) will be retained, however this conflicts with the Illustrative Environmental Masterplan [APP-121] and Works Plan [APP-009] which show woodland being removed.	If there is an overlap between the **Illustrative Environmental Masterplan [APP-121]** and **Works Plan [APP-009],** which appears to show woodland being removed, it is likely to be a drafting error, the Environmental masterplan is illustrative and does not represent the final design for the scheme. As set out in the DCO submission, there would be very limited vegetation clearance as a consequence of the Scheme. Vegetation clearance is clearly stated in **Table 2-34 of ES Vol 1 Chapter 2: The Scheme [APP-038]**, which

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		confirms this would amount to 84m of hedgerow loss, 42m of which would be reinstated at the end of the construction phase. The indicative location of the limited vegetation clearance (woodland, trees or hedgerows) across the Scheme is shown on **ES Vol 3 Figure 2-6: Indicative Vegetation Clearance [APP-126]**. The commitment to avoiding tree loss is confirmed in Table 2 of the **Arboricultural Impact Assessment [APP-056]** and the **oCEMP [REP1-032]** includes specific provisions for construction to follow the recommendations of the Arboriculture Assessment. Accordingly, the Applicant can confirm that there will be no loss of trees in connection with the Scheme and that this will be secured through the **oCEMP [REP1-032]**.
2.3.11	The extent of hedgerow removal is unclear, given that some documents state hedgerows will be retained, while Illustrative Environmental Masterplan [APP-121] shows these hedgerows not being reinstated. It is also unclear if any 'important hedgerow' will be lost or impact of cabling within close proximity to species-rich hedge (Figure 2-1m, [APP-121])	Vegetation clearance is clearly stated in Table 2-34 of **ES Vol 1 Chapter 2: The Scheme [APP-038],** which confirms 84m of hedgerow loss, 42m of which would be reinstated at the end of the construction phase. The indicative location of vegetation clearance (hedgerows) across the Scheme is shown on **ES Vol 3 Figure 2-6: Indicative Vegetation Clearance [APP-126].** Only crossing point V11 was found to be species rich, with crossing point V9 not able to be surveyed. All other crossing point locations are species poor (i.e., <5 species per 30m length) and so would not achieve important status in accordance with wildlife and landscape criteria set out in Schedule 1 of the Hedgerow Regulations 1997. Crossing point V11 did include 5 or more woody species per 30m length. However, it does not possess sufficient additional features to meet the definition of species rich. Following a precautionary approach, it is assumed that V9 could be an important hedgerow. The Applicant has sought to avoid hedgerow removal with substantial hedgerow planting totalling over 17km proposed. As such, the loss is equivalent to less than 0.5% of proposed planting and the majority of that would fall below the criteria to be considered species rich.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.3.12	The Breeding Bird Repot [APP-092] is incomplete and the impact to these birds cannot be ascertained until Annex 3 is provided.	The Applicant notes this omission and has submitted an updated survey report which includes Annex 3. While providing contextual information, the absence of this report would not preclude an assessment of impacts.
2.3.13	A comprehensive assessment of trees for roosting bats has not been completed. Not all trees have received Ground Level Tree Assessment, including those within Huntingdon Wood (zone of influence). At least 18 trees have been identified as having bat roosting potential during survey work, including trees that could support individual or multiple bat including maternity colonies. However, the location of these trees is unclear and no detailed surveys have been completed to confirm presence / absence of roosts. The ES Chapter 7 [APP-141] assessment is based on inaccurate knowledge of the construction works (construction lighting will be on from 7am-7pm, not 8am-6pm) and assumed mitigation measures are not contained in the Outline Construction Environmental Management Plan (oCEMP) (e.g. lack of sensitive lighting design). Therefore, there is a potential for scheme to have adverse impact on bats. It is recommended roosting bats are scoped in and further detailed bat surveys completed to understand usage of the site by roosting bats. And that roosting bats are scoped into the ecological impact assessment.	The mitigation hierarchy has been followed with avoidance of impacts to all trees as confirmed in Table 2 of the Arboricultural Impact Assessment **[APP-056].** The ecological assessment has been undertaken in line with relevant guidance, including CIEEM guidelines for EcIA and BS 42020:2013. A key part of BS 42020 is proportionality, with surveys required to be 'proportionate to the degree of risk'. As such, surveys are not necessarily required where there is a low risk of impacts, or where impacts can be confidently predicted. That is precisely the case in the context of the Scheme. Section 4.1.2 of the **oCEMP [REP1-032]** confirms construction operations would 'generally be limited to 08.00 to 18.00hrs Monday to Friday' with shorter working hours on Saturdays which has formed the basis of the Applicant's assessment. It is unclear to the Applicant where CCC obtained contrary information on the timing of works. The **oCEMP [REP1-032]** includes several sensitive lighting measures, to avoid impacts on both human and ecological receptors, which are set out in Sections 4.1.30 to 4.1.33, Table 5.1 and Table 5.2. It also provides a framework for the final CEMP. This would include additional detail on construction lighting / mitigation. In light of the above, there should be no need for roosting bats to be scoped into the environmental impact assessment and for any further detailed bat surveys to be carried out.
2.3.14	Similarly, the assessment for impact to foraging and commuting bats does not accurately reflect the proposed construction works – site lighting will be extended longer (7am-7pm) and the oCEMP does not incorporate the measures set out in ES Chapter 7 [APP-	Section 4.1.2 of the **oCEMP [REP1-032]** confirms construction operations would 'generally be limited to 08.00 to 18.00hrs Monday to Friday' with shorter working hours on Saturdays. It is unclear where CCC have obtained contrary information. The **oCEMP [REP1-032]** includes several sensitive lighting measures, to avoid impacts on both human and ecological receptors. Within the oCEMP, these are

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	043]. The oCEMP needs to be updated to include a sensitive lighting scheme to minimise adverse impacts.	discussed in the following locations: Section 4.1.30 to 4.1.33, Table 5.1 and Table 5.2. The **oCEMP [REP1-032]** provides a framework document and will be developed into a final CEMP, which would be required to be in substantial accordance with the oCEMP. This would include additional detail on lighting. In light of this, the Applicant can confirm that, the assessment has been undertaken in the context of the correct construction timescales and the oCEMP clearly includes provision of sensitive lighting measures. Accordingly, there should be no need for the assessment to be changed or the oCEMP updated.
2.3.16	A comprehensive assessment for Great Crested Newts (GCN) has not been completed, with no surveys of ponds within 250m of site C and D (ponds P40, P41, P42, P43, P44, P46 and P55) – survey work is needed to confirm presence / absence. Further survey work is required to confirm presence / absence of GCN.	When carrying out the GCN surveys, it was not possible for the Applicant to gain access to third party land outside the site and, as such, it was not possible to survey all ponds within 500m of the Order Limits. Where it was not possible to survey these ponds, a precautionary approach was adopted to the Environmental Impact Assessment, which assumes that GCN are present in all ponds that could not be surveyed based on known presence in the wider area. In February 2026 the Applicant submitted a draft licence application to Natural England to gain a 'letter of no impediment'. The application was made as a direct response to the Written Representation **[REP1-081]** Natural England submitted for examination Deadline 1 (7th April 2026). On the 24th April 2026 Natural England provided a formal written response confirming that they have no impediment to issuing a license later in the process. The letter forms part of the Applicant's submission to examination Deadline 2. It should be noted that in addition to the precautionary approach taken to the assessment the Applicant is also proposing reasonable avoidance measures within the **oCEMP [REP1-032]** to safeguard amphibians during the construction process. Thus, for the reasons stated, the Applicant does not consider that further survey work is required to confirm presence / absence of GCN.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.3.17	ES Chapter 7 [APP-043] does not consider impact of habitat loss / access tracks and vehicle movements / cabling routes within close proximity to these ponds 40, 41 and 43 on GCN. Although, it is identified that works require a European Protected Species Mitigation Licence. To enable the ExA to determine whether the scheme meets the three derogation licensing tests, GCN population surveys must be completed (to ensure proposed mitigation is acceptable). Alternatively, the Applicant may wish to utilise Natural England's GCN District Level Licensing Scheme operating in Cambridgeshire (if its applicability can be demonstrated). We would expect the applicant and Natural England to have agreed the approach and Natural England have issued a Letter of No Impediment (LONI).	No access was available at pond P40. However, it was possible to undertake surveys at P41 and P43. P41 was found to be dry, and so unsuitable for GCN, while P43 was found likely absent of great crested newt through an eDNA survey. P40 is located over 600m from the nearest cabling, significantly beyond the radius in which impacts would be expected. In February 2026 the Applicant submitted a draft licence application to Natural England to gain a 'letter of no impediment'. The application was made as a direct response to the Written Representation **[REP1-081]** Natural England submitted for examination Deadline 1 (7th April 2026). Natural England have subsequently provided a formal written response on the 24th April 2026 confirming that they have no impediment to issuing a license later in the process. The letter forms part of the Applicant's submission to examination Deadline 2. As noted in the response to CCC LIR paragraph 2.3.16 above, the Applicant can also confirm that reasonable avoidance measures have been included within the **oCEMP [REP1-032]** to safeguard amphibians, this includes measures relating to excavations and trenching. The Applicant is also keen to reiterate that the assessment both for the licence application and Environmental Statement has taken a precautionary approach by assuming the presence of GCN in ponds that could not be surveyed.
2.3.18	A comprehensive assessment for water vole was not completed. Survey work solely focused on watercourse crossing points and did not meet professional standards. Water vole habitat was identified; however, results were inconclusive at confirming water vole presence. The ES Chapter 7 assessment needs to be expanded to consider impact of scheme on ponds or watercourses at risk of pollution during construction (e.g. lighting, vehicle movement), disturbance (works / human activity within 10m), creation of SuDS and works to watercourses (e.g. enhancement to tributary to the River Kym). There will be an adverse impact on water vole, however, detailed survey work is required to determine whether it will be a significant impact.	The Applicant has followed the mitigation hierarchy in avoiding the majority of watercourses. Survey design has been undertaken with reference to the Water Vole Mitigation Handbook, an extract of which is provided below. **Type of works** / **Example project** / **To confirm presence or likely absence of water voles** Very small-scale works affecting up to 15m of watercourse / Construction of an outfall, bridge repair works, or installation of pipes up to 15m long within narrow field drains (where these do not form part of a larger development) / Field survey – footprint of the works, including temporary work areas, plus 100m upstream and downstream. A comprehensive desk study exercise will not necessarily be required.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	Different survey techniques may be required if dense vegetation continues to be a problem (e.g. change timings, utilise rafts, eDNA or detection dogs).	Permanent and temporary watercourse crossings as described in **ES Vol1 Chapter 2 [APP-038],** would be no wider than 4m, and as such culverting would be localised and less than 15m in any given location, meeting the Water Vole Mitigation Handbook definition of 'very small-scale works'. As such, surveys up to 100m upstream and downstream of the impact site are appropriate to confirm the presence or likely absence of water voles. Having carried out those surveys the Applicant found no conclusive evidence of water vole. Notwithstanding this, the Applicant has elected to follow a precautionary approach regarding the presence of water vole and general mitigation measures and Reasonable Avoidance Measures have been included within the **oCEMP [REP1-032],** including pre-construction surveys for works within 10m of a watercourse. Noting that water vole burrows are typically located within 3-5m of the toe of a bank. Accordingly, the Applicant does not agree with the Council on this matter. Based upon the facts presented above, the Applicant does not consider the scheme would result in a impact on water vole, or that further detailed survey work is required to determine whether it would result in a significant impact.
2.3.19	There is evidence to suggest that solar panels can adversely impact the life cycle of invertebrates that lay eggs in water. However, there has been no assessment of construction impacts to this within ES Chapter 7 [APP-043].	Invertebrates were scoped into the assessment presented within **ES Vol 1 Chapter 7 [APP-043]**. It is acknowledged that some studies have shown polarized light can attract some aquatic insects and stimulate egg laying behaviour. While limited research has been conducted on this subject in a UK context, a literature review by BSG Ecology states that as 'solar parks in the UK Employ grid-formed panels with anti-reflective films, it is likely that the reflection of polarized light from these surfaces is already substantially reduced'. As confirmed in Paragraph 2.4.20 of **ES Vol 1 Chapter 2 [APP-038]** the panels proposed in connection with the Scheme would include anti-reflective coatings. In **ES Vol1 Chapter 7 [APP-043],** invertebrates are considered as part of "Other Notable Species" in the construction phase assessment. Construction activity has

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		the potential to affect other notable species including invertebrates, because they are associated with margin and boundary habitats (hedgerows, ditches and watercourses) . However: • boundary habitats would largely be retained and protected during construction through embedded buffers of at least 6 m, with only localised works at crossing and access locations; . • those localised works would be undertaken under relevant avoidance measures (RAMs) set out in the in the **oCEMP [REP1-032]** • post-construction, seven crossing points totalling 37 m would be reinstated • The Applicant has followed the mitigation hierarchy by including a minimum 10m buffer between the fenceline of the solar farm and the bank top of watercourses. On that basis, the ES concludes that, given the small scale and localised nature of works, construction would have negligible impacts on other notable species (including invertebrates) and that the resulting effects are not significant (in EIA terms). Chapter 7 of the ES **[APP-043]** confirms that, once operational, it is expected that the Scheme would result in overall benefits to the invertebrate assemblage within the Site and immediate surrounds through implementation of landscape proposals and reduction in pesticide treatments commonly used within an agricultural setting.
2.3.20	Cambridgeshire is known as a stronghold for arable flora and therefore we are concerned there will be potential adverse impacts to these species / assemblages. This issue has been raised by the council to the applicant as part of our response to the Preliminary Environmental Impact Report. However, there has been no assessment of construction impacts to notable / rare arable flora. Arable farmland provides ideal locations to notable arable flora, as has been the case for other developments on the clay soils of Huntingdonshire (e.g. A428 Black Cat to Caxton Gibbet). The proposed scheme will result in the creation of large	It is acknowledged by the Applicant that Cambridgeshire is a stronghold for arable flora. However, the presence of such notable flora within the Site has not been confirmed through either the habitat survey or desk study. The Site comprises managed arable land with management practices likely to include periodic herbicide and fertilizer use which is detrimental to arable flora. Given the above, it is considered unlikely that the Site supports a significant or notable assemblage of arable flora. However, the Applicant is open to exploring whether arable flora can be included in the landscape masterplan and will look to engage with the Council's ecologist on the potential for doing so prior to Deadline

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	areas of permanent grassland, which will be to the detriment of arable plants that require annual ground disturbance to allow germination and avoid competition. Botanical survey work is required to determine whether arable flora of local, county or national importance will be lost to the scheme.	3. If the discussion results in changes to the landscape scheme the Applicant will submit updates to the necessary documentation at Deadline 3. It should be noted that even if further details are not agreed or included within the examination process it is relevant to note that the **oLEMP [REP1-040]** includes an allowance for pre-construction surveys to be undertaken to update the ecological baseline including for arable flora. This would be a further verification of its presence or absence. Furthermore, even in the absence of arable flora as part of the mitigation, it must be emphasised that the Scheme would nevertheless deliver very significant benefits to a range of ecological receptors, including habitats and plant species.
2.3.21	Mitigations required: It is not possible to ascertain the level of mitigation required for a number of ecological receptors due to insufficient evidence / survey work to determine the baseline information and potential impact of the scheme, particularly on arable flora, water vole, bats and great crested newts. For example mitigation for arable plants may be required.	For the reasons stated above, the Applicant disagrees that insufficient evidence is available to determine mitigation requirements. Mitigation outlined within the ES and associated documents are sufficient to reduce impacts, ensure legislative compliance and provide overall enhancement.
2.3.22	The Outline Construction Environment Management Plan needs to be updated to better protect bats and water voles, including details of a sensitive lighting strategy, including dark corridors.	An updated version of the **oCEMP [REP1-032]**, was prepared and submitted by the Applicant at Deadline 1 and the Applicant does appreciate that the Council may have not had sight of it when preparing their LIR. The current iteration of the **oCEMP [REP1-032]** includes measures to protect water vole and bats (amongst other receptors). Avoidance measures method statements have been provided as Appendix B, as well as a series of other measures listed within Table 5.3. It includes several sensitive lighting measures, to avoid impacts on both human and ecological receptors which are set out in Sections 4.1.30 to 4.1.33 and Tables 5.1 and 5.2. As stated previously, the **oCEMP [REP1-032]** provides a framework document and which the final CEMP needs to be in substantial accordance. It would include additional detail on lighting.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.3.23	Further detailed assessment is required to demonstrate how adequate compensatory nesting habitat for skylarks and other ground nesting birds will be achieved. If this is not possible, then off-site solution to provide compensatory habitat will be required. This should be secured through a suitable worded section 106.	The **oLEMP [REP1-040]** submitted at Deadline 1**,** provides additional detail and clarification regarding the Applicant's approach to farmland bird mitigation, and is provided as Appendix C, 'farmland bird mitigation strategy'. The strategy the Applicant is advocating for the mitigation of impacts on ground nesting birds (i.e., provision of open grassland) is comparable to that proposed the Fenwick Solar Farm (EN010152) and Springwell Solar Farm (EN010149), which were granted development consent by the Secretary of State (SoS) in February 2026 and April 2026, respectively. The Applicant considers their approach to be appropriate and proportionate, and it is clearly in line with practice that has been accepted on other Solar DCO projects.
2.3.24	Mammal access points have been incorporated into the design of the perimeter fence ([APP-122] Figure 2-2n), however, it is unclear the size and spacing / frequency of mammal gate. We seek this figure is updated to include this information.	The positing of mammal gates would be in part informed by pre-construction surveys for badgers. Mammal gates would be targeted to areas nearby to known areas of badger (and other mammal) usage as indicated by setts, pathways and latrines. **ES Vol1 Chapter 2 [APP-038]** currently specifies a minimum of two gates per fenced area.
2.3.25	Operational Phase Impacts Positive: Biodiversity Net Gain The Biodiversity Net Gain report [APP-168] identifies increases in habitat, hedgerow and watercourse units. However, insufficient evidence has been provided to demonstrate how these calculations have been produced and therefore, the following information is required: a) Habitat surveys of land that was not accessible / omitted due to boundary changes. Assessing habitat types and conditions using aerial photography is not acceptable. b) Pre-development habitat maps showing primary and secondary UKhab codes, land parcel numbers and all habitat types (including individual trees). We recommend separating out habitat, hedgerow and watercourse units, so that it's easier to read; and to	The Applicant does not agree that insufficient evidence has been provided to demonstrate how the BNG calculations have been produced. However, they do appreciate that the Council will have made these comments in advance of further submissions to the examination regarding BNG. The Applicant has responded to each of the Councils points in turn below. a) All land within the Order Limits where access was available to the Applicant was surveyed. However, the Applicant's was unable to access all of the land as no permission could be obtained. As stated within the **Biodiversity Net Gain (BNG) Report [REP1-052]**, areas the surveyors were unable to access are assumed to be in good condition, allowing for the assessment to be carried out on a robust, precautionary basis.

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	utilise different colour pallet to avoid confusion between woodland and grassland 'greens' c) Pre-development and post-development habitat maps showing habitat conditions d) Provide ExA and local authorities GIS layer with habitat data e) Drawing to show location of irreplaceable habitat f) Provide habitat condition assessments and watercourse BNG assessments (MoRPh) g) Statutory Biodiversity Metric accurately record area of 'irreplaceable habitat' h) Excel spreadsheet for Statutory Biodiversity Metric calculations, including entry for each land parcel / individual tree etc. i) Statutory Biodiversity Metric calculations take into account Local Nature Recovery Strategy (if possible) j) Illustrative Environmental Masterplan [APP-121] to include all post-development habitats referenced in the Biodiversity Net Gain Report (e.g. watercourse enhancement) k) oLEMP [REP1-040] cover management for all post-development habitat creation / enhancements set out in the BNG report (e.g. tributary of River Kym omitted)	b) Pre-development habitat maps have been provided as **ES Vol 3 Figure 7-2 [APP-145]**. Baseline condition data has also been provided (point d) which should enable a review of baseline habitat information. c) Post-development habitats are shown on the Environmental Masterplan. Both the **BNG Report [REP1-052]** and the **oLEMP [REP1-040]** include a translation table to clarify how proposed landscape habitats relate to those within the biodiversity metric. d) a GIS Layer has been provided to the Council e) **ES Vol 2 Appendix 2-2 Arboricultural Assessment [APP-056]** identifies locations of ancient / veteran trees and ancient woodland, including on accompanying figures. No other ancient or irreplaceable habitats are present within the Scheme. f) The MoRPH baseline is provided as Appendix B to the **BNG Report [REP1-052]** g) As outlined within the limitations section of Biodiversity Metric Report **[REP1-052]**, it is acknowledged that the definition of ancient and veteran trees used for Arboricultural classifications differs from that within the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Given the extent of the Site and retention of trees in line with BS 5837:2012 it was considered disproportionate to survey all trees in accordance with both arboricultural and ecological definitions. However, for the purposes of the BNG calculations the definition was extended to include any trees described as having veteran features but not achieving arboricultural veteran status (i.e., including T021, T039, T131, T133 and T146). It is notable that irreplaceable habitats do not contribute units to the BNG baseline and so would not alter the overall score and as such this is not considered a limitation to the assessment and is considered by the Applicant to represent a proportionate approach to the survey.

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		h) As outlined within the **BNG Report [REP1-052]** due to the large number of individual habitat parcels, habitat types and conditions have been aggregated. A GIS layer has been provided to illustrate this. i) The Applicant can confirm that the Biodiversity Net Gain calculations take into account publication of the LNRS. j & k) Enhancements to the River Kym are as a result of reduction in riparian encroachment, which is currently present due to baseline agricultural use of land within 10m of the watercourse banktop. As such, enhancements are delivered incidentally through the landscape design as a whole and through the creation and management of grassland. The **oLEMP [REP1-040]** provides for management of habitats during the operational phase of the development.
2.3.26	At the detailed design stage, the Applicant will seek to maximise BNG at the detailed design stage with a commitment to 70% habitat units, 30% hedgerow units and 5% watercourse units (para 5.2.1, Biodiversity Net Gain report [APP-168). However, the Council seeks that the applicant delivers a minimum of 10% BNG across all three units to be considered of significant benefit and would accord with the other NSIP energy scheme approved in Cambridgeshire, Sunnica Energy Farm.	This comment is noted. However, it must be recognised that a mandatory 10% BNG is not a formal requirement for NSIP developments, and the Government are currently proposing a separate, bespoke regime for the assessment of BNG in relation to NSIPs, as detailed below. While it is not proposed at this point to update the **BNG Report [REP1-052]** in light of the recently published Government consultation response guidance[2] as to how BNG should be applied to NSIPs, which is applicable only to developments submitted after November 2026 (the application for the Scheme was submitted in October 2025). It is noteworthy that NSIPs would be expected to apply BNG in a significantly different way to schemes being brought forward under the Town and Country Planning Act 1990, which has been used as the framework for the BNG calculations undertaken to date. In particular, any retained areas of habitat not impacted would be excluded from the BNG boundary. In this case, this would likely mean that almost all hedgerow

[2] https://www.gov.uk/government/consultations/biodiversity-net-gain-for-nationally-significant-infrastructure-projects

<table>
<tr><th>Para Ref.</th><th>CCC Local Impact Report Comment</th><th>Applicant Response</th></tr>
<tr><td></td><td></td><td>
and watercourse habitats on the Scheme would be excluded from the BNG baseline, significantly increasing the overall percentage gain delivered.

Whilst it is not fully clear how NSIP proposals would be delivered, an indicative calculation has been provided below based on the exclusion of currently retained habitats from the baseline. All habitat loss, creation and enhancement are still accounted for and is unchanged.

If the Scheme applied the BNG framework that is being proposed for NSIPs, it is highly likely that all BNG targets would exceed 10%.

<table>
<tr><th></th><th>Habitats</th><th>Hedgerows</th><th>Watercourses</th></tr>
<tr><td>Current baseline</td><td>1,854.77</td><td>314.61</td><td>54.97</td></tr>
<tr><td>Retained units</td><td>266.31</td><td>312.92</td><td>39.87</td></tr>
<tr><td>NSIP baseline (baseline less retained units)</td><td>1,588.46</td><td>1.69</td><td>15.1</td></tr>
<tr><td>Post-development (excluding retained habitats)</td><td>3,032.32</td><td>117.82</td><td>18.38</td></tr>
<tr><td>Unit change</td><td>+1,443.86</td><td>+116.13</td><td>+3.28</td></tr>
<tr><td>Percentage change</td><td>+91%</td><td>+6,872%</td><td>+22%</td></tr>
</table>

In summary, there is no formal requirement for the Scheme to demonstrate 10% BNG even through that is an aspiration of the Applicant and were the Scheme to be considered against the bespoke BNG calculation regime that is being proposed specifically for NSIPs it would significantly exceed the 10% requirement in all regards.
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Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.3.27	It is considered that the scheme has not maximised opportunities to enhance watercourses flowing through the site (e.g. tributary to the River Kym) or within the riparian zone (River Kym along the northern boundary), such as, in-channel enhancements. The Council seeks the applicant further explore opportunities to deliver 10% watercourse units on-site.	The Applicant has demonstrated that the Scheme delivers significant ecological benefits across a range of habitats and delivers a net gain in biodiversity. The reduction in agricultural encroachment within watercourse riparian zones and establishment of enhanced landscape corridors along these features would provide watercourse enhancement. Further, the cessation of agricultural uses, including associated herbicide, pesticide and fertilizer use would also be expected to have localised benefits to water quality.
2.3.28	The commitment to deliver at least 10% BNG should also be incorporated into the DCO [PDA-005] requirements - either as a standalone requirement or part of Requirement 4 – Landscape and Ecological Management Plan. As has been the case for other NSIP schemes (e.g. The Sunnica Energy Farm Order 2024 (Requirement 8, Schedule 2). There will also need to be requirements within section 106 agreements with local authorities to secure adequate funding for monitoring of the delivery of the BNG, as well as securing submission of BNG audits throughout the lifetime of the scheme and requirement to complete remedial works (if required).	As stated previously a 10% BNG is not mandatory for the Scheme, nor would it qualify as such under the new BNG guidance for NSIPs which will only apply to schemes submitted after November 2026. As such, it is not necessary for the Applicant to be held to a requirement that mandates delivery of 10% BNG. The inclusion of the DCO requirement on the Sunnica Solar DCO scheme will have been at the discretion of that Applicant. Whilst it is not a mandatory requirement, the Applicant is motivated to deliver high BNG for the East Park Scheme and has amended the **oLEMP [REP1-040**] to provide a firm commitment to achieving biodiversity net gains. 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 [REP1-040**] sets out how habitats will be monitored, with Section 8.2 referring specifically to BNG. Paragraph 8.2.4 states that: "*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."* The Applicant will endeavour at the detailed design stage to meet or even exceed the higher BNG totals as assessed in the **BNG Report [REP1-052]** , particularly with regard to watercourse units. Requirement 4 of the **draft DCO [REP1-005]** would secure a final Landscape and Ecological Management Plan in substantial accordance with the **oLEMP [REP1-040**], that is also the subject of agreement with the council, prior to commencement of any phase of the authorised development. The Applicant is

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		committed to providing biodiversity net gains, and considers this approach adequately secures the Applicant's proposed BNG for the Scheme.
2.3.29	Other habitats – Tributary to the River Kym The Biodiversity Net Gain report [APP-168] identifies enhancements to the Tributary to the River Kym (page 30, Appendix A [APP-168]), however, these have not been included within the outline Landscape and Ecological Management Plan [REP1-040]. We seek the oLEMP be updated to adequately cover this habitat.	Enhancements to the River Kym are as a result of reduction in riparian encroachment, which is currently present due to baseline agricultural use of land within 10m of the watercourse banktop. As such, enhancements are delivered incidentally through the landscape design as a whole and through the creation and management of grassland which is included within the **oLEMP [REP1-040]**.
2.3.30	Protected species The delivery of the landscape scheme, including implementation of a Landscape and Ecological Management Plan will result in beneficial impacts to foraging / commuting bats, amphibians, reptiles, breeding birds (with the exception of ground nesting birds) and non-breeding birds.	The Applicant notes and welcomes this comment. The oLEMP provided at Deadline 1 **[REP1-040]** includes additional detail relating to farmland bird mitigation, provided as Appendix C, farmland bird mitigation strategy. The mitigation strategy (i.e., provision of open grassland) is comparable to that proposed in connection with the Fenwick Solar Farm (EN010152) and the Springwell Solar Farm (EN010149), which were granted development consent by the Secretary of State (SoS) in February 2026 and April 2026, respectively.
2.3.31	Neutral: The ES Chapter 7 [APP-043[considered negligible impact to water vole (if present), however this is not considered to be comprehensive. Better consideration needs to be given to both negative impacts, including air / waste pollution from vehicle movements. As well as, positive impacts from enhancement to the tributary of the River Kym and ditch enhancements in Outline Landscape and Ecological Management Plan (oLEMP) [REP1-040].	No conclusive evidence of water vole was identified during surveys [APP-096]. Table 5.7 of the **oCEMP [REP1-032]** includes mitigation measures to reduce air quality impacts, with Table 5.4 outlining hydrological mitigation including pollution control, Table 5.8 requiring good housekeeping to reduce impact of litter and Table 5.12 outlining waste management measures. The water vole mitigation handbook states that 'noise and visual disturbance are unlikely to have a significant effect on water vole', and also that 'water vole are known to survive in watercourses with very poor water quality', although it is acknowledged that pollution events could impact the species, if present. Pollution

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		events would be managed through the final CEMP, including avoidance and mitigation measures. The **oCEMP [REP1-032]** includes pre-construction surveys for works within 10m of a watercourse, although it is notable that water vole burrows are typically located within 3-5m of the toe of a bank. Through the pre-construction surveys and other mitigation measures outlined within the oCEMP, including in relation to air quality and waste management, it is considered that no adverse impacts would occur to water vole. It is agreed that implementation of the **oLEMP [REP1-040]** would likely result in habitat improvements but given no conclusive evidence of water vole, a precautionary approach has been taken to the assessment, and it is agreed that impacts are neutral.
2.3.32	Opportunities to maximise biodiversity value for all habitats present on the site has been missed because they have not all been included in the oLEMP. The Council seeks that both enhancement of in-channel watercourses and management of veteran/ ancient trees and successional planting be included.	The Applicant considers that the Scheme delivers significant ecological benefits across a range of habitats and a net gain in biodiversity. It is considered that the reduction in agricultural encroachment within watercourse riparian zones and establishment of enhanced landscape corridors along these features would provide watercourse enhancement. Further the cessation of agricultural uses, including associated herbicide, pesticide and fertilizer use would also result in localised benefits to water quality. As such, enhancements are delivered incidentally through the landscape design as a whole and through the creation and management of grassland and other proposed habitats which are included within the **oLEMP [REP1-040]**, it is not considered necessary for management of in channel watercourses. Regarding veteran trees, while direct works to established trees are not proposed, it is considered that the cessation of agricultural activities, including reduced soil disturbance from tilling and cessation of application of fertiliser, pesticides and herbicides, and the adoption of established off sets is likely to result in incidental

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		benefits to established trees. For example, the aforementioned agricultural activities are known to negatively affect mycorrhizal fungal networks.
2.3.33	Negative: Birds – Ground Nesting birds The Applicant considers a minor adverse impact to ground nesting birds during operation as a result of displacement (Chapter 7, Environmental Statement [APP 043]). It also suggests that the impact to skylarks are likely to be negligible at the population level. However, insufficient evidence has been provided to demonstrate there will be no overall loss of nesting habitat. We are concerned the scheme will result in significant adverse impact to ground nesting birds, particularly skylark which is identified of county importance. This is also inadequate consideration of cumulative impact of unmitigated losses of ground nesting bird habitat as a result of other NSIP (solar / road / rail) and other planning applications or projects (ES Chapter 17, [APP053]).	As noted previously, Appendix C of the **oLEMP [REP1-040]** submitted at Deadline 1 presents an outline farmland bird mitigation strategy (oFBMS). It provides information as to how the Scheme, through delivery of the LEMP, would deliver mitigation and enhancement for the breeding and non-breeding farmland bird assemblage. The oFBMS establishes the core mitigation principles and mechanisms that will be taken forward into the final Landscape and Ecological Management Plan (LEMP), which will be prepared and approved post-consent in accordance with Requirement 4 of the draft DCO The Applicant considered that the implementation of the oFBMS would result in an overall enhancement to the favourable conservation status of the breeding and non-breeding farmland bird assemblage within the Order Limits and immediate surrounds. It is acknowledged that ground nesting species of open ground (e.g., skylark) are most likely to be affected by the Scheme due to displacement from suitable nesting habitat. Through the provision of high-quality grassland habitat managed to be of value to ground nesting bird species, as well as provision of foraging habitat, the favourable conservation status of these species can be maintained. It is also important note that the mitigation strategy set out in the oFBMS is comparable to that proposed in connection with both the Fenwick Solar Farm (EN010152) and Springwell Solar Farm (EN010149), which were granted development consent by the Secretary of State (SoS) in February 2026 and April 2026, respectively. The cumulative effects of the Scheme is reported in **ES Vol 1 Chapter 17 [APP-053]** and the conclusions of the assessment in relation to birds is reported in Table 17.6**.** The overall conclusion of the ES is that that cumulative effects on ground nesting / farmland birds (including skylark) would remain minor adverse and not

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		significant as a result of the Scheme, whereas the cumulative outcome for the wider breeding bird assemblage would be minor adverse (not significant) in construction, but moderate beneficial (significant) in operation. The Applicant maintains this position and, for the reasons stated, do not consider any negative effects would be as great as the Council is suggesting or that significant further assessment or provision of additional mitigation is required in this regard.
2.3.34	The assessment assumes "that large areas of open grassland will continue to offer suitable nesting habitat within much of the Site". However, no quantifiable data has been provided to demonstrate how these areas will provide adequate compensatory nesting habitat for nests that will be lost to the solar panel fields. Our understanding is that open grassland and arable fields provide similar densities of nesting sites for skylarks, while areas of set-a-side support higher densities of nesting sites. This would suggest that a simple reversion of arable fields to grassland would not increase the nesting capacity of the habitat. In addition, the grassland areas need to be of sufficient size to be beneficial to skylarks. This rudimental assessment, it would suggest that the Illustrative Environmental Masterplan would not be capable of providing adequate compensatory nesting habitat for skylarks.	Within the oFBMS (contained within Appendix C to the **oLEMP [REP1-040]**). The Applicant clarifies that breeding productivity is not solely reliant on territory density, but also upon other factors including number of nesting attempts made and the survival rate of young. Management of grassland would allow for repeat nesting attempts, and the enhanced foraging is likely to result in greater survival rates of young which would, in turn, contribute to maintenance of overall breeding productivity and a sustainable local skylark population. As set out above a very similar mitigation strategy was accepted fin connection with both the Fenwick Solar Farm (EN010152) and Springwell Solar Farm (EN010149), granted development consent in February 2026 and April 2026, respectively.
2.3.35	Further detailed assessment is required to demonstrate how adequate compensatory nesting habitat for skylarks and other ground nesting birds will be achieved. If this is not possible, then off-site solution to provide compensatory habitat will be required. This should be secured through a suitable worded section 106.	See response to CCC LIR Paragraph 2.2.33 above. The Applicant maintains their position on this matter and, for the reasons stated in their response, the do not consider any negative effects would be as great as the Council is suggesting or that significant further assessment or provision of additional mitigation is required in this regard.
2.3.36	Invertebrates There has been no assessment of operational impacts to invertebrates within ES Chapter 7 [APP-043] and therefore cannot determine whether or not there will be adverse impacts. There is	See response to CCC LIR paragraph 2.3.19

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	evidence to suggest that solar panels can adversely impact the life-cycle of invertebrates that lay eggs in water.	
2.3.37	Flora There has been no assessment of operational impacts to notable / rare arable flora. Cambridgeshire is known as a stronghold for arable flora and therefore we are concerned there will be potential adverse impacts to these species / assemblages. This issue has been raised by the council to the applicant as part of our response to the Preliminary Environmental Impact Report, however, no targeted surveys for arable flora have been undertaken. Arable farmland are ideal locations to notable arable flora, as has been the case for other developments on the clay soils of Huntingdonshire (e.g. A428 Black Cat to Caxton Gibbet). The proposed scheme will result in the creation and management of large areas of permanent grassland will be to the detriment of arable plants that require annual ground disturbance to allow germination and avoid competition. Botanical survey work is required to determine whether arable flora of local, county or national importance will be lost to the scheme. We note that pre-commencement surveys for arable flora have been included in the oLEMP (para 5.2.9 [REP1-040]), but details have been omitted – we seek these be included.	See response to CCC LIR paragraph 2.3.20
2.3.38	Mitigations required: It is not possible to ascertain the level of mitigation required for a number of ecological receptors due to insufficient evidence / survey work to determine the baseline information and potential impact of the scheme during operation, particularly on arable flora, water vole, bats and great crested newts.	The Applicant disagrees with this comment. All surveys have been undertaken with regard to relevant best practice. The mitigation has been followed with avoidance of impacts to trees, boundary features and watercourses. A key part of BS 42020:2013 states that surveys are required to be 'proportionate to the degree of risk'. As such, surveys are not necessarily required where there is a low risk of impacts, or where impacts can be confidently predicted.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.3.39	We seek greater clarification as to how the solar panels have been designed to avoid adverse impacts to birds and invertebrates that may be attracted to the panels. Mitigation for arable flora may also be required.	It is acknowledged that some studies have shown polarized light can attract some aquatic insects and stimulate egg laying behaviour. While limited research has been conducted on this subject in a UK context, a literature review by BSG Ecology states that as 'solar parks in the UK Employ grid-formed panels with anti-reflective films it is likely that the reflection of polarized light from these surfaces is already substantially reduced'. A similar effect has been hypothesized in birds. However a Natural England literature review concluded 'little scientific evidence exists that demonstrates a direct impact of solar PV on birds'. A further literature review conducted by BSG Ecology stated 'very few relevant research papers were found during the data search for this review that substantiated these contentions [that birds confuse Solar PV with waterbodies]. Furthermore, no studies from the UK or Europe were found'. It is noteworthy that Natural England have raised no concerns relating to this matter in relation to the nearby Grafham Water SSSI. As stated in **ES Vol 1 Chapter 2[APP-038]** Paragraph 2.4.20 panels will include anti-reflective coatings. The Applicant has followed the mitigation hierarchy by including a minimum 10m buffer between the fenceline of the solar farm and the bank top of watercourses. As stated, the surveys carried out to date have not explicitly identified arable flora but the Applicant is willing to have a further discussion with the Councils ecologist to discuss this further in advance of examination Deadline 3.
2.3.40	Further detailed assessment and mitigation strategy is required to demonstrate how adequate compensatory nesting habitat for skylarks and other ground nesting birds will be achieved. If this is not possible, then off-site solution to provide compensatory habitat will be required. This should be secured through a suitable worded section 106.	See response to CCC LIR Paragraph 2.2.33 above. The Applicant maintains their position on this matter and, for the reasons stated in their response, the Applicant does not consider any negative effects would be as great as the Council is suggesting or that significant further assessment or provision of additional mitigation is required in this regard.

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2.3.41	The council welcomes the proposed setting up of a steering group to oversee delivery of the LEMP (Section 4.3, oLEMP [REP1-040]). Adequate funding will need to be secured, through section 106, to enable local authority officers and wildlife trust to actively attend the steering group. It may also be beneficial to include research partners, if their work can help influence the landscape management for the better.	The Applicant notes and welcomes this response.
2.3.42	Decommissioning Phase Impacts Negative We do not agree with the assumption in the ES Chapter 7 [APP-043] that *"impacts arising for decommissioning are considered to be commensurate with those experienced during construction and are therefore not assessed in detail"* (para 7.8.143). The implementation of the Illustrative Environmental Management Plan and Landscape and Ecological Management Plan will ensure habitat of higher value is secured through the operational phase. Therefore, potentially resulting in much higher losses, than the construction phase.	The Applicant notes that the land will predominantly be leased for the operational phase and, following decommissioning, will be returned to the landowners in accordance with the relevant commercial agreements. For that reason, the Applicant cannot provide an absolute commitment that all enhancements will be retained in perpetuity once the land has been handed back to landowners. Notwithstanding the above, paragraphs 7.1.2 and 7.1.3 of the **oLEMP [REP1-040]** confirm that proposed native species woodland and woodland belt planting, proposed native species hedgerow planting, and proposed native species individual tree planting would be retained at decommissioning and handed back to landowners as mature landscape features. Paragraphs 7.1.4 to 7.1.6 **[REP1-040]** set out that other elements (including proposed grazing pasture or neutral grassland and species-diverse grassland, and ecological enhancement features) would remain on site at decommissioning but their future retention would be at the discretion of the landowners once the land is handed back and the development consent order terminates. At the heart of this application is the fact that this is a temporary planning consent. It would not be the actions of the Applicant or the Scheme to remove such enhancements following decommissioning.
2.3.43	The creation of habitats that will support a range of species will inevitably attract species to the solar farm development, including protected species. For example, Great Crested Newts will have improved habitat connectivity across a previously sterile	The Applicant welcomes acknowledgement of the benefits provided by the scheme to ecological receptors. An **oDEMP [REP1-038]** has been provided with ecological mitigation and management measures to be employed provided as Table 5.3. Amongst other

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	landscape; areas managed for arable flora may achieve become of county importance; and delivery of BNG units.	measures, this would require a pre-decommissioning ecological survey to be undertaken to assess changes and inform mitigation, which would be undertaken in line with regulatory requirements and best practice as applicable at the time. The final Decommissioning Environmental Management Plan would be secured as a requirement of the DCO and would be required to be in substantial accordance with the **oDEMP [REP1-038]**.
2.3.44	Loss of habitats, and species they support, that have developed during the operational period of the scheme. This could include priority habitats, protected species and species / habitats of local, county or national importance and significant reduction in Biodiversity Net Gain value. It will be important that decommissioning is well designed to avoid adverse impacts.	The **oDEMP [REP1-038]** would provide ecological mitigation and management measures which are to be employed in the manner set out in Table 5.3. Amongst other measures, this would require a pre-decommissioning ecological survey to be undertaken to assess changes and inform mitigation, which would be undertaken in line with regulatory requirements and best practice as applicable at the time. The final Decommissioning Environmental Management Plan would be secured as a requirement of the DCO and would be required to be in substantial accordance with the **oDEMP [REP1-038]**.
2.3.45	Mitigations required: Expand the landscape elements to be retained at the decommissioning phase of oLEMP (para 7.1.2) [REP1-040]] / Outline Decommissioning Environmental Management Plan (oDEMP) [REP1-038] to secure retention highest quality ecologist features, including - all irreplaceable habitat and priority habitat and habitat of county importance or supporting species and/or assemblages of district or county importance.	The Applicant that the development consent sought under this application is temporary in nature and that the land within the Order limits will be returned to the landowners in accordance with the relevant commercial agreements. For that reason, the Applicant cannot and should not be required to provide an absolute commitment that all enhancements will be retained in perpetuity once the land has been handed back to landowners and the scheme has been decommissioned. Notwithstanding the above, paragraphs 7.1.2 and 7.1.3 of the **oLEMP [REP1-040]** confirm that proposed native species woodland and woodland belt planting, proposed native species hedgerow planting, and proposed native species individual tree planting would be retained at decommissioning and handed back to landowners as mature landscape features. Paragraphs 7.1.4 to 7.1.6 **[REP1-040]** set out that other elements (including proposed grazing pasture or neutral grassland and species-diverse grassland, and ecological enhancement features) would remain on site at decommissioning but their future retention would be at the discretion of the landowners once the land is handed back and the development

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		consent order terminates. At the heart of this application is the fact that this is a temporary planning consent. It would not be the actions of the Applicant or the Scheme to remove such enhancements following decommissioning. Moreover, if landowners were inclined to remove elements, they would have to consider what is present in those areas at the time and the protections that may be in place to safeguard their loss. There are no policy or statutory requirements to this effect.
2.3.46	Mechanism within the oLEMP [REP1-040] / 0DEMP [REP1-038] for a steering group to work towards securing long-term habitat retention and management beyond the lifespan of this development.	The Applicant has committed to a steering group to work towards securing habitat management over the life of the Scheme. However, as stated in the response to paragraph 2.3.45 of CCC's LIR above, it is not possible to extend that beyond the decommissioning of the Scheme whereby the land would return to the landowners and the development consent order ceases to have effect. Agreement would have to be sought independently with the landowners over the long-term management of the retained habitats.
2.4.1	Hydrology (ES Chapter 8 Hydrology and Flood Risk) Summary The Lead Local Flood Authority (LLFA), Cambridgeshire County Council expects any proposal to have appropriate surface water drainage infrastructure which prioritises the use of Sustainable Drainage Systems (SuDS) and does not increase surface water flood risk.	These points are noted by the Applicant
2.4.2	As the council has a statutory role as Lead Local Flood Authority, sufficient evidence is required to be provided to demonstrate that a suitable drainage solution can be delivered for all sites both during construction and operation.	
2.4.3	The Council is not the responsible authority for flood risk resulting from coastal or fluvial flooding, we defer to others who are experts in this area.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.4.4	Policy Context Huntingdonshire's Local Plan to 2036 Policy LP5-Flood Risk sets out how new development in Huntingdonshire must address flood risk to ensure that people, property and infrastructure are safe throughout the lifetime of the development.	The Applicant acknowledges that these are relevant local plan policy and guidance.
2.4.5	Cambridgeshire County Council Flood and Water Supplementary Planning Document (adopted by the districts) The SPD provides guidance on the approach that should be taken to design new developments to manage and mitigate flood risk and include sustainable drainage systems (SuDS). SuDS mimic natural drainage to manage surface water run-off and can also deliver wider benefits such as providing green areas for biodiversity and recreation. Other Relevant Documents Surface Water Planning Guidance Document for Developers.	
2.4.6	Construction Phase Impacts Negative: Increased flood risk, erosion, detriment to water quality - Whilst the proposed sediment control measures such as silt fencing, filter strips, silt matting, settlement ponds, and check dams, are sufficient and supported by the LLFA, the applicant must identify pollution risk areas and demonstrate that these measures address surface water runoff from all relevant construction areas ensuring that surface water treated is prior to discharge.	The Applicant notes these comments.
2.4.7	Mitigations required: Mitigation measures proposed are sufficient. Further detail, such as a construction/at scale replacement/decommissioning surface water drainage plan is required to demonstrate that the proposed mitigation measures are located strategically and address surface water runoff from all construction areas ensuring the required	The Applicant welcomes confirmation from the Council that the planned mitigation measures are sufficient to address construction phase impacts. Regarding the Council's other points ,the **oSWMP [REP1-046]** has been prepared for, and addresses measures across the construction, operation and decommissioning. It includes a surface water drainage plan which the Applicant will continue to develop alongside the other relevant development plans (oCEMP

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	volumes, rates and level of water quality treatment is provided prior to discharge.	**[REP1-032]**, oOEMP **[REP1-036]**, oDEMP **[REP1-038]**) in order that it is appropriate and agreed for each phase of the development. Finally, as noted previously the Applicant intends to submit a technical note to the examination at deadline 3 that specifically seeks to provide further clarification of the environmental effects of a substantial replacement phase for the Scheme.
2.4.8	Operational Phase Impacts Negative: It has not been fully demonstrated that sufficient mitigation, utilising options thus far identified (which are supported by the LLFA), can be delivered within the Order Limits.	An outline drainage layout has been provided for the substation and BESS compound, which is the only catchment serviced by any formal drainage provisions. It is stated in the **(oSWMP) [REP1-046]** that assuming good land management, catchments containing panelled areas (and no other significant development) will have a negligible impact on surface water run-off. Therefore runoff rates within these catchments are assumed to remain at the greenfield rates, which have been provided in the oSWMP. Water quality and pollution risks have been considered based upon the Simple Index Approach, and it has been demonstrated that SuDS features are able to appropriately treat the pollutant risk factors. Pluvial modelling is being carried out for the Site and run using the 2070s epoch upper-end climate change allowance of 40% for the 3.3% and 1.0% AEP event. The drainage strategy has been updated to include the upper-end climate change allowance for the 2070s epoch.
2.4.9	Due to the high-level nature of the submitted information to date, the applicant has not demonstrated that the site can deliver mitigation that is compliant with National and Local Policy, Guidance and Best Practice within the Order Limits.	
2.4.10	Lack of consideration for climate change. The report states that the central allowance of 25% has been added for climate change. However, the upper end allowance of 40% should be used.	
2.4.11	Pollution of ground and or surface water bodies from fire water. At present the Application does not demonstrate the volumes required for firefighting and immediate and subsequent storm events can be provided onsite. The applicant has not considered how the SuDS infrastructure will be remediated following the disposal of any contaminated fire water. The applicant must consider how surface water will be managed throughout the remediation process.	The Applicant has already addressed this matter in their response to paragraph 14.1 of BCC's LIR.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.4.12	Mitigations required: The applicant must provide hydraulic calculations, drainage plans, and proposed discharge rates for each catchment in order to demonstrate that there is no increased flood risk elsewhere in line with the NPPF, and that this can be delivered within the Order Limits.	An outline drainage layout has been provided for the substation and BESS compound, which are the only catchments serviced by formal drainage provisions. It is stated in the **outline Surface Water Management Plan (oSWMP) [REP1-046]** that assuming good land management, catchments containing panelled areas (and no other significant development) will have a negligible impact on surface water run-off. This approach was agreed as acceptable with CCC, therefore runoff rates within these catchments are assumed to remain at the greenfield rates, which have been provided in the oSWMP. Water quality and pollution risks have been considered based upon the Simple Index Approach, and it has been demonstrated that SuDS features are able to appropriately treat the pollutant risk factors. In terms of the wider site and with specific reference to flood risk, the Applicant has undertaken additional pluvial hydraulic modelling for the Scheme during the examination period, applying climate change allowances for the 2080s epoch. They agreed at a meeting with the Environment Agency (EA) that pluvial modelling can be taken as representative of the flooding mechanisms from the minor watercourses through the Site. The Applicant has shared the hydraulic modelling report with the EA for review who have confirmed they are satisfied with the results. The hydraulic modelling has produced detailed flood level mapping which has been used to identify locations where the bottom edge of panels would need to be greater than the current 800mm minimum secured in Table 1 of the **Design Parameters and Principles Statement [REP1-030]**. The Applicant has confirmed with the EA that the minimum freeboard for panes within identified areas of flood risk will be increased from 200mm to 300mm. A small number of panels will require raising above the minimum 800mm height to provide a 300mm freeboard above the maximum modelled flood level. They have also updated Table 1 of the **Design Parameters and Principles Statement [REP1-030]** to secure this mitigation. It should be noted that raising the minimum height of the bottom edge of the panels in these areas would not require the
2.4.13	In accordance with the latest climate change peak rainfall intensity allowances, a climate change allowance should be incorporated into the surface water management scheme. All developments should use the upper end to assess the potential flood risk implications in the design rainfall event including whether there is any increased flood risk to third parties as a result of the development.	
2.4.14	Hydraulic calculations are required to demonstrate that the SuDS features have capacity for firefighting and subsequent storm events. The applicant must also consider remediation methods of the proposed SuDS features, including the length of time this may take and the management of surface water in the interim.	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		maximum height of the top edge of the panels to increase above 3m in these areas.
2.4.15	Decommissioning Phase Impacts Negative: Increased flood risk, erosion, detriment to water quality - Whilst the proposed sediment control measures such as silt fencing, filter strips, silt matting, settlement ponds, and check dams, are sufficient and supported by the LLFA, the applicant must identify pollution risk areas and demonstrate that these measures address surface water runoff from all relevant construction areas ensuring that surface water treated is prior to discharge.	Please refer to the Applicant's response to paragraph 2.4.7 of CCC's LIR above.
2.4.16	Mitigations required: Mitigation measures proposed are sufficient. Further details, such as a construction/decommissioning surface water drainage plan is required to demonstrate that the proposed mitigation measures are located strategically and address surface water runoff from all construction areas ensuring the required volumes, rates and level of water quality treatment is provided prior to discharge.	
2.5.1	Traffic and Transport (ES Chapter 9 Traffic and Transport) Summary The effects of construction and operational traffic from the proposed facility upon the existing highway network, for which council is the Local Highway Authority (LHA) responsible, need to be assessed and appropriate mitigation and compensation will need to be provided to the LHA.	This is noted by the Applicant.
2.5.7	Policy Context There are several national and local policies that are relevant to the DCO proposal that the Applicant must consider and address, these include, but are not limited to:	The policies, strategy and guidance referred to in paragraphs 2.5.7 -2.5.25 have been noted by the Applicant and have informed their assessment where relevant.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.26	No permanent signal junctions are proposed as part of the works. The proposed temporary signal junctions will need approval from the street works team in relation to implementation. The proposed accesses are simple in form and do not require a safety audit as there is no change from line and level of the existing road network	This point is noted by the Applicant.
2.5.27	Negative: The LHA considers the negative impact during the construction phase would be that of increased vehicle movements on the network and increased travel times. The Council's Transport Assessment team (See below Paragraphs 2.5.44 – 2.5.53) have indicated that the proposed level of movement associated with construction are not unacceptable on the highway network in capacity terms, noting construction traffic is 30 months.	The Applicant noted the Council's comments on this matter and welcomes confirmation from the Council that the proposed level of movement associated with construction is not unacceptable on the highway network in capacity terms.
2.5.28	Mitigations required: Proposed temporary speed limits and signal control at construction accesses to allow movement from the proposed accesses during the construction period.	The **Traffic Regulation Measures Plan [APP-011]** and **oCTMP (Figures 1 to 14 in Appendix D) [REP1-034]**. (Sheets 8 and 9) include proposals for temporary traffic management and temporary reduced speed limits where necessary. This is provided in Article 17 and Schedule 8 of the draft DCO [REP1-005] and requirement 8 in Schedule 2 of the draft DCO.
2.5.29	A pre and post condition survey should be included for the surrounding road network utilised by construction traffic and made part of the proposals within the outline Construction Traffic Management Plan (oCTMP). The CTMP is secured in requirement 8 [PDA-005], to be substantially in accordance with the oCTMP and approved by the local planning authority in consultation with the relevant highway authority. Any damage caused by the construction traffic to the highway network will need to be repaired at no expense to the LHA.	The Applicant notes CCC's requirement for preconstruction condition surveys of affected PROW routes. A commitment to undertaking these has been included within the **outline Construction Traffic Management Plan [REP1-034]**. The Applicant has also amended the oPROWMP to introduce a new sub-section on surfacing and reinstatement of PRoW at paragraphs 5.1.6 to 5.1.8 of the **oPROWMP [REP1-042]**. This requires the Applicant to provide detailed surfacing details of each PRoW alongside the final PRoW Management Plan.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.30	The proposed accesses within Cambridgeshire Highway Authority area will need to be constructed in accordance with geometric standards to allow for the largest vehicles likely to enter and exit the site simultaneously in accordance with DMRB requirements relating to vehicle-to-vehicle visibility.	**Requirement 8 (Construction traffic management plan) of the draft DCO [REP1-005]** provides that no phase of the authorised development may commence until a construction traffic management plan ("**CTMP**") for that phase has been submitted to and approved by the local planning authority in consultation with the relevant highways authority. The CTMP submitted be in substantial accordance with the **outline CTMP [REP1-034]** to the extent applicable to that phase, which includes a number of measures relating to local highways. For example, Section 5 of the management plan set outs details of the proposed construction access strategy, including situations where the design of accesses will be agreed with the local highway authority post-consent.
2.5.31	The council will require the works to the highway to be delivered via protective provision to capture that of Section 287/S38 with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991.	The Applicant has addressed this matter in detail in their response to Paragraph 11.1 of BBC's LIR.
2.5.32	The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991 requirements.	The Applicant notes this requirement.
2.5.31	Highway Development Management: Operational Phase Impacts Neutral: Operational vehicle movements are considered low and in relation to the construction phases and would therefore not be considered an issue.	The applicant welcomes acknowledgement of the low operational phase vehicle movement and that it is not an issue.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.32	Negative: The at scale replacement of PV panels and batteries is considered to produce a level of construction traffic where negative impacts may be felt. The council needs more information as to the projected traffic generation and over what timescales for the replacement of PVs and batteries at scale. It needs to be identified which construction accesses will be reinstated, use of the internal haulage and need for Temporary Traffic Regulation Orders.	As set out in the Applicant's response to Matters 2 and 3 of BBC's LIR. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken and is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.
2.5.33	Mitigations required: Recognising the replacement at scale of PV panels and batteries as a phase of development would under requirement 8 would mean a Construction Traffic Management Plan is required for approval by the local planning authority in consultation with the LHA before works, or any associated site preparation works (including reinstatement of accesses etc.) commences.	The **oOEMP [REP1-036]** secured by way of requirement 9 in Schedule 2 of the draft DCO proposes a triggered approval process: before any replacement activity involving more than 20% of the solar panels, the undertaker must submit a notification to the relevant local planning authority for approval, setting out the management measures to be put in place. Those measures must be consistent with the principles of the approved / final CEMP, PRoW Management Plan, CTMP and OEMP (and any other relevant management plans) but proportionate to the scale of the replacement activity.
2.5.34	For any works to reinstate accesses will need to be constructed to a suitable standard in both construction and geometry for the type of vehicles associate with the operation phase. This to be via proposed protective provision with the LHA to capture that of Section 287/S38 with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991.	The Applicant recognised that the draft DCO includes a number of powers that will allow it to carry out works within the public highway, such as article 10 (Street Works), Article 12 (Power to alter layout, etc, of streets) and Article 14 (Access to Works) The propsoed works are explicitly authorised by the draft DCO being shown on the Street Works, Rights of Way and Access Plan [APP-010] and described in the relevant schedule of the draft DCO. These works will be governed by the measures set out in the draft DCO and the relevent management plans, and provide sufficient protection to the local highway authority, therefore, strictly speaking additional protective provisions or a separate agreement are not

Para Ref.	CCC Local Impact Report Comment	Applicant Response
		necessary as works would be carried out according to the draft DCO [EREP1-005] with the consent of the relevent street or highway authority. The applicant will continue to engage with CCC on this matter.
2.5.35	Proposed temporary speed limits and signal control at construction accesses to allow movement from the proposed accesses during the decommissioning period.	See the Applicant's response to paragraph 2.5.28 of CCC's LIR above.
2.5.36	A pre and post condition survey should be included for the surrounding road network utilised by construction traffic within any final construction traffic management plan which should be conditioned.	See the Applicant's response to paragraph 11.3a of BBC's LIR above.
2.5.38	Highway Development Management: Decommissioning Phase Impacts Neutral: The proposed decommissioning accesses within Cambridgeshire will be designed in accordance with the D.M.R.B in relation to speeds correlating either to the posted speed of the road or from speed surveys undertaken and will be required to be geometrically suitable for two-way vehicles of the largest vehicles likely to be associated with the site.	The Applicant notes this point.
2.5.39	Negative: The LHA considers the negative impact during the decommissioning phase would be that of increased vehicle movements on the network and increased travel times. See Transport Assessment comments below (Paragraphs 2.5.44 – 2.5.53)	The Applicant notes this point.
2.5.40	Mitigations required: The Decommissioning Traffic Management Plan (DTMP), part of requirement 18 decommissioning and restoration, [PDA-005]), is	It will be a requirement of the final DEMP for any decommissioning phase works to be the subject of discussion and agreement with the relevant host local planning authorities.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	drafted for approval by the local planning authority. It is asked the LHA is consulted on the DTMP.	
2.5.41	For any works to the highway will need to be constructed to a suitable standard in both construction and geometry for the type of vehicles associate with the decommissioning phase. This to be via proposed protective provision with the LHA to capture that of Section 287/S38 with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991.	The Applicant notes these comments. The matters the Council is seeking to be addressed are all accounted for in the oDEMP.
2.5.42	Proposed temporary speed limits and signal control at construction accesses to allow movement from the proposed accesses during the decommissioning period. The works on the highway network will need to be subject to a road space booking process, administered by the County Council's Street Work's team in line with New Roads and Street Works Act 1991 requirements.	
2.5.43	A pre and post condition survey should be included for the surrounding road network utilised by construction traffic within any final construction traffic management plan which should be conditioned.	See the Applicant's response to paragraph 11.3a of BBC's LIR above.
2.5.44	Transport Assessment: Construction Phase Impacts Neutral: There are no significant concerns in respect of the volume of traffic during the construction period as the staff movements will be during the AM and PM peak shoulders and not the peak hours.	The applicant welcomes confirmation that the Council has no significant concerns in respect of the volume of traffic during the construction period.

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2.5.45	The staff occupancy is proposed to be 2 persons per car. Whilst we welcome the target, it is challenging. The council would like to see more detail as to the measures to reach this and further measures to implement if 2 persons per car is not met.	An outline Construction Workers Travel Plan has been prepared and was submitted as Appendix B of the updated **oCTMP [REP1-034]** which was submitted at Deadline 1. This sets out a framework for how the final CWTP will be monitored and implemented. The Applicant will continue to consult with BBC on the detail of this matter, which would be finalised upon discharge of the DCO Requirements.
2.5.46	Negative: There does not appear to be a routing management plan for the general Heavy Goods Vehicle (HGV) traffic with the exception of Abnormal Indivisible Loads (AILs) which are dealt with in the Transport Assessment Chapter.	The HGV routing strategy is set out within Section 5.0 of the **oCTMP [REP1-034]**, which is secured under Requirement 8 of the **draft DCO [REP1-005]**. This clearly identifies that HGVs will route directly to the Site from the A1 via the B645 Kimbolton Road, which is of a suitable standard to accommodate two-way HGV movements. It is proposed to construct a network of internal haul roads to allow HGV movements around the Site, to avoid the need to route HGVs along unsuitable roads or through centres of population.
2.5.47	It is noted that any vehicles travelling southbound on the A1 to access the B645 would pass northbound along part of the Old Great North Road which is a residential area. Whilst this road may well have sufficient capacity to cater for HGVs there is a significant impact for residents.	
2.5.48	Mitigations required: The outline Construction Traffic Management Plan (oCTMP), [APP-156] need to detail a routing plan for all vehicles, to include HGVs routing from the wider highway network. The oCTMP [APP-156] needs to commit to measures to monitor and enforce the routing plan. This is to include public engagement and communication throughout the construction process.	
2.5.49	It is requested that the routing plan should direct HGVs traveling southwards on the A1 to the Wyboston junction and then return northwards to the A645 junction. In doing so this avoids the residential area on the east site of the A1/B645 junction.	
2.5.50	Transport Assessment: Operational Phase Impacts Negative: The at scale replacement of PV panels and batteries is considered to produce a level of construction traffic where	As set out in the Applicant's response to Matters 2 and 3 of BBC's LIR. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken and is preparing a standalone Technical Note providing more clarity on these works, the

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	negative impacts may be felt. The council needs more information as to the projected traffic generation and over what timescales for the replacement of PVs and batteries at scale.	potential environmental effects, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.
2.5.51	Mitigations required: Please see paragraph 2.5.33 above.	See the Applicant's response to paragraph 2.5.33 of CCC's LIR above.
2.5.52	Transport Assessment: Decommissioning Phase Impacts Negative: There will be impacts for a period of time associated with increased traffic movements similar to that raise above for construction.	The Applicant notes the Council comments and confirms the **draft DCO [REP1-005]** includes a decommissioning traffic management plan as part of requirement 18.
2.5.53	Mitigations required: The council notes the decommissioning traffic management plan is proposed to be submitted as part of requirement 18 [PDA-005] for approval by Bedford Borough Council and Huntingdonshire District Council. This needs to be in consultation with the LHA.	
2.5.54	Public Rights of Way: Construction Phase Impacts Negative: It is likely that all PROW in the vicinity of solar arrays and associated infrastructure will be subject to general construction noise.	**ES Vol 1 Chapter 10 Noise and Vibration [APP-046]** assesses noise effects on Public Rights of Way (PRoW) for the construction phase it concludes that, while users of some PRoW close to active works could experience temporary changes in noise levels, these would be short-term and transitory, controlled through best practicable means, and the resulting effect would not be significant in EIA terms.
2.5.55	Users will be negatively affected by construction traffic both where PROW are used as construction routes and at crossover points. Users will be subject to noise, and potentially dust and mud as a result of construction traffic.	The Applicant recognises that dust and mud/track-out could affect PRoW users during construction, particularly where construction traffic uses sections of PRoW as access routes or where PRoW are close to construction activity. This is addressed through a combination of PRoW management measures in the Outline PRoW Management Plan **[REP1-032]** and dust/dirt control measures within the **oCEMP [REP1-032]**

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.56	Users of PROW 112/7 and 112/8 will be diverted during the construction phase.	This point is noted by the Applicant.
2.5.57	The safety measures where construction traffic interact with PROW appear to be limited to placing signage. This may be insufficient to protect PROW users.	This is not correct measures would also include the use of banksmen where this is deemed necessary.
2.5.58	Public Footpaths 213/3, 213/28 will have a Moderate to Major Adverse (Significant) impact on the quality and character of the available view during the construction phase.	**ES Vol 1 Chapter 5 (Landscape and Visual) [APP-041]**, records that: • Footpath 213/3 (Parish of Great Staughton) (Viewpoint 64) is assessed as Minor Adverse (Not Significant) during construction . • Footpath 213/28 (Parish of Great Staughton) (Viewpoint 83, beside the River Kym) is assessed as Moderate to Major Adverse (Significant) during construction . Thus, the Councils statement is only correct for Footpath 213/28 and is not correct for Footpath 213/3 which would not be the subject of significant effects.

2.5.59	Public footpaths 213/1, 112/5, 112/6, 112/7 and 112/8 will have a Major Adverse (Significant) impact on the quality and character of the available view during the construction phase.	This is not agreed by the Applicant. **ES Vol 1 Chapter 5 (Landscape and Visual) [APP-041]** does not conclude that the effect on these rights of way would be 'Major Adverse' from any assessment viewpoint, moreover some of the footpaths listed have not actually been the subject of assessment as separate representative viewpoint receptors, specifically:
		• Footpath 213/1 is assessed at several representative viewpoints with different outcomes, including
		  ○ Negligible (Not Significant) at one location (Viewpoint 53)
		  ○ Moderate to Major Adverse (Significant) at another location adjacent to the Scheduled Monument (Viewpoint 54),
		  ○ with other 213/1 viewpoints assessed as Minor or Moderate Adverse (Not Significant) .
		• Footpath 112/5 (Hail Weston) is assessed as Moderate to Major Adverse (Significant) at one representative viewpoint (Viewpoint 71) but is assessed as Moderate Adverse (Not Significant) at other representative viewpoints on the same footpath (Viewpoints 71 and 78) .

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		• Bridleway 112/7 (Hail Weston) is assessed as Moderate to Major Adverse (Significant) at one representative viewpoint (Viewpoint 68) but elsewhere is reported as Moderate Adverse (Not Significant) (for example Viewpoint 77) . • Footpaths 112/6 and 112/8 are not shown as separate representative viewpoint receptors
2.5.60	Mitigations required: There should be regular condition surveys/inspections throughout the construction of the project to ensure that PROW within the development are safe and usable. If they are becoming unsafe then remedial works must be carried out to resolve. The council requires the Applicant to restore all affected PROW to their pre-construction condition, or to another specified condition agreed between the parties in accordance with legal requirements. These requirements should be clearly set out in the oCTMP [APP-156] or oPRoWMP [APP-160].	The Applicant notes CCC's requirement for preconstruction condition surveys of affected PROW routes. A commitment to undertaking these has been included within the **oCTMP [REP1-034**]. The Applicant has also amended the oPROWMP to introduce a new sub-section on surfacing and reinstatement of PRoW at paragraphs 5.1.6 to 5.1.8 of the **oPROWMP [REP1-042]**. This requires the Applicant to provide detailed surfacing details of each PRoW alongside the final PRoW Management Plan.
2.5.61	Details of signing and advance noticing in relation to any temporary PROW closures or diversions should be clearly set out in a CTMP or RoWMP and agreed with the LHA.	The Applicant notes these requirements for existing PRoW and for the creation of permissive paths. The detailed specifications sought (including route alignments, widths, surfacing, signage and waymarking, and the programme and arrangements for ongoing maintenance and vegetation management) will be provided through the final PRoW Management Plan and the final Landscape and Ecological Management Plan (LEMP) submitted for approval in accordance with Requirements 11 and 4 (respectively) of the **draft DCO [REP1-005]**.
2.5.62	Road Safety Audits requested for every point where construction traffic intersects with PROW. Measures put in place to slow construction traffic where crossing PROW.	The Applicant is not specifically proposing Road Safety Audits for the interfaces between construction access routes/junctions and PRoW crossings. Instead, they are proposing to manage safety at PRoW crossings through operational control measures, including, physical separation and control at crossings, Warning signage and (where required) banksmen and Temporary localised diversions.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.63	Public Rights of Way: Operational Phase Impacts Neutral: There is a DMMO application to record a bridleway which crosses the application boundary. Construction and operation of the development may hinder the opening of any additional user rights that may be determined to exist following the investigation of the DMMO application.	The Applicant is aware of one DMMO application that intersects the Site (Case Number M206 - LH) to create a bridleway. The Applicant would not object to the creation of a public right of way along this route. The Applicant notes that along the relevant eastern edge of Site D, the alignment of the potential DMMO along the existing access track would sit outside of the Order limits. The DMMO would not be impeded by the Scheme and would pass adjacent to the proposed woodland belt planting along that edge.
2.5.64	Negative: Visual amenity impact, LVIA [App-073]. A number viewpoints are recognised to suffer from long-term adverse impacts. While many of these remain Minor, or Minor-Moderate, it remains the case that some sites will still experience a significant adverse impact even after 10 years of operation of the development.	This is noted and accurate. The Applicant's assessment of Landscape and Visual Effects in **ES Vol1 Chapter 5 [APP-041]** identifies that significant visual effects will remain to some PROWs after 10 years and specifically: • Bridleway 37 and Bridleway 40, and Footpaths 34 and 35 (southern extent of Site A) • Footpaths 4, 8, 13, 26 and 47 (within Site B) • Footpaths 5 and 20 (near Pertenhall on slightly elevated ground, at least 1 km north of Sites A and B) • Footpaths 5 and 213/1 (near Little Staughton on slightly elevated ground within 1 km south of Site B)
2.5.65	Within Cambridgeshire: At year 10, Public footpath 213/1 (Viewpoint 51) will have a Moderate to Major Adverse (Significant) impact on the quality and character of the available view. Mitigation planting is acknowledged as being insufficient to offset this negative impact on PROW users.	
2.5.66	A Moderate impact is also noted at year 10 for viewpoints 71, 77 and 78. While this is noted as a 'not significant' impact, the document also notes that mitigation planting would result in a view that is "more restricted than the baseline situation". Irrespective of whether the impact is considered significantly adverse or not, it remains the case that the character of the views offered at points 71, 77 and 78 are changed adversely in the long term.	The Secretary of State would need to balance any negative effects of the Scheme against the scheme benefits when deciding whether the overall planning balance is in favour of the Scheme.
2.5.67	Where PROW are used as access to the site there may be some infrequent traffic potentially impacting on the users of the PROW.	As noted in the Applicant's response to paragraph 2.5.62 of CCC's LIR above, a range of measures are proposed to ensure the safety of users of the PRoW network during the construction phase including the PRoW that would be used for construction access.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.68	The at scale replacement of PV panels and batteries is considered to produce a level of construction traffic where negative impacts may be felt. The council needs more information as to the impact on PROW and over what timescales.	As set out in the Applicant's response to Matters 2 and 3 of BBC's LIR. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken and is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.
2.5.69	Mitigations required: Any additional proposals to screen the development from affected routes would be welcomed. Screening should be positioned such that the countryside views from adjoining PROW are not restricted.	The Applicant has addressed this matter in their response to paragraph 12.8 of BBC's LIR.
2.5.70	The long-term impact of the development on PROW users should be mitigated through the provision of improved PROW and non-motorised user access options. • Provision of new permissive routes, or increased status of permissive routes. The Applicant's proposals for providing permissive access routes have not been defined: this needs to be provided and considered before we can understand if it offers appropriate mitigation for the development. • Facilitating improved PROW and non-motorised user connections between rural communities in the vicinity of the development. This would help to satisfy NPPF para 105 and the Cambridgeshire ROWIP by delivering enhancements to the local PROW network. The following options should be given consideration and the council would welcome engagement: ▪ Improved east-west connectivity to enable access from rural communities to St Neots and the National Cycle Network (NCN) at Hail Weston ▪ North-South connectivity to Grafham Water. ▪ Improvements to pre-existing PROW infrastructure.	The Applicant has addressed this matter in their response to paragraph 17.10 of BBC's LIR.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	▪ The council understands that a suite of proposed PROW enhancements has been submitted by Bedford Borough Council and is supportive of these ambitions.	
2.5.71	DMMO - Without prejudice, the council requests that a 7-metre-wide corridor is kept available along the line of the DMMO application route through the proposed development, to ensure that access can be easily facilitated in future, should the DMMO be confirmed.	As noted in the Applicant's response to paragraph 12.5.63 of CCC's LIR the alignment of the potential DMMO along the existing access track would sit outside of the Order limits, would not be impeded by the Scheme and would pass adjacent to proposed woodland belt planting along that edge. There would be a greater than 7m separation between the scheme and the DMMO.
2.5.72	Recognising the replacement at scale of PV panels and batteries as a phase of development would under requirement 11 mean a PROWMP is required for approval by the local planning authority in consultation with the LHA before works, or any associated site preparation works (including reinstatement of accesses etc.) commences.	See the Applicant's response to paragraph 2.5.33 of CCC's LIR above.
2.5.73	There should be regular condition surveys/inspections throughout the at scale replacement works to ensure that PROW within the development are safe and usable. If they are becoming unsafe then remedial works must be carried out to resolve.	See the Applicant's response to paragraph 2.5.29 of CCC's LIR above.
2.5.74	Road Safety Audits requested for every point where construction traffic for the at scale replacement intersects with PROW. Measures put in place to slow construction traffic where crossing PROW.	See the Applicant's response to paragraph 2.5.62 of CCC's LIR above.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.5.75	Public Rights of Way: Decommissioning Phase Impacts Negative: It is likely that all PROW in the vicinity of solar arrays and associated infrastructure will be subject to general construction noise.	The Applicant notes these points.
2.5.76	Users will be negatively affected by construction traffic both where PROW are used as construction routes and at crossover points. Users will be subject to noise, and potentially dust and mud as a result of construction traffic.	
2.5.77	The safety measures where construction traffic interacts with PROW appear to be limited to placing signage. This may be insufficient to protect PROW users.	
2.5.78	Mitigations required: There should be regular condition surveys/inspections throughout the decommissioning works to ensure that PROW within the development are safe and usable. If they are becoming unsafe then remedial works must be carried out to resolve	See the Applicant's response to paragraph 2.5.29 of CCC's LIR above.
2.5.79	Road Safety Audits requested for every point where construction traffic intersects with PROW. Measures put in place to slow construction traffic where crossing PROW.	See the Applicant's response to paragraph 2.5.62 of CCC's LIR above.
2.6.1	Noise and Vibration (ES Chapter 10) Summary Huntingdonshire District Council are the appropriate authority to inform the impact of noise and vibration in detail. However, as it relates specifically to PROW users the following is provided in this LIR.	See the Applicant's response to paragraph 2.5.54 of CCC's LIR above.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.6.2	Operational Phase Impacts Negative: As it relates to PROW equestrian users inverter buildings near PROW may transfer sound that unsettles horses.	
2.6.3	Mitigations required: As it relates to PROW equestrian users it is requested that any inverter buildings or other electrical equipment near PROW be constructed to minimise transfer of sound that horses are sensitive to. Operational noise assessment (Requirement 12 of the DCO [PDA-005]) should include an assessment of the noise from inverters or other electrical equipment and the frequencies to which horses are sensitive to. Suitable mitigation measures need to be implemented.	
2.7.1	Land and Soils (ES chapter 13 Land and Soils) Summary The Council, in its role as Minerals and Waste Planning Authority has interest in the Safeguarding of Mineral Resources	The Applicant notes this point.
2.7.1	Planning Statement [APP-031], 7.16.5 and 7.16.6 explains that: *"An assessment of the impact of the Scheme on safeguarded minerals resource is set out within Planning Statement Appendix B – Mineral Safeguarding Report [EN010141/DR/5.3], and ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]. The assessment identifies that the Order Limits lie partially within areas that have been allocated by BBC and CCC as Mineral Safeguarding Areas.*	The Applicant notes and welcomes the Councils conclusions on this matter.
2.7.2	*As set out within Planning Statement Appendix B [APP-031] – Mineral Safeguarding Report and within Section 13.8 of ES Vol 1 Chapter 13: Land and Soils [APP-150], the Scheme would be temporary in nature and decommissioned after 40 years. Any impacts caused by the Scheme related to land use are considered*	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	reversible. The minerals within the Order Limits would not be permanently sterilised, and post decommissioning, the land could be worked for minerals if required. Thus, the Scheme is considered to meet the requirements of NPS EN-1, Policies MSP 11 and 12 of the MWLP: SSP, and Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan." Policy 5 is correctly identified.	
2.7.3	The Council, in its role as Minerals and Waste Planning Authority is generally content with the accuracy of the assessment and conclusion reached.	
2.7.4	It is noted that in paragraph 2.4.4 of the Outline Decommissioning Environmental Management Plan (oDEMP) [REP1-038] it is explained that *"Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would typically be made safe and left in situ to reduce the environmental impact of excavation"*. The oDEMP needs to identify sections of underground infrastructure that poses a risk of adverse environmental impacts if extracted to justify being left in situ with a record shared with the Minerals and Waste Planning Authorities. All other sections should be removed.	On this matter the Applicant notes the Environment Agency's Relevant Representation, reference EA008 in relation to Table 6 of the oWMP, where the EA do not raise objection to the Applicant's approach to decommissioning buried infrastructure, instead noting: "*We accept this is current standard practice, but allowance should be made for removal of all elements of the scheme if that is best practice at the time. While legislation should always be followed, works in addition to this may be required to ensure the best environmental outcomes*." In response to the EA's comments, the Applicant has updated the **oDEMP [REP-038]** to take into account of contemporary best practice and regulatory guidance at the point of decommissioning, whilst assessing the environmental implications of removing versus retaining sub-surface infrastructure. The Applicant has also updated the **oDEMP [REP-038]** to clarify that the cable jointing chambers associated with the grid connection will be removed from the ground during the decommissioning phase.
2.7.5	Policy Context Cambridgeshire and Peterborough Minerals and Waste Local Plan - Policy 5	This is noted by the Applicant.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.7.6	Construction Phase Impacts Neutral: Cabling is to be placed underground for the duration of the project.	This is a matter that would need to be discussed and agreed at the point of decommissioning.
2.7.7	An estimate of the materials likely to be required for construction, for example to establish the internal haulage route is needed to ensure there are no significant impacts.	
2.7.8	Mitigations required: A record of underground infrastructure to be submitted to the Minerals and Waste Planning Authority at the time of construction and after decommissioning.	
2.7.9	It would aid the council in its monitoring of the minerals use for the Applicant to provide an estimate of the aggregates likely to be required for this project.	
2.7.10	Operational Phase Impacts Neutral: The proposed development will result in temporary sterilisation of mineral resource.	Please refer to the Councils comments at paragraphs 2.7.1 - 2.7.3 above
2.7.11	Mitigations required: Scheme to be decommissioned and land restored to uses prior to development at end of life.	
2.7.12	Decommissioning Phase Impacts Negative: Potential damage through the extraction of underground infrastructure, in particular with regard to archaeology.	Please refer to the Applicant's response to paragraphs 2.2.23 and 2.2.24 of CCC's LIR.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.7.13	Mitigations required: The Decommissioning Environmental Management Plan needs to identify sections of underground infrastructure that poses a risk of adverse environmental impacts if extracted to justify being left in situ. All other sections of underground infrastructure should be removed. All other sections should be removed. As part of the DEMP below ground infrastructure left in situ needs to be recorded, and plans showing the location of any underground infrastructure are sent to the Minerals and Waste Planning Authorities for its' records.	Please refer to the Applicant's response to paragraphs 2.7.4 of CCC's LIR.
2.8.1	Socio-Economics (ES Chapter 14) Summary Huntingdonshire District Council will be commenting on socio-economic matters in detail. Cambridgeshire County Council's comments below are in addition as they interact with roles within the council related to communities and education.	The Applicant notes this point.
2.8.2	Construction Phase Impacts Positive: Skills & Employment – opportunity for young people to have an insight to the industry, site visits and engagement activities. Opportunities for the employment of local people and apprenticeships.	The applicant welcomes and concurs with these comments.
2.8.3	Negative: Potential risk of increased antisocial behaviour and organised crime linked to construction site and high value equipment.	The Scheme design incorporates appropriate security measures in line with industry best practice, including perimeter fencing, monitored access points, and CCTV. These measures are intended both to protect the facility and to deter unauthorised access. The Applicant will also liaise with the local police and to ensure that security measures and responses are proportionate and effective. These measures would be delivered through a number of different documents and management plans including the **oOEMP [REP1-036], Design Parameters and Principles Statement [REP1-030] a**nd **oBSMP [APP-162]**.
2.8.4	Mitigations required: On site security to reassure community and act as deterrence. Engagement and liaison with Local Community Safety Partnership. This to inform the proposed fencing and other means	

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	of enclosure to be provided under requirement 13 [PDA 005] as part of detailed design, requirement 3 [PDA-005]).	
2.8.5	Operational Phase Impacts Positive: The Council considers there is the potential for a positive effect on the economy but appropriate provision must be made to deliver employment, skills and education benefits/opportunities locally to realise this. This is to include an educational programme to support science, technology, engineering, and mathematics (STEM) curriculum and careers education with local schools and colleges.	The Applicant has addressed this matter in their response to paragraph 17.5 of the BBC LIR.
2.8.6	Neutral: Community benefit fund is outlined in the planning statement [APP-031] paragraph 5.5.3. Funding enables community groups and projects to thrive. However, it is acknowledged this is not to be taken into account within the planning balance and is not considered as part of the planning decision.	The Applicant agrees with this statement.
2.8.7	Short term jobs and employment linked to at scale replacement of PV panels and batteries.	The Applicant agrees with this statement.
2.8.8	Mitigations required: The Outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163] currently lacks specific detail on needs addressed, initiatives and a delivery programme to maximise benefits. This should include consideration towards employment at construction/operation/at scale replacement and decommissioning phases.	The **outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163]** establishes the framework for maximising local employment, training and supply chain benefits from the Scheme. Further detail on specific apprenticeship initiatives, skills programmes and engagement with local education and training providers will be developed within the Skills, Supply Chain and Employment Plan (SSCEP) to be prepared in accordance with Requirement 19 of the **draft DCO [REP1-005]**. This requirement secures the preparation of a SSCEP, following consultation with the relevant local authorities, prior to commencement of construction, ensuring that locally focused skills and training opportunities are fully embedded in project delivery.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.8.9	Decommissioning Phase Impacts Neutral: Short term jobs and employment linked to decommissioning of site.	The Applicant agrees with this statement.
2.8.10	Negative: Potential risk of increased antisocial behaviour and organised crime linked to construction site and high valuable equipment.	The Scheme design incorporates appropriate security measures in line with industry best practice, including perimeter fencing, monitored access points, and CCTV. These measures are intended both to protect the facility and to deter unauthorised access. The Applicant will also liaise with the local police and to ensure that security measures and responses are proportionate and effective. These measures would be delivered through a number of different documents and management plans including the **oOEMP [REP1-036], Design Parameters and Principles Statement [REP1-030] a**nd **oBSMP [APP-162]**.
2.8.11	Mitigations required: On site security to reassure community and act as deterrence. Engagement and liaison with Local Community Safety Partnership. Secure fencing and enclosure details should be part of the outline Decommissioning Environmental Management Plan (oDEMP) [REP1-038]. The DEMP is to be submitted for approval as part of requirement 18 [PDA-005].	
2.9.1	**Climate Change (ES Chapter 15)** Policy Context The UN Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) confirms that there is "unequivocal" scientific consensus that human-induced climate change is already happening and will continue to increase. Limiting this requires deep reductions in GHG emissions. The Paris Agreement reached by the United Nations (UN) Climate Change Conference in 2015 (COP21), is an international treaty signed by 194 parties, which sets the goal to "*substantially reduce global greenhouse gas emissions to limit the global temperature increase in this century to 2 degrees Celsius while pursuing efforts to limit the increase even further to 1.5 degrees*". To keep global warming to	The Applicant notes and agrees with the relevant policy context set out in paragraphs 2.9.1 – 2.9.4.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	no more than 1.5°C, GHG emissions need to be reduced by 45% from 2010 levels by 2030 and reach net zero by 2050.	
2.9.7	Construction Phase Impacts Negative: A range of emissions sources have been identified as part of the construction phase. While the initial surveys indicate peat is unlikely to be found, the risk of this has been identified. The resulting impact on peatland and associated GHG emissions have not been adequately identified, nor is the identified mitigation of halting the scheme "until a suitably qualified ecologist has inspected the Site" as there is no information about what actions would be taken next.	The Applicant has already addressed this point in their response to paragraphs 18.12 – 18.13 of BBC's LIR.
2.9.8	Mitigations required: Full integration of peatland emissions management should be required as part of Construction Environmental Management Plan, along with recalculation of associated carbon emissions arising from the scheme – alongside recalculation of the schemes overall carbon benefit, given this scheme's rationale being largely grounded in delivery of national decarbonisation and emissions reductions.	
2.9.9	While mitigations have been outlined in the ES Chapter 15 'Climate Change' [APP 116], paragraph 15.9.2, these are only described as measures 'identified' and 'could' reduce GHG during the detailed design phase. There remains a lack of certainty that they will be implemented and without monitoring and reporting in place, assurance GHG are further reduced. It should be part of the DCO requirement 3, detailed design [PDA-005] that the applicant submit and updated Greenhouse Gas Emissions Assessment [APP-116] to demonstrate that the identified (and any	This point is not accepted by the Applicant. Paragraph 15.9.2 starts off by stating: "*This assessment has identified that the Scheme is considered to have a beneficial effect and is fully in line with measures necessary to achieve the UK's trajectory towards net zero and therefore no additional mitigation is required.*" Only then does it go on to identify other measures which could further minimise GHG emissions. Thus, they are not essential as no additional mitigation is required. However, they are measures that could be optimised through the **oCEMP [REP1-032]**, this includes measures to ensure optimisation of the measures set out by the Council.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	future identified) mitigations have been implemented to reduce emissions.	
2.9.10	Operational Phase Impacts Positive: Generation of electricity throughout the project lifecycle. Overall positive impact, reducing net GHG emissions and contributing to net zero polices.	The Applicant notes and welcomes this comment.
2.9.11	Neutral: Lifecycle replacements have been incorporated into the project, however these have been limited to warranty and incorporated into the “the typical warranty of the equipment”. No consideration has been provided for additional replacements. While this is largely a suitable assumption for the GHG baselining purposes, additional replacements are likely to be required.	The Applicant considers that reliance on the timescales set out within the warranties is an appropriate basis for the assessment. To carry out the assessment any other way would be highly speculative.
2.9.12	Negative: There are no neutral impacts identified for the construction phase with regard to climate change.	The Applicant notes this comment.
2.9.13	Mitigations required: It would be beneficial to establish a mechanism to monitor lifecycle replacement of equipment against the assumptions within the baseline. Should replacements be required to a level significantly higher than assumed, this should trigger a new Greenhouse Gas Emissions Assessment [APP-116] to provide assurance that the project remains an overall positive contributor to reducing GHG emissions and net zero polices.	It is unclear how this would work in practice. What would be the purpose of the updated assessment?
2.9.14	Decommissioning Phase Impacts Neutral:	Please refer to the Applicant’s response to Paragraph 3.32 of BBC’s LIR which addresses this matter.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	The detailed Decommissioning Environmental Management Plan will need to demonstrate maximising the recycling material removed from the site.	
2.9.15	Negative: There are no positive impacts identified for the decommissioning phase with regard to climate change.	The Applicant notes this point
2.9.16	Mitigations required: Requirement 18, decommissioning and restoration, to include a revised Greenhouse Gas Emissions Assessment [APP-116] to complete the lifecycle assessment as proposed in ES Chapter 15 'Climate Change' [APP-116], paragraph 15.9.2.	The Applicant notes this comment and welcomes further discussion on the practicality and / or benefit of including this provision.
2.10.1	Health (ES Chapter 16 Other Environmental Topics) Policy Context Section 8 of the NPPF paragraph 96 states Planning policies and decisions should aim to achieve healthy, inclusive and safe places: c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.	The Applicant notes and agrees with the relevant policy context set out in paragraphs 2.10.1 – 2.10.3.
2.10.4	Construction Phase Impacts Neutral: The commitment to setting up a Community Liaison Group at the outset of construction is noted in table 16 [APP-052]. This is to maintain open channels of communication between developer and the community and guard against potential health inequalities.	The Applicant notes this comment.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
	The Construction Environmental Management Plan, Construction Traffic Management Plan, Battery Safety Management Plan, and Waste Management Plan are all responsible for detailing the management of impacts from noise, vibration, dust, battery safety and waste management and to navigate potential impacts on human health.	
2.10.5	Mitigations required: All mitigations detailed are essential such as managed work hours, dust suppression etc in identified plans, sustainable construction methods including the considerate constructor's scheme. These together mitigate impact on human health. Appropriate monitoring and enforcement, including finance to support, is required.	The Applicant notes this point.
2.10.6	Operational Phase Impacts Neutral: Currently neutral but there is potential for positive impacts during the lifecycle of the proposals from the 'Agrisolar Research Area' within East Park Site D. This can provide evidence and data to further understand how agriculture and solar development can co-exist on commercial solar installations.	The Applicant notes this comment.
2.10.7	Negative: There is the potential risk for negative impacts from unplanned atmospheric emissions from the Battery Energy Storage Systems in the result of a fire and also potential leachate.	The Applicant does not disagree that, were a BESS fire to occur, it could have the potential to affect human health without effective mitigation. However, a BESS fire is not an effect anticipated to arise during the normal operation of the Scheme. It is an unlikely event risk which is properly considered under the separate assessment of Major Accidents and Disasters (Section 16.4 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]**). The Applicant has already addressed the matter of fire water capture and disposal in their response to paragraph 14.1 of BCC's LIR.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.10.8	Mental Wellbeing has potential negatives based on the visual impacts on local amenity and character and access to the countryside. Whilst screening and planting is proposed impact by the proposals will be felt, particularly in the first 10 years.	Mental wellbeing has been considered as part of the assessment within Section 16.2 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052],** which considers potential impacts on both physical health and mental wellbeing. The purpose of Table 16.3 of [**APP-052]** is to provide a consolidated assessment summary which identifies the potential pathways between the Scheme and people (including pathways relevant to mental wellbeing), signposts where those matters are assessed and mitigated within the topic chapters and records the mitigation response and likely significance of health effects. The Applicant has considered potential mental health pathways (including stress, anxiety and worry) within the assessment and has also ensured that the underlying determinants which may influence mental wellbeing are assessed and mitigated through the relevant topic chapters and control documents. Table16.3 of **[APP-052]** concludes that, while direct significant health effects are not anticipated, perceptions of construction-related disturbance may give rise to worry, stress or anxiety for those closest to activity, and identifies that good communications and proportionate complaints handling are part of the measures to avoid significant effects.
2.10.9	The Cumulative impacts with other solar developments, namely Little Staughton Airfield Solar Farm, and High Wood Solar, Staploe are in the vicinity of East Park Solar and do form a degree of clustering that impacts the community negatively.	
2.10.10	Mitigations required: The Battery Energy Storage System - all mitigations should be addressed following best practice included in the outlined in the Battery Safety Management [APP-162], (requirement 10 of the DCO [PDA-005]) to be approved by the local planning authority in consultation with Cambridgeshire Fire and Rescue Service.	As per **draft DCO Requirement 10 [REP1-005],** prior to commencement of the Scheme, a Battery Safety Management Plan must be submitted in substantial accordance with the oBSMP [APP-162] and must be implemented as approved by the relevant local planning authority in consultation with CFRS. During preparation of the **oBSMP [APP-162]** the Applicant has consulted extensively with the CFRS (the service who would be responsible for dealing with a fire at the BESS) and also the Bedford Fire and Rescue Service (BFRS). The Applicant has already agreed a Statement of Common Ground with the **CFRS [PDA-019]** on fire safety matters relating to the BESS and the Scheme in general.
2.10.11	Improvements to the PROW network (See Traffic and Transport 2.5.70) to improve local amenity and mental wellbeing.	Please refer to the Applicant's response to paragraph 2.5.70 of CCC's LIR.

Para Ref.	CCC Local Impact Report Comment	Applicant Response
2.10.12	Decommissioning Phase Impacts Negative: Short term impacts of dust, noise, vibration, emissions from construction vehicles, machinery and waste materials from the redundant solar farm hardware impacting human health.	Please refer to the Applicant's response to paragraphs 2.10.8 and 2.10.9 of CCC's LIR.
2.10.13	Mitigations required: All mitigations detailed are essential such as managed work hours, dust suppression etc in identified plans, sustainable construction methods including the considerate constructor's scheme. These together mitigate impact on human health. Appropriate monitoring and enforcement, including finance to support, is required.	These mitigations would be delivered through the suite of management plans proposed by the applicant which would be enshrined in the wording of the DCO.
2.11.1	Waste (ES Chapter 16 Other Environmental Topics) Summary Section 6.3 Waste of the Environmental Statement addresses the topic of waste. The inclusion of estimated waste arisings, and their method of disposal is noted. It is further noted that an outline Waste Management Plan [APP-164] has been submitted. The council has no other comments on this topic at this time.	The Applicant notes and welcomes the Council's comments on this matter.

4.0 RESPONSE TO HUNTINGDONSHIRE DISTRICT COUNCIL'S LIR

Table 3: Response to Huntingdonshire District Council Local Impact Report (REP1-078)

Para Ref.	HDC Comments	Applicant Response
3.2	In Huntingdonshire the Development Plan (relevant to this project) consists of: - Huntingdonshire's Local Plan to 2036 (2019) - Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021) - Great Staughton Neighbourhood Plan (2021-2036) -	The Applicant agrees that this is the relevant Local Development Plan. Each document has been the subject of assessment in the Applicant's **Policy Compliance Document [APP-032].**
3.3	Huntingdonshire's Local Plan to 2036 - LP 2: Strategy for Development - LP 3: Green Infrastructure - LP 5: Flood Risk - LP 10: The Countryside - LP 11: Design Context - LP 12: Design Implementation - LP 14: Amenity - LP 15: Surface Water - LP 16: Sustainable Travel - LP 17: Parking Provision and Vehicle Movement - LP 29: Health Impact Assessment - LP 30: Biodiversity and Geodiversity - LP 31: Trees, Woodland, Hedges and Hedgerows - LP 34: Heritage Assets and their Settings - LP 35: Renewable and Low Carbon Energy - LP 36: Air Quality - LP 37: Ground Contamination and Groundwater Pollution	The Applicant agrees with the Council's list of relevant Local Plan Policies. Each has been the subject of assessment in the Applicant's Policy Compliance Document **[APP-032].**
3.4	Great Staughton Neighbourhood Plan (2021 to 2036) - GSNP 7 – Landscape and Townscape Characteristics - GSNP 9 – Great Staughton Conservation Areas	The Applicant agrees with the Council's list of relevant Neighbourhood Plan Policies. Each has been the subject of assessment in the Applicant's **Policy Compliance Document [APP-032].**

Para Ref.	HDC Comments	Applicant Response
	- GSNP10 – Designated and Non-Designated Heritage Assets - GSNP 11 – Biodiversity and Wildlife Habitats - GSNP 13 – Community-Led Renewable Energy Projects - GSNP 15 – Surface Water Flood Risk - GSNP 17 – Road Safety and Parking -	
3.5	Supplementary Planning Documents (SPDs) and other relevant guidance: - Landscape and Townscape SPD (2022) - Cambridgeshire Flood and Water SPD (2017) - Developer Contributions SPD (2011) - Developer Contributions: Updated Costs 2025/2026 - Huntingdonshire Strategic Flood Risk Assessment (2025) - Technical Advice Note: Environmentally Sustainable Design and Construction (2025) -	Please refer to the Applicant's response to paragraph 3.13 of BBC's LIR.
3.6	National Policy and Legislation National Policy Statements (NPS) - NPS EN-1 – Overarching National Policy Statement for Energy - NPS EN-3 – National Policy Statement for Renewable Energy Infrastructure - NPS EN-5 – Electricity Networks Infrastructure -	The Applicant agrees that these are the relevant NPS's, they have all been the subject of assessment in the Applicant's **Policy Compliance Document [APP-032].**
3.7	The Planning (Listed Buildings and Conservation Areas) Act 1990, the National Design Guide 2021, the Town and Country Planning Act 1990 (as amended) and the Environment Act 2021 are also relevant where applicable.	This is agreed by the Applicant in respect of the National Design Guide 2021 and the Environment Act 2021. However, in relation to The Planning (Listed Buildings and Conservation Areas) Act 1990 and the Town and Country Planning Act 1990, where a nationally significant infrastructure project is proposed, thus requiring development consent in accordance with Section 31 of the Planning Act 2008, and other consents that would otherwise be required are not needed. Of particular importance is that it is

Para Ref.	HDC Comments	Applicant Response
		not necessary to obtain planning permission for the relevant act of development under the Town and Country Planning Act 1990. The consents that are not relevant where development consent is required are specified in Section 33 of the Planning Act 2008 and include consents under the Planning (Listed Buildings and Conservation Areas) Act 1990.
3.8	Emerging Local Plan 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.	This is noted by the Applicant.
3.9	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.	
3.10	The latest updates on the Draft Local Plan to 2046 are on HDC's website.	
3.11	Other Local documents/policy Huntingdonshire District Council Corporate Plan 2023 – 2028	Please refer to the Applicant's response to paragraph 3.13 of BBC's LIR.
3.12	HDC's Climate Strategy and Action Plan (2023)	

Para Ref.	HDC Comments	Applicant Response
3.13	Huntingdonshire Futures Place Strategy (March 2023)	
3.14	Huntingdonshire Economic Growth Strategy (2025 – 2030)	
5.1	PLANNING HISTORY HDC is satisfied that the relevant planning history within the Order Limits is appropriately set out in Appendix A: Relevant Planning History of the Planning Statement [APP-031]. In addition, the Council has identified further recent applications of relevance, as well as updates to the progress of applications already listed. All applications are publicly available on Public Access using the reference number.	Please refer to the Applicant's response to paragraph 3.4 of BBC's LIR which addresses the matter of further planning applications in the area and their consideration in an updated long list for the purpose of carrying out the cumulative impacts assessment.
5.2	The following application is included in the Applicant's list, but its status has since been updated: - 25/00891/FUL – Land At Eastern Edge Of Little Staughton Solar Farm, Little Staughton Airfield, Little Staughton – Change of use to operational land, extension to existing substation alongside fencing and associated works – Permission Granted 26.09.2025 -	
5.3	The following applications are not included in the Applicant's list but are considered relevant to the Scheme: - 25/80286/COND – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Discharge of conditions 11 (Traffic Management Plan), 20 (PROW Protective Measures), 24 (Soil Management) and 27 (Skylark Mitigation) of permission 22/01813/FUL – Approved 22.12.2025 - 25/02081/S73 – The Orchard, Garden Farm, The Town, Great Staughton, St Neots, PE19 5BE - Variation of	

Para Ref.	HDC Comments	Applicant Response
	Condition 1 (Approved plans) for 24/02336/S73 relating to Condition 2 for permission 17/00764/FUL S73 approval – Approved 28.01.2026 - 24/02336/S73 – The Orchard, Garden Farm, The Town, Great Staughton, St Neots, PE19 5BE – Variation of Condition 2 (Approved plans) and Condition 9 (Hours of deliveries or dispatches) for 17/00764/FUL – Approved 25.02.2025 - 26/00313/S73 – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Variation of condition 2 (approved plans) of 22/01813/FUL (Installation of solar farm (generating up to 50MW) comprising the provision of photovoltaic panels, inverters, switchgear housings and transformer stations together with hardstanding, landscaping, access alterations, fencing and associated works) – Pending Consideration - 26/80081/COND – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Discharge of condition 13 (WSI) of 22/01813/FUL (installation of solar farm comprising the provision of photovoltaic panels, inverters, switchgear housings and transformer stations together with hardstanding, landscaping, access alterations, fencing and associated works) – Pending Consideration - 26/80043/COND – Land East And West Of Little Staughton Solar Farm, Kimbolton Road, Hail Weston – Discharge of Conditions 5 - Final Details, 14 - AMP, 15 - Soft Landscaping Scheme, 17 - PRoW Plans, 19 - Permissive Path, 21- Trees, 22- Arb Method Statement, 23- Drainage, 25 - CEMP, 26 - LEMP of permission 22/01813/FUL – Pending Consideration -	

Para Ref.	HDC Comments	Applicant Response
6.3	Principle of development This section is concerned with the broad principle of development for a renewable or low carbon energy generating scheme in the countryside. More detailed, site specific matters are considered elsewhere in the report.	The Applicant welcomes the Councils assessment regarding the land use principle of the Scheme in the context of the relevant Local Plan policy and guidance. They also agree with the Councils conclusions in terms of the Scheme attracting limited negative weight in terms of its in-principal acceptability in this location. However, whilst it is touched upon in the Council's analysis, it must be emphasised that this is an application for a nationally significant infrastructure project for which decision making is principally made in relation to a different policy context, namely in substantial accordance with the relevant National Policy Statements (NPS). In this context the Overarching National Policy Statement for Energy (EN-1) establishes the overall need for new energy infrastructure and explicitly explains the "*urgent need for significant amounts of large-scale energy infrastructure*" to meet government objectives (including decarbonisation and security of supply) The National Policy Statement for Renewable Energy Infrastructure (EN-3) provides detailed policy specifically for renewable energy projects). It also explicitly includes solar and confirms its important role in energy security and net-zero delivery, strengthening the presumption in favour of such development. It also sets out the main policy requirements applicants for nationally significant solar development should take into consideration. The principle of development for a nationally significant solar project (like the Scheme) is that it is presumed necessary to meet the UK's energy security and net-zero commitments, and the DCO decision must be made in accordance with the Energy NPS's unless strong contrary evidence exists.
6.4	The Council accepts that there is a compelling need, as a matter of principle, to increase renewable energy generation and consumption to support the Government's national agenda to reach net zero carbon by 2050.	
6.5	The application site is located outside a built-up area and is therefore considered to be within the countryside for planning purposes wherein Policy LP10 of Huntingdonshire's Local Plan to 2036 applies. Policy LP10 restricts development in the countryside to the limited and specific opportunities as provided for in other policies of the Local Plan. The supporting text Policy LP10 notes that this is in order to balance support for a thriving rural economy and land-based business, while protecting the character and beauty of the countryside.	
6.6	Of particular relevance in this instance is Policy LP35 which states that "a proposal for a renewable or low carbon energy generating scheme, other than wind energy, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable".	
6.7	As set out in paragraph 8.52 of the Local Plan, these impacts will include, but are not limited to: - any on the surrounding environment - amenity, and in particular impacts from noise and air quality - heritage assets and/ or their settings - biodiversity - landscape	

Para Ref.	HDC Comments	Applicant Response
6.8	As stated above, Policy LP35 provides support in principle for renewable and low carbon energy generation and is therefore considered to be one of the specific opportunities for development in the countryside supported in the Local Plan, subject to a detailed assessment of the proposed development and its impacts. In terms of the countryside location, and notwithstanding further assessment in respect of the use of agricultural land, it is considered there is in-principle policy support for the development in this location.	
6.9	Policy LP10 states*: "All development in the countryside must: a. seek to use land of lower agricultural value in preference to land of higher agricultural value: i. avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and ii. avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land; b. recognise the intrinsic character and beauty of the countryside; and c. not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others."*	
6.10	The supporting text for Policy LP10 at paragraph 4.112 of the Local Plan states: *"Agricultural land is a valuable asset in itself as it contributes to the local and national economy and assists with food security. Huntingdonshire's agricultural land is almost entirely of good quality: 98% is classed as grades 1, 2 or 3. 15% is grade 1 (excellent quality) which is concentrated in the north east of the district, mainly in the Fens with a few pockets along the Ouse Valley. A proposal involving built development on agricultural land should demonstrate that it is located on the lowest grade agricultural land suitable and available within the vicinity which is also compatible with other sustainability objectives. Development should avoid use of grade one agricultural land."*	

Para Ref.	HDC Comments	Applicant Response
6.11	The Applicant has carried out an Agricultural Land Classification and Soil Resources survey ES Vol 2 Appendix 13-1: Agricultural Land Classification and Soil Resources [APP-115] which has informed the assessment of likely significant effects within ES Vol 1 Chapter 13: Land and Soils [APP-150]. The survey area extended to 738.8ha in total, comprising four main panel areas and a cable route (paragraph 2.1 of APP-115).	
6.12	The ALC survey states that the Site comprises a mix of Grade 2 (very good), Grade 3a (good) and Grade 3b (moderate) agricultural land: - Grade 2 – 163.6. ha (22%); - Grade 3a – 354.4 ha (48%); - Grade 3b – 185.2 ha (25%); - Non-agricultural – 35.6 ha (5%) - Non surveyed – 41.6 ha	
6.13	Land described as 'not surveyed' comprised 22.4 ha of land between Areas A and B proposed for Landscaping and Green Infrastructure where no disturbance of the soil resource would occur (within BBC boundary); 5.7 ha of cable corridor between Areas C and D with no survey access (within HDC boundary); and 13.5 ha of land with no survey access around the existing substation (within BBC boundary).	
6.14	The proposed development does not involve the use of Grade 1 agricultural land. However, 518ha (74%) of the site constitutes BMV land (Grades 2 and 3a). Policy LP10 seeks to avoid the irreversible loss of such land where possible and encourages the use of lower-grade land in preference to higher-grade land.	
6.15	While the majority of the BMV land would be capable of reinstatement following the 40-year operational period, certain components of the scheme—including the BESS compound, substation, access tracks, and new woodland and hedgerow	

Para Ref.	HDC Comments	Applicant Response
	planting—would result in localised, permanent loss of agricultural land. It is in respect of these permanent elements that a degree of conflict with Policy LP10 arises.	
6.16	There is no broader conflict with LP10 in principle, as the temporary use of BMV land does not constitute irreversible loss and can be appropriately managed through mitigation and restoration measures secured via the Outline Soil Management Plan [APP-161] in the draft DCO [PDA-005].	
6.17	The Great Staughton Neighbourhood Plan includes Policy GSNP13, which supports community-led renewable energy projects. As the proposed development is not community-led, this policy is not considered relevant to the assessment of this scheme.	
6.18	Overall, the proposed development attracts limited negative weight in respect of the principle of development, specifically relating to the permanent loss of BMV land associated with certain elements of the scheme, as outlined above. Detailed impacts are assessed further in the topic-specific sections of this report.	
6.19	<u>Landscape and Visual Impact</u> It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. The assessment of landscape and visual impacts has been carried out on a combined basis across the full study area and does not, for example, distinguish visual receptors by administrative boundary. As a result, some receptors and conclusions reported here may fall outside Huntingdonshire's administrative boundary but are included for completeness. Accordingly, elements of this assessment may also appear within the LIRs submitted by the other Host Authorities.	This is noted by the Applicant.

Para Ref.	HDC Comments	Applicant Response
6.20	Relevant Development Plan policy: Policy LP10b. of Huntingdonshire's Local Plan to 2036 states that development in the countryside must recognise the intrinsic character and beauty of the countryside.	The Applicant agrees that these are relevant Local Plan policies.
6.21	Policy LP35 of Huntingdonshire's Local Plan to 2036 supports proposals for renewable energy where all potential adverse impacts, including cumulative impacts, are or can be made acceptable. When identifying and considering landscape and visual impacts regard should be had to the Huntingdonshire Landscape and Townscape Assessment SPD (2022). Pages 98 – 103 of the aforementioned document covers the Southern Wolds Landscape Character Area which is most relevant to the assessment of the Scheme.	
6.22	Policy GSNP7 of the Great Staughton Neighbourhood Plan (2021 to 2036) requires as appropriate to their scale, nature and location, development proposals must recognise, maintain and where possible enhance the existing landscape and settlement character in Great Staughton parish as set out in the Great Staughton Landscape and Townscape Assessment 2023.	
6.23	Summary: Landscape and Landscape Visual Impact Assessment matters are considered within Chapter 5 of the ES [APP-041] and supporting figures and appendices. The Scheme has the potential to transform the local landscape by altering the character and by virtue of the scale of the proposals; there will be significant residual landscape character and visual impacts that cannot be mitigated. Effects will primarily be derived from the introduction of construction (albeit temporary and reversible) and solar PV panels over a large area, rather than by modification of landform, field patterns or loss of characteristic elements such as hedgerows or woodland, which will be retained. The main landscape receptor within Huntingdonshire is the Southern Wolds Landscape Character Area (LCA). Significant	The Applicant notes this comment.

Para Ref.	HDC Comments	Applicant Response
	effects are assessed for the Southern Wolds LCA in construction but not operation. The assessment concludes that no significant landscape effects will occur for Year 10 or beyond.	
6.24	The Scheme has been identified in the LVIA as resulting in a significant change to a variety of visual receptors, with significant residual visual effects identified for residential locations at Year 1 (reducing to non-significant by Year 10) and from PRoW in the immediate vicinity of the solar panels and more distant open and elevated views from higher land (some remaining significant at Year 10). There will be sequential changes in views and adverse visual impacts for users of PROWs. This includes the different users of the network, such as equestrians and cyclists as well as walkers. No significant visual effects have been identified on residential receptors located directly within the villages located within the study area.	Please refer to the Applicant's response to paragraph 6.10 of BBC's LIR.
6.25	Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the landscape 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.	Please refer to the Applicant's response to paragraph 6.11 of BBC's LIR.
6.26	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 Council considers that a more appropriate agriculturally based management regime of lower hedgerows (1.5m) should be implemented on a rotational basis post operation.	Please refer to the Applicant's response to paragraph 6.12 of BBC's LIR.

Para Ref.	HDC Comments	Applicant Response
6.27	Construction Phase Impacts: Positive No positive landscape or visual impacts arising from construction of the Scheme have been identified, reflecting that construction is largely disruptive in a rural context and may involve removal of landscape elements (hedgerows) and/or introduction of machinery/vehicles and activity in a concentration which is incongruous in a rural context and impacts landscape character and visual amenity.	Please refer to the Applicant's response to 'matter 10' of BBC's LIR which addresses the same points from the response AECOM has prepared on behalf of the Host Authorities.
6.28	Neutral No neutral landscape impacts arising from construction of the Scheme have been identified.	
6.29	Table 2.1 of ES Appendix 5-5: Effects on Visual Receptors provides the assessment of visual effects on residents assessed within the study area, with reference to relevant viewpoint assessments. In construction, there would be no change / a neutral effect on visual amenity for the views of residents at: R1 – Swineshead Village; R3 - Coldham Lodge Farm; R6 - Green End; and R37 - Field Farm. In construction, there would be no change in views of people using community facilities C1-C4 and C6-C8, with a minor change for users of C5 - Church of All Saints at Little Staughton.	
6.30	Negative In construction, moderate to major adverse (significant) effects on landscape character are identified for the Southern Wolds LCA.	

Para Ref.	HDC Comments	Applicant Response
6.31	Construction impacts on landscape character would occur over a 30-month period and arise from: construction of solar arrays within largely arable fields; excavations associated with the underground cable connections; construction of new access roads; erection of temporary construction fencing and permanent boundary fencing and temporary lighting required primarily in winter months (not overnight). During construction there would also be some very localized clearance of existing hedgerow.	
6.32	Overall, the construction operations would be highly visible within the Southern Wolds LCA and would give rise to a localized, but significant, change to landscape character for the 30-month duration of the construction works.	
6.33	Table 2.1 of ES Appendix 5-5: Effects on Visual Receptors provides the assessment of visual effects on residents assessed within the study area, with reference to relevant viewpoint assessments.	
6.34	In construction, moderate to major adverse (significant) effects on the visual amenity of residents would occur at: R9 – Properties on Great Staughton Road, east of Green End; R10 - Hoo Farm; R12 – Row of properties off the B660; R17 – Northern side of the southern extent of Green End; R19 - Lodge Farm; R20 - Rectory Farm; R21 – Home Close and Little Hollow Cottage; R22 - The Kangaroo; R23 – New Farm; R25 – Garden Farm and Garden Cottage; and at R31 - Pastures Farm.	
6.35	Table 2.2 of ES Appendix 5-5: Effects on Visual Receptors summarises the assessment of visual effects on people using the public rights of way assessed within the study area. The number of PRoWs adjacent to or within the solar arrays reflects the degree to which recreational users of them would be impacted in construction.	

Para Ref.	HDC Comments	Applicant Response
6.36	In construction, major adverse (Significant) effects on the visual amenity of recreational users of PRoW would occur at: Footpaths 34 and 35 and Bridleway 37 and 40; Footpaths 4, 8, 13, 26, 47; Footpaths 5 (Little Staughton parish) and 213/1; Footpaths 112/5, 112/6, Bridleway 112/7 and 112/8; and Footpaths in the vicinity of Little Staughton / Green End.	
6.37	Moderate to major adverse effects on the visual amenity of recreational users of PRoW would occur at: Footpaths A3, 2, 32, 11 and 12; Footpaths 1, 5, 19; and Footpaths 213/3 and 213/28.	
6.38	For people in vehicles on local roads impacts would be non-significant, reflecting lower sensitivity and duration of likely views. Similarly, effects on employment sites E1-E3 would be non-significant.	
6.39	Mitigation required Mitigation, typically consisting of additional tree and hedgerow planting located on the boundaries of the site, as set out in Tables 2.1-2.4 within ES Appendix 5-5: Effects on Visual Receptors will be immature or absent during construction.	
6.40	The Council considers that consideration should be given to advanced planting of mitigation, where this does not conflict with construction activity, so that there is a greater degree of maturity in Year 1 of operation.	
6.41	Mitigation of landscape and visual effects in construction will be in accordance with 7.3 Outline Construction Environmental Management Plan P01 [APP-155] and a7.4 Outline Construction Traffic Management Plan P01 [APP-156].	

Para Ref.	HDC Comments	Applicant Response
6.42	Operational Phase Impacts: Positive No positive landscape or visual impacts arising from operation of the Scheme have been identified, reflecting that the significant operational impacts on landscape character and visual amenity would occur through alteration of some of the key characteristics of the Southern Wolds LCA within which the main development will be located.	
6.43	Neutral There would be a neutral effect on LCA 4A Great Ouse Clay Valley in operation and for various viewpoint locations and receptor groups: VP4 Church of St Nicholas in Swineshead; VP22 Church of St Peter in Pertenhall; VP29 Church of St Mary the Virgin in Keysoe; 79 Junction between B645 and High Street at Hail Weston; VP80 Duloe Road VP81 Footpath 23 (Parish of Staploe); and VP82 Footpath 8A (Parish of Staploe) at the Eaton Socon Substation.	
6.44	Negative All residential receptors identified as experiencing significant visual effects during the operational phase are either individual properties, or small groups of properties, located close to the Order Limits.	
6.45	No significant visual effects have been identified on residential receptors located directly within the villages located within the study area.	
6.46	The residential receptors that would be subject to a significant visual effect at Year 0 during operation are as follows: R9 Properties on Great Staughton Road, east of Green End; R10 Hoo Farm; R12 Row of properties off the B660; R23 New Farm and R25 Garden Farm and Garden Cottage.	

Para Ref.	HDC Comments	Applicant Response
6.47	The establishment of tree and shrub planting mitigation, primarily as hedgerows, would reduce the level of effect at residential locations, such that the residual effect at Year 10 is Not Significant.	
6.48	The multiple effects on rights of way identified as being subject to significant visual effects during Year 0 of operation reflect the dense network of PROW within the study area which provides connections between farms and small settlements. Significant visual effects in Year 0 of operation therefore typically relate to relatively short distance footpaths which form part of a network of PROW in and around fields and small settlements within the Site.	
6.49	Some significant visual effects on users of rights of way would remain at Year 10, particularly from rights of way directly adjacent to the Site. There would be a residual change to the level of openness in views and as such the significant visual effects would remain.	
6.50	The following are PROW receptors which have been identified as experiencing a significant visual effect at Year 10: Bridleway 37 and 40 and Footpaths 34 and 35, which are located directly within the southern extent of Site A; Footpaths 4, 8, 13, 26, 47, which are located directly within Site B; Footpath 5 and 20 are located on PROW situated on slightly elevated ground, close to Pertenhall, at least 1km north of Sites A and B and the residually significant effect on each of these rights of way is due to the extent of the solar array which would be evident in a single view due to Sites A and B; Footpaths 5 and 213/1 are located on PROW situated on slightly elevated ground, close to Little Staughton, within 1km south of Site B and the residually significant effect on each of these rights of way is due to the extent of the solar array which would be evident in a single view due to Site B.	

Para Ref.	HDC Comments	Applicant Response
6.51	No community receptors have been identified as experiencing a significant visual effect during the operation of the Scheme. Similarly, no road receptors or people at employment sites have been identified as experiencing a significant visual effect during the operation of the Scheme.	
6.52	Mitigation required Figure 2-1: Illustrative Environmental Masterplan [APP-121] shows the proposed landscape and visual mitigation for the Scheme. The landscape proposals are tailored to the location and required functions of each part of the Scheme, noting that these change across the Site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where possible, especially for visual receptors, at the edges of settlements and along routes and PROW connecting settlements.	
6.53	Mitigation, typically consisting of additional tree and hedgerow planting located on the boundaries of the site, has been used to further screen the solar array within the Scheme, as set out in Tables 2.1-2.4 within ES Appendix 5-5: Effects on Visual Receptors [APP-073].	
6.54	At Year 10, the mitigation proposed, is assumed to have established to a reasonable level of maturity such that the Scheme would be more suitably integrated into the view from most visual receptors, including from residential properties and for PROW users, the two main groups of people impacted by the Scheme.	
6.55	The outline Landscape and Ecological Management Plan (LEMP) [REP1-040] states that hedgerows will be managed at a height of 3 metres, to screen the development and provide ecological benefits. The Council accepts that this is a reasonable mitigation strategy in operation but consider that post decommissioning the presence of tall hedgerows in this context would in itself be a change in	

Para Ref.	HDC Comments	Applicant Response
	landscape character and consider that the post decommissioning height of hedgerows forming field boundaries should be reduced to 1.5 metre height over a phased 3 year rotational cut, in order to more closely match the baseline landscape of the Southern Wolds LCA.	
6.56	Decommissioning Phase Impacts: Positive At the end of decommissioning there would likely be a residual minor beneficial effect on landscape character of the Southern Wolds LCA as there would be enhanced field structure within the Site due to the mature hedgerow and tree cover left by the Scheme.	
6.57	The Council considers that this would be dependent on delivery of a review and phased implementation of modification of hedgerow heights from the 3-metre height necessary in operation to a managed height of 1.5 metres, more typical for the agricultural context. Managed reduction of hedgerow heights should commence during decommissioning and continue on a rotational basis over a 3 year period, to provide nesting continuity for birds.	
6.58	Neutral As described for construction.	
6.59	Negative Decommissioning effects in relation to landscape character and visual amenity would largely mirror those in construction but with a reduced magnitude due to enhanced screening delivered by the mitigation scheme. There would be temporary adverse effects during the removal of the Scheme which would be similar to those reported during construction, i.e. that there would be Moderate to Major Adverse levels of effect on the Southern Wolds LCA.	

Para Ref.	HDC Comments	Applicant Response
6.60	Mitigation required As set out in 6.53 and 6.56 a permanent change in hedgerow heights to 3 metres is considered contrary to the baseline rural context and hence a negative effect, that can be mitigated by post operational rotational reduction in hedgerow heights.	
6.61	Ecology and Nature Conservation It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.	The Applicant notes this point.
6.62	Relevant Development Plan policy: Policy LP30 of Huntingdonshire's Local Plan to 2036 sets out how the Council will consider proposals in relation to biodiversity and geodiversity, including how a proposal will be required to demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated.	The Applicant agrees with the Council's assessment of relevant local plan policy.
6.63	Policy GSNP11 of the Great Staughton Neighbourhood Plan (2021 – 2036) requires any development affecting sites of ecological importance, including locally valued sites (identified on map 9A, 9B, 9C and 9D) to follow the mitigation hierarchy: avoid impacts first, mitigate where unavoidable, and compensate only as a last resort.	
6.64	The policy identifies specific sites of biodiversity importance to the village, including A2 and A4 (Map 9A), the River Kym (Map 9B), and sites C1, C2 and C3 (Map 9C). As the order limits lie south of A2, A4, the River Kym and close to C1–C3, development must identify direct or indirect adverse impact on their ecological	

Para Ref.	HDC Comments	Applicant Response
	importance (either individually or in combination with other developments), or the ecological connectivity between them.	
6.65	Summary: Ecology and Nature Conservation matters are considered within Chapter 7 of the ES [APP-043] and accompanying appendices [APP-091 to APP-097]. These are supported by the Ecology and Nature Conservation Figures [APP-145] and the Ecology and Nature Conservation Figures – Confidential [APP-146].	Noted
6.66	The Construction Phase of the Scheme is expected to result in significant negative impacts on ecological features, including habitat loss and disturbance. Permanent habitat loss will occur due to construction activities during the 30 month construction period. These activities will also result in the potential for disturbance of species associated with these species through noise, dust, lighting, and visual intrusion.	Noted, this is consistent with the Applicant's own assessment of construction phase impacts on ecological features.
6.67	The Scheme will involve works adjacent to / in proximity to three non-statutory sites designated as County Wildlife Sites (CWS) namely Huntingdon Wood CWS (within HDC's administrative boundary); High Wood CWS (within HDC's administrative boundary); and Kangaroo Meadows CWS (within BBC's administrative boundary). There is currently insufficient information to confirm that these sites will not be subject to hydrological impacts and that access will be maintained to ensure traditional management practices like coppicing are not impacted.	The Applicant has already addressed this matter in their response to paragraph 9.7 of BBC's LIR.
6.68	The Council has raised concerns regarding the adequacy of surveys for protected species, including ground-nesting birds, bats, hazel dormouse, water vole, and otter, which could lead to underestimating impacts. Clarifications are required from the	The Applicant has already addressed this matter in their response to paragraph 9.27 of BBC's LIR.

Para Ref.	HDC Comments	Applicant Response
	Applicant in order to ensure that the assessment is robust and associated mitigation proposals are appropriate.	
6.69	The Council has emphasized the need for a detailed farmland bird mitigation strategy, sensitive lighting measures, and expanded buffer zones for hedgerows and trees to mitigate potential ecological impacts. These measures need to be secured through the DCO process including incorporation into the Outline Construction Environmental Management Plan (oCEMP) [APP-155], Outline Landscape and Ecology Management Plan (oLEMP) [REP1-040], DCO commitments register [APP-154] or other submission documents as appropriate.	The Applicant has already addressed this matter in their response to paragraph 9.28 of BBC's LIR.
6.70	During the Operational Phase, the Scheme is expected to deliver significant ecological benefits through the creation of diverse habitats, including native woodland, hedgerows, grazed pasture, and species-rich grasslands. However, concerns remain regarding the F, such as skylark and lapwing, due to disturbance during operation. Additionally, shading impacts from mitigation woodland planting on Kangaroo Meadows CWS (within BBC's administrative boundary) require further clarification.	The Applicant has already addressed this matter in their response to paragraph 9.29 of BBC's LIR.
6.71	The Council stresses the need for securing a holistic biodiversity monitoring plan to complement the Biodiversity Net Gain (BNG) targets. In addition, HDC requests that clear commitments are provided to demonstrate how habitat management and maintenance will be secured throughout the 40 year operational, in order to ensure the predicted positive effects during the operational phase are achieved.	The Applicant has already addressed this matter in their response to paragraph 9.30 of BBC's LIR.
6.72	The decommissioning phase raises significant concerns regarding the long-term survival and management of habitats created under the Scheme. Once the physical infrastructure is removed, these	The Applicant has already addressed this matter in their response to paragraph 9.31 of BBC's LIR.

Para Ref.	HDC Comments	Applicant Response
	habitats will be returned to landowners, potentially leading to a lack of ongoing management or even removal. The Council emphasizes the necessity of securing commitments for the long-term retention and management of retained habitats to ensure that the ecological benefits identified during the operational phase are preserved and sustained beyond the Scheme's lifespan.	
6.73	Construction Phase Impacts: Positive No positive impacts or associated effects upon features of ecology and nature conservation importance are expected to arise from the construction of the Scheme. The Construction Phase will result in the loss of habitats including areas of existing grassland and hedgerows. In addition, the use of construction machinery and other construction activities have the potential to result in disturbance of retained ecological features (including through noise; visual; lighting and dust).	The Applicant noted this point
6.74	Neutral The Scheme is not expected to result in any impact (or associated effect) upon the bird populations for which the Grafham Water Site of Special Scientific Interest (SSSI) is designated. Surveys identified a bird assemblage typical of lowland agricultural habitat with only low and irregular use by common waterbirds. Therefore, the effect on Grafham Water SSSI is expected to be Neutral.	The Applicant agrees with this point.
6.75	No losses of ancient woodland or veteran trees will occur as a result of the Scheme. All such trees will be retained with appropriate buffers.	The Applicant agrees with this point.
6.76	Three watercourse crossings will utilise horizontal directional drilling thus avoiding impacts on the watercourse.	The Applicant agrees with this point.

Para Ref.	HDC Comments	Applicant Response
6.77	Assuming that standard construction controls are implemented, such as implementation of the Outline Construction Environmental Management Plan (oCEMP) [APP-155] then it is expected that impacts of the Scheme on several ecological features including reptiles and foraging/ commuting bats will be avoided or reduced to a level that they are considered Neutral.	The Applicant agrees with this point.
6.78	Negative During the Construction Phase the Scheme will result in negative effects on ecological features of importance for ecology and nature conservation. This will include habitat loss due to the construction of the solar arrays, associated access roads and excavations associated with underground cable connections. In addition to permanent impacts there will be some temporary negative impacts (and associated effects) during the 30-month construction period including temporary habitat loss (e.g. for compounds and fencing) as well as potential disturbance (lighting, dust noise and visual) of habitats and species.	The Applicant notes this point
6.79	Designated Sites The Scheme will involve works adjacent to / in proximity to three non-statutory sites: - Huntingdon Wood County Wildlife Site (CWS) within HDC's administrative boundary (designated for its ancient woodland, an irreplaceable resource); - High Wood County Wildlife Site (CWS) within HDC's administrative boundary designated for its ancient woodland, an irreplaceable resource, and the support it provides to diverse invertebrate and amphibian populations; and - Kangaroo Meadows CWS within BBC's administrative boundary designated for neutral grassland communities. -	These matters are addressed in the Applicant's response to paragraph 2.3.9 of CCC's LIR above.

Para Ref.	HDC Comments	Applicant Response
6.80	While no direct loss of habitat within these sites is expected, the Council is concerned that there is currently insufficient information to verify the Applicant's conclusion that these sites will not be adversely impacted during construction.	
6.81	Further information is required to assess the potential for hydrological impacts through trenching in close proximity to Huntingdon Wood CWS and potential impacts of the use of an existing culvert for construction access. Regarding High Wood further information is required to demonstrate that traditional practices (such as coppicing) undertaken to maintain the high wildlife value of the CWS will not be adversely impacted upon during construction.	
6.82	Habitats The Scheme will result in the removal of a total of 84 metres of hedgerow, a Habitat of Principal Importance under the Natural Environment and Rural Communities Act (2006, as amended), with 42 metres of this directly reinstated following the completion of construction works.	The Applicant agrees with these points.
6.83	The Scheme requires a total of 22 new watercourse crossings and one upgraded watercourse crossing and these will result in small scale habitat loss and or disturbance	
6.84	Remaining habitats removed in order to construct the Scheme consists of lower importance habitat such as arable habitat, grassland field margins and areas of scrub.	
6.85	Protected and/or Notable Species – The Council 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	Theis matter is addressed in the Applicant's response to paragraph 9.12 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
	shortfalls in data have been considered and their impact on the final assessment conclusions; this concern is set out below.	
6.86	Ground nesting birds – The Council is 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 Vol 1 Chapter 7 [APP-043] sets out at para 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 [REP1-040] currently provides insufficient detail to demonstrate that the proposed measures will be sufficient.	This matter is addressed in the Applicant's response to paragraph 9.29 of BBC's LIR above.
6.87	These details are required to assess the appropriateness of the measures proposed and determine if further off-site compensation is required. The Applicant is referred to the RSPB 'Farming for Wildlife: Skylark Plots' (nd) regarding accepted guidance of size of area to be set aside.	
6.88	Roosting bats and trees – The Council is 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 para7.7.20 of the ES Vol 1 Chapter 7 [APP-043] that 'trees present within the Site would be retained and protected during construction', however the Council 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 oCEMP [APP-155] or oLEMP [REP1-040], that suitable protection buffers can be incorporated into the design for all relevant trees. The minimum 6 metre hedgerow buffer outlined in the ES would be insufficient to prevent disturbance where roosts are confirmed or have the potential to be present.	This matter is addressed in the Applicant's response to paragraph 2.3.13 of CCC's LIR above.

Para Ref.	HDC Comments	Applicant Response
6.89	Hazel dormouse – The Council note that while the presence of hazel dormouse is unlikely, in the absence of a 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).	This matter is addressed in the Applicant's response to paragraph 9.11 of BBC's LIR above.
6.90	Water vole and otter – 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 Council 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. However, the Council is content that the proposed pre-construction checks detailed in Section 5 of the oLEMP [REP1-040] alongside the commitment to positive management of retained ditches provided in para6.4.8 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.	This matter is addressed in the Applicant's response to paragraph 9.12 of BBC's LIR above.
6.91	Great crested newt – It is noted that the 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.	This matter is addressed in the Applicant's response to paragraph 9.13 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
6.92	Mitigation required Farmland Bird Mitigation Strategy 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): - details of proposed habitat losses and gains (overall area and territory numbers); - 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.	Theis matter is addressed in the Applicant's response to paragraph 9.29 of BBC's LIR above.
6.93	Cross reference on commitments The Council welcome the proposed biodiversity mitigation / compensation set out in ES Vol 1 Chapter 7 [APP-043], however, some have not been adequately incorporated into other submission documents (e.g. environmental masterplan, engineering drawing, management plans, DCO commitments, etc.) and therefore, delivery cannot be assumed; by example: a) References to incorporation of sensitive lighting design need to be better reflected in the content of the oLEMP [REP1-040] and oCEMP [APP-155] to ensure adverse effects on adjoining habitats such as Huntingdon Wood CWS, High Wood CWS, and other ancient woodland are avoided. [APP-031] Planning Statement para4.7.19 (cross-referenced with [APP-038], para2.5.24 - 2.5.27 and [APP-	This matter is addressed in the Applicant's response to paragraph 9.14 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
	155] para4.1.26 – 4.1.29): the Applicant's approach that appropriate artificial lighting will be controlled / managed (in part) to ensure that impacts on ecological receptors, nearby residents and amenity users of the Site are minimised is welcomed. i. Attention is drawn to NPS EN-3 (para2.10.46 to 2.10.48) which states that lighting relating to security measures should be fully assessed by the Applicant. ii. It is recommended that the submission of and approval of specific lighting measures form a requirement within the DCO's Schedule of Requirements. b) Similarly, the Council welcome the inclusion of the expected biodiversity net gain metric outputs as commitment C12 of the Commitments Register [APP 154]. However, the Council are concerned that these commitments are not currently reflected in the oLEMP [REP1-040], and currently the calculation undertaken is high-level only. The Council requests that commitments are clearly stated in the oLEMP to ensure clarity on targets post construction. c) The Council notes that the final biodiversity net gain outcomes will be dependent on created habitats being maintained and suitably managed. Given the temporary nature of the Scheme, and that ongoing management of created habitats after decommissioning are not currently secured, the Council consider the current BNG calculation outputs (and linked beneficial effects) may therefore overstate the likely final scheme outcome. i. It is suggested that this needs comprehensive review, including how these commitments are then secured in the DCO Agreement.	

Para Ref.	HDC Comments	Applicant Response
6.94	Planting selection The proposed woodland planting and that plants of local provenance are to be utilised is welcomed. The Council requests that the final woodland, hedgerow, and river course planting stock list (species list) should be discussed with the local planning authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease). Further, an understory of grasses, wildflower meadows, and bulb species add to habitat diversity and ecological resistance would be encouraged.	This matter is addressed in the Applicant's response to paragraph 9.15 of BBC's LIR above.
6.95	Landscape widths The Council note that the minimum six metre buffer between the fenceline of the solar farm and the surround hedgerows specified in [REP1-040] oLEMP Section 3.4.1 is low, in particular for hedgerows containing standard trees. The Council would wish to see 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.	This matter is addressed in the Applicant's response to paragraph 9.17 of BBC's LIR above.
6.96	Grassland establishment The Council have concerns regarding the method identified for establishment of diverse grassland in the areas identified within the illustrative Environmental Masterplan [APP-121] and the oLEMP [REP1-040]. 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 conflict with the proposed use of the same areas to provide habitat for ground nesting birds.	This matter is addressed in the Applicant's response to paragraph 9.18 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
6.97	Veteran trees The embedded mitigation measures for veteran trees and trees with veteran features outlines in the oCEMP [APP-155] are welcomed. The Council request that for consistency, reference to these measures is also referenced within the oLEMP [REP1-040].	This matter is addressed in the Applicant's response to paragraph 9.19 of BBC's LIR above.
6.98	Operational Phase Impacts: Positive The Scheme would result in the creation of significant areas of habitat creation including approximately 19 ha of native species woodland or woodland belt; 17.4km of native species hedgerow; 375 individual native species trees; 448 ha of grazing pasture of neutral grassland and 205 hectares of species diverse grassland. The establishment and ongoing maintenance of these habitats during the operational phase is expected to result in a significant positive effect on habitats during the 40-year operational. In addition, these habitats have the potential to result in positive effects for breeding birds (except ground nesting species), foraging and commuting bats, amphibians and reptiles.	The Applicant agrees with these points. This is also the conclusion of their own assessment.
6.99	Neutral During the operational phase no effects are expected on statutory designated sites for nature conservation or Huntingdon Wood CWS or High Wood CWS which adjoin the Scheme.	The Applicant agrees with these points.
6.100	During operation the impact (and corresponding effects) on otter and water vole populations utilising watercourses within and adjacent to the Scheme are expected to be Neutral.	The Applicant agrees with this conclusion.

Para Ref.	HDC Comments	Applicant Response
6.101	Negative 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.	This matter is addressed in the Applicant's response to paragraph 9.7 of BBC's LIR above.
6.102	The presence of an operational array of solar panels is expected to result in ongoing disturbance that will result in displacement of ground nesting bird species including skylark and lapwing. This is expected to result in negative effects on ground nesting birds. The extent to which this impact will be offset by the proposed additional details relating to required farmland mitigation measures highlighted in relation to impacts arising during the Construction Phase. With implementation of an appropriate mitigation strategy this potential negative effect during operation could be reduced to a level where it is not significant.	This matter is addressed in the Applicant's response to paragraph 9.29 of BBC's LIR above.
6.103	Mitigation required Farmland Bird Mitigation Strategy The measures proposed in relation to farmland birds within the Construction Phase are also relevant to the Operational Phase.	This matter is addressed in the Applicant's response to paragraph 9.9 of BBC's LIR above.
6.104	Monitoring strategy The frequency of monitoring set out within Section 8.0 of the oLEMP [REP1-040] is welcomed, but the Council 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.	This matter is addressed in the Applicant's response to paragraph 9.20 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
6.105	In terms of monitoring, the Council would seek to ensure that an appropriate fee is secured for the ongoing monitoring of BNG, ecology, and landscape mitigation works, as responsibility for this duty will fall to HDC and the other host authorities. 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.	
6.106	While the delivery of +10% BNG is not currently mandatory for NSIPs, other solar schemes have achieved substantial BNG gains, and monitoring fees are being secured through Section 106 agreements on comparable projects (e.g., Springwell Solar Farm). The monitoring regime described in Section 8 of the oLEMP will require internal resource to review maintenance and monitoring reports annually for the first five years and every fifth year thereafter for a 40-year period, as well as undertaking annual site walkovers and any associated enforcement actions that may arise.	This matter is addressed in the Applicant's response to paragraph 8.7 of BBC's LIR above.
6.107	40-year landscape management The Scheme is identified within ES Vol 1 Chapter 7 [APP-043] as having an 'operational lifespan of up to 40-years'; and (para7.5.29) 'LEMP…landscape mitigation and ecological mitigation…and would also set out how this would be managed by the Applicant over the lifespan of the Scheme'. The Council would like to understand how the Applicant assesses and addresses the management and maintenance of the existing mature and a new maturing landscape habitat over the operational lifespan of the Scheme (circa 40-years). This represents a significant financial and staffing commitment which is currently not evidenced (Ref. Scoping Reports, 2023).	This matter is addressed in the Applicant's response to paragraph 9.32 of BBC's LIR above.
6.108	While the Council is in-principle supportive of the Applicant's [REP1-036] outline Operational Environmental Management Plan, [REP1-040] oLEMP and [APP-161] outline Soil Management Plan (oSMP), these require more detailed resolution, specifically how	

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	they are to be staffed and implemented over the 40-year operational phase.	
6.109	Decommissioning Phase Impacts: Positive No positive impacts or effects on features of ecology and nature conservation importance are expected during the decommissioning phase.	The Applicant notes these points.
1.110	Neutral No neutral impacts or effects on features of ecology and nature conservation are expected during the decommissioning phase.	
6.111	Negative The Council is concerned that there is a lack of information on the long-term survival (i.e. beyond 40 years) of the habitats created as mitigation and compensation. It is the Council's understanding that the powers requested under the DCO will not seek to remove any of the habitats created or established by the Scheme on the Site. However, following decommissioning (i.e. the removal of the physical infrastructure) all habitats would be returned to landowners, and at this point ongoing management may cease or they could potentially be removed subject to the relevant legislative and policy requirements at the time being adhered to.	This matter is addressed in the Applicant's response to paragraph 6.14 of BBC's LIR above.
6.112	The extent to which the long-term retention and ongoing management of these habitats is secured is considered a vital part in substantiating the overall residual effects of the Scheme on ecological features reported in the ES.	
6.113	Mitigation required: The Council seeks agreement from the Applicant that areas of species-diverse grassland to be created under the Scheme will be	

Para Ref.	HDC Comments	Applicant Response
	retained and their long-term management secured to ensure the beneficial effects identified in the ES are permanent.	
6.114	Biodiversity Net Gain It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' LIRs. This content is therefore included within HDC's submission for completeness.	This is noted by the Applicant.
6.115	Relevant Development Plan policy: Policy LP30 (Biodiversity and Geodiversity) of Huntingdonshire's Local Plan to 2036 states a proposal will ensure no net loss in biodiversity and provide a net gain where possible, through the planned retention, enhancement and creation of habitats and wildlife features, appropriate to the scale, type and location of development. Large scale development proposals should provide an audit of losses and gains in biodiversity produced according to a recognised methodology.	It is agreed by the Applicant that these are the relevant policies both have been the subject of assessment in the Applicant's **PCD [APP-032].**
6.116	Policy GSNP 11 of the Great Staughton Neighbourhood Plan (2021 – 2036) states when a biodiversity net gain proposal is being formulated, the following are encouraged: i. The creation of new natural habitats appropriate for important wildlife species. ii. The planting of additional trees and hedgerows. iii. Restoring and enhancing existing biodiversity. iv. Creating new wildlife corridors especially where these will help protect or enhance existing corridors in the parish.	

Para Ref.	HDC Comments	Applicant Response
	v. The restoration or creation of new natural habitats especially where these will help protect or enhance existing habitats.	
6.117	Summary: The Applicant has undertaken a BNG assessment using the Defra Statutory Biodiversity Metric. The baseline is dominated by intensively managed agricultural land, with relatively limited areas of higher value semi-natural habitat.	These matters are all addressed in detail in the Applicant's response to paragraph 9.33-9.38 and 'Matter 37' of BBC's LIR above.
6.118	The Applicant's assessment indicates that the Scheme could deliver BNG of approximately 79.51% for area-based habitats, 36.91% for hedgerows and 5.95% for watercourses. The Council welcomes the intention to deliver biodiversity enhancements through habitat creation and improved land management across the Site.	
6.119	However, the Council notes that the BNG assessment currently represents a high level calculation and that delivery of the predicted biodiversity gains will depend on the successful establishment, management and monitoring of the proposed habitats. In particular, the Council considers that the final biodiversity outcomes will be influenced by the detailed design and implementation of habitat creation measures, including soil preparation and the interaction between proposed habitats and operational infrastructure such as solar arrays.	
6.120	The Council also notes that the spatial information presented within the application documents does not clearly show the relationship between proposed habitat creation areas and the full extent of operational infrastructure across the Site. Greater clarity on the spatial arrangement of solar panels, access tracks and habitat areas would assist in understanding how the predicted biodiversity outcomes will be achieved.	

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6.121	In addition, the Council considers that opportunities may exist to further strengthen the BNG strategy through the enhancement of retained habitats and watercourses where practicable.	
6.122	Finally, the Council notes that the Scheme has an operational lifespan of up to 40 years, after which solar infrastructure would be removed and the future land use determined. The long-term retention and management of habitats created as part of the BNG strategy beyond this period is therefore uncertain, meaning the biodiversity benefits delivered during the operational phase may not represent permanent biodiversity gains.	
6.123	<u>Construction Phase Impacts:</u> Positive The Council notes that the Scheme design incorporates measures intended to minimise impacts on ecological features, including the retention of the majority of existing hedgerows, woodland blocks and watercourses within the Site. The layout of the Scheme has sought to avoid direct impacts on these features where practicable.	These matters are addressed in detail in the Applicant's response to paragraph 'Matter 37' of BBC's LIR above.
6.124	Neutral The Council notes that the BNG assessment does not generate biodiversity units during the construction phase, as habitat creation and enhancement measures would be implemented following completion of construction activities.	
6.125	Negative Construction of the Scheme will result in the loss or conversion of habitats within the development footprint. While much of the baseline habitat comprises low distinctiveness agricultural land, the baseline assessment identifies approximately 42.7 ha of medium distinctiveness habitats, including other neutral grassland and areas of scrub, a proportion of which will be lost.	

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6.126	The BNG assessment also identifies limited removal of existing hedgerow, amounting to approximately 0.07 km of baseline hedgerow loss across the Site.	
6.127	Mitigation required: The Council notes that habitat losses are reflected within the BNG assessment and are proposed to be addressed through habitat creation and enhancement measures to be delivered as part of the Scheme. However, the Council emphasises that the mitigation hierarchy should continue to be applied through the detailed design and construction phases, ensuring that habitat loss is avoided and minimised wherever practicable before reliance is placed on compensatory habitat creation.	
6.128	The Council considers that mitigation during construction should be secured through the final CEMP to be approved prior to construction, including appropriate habitat protection measures and ecological supervision where works occur in proximity to retained habitats.	
6.129	The Council also notes that opportunities may exist to undertake early habitat creation and planting during construction, where practicable. Early implementation of habitat creation measures could support earlier establishment of habitats and reduce the temporal lag between habitat loss and delivery of biodiversity enhancements.	
6.130	The Council notes that the construction programme for the Scheme extends over a period of approximately 30 months, with habitat mitigation and landscaping proposed towards the later stages of construction. The BNG assessment does not apply a delay to the time to target condition for created habitats and therefore assumes that habitat creation occurs immediately following habitat loss. However, the construction programme indicates that the	

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	establishment of replacement habitats would occur during the later stages of the construction period. The Council requests clarification as to how the timing of habitat creation relative to the construction programme is reflected in the BNG assessment.	
6.131	Operational Phase Impacts: Positive During operation, the Applicant proposes the creation of habitats including species-rich grassland, woodland planting and native hedgerow creation. The Council recognises that the conversion of intensively managed agricultural land to habitats managed for biodiversity has the potential to deliver ecological benefits if successfully established and maintained.	
6.132	The Applicant's BNG assessment predicts net gains of approximately 79.51% for area-based habitats, 36.91% for hedgerows and 5.95% for watercourses, arising primarily from the conversion of existing arable land to habitats managed for biodiversity.	
6.133	Neutral Once operational, the Site is expected to experience relatively low levels of activity and will primarily be managed for habitat establishment and ecological enhancement.	
6.134	Negative Operational infrastructure including solar arrays, fencing and access tracks will occupy areas of the Site and limit the extent of habitat creation in those locations. The Applicant's BNG assessment does not include a post-development BNG f igure showing the location of operational infrastructure alongside proposed habitat creation areas. As such, it is not clear how the interaction between infrastructure and proposed habitats has been accounted for within the BNG assessment. The Council therefore	

Para Ref.	HDC Comments	Applicant Response
	requests that a post-development BNG figure is provided to clearly show the spatial relationship between solar infrastructure and proposed habitats.	
6.135	The Council notes that the predicted biodiversity net gains are dependent on the successful establishment and long-term management of created habitats, particularly species-rich grassland. Many of the proposed habitat creation areas are currently under arable cultivation and may therefore have elevated nutrient levels, which can present challenges for the establishment of species-rich grassland without appropriate soil preparation measures.	
6.136	The Council also notes that modified grassland habitat is proposed within fields containing solar panels, where shading, changes in rainfall distribution and operational management constraints may influence habitat establishment and condition. The BNG assessment currently assumes that these habitats will achieve moderate condition, and the Council request clarification as to how this target condition has been determined and whether it is considered achievable in areas located beneath or adjacent to solar infrastructure.	
6.137	Mitigation required The Council considers that further clarity is required regarding how the predicted BNG will be secured and delivered through the LEMP, including how the management prescriptions within the LEMP link to the proposed biodiversity net gain commitment and demonstrate how the targeted BNG outcomes will be achieved.	
6.138	In particular, the Council considers that additional details would be beneficial regarding the long-term management, monitoring and resourcing of habitat creation measures, including the frequency and scope of monitoring, over the operational lifespan of the	

Para Ref.	HDC Comments	Applicant Response
	Scheme (up to 40 years). This will be necessary to ensure that the biodiversity gains predicted by the BNG assessment are achieved and maintained and that habitat establishment and wider ecological outcomes are effectively monitored.	
6.139	The Council notes that the habitat mapping provided within the oLEMP does not show the full extent of operational infrastructure across the Site, with solar panel arrays, access tracks and other infrastructure not presented on the habitat plans beyond the battery storage and substation. While the BNG assessment assumes that a proportion of land will be occupied by infrastructure, the absence of these elements from the habitat figures makes it difficult to understand how proposed habitats will spatially interact with the operational layout of the Scheme. The Council considers that the post-development habitat plans should clearly show the location of solar panels, access tracks and associated infrastructure alongside proposed habitat creation and enhancement areas to improve transparency of the assessment.	
6.140	The Council also notes that the BNG assessment largely distinguishes between habitats which are retained and those proposed to be newly created. While habitat creation forms an important component of the BNG strategy, the Council considers that opportunities may also exist to enhance existing habitats within the Site, particularly retained hedgerows and other linear features. The Council would welcome consideration of whether such enhancement opportunities could be incorporated within the habitat management strategy to strengthen habitat connectivity and biodiversity outcomes across the Site.	
6.141	The Council would also welcome consideration of additional opportunities to enhance watercourse habitats where practicable, including through improvements to channel condition, riparian vegetation and wider habitat connectivity, in order to maximise biodiversity benefits associated with the Scheme.	

Para Ref.	HDC Comments	Applicant Response
6.142	<u>Decommissioning Phase Impacts:</u> Positive Removal of solar infrastructure at the end of the operational life of the Scheme may provide opportunities for restoration of the Site and potential retention or adaptation of habitats established during operation.	
6.143	Neutral Decommissioning activities will be temporary and undertaken in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP).	
6.144	Negative Application documents indicate that solar infrastructure will be removed and the land restored following decommissioning, with the future land use determined at that time. The Council notes that habitats created as part of the BNG strategy would therefore revert to landowners once the Scheme is decommissioned.	
6.145	The Council is concerned that the long-term retention and management of habitats created to deliver the predicted biodiversity net gains are not currently secured beyond the operational lifetime of the Scheme. As a result, the biodiversity enhancements identified in the BNG assessment may not represent permanent biodiversity gains.	
6.146	Mitigation required The Council considers that further clarification is required regarding the intended approach to habitat retention and long-term management following decommissioning. In particular, the Council would welcome confirmation as to whether habitats created as part of the BNG strategy could be retained where appropriate, and how the long-term biodiversity benefits associated with the Scheme would be secured.	

Para Ref.	HDC Comments	Applicant Response
6.147	Flood Risk and Drainage Relevant Development Plan policy: Policy LP5 requires that development is only supported where all forms of flood risk, including defence breaches or failures, have been fully addressed in line with national guidance and the Cambridgeshire Flood and Water Supplementary Planning Document (2017). Proposals must pass the sequential test (and the exception test where necessary), locate development within the site to avoid flood risk, take all reasonable opportunities to reduce overall flood risk, avoid adverse effects on flood defences, and meet all SPD requirements.	The Applicant notes and welcomes the Council's conclusions regarding their assessment of flood risk and the application of the Sequential test. The Applicant also concurs with the Council that there would be a neutral impact from the Scheme in the context of flood risk.
6.148	Summary: 6.148 Hydrology and Flood Risk are considered within Chapter 8 of the ES [APP-042] and supporting figures and appendices, identifying any likely significant effects	
6.149	Detailed technical comments on flood risk and drainage matters are deferred to Cambridgeshire County Council, in its role as Lead Local Flood Authority (LLFA), and to the Environment Agency (EA). The assessment below therefore focuses on the Sequential and Exception Tests, which are policy considerations required under Policy LP5 of Huntingdonshire's Local Plan to 2036 and the National Planning Policy Framework (2024).	
6.150	The majority of the Site lies within Flood Zone 1, as defined by the EA's Flood Map for Planning and confirmed in Huntingdonshire District Council's Strategic Flood Risk Assessment (2025). Small parts of the Order Limits intersect Flood Zones 2 and 3, associated with the Pertenhall Brook, River Kym and smaller watercourses within Sites A, B and C, the section of the grid connection corridor crossed by the Duloe Brook, and the Honeydon and Colmworth Brooks adjacent to the Eaton Socon Substation land. Parts of the	

Para Ref.	HDC Comments	Applicant Response
	Site are also identified as being at risk of surface-water (pluvial) flooding.	
6.151	Accordingly, the Applicant has undertaken a Sequential Test followed the Exception Test. The Applicant's approach is set out in Section 4.1 of ES Vol 2 Appendix 8-1: Flood Risk Assessment P01 [APP-098] (FRA). Based on the information provided, HDC notes that the Applicant has considered both fluvial and pluvial flood risk within its broader site-selection process. The layout places all critical infrastructure outside of Flood Zones 2 and 3. Some solar arrays are located within areas mapped as being at risk of surface-water flooding. Where this occurs, the FRA confirms that the arrays would be installed so that the underside of the panels is above the modelled maximum flood level, with only support legs situated within areas of predicted inundation. Where parts of the Scheme are located within fluvial or surface-water flood-risk areas, the Applicant has identified either that the development is not adversely affected by the risk or that mitigation measures are incorporated into the design which are reflected in the Design Parameters and Principles Statement [APP-153] which is secured by a Requirement of the draft DCO [PDA-005].	
6.152	In relation to the identification of reasonably available sites, the Applicant's FRA describes a site-selection process driven primarily by the need to locate the Scheme within a viable distance of a point of connection with adequate grid capacity. A 15 km search area around Eaton Socon Substation was reviewed against a range of environmental and planning constraints, including areas of higher fluvial and surface-water flood risk. The Applicant concludes that all potential search areas were subject to varying degrees of constraint and that, when balanced collectively, the chosen landholding represented the most suitable and deliverable option.	

Para Ref.	HDC Comments	Applicant Response
6.153	On the basis of the information submitted, there is no clear evidence before the Council that the Applicant's approach to the sequential and exception tests conflict with the requirements of Policy LP5 or the NPPF 2024. Accordingly, the Council is content to note the Applicant's position on both the sequential test and, where relevant, the exception test, but defers to the EA and other statutory flood-risk bodies on the technical adequacy of the assessment.	
6.154	Overall, the local impact in terms of flood risk is considered to be neutral, subject to resolution of any outstanding matters raised by the LLFA (Section 6 of CCC's Relevant Representation [RR-150]) and the EA ([RR-367]), as the relevant statutory authorities for this topic.	
6.155	<u>Heritage Impacts (Above-Ground Heritage Assets)</u> <u>Relevant Development Plan policy:</u> Policy LP34 of Huntingdonshire's Local Plan to 2036 states that great weight and importance is given to the conservation of heritage assets and their settings. The statutory presumption of the avoidance of harm can only be outweighed if there are public benefits that are powerful enough to do so.	The Applicant agrees that these are the relevant local plan policies relating to above ground heritage.
6.156	Policy GSNP10 of the Great Staughton Neighbourhood Plan (2021 to 2026) identifies several non-designated heritage assets, including Asset 7: Ridge and Furrow Fields, which is in proximity to the Order Limits. Development affecting these assets must be assessed against the scale of harm and the asset's significance, in line with the NPPF and Local Plan Policy LP34.	
6.157	<u>Summary:</u> Cultural Heritage and Archaeology are considered within Chapter 6 of the ES [APP 042] and supporting figures and appendices. As set out in paragraph 9.1 of HDC's Relevant Representation, comments	The Applicant notes these comments.

Para Ref.	HDC Comments	Applicant Response
	on archaeology are deferred to the Historic Environment Team at CCC.	
6.158	The proposed development is located in farmland situated south of Great Staughton and Kimbolton Conservation Areas. Direct impact on those heritage assets or associated listed buildings is likely to be limited, provided that construction traffic in those areas is managed appropriately during construction and decommissioning phases.	
6.159	Longer term impacts through the operation phases of the solar farm will be confined to the settings of the listed buildings and the wider historic landscapes associated with the Great Staughton and Kimbolton Conservation Areas. Solar panels and associated infrastructure has been located in a way that avoids substantial impacts to the significance of the heritage assets. The loss of rural landscape character caused by industrialisation of the farmland will be less than substantially harmful to the significance of the heritage assets but can be mitigated to an extent by the proposed additional planting.	
6.160	There would be a neutral impact on non-designated heritage asset 7: Ridge and Furrow Fields identified in the Great Staughton Neighbourhood (2021 to 2026) during all phases of the project.	
6.161	<u>Construction Phase Impacts:</u> Positive No positive impacts or effects are anticipated during the construction phase.	The Applicant notes these comments and welcomes recognition from the Council that any effects can be mitigation through the provisions that are set out within the **oCEMP [REP1-032] / oCTMP [REP1-034]** and Schedule 2 of the draft **DCO [REP1-005].**
6.162	Neutral No neutral impacts or effects are anticipated during the construction phase.	

Para Ref.	HDC Comments	Applicant Response
6.163	Negative There is the potential for heavy construction traffic to cause damage to historic structures through vibration or collision and to harm the character of the conservation areas by adding noise, dust and movement.	
6.164	Mitigation required In accordance with the oCEMP (paragraph 2.5.2, p17) [APP-155], it is intended to route construction traffic away from Great Gransden and Kimbolton which will limit the direct impacts of vibration, noise and dust to heritage assets in those villages. For the settings of heritage assets, it is intended that best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with the oCEMP [APP-155]. These aspects are to be secured and controlled by Schedule 2 of the draft DCO [PDA-005].	
6.165	<u>Operational Phase Impacts:</u> Positive No positive impacts or effects are anticipated during the operational phase.	The Applicant notes these comments.
6.166	Neutral No neutral impacts or effects are anticipated during the operational phase.	
6.167	Negative No listed buildings or conservation areas fall within the Order Limits [APP-007]. The main impact to the significance of heritage assets in Huntingdonshire will be in the alteration to their settings through the visual impacts caused by solar panels and associated infrastructure.	The Applicant notes these comments.

Para Ref.	HDC Comments	Applicant Response
6.168	The Settings Impact Assessment [APP-083] concludes that there will be a limited impact to Kimbolton Conservation Area and associated listed buildings due to topography, intervening screening from vegetation and the existing built form of the village. This screening is enhanced by the location of the village in the valley base of the River Kym.	
6.169	However, there are still concerns that the setting to Warren House will be negatively impacted as it is located on a ridge some 30 metres above Kimbolton. Assessment of the impact to the wider setting of this Grade II* listed building is particularly important as its elevated location gives it a prominence and overview that cannot be mitigated by additional screening.	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 'built as a vista' building in late C18 facing Kimbolton Park' (https://historicengland.org.uk/listing/the-list/listentry/1211750). The Applicant also 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 'feature within views from the house and its grounds'. Despite the discrepancy the Applicant has considered Warren House to have sensitivity in changes to views afforded from its elevated position and assessed that the building has 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]**. A settings assessment visit to the vicinity of Warren House was conducted which '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'* 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 *"Alterations to the asset's baseline setting, which do not affect*
6.170	The location for Warren House was chosen to allow expansive views across the Kym valley and associated countryside as well as Kimbolton Castle estate. Currently described as a 'vista' building in the listing description, this has been taken by the Applicant to suggest that its primary significance is as a feature within the landscape as viewed from Kimbolton Castle. This may relate to one phase of the building but as Caroline Stanford argues, Warren House is a rare surviving example of a warren lodge which "acted as a stamp of authority on the landscape, providing wide views and often in commanding positions" (The Warren House, Kimbolton, Cambridgeshire: a rare & interesting survival. Transactions of the Ancient Monuments Society, Vol 58. 2014). With this interpretation the significance of the Heritage Asset relies not only on how it is experienced in proximity to Kimbolton Castle and its parkland but in the contribution of the wider landscape setting to the significance of the building from its elevated location.	

Para Ref.	HDC Comments	Applicant Response
6.171	At the time of writing the Applicant does not appear to have undertaken a full assessment of the visual impact of the solar panels and infrastructure in views from Warren House towards Site B to the south. 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 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.	*the ability to understand, appreciate or experience the contribution that setting makes 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**]. 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. The Applicant therefore maintains the setting assessment conclusions as reported.
6.172	To the south of Great Staughton Conservation Areas the solar arrays of Site C will extend into the rising southern valley side that ends in a ridge some 30m above the River Kym. The topography will partly negate the impact of screen planting and it is likely that any planting will take a relatively long time to be established at the height and density required to be effective. The impact will be greatest when travelling along Causeway between Great Staughton The Town Conservation Area and Great Staughton The Highway Conservation Areas.	
6.173	Mitigation required The proposed screen planting is likely to be moderately effective in the longer term but will take some time to become established. With the mitigation proposed, the harm to the significance of Heritage Assets is likely to be less than substantial. It is unlikely that screening can be used to mitigate the impact of the solar panels on the wider setting to Warren House; nevertheless, the impact is likely to be less than substantial.	

Para Ref.	HDC Comments	Applicant Response
6.174	The outline Heritage Enhancement Strategy [APP-167] key aims and objectives primarily concentrate on archaeological assets of the Romano-British period. This misses out on an opportunity to research, collate and present new evidence for post-Roman, early medieval and post Conquest land use in a way that informs the historian and wider public on the development of Great Staughton.	The Applicant will seek to discuss this matter with HDC following Deadline 2 to establish whether it is necessary to change the scope of the **outline Heritage Enhancement Strategy [APP-167].**
6.175	It is important to present a narrative that links the archaeological assets with those existing above ground and through which aims to enhance the significance of the historic environment as a whole. Particularly as the scheme bisects Great Staughton Parish which will further obscure the spatial and historic relationship between the scheduled manorial site of Cretingsbury and the historic built form of Great Staughton.	
6.176	<u>Decommissioning Phase Impacts:</u> Positive Removal of solar panels and associated infrastructure will re-establish the rural character of the settings to the heritage assets which will enhance their significance.	The Applicant notes these comments and welcomes recognition from the Council that any effects can be mitigation through the provisions that are set out within the **oDEMP [REP1-038]** and Schedule 2 of the draft **DCO [REP1-005].**
6.177	Neutral The potential removal of screening by land owners after decommissioning is likely to have a neutral impact on the significance of heritage assets as they are experienced within their wider settings. The retention or removal of tree belts and hedgerows is not likely to change the rural character of the landscape.	
6.178	Negative There is the potential for heavy traffic to cause damage to historic structures through vibration or collision and to harm the character of the conservation areas by adding noise, dust and movement during decommissioning.	

Para Ref.	HDC Comments	Applicant Response
6.179	Mitigation required All decommissioning traffic should be routed away from Great Gransden and Kimbolton to limit the direct impacts of vibration, noise and dust to heritage assets in those villages. For the settings of heritage assets, best practice measures will be implemented to control noise, light, vibration, and vehicle movements to be secured through the oDEMP [REP1-038] in Schedule 2 of the draft DCO [PDA-005].	
6.180	<u>Amenity, including impacts from noise and vibration, air quality and contamination</u> <u>Relevant Local Plan policy:</u> Policy LP14 (Amenity) of Huntingdonshire's Local Plan to 2036 states that a proposal will be supported where a high standard of amenity is provided for all users and occupiers of the proposed development and maintained for users and occupiers of neighbouring land and buildings.	The Applicant agrees with the Council's list of relevant local plan policy.
6.181	Policy LP36 (Air Quality) addresses air quality and sets out when an Air Quality Assessment and appropriate mitigation, including a Low Emissions Strategy where necessary, is required.	
6.182	Policy LP37 (Ground Contamination and Groundwater Pollution) addresses ground contamination and groundwater protection, setting out when investigation, risk assessment and any necessary remediation or safeguards are required.	
6.183	Policy LP10 (The Countryside) part c. states that development in the countryside must not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.	

Para Ref.	HDC Comments	Applicant Response
6.184	Noise and Vibration Summary: Noise and Vibration are considered within Chapter 10 of the ES [APP-046] and supporting figures and appendices. Various management plans have been submitted covering construction, operational and decommissioning noise and vibration, as well as construction hours. These controls will mitigate local noise emissions and are agreed by HDC. HDC are also satisfied that there are no significant adverse cumulative effects of noise and air quality.	The Applicant notes and welcomes the Councils position regarding the conclusions of their assessment of noise and vibration, and their acceptance of the mitigation measures referenced in relation to this topic.
6.185	Construction Phase Impacts: Positive No positive impacts or effects are expected during the construction phase.	
6.186	Neutral The ES Chapter 10, Table 10.8 [APP-046] identifies threshold noise levels of 65dB LAeq (0700–1900 weekdays; 0700–1200 Saturdays), 45dB LAeq (night) and 55dB LAeq (evenings and weekends) in accordance with BS 5228. These levels are acceptable.	
6.187	Construction traffic noise is expected to increase by 1 - 3dB, representing a minor (slight) and acceptable impact.	
6.188	Construction vibration is predicted between 0.3 - 1.0 mm/s PPV, also a minor (slight) and acceptable impact.	
6.189	The proposed construction hours (08:00 - 18:00 Monday – Friday; 08:00 - 13:00 Saturday) are acceptable.	

Para Ref.	HDC Comments	Applicant Response
6.190	Negative Potential for unacceptable noise if activities are not planned and managed correctly.	
6.191	Mitigation required No additional mitigation is required beyond securing the oCEMP [APP-155] and the oCTMP [APP-156] as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.	
6.192	<u>Operational Phase Impacts:</u> Positive No positive impacts or effects are expected during the operational phase.	
6.193	Neutral Solar power plant is typically quieter than traditional power plants.	
6.194	Negative Potential for unacceptable noise if not managed appropriately.	
6.195	Mitigation required No additional mitigation is required beyond securing the oCEMP [APP-155] as a Requirement of the DCO.	
6.196	<u>Decommissioning Phase Impacts:</u> Positive No positive impacts or effects are expected during the decommissioning phase.	
6.197	Neutral Noise levels expected to be lower than during construction.	

Para Ref.	HDC Comments	Applicant Response
6.198	Negative Potential for unacceptable noise if not managed appropriately.	
6.199	Mitigation required No additional mitigation is required beyond securing the oDEMP [REP1-038] as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.	
6.200	Air Quality <u>Summary:</u> Air Quality is considered within Chapter 11 of the ES [APP-047] and supporting figures and appendices.	The Applicant notes and welcomes the Council's position regarding the conclusions of their assessment of air quality and their acceptance of the mitigation measures referenced in relation to this topic.
6.201	Solar farms generally benefit air quality when compared with fossil-fuel electricity generation. The proposed outline management plans covering construction, operational and decommissioning will mitigate local air pollution and agreed by HDC.	
6.202	<u>Construction Phase Impacts:</u> Positive No positive impacts or effects are expected during the construction phase.	
6.203	Neutral Compliance with oCEMP and oCTMP will ensure negligible impacts on air quality.	
6.204	Negative Potential dust and emissions if not properly controlled.	
6.205	Mitigation required No additional mitigation is required beyond securing the oCEMP [APP-155] and the oCTMP [APP-156] as a Requirement of the	

Para Ref.	HDC Comments	Applicant Response
	DCO and the implementation of the Considerate Contractor Scheme.	
6.206	Operational Phase Impacts: Positive While there are no direct local amenity benefits, solar power has significant national and global air-quality and climate benefits compared with fossil-fuel generation, including: No emission of NOx, SO_2, $PM_{2.5}$, PM_{10}, ozone precursors or combustion by-products linked to respiratory and cardiovascular disease; Significantly reduced greenhouse gas emissions (CO_2 , methane), contributing to climate mitigation and associated health benefits such as heat stress, vector borne diseases and extreme-weather impacts.	
6.207	Neutral No neutral impacts or effects are expected during the operational phase.	
6.208	Negative Potential heat-island effect due to heat absorption and re-radiation.	
6.209	Mitigation required No mitigation required.	
6.210	Decommissioning Phase Impacts: Positive No positive impacts or effects are expected during the decommissioning phase.	
6.211	Neutral Compliance with the oDEMP will ensure negligible impacts on air quality.	

Para Ref.	HDC Comments	Applicant Response
6.212	Negative Potential dust and emissions if not properly controlled.	
6.213	Mitigation required No additional mitigation is required beyond securing the oDEMP [REP1-038] as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.	
6.214	Ground Conditions/Contamination <u>Summary:</u> Ground Conditions are considered within Chapter 12 of the ES [APP-048] and supporting figures and appendices. The ES identifies that intrusive investigation will be required where ground disturbance is proposed. Particular attention will be given to former buildings, infilled ponds and the former oil pipeline. The oCEMP [APP-155] will set out the required procedures. HDC are also satisfied that there are no significant adverse cumulative effects in terms of land contamination.	The Applicant notes and welcomes the Council's position regarding the conclusions of their assessment of air quality and their acceptance of the mitigation measures referenced in relation to this topic. The Applicant further acknowledges and agrees with the Council's conclusions regarding cumulative effects in terms of land contamination and concurs that positive impacts can be delivered upon decommissioning.
6.215	<u>Construction Phase Impacts:</u> Positive Potential remediation of contamination associated with former buildings, infilled ponds and the former oil pipeline.	
6.216	Neutral No neutral impacts or effects are expected during the construction phase.	
6.217	Negative Potential spillage fuels, oils and lubricants from plant and machinery. Potential soil degradation through compaction, erosion or changes to soil hydrology affecting runoff or drainage patterns.	

Para Ref.	HDC Comments	Applicant Response
6.218	Mitigation required Investigation and remediation (as necessary) of potential contamination at former buildings, infilled ponds and the former oil pipeline, secured through oCEMP [APP 155], Outline Soil Management Plan [APP-161] and Outline Waste Management Plan (oWMP) [APP-164] as a Requirement of the DCO.	
6.219	Operational Phase Impacts: Positive No positive impacts or effects are expected during the operational phase.	
6.220	Neutral No neutral impacts or effects are expected during the operational phase.	
6.221	Negative Potential contamination from broken panels (e.g. lead, tin, cadmium), transformer oils or cleaning chemicals.	
6.222	Mitigation required Written operational procedures for dealing with liquid spillages and broken panels.	
6.223	Decommissioning Phase Impacts: Positive Soil nutrition and fertility potentially restored. Land may be returned to organic or low-impact arable farming.	
6.224	Neutral No neutral impacts or effects are expected during the decommissioning phase.	

Para Ref.	HDC Comments	Applicant Response
6.225	Negative Potential spillage oils, lubricants or fuels from plant and machinery.	
6.226	Mitigation required No additional mitigation is required beyond securing the oDEMP [REP1-038] as a Requirement of the DCO and the implementation of the Considerate Contractor Scheme.	
6.227	Land and Soils It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.	This is noted by the Applicant.
6.228	Relevant Development Plan policy Policy LP10 states that all development in the countryside must seek to use land of lower agricultural value in preference to land of higher agricultural value.	The Applicant agrees that this is a relevant local plan policy in the context of this matter.
6.229	Summary: Land and Soils are considered within Chapter 13 of the ES [APP-041] and supporting figures and appendices. The chapter assesses how the Scheme has	The Applicant agrees with the Council's summary of this matter.
6.230	The assessment of baseline conditions for agricultural land classification (ALC) acknowledges that it is not a complete survey in accordance with the Code of Practice but represented a survey	

Para Ref.	HDC Comments	Applicant Response
	approach discussed with Natural England. Unclassified land has been assumed to be Grade 2 land.	
6.231	Information is provided also on soil resources and mineral reserves. Assessment is based on guidelines published by Institute of Environmental Management and Assessment, now known as Institute of Sustainability and Environmental Professionals.	
6.232	An agricultural land classification survey, including the grid corridor is the basis for assessment of the effects on land and soil receptors at construction.	
6.233	Embedded mitigation is provided in the preparation of an oSMP [APP-161]. The plan has been informed by the relevant good practice guidance. It is acknowledged that if the DCO is granted the oSMP will be developed into a detailed SMP and approved prior to construction.	
6.234	<u>Construction Phase Impacts:</u> Positive No positive effects of construction are identified.	The Applicant notes this point
6.235	Neutral Neutral or negligible effects are recognized in relation to the mineral reserves, which would not be sterilized by the Scheme.	The Applicant notes this point
6.236	Negligible construction effects (although described as negligible adverse) are accepted as neutral and identified for each of the four soil types identified within the Scheme. This is based on the resilience of soil types and embedded mitigation.	Ther Applicant notes and agrees with the Council's conclusions.

Para Ref.	HDC Comments	Applicant Response
6.237	Negative In construction, moderate adverse (significant) effects on Grade 2 agricultural land are identified. This negative effect is a consequence of taking best and most versatile (BMV) land from arable production. Where land survey information is missing, a worst-case effect is assumed, and a moderate adverse effect has been applied.	Please refer to the Applicant's detailed response to paragraph 16.8 of BBC's LIR on land and soil matters.
6.238	Subgrade 3a land is also BMV land. Its removal from arable cropping is assessed as a minor adverse (not significant) effect. Similarly, the removal of Subgrade 3b land (not BMV) from arable farming is identified as a minor adverse effect.	
6.239	The areas of permanent and reversible effects are identified in tabulated form, differentiating between ALC grades. Permanent effects are described as BESS, substation, transformers, cabling and access tracks, even though there would be removal on decommissioning. The Council recognises the potential for permanent diminution of land classification.	
6.240	However, permanent effects do not include the area of landscape mitigation planting of hedgerows and trees, which are anticipated to be retained. The oLEMP [REP1-040] include approximately 19ha of native species woodland and 17.4km of native hedgerows. Whilst this does not negatively affect the soil resources, it increases the removal of BMV land from agricultural production.	
6.241	Mitigation required Mitigation is embedded mitigation provided by the oSMP [APP-161] and no additional mitigation is proposed or required.	

Para Ref.	HDC Comments	Applicant Response
6.242	Access to 5.4% of the Scheme area was not available. In the absence of data, the EIA assumed the worst-case outcome that the land is Grade 2. This enables assessment of worst-case effects of the Scheme.	
6.243	However, the Council considers it important that the data should be available for preparation of a detailed SMP (proposed post consent and to be substantially in accordance with the oSMP). The missing data is required for recognition of soil types, ensuring their protection, and for the segregation of soil types for short-term and long-term storage.	
6.244	<u>Operational Phase Impacts:</u> Positive A potential beneficial effect to soil resources during the operational phase is recognized resulting from the absence of cultivation of the land and maintenance of permanent vegetation cover. The application of magnitude and sensitivity criteria to the assessment to present a significant beneficial effect is likely to be overstated. The Council considers the potential beneficial effect to be minor and not significant.	The Applicant welcomes the Council's acknowledgement that the Scheme will have a beneficial effect on soil resources during the operational phase. The assessment of beneficial effects on soil resources has been undertaken based on the methodology set out in Section 13.4 of **ES Vol 1 Chapter 13 Land and Soils [APP-049]**. During operation, substantial areas of the Order limits would move from intensive arable cultivation to long term vegetated cover (grazing pasture/neutral grassland and other habitats), managed through the **oLEMP [REP1-040]**, **oOEMP [REP1-036]** and **oSMP [REP1-044]**. This land management change is expected to improve soil structure and functioning, support increases in soil organic carbon, and reduce runoff and siltation compared to periods of bare ground in arable rotations. Under the assessment methodology, a 'high' beneficial magnitude applies where there is potential for improvement in one or more soil functions/volumes due to restoration over an area greater than 20 ha. Given the Scheme's scale and the extent of land transitioning to grassland/vegetated cover, the 'high' magnitude judgement is considered proportionate. When combined with the conclusion that the principal soil types are generally of medium sensitivity, the result is a moderate beneficial effect. The Applicant therefore stands by their assessment.

Para Ref.	HDC Comments	Applicant Response
		The Applicant has however set out in paragraph 8.3.45 of the **Planning Statement [APP-031]** that, in their view, this beneficial effect should only be afforded limited positive weight in the planning balance, which would appear to be consistent with the Council's view on this matter.
6.245	Neutral Following construction, the residual effect on land classification by grade is negligible and determined to be neutral.	The Applicant has no further comments on these points and agrees with the Council's assessment and agreement on the necessary mitigation measures and level of effect.
6.246	Operational effects on the mineral reserves remain neutral.	
6.247	Negative No negative effects resulting from operation are identified. Negative legacy effects of construction are possible are not a direct function of operation, but nonetheless mitigation is addressed below.	
6.248	Mitigation required Mitigation will be provided by the SMP, which should include details of monitoring of visual indicators of unhealthy soil conditions and potential remedial action. No other mitigation is required beyond that specified in the oSMP.	
6.249	<u>Decommissioning Phase Impacts:</u> Positive No positive effects of decommissioning are identified.	
6.250	Neutral It is acknowledged that the effects at decommissioning would be of a broadly similar magnitude of impact to the impacts during construction.	

Para Ref.	HDC Comments	Applicant Response
6.251	The decommissioning phase has a neutral effect on mineral reserves.	
6.252	Negative Whilst decommissioning effects in relation to land and soils would largely mirror those in construction the removal of components of the Scheme to include the East Park BESS, substation and cabling recognizes the potential for permanent negative effects to soil condition and by extension land classification.	
6.253	Mitigation required The decommissioning activities would be completed in substantial accordance with the oSMP and oDEMP.	
6.254	The survey of missing data required pre-construction (to complete baseline data) will be required to provide restoration outcomes after decommissioning. ALC survey should follow five years after decommissioning. Remedial measures will be required in a new SMP if restoration is incomplete.	The Applicant notes this comment. The Applicant has updated the **oSMP [REP1-044]** to state under paragraph 8.1.4 that: "*Further agricultural land classification and soil resource surveys will be undertaken post-consent and prior to commencement of construction to inform the detailed Soil Management Plan. 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.*"
6.255	<u>Socio-economics, land-use, and tourism</u> It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This	The Applicant notes this point.

Para Ref.	HDC Comments	Applicant Response
	content is therefore included within Huntingdonshire District Council's submission for completeness.	
6.256	Relevant Development Plan policy: Relevant Development Plan policies include LP29 (Health Impact Assessment), LP10(c) (effects on the use and enjoyment of the countryside), LP16 (Sustainable Travel), LP17 (Parking and Vehicle Movement) and LP14 (Amenity). Elements of LP3 (Green Infrastructure) are also relevant where impacts relate to recreational access and PRoW.	It is agreed by the Applicant that part, so those policies are likely to be or relevance to the assessment of socio economic effects.
6.257	Summary: Socio-economics, Land-use and Tourism matters are considered within Chapter 14 of the ES [APP-050]. The chapter assess how the Scheme 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 Scheme; worker requirements during all phases; changes in access to facilities during construction 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 phases and on journeys both for recreation and accessing services and facilities.	The Applicant notes this comment.
6.258	During construction and decommissioning, the Applicant assesses the Scheme as resulting in a significant moderate beneficial effect on the economy at the local level. The Council considers that there is the potential for a positive effect on the economy but appropriate provision must be made to deliver employment and skills benefits/opportunities locally to realise this. The Council therefore seek to maximise potential benefits with regards to the local economy, skills, education and employment opportunities through working with the Applicant and engaging with local stakeholders	Please refer to the Applicant's assessment of paragraph 17.5 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
	where appropriate. The Council considers that the Outline Skills Supply Chain and Employment Plan (oSSCEP) currently lacks specific detail on needs addressed, initiatives and a delivery programme to maximise benefits, which the Council requests is addressed.	
6.259	The Council requests that further information is provided by the Applicant regarding impacts on services during construction and decommissioning, specifically relating to potential severance of access to healthcare services and mitigation for potential impacts. The Council further considers in respect of recreation that an assessment of impacts on all users of PROW, not only tourism related PROW use, should be provided to confirm that no significant effects would arise.	Please refer to the Applicant's assessment of paragraph 17.6 of BBC's LIR above.
2.260	The Council notes that there is no Health chapter in the ES or Health Impact Assessment. The Council would welcome an assessment to demonstrate that their residents' health and wellbeing would not be adversely impacted by the Scheme during all phases of development.	Please refer to the Applicant's assessment of paragraph 17.7 of BBC's LIR above.
2.261	Finally, during operation, the Council agrees that socio-economics, land-use and tourism effects would be not significant.	The Council's agreement on this point is welcomed by the Applicant .
2.262	<u>Construction Phase Impacts:</u> Positive The Scheme 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 the construction phase. The Applicant assesses economic impacts in relation to 30-minute and 90-minute drive times from the Site as set out in para14.4.6. However, which effects constitute a local and which constitute a regional level of impact for the purpose of the assessment is not explained. Estimated employment creation	Please refer to the Applicant's assessment of paragraph 17.9 of BBC's LIR above

Para Ref.	HDC Comments	Applicant Response
	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 the Council considers would constitute local impact.	
2.263	The Council considers that there is the potential for a positive effect on the economy. However, it is considered that for a significant beneficial effect of moderate scale to be realised as concluded in para14.12.1, appropriate provision must be made to deliver employment and skills benefits/opportunities locally. Without such provision and such provision being secured in the DCO, it considers that the impact on the local economy could be beneficial but of a minor scale.	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 Socio[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 [REP1-005]** secures the submission of a final 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 HDC.
2.264	Neutral In regard to tourism, the Scheme has been identified as resulting in negligible effects on tourism during all phases. This includes in respect of impacts on users of PROW and Bridleways. Mitigation measures in the [APP-160] Outline PROW Management Plan are referred to which would limit impacts. Para14.4.19 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 activity has been presented, only impacts on tourism-related PRoW use. The Council considers that an assessment of impacts on all users of PRoWs should be provided to confirm that no significant effects would arise.	Please refer to the Applicant's Assessment of paragraph 17.10 of BBC's LIR above.

Para Ref.	HDC Comments	Applicant Response
2.265	Impact 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. In its assessment of impacts on private and community assets, the Applicant makes reference to impacts on access to and from economic assets, concluding that effects would be negligible, however community facilities do not appear have not been assessed for this impact. The Council considers there to be potential for effects in terms of severance of access to facilities, subject to the completion and f indings of junction counts and assessments requested in the Highways aspect of this representation. Specifically the Council considers 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.	Please refer to the Applicant's Assessment of paragraph 17.11 of BBC's LIR above
2.266	The Council notes that there is no Health chapter in the ES or Health Impact Assessment. The Council would welcome an assessment to demonstrate that their residents health and wellbeing would not be adversely impacted by the Scheme during all phases of development.	The Applicant notes this comment. Whilst a standalone Health Impact Assessment was scoped out of the ES, in agreement with PINS as per Scoping Direction, the Applicant has nevertheless provided an assessment of the Scheme on the 'wider determinants of health' within Section 16.2 of **ES Vol 1 Chapter 16 Other Environmental Topics [APP-052]**. Section 16.2 concludes that the Scheme is unlikely to result in significant effects on human health (including both physical health and mental wellbeing), at any phase of the development because the relevant health pathways are either not present or are controlled through the mitigation embedded in the topic chapters and secured management plans.
2.267	Negative No negative socio-economics, land-use and tourism effects arising from construction of the Scheme have been identified.	The Applicant notes this point.

Para Ref.	HDC Comments	Applicant Response
2.268	Mitigation required Relevant to its assessment of beneficial effects on the local economy, the Applicant's [APP-163] Outline Skills Supply Chain and Employment Plan (oSSCEP) sets out a strategy to maximise local employment, skills development and supply chain opportunities. The Council welcomes that the Applicant has prepared an oSSCEP. However, the Council considers that this currently 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, for example, it is not clear on the timeline for developing the strategy when stakeholder engagement will take place and how regular this will be.	Please refer to the Applicant's response to paragraph 2.263 of HDC's LIR above.
2.269	Pending consideration of impacts on access to healthcare facilities by the Applicant, where impacts are identified or have the potential to arise, appropriate mitigation measures should be identified to reduce, minimize or avoid impacts on the local community.	Please refer to the Applicant's response to paragraph 17.6 of BBC's LIR above.
2.270	<u>Operational Phase Impacts:</u> Positive The Scheme has been assessed by the Applicant as resulting in a not significant minor beneficial effect on the economy at both the local level and regional levels. As noted above for construction impacts on the local economy, what constitutes local and regional impact levels for the purpose of the assessment is not explained in the chapter. Notwithstanding this, the Council agrees that effects would be not significant.	These points are noted by the Applicant.

Para Ref.	HDC Comments	Applicant Response
2.271	Neutral Neutral or negligible effects during operation are recognised in relation to tourism, private and community assets and development land.	
2.272	Negative No negative socio-economics, land-use and tourism effects arising from operation of the Scheme have been identified.	
2.273	Mitigation required No negative socio-economics, land-use and tourism effects arising from operation of the Scheme have been identified.	
2.274	<u>Decommissioning Phase Impacts:</u> As described for construction.	
2.275	<u>Climate change</u> It is noted that AECOM has been appointed, under a Memorandum of Understanding between the three Host Authorities and with the Applicant's agreement, to act as an external consultant on behalf of all three authorities in assessing this aspect and related matters. As the assessment has been undertaken on a combined basis rather than separated by local authority area, some elements may also appear in the other Host Authorities' Local Impact Reports. This content is therefore included within Huntingdonshire District Council's submission for completeness.	The Applicant notes this point.
2.276	<u>Relevant Development Plan policy:</u> LP35 (Renewable and Low Carbon Energy) is the primary policy relevant to climate change, as it sets the Council's approach to renewable and low-carbon energy development. Elements of LP5 (Flood Risk) and LP15 (Surface Water) are also relevant where climate change affects future rainfall, drainage and resilience.	The Applicant agrees that these local plan policies would be relevant to the assessment of climate change.

Para Ref.	HDC Comments	Applicant Response
2.277	Summary: The Scheme will result in a range of climate related impacts across construction, operation, and decommissioning.	The Applicant welcomes a positive summary of their assessment and confirmation it has been carried out in accordance with the necessary guidance.
2.278	Consistent with assessments undertaken for comparable NSIPs, construction and decommissioning phases are expected to generate negative greenhouse gas (GHG) emissions, primarily due to plant use, materials production, transport movements and land disturbing activities. No positive or neutral construction phase climate impacts have been identified. During operation, the Scheme would contribute to national decarbonisation objectives by facilitating lower carbon electricity generation, representing a positive climate impact, although some minor negative operational emissions remain unavoidable. The GHG assessment has been undertaken in line with ISEP guidance and sets out the beneficial impact of the Scheme overall in terms of contributing to UK's net zero goals.	
2.279	In relation to climate resilience, construction and decommissioning activities may be temporarily exposed to climate related hazards, such as extreme rainfall, heat events or high winds, representing negative short term resilience impacts. However, these do not influence the Scheme's long term climate performance. Operationally, the infrastructure may experience climate driven stressors linked to future temperature increases, wind loading, or precipitation intensity. These impacts were assessed in line with guidance issued by ISEP and found there to be no significant negative impacts if mitigated in line with embedded mitigations.	
2.280	With respect to Inter related Climate Change Impacts (ICCI), the Scheme may experience interactions between future climate conditions and environmental, social or operational topics, including drainage, landscape condition, biodiversity sensitivity, soil stability and welfare considerations for site personnel. These interactions	

Para Ref.	HDC Comments	Applicant Response
	constitute negative impacts across all phases unless appropriately mitigated as set out through the assessment. No positive or neutral ICCI effects were identified.	
2.281	Across all three assessments, effective mitigation—secured through the CEMP, OEMP and future Decommissioning Plans—is essential to reducing impacts. Required measures include low carbon construction practices, efficient logistics, climate resilient design specifications, extreme weather contingency protocols, and cross topic adaptation measures for drainage, soils and ecological management.	
2.282	<u>Construction Phase Impacts:</u> Positive No positive climate impacts arising from construction have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment.	The Applicant notes theses points and agrees with the council's conclusions regarding the level and type of mitigation that is deemed appropriate.
2.283	Neutral No neutral climate impacts arising from construction of the Scheme have been identified in the GHG Assessment, CRA or ICCI Assessment.	
2.284	Negative For the GHG Assessment, construction activities will generate greenhouse gas emissions from plant, materials manufacture, transport, and land disturbance. These emissions represent a negative impact on climate during the construction period.	
2.285	There are no negative impacts anticipated in the CRA or ICCI as working practices are anticipated to be able to adjust over the short construction period.	

Para Ref.	HDC Comments	Applicant Response
2.286	Mitigation required For the GHG Assessment, embedded and additional mitigation actions have been set out in paragraphs 15.7.3 and 15.9.2 respectively. These actions should be embedded and tracked throughout the design process.	
2.287	The oCEMP sets out mitigation measures for the CRA and ICCI. These actions should be embedded and tracked throughout the construction process.	
2.288	Operational Phase Impacts: Positive For the GHG Assessment, the Scheme will contribute to national decarbonisation objectives by supporting low carbon electricity generation, resulting in long term positive climate outcomes consistent with NPS EN 1.	
2.289	No positive climate impacts arising from operation have been identified in the CRA or ICCI Assessment.	
2.290	Neutral No neutral climate impacts arising from the operation of the Scheme have been identified in the GHG Assessment, CRA or ICCI Assessment.	
2.291	Negative For the GHG Assessment there are negative impacts on the climate from GHG Minor operational emissions, these are mostly resulting from replacement of equipment throughout the lifecycle of the Scheme. These emissions are exceeded by the offsetting benefits of low-carbon energy generation from the Scheme.	

Para Ref.	HDC Comments	Applicant Response
2.292	For the CRA there are negative impacts to the proposed development from climate change. These comprise impacts to operational equipment, vehicle access to the scheme, and on-site workers. These effects are all assessed to be slight/negligible and not significant.	
2.293	Mitigation required Operational emissions should be minimized through maximizing the lifecycle of components, and sourcing low carbon materials in replacement via the OEMP for mitigating GHG emissions.	
2.294	No additional mitigation is required for the CRA or ICCI assessments.	
2.295	<u>Decommissioning Phase Impacts:</u> Positive No positive climate impacts arising from decommissioning have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In-combination Climate Change Impacts (ICCI) Assessment.	
2.296	Neutral No neutral climate impacts arising from decommissioning of the Scheme have been identified in the GHG Assessment, Climate Risk Assessment (CRA) or In combination Climate Change Impacts (ICCI) Assessment.	
2.297	Negative Decommissioning activities, including dismantling, transport, plant use, and material processing, will generate greenhouse gas emissions comparable to construction works and therefore constitute a minor, not significant, negative climate impact.	

Para Ref.	HDC Comments	Applicant Response
2.298	There are no negative impacts anticipated in the CRA or ICCI as working practices are anticipated to be able to adjust over the short decommissioning period.	
2.299	Mitigation required No additional mitigation is required for decommissioning for the GHG assessment. The oDEMP sets out mitigation measures for the CRA and ICCI. These actions should be embedded and tracked throughout the decommissioning stage.	
6.300	Cumulative and In-Combination Effects With regard to cumulative impacts, the Council notes that these are limited to those identified in the relevant ES chapter and otherwise addressed within the individual technical chapters of the ES. The Council has reviewed the cumulative impacts within each topic area as set out in the preceding sections of this Local Impact Report. On this basis, the Council considers that the Applicant has assessed cumulative impacts across the affected environmental and technical areas to an appropriate level to enable a robust assessment of the Scheme's cumulative effects.	The Applicant notes and welcomes the Council's comments regarding the assessment on cumulative effects.
6.301	Other matters Draft Development Consent Order: Detailed comments on the Draft Development Consent Order (DCO) [PDA-005] relating to topic-specific environmental and technical matters are addressed within the relevant sections above. This section sets out additional points of principle regarding the drafting and structure of the DCO. These matters closely align with the concerns raised by the other Host Authorities, CCC and BBC in their respective Relevant Representations, which are referenced where applicable.	The Applicant notes this point.

Para Ref.	HDC Comments	Applicant Response
6.302	HDC supports the position set out in CCC's Relevant Representation (para. 14.2) [RR-150], which notes that Schedule 2 of the Draft DCO refers to "the local planning authority" without distinguishing between the authorities affected. As the scheme spans multiple administrative areas, including a two-tier system in Cambridgeshire and a separate authority in Bedfordshire, CCC advises that each Requirement should clearly specify which authority or authorities are responsible for discharging it.	The Applicant is conscious that the Authorised Development crosses administrative boundaries and has defined the term "local planning authority" within article 2(1) of the draft DCO accordingly. The term "local planning authority" in Schedule 2, and throughout the draft DCO, should be read as: "[…] *the local planning authority (as defined in section 336 of the* [Town and Country Planning Act 1990]*) for the area to which the provision relates".* The Applicant considers that this approach is appropriate as it allows the relevant local planning authority to be identified at the relevant time by reference to section 336 of the Town and Country Planning Act 1990. This approach is consistent with that taken in The Oaklands Farm Solar Park Order 2025, which relates to a site lying within both South Derbyshire District Council and Derbyshire County Council administrative areas. It is considered that if the Applicant were to identify the relevant local planning authority by name in each case, this would unnecessarily complicate the draft DCO. Moreover, there is the potential for local government reorganisation, which would mean that the draft DCO would also need to account for a situation where the role of the local planning authority passes to a successor organisation. Based on the above, the Applicant's intention is to retain its existing drafting within the draft DCO.
6.303	HDC concurs with the concerns raised by BBC (paras. 3.5(a)–(b)) [RR-111], which note that Schedule 1 of the Draft DCO does not sufficiently distinguish between Principal Development and Associated Development.	Please refer to the Applicant's response to paragraph 3.20 of BBC's LIR above.
6.304	HDC supports BBC's position (para. 3.11) that the Draft DCO must clearly define the terms "temporary" and "permanent" to ensure clarity across construction, operation and decommissioning.	Please refer to the Applicant's response to paragraph 3.28 of BBC's LIR above.

6.305 - 6.309	Replacement Phase: The Council notes that no comprehensive or stand-alone assessment has been provided of the potential impacts associated with the Replacement Phase of the Scheme. This concern has previously been raised by BBC in its Relevant Representations (paragraph 3.14), and the Council considers that the Replacement Phase warrants further review and assessment given the 40-year operational period and the likelihood of replacement cycles for both the solar and BESS infrastructure. Paragraph 2.4.10 of the oOEMP [REP1-036] states that, prior to any replacement activities involving more than 20% of solar panels, the operator must submit a notification to the relevant Local Planning Authority with details of the management measures to be put in place. The Council has several concerns with this approach. First, the provision does not prevent the operator from undertaking replacement activities in multiple smaller increments such that the 20% threshold may never be triggered. As drafted, it also fails to specify the timeframe within which the 20% threshold is calculated. It is therefore unclear whether this is intended to apply per year, per replacement cycle, over a 5-year period, or across the entire operational life of the Scheme. Without a temporal definition, the trigger is ambiguous and likely unenforceable. Furthermore, no technical or operational rationale has been provided to explain why 20% represents an appropriate threshold. Lastly, the Council notes that the notification requirement for replacement activities is contained only within the oOEMP and is not secured through a Requirement in the draft DCO [PDA-005]. This is insufficient. The Council suggests that the Replacement Phase needs to be a defined phase within the DCO itself so that associated triggers for the relevant Management Plans flow from a requirement secured within the DCO.	As set out in the Applicant's response to Matters 2 and 3 of BBC's LIR. The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken, and is preparing a standalone Technical Note providing more clarity on these works, the potential environmental effects, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.

Para Ref.	HDC Comments	Applicant Response
7.1	CONCLUSION This LIR has assessed the likely local impacts of the East Park Energy DCO Scheme within HDC's administrative area. The Council recognises the national need for renewable and low-carbon energy infrastructure and therefore supports the principle of development in accordance with national policy.	The Applicant notes and agrees with this comment regarding the principle of development.
7.2	However, as is typical for a scheme of this scale and nature, the assessment identifies a range of negative local impacts across several technical topic areas. These negative impacts give rise to varying degrees of tension with aspects of the Development Plan, particularly in relation to landscape and visual effects, the use of Best and Most Versatile (BMV) agricultural land, ecological impacts, the impact on heritage assets, and the adequacy of long-term management and monitoring arrangements.	The Applicant would refer the Council to the clarifications and further information they have provided to each of these topic areas in their response to both the Relevant Representations and this response to the LIR's. Whilst there might be tension with the development plan, the scheme meets the policy tests set out in NPS EN-1 which is the principal policy against which the scheme would be considered in planning terms.
7.3	The Council does not undertake a planning balance within this report. The LIR presents the local impacts (positive, neutral and negative) based on the evidence before the authority as of Deadline 1. The Council reserves the right to submit further Written Representations during the Examination to address updates, clarifications, or amendments to the Scheme proposals and associated documents.	The Applicant notes that the Council has refrained from carrying out a planning balancing exercise at this stage and they reserve their right to do so at a later deadline. The Applicant considers this to be a sensible and proportionate approach and that it would be preferable for the Host Authorities to present their planning balance later in the examination after further discussion on the key matters of concern. The Applicant remains willing to work with the Host Authorities on the resolution of any outstanding matters.
7.4	In summary, HDC considers that further information, clarification, and/or securing mechanisms are required to ensure that the impacts of the Scheme are minimised and appropriately controlled. These include, but are not limited to: - Additional commitments on landscape mitigation and hedgerow height management during operation and following decommissioning.	The Applicant has expressly dealt with each of these matters within their response to the LIR's submitted by the host authorities providing further information and clarification in relation to each. A summary of where each has been considered in the most detail is provided below. - Please refer to the Applicant's response to paragraph 6.12 and 6.13 of BBC's LIR

Para Ref.	HDC Comments	Applicant Response
	- Provision of additional survey data, mitigation detail and cross-referencing in relation to ecology, including ground-nesting birds, bats, hazel dormouse, water vole, otter and great crested newt.	- See the Applicant's response to paragraph 9.27 of BBC's LIR for a full response on this matter.
	- Clarification of potential hydrological and access impacts on County Wildlife Sites (Huntingdon Wood CWS, High Wood CWS, Kangaroo Meadows CWS), including shading effects.	- See the Applicant's response to paragraph 9.7 of BBC's LIR for a full response on this matter .
	- Clarification and securing of BNG outcomes, including a post-development BNG spatial plan showing interaction between solar infrastructure and proposed habitats.	- This matter is addressed in the Applicant's response to paragraph 9.17 of BBC's LIR above
	- Long-term habitat management commitments beyond the 40-year operational period.	- This matter is addressed in the Applicant's response to paragraph 6.14 of BBC's LIR above
	- Strengthening of the oLEMP in relation to buffer widths, grassland establishment methods, veteran tree protection and species-appropriate planting lists.	- This matter is addressed in the Applicant's response to paragraphs 9.17 – 9.19 of BBC's LIR above
	- A holistic biodiversity monitoring plan covering habitat condition, species and ecosystem function, together with commitment to an appropriate monitoring fee for BNG, ecology and landscape mitigation.	- This matter is addressed in the Applicant's response to paragraph 9.30 of BBC's LIR above
	- Lighting measures to be secured as a Requirement within the draft DCO.	- This matter is addressed in the Applicant's response to paragraph 9.14 of BBC's LIR above
	- Assessment of the impact to the Grade II* listed Warren House.	- This matter is addressed in the Applicant's response to paragraphs 6.169 – 6.173 of HDC's LIR above.

<table>
<tr><th>Para Ref.</th><th>HDC Comments</th><th>Applicant Response</th></tr>
<tr><td></td><td>- Full consideration and assessment of Replacement Phase impacts and securing an enforceable mechanism in the DCO.

- Completion of missing ALC baseline survey data prior to detailed SMP approval.

- Assessment of impacts on all users of PRoW (not only tourism-related use) and impacts on access to healthcare facilities.

- Additional detail and securing of commitments within the oSSCEP
.
- Resolution of outstanding matters raised by the LLFA and the EA in relation to flood risk and drainage.

- Amendments to the draft DCO.</td><td>- This matter is addressed in the Applicant’s response to Matters 2 and 3 of BBC’s LIR above

- This matter is addressed in the Applicant’s response to paragraph 6.254 of HDC’s LIR above

- This matter is addressed in the Applicant’s response to paragraph 17.6 of BBC’s LIR

- This matter is addressed in the Applicant’s response to paragraph 6.263 of HDC’s LIR above

- This matter is addressed in the Applicant’s response to paragraph 2.4.12 – 2.4.14 of CCC’s LIR above

- This matter is addressed in the Applicant’s response to paragraphs 6.301 to 6.304 of HDC’s LIR above</td></tr>
<tr><td>7.5</td><td>Subject to the resolution of the matters set out in this LIR, the Council will continue to work constructively with the Applicant, the Examining Authority, and the other Host Authorities to assist in the Examination of the Scheme.</td><td>The Applicant notes this point and maintains their commitment to engage with the Host Authorities pursuant to the resolution of outstanding concerns.</td></tr>
<tr><td>7.6</td><td>Having regard to the above, the table below provides a high-level summary of the impacts by topic, also taking account of any cumulative impacts related with that topic:
Table 1. High Level Summary of Positive, Neutral and Negative Impacts
<table><tr><td>Topic</td><td>Positive</td><td>Neutral</td><td>Negative</td><td>Development Plan Policy</td></tr></table></td><td>The Applicant would welcome the opportunity to discuss the Council’s Table based upon the responses they have provided to the Council’s Relevant Representations and LIR.

The Applicant would welcome further clarification regarding the specific phase of the development that the stated effects are deemed to occur and the specific basis upon which the conclusions have been drawn. The Applicant feels that these are likely to change in light of their submissions to the examination at Deadlines 1 and 2.</td></tr>
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Para Ref.	HDC Comments					Applicant Response
	Landscape and Visual			X	LP10, LP35, GSNP7	
	Ecology and Nature Conservation	X		X	LP30, GSNP11	
	Biodiversity Net Gain	X		X	LP30, GSNP11	
	Flood Risk and Drainage		X		LP5, LP15, GSNP15	
	Heritage Impacts			X	LP34, GSNP10	
	Noise and Vibration		X		LP14, LP10(c)	
	Air Quality		X		LP36	
	Ground Conditions /Contamination		X		LP37	
	Land and Soils	X		X	LP10	
	Socio-economics, land-use and tourism	X	X		LP29, LP10(c), LP16, LP17	
	Climate change	X		X	LP35, LP5, LP15	