EAST PARK ENERGY

East Park Energy

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Applicant Response to Written Representations

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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 Written Representations (WRs) submitted by Interested Parties 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 WRs submitted by Interested Parties at Deadline 1 of the examination of the application for development consent for the Scheme.

1.2.2 The Applicant has previously responded at Deadline 1 of the examination to Relevant Representations (RRs) submitted by Interested Parties during the pre-examination period. The Applicant's responses to RRs are set out in the following documents:

- **Applicant Responses to Relevant Representations – Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**; and
- **Applicant Responses to Relevant Representations – Thematic Responses [REP1-056]**.

1.2.3 In preparing this document, the Applicant has sought to avoid repeating points made in the above documents where practicable. In addition, the Applicant has only responded to substantive points, in particular where the Applicant considers matters set out in the application have been misunderstood/misinterpreted, or the consultee has requested clarification, additional information or has raised a point of disagreement that may not have been addressed in the Applicant's previous written submissions.

1.2.4 Accordingly, whilst the Applicant has considered all Written Representations submitted at Deadline 1, the Applicant has only responded to a selection of the Written Representations submitted at Deadline 1, and has not responded to every individual Written Representation.

1.2.5 The Applicant has responded to the 'Stop East Park Energy' Written Representation separately within the **Applicant Response to Stop East Park Energy [EN010141/DR/8.29]** which has also been submitted at Deadline 2. The Applicant's responses to Stop East Park Energy also cover many of the points made in other Written Representations submitted at Deadline 1.

1.3 Document Structure

1.3.1 This response document is structured as follows:

- Section 1.0 – Introduction;
- Section 2.0 – Host Authorities;
- Section 3.0 – Statutory Environmental Bodies;
- Section 4.0 – Statutory Undertakers; and
- Section 5.0 – Other Interested Parties.

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]**). 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]**.

2.0 RESPONSES TO WRITTEN REPRESENTATIONS – HOST AUTHORITIES

2.1 Response to Bedford Borough Council

Table 1: Response to Bedford Borough Council Written Representation (REP1-069)

Our Ref.	BBC Ref.	Theme	BBC Comments	Applicant Response
BBC-WR-01	1.5	The Scheme	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 vehicle movements and accommodation; noise and air quality impacts; and, the potential impact on instated hedgerows and culverts is not tabled for review. It is suggested that this requires review and that a Replacement Phase should be reflected appropriately in the DCO and associated Management Plans.	The assessment of 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 a consolidated summary of these works, the assessed environmental effects in the ES, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.
BBC-WR-02	1.6	The Scheme	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	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. If there are any specific uses of the term 'construction traffic' across any of the application

Our Ref.	BBC Ref.	Theme	BBC Comments	Applicant Response
			each phase has been assessed and addressed accordingly.	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 clarify.
BBC-WR-03	1.7	Enforcement	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.	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.
BBC-WR-04	1.8	General comments	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 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 Statement 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

Our Ref.	BBC Ref.	Theme	BBC Comments	Applicant Response
				wording of the management plans before impacts could occur. 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.
BBC-WR-05	1.9	Draft DCO	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 et al 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.

Our Ref.	BBC Ref.	Theme	BBC Comments	Applicant Response
				The Applicant is consulting with the host authorities' legal representation in relation to the drafting of the DCO.
BBC-WR-06	1.10	Design	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 Host 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 LPA 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 LPA 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 discharge mechanism. 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 LPA, which is intended to reduce the burden on the LPA. 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. A fee would be paid to the relevant LPA upon submitting an application to discharge a requirement, as set out in Requirement 27 in Part 2 of Schedule 2 of the **draft DCO [REP1-005]**.

Our Ref.	BBC Ref.	Theme	BBC Comments	Applicant Response
				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 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 is in accordance with relevant guidance on drafting.
BBC-WR-07	1.11	General comments	Clarity of Matters: it is suggested that most of the Matters raised in this report require clarity and resolution by the Applicant which can be resolved between Parties.	The Applicant notes this comment and is working proactively to provide the clarity on matters as requested by BBC.
BBC-WR-08	1.12	The Scheme	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 enhancement measures as put in place in perpetuity – the Council's position is consequently a caveated statement.	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 where such benefits may be time-limited; the weight given to such positive benefits in the planning balance is the

Our Ref.	BBC Ref.	Theme	BBC Comments	Applicant Response
				pertinent matter, rather than whether or not they are positive.
BBC-WR-09	1.13	Decommissioning	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]**.

2.2 Response to Cambridgeshire County Council

Table 2: Response to Cambridgeshire County Council Written Representation (REP1-073)

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-01	2.1	Landscape and Visual	The Proposed Development will have a significant adverse impact on the landscape and visually amenity. Cambridgeshire County Council's comments are limited to Public Rights of Way (PROW) and impact to non-motorised users using the local PROW network.	The Applicant acknowledges that CCC are limiting comments to impacts on the local PRoW network. The LVIA (**ES Chapter 5 [APP-041]**) identifies landscape and visual effects, including visual effects experienced by users of the Public Rights of Way network, and presents these on a receptor-specific basis in accordance with GLVIA3.
CCC-WR-02	3.1-3.4	Cultural Heritage and Archaeology	The council requests further details and assurance mitigations for Site C and the roman town scheduled monument will preserve the significant archaeological remains. The trial trenching report for Site C is excellent and provides considerable detail. The Site D report is interim in nature with the assessment of effects in the Environmental Statement (ES) relatively poorly informed. Note parts of the cable route have not been assessed. The use of concrete blocks in some areas of particularly complex archaeological remains is not suitable due to the potential for compression damage. Archaeological monitoring is not a suitable mitigation for most areas intrusive evaluation via trial trenching will be needed. The council supports the undertaking that the outline Archaeological Mitigation Strategy (oAMS) covers the lifetime of the scheme, including decommissioning, and that its implementation will be overseen by an Archaeological Clerk of Works. The council welcomes	In relation to the Roman Town scheduled monument, the Applicant has provided comment on this point with reference to CCC-RR-02 and CCC-RR-03 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**. The Applicant notes that Historic England have confirmed it is satisfied with the Applicant's approach, subject to minor points of clarification set out in their written representation **[REP1-079]**. In relation to the trial trenching reports, the Applicant has provided response with reference to CCC-RR-04 **[REP1-055]**. In relation to the use of no-dig solutions such as concrete blocks, the Applicant has provided response with reference to CCC-RR-05 **[REP1-055]**.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
			proposals to fund further work into archaeological assets.	
CCC-WR-03	4.1	Ecology and Nature Conservation	The proposed scheme will retain all woodland and the majority of hedgerows in Cambridgeshire (only 24m hedgerow will be lost). It will also result in additional woodland, hedgerow, species-rich grassland and enhancement of watercourses. However, confirmation that other notable habitats will be retained and incorporated into the landscape design is yet to be agreed some opportunities to maximise biodiversity value have been missed.	The Applicant notes this comment and will continue consulting with the Council.
CCC-WR-04	4.2	Ecology and Nature Conservation	The council is concerned that the EA is based on incomplete ecological survey work (including habitat / flora, bat, water vole, great crested newt, wintering birds) and it is not always possible to determine ecological baseline for Cambridgeshire. There is a lack of clarity and contradictions on the drawings / documents or missing information. Some ecological receptors have not been identified or sufficiently considered, including those for Huntingdon Woods Ancient Woodland / County Wildlife Site, watercourses and protected species (e.g. lighting and water pollution).	The ecological survey effort completed is considered proportionate to the predicted impacts and in line with best practice guidance, assuming a reasonable worst case scenario where surveys could not be completed. Design buffers have been incorporated to safeguard the majority of habitats with suitability for otter and water vole. Targeted water vole and otter surveys have been completed at sites of potential impact. Further, suitable protection measures are included within the **oCEMP [REP1-032]** including pre-construction surveys of suitable aquatic and terrestrial habitats. All ponds within the Site have been subject to survey during 2025. Access was not available to third party land outside of the Site. Great crested newt were identified in some ponds, and a draft license application has been submitted to Natural England. Additional reasonable avoidance measures have been included within the **oCEMP [REP1-032]** to safeguard amphibians.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
				Impact on bats have been minimised through avoidance of suitable habitat features. Outline reasonable avoidance measures have been added to the **oCEMP [REP1-032]** to safeguard bats. Wintering bird surveys have been completed covering November 2021 to March 2022 and also November 2023 to March 2024. While October was not surveyed, it is considered that adequate baseline information has been gathered to assess the importance of the Site to wintering birds given the absence of any internationally important designated site for nature conservation with non-breeding bird qualifying features. The **oCEMP [REP1-032]** includes measures to reduce light spill (4.1.26 to 4.1.29 and Table 5.3) and pollution prevention measures. It is not expected that Huntingdonshire Wood would be subject to any hydrological impacts.
CCC-WR-05	4.3	Ecology and Nature Conservation	The proposed biodiversity mitigation / compensation has not been adequately incorporated into other submission documents and insufficient evidence has been provided to demonstrate that protected species licence(s) can be obtained.	The mitigation measures are delivered through the framework of environmental management plans supporting the application, including the **oCEMP [REP1-032]** and **oLEMP [REP1-040]**. Biodiversity net gain measures have now been secured by a commitment in the **oLEMP [REP1-040]**. The Applicant has submitted a draft licence application to Natural England in February 2026 to gain a 'letter of no impediment', as confirmed by Natural England Written Representation **[REP1-081]** received at Deadline 1. The Applicant has now received the 'Letter of No Impediment' in relation to great crested newts, and submitted it into the examination.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-06	4.4	Ecology and Nature Conservation	The council is concerned that the scheme will have an adverse impact on ground nesting birds of open countryside, including skylarks (population of county importance) and lapwing, by removing nesting habitat.	**ES Vol 1 Chapter 7 [APP-043]** assesses the impact of the Scheme on ground nesting birds and the breeding bird assemblage as a whole, concluding a non-significant minor adverse effect on ground nesting birds but a significant moderate beneficial effect on the breeding bird assemblage as a whole. This is supported by recent research from the RSPB and Cambridge University[1] indicating that well managed solar farms contained a greater bird abundance and species richness compared to arable farmland. An outline Farmland Bird Mitigation Strategy (oFBMS) has been prepared as an appendix to the **Outline Landscape Ecological Management Plan [REP1-040]** providing further information in relation to proposed mitigation in relation to farmland birds, including ground nesting species.
CCC-WR-07	4.5	Ecology and Nature Conservation	The assessment of biodiversity net gain (BNG) is not accurate given the incomplete baseline surveys, lack of habitat condition assessments, exclusion of some post development habitats, and does not adequately reflect the temporary nature of the project. Watercourse BNG units needs to deliver minimum 10% net gain which is not demonstrated in the application.	The Applicant disagrees with this comment. The biodiversity net gain calculations have been undertaken following best practice, even where the requirement for BNG is not mandatory in respect of this application. Where access was not possible assumptions have been made based on aerial imagery and professional judgement. Condition assessments have been undertaken across all surveyed habitats. As specified within the Biodiversity Net Gain Metric spreadsheet Tab C-3 User Comments provided as Appendix A to the **Biodiversity Net Gain Report**

[1] *Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. Bird Study, 72(3), 217–222. https://doi.org/10.1080/00063657.2025.2450392*

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
				[REP1-052] enhancements to the tributary of the river Kym (within Site C) will be delivered through a reduction in riparian encroachment from Major/Major due to agricultural practices on land within 10m of the watercourse to No encroachment/ No encroachment due to proposed landscaping including species diverse grassland and native species woodland. This is in accordance with Table 13 of the Statutory Biodiversity Metric User Guide, which the Applicant has followed even though the requirement for BNG is not mandatory in relation to this application. The **oLEMP [APP-159]** covers management of habitats throughout the lifetime of the Scheme. Biodiversity net gain requires significant on-site gains to be secured for 30 years, and as such the Scheme goes beyond minimum requirements. The minimum time period required for biodiversity net gain has been met and the calculation outputs are considered valid.
CCC-WR-08	4.6	Ecology and Nature Conservation	Post development habitats (e.g. watercourse enhancement to River Kym tributary) and some opportunities to maximise biodiversity value need to be included in the Outline Landscape and Ecological Management Plan [APP-159]. The council also seeks further discussions about the proposed planting etc. to ensure it is appropriate to Cambridgeshire and the council.	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 in the **oLEMP [REP1-040]**. In relation to planting, the Applicant has responded to a similar point made by BBC at reference BBC-RR-62 in Table 1 of the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-09	4.7	Ecology and Nature Conservation	The council welcomes the establishment of a Steering Group to oversee the implementation of the Landscape and Ecological Management Plan (LEMP).	The Applicant notes this comment.
CCC-WR-10	5.1	Hydrology and Flood Risk	The approach to the drainage strategy is supported in principle, however, insufficient information has been provided to demonstrate that the proposals will not increase flood risk elsewhere. Hydraulic calculations and drainage layouts are asked to be shared before the LLFA is able to confirm the proposals are acceptable with respect to surface water drainage and flood risk.	The following items demonstrate the feasibility of the drainage strategy within the **outline Surface Water Management Plan [REP1-046]**, which provides the outline measures through which flood risk would not be increased off-site: • Outline Drainage Plan (Figure 3 - WHS1967-T01-0003_r6), showing the proposed location and footprint of the attenuation lagoon, the primary collection routes from the BESS and substation compounds, and the final discharge point to the local watercourse. • Preliminary Hydraulic Calculations: While a drainage model is typical for detailed design, the attenuation volumes presented in Table 3 (paragraph 6.4.3 **[REP1-046]**) were derived using Causeway Flow simulation software. These calculations account for the 1.0% AEP + 40%* Climate Change event and restrict discharge to the calculated greenfield runoff rates (Table 2 in paragraph 6.3.2 **[REP1-046]**). More detailed modelling and calculations would be provided for approval at detailed design. A **Hydraulic Modelling Report [REP1-067]** has also been submitted at Deadline 1.
CCC-WR-11	5.2	Hydrology and Flood Risk	The council supports culverting being avoided where possible.	The Applicant notes this comment.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-12	11.1	Traffic and Transport	The council, in its role as Local Highway Authority (LHA), seeks that all works within the adopted public highway are agreed with the applicant with appropriate approval and monitoring of works. Protective provisions for the LHA are sought to be included in the DCO.	The Applicant recognises 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 proposed 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 relevant management plans, and provide sufficient protection to the local highway authority, therefore, strictly speaking additional protective provisions or a separate agreement are not necessary as works will only be carried out, according to the **draft DCO [REP1-005]** with the consent of the relevant highway or street authority. However, the Applicant will continue to engage with CCC to understand whether additional protection may be required and whether there is a need for protective provisions for the benefit of CCC as Local Highway Authority.
CCC-WR-13	11.2	Traffic and Transport	The applicant should use the Design Manual for Roads and Bridges (DMRB) when assessing accesses and the council asks for raw data to be shared so to review each access. Temporary Traffic Regulation Orders need to be agreed with the councils Street Works department.	In relation to accesses, the **oCTMP [REP1-034]** now includes a series of drawings, in Appendix D, showing the site access drawings and the associated temporary speed limit and traffic management measures that are set out in Article 17 and described in detail in Schedule 8 of the draft DCO [REP1-005]. Article 17 sets out that where these powers are exercised beyond the detail provided in Schedule 8 of the **draft DCO [REP1-005]**, the Applicant must consult

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
				with the chief officer of police for the area and obtain written consent of the traffic authority. Junction visibility splays are indicated that correspond to either the posted speed limit or observed design speeds, and the reduced temporary speed limits that are proposed at the majority of the site accesses. The Applicant has shared the raw survey data (which is a spreadsheet format) with CCC for review on 11th March 2026. The exact detail of the proposed traffic management will be discussed and agreed with CCC's Street Works Department in advance of construction commencing, as set out in Section 5.5 of the **oCTMP [REP1-034]**.
CCC-WR-14	11.3	Traffic and Transport	Fully dimensioned plans of each access including all relevant dimensions, widths and radii, along with tracking showing two-way (simultaneous) movements of the largest vehicles which will use them. Tracking movement from accesses along the highway to ensure the highway is of sufficient nature to cater for the two way movements of construction vehicles is also requested.	Outline junction design drawings, including junction dimensions and updated vehicle tracking and visibility splays have been provided, as an appendix to the **oCTMP [REP1-034]**.
CCC-WR-15	11.4	Traffic and Transport	Temporary weight restriction suspension in the council's view would not be required as a weight restriction allows access to a property or development for access. Temporarily removing this weight restriction would open the area to non-construction related heavy vehicles allowing them to use the surrounding roads which the council would not support.	The Applicant notes this comment. The proposed temporary suspension of the weight restriction has been removed from the **Traffic Regulation Measures Plan [REP1-004]**, as requested by CCC.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-16	11.5	Traffic and Transport	There are no significant concerns in respect of the volume of traffic during the construction period with peak hours avoided. However, 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). More certainty as to the monitoring and enforcement of the routing is needed.	The **outline Construction Traffic Management Plan [REP1-034]** includes a plan (Appendix C) illustrating the proposed access route for HGVs to and around the Site. Section 9.1 of the oCTMP identifies that investigations are ongoing into the feasibility and potential to introduce either an automatic number plate recognition (ANPR) system or a GPS-based geofencing system to help monitor and enforce the prescribed HGV delivery routes. CCC, as well as Bedford Borough Council and National Highways, will be kept appraised of these investigations. The oCTMP also identifies that monitoring activities and responsibilities will be agreed with the LHAs and National Highways and set out within the final CTMP.
CCC-WR-17	11.6	Traffic and Transport	To avoid haulage traffic through a residential area it is suggested any vehicles travelling southbound on the A1 to access the B645 would continue southwards to the Wyboston junction and then return northwards to the A645 junction.	The Applicant notes this comment. The suggested restriction on HGV routing has been incorporated into the proposed Construction Access Strategy described in Section 5.1 of the **oCTMP [REP1-034]**.
CCC-WR-18	11.7	Traffic and Transport	The staff occupancy is proposed to be 2 persons per car is welcome 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.	The Applicant notes that the car sharing ratio is ambitious and is a challenging target but has been set deliberately in accordance with the government's decide and provide (or vision led approach) advocated in the NPPF. An **outline Construction Workers Travel Plan** has been prepared as an appendix to the **outline Construction Traffic Management Plan [REP1-034]**.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-19	11.8	Traffic and Transport	There are no new permissive pathways in Cambridgeshire and no defined improvements to existing PROW as part the application. There are significant visual impacts for users of PROW. The council requests that the applicant proposes new permissive paths to connect communities and connect existing PROW networks including enabling a wider network of routes for cyclists and equestrians.	The Applicant notes that new permissive access is proposed in Site C within Cambridgeshire. This has been clarified in Table 2 of Section 5.3 of the **oLEMP [REP1-040]**. The Applicant is proposing a circular permissive footpath within the fields in the north of Site C as shown on Figure 3 at Appendix A of the **oLEMP [REP1-040]**.
CCC-WR-20	11.9	Traffic and Transport	The council requests that the applicant seeks alternatives to using PROW for permanent vehicular access.	The Applicant has responded to this point with reference to CCC-RR-53 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
CCC-WR-21	11.10	Traffic and Transport	The council requests that reference in the DCO which allows unspecified changes to public rights of way is removed.	There are a number of provisions in the **draft DCO [REP1-005]** that would allow changes to be made to streets / public rights of way (PRoW) outside of those listed in the Schedules to the draft DCO. These powers are necessary in case there are unexpected issues at the point of implementation that necessitate further works / measures to be implemented to facilitate the authorised development. These powers cannot be exercised unilaterally by the Applicant and would require the Applicant to obtain the approval of the relevant authority in each case. For example, the main provisions are • Article 12(2) (power to alter layout, etc. of streets), which cannot be exercised without the consent of the street authority (see sub-paragraph 12(4));

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
				• Article 14(1)(c) (access to works), which cannot be exercised without the prior approval of the local planning authority in consultation with the relevant highway authority; and • Article 15(3) (temporary stopping up of streets and public rights of way), which cannot be exercised without the consent of the street authority, who may attach reasonable conditions to such consent (see sub-paragraph 15(4)(b). As such, CCC (and other authorities where relevant) will retain the ability to approve or refuse any works / measures that are not listed in the Schedules to the draft DCO. For these reasons it is considered that the powers sought in the draft DCO are well precedented, proportionate and appropriate. It is noted that similar powers have been included in many granted DCOs, including the Cambridge Waste Water Treatment Plant Relocation Order 2025.
CCC-WR-22	12.1	Noise and Vibration	As it relates to public rights of way equestrian users it is requested that any inverter buildings near public rights of way be constructed to minimise transfer of sound so that horses are not unsettled by any noise that this equipment may cause.	The Applicant notes with reference to HDC-RR-38 in Table 2 of the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]** that HDC consider (with regard the noise assessment) the methodology and baseline data are considered acceptable, and proposed limits set out are agreed. An assessment of noise impacts on public rights of way users is included within Section 10.8 of **ES Vol 1 Chapter 10 Noise and Vibration [APP-046]**, including at paragraph 10.8.54 for the operational phase which confirms no significant effects.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
CCC-WR-23	13.1	Land and Soils	The applicant needs to evidence the economic impact associated with the agricultural industry and the scheme's impact on agricultural production in the area.	The Applicant has responded to this point with reference to CCC-RR-60 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
CCC-WR-24	13.2	Land and Soils	The Outline Decommissioning Environmental Management Plan (oDEMP) 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 should be removed. A record of that left in situ should be shared with the Minerals and Waste Planning Authorities.	The Applicant has responded to this point with reference to BBC-RR-90 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
CCC-WR-25	14.1-14.2	Socio Economics, Land Use and Tourism	Clear apprenticeship and skills acquisition opportunities for local people included in the Outline Skills Supply Chain and Employment Plan [APP-163]. The applicant is advised to liaise with the Community Safety Partnerships to mitigate unintended consequences of the project on local communities.	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.
CCC-WR-26	15.1	Climate Change	Assurance that measures to minimise Greenhouse Gas (GHG) by embedded mitigation and enhancement do get implemented is required.	Embedded mitigation measures identified in paragraph 15.7 of **ES Vol 1 Chapter 15 Climate Change [APP-051]** have been incorporated into the outline construction, operational and decommissioning

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
				environmental management plans (**oCEMP [REP1-032]**, **oOEMP [REP1-036]**, and **oDEMP [REP1-038]**). The management plans are secured by the DCO so compliance with them is a legal requirement, and noncompliance would be enforceable by the Local Planning Authorities. The additional mitigation measures in paragraph 15.9.2 of **ES Vol 1 Chapter 15 Climate Change [APP-051]** are in relation to reducing upstream embodied emissions and on-site construction emissions. These additional mitigation measures are also within Section 5 of the **oCEMP [REP1-032]**.
CCC-WR-27	15.2	Climate Change	More detail is needed to the approach to be taken should peat be found, and a commitment to re-calculation of the scheme's carbon benefit should be made.	The Applicant has responded to this point with reference to CCC-RR-69 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
CCC-WR-28	15.3	Climate Change	Climate Resilience should be kept under review through the lifespan of the project, should climate risks emerge or become more acute than is currently modelled.	The Applicant notes this comment.
CCC-WR-29	16.1-16.2	Health	The council welcomes the assessment of the project's impacts on the established 'wider determinants of health' found in [APP-052]. Two health pathways should be considered further, the opportunity to deliver green corridors with Public Right of Way's (PROW) to diver open space leisure and play, and the management of the BESS site in terms of community safety.	The Applicant has responded to this point with reference to CCC-RR-73 and CCC-RR-74 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.

Our Ref.	CCC Ref.	Theme	CCC Comments	Applicant Response
			It is essential to safeguard against potential health inequalities and keep all stakeholders accountable to approved standards of practice.	
CCC-WR-30	17.1	Cumulative and In Combination Effects	The council considers the cumulative visual impact of this scheme in conjunction with existing and planned solar schemes in the local area, particularly near to site D to be a key concern. The council refers to Huntingdonshire's Relevant Representation that questions the conclusion by the applicant of there being a non-significant effect on Huntingdonshire Local Character Area (LCA).	The Applicant has responded to this point with reference to CCC-RR-86 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
CCC-WR-31	18.1	The Scheme	The council would like at scale replacement of PV panels and batteries to be recognised as a distinct phase separate to operation. Appropriate assessment of traffic, and the impact on biodiversity, noise, air quality, employment and socio economic matters will need to be made and shared with the local planning authorities for approval ahead of works starting to ensure appropriate mitigations are in place.	The assessment of 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 a consolidated summary of these works, the assessed environmental effects in the ES, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.

3.0 RESPONSES TO WRITTEN REPRESENTATIONS – STATUTORY ENVIRONMENTAL BODIES

3.1 Response to Historic England

Table 3: Response to Historic England Written Representation (REP1-079)

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-01	2.7-2.10	Cultural Heritage and Archaeology	Church St Mary The Virgin (NHLE 1114778, listed grade I) St Mary's is medieval parish church in Keysoe dating from the late C12th-C15th built in coursed limestone rubble with ashlar dressings, described by Pevsner as being "very much in the Huntingdonshire style" and incorporates features of both the Decorated and Perpendicular Gothic. Its recessed octagonal spire makes it a prominent landmark building which is readily visible and recognisable in views from the surrounding roads and fields. Part of significance of the church lies in its setting which is mostly undeveloped open countryside and land in agricultural use. The church is a prominent focal point in views to the roads and fields to the north, and there are also long views out from the churchyard across the open countryside. The rural setting therefore enhances the way in which the building is experienced and appreciated.	The Applicant notes and welcomes that HE is in agreement with the assessment of minor or *'not significant'* operational phase effects upon the Church St Mary The Virgin Assets as is summarised in paragraph 6.8.62 of **ES Chapter 6 [APP-042]**.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			The proposed development site lies to the north-east of the church and within its setting. Although the church is generally well-contained within a churchyard surrounded by mature vegetation (as illustrated by viewpoint 29) there is some intervisibility between the two. The spire is particularly prominent. We consider that some south westerly views towards the church are likely to be affected by the presence of the solar farm to some degree (as illustrated by viewpoint 33). The long views from the eastern extreme of the churchyard will also be impacted. We consider that the change to the wider setting of the grade I listed church would erode its historic rural setting and would therefore affects its significance to a minor degree.	
HE-WR-02	2.11-2.15		Church of All Saints (NHLE 1114812, listed grade I) The medieval parish church in Little Staughton is largely C15th with some C13th and C14th fabric and early C20th work. It is built of coursed limestone with ashlar dressings. Its octagonal spire makes it particularly eye-catching and this in combination with its elevated position up on the ridge make it standout as a distinctive key building within the rural landscape. Part of significance of the church lies in its setting which is mostly undeveloped open countryside and land in agricultural use. The church is a prominent focal point in views the roads and fields to the north, and there are views out from the north side of the churchyard across the open countryside. The rural setting therefore enhances the way in which the	The Applicant acknowledges that HE 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 Chapter 6 [APP-042]**. The Applicant notes HE's 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 [APP-083]**. The Applicant acknowledges and agrees with HE that solar panels would be introduced in to views from *'the*

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			building is experienced and appreciated and speaks to its significance as a rural parish church - a key building within the historic settlement. The development site lies to the north of the church and within its setting. There is good intervisibility between the two. Viewpoints 51-53 provides some indication of the visual effect of the church in context with the solar farm to the north, which will likely affect views from: the northern side of the churchyard, western and eastern approaches to the church, and from the north (on Great Staughton Road and the public right of way beside the farm) towards the church and ridgeline. We note that hedging is proposed to screen the solar farm and whilst we accept that this may help to mitigate negative visual impacts to some extent, we remain sceptical that it will be effective in the case of All Saints Church, due to its elevated position. The solar farm would sprawl across the open fields and read as an alien feature that would detract from the experience and appreciation of the church in its historic rural context. We consider that the presence of the solar farm within the setting of the grade I listed building would cause degree of harm to its significance which would be moderate within less than substantial harm. In EIA terms the effect would be moderate.	*northern side of the churchyard, western and eastern approaches to the church, and from the north (on Great Staughton Road and the public right of way beside the farm) towards the church and ridgeline'.* The Applicant has acknowledged that views of solar development within the easternmost parts of Site B 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 [APP-083]**, 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 HE's position in relation to the visibility of the solar panels within the eastern part of Site B from public right of ways in close proximity to the church and the 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 the **Design Approach Document [APP-034]** which was utilised to further refine the assessment of 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

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
				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 would not compete with the prominence of All Saints church as the most significant feature. The Applicant agrees with HE's comments that the proposed hedgerow planting within the Scheme would have little mitigating effect in relation to visual impacts upon All Saints Church, due to its elevated position. 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

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
				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 northern part of Site B) in these views is 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 outwards from the churchyard, therefore, make a lesser contribution to the church's overall cultural significance. The Applicant maintains 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*

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
				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]**. 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 Chapter 6 of the ES [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 would be materially affected. The Applicant would also highlight that despite the difference in professional opinion above, HE's position in relation to the assessment of *'less than substantial harm'* is very similar to the Applicant's. Where HE have suggested that the Scheme would result in '*less than substantial harm'* at a moderate level 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 **Chapter 6 of the ES [APP-042]**.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-03	2.16-2.18	Cultural Heritage and Archaeology	'The Old Manor House, Cretingsbury: a motte castle and moated manor house' (NHLE 1009590, scheduled monument) The site at the Old Manor House consists of a well-preserved earthwork of a motte castle and a manorial moat. Both classes of monument belong to a medieval period. The monument represents a relatively rare example of incorporation of an earlier castle earthwork into a later moated site indication long continuity of use. In this particular case the moat is of a particularly complex form displaying a wide diversity of features. The monument is positioned on a ridge overlooking the valleys of River Kym to the north and a small brook to the south. Its elevated position, which affords long views over predominantly agricultural land contributes positively to our understanding of the character of the site and its function. We note the applicant has considered the impact of the development on this scheduled monument and identified that there will be adverse effects on the significance of the heritage asset resulting from changes within its setting. The magnitude of the effect in EIA terms was described as temporary moderate adverse effect during construction, and a permanent minor adverse effect in operational phase. We would agree with the applicant's conclusion in this case. We consider that due to the distance and the partial screening, the harm would be at the lower end of less that substantial harm in NPPF terms.	The Applicant notes and welcomes that HE is in agreement with the assessment of effects upon the Old Manor House, Cretingsbury: a motte castle and moated manor house scheduled monument.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-04	2.19-2.21	Cultural Heritage and Archaeology	Great Staughton Conservation Area The Great Staughton Conservation Area comprises the area to the north and south of The Highway. It encompasses predominantly residential properties but also includes the church, public houses and farm buildings reflecting Great Staughton's heritage as a coaching location. The rich and varied set of buildings include the church of St Andrew (listed grade I) and Place House -a Tudor mansion house listed grade II*. Various grade II listed buildings are also present. There are long southerly and south-easterly views out from the edges of the conservation area across the open agricultural landscape which are characteristic of its essential setting and speak to its significance as small historic settlement set within a wider agricultural hinterland. We agree with the applicant's assessment that much of the conservation area and the listed buildings within it are unlikely to be affected in terms of their setting. There are however some long views out from the parts of the conservation area including the from south-eastern corner of the churchyard and glimpsed views south and east from the southern end of the Town towards the solar farm which would lie within a kilometre of the conservation area boundary. We consider that the experience of the conservation area would be negatively affected to some degree due to the visual impacts we have described above.	The Applicant notes and welcomes HE's agreement that *'much of the conservation area and the listed buildings within it are unlikely to be affected in terms of their setting'.* The Applicant also notes and agrees with HE's position that longer range views out of the southeastern part of the churchyard, and southern part of the town, would likely negatively affect the experience of the conservation area. The Applicant would highlight that minor or '*not significant'* operational phase effects have been assessed upon the character of the Great Staughton Conservation Area (Asset 164) as well as upon the settings of the grade I listed Church of St Andrew (Asset 534) and the grade II listed the Manor (Asset 526) and its associated gatepiers (Listing Number 1214656) and non-designated parkland (Asset 648) as is summarised in paragraph 6.8.62 of **ES Chapter 6 [APP-042]**.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-05	2.22-2.26	Cultural Heritage and Archaeology	Two bowl barrows 900m and 1000m east of Old Manor Farm (NHLE 1020486, scheduled monument) The monument includes two mounds which were interpreted as prehistoric bowl barrows. Both are represented by slight earthworks much reduced in height by past ploughing. The barrows are positioned on a ridge overlooking the valleys of River Kym to the north and a small brook to the south. There is cartographic evidence that additional barrows were also present in this area, however they are no longer extant. The barrows are a class of funerary monument which was mainly constructed in the Bronze Age. However, the site to the east of Old Manor Farm have not been excavated so far and the dating remains unconfirmed. Roman period barrows are known from several sites in Cambridgeshire, and it cannot be ruled out that the site had some association with Roman town located in short distance to the north. Even if we assume that the barrows pre-date the roman activity, they must have still been prominent markers in the landscape at that time. The setting of the barrows is defined by open fields stretching from the crest of the ridge down to the bottom of the river valley, with only a couple of small blocks of woodland. The openness of the landscape contributes positively to the understanding, and consequently to the significance of this heritage asset. The applicant has considered the significance of the monument in the Cultural Heritage chapter of the	The Applicant acknowledges that HE disagrees with the construction phase and operational phase assessments of minor effects upon the setting of the Two bowl barrows 900m and 1000m east of Old Manor Farm scheduled monument (Asset 13), which in the Applicant's professional opinion would not be significant in EIA terms, as summarised in paragraph 6.8.62 of **ES Chapter 6 [APP-042]**. The Applicant acknowledges HE's position regarding the contribution that setting makes to the asset's significance is largely related to the barrows position along the ridge overlooking the River Kym to the north and a brook to the south, their inter-relationship with other nearby Roman scheduled monuments and the suggestion that that the openness of the landscape contributes positively to the understanding, and consequently to the significance of this heritage asset. The Applicant maintains its assessment that *'at the time of their construction their siting along the high ridge and the visibility of the monuments would have been of great importance, the importance of these barrows wider setting and inter-relationships has been reduced by their relatively poor survival as standing earthwork features, which means that they are not currently experienced in the landscape'* and, therefore, had assigned them as having a Medium relative sensitivity to changes to their setting during the assessment as shown on page 56 of **ES Vol 2, Appendix 6-4: Settings Impact Assessment [APP-083]**.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			Environmental Statement (ES), including contribution made by its setting. We note that the setting assessment also looked into inter-relationship of the barrows and the Roman town. The ES concluded that the magnitude of the effect in EIA terms would be minor for the construction and operational phases of the project. We believe this assessment slightly underplays the severity of the impact. We welcome commitment to provision of a buffer to the north of the barrows and positioning of the solar panels on a lower ground. This is correct measure to minimise visual impacts in this case. However, as described in the Environmental Statement - Vol 2 Appendix 5-4 Effects at Viewpoints [APP-072], viewpoint 57, the solar arrays would still be evident at close distance. We consider that the presence of the solar farm within the setting of the barrows would cause degree of harm to their significance which would be moderate within less than substantial harm (in terms of NPPF). In EIA terms the effect would be moderate adverse.	The Applicant broadly agrees with HE's comments that, despite the proposed buffer, solar panels would still be evident at a close distance from the scheduled monument but would maintain their assessment of a Low impact upon their setting as none of the inter-related features in the area *'are distinctive in the landscape (largely due to arable land use ploughing them flat)'* and that *'the extent of the development would not extend right up to the ridge line that the barrow mounds are situated upon'* as shown on pages 56 and 57 of **ES Vol 2, Appendix 6-4: Settings Impact Assessment [APP-083]**. The Applicant notes that the disagreement outlined above with regard to the assessment of impacts upon the setting of the Two bowl barrows 900m and 1000m east of Old Manor Farm scheduled monument (Asset 13), is based upon a differing professional opinion in relation to the contribution that northward views from the barrows make to their overall cultural significance. The visibility of parts of the Scheme (largely limited to solar development within the southern part of Site C) in these views is not disputed by the Applicant. The Applicant maintains their assessment of a low impact during the operational phase upon the setting of the barrows, 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 **Chapter 6 of the ES [APP-042]**. The Applicant would highlight that a medium impact (which

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
				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 Chapter 6 of the ES [APP-042]. The Applicant does not believe that the key characteristics of the barrows setting (which are considered by the Applicant to be its prominent position along the ridgeline and intervisibility with the Roman Town, despite neither being prominent in the landscape) would be eroded as the development has been designed not to project above the horizon in views between these assets. The Applicant would also highlight that despite the difference in professional opinion above, HE's position in relation to the assessment of *'less than substantial harm'* is very similar to the Applicant's. Where HE have suggested that the Scheme would result in '*less than substantial harm'* at a moderate level 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 **Chapter 6 of the ES [APP-042]**.
HE-WR-06	2.27-2.31	Cultural Heritage and Archaeology	Roman Small Town south of Great Staughton (NHLE 1491190, scheduled monument)	The Applicant welcomes HE's comment on this matter.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			The monument comprises extensive area of Roman activity represented by series of complex cropmarks located immediately to the south of River Kym. The site has been interpreted as buried remains of a small Roman town. While the presence of archaeological remains in the area has been known for some time, the full significance and complexity of the site has been only identified during early archaeological investigations associated with the project. Recognising the national significance of the site, the applicant applied to include this site on the National Heritage List for England. Subsequently the site was designated as a scheduled monument in September 2024. The settlement appears to focus on a central open area with numerous double ditched trackways radiating from the open space. The trackways lead in various directions linking with other tracks to form a network of roads. Between the roads, multiple enclosures organised in a structured manner, demonstrate organisation and spatial order to the settlement plan. Linear stretches of settlement are clearly visible along the roads leading away from the central part of the town. Industrial and quarrying areas are thought to be present on the edges of the settlement. The setting of the monument is defined by its location within the River Kym valley. The relationship with the river, relative openness of the predominantly agricultural landscape punctuated by small blocks of woodland, and views towards the ridge defining the valley all contribute positively to the site's significance.	

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			The applicant has considered the significance of the monument in the Cultural Heritage chapter of the Environmental Statement (ES), including contribution made by its setting. We are aware that the scheme was modified to avoid direct impacts on buried archaeology in the designated area and to minimise the impact on the setting by maintaining visual connectivity with the ridge to the south and provision of a vegetation screening. We welcome these measures to mitigate impact by design and consider that they are appropriate in this case.	
HE-WR-07	2.32	Cultural Heritage and Archaeology	Despite embedded mitigation measures the scheme will still result in a change to the setting of the designated heritage asset. Presence of the solar arrays will alter the character of the area directly to the south of the Roman town. While the proposed vegetation buffer will partially screen direct views, it will also reduce the openness of the landscape.	The Applicant notes and agrees with HE comments.
HE-WR-08	2.33	Cultural Heritage and Archaeology	The Cultural Chapter of the Environmental Statement (Vol 2 Appendix 6-4 Settings Impact Assessment [APP-083] concluded that the magnitude of the effect in EIA terms would be moderate for the construction and minor for the operational phase of the project. We broadly agree with this conclusion and consider that the implementation of the Project would cause degree of harm to the monument's significance. The level of harm would be within less than substantial range in NPPF terms - moderate during construction, and low to moderate afterwards.	The Applicant notes and welcomes that HE is in agreement with the Applicant's assessment of effects upon the Roman small town south of Great Staughton scheduled monument.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-09	2.34	Cultural Heritage and Archaeology	We are satisfied that the proposed mitigation measures are adequate to prevent direct impacts on the significance of the scheduled monument during construction and operation phases of the Project. We have provided additional comments (in section 3) on the methodology of the decommissioning phase aimed at prevention of the unforeseen adverse impacts.	The Applicant notes and welcomes HE's comment that the proposed mitigation measures are adequate to prevent direct impacts on the significance of the scheduled monument during construction and operation phases of the Scheme.
HE-WR-10	2.35	Cultural Heritage and Archaeology	We welcome the proposed enhancement measures outlined in the application (Outline Heritage Enhancement Strategy [APP-167]) which would be beneficial for the conservation and long-term preservation of the monument. The measures would also improve public enjoyment and understanding of this nationally significant archaeological site. The measures include taking the area of the monument out of cultivation (and maintaining it under grass), enabling public access through creation of circular footpath, provision of on-site interpretation, commitment to funding further archaeological research. Among these measures, the permanent change to agricultural practice is of particular importance, as it would arrest gradual erosion caused by repeated ploughing of the fields. It would also protect the site to a certain extent from illegal metal detecting in the future. We consider that the measures proposed would deliver considerable heritage focused public benefit and enhance the significance of the heritage asset. This should be taken into account in the decision-making process as recommended by section 5.9.25 of the National Policy Statement for Energy (EN-1), 2024.	The Applicant notes and welcomes HE's comments regarding the proposed enhancement measures outlined in the application (Outline Heritage Enhancement Strategy [APP-167]), and that the Scheme will deliver '*considerable heritage focused public benefit*'.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-11	2.36-2.39	Cultural Heritage and Archaeology	Roman site, Rushey Farm (NHLE 1006866, scheduled monument) The monument mainly comprises buried remains of two buildings, interpreted as being part of a Roman villa. The buildings were excavated in the 1950s. The excavations have shown that the site likely includes an Iron Age farmstead, Roman villa and inhumation cemetery. The Rushey Farm site is located short distance to the south of the main area of Roman activity centred on the 'Roman Town south of Great Staughton'. It is likely that the villa was located along one of the roads radiating from the town and that there is a close association between the two sites. The setting of monument is defined by the predominantly arable fields, open landscape, and intervisibility with the Roman town located on a slightly lower ground in River Kym valley. All of these elements contribute positively to the experience of the site and its significance. We note the applicant has considered the impact of the development on this scheduled monument and identified that there will be adverse effects on the significance of the heritage asset resulting from changes within its setting. The magnitude of the effect in EIA terms was described as minor adverse effect in construction and operational phases. We would agree with the applicant's conclusion in this case. We consider that due to the distance, partial screening and retention of the main lines of view to the north the harm	The Applicant notes and welcomes that HE is in agreement with the Applicant's assessment of effects upon the Roman site, Rushey Farm scheduled monument.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			would be at the lower end of less that substantial harm in NPPF terms.	
HE-WR-12	3.2	Cultural Heritage and Archaeology	We note that a below ground cable corridor for 33kv and 400 kV connections will be installed either through open cut trench, horizontal drilling or through the use of horizontal direction drilling (HDD) (Table 2-17 & Table 2-20). If drilling techniques are to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains.	The Applicant has updated Table 5.2 of the **outline Construction Environmental Management Plan [as updated alongside this submission]** to set out appropriate mitigation and provide a Frac-Out Contingency Plan in relation to any HDD, and not just the HDD beneath the scheduled monument.
HE-WR-13	3.3	Cultural Heritage and Archaeology	Paragraph 2.5.39 states that the Areas of Archaeological Constraint have been identified in the outline Archaeological Mitigation Strategy. We welcome this approach; however, we would like to highlight that the list of these constraint areas will need to be updated following additional surveys undertaken post-consent.	The Applicant notes and welcomes HE's comment and can confirm that it is understood that the **outline Archaeological Mitigation Strategy [REP1-048]**, which includes the list and details of the AACs, will require update dependant on the results of further archaeological works, post-consent. 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 LPA in consultation with the county archaeologist and HE.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-14	3.4	Cultural Heritage and Archaeology	We welcome that the applicant made special provisions for works in the 'Areas of Archaeological Constraint' (works in paragraphs 2.4.18, 2.5.39-41) to achieve preservation of archaeology in situ or secure further archaeological investigation. We note that the Environmental Statement only contains general information regarding the works and the details of the permitted works in these areas are set out separately in the outline Archaeological Mitigation Strategy.	The Applicant notes and welcomes HE's comment.
HE-WR-15	3.5	Cultural Heritage and Archaeology	Historic England can confirm that we have previously expressed concerns about the heritage impact of the originally considered location of BESS and Project Substation within site C. We welcome the decision to move the location of these elements of the Project to site D as outlined in paragraphs 2.4.43 and 2.4.78.	The Applicant notes and welcomes HE's comment.
HE-WR-16	3.6	Cultural Heritage and Archaeology	We note that due to construction requirements the areas for BESS and Substation cannot be designated for preservation in situ of archaeological remains (paragraphs 2.4.73, 2.4.90).	The Applicant notes and welcomes HE's comment.
HE-WR-17	3.7	Cultural Heritage and Archaeology	We note that for Work No. 4 (200kv connection from East Park Substation to Eaton Socon Substation) Horizontal Directional Drilling) is identified as a method of construction in areas of archaeological constraint (paragraph 2.4.96). We welcome inclusion of this commitment, as it gives the project flexibility to address impacts on currently unknown archaeological remains. A mechanism for agreeing locations where horizontal directional drilling would be utilised for archaeological reasons should be specified in the application to allow	The Applicant notes and welcomes HE's comment. The mechanism for agreeing the locations for horizontal directional drilling that would be utilised for archaeological reasons will be through the LPA approval of the final Archaeological Mitigation Strategy in accordance with Requirement 15 of the **draft DCO [REP1-005]**. Agreement of these locations would be dependent on the results of further archaeological

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			for input from the Local Authorities and Historic England.	works and consultation with the Local Authorities and HE.
HE-WR-18	3.8	Cultural Heritage and Archaeology	We note that the area of scheduled monument 'Roman Small Town south of Great Staughton' is covered by Work Nos. 6 and 8. These are works for internal cabling and ancillary infrastructure (No. 6); and works to create, enhance and maintain green infrastructure (No. 8). A number of provisions contained within these works' packages would be inappropriate within scheduled area (such as tree planting, creation of swales, etc.) and the proposals for the designated area are detailed separately in the Outline Landscape and Ecological Management Plan [APP-159], Outline Archaeological Mitigation Strategy [APP-166], and Outline Heritage Enhancement Strategy [APP-167]. These must be clearly cross-referenced to avoid any confusion and unintentional harm to the significance of the designated heritage asset.	The Applicant has updated paragraph 7.3.20 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to more clearly define the specific works that are authorised in relation to the Scheduled Monument.
HE-WR-19	3.9	Cultural Heritage and Archaeology	We understand that in the area of the scheduled monument the consent would be granted only for the following works: construction, use and removal of temporary access track; construction, maintenance and removal of the 33kv electric cable (installed through HDD method); creation of wildflower meadow, creation of permissive footpath, and installation of on-site interpretation.	The Applicant has updated paragraph 7.3.20 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to more clearly define the specific works that are authorised in relation to the Scheduled Monument.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-20	3.10	Cultural Heritage and Archaeology	We recognise that it might not be practical or necessary to define a completely separate works package for the scheduled monument area. However, as the application seeks to obtain consent for the works which would normally require Scheduled Monument Consent (under provisions of 1979 Ancient Monuments and Archaeological Areas Act), we recommend that all works proposed within the boundaries of the scheduled monument should be clearly identified by the applicant in one document for the sake of clarity and to avoid misunderstandings in the future. The list of permitted works could be provided within one of the outline strategies which are certified in the DCO.	The Applicant has updated paragraph 7.3.20 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to more clearly define the specific works that are authorised in relation to the Scheduled Monument.
HE-WR-21	3.11	Cultural Heritage and Archaeology	We note references to the design of temporary access track in paragraph 2.4.132. We would like to highlight that these designs do not apply to the temporary access track within the boundaries of the scheduled monument. A separate design for this area has been agreed, and details are specified in an outline Archaeological Mitigation Strategy document [APP-166]. We would recommend that this commitment to a different design is appropriately cross-referenced for the avoidance of the doubt.	The Applicant has updated paragraph 2.4.133 in **ES Vol 2 Chapter 2 The Scheme [as updated alongside this submission]** to provide an appropriate cross reference, as requested. The Applicant has also updated Table 5.2 of the **outline Construction Environmental Management Plan [as updated alongside this submission]** to highlight that the temporary access track across the scheduled monument must be in accordance with the final Archaeological Mitigation Strategy.
HE-WR-22	3.12	Cultural Heritage and Archaeology	We welcome the commitment to consultation with Historic England over measures contained in CEMP (paragraph 2.5.31).	The Applicant notes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-23	3.13	Cultural Heritage and Archaeology	We note that intrusive archaeological works are listed as preliminary works which are to be undertaken before commencement of various phases of the construction of the scheme (paragraph 2.5.5). This is correct approach and we support this sequence of activities.	The Applicant notes and welcomes HE's comment.
HE-WR-24	3.14	Cultural Heritage and Archaeology	However, we note that some activities relevant to the scheduled monument - 'Roman Small Town south of Great Staughton', are not listed among primary stages of construction (as outlined in paragraph 2.5.4). Specifically, the timings of removal of temporary access track constructed across the monument and implementation of enhancement measures (taking the site out of cultivation) are not mentioned. These activities and expected timeframe of their implementation should be added to the construction programme for clarity and transparency.	The Applicant notes that paragraph 2.5.4 of **ES Vol 2 Chapter 2 The Scheme [APP-038]** is an indicative programme and presents a non-exhaustive list of activities. The same indicative programme is presented in the **outline Construction Environmental Management Plan (oCEMP) [REP1-032]** which will be adapted into a final programme as part of the final CEMP once a contractor is appointed. The Applicant has updated Table 5.2 of the **oCEMP [as updated alongside this submission]** to provide additional commitments in relation to the timing of taking the scheduled monument out of cultivation, and in relation to the timing of removal of the temporary access track. For completeness, these commitments have also been added to paragraphs 7.3.36 and 7.3.42 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]**.
HE-WR-25	3.15	Cultural Heritage and Archaeology	We consider that in the area of the scheduled monument – Roman town at Great Staughton, an appropriate security plan should include coverage of parts of the archaeological site by CCTV installed along the perimeter fence surrounding the solar arrays.	The Applicant notes HE's comment and considers this to be a matter that can be provided at detailed design.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			This measure is an opportunity to improve the site's security and prevent crime.	
HE-WR-26	3.17	Cultural Heritage and Archaeology	We note that a study area of 3 km radius together with a review of ZTV has been used to identify core baseline conditions for assessment of setting impacts on heritage assets (paragraph 6.4.3). We are satisfied that this is an appropriate assessment methodology and that all designated heritage assets which would experience negative effects have been correctly identified.	The Applicant notes and welcomes HE's comment.
HE-WR-27	3.18	Cultural Heritage and Archaeology	Historic England notes that certain areas of the draft Order Limits have not been accessible for geophysical survey prior to the submission of the DCO. These areas consist of one field within field B. We welcome applicant's commitment to undertake the survey as part of 'Site Preparation Works' (paragraph 6.5.5).	The Applicant notes and welcomes HE's comment.
HE-WR-28	3.19	Cultural Heritage and Archaeology	Historic England notes that certain areas of the draft Order Limits have not been accessible for archaeological trial trench evaluation prior to the submission of the DCO. This includes the cable corridors between East Park Site B to C, from East Park Site C to D, the grid connection route, two fields within Site B and one field within Site D. We welcome the commitment by the applicant to carry out a second phase of trial trench evaluation following the granting of the DCO, in these areas (paragraph 6.5.6). The	The Applicant notes and welcomes HE's comment. The Applicant notes that the evaluation trenching undertaken to date only represents the first phase of trenching and would highlight that paragraphs 5.3.1 and 5.3.2 of the **oAMS [REP1-048]** note that further stages of archaeological evaluation work would be completed. The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, which in the first instance would involve the

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			evaluation work should be undertaken as part of 'Site Preparation Works'.	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.
HE-WR-29	3.20	Cultural Heritage and Archaeology	As certain areas of the draft Order Limits have not been fully evaluated, there is still a possibility that previously unknown archaeological remains of high significance will be discovered. Any harm to such remains would need to be appropriately mitigated. This is a risk for the Project and the DCO needs to ensure there is a secure mechanism and process for dealing with and managing unexpected and high value archaeological discoveries through the draft AMS & WSI documents secured by the DCO requirement.	The Applicant notes HE's comment and can confirm that it is understood that the **outline Archaeological Mitigation Strategy [REP1-048]** will require multiple reviews alongside the Scheme design dependant on the results of further archaeological works and that 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 LPA in consultation with the county archaeologist and HE.
HE-WR-30	3.21	Cultural Heritage and Archaeology	Section 6.7 outlines the Embedded Mitigation and Enhancement Measures, which includes the implementation of design principles. We are pleased to see that known and unknown archaeology will be protected through archaeological investigation and mitigation (Principle 3.2, Section 6.7.4).	The Applicant notes and welcomes HE's comment.
HE-WR-31	3.22	Cultural Heritage and Archaeology	The Illustrative Environmental Masterplan outlines the proposed planting strategy. It should be noted that the type of plants selected needs to be carefully considered in terms of the impacts that the root systems may have on buried archaeological remains. For example, the report prepared by Oxford	The Applicant notes this comment and has updated paragraphs 5.3.5, 5.3.13 and 5.3.20 of the **outline Landscape and Ecological Management Plan [as updated alongside this submission]** to make

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			Archaeology (Assessing the Impact of Tree Roots on Archaeology) highlights the impact that the root structures of different types of trees could have on buried archaeological remains (see https://knowledge.oxfordarchaeology.com/library/12564).	reference to this guidance as part of plant species selection.
HE-WR-32	3.23-3.24	Cultural Heritage and Archaeology	Paragraph 6.7.16 states that no-dig solutions have been proposed for 29 out of 42 identified Areas of Archaeological Constraints (AACs). We welcome this approach to mitigation by design. We welcome commitment to revision of the identified Areas of Archaeological Constrain in agreement with relevant stakeholders, when final results of all surveys and all phases of trial trench evaluation are available (paragraphs 6.7.17 and 6.9.8). Historic England supports this approach.	The Applicant notes and welcomes HE's comment.
HE-WR-33	3.25	Cultural Heritage and Archaeology	The OCEMP includes commitments in relation to working around archaeological remains. We specifically note the commitments applicable to works within the scheduled monument – 'Roman small town to the south of Great Staughton' (Paragraph, 6.7.23-24). The measures include demarcation of the monument, exclusion of construction of activities with exception of HDD and construction of temporary access track, use specific methodology for HDD and construction of temporary access track. We support these commitments as they are necessary to prevent adverse impacts on the significance of the designated heritage asset.	The Applicant notes and welcomes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-34	3.26	Cultural Heritage and Archaeology	We note that the potential issues associated with a risk of bentonite slurry outbreak during HDD work beneath the scheduled Roman town have been considered in outline Archaeological Mitigation Strategy and Outline Construction Environmental Management Plan. We can confirm that the outlined control measures are appropriate in this case.	The Applicant notes and welcomes HE's comment.
HE-WR-35	3.27	Cultural Heritage and Archaeology	It is stated in Table 6.11 and Section 6.8.21 that the predicted direct effects within the Site B to Site C corridor are not significant in EIA terms. These conclusions are based on the evaluation work done to date, but it is noted that evaluation excavations have not been carried out (Section 6.8.22). We are pleased to see that the assessment of direct impacts will be revised following the completion of the Trial Trenching. The same comments apply for the Site C to Site D corridor (Section 6.8.32).	The Applicant notes HE's comment. 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 LPA in consultation with the county archaeologist and HE.
HE-WR-36	3.28	Cultural Heritage and Archaeology	It is noted that additional mitigation and monitoring will be required for areas that have not been accessible for geophysical survey prior to the submission of the DCO (Section 6.9.1). Geophysical surveys will be carried out, and where required, programmes of trial trench evaluation will be completed. This approach is sensible, as it will fill in the gaps in our understanding. If previously unknown archaeological remains are uncovered during this additional phase of evaluation, then an appropriate mitigation strategy would need to be implemented in consultation with (and with agreement of) the relevant stakeholders.	The Applicant notes HE's comment and notes that the evaluation trenching undertaken to date only represents the first phase of trenching and would highlight that paragraphs 5.3.1 and 5.3.2 of the **oAMS [REP1-048]** note that further stages of archaeological evaluation work should be completed. 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

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
				undertaken in line with archaeological brief jointly issued by CHET and BBHET. 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 LPA in consultation with the county archaeologist and HE.
HE-WR-37	3.29	Cultural Heritage and Archaeology	Volume 1 – Main Report Chapter 17: Cumulative and In-Combination Effects [APP- 053] Historic England considers that methodology of the assessment in adequate. We can confirm that the conclusions of the Applicant's assessment of cumulative effects, as set out at Table 17.5, are appropriate for the purposes of the DCO examination.	The Applicant notes and welcomes HE's comment.
HE-WR-38	3.30-3.34	Cultural Heritage and Archaeology	Vol 2 – Technical Appendices Appendix 6-4: Settings Impact Assessment [APP- 083] We can confirm that we were consulted by the applicant on the scope of the setting assessment and the methodology used for this assessment. We support the approach taken by the applicant. We note that a study area of 3 km radius together with a review of ZTV has been used to identify core baseline conditions for assessment of setting impacts on heritage assets (paragraph 1.1.1-2). We are satisfied that this is an appropriate assessment methodology and that all designated heritage assets	The Applicant notes and welcomes HE's comment that HE supports the approach, scope and methodology utilised for the setting assessment. The Applicant notes and welcomes that HE broadly agree with the results of the settings assessment and acknowledges that there are two areas of disagreement, namely in relation to the assessed levels of effect on the Church of All Saints (Asset 38) and the Two bowl barrows 900m and 1000m east of Old Manor Farm scheduled monument (Asset 13). The Applicant has provided responses to HE's more detailed comments (with reference to *HE-WR-02* and

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			which would experience negative effects have been correctly identified. We broadly agree with the results of the assessment presented in the Settings Impact Assessment document. However, in a couple of cases we consider that the level of impact on the designated heritage assets is higher than that identified by the applicant. In case of the grade I listed Church of All Saints (NHLE 1114812), the setting assessment concluded that the magnitude of the effect in EIA terms would be moderate for the construction and minor for the operational phase of the project. We consider that the presence of the solar farm within the setting of the church would cause a degree of harm to its significance which would be moderate within less than substantial harm (in NPPF terms) for construction and operational phases. In EIA terms the effect would be moderate adverse. In case of a scheduled monument 'Two bowl barrows 900m and 1000m east of Old Manor Farm' (NHLE 1020486) the setting assessment concluded that the magnitude of the effect in EIA terms would be minor for the construction and operational phases of the project. We consider that the presence of the solar farm within the setting of the barrows would cause degree of harm to their significance which would be moderate within less than substantial harm (in terms of NPPF) for construction and operational phases. In EIA terms the effect would be moderate adverse.	*HE-WR-05* in this table, above) in relation to these two assets above and, as such will not repeat them here.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-39	3.36-3.37	Cultural Heritage and Archaeology	Volume 2 – Technical Appendices Appendix 6-5: Archaeological Geophysical Survey Report Part 1 of 3 [APP-084] This document presents the findings of a magnetic gradiometry survey carried out over the proposed Scheme area. It was noted that the surveys were carried out in Autumn and Winter (Section 1.1). It is noted in Section 5.1 that adverse weather caused a delay in the survey programme, but information should also be provided about how this impacted the work, such as making some areas of the site inaccessible. It is stated that the survey was carried out using a Bartington Cart system (Section 5.5) and a Sensys MAGNETO ® MXPDA push cart (Section 5.11). It would be useful to know if any areas investigated during the survey were inaccessible to the carts and if alternative, hand-held options were used. It would also be helpful to include an explanation of why two different systems were used to survey the site.	The Applicant can confirm that only one of the fields proposed for survey could not be surveyed, which was due to heavily overgrown conditions for which no techniques could be used, for instance hand-held techniques. Weather conditions and adverse ground conditions typically delayed access to several fields as the applicants had to work around seasonal weather, ground conditions and different stages of the agricultural calendar. The Applicant can confirm that the Sensys MAGNETO ® MXPDA system was primarily ATV-towed. Survey along the cable route did also utilise the applicant's updated system, utilising the Sensys system with the Bartington hand-pushed cart. It was the preference to carry out the magnetic gradiometry survey using the Sensys ATV-towed system; however, this required landowner/tenant farmer consent which was not always forthcoming. When this was the case the applicant resorted to the use of the bartington cart system.
HE-WR-40	3.39-3.40	Cultural Heritage and Archaeology	Section 8.1 states that the research objectives were defined by the East Midlands Research Framework. It is not clear why this document was used as the site is not located in the East Midlands. This section should be revised and should refer to the Research Framework for the East of England: https://researchframeworks.org/eoe/.	The Applicant has updated **ES Vol 2 Appendix 6-6 Site A Trial Trench Evaluation Final Report [as updated alongside this submission]** to reference the Research Framework for the East of England. 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**

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			It is noted that some features were identified in areas recorded as 'blank' trenches in the geophysical survey report. This suggests that the potential for archaeology to be present could be higher than indicated in the geophysics report alone, and this should be taken into consideration when developing mitigation strategies.	**DCO [REP1-005]**. The final AMS must be approved by the relevant LPA in consultation with the county archaeologist and HE.
HE-WR-41	3.44-3.45	Cultural Heritage and Archaeology	Section 8.1 states that the research objectives were defined by the East Midlands Research Framework. It is not clear why this document was used as the site is not located in the East Midlands. This section should be revised and should refer to the Research Framework for the East of England: https://researchframeworks.org/eoe/. It is noted that some features were identified in areas recorded as 'blank' trenches in the geophysics report (Section 6.41). This suggests that the potential for archaeology to be present could be higher than indicated in the geophysics report alone, and this should be taken into consideration when developing mitigation strategies.	The Applicant has made the update to reference the Research Framework for the East of England as part of the submission of the final **ES Vol 2 Appendix 6-7 Site B Trial Trench Evaluation Final Report [as updated alongside this submission]**. 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 LPA in consultation with the county archaeologist and HE.
HE-WR-42	3.48	Cultural Heritage and Archaeology	It is stated that further study of the plant remains and charcoal could be beneficial once the assessment of samples from the other areas of archaeological investigation (Sites A, B and D) have been completed (Appendix B). We agree that the value and significance of the assemblage cannot be fully understood until the outstanding environmental samples have been investigated.	The Applicant can confirm that the final reports for the outstanding Sites (Sites B and D) have been provided alongside this submission. These include all specialist assessment (including assessment of environmental samples) and provide the same level of detail as previously provided for Site C.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-43	3.50	Cultural Heritage and Archaeology	The potential palaeochannels recorded in Trench 427 (Section 6.141) may also preserve palaeoenvironmental remains of interest. The potential and significance of the deposits cannot be understood without information from the assessment of the environmental samples.	The Applicant can confirm that the final report for Site D has been provided alongside this submission. This includes all specialist assessment (including assessment of environmental samples) and provide the same level of detail as previously provided for Site C.
HE-WR-44	4.1-4.4	Draft DCO	Draft Development Consent Order [APP-016] Historic England welcomes inclusion of Requirements 15 and 16 within the wording of the draft DCO, which are related to archaeological mitigation and enhancement. However, we have some recommendation regarding the wording of requirements. We recommend that the wording of Requirement 15 (1) is amended to allow for consultation with us in regard to approval of the archaeological written scheme of investigation (WSI). We recommend that the wording of Requirement 16 (1) is amended to allow for consultation with us in regard to approval of the heritage enhancement strategy. We consider that the amendments are required to enable Historic England to be informed of the proposal and provide comment as appropriate to the LPA, to support the LPAs in decision making. This is of particular importance to works affecting scheduled monument within draft Order Limits.	The Applicant accepts HE's proposed amendments and will update the draft DCO at Deadline 3 to list HE as a consultee on the relevant requirements.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-45	4.5-4.7	Draft DCO	Other Consents and Licences Statement [APP-033] Subject to Historic England being consulted on the final Archaeological Mitigation Strategy prior to any works on Site (in accordance with Requirement 15 of the draft DCO [PDA-005]), Historic England is content that the draft DCO would grant Scheduled Monument Consent for the specified works at the 'Roman Small Town south of Great Staughton' scheduled monument (National Heritage List for England ref. 1491190) in accordance with Section 33 of the Planning Act 2008. We understand that the consent would be granted for the following works: installation of the Scheme's electrical cables beneath the monument via horizontal directional drilling (HDD); provision and removal of the temporary construction access across the monument (during construction and decommissioning); creation of wildflower meadow, creation of permissive footpath, and installation of on-site interpretation. We recommend that the applicant provides a list of all works proposed within the boundaries of the scheduled monument as part of the DCO documentation. This is necessary for the sake of clarity and to avoid misunderstandings in the future. The list could be provided within Outline Archaeological Mitigation Strategy.	The Applicant has updated paragraph 7.3.20 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to more clearly define the specific works that are authorised in relation to the Scheduled Monument.
HE-WR-46	4.13	Cultural Heritage and Archaeology	We specifically note the measures relevant to works within the scheduled monument – 'Roman Small Town to the south of Great Staughton' (Table 5.2). The measures include demarcation of the monument,	The Applicant notes and welcomes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			exclusion of construction of activities with exception of HDD and construction of temporary access track, use specific methodology for HDD and construction of temporary access track. We support inclusion of these measures as they are necessary to prevent adverse impacts on the significance of the designated heritage asset.	
HE-WR-47	4.14	Cultural Heritage and Archaeology	We recommend that the timings of removal of temporary access track constructed across the monument are specifically stated among the primary construction stages (paragraph 2.4.3).	The Applicant notes that paragraph 2.4.3 of the **outline Construction Environmental Management Plan (oCEMP) [REP1-032]** is an indicative programme and presents a non-exhaustive list of activities which will be adapted into a final programme as part of the final CEMP once a contractor is appointed. The Applicant has updated Table 5.2 of the **oCEMP [as updated alongside this submission]** to provide additional commitments in relation to the timing of taking the scheduled monument out of cultivation, and in relation to the timing of removal of the temporary access track. For completeness, these commitments have also been added to paragraphs 7.3.36 and 7.3.42 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]**.
HE-WR-48	4.15	Cultural Heritage and Archaeology	We also recommend that the timeframe for certain enhancement measures, such as taking the area of the scheduled monument out of cultivation, is specified among the primary stages of construction. This is needed for clarity and transparency.	The Applicant notes that paragraph 2.4.3 of the **outline Construction Environmental Management Plan (oCEMP) [REP1-032]** is an indicative programme and presents a non-exhaustive list of activities which will be adapted into a final programme as part of the final CEMP once a contractor is appointed.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
				The Applicant has updated Table 5.2 of the **oCEMP [as updated alongside this submission]** to provide additional commitments in relation to the timing of taking the scheduled monument out of cultivation, and in relation to the timing of removal of the temporary access track. For completeness, these commitments have also been added to paragraphs 7.3.36 and 7.3.42 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]**.
HE-WR-49	4.16	Cultural Heritage and Archaeology	In respect of the Site Preparation Works referred to in paragraph 2.4.8 (as outlined in ES Vol 2 Appendix 2-3 Site Preparation Works [APP-057]), we recommend that it is clarified that in addition to provision of the Written Scheme of Investigation, the archaeological evaluation works will need to be undertaken before the commencement of the development. The final scope of archaeological mitigation works likewise would need to be agreed and implemented before commencement of the works in the particular phase of the development.	The Applicant notes this comment, however, considers this is adequately secured by the existing requirements of the **draft DCO [REP1-005]**. Requirement 15(4) of the **draft DCO [REP1-005]** sets out that no phase of the authorised development can commence until a final archaeological mitigation strategy for that phase has been approved by the LPA in consultation with the county archaeologist and Historic England. The final archaeological mitigation strategy must be informed by the outcome of the further archaeological investigations. Thus, it would be expected that the LPA in consultation with the county archaeologist and Historic England would not approve the final archaeological mitigation strategy until the archaeological mitigation works had been completed.
HE-WR-50	4.17	Cultural Heritage and Archaeology	We note that it is assumed that any infrastructure located more than 1m below ground level, would be left in situ (paragraph 2.4.2). However, Outline Archaeological Mitigation Strategy [APP-166] specifies that within the scheduled monument buried cabling would be removed by winching cables out. This	The Applicant has updated paragraph 7.5.6 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to state that the buried conduit would be left in situ, filled with a suitable non-contaminative inert material to prevent any possible risk of future long-term collapse, and

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			commitment is welcome, however, we are concerned that if the plastic casing for the cables is left empty, this will lead, in time, to its collapse and potential damage to the buried archaeological deposits above. We would recommend that ways of infilling the disused casing during decommissioning are explored.	sealed/capped at either end. This commitment has also been made in Table 5.2 of the **outline Decommissioning Environmental Management Plan [as updated alongside this submission]**.
HE-WR-51	4.18-4.21	Cultural Heritage and Archaeology	We note that it is an assumption of the Project that following decommissioning of the solar farm the land will be handed back to the landowners and might return to its original use (paragraphs 2.4.2-2.3). In cases of the areas earmarked for creation of neutral grassland and species rich grassland it would be left to discretion of the landowners to either retain grassland use or revert land to arable use (paragraph 2.4.8). The scheduled monument – 'Roman Small Town south of Great Staughton', lies within an area proposed for creation of species rich grassland. Envisioned reversion to previous land use would not be automatically possible in this case under current legislation, as within 6 years of establishment of grazing regime the land will lose its Class Consent (Class 1 - The Ancient Monuments (Class Consents) Order 1994). In our opinion the most appropriate arrangement would be to secure commitment for retention of the grassland use beyond lifespan of the Project. We consider that the long-term management of the monument would benefit from a degree of additional control following decommissioning. A planning obligation would be the most appropriate mechanism to use. This could be through use of Section 106 of the	The Applicant notes HE's comment and confirms that it is understood reversion to previous land use would not be automatically possible under current legislation, as within 6 years of the establishment of grassland the land would lose its Class Consent. The Applicant will continue to consult with Historic England on this matter, but at this stage does not consider a s106 or Conservation Covenant to be appropriate in this instance.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			Town and Country Planning Act 1990 (as amended) or a Conservation Covenant. We consider that it would be more appropriate to determine the mechanism for ensuring long-term preservation of the monument during examination of the DCO, rather than at the point when the solar farm is being decommissioned (as outlined in paragraph 2.4.8).	
HE-WR-52	4.22	Cultural Heritage and Archaeology	We welcome commitment to consultation with Historic England prior to decommissioning of the scheme, as outlined in paragraph 3.2.3.	The Applicant notes and welcomes HE's comment.
HE-WR-53	4.23	Cultural Heritage and Archaeology	We welcome commitment to undertaking of the decommissioning work in accordance with the Archaeological Mitigation Strategy (AMS) (Table 5.1).	The Applicant notes and welcomes HE's comment.
HE-WR-54	4.24	Cultural Heritage and Archaeology	We note that the decommissioning phase would require construction of a second temporary access track across the monument. This would need to be undertaken in accordance with detailed methodology contained in outline Archaeological Mitigation Strategy [APP-166].	The Applicant notes HE's comment, this commitment is already made in both the **outline Archaeological Mitigation Strategy [REP1-048]** and the **outline Decommissioning Environmental Management Plan [REP1-038]**.
HE-WR-55	4.25	Cultural Heritage and Archaeology	We welcome inclusion of specific management measures within OLEMP for the area covered by scheduled monument (paragraphs 6.3.8-9). We support stated measures – maintaining the site as species diverse grassland meadows without any excavation, ploughing, or planting.	The Applicant notes and welcomes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-56	4.27-4.28	Cultural Heritage and Archaeology	We note that paragraph 3.6.1 states that the archaeological evaluation undertaken during pre-application phase is “sufficient to establish the archaeological resource across the site”. While this statement is correct for the majority of the areas within the draft Order Limits, there are certain areas where archaeological intrusive evaluation has not been undertaken. Most notably, these areas include cable corridors between the sites B and C, and site D and Eaton Socon Substation. Therefore, further evaluation of these areas will be necessary post-consent to establish the presence and significance of any archaeological remains that have not been evaluated yet. We welcome applicant’s commitment to further evaluation mentioned in paragraph 3.6.2. We recommend that the areas specified in section 5 for further geophysical work and/or further intrusive evaluation are clearly depicted on a plan, presented as one of the figures in the OAMS. This is necessary for clarity and for the avoidance of doubt.	The Applicant has update the **oAMS [as updated alongside this submission]** to include a figure highlighting the areas where geophysical survey and intrusive evaluation have yet to be undertaken and would be required as part of the further archaeological works.
HE-WR-57	4.29	Cultural Heritage and Archaeology	We recommend that section 5 should contain specific provision for consultation with Historic England in case of unexpected discovery of heritage assets of equivalent significance to designated heritage assets during the programme of further evaluation.	The Applicant notes HE’s comment and has updated paragraph 5.3.4 of the **oAMS [as updated alongside this submission]** to include provision for consultation with HE in case of unexpected discovery of heritage assets of equivalent significance to designated heritage assets during the programme of further evaluation.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-58	4.30	Cultural Heritage and Archaeology	Final reports covering all phases of evaluation should be made available to, and approved by relevant stakeholders, before the mitigation strategy is finalised.	The Applicant notes this comment. Final reports for all phases of evaluation will be provided to inform the final Archaeological Mitigation Strategy.
HE-WR-59	4.31	Cultural Heritage and Archaeology	Paragraph 6.1.2 outlines the programme of archaeological mitigation measures that will be utilised, which includes preservation in-situ, Strip, Map and Sample, Open Area Excavation and Archaeological Monitoring. These mitigation measures are what we would expect to see.	The Applicant notes and welcomes HE's comment.
HE-WR-60	4.32	Cultural Heritage and Archaeology	We agree that the list of Archaeological Mitigation Measures presented in Table 1 will need to be revised when all evaluation results are available, as outlined in paragraphs 6.1.5-6.	The Applicant notes HE's comment.
HE-WR-61	4.33	Cultural Heritage and Archaeology	We note that preservation in-situ has been given priority where possible. As a result, 29 Areas of Archaeological Constraint (AACs) have been identified within the Scheme, where non-intrusive surface-mounted pre-cast concrete ground anchors and surface matting will be used (paragraphs 6.2.1-4). We support this approach to mitigation by design.	The Applicant notes and welcomes HE's comment.
HE-WR-62	4.44	Cultural Heritage and Archaeology	We are pleased to see that the potential for fired structures to be dated using techniques, such as archaeomagnetism will be considered (Section 6.2.13). The potential of features will be assessed prior to their excavation, which would ensure that opportunities to date the remains are not missed.	The Applicant notes and welcomes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-63	4.35	Cultural Heritage and Archaeology	We recommend that it is clarified that relevant stakeholders will have to approve the site-specific Written Schemes of Investigation before the work is undertaken, in line with Requirement 15 of the draft DCO.	The Applicant accepts HE's proposed amendments to Requirement 15 of the draft DCO and will update the draft DCO at Deadline 3 to list HE as a consultee. Requirement 15(1) of the **draft DCO** will therefore require approval from the county archaeologists and Historic England for the written schemes of investigation.
HE-WR-64	4.36	Cultural Heritage and Archaeology	We recommend that Historic England should also be consulted if a previously unknown heritage asset is discovered, or a known heritage asset proves to be more significant than predicted, to ensure that impacts on assets of national importance are appropriately mitigated. In certain circumstances preservation in-situ might be most appropriate mitigation measure. This should be acknowledged in paragraph 6.3.42.	The Applicant notes HE's comment and has updated paragraph 6.3.42 of the **oAMS [as updated alongside this submission]** to include provision for consultation with HE in the circumstance that appropriate mitigation strategies on assets of national importance need to be developed.
HE-WR-65	4.37	Cultural Heritage and Archaeology	We note the list of the works within scheduled monument to be consented as part of this DCO in paragraph 7.3.20. We would like to highlight that a number of other activities, such as: provision of on-site interpretation, establishment of grassland, provision of permissive footpath, and construction of temporary access during decommissioning phase, which are also mentioned in other application documents in relation to the scheduled monument. It should be clarified if these works will be consented through the DCO or whether a separate application for Scheduled Monument Consent be submitted in due course.	The Applicant notes HE's comment and has updated paragraph 7.3.20 of the **oAMS [as updated alongside this submission]** to provide clarification of the list of works that would require to be consented through the DCO.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
HE-WR-66	4.38	Cultural Heritage and Archaeology	We can confirm that the design and methodology for installation of cables under the scheduled monument by HDD, as outlined in paragraphs 7.3.22-31 and Appendix A is adequate. We support this approach.	The Applicant notes and welcomes HE's comment.
HE-WR-67	4.39	Cultural Heritage and Archaeology	With regard to decommissioning phase (paragraph 7.3.30 and 7.5.4), we note that the cable is to be winched out of the conduit. We support this approach; however, we would additionally recommend that methods for infilling of the disused plastic conduit are explored to prevent its collapse.	The Applicant has updated paragraph 7.5.6 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to state that the buried conduit would be left in situ, filled with a suitable non-contaminative inert material to prevent any possible risk of future long-term collapse, and sealed/capped at either end. This commitment has also been made in Table 5.2 of the **outline Decommissioning Environmental Management Plan [as updated alongside this submission]**.
HE-WR-68	4.40	Cultural Heritage and Archaeology	We are satisfied with the detailed construction design of the HDD under the scheduled monument presented in Appendix A. However, we would like to highlight that the western launch/receiver pit seems to be located within Area of Archaeological Constraint AAC-C-4. The mitigation measures for this AAC are listed in Table 1 as 'Utilisation of No Dig solutions'. We recognise that the locations of the pits are at the moment only indicative. Therefore, we recommend that the final locations are agreed with the stakeholders and impact on archaeological remains is avoided if achievable.	The Applicant notes and agrees with HE's comment.
HE-WR-69	4.41	Cultural Heritage and Archaeology	We can confirm that the design and methodology for installation and removal of temporary access track within the scheduled monument, as outlined in	The Applicant notes and welcomes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			paragraphs 7.3.32-31 and Appendix B is adequate. We support this approach.	
HE-WR-70	4.42	Cultural Heritage and Archaeology	Historic England should be specified as a stakeholder responsible for monitoring works related to scheduled monument (paragraph 10.2.2).	The Applicant has updated Section 10.2 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]** to reference consultation with Historic England.
HE-WR-71	4.43-4.44	Cultural Heritage and Archaeology	It should be noted that an updated version of the Historic England document 'Environmental Archaeology' (2025) is available, and should be referred to for the sampling strategies: https://historicengland.org.uk/images books/publications/environmental-archaeology-3rd/. The Historic England 'Waterlogged Wood' document has also been updated recently and we would recommend that this is referred to: https://historicengland.org.uk/images-books/publications/waterlogged-wood/.	The Applicant notes HE's comment.
HE-WR-72	4.45	Cultural Heritage and Archaeology	Specific sampling strategies may need to be produced for particular remains (e.g. human remains) or for certain types of features (e.g. occupation surfaces, industrial features etc). For example, it is stated in the Historic England document 'The Role of the Human Osteologist in Archaeological Fieldwork Projects' (2018) that spatially distinct samples should be recovered from an inhumation, from the head, torso and leg/foot area: https://historicengland.org.uk/images-	The Applicant notes HE's comment.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			books/publications/role-of human-osteologist-in-archaeological-fieldwork-project/.	
HE-WR-73	4.46	Cultural Heritage and Archaeology	Appendix C presents the Reburial of Archaeological Sites checklist, and Appendix D the Reburial Threats and Risks assessment, which is good to see.	The Applicant notes and welcomes HE's comment.
HE-WR-74	4.47-4.50	Cultural Heritage and Archaeology	Outline Heritage Enhancement Strategy [APP-167] Historic England is content that the Applicant's outline Heritage Enhancement Strategy is appropriate for the purposes of the examination. We understand that in relation to the scheduled monument proposed enhancement measures are as follow: cessation of arable cultivation within designated heritage asset's boundaries and maintaining it under grass; enabling public access through creation of circular footpath, provision of on-site interpretation, commitment to funding further archaeological research. We recommend that the final Heritage Enhancement Strategy should contain details of the above commitments together with timeframes for their implementation. This is necessary to secure their delivery and would enable necessary monitoring of the progress. The finalised document should be agreed with relevant stakeholders. We expect that cessation of arable cultivation within the boundaries of the scheduled monument should be	The Applicant has updated Table 5.2 of the **oCEMP [as updated alongside this submission]** to provide additional commitments in relation to the timing of taking the scheduled monument out of cultivation, and in relation to the timing of removal of the temporary access track. For completeness, these commitments have also been added to paragraphs 7.3.36 and 7.3.42 of the **outline Archaeological Mitigation Strategy [as updated alongside this submission]**.

Our Ref.	HE Ref.	Theme	HE Comments	Applicant Response
			preferably implemented at the same time as start of construction within site C, and no later than commencement of operation within site C. We would welcome confirmation of the timeframe for this commitment by the applicant.	
HE-WR-75	4.51	Cultural Heritage and Archaeology	We consider that proposed enhancement measures would deliver considerable heritage focused public benefit and enhance the significance of the heritage asset.	The Applicant notes and welcomes HE's comment that the Scheme will deliver '*considerable heritage focused public benefit*'.
HE-WR-76	6.1	General comments	Historic England do not object in principle to the Proposed Development.	The Applicant notes and welcomes that HE do not object in principle to the Scheme.

3.2 Response to Natural England

Table 4: Response to Natural England Written Representation (REP1-081)

Ref.	NE Theme	NE Comments	Applicant Response
NE-WR-01	Ecology	Overall, Natural England are satisfied that the proposals have mostly addressed the environmental issues within our statutory remit. We advise the one area which requires further information, to enable the examining authority to make an informed decision, relates to Protected Species Licensing.	The Applicant notes this comment and will provide an update to the Examination on the protected species licencing at the earliest opportunity.

4.0 RESPONSES TO WRITTEN REPRESENTATION – STATUTORY UNDERTAKERS

4.1 Response to National Grid Electricity Transmission

Table 5: Response to National Grid Electricity Transmission Written Representation (REP1-080)

Ref.	NGET Ref.	NGET Comments	Applicant Response
NGET-WR-01	1.1, 1.2	**Introduction** This written representation is submitted on behalf of National Grid Electricity Transmission plc (NGET) in response to the application by BSSL Cambsbed 1 Limited (Promoter) for the East Park Energy Development Consent Order (Order) to enable the construction of the East Park Energy solar farm and battery storage (East Park Project). In summary of NGET's position, NGET considers that it has existing and future infrastructure that needs to be protected via the protective provisions that NGET is proposing be included in the final form of the Order. These protective provisions include wording that has precedent in other development consent orders that have been recently granted. Without inclusion of the protective provisions, serious detriment would be caused to NGET's undertaking as well as to other third-party connectee projects that are reliant on NGET's existing and future infrastructure including the East Park Project itself.	The Applicant acknowledges these comments. Negotiations are ongoing between parties to discuss the form of protective provisions to include in the draft DCO. The Applicant provided comments on NGET's preferred protective provisions on 9 April 2026, which includes comments on provisions relating to existing infrastructure and the interaction with future infrastructure. The Applicant will continue to work with NGET to reach agreement on these so that agreed bespoke protective provisions can be included in the draft DCO.
NGET-WR-02	2.1-2.4	**NGET infrastructure** As set out in NGET's relevant representation dated 14 January 2026 [RR-903], NGET owns assets that form an essential part of the electricity transmission network in	The Applicant acknowledges these comments. The Applicant has engaged with NGET representatives to discuss interactions between the Scheme and the Eaton Socon Substation Project. The Applicant will continue to

Ref.	NGET Ref.	NGET Comments	Applicant Response
		England and Wales either within, or in close proximity to, the East Park Project. This includes the existing Eaton Socon substation, overhead lines and underground apparatus. Additionally, NGET is bringing forward a project to upgrade the existing Eaton Socon substation in the near future (the Eaton Socon Substation Project). The Eaton Socon substation is currently full and will require expansion, rebuild or the provision of a new substation to facilitate future connections (including the East Park Project). The scope of the expansion, rebuild or provision of a new substation at Eaton Socon is as yet unknown and will be determined by the outcome of NESO's Connection Reforms process (as further explained at section 3 below) and optioneering exercises. The point of connection for the East Park Project is therefore subject to these processes. The East Park Project is reliant on the construction and operation of the Eaton Socon Substation Project in order to connect into the National Grid and therefore NGET requires absolute control over the land around the Eaton Socon substation as well as other land in close proximity to the Eaton Socon substation in order to facilitate the Eaton Socon Substation Project and the East Park Project's connection. The Eaton Socon Substation Project is critical infrastructure to enable the connection of multiple projects at this location, with the East Park Project being only one of a number of projects referred to on the National Energy System Operator Transmission Entry Capacity (TEC) register as requiring a future connection to the Eaton	engage and welcomes ongoing collaboration between parties as the projects progress and during construction. A Statement of Common Ground between the Applicant and NGET is being submitted at Deadline 2.

Ref.	NGET Ref.	NGET Comments	Applicant Response
		Socon substation, including for Clearstone Energy Limited's and Telis Energy's projects.	
NGET-WR-03	3.1-3.5	**Connections Reform** As set out in NGET's relevant representation dated 14 January 2026 [RR-903], Connections Reform is a project being run by National Energy System Operator (NESO) to change the way connection applications to the transmission system are handled. Under the Connections Reform process, connections which are ready and satisfy the requirements for strategic alignment are prioritised. Customer applications will be assigned as either a "Gate 1" project, or as a "Gate 2" project, based on whether they meet the necessary criteria. Where a project is designated as "Gate 2", these are projects which are ready for connection. Where a project is designated as "Gate 1", these projects are deemed as not ready and the customer will need to reapply in the future in order to obtain a "Gate 2" offer. We note that the Promoter has received a Gate 2 offer for its connection for the solar farm only, with a Gate 1 offer for the battery connection. As such, NGET are only in a position to progress the designs for the solar connection under the Gate 2 offer at this stage. The Eaton Socon Substation Project will also be subject to the Connections Reform process. An optioneering exercise will follow the outcome of this process to determine whether the Eaton Socon Substation Project will be an extension, rebuild or a new substation located	The Applicant acknowledges these comments and notes that the precise point of connection with the Eaton Socon Substation is dependent on the outcome of NESO's Connection Reforms process. The Applicant can confirm that the Scheme received a 'Gate 2' offer with a connection date of October 2028, with an October 2030 backstop. The Applicant confirms that the wide extent of the Order limits across NGET's land is to ensure flexibility for a connection with the Eaton Socon Substation, once a final detailed point of connection is provided by NGET. Negotiations are ongoing between parties to discuss the form of protective provisions to include in the draft DCO. The Applicant will continue to work with NGET to reach agreement on these so that agreed bespoke protective provisions can be included in the draft DCO.

Ref.	NGET Ref.	NGET Comments	Applicant Response
		outside of the existing substation footprint and determine what is to be delivered by way of third-party connections. Although a connections agreement has been entered into between NGET and the Promoter, the point of connection is subject to the outcome of the processes outlined above. NGET therefore require absolute control of the land immediately around the Eaton Socon substation.	
NGET-WR-04	4.1-4.6	**Protective provisions** In light of the above and given that the scope of the Eaton Socon Substation Project is as yet unknown, NGET require complete control over the undertaking of any works within this area, as well as the location of any cables and infrastructure to ensure that the Eaton Socon Substation Project can be constructed in such a way as to facilitate the required connections (including the East Park Project). This would be secured via NGET's Protective Provisions (at Appendix 2), which would be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards. In particular, NGET seeks to secure protective provisions broadly in line with those that were included in the recently granted Awel y Môr Offshore Wind Farm Development Consent Order (the AYM DCO) and the Mona Offshore Wind Farm DCO (Mona DCO) and being sought in the Dogger Bank South Offshore Wind Farm DCO, Morgan and Morecambe Offshore Wind Farms Transmissions Assets DCO and the Outer Dowsing Offshore Wind DCO. The protective provisions secured under the AYM DCO and the Mona DCO included safeguarding provisions as	The Applicant acknowledges these comments. Negotiations are ongoing between parties to discuss the form of protective provisions to include in the draft DCO. The Applicant provided comments on NGET's preferred protective provisions on 9 April 2026, which includes comments on provisions relating to existing infrastructure and the interaction with future infrastructure having had regard to the protective provisions included in the recently granted DCOs referred to by NGET. The Applicant will continue to work with NGET to reach agreement on these so that agreed bespoke protective provisions can be included in the draft DCO.

Ref.	NGET Ref.	NGET Comments	Applicant Response
		per paragraphs 3 to 7 of NGET's Protective Provisions, along with associated amendments to other standard protective provisions to ensure that they apply to the future NGET works/apparatus/land, e.g. the protective provisions concerning the acquisition of NGET's land by the Promoter in paragraph 11 of NGET's Protective Provisions – without appropriate amendments, these protective provisions would not apply to third party land required for the Eaton Socon Substation Project. Without specific safeguarding provisions for NGET's future upgrade projects, the protective provisions currently included in the draft Order only relate to existing NGET apparatus and land and so there is nothing to prevent the East Park Project from adversely affecting the Eaton Socon Substation Project as set out above to the serious detriment of NGET's undertaking and connectee projects at this location. As such, NGET considers that it is reasonable and appropriate for the safeguards and protections secured for NGET's benefit in the AYM DCO and the Mona DCO to be included in the Draft Order here. For completeness, we include a copy of protective provisions secured under the AYM DCO and the Mona DCO at Appendix 1. A copy of the NGET Protective Provisions are included at Appendix 2.	
NGET-WR-05	5.1-5.6	**Status of negotiations** While discussion remains ongoing, as noted above the Draft Order does not yet contain protective provisions expressed to be for the protection of NGET, making it deficient from NGET's perspective.	The Applicant acknowledges these comments. Negotiations are ongoing between parties to discuss the form of protective provisions to include in the draft DCO. The Applicant provided comments on NGET's preferred protective provisions on 9 April 2026, which includes

Ref.	NGET Ref.	NGET Comments	Applicant Response
		NGET's solicitors Addleshaw Goddard LLP have been engaging with the Promoter's solicitors and provided them with a set of NGET's Protective Provisions on 23 December 2025. As at the date of this submission, NGET has not been provided with comments on the NGET Protective Provisions or on the principles of NGET requiring control of the land around the Eaton Socon Substation in order to facilitate the East Park Project. NGET continues to seek to progress discussions to agree a set of protective provisions to be included in the draft Order. The Promoter has therefore not yet agreed NGET's standard protective provisions despite these having been incorporated into multiple DCOs and being necessary to protect existing NGET apparatus in the vicinity of the Project. Until satisfactory agreement has been reached with the Promoter, NGET must continue to reserve its right to make further submissions to the Examination at a later date, including appearance at any hearings in due course. Should it not be possible to reach agreement with the Promoter, NGET reserves the right to attend any Compulsory Acquisition Hearing or Issue Specific Hearing to address the required format of the protective provisions and any necessary amendment to the Draft Order. If this is necessary, NGET also reserves the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage.	comments on provisions relating to existing infrastructure and the interaction with future infrastructure. The Applicant will continue to work with NGET to reach agreement on these so that agreed bespoke protective provisions can be included in the draft DCO.

5.0 RESPONSE TO WRITTEN REPRESENTATIONS – OTHER INTERESTED PARTIES

5.1 Response to Andy Pike

Table 6: Response to Andy Pike Written Representation (REP1-087)

Ref.	Comments	Applicant Response
AP-WR-01	The Applicant relies heavily on the proposition that the Proposed Development is a "Nationally Significant Infrastructure Project" by virtue of exceeding the 50 MW statutory threshold. While this classification determines the consenting regime, it does not establish that the proposal delivers a materially significant national benefit sufficient to outweigh its site-specific impacts. The 50 MW threshold used to define nationally significant generating stations is expressed in terms of installed (nameplate) capacity. It is not calibrated to reflect the quantity of electricity actually delivered to the grid over time, or the land required to produce that output. That distinction is material.	The Applicant does not suggest that NSIP status, of itself, answers the planning balance without a robust consideration of the benefits and harm from the Scheme. The national benefit case arises from policy in NPS EN-1, under which major renewable generation is needed urgently and is treated as 'Critical National Priority' infrastructure. Installed capacity is the statutory threshold metric for whether a project falls within the NSIP regime. It is incorrect that there is a distinction under Section 15 of the Planning Act 2008 between installed capacity and electricity generated, or that this should be calibrated against a land requirement.
AP-WR-02	The correct approach is therefore to assess energy delivered per unit of impact, not installed capacity in isolation. Viewed in that way, the proposal raises a clear and legitimate question: whether a development of this scale, with its associated environmental, agricultural and community impacts, represents an efficient and justified means of contributing to national energy objectives.	The Applicant disagrees with the notion that that the development should be assessed by way of considering energy generated '*per unit of impact*'. This is not consistent with national policy. In relation to the second limb of the comment, this point is essentially the nature of the planning balance as it should and will be undertaken – do the benefits of the Scheme outweigh the harm, when framed by the requirements of national policy in accordance with Section 104 of the Planning Act 2008.
AP-WR-03	On an illustrative basis, that level of output might be delivered by approximately 24-28 modern onshore wind turbines of around 6	The comparison with an illustrative onshore wind scheme does not materially assist determination of this application for a solar

Ref.	Comments	Applicant Response
	MW each. The total permanent occupied footprint of such a scheme would be materially smaller than the Order Limits of the Proposed Development. Using published estimates that 45 GW of onshore wind would directly occupy around 5,000 hectares, equivalent to approximately 0.11 hectares per MW, a 145–170 MW onshore wind scheme would occupy only around 16–19 hectares on a direct footprint basis, or approximately 2–3% of the proposed 773 hectares of the Proposed Development.	scheme. National policy recognises a critical and urgent need for substantial new low carbon electricity infrastructure across a range of technologies, including solar generation. The fact that other technologies may also contribute to meeting that need does not diminish the policy support for solar, nor create any requirement for a solar NSIP application to justify itself by comparison with a hypothetical wind scheme. This application must be assessed on its own merits, by reference to the applicable policy framework for solar development. It is by no means a material consideration to compare the footprint occupied by a scheme of an entirely different nature and to omit all other impacts that such schemes may result in. For this project, the extent of land for the solar energy generating station (Work No. 1) on the **Works Plan [APP-009]** covers approximately 446 hectares, which is equivalent to 1,102 acres. With reference to paragraph 2.10.17 of NPS EN-3, a typical solar farm requires between 2 to 4 acres for each MW of output; for the Scheme's 400 MW output it would be utilising approximately 2.75 acres per MW, which is consistent with the guidelines in NPS EN-3.
AP-WR-04	Solar output is concentrated in daylight hours and in summer months, when electricity demand, and often system carbon intensity, is lower. Conversely, output is significantly reduced during winter periods, when demand is highest and when dispatchable generation plays a greater role in maintaining system stability. As a result, a unit of installed solar capacity does not necessarily deliver a unit of carbon abatement equivalent to dispatchable generation or to generation that aligns more closely with periods of system demand. It also does not necessarily reduce the need	National policy proceeds on the basis that substantial new renewable generation, including solar, is urgently required as part of the transition to a clean power system, notwithstanding that different technologies have different generation profiles. Policy expressly recognises that a decarbonised electricity system will require variable forms of renewable generation and a significant increase in flexibility and storage to accommodate and shift renewable output, maintain resilience and meet demand.

Ref.	Comments	Applicant Response
	for complementary infrastructure, including storage, grid reinforcement or backup generation.	
AP-WR-05	First, the carbon benefit of the Proposed Development cannot be inferred from installed capacity alone. It depends on when and how electricity is generated and used within the wider system. In the absence of detailed evidence on seasonal output, curtailment, export constraints and system integration, the claimed carbon benefit should be treated with caution. That caution is reinforced by weaknesses in the Applicant's own greenhouse gas assessment, addressed further below, which reduce confidence that the claimed lifecycle carbon benefit has been robustly or conservatively calculated. This reinforces the distinction identified in Sections 2.1 and 2.2: that the planning assessment must consider not only the quantity of energy generated, but the efficiency with which that energy is delivered in relation to land use and environmental impact. Second, the question of carbon efficiency per unit of land take becomes relevant. Where a development requires a very large area of productive agricultural land to deliver a relatively modest quantity of energy, much of it at times of lower system need, it is legitimate to ask whether the same or greater carbon benefit could be achieved through: • deployment on lower-conflict land; • distributed generation on built surfaces; or • alternative technologies or configurations that better align with system demand. This is not to suggest that solar generation lacks value. It is to recognise that, at scale, the efficiency with which carbon benefit	The Applicant's greenhouse gas assessment is presented transparently across **ES Vol 1 Chapter 15 [APP-051]** and **ES Vol 2 Appendix 15-1 Greenhous Gas Assessment [APP-116]**. The assessment has been prepared by competent experts in accordance with industry recognised best practice, and is based on energy generation calculations that allow for the fact solar does not generate peak electricity consistently across a full year. The question of '*carbon efficiency per unit of land*' is not a specific policy test or a material relevant consideration in the assessment of the merits of the Scheme.

Ref.	Comments	Applicant Response
	is delivered, including land-use efficiency, is a material planning consideration.	
AP-WR-06	Within the Applicant's GHG Assessment (APP-116), specifically Table 16 – GHG emissions over the lifetime of the Scheme, emissions during the operational phase for "travel of workers to site" are reported as only 0.4 tCO_2e over the lifetime of the Scheme. Given that the Applicant identifies approximately 20 operational staff, and indicates that these may travel up to a 100 km round trip to site, this figure appears unrealistically low when considered against the scale of activity implied. On an order-of-magnitude basis, such assumptions would be expected to generate a substantial volume of vehicle kilometres over a 40 year operational period. The reported emissions figure is not explained in a way that allows it to be reconciled with those inputs.	Table 16 within **ES Vol 1 Chapter 15 Climate Change [APP-051]** has been reviewed, and an error in the calculation of GHG emissions associated with the travel of workers has been identified. During operation, the travel of workers has been recalculated using the following set of conservative assumptions: • Distance to Site: 50 km each way (100 km round trip); • Operational staff (Full time equivalent roles): 20; • Working days per role: 232 days per year; and • Lifetime of Scheme: 40 years. During construction, the travel of workers has been recalculated using the following set of conservative assumptions: • Distance to Site: 50 km each way (100 km round trip); • Average number of staff: 495.5 per month; • Working days per role: 232 days per year (19.3 days per month); and • Length of construction: 30 months. To calculate the GHG emissions, the following 2025 DESNZ GHG emission factor (and WTT emissions factor) have been utilised: • Average car emission factor (unknown fuel): 0.16726 $kgCO_2e/km$

Ref.	Comments	Applicant Response
		• WTT Average car emission factor (unknown fuel): 0.04399 $kgCO_2e/km$ Based on these parameters, the GHG emissions associated with staff travel are calculated as follows: <u>Operation:</u> 20 staff x (50 km x 2) x 232 days per year x 40 years x (0.16726 $kgCO_2e/km$ + 0.04399 $kgCO_2e/km$) = 3,921 tCO_2e. <u>Construction:</u> 495.5 staff x (50 km x 2) x 19.3 days per month x 30 months x (0.16726 $kgCO_2e/km$ + 0.04399 $kgCO_2e/km$) = 6,061 tCO_2e. It must be noted that the travel of workers during decommissioning has been assumed to be the same as construction at this stage. Therefore, the travel of workers results in an estimated 3,921 tCO_2e during operation and 6,061 tCO_2e during construction and decommissioning. This value represents a minor portion of the overall GHG emissions and does not change the conclusions of the assessment. For context, this adjustment increases the lifetime GHG intensity of the Scheme by just 0.9%. The Applicant has revised **ES Vol 1 Chapter 15 Climate Change [as updated alongside this submission]** and **ES Vol 2 Appendix 15-1 GHG Emissions Assessment [as updated alongside this submission]** to include these updated calculations. It is important to emphasise that GHG emission calculations are continually evolving. The Applicant is committed to ensuring

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		assessments are suitable for establishing the likely significant effects of the Scheme.
AP-WR-07	More broadly, the GHG Assessment relies on a series of simplifying assumptions which are not supported by sufficient evidence or sensitivity testing. These include: • use of generic or mid-point emissions factors without testing across plausible ranges; • absence of supplier-specific embodied carbon data for key electrical components; • treatment of sulphur hexafluoride (SF_6) emissions as negligible without quantified, project specific evidence; and • absence of meaningful sensitivity analysis across key assumptions such as equipment replacement cycles, supply-chain origin and future grid carbon intensity.	The Applicant's greenhouse gas assessment is presented transparently across **ES Vol 1 Chapter 15 [APP-051]** and **ES Vol 2 Appendix 15-1 Greenhous Gas Assessment [APP-116]**. The assessment has been prepared by competent experts in accordance with industry recognised best practice. The Applicant understands that there are limitations with **ES Vol 2 Appendix 15-1 [APP-116]** but would like to emphasise that the assessment has been produced to fulfil the requirements of the EIA Regulations and identify likely significant effects, and is not expected to be a full lifecycle carbon assessment. The equipment specifications have not been chosen so specific EPDs cannot be incorporated into the assessment. Generic conservative assumptions have been used instead. Emission factors and data sources have been disclosed in section '4.0 Emissions factors' of **ES Vol 2 Appendix 15-1 [APP-116]**. In relation to sulphur hexafluoride, the Applicant's professional opinion is provided at paragraph 2.2.4 **[APP-116]**. The approach taken is both appropriate and proportionate. Conservative assumptions have been made in terms of geographies, and these have been outlined in Table 5 of **ES Vol 2 Appendix 15-1 [APP-116]**. This allows for solar PV modules, transformers, inverters and batteries coming from China; cables and mounting structure coming from Europe; and fencing, concrete cement and aggregate coming from the UK.
AP-WR-08	During Issue Specific Hearing 2, the Applicant confirmed that the identification of the preferred search area was driven principally by the availability of a grid connection at Eaton Socon, with	The Applicant has a connection agreement for a point of connection with the Eaton Socon Substation.

Ref.	Comments	Applicant Response
	agricultural land quality then considered within that constrained geography. This is material. It indicates that the assessment of alternatives was effectively bounded by a single connection offer, rather than by a comparative evaluation of reasonable alternatives across a broader spatial or grid context.	Following the widely publicised grid reform process undertaken by the National Energy System Operator (NESO) over the past few years, the Applicant received a 'Gate 2' generation connection offer to the Eaton Socon Substation which is 2030-aligned. This connection offer is not transferable to another point of connection, and is not speculative. The connection offer has always been for the Eaton Socon Substation, and that has therefore dictated the site selection process and consideration of alternatives. An alternative point of connection such as the Little Barford Power Station (which has been raised by SEPE as well as other Interested Parties) has therefore not been considered as it is not a viable alternative for this project. Paragraph 4.3.22 of NPS EN-1 is clear that "*the consideration of alternatives is to be proportionate and limited to alternatives that can meet the objectives of the proposed development*" [emphasis added]. An alternative point of connection to any other substation (including the Little Barford Power Station) would not meet the objectives of this project – such alternatives therefore do not need to be considered by the Applicant. It is acceptable for the assessment to focus on the point of connection that has been offered, and to assess the scheme on that basis. Such an approach was considered by the Secretary of State on the consented Gate Burton Energy Park NSIP – on that case, at paragraph 3.2.77 of the Examining Authority's Recommendation Report the ExA concluded that it is not an unreasonable starting point for an Applicant to take the agreed point of connection with the grid as a basis for considering alternatives. In *Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 2842 (Admin)*, the High Court upheld an approach in which proximity to an available grid connection point was treated as a primary

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		site selection factor affecting viability, noting that a connection agreement had been secured.
AP-WR-09	The consequence of this constrained and untested search approach is that the use of Best and Most Versatile agricultural land within the Order Limits cannot be assumed to be necessary. Where a substantial area of higher-quality land is proposed to be taken for a multi-decade development, the planning question is not simply whether such land can be used, but whether its use has been demonstrated to be unavoidable in the context of reasonable alternatives. In the absence of a comparative assessment extending beyond the 15 km radius, there is no sufficient evidential basis for concluding that lower-grade land options, or materially less harmful configurations, were not reasonably available. This materially reduces the weight that can be given to the Applicant's site selection case and correspondingly increases the weight to be attributed to the loss of Best and Most Versatile land in the planning balance	There is no 'sequential test' requirement for BMV agricultural land within the EIA regulations, or within the designated energy NPSs. This principal was tested through the courts in *Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 2842 (Admin)*. The judge held that Planning Practice Guidance requires decision makers to consider whether the use of agricultural land has been shown to be necessary, whether poorer quality land has been preferred, and whether the scheme would allow continued agricultural use or biodiversity benefits. The guidance does not require an applicant to prove that every other possible site has first been ruled out, and it does not create the kind of strict sequential exercise that applies in other areas such as flood risk. NPS EN-3 pushes applicants toward previously developed and lower quality land where possible, and says that where agricultural land is necessary, poorer quality land should be preferred and the use of best and most versatile land avoided where possible. At the same time, NPS EN-3 also makes clear that ground mounted solar is not prohibited on best and most versatile land. NPS EN-3 states at paragraph 2.10.31 that "*Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land*". This is what the Applicant has transparently done as part of the **Site Identification Report [APP-058]**. A clear sequential approach was followed to rule out brownfield or previously developed land and demonstrate that agricultural land was necessary to meet the project objectives; and that once it was established that agricultural land was necessary, development was directed towards areas of land

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		where best and most versatile land was less likely to occur – thus, poorer quality land was demonstrably preferred by the Applicant, whilst taking into account other factors (set out in NPS EN-3) which influence site selection. Had the Applicant not sought to prefer lower quality land, then it is possible that none of the 'Search Zones' identified in the **Site Identification Report [APP-058]** and shown clearly on Figure 6 of that document would have been identified – as set out at paragraph 5.4.2 of the **Site Identification Report [APP-058]**. The Applicant's justification for selecting a 15km area of search is set out in Section 3.3 of **ES Vol 2 Appendix 3-1: Site Identification Report [APP-058]**. There is no statutory or policy requirement to set an area of search based on a specific radius, it is a matter of judgement for the Applicant to decide in relation to the commercial feasibility of the development. The Applicant considers that the area of search was reasonable and proportionate. The Applicant notes that other consented solar NSIP developments (including Sunnica in the Cambridgeshire area) have used similar 15km areas of search. In addition, some projects have used smaller areas of search, such as the consented Helios Renewable Energy Project which has a generating capacity of 190 MW and considered a 5km area of search around its point of connection.
AP-WR-10	A further limitation of the Transport Assessment is its reliance on averaged traffic flows rather than assessment of peak-day and peak-hour conditions. In practice, it is peak construction activity, not averages, that determines safety risk, congestion and community impact, particularly in a rural village environment with school movements and constrained road geometry. This	The analysis of potential impacts of construction traffic as presented in the **Transport Assessment (TA) [APP-101]** and **ES Chapter 9 [APP-045]** was not reliant on averaged traffic flows. Table 6.4 in the **TA [APP-101]** clearly provides an appraisal of the percentage impact on the local highway network for the

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	omission materially understates the likely real-world effects on Hail Weston.	month during which the peak number of construction staff movements will occur. The follow-up **Technical Note on Impact on B645-A1 St Neots Junction [REP1-066]** submitted at Deadline 1 assessing the impact of construction traffic on the operation of the A1 / B645 junctions during highway peak hours is also based on forecast daily staff movements during the peak month. The assessment of environmental effects included within **ES Chapter 9 [APP-045]** included consideration of the daily number of HGVs that would be generated during the peak month of HGV activity (Table 9.16 **[APP-045]**). The estimated daily arrival and departure profiles for construction traffic during the peak HGV (month 2) and peak staff (month 12) scenarios are clearly set out in Tables 5.3 and 5.4 within the **TA [APP-101]**.
AP-WR-11	Where traffic is concentrated on constrained routes, diversion onto minor roads is a well recognised and foreseeable consequence. Drivers, particularly those unfamiliar with the area or relying on navigation systems, may seek alternative routes to avoid congestion, delay or perceived restriction. The road network surrounding Hail Weston provides multiple opportunities for such diversion. However, these routes are: • narrower and less structurally robust than the B645; • often single-track or with limited passing places; • used by pedestrians, cyclists and local agricultural traffic; and • not designed to accommodate HGV movements.	As expressly set out within the construction traffic routing strategy within the **outline Construction Traffic Management Plan (oCTMP) [REP1-034]**, during normal construction operations all HGVs would be required to access the Site via the approved HGV access route via the B645 from the A1. These movements would be monitored, with any breaches noted and remediated, as per the measures set out in the oCTMP, which provides additional commitment to identifying a suitable GPS or camera-based monitoring system. The only permissible use of any alternative access routes would be as part of an authorised diversion route put in place by the police / National Highways / LHAs in the event of road closures. It is not considered that binding requirements on construction routes, with regard to identifying specific prohibited routes, are necessary. The oCTMP identifies proposed measures for

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	Even a relatively small proportion of diverted traffic could result in a material change in safety and amenity conditions on these roads. These diversion risks are illustrated spatially in Appendix B, which identifies the local road network characteristics and those routes that are inherently unsuitable for construction traffic and must therefore be subject to explicit No-Go / No-Through controls.	monitoring construction traffic movements to ensure adherence to the prescribed access route and enforcing any breaches. It is considered that these proposed monitoring and enforcement mechanisms will provide the necessary level of safeguarding against any breaches.
AP-WR-12	Ford End Road represents a particularly unsuitable route linking Hail Weston to the A1/Little Paxton junction. It is a narrow rural lane with limited width, poor surface condition and constrained geometry. Critically, it includes a ford crossing that is prone to flooding and periodic closure. During periods of high rainfall, water levels can rise rapidly, rendering the route hazardous or impassable. Use of this route by project traffic would introduce significant risks, including: • vehicles becoming stranded or damaged at the ford; • unsafe interactions between vehicles attempting to pass on constrained sections; and • obstruction of access for residents and emergency services. These characteristics make Ford End Road wholly unsuitable for any form of project-related traffic. This is not a theoretical assessment. The physical constraints, surface condition and flood-prone characteristics of Ford End Road are demonstrated by photographic evidence at Appendix A, which evidences the limited width, constrained geometry and unreliability of the route under normal and adverse conditions.	It is not proposed that Ford End Road would be used as a construction access route. The proposed construction access strategy is described in Section 5.1 of the oCTMP [REP1-034] and illustrated in the plan included at Appendix C of the oCTMP. The only permissible use of any alternative access routes would be as part of an authorised diversion route put in place by the police / National Highways / LHAs in the event of road closures.

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AP-WR-13	The impacts assessed within the Transport Assessment are predicated on assumed routing behaviour. If those assumptions are not secured, the actual impacts experienced may differ materially from those assessed. The necessity for such controls is not theoretical but is evidenced by the physical and network constraints illustrated in Appendix A (Ford End Road) and Appendix B (No-Go / No-Through routing plan), which demonstrate that without enforceable restrictions, diversion or non compliant routing would give rise to foreseeable and unacceptable safety risks. It is therefore essential that routing controls are not left to guidance or contractor discretion, but are secured through enforceable provisions. All routes through Hail Weston, including High Street, Bird Lane, Green Lane and Ford End Road, should be designated as No-Go / No-Through routes for all categories of project traffic.	It is not considered that binding requirements on construction routes, with regard to identifying specific prohibited routes, are necessary. The **oCTMP [REP1-034]** identifies proposed measures for monitoring construction traffic movements to ensure adherence to the prescribed access route and enforcing any breaches. It is considered that these proposed monitoring and enforcement mechanisms will provide the necessary level of safeguarding against any breaches.
AP-WR-14	The application does not clearly assess: • whether BESS units are located in areas at risk of flooding; • how floodwater could interact with electrical infrastructure; • the potential mobilisation of contaminants during flood events; or • the resilience of containment systems under such conditions.	**ES Vol 2 Appendix 8-1 [AS-018]** provides a flood risk assessment for the Scheme, the supporting figures show areas of flood risk relative to the Site, whilst design and mitigation measures are also identified. The BESS units are not considered to be at risk of flooding. Mitigation measures for flood risk and drainage are clearly defined within: • Table 5.4 of the **outline Construction Environmental Management Plan [REP1-032]**; • Table 5.4 of the **outline Operational Environmental Management Plan [REP1-036]**;

Ref.	Comments	Applicant Response
		• Table 5.4 of the **outline Decommissioning Environmental Management Plan [REP1-038]**; • **outline Surface Water Management Plan [REP1-046]**; and • **outline Battery Safety Management Plan [APP-162]**. These documents would be certified under the DCO and secure the mitigation required to ensure there would be no adverse impact to electrical infrastructure from floodwater, the potential mobilisation of contaminants, and the resilience of containment systems.
AP-WR-15	The absence of a secured financial mechanism in other schemes does not reduce the level of risk in this case. Rather, it highlights a systemic gap in how long-term liabilities have been addressed in the sector to date. The Examining Authority is not bound to replicate that approach and has the ability, and in my submission the responsibility, to ensure that appropriate safeguards are secured where a material and foreseeable risk has been identified.	The Applicant does not accept Mr Pike's submission that the absence of a secured financial mechanism for decommissioning and restoration in other consented solar NSIP schemes reflects any "systemic gap" in the way long-term / decommissioning liabilities are addressed. The Applicant's position is that the **draft DCO [REP1-005]** and the **outline Decommissioning Environmental Management Plan ("oDEMP") [REP1-038]** secure decommissioning and restoration in a clear and enforceable manner. In particular, Requirement 18 of the **draft DCO [REP1-005]** provides an appropriate mechanism for securing decommissioning and restoration at the end of the operational life of the Scheme. The Applicant is fully aware of its statutory duties under the Order in respect of decommissioning, and notes that any undertaker benefitting from the Order would similarly be required to comply with those statutory duties. It is a criminal offence under Section 161 of the Planning Act 2008 ("PA 2008") to fail to comply with a requirement in a DCO. In addition, the Proceeds of Crime Act 2002 operates as a further deterrent, noting that the authorised development would represent a valuable asset.

Ref.	Comments	Applicant Response
		Against that background, the Applicant maintains that there is no basis for the proposition that long-term decommissioning liabilities are under-secured, or that that this reflects any "*systemic gap […] in the sector to date*." Further, the approach taken in the draft DCO and other solar DCOs reflects a deliberate and consistent application of national policy, in particular paragraphs 2.10.146 to 2.10.151 of NPS EN-3, read alongside paragraph 4.1.16 of NPS EN-1. Those policies require an applicant to put forward "outline plans for decommissioning" and for DCO requirements to "secure the actual decommissioning itself". They do not require the provision of a decommissioning bond or other ring-fenced financial security. This policy position has been expressly tested through examination on a number of occasions and consistently upheld by the Secretary of State. Most notably, in the decision on the Oaklands Farm Solar Park Order 2025, the Secretary of State omitted a recommendation for a decommissioning fund requirement, confirming that "*there is no policy requirement for a decommissioning fund to be imposed*" and that imposing such a requirement was not "necessary", having regard to paragraph 4.1.16 of NPS EN-1. That approach has been consistently applied in other examinations and decisions, including for the Stonestreet Green Solar Order 2025. In reaching those conclusions, both Examining Authorities and the Secretary of State have also had regard to the nature of solar development itself, including paragraph 2.10.68 of NPS EN-1 which recognises that "solar panels can be decommissioned relatively easily and cheaply". The settled position is therefore that reliance and weight can be given to the controls available within the planning regime (notably the existence of offences for

Ref.	Comments	Applicant Response
		breach), which offer sufficient protection to enforce decommissioning and restoration obligations and/or liabilities. For these reasons, the Applicant maintains that there is no evidential or policy basis for the "systemic gap" suggested by Mr Pike, and that decommissioning liabilities are appropriately secured through the draft DCO and the certified control documents.
AP-WR-16	In the context of long-term infrastructure liabilities of this nature, reliance on a parent company guarantee or general corporate support is not, in my experience, a sufficient or reliable mechanism for securing decommissioning and restoration obligations. By way of example, I have direct professional experience of major infrastructure providers entering insolvency as a result of financial exposure arising from unrelated projects in other jurisdictions, including the insolvency of CNIM Group and AE&E GmbH. In those cases, corporate failure at group level resulted in a rapid deterioration in the value and enforceability of parent company support arrangements, with consequential implications for projects in other countries, including the UK. This is a recognised risk in the infrastructure sector. Parent company guarantees are only as robust as the ongoing financial strength and stability of the guarantor. They are not ring-fenced, may be affected by wider group liabilities, and can become of limited or no practical value in circumstances of insolvency, restructuring or cross-default.	The Applicant is a subsidiary of Lantern HoldCo Limited, the ultimate holding company of the Brockwell Energy group. Brockwell Energy's majority shareholders are Davidson Kempner ($37 billion AUM) and Pioneer Point Partners (€1.7 billion committed equity across Europe). The group has secured over £500 million of debt financing across three large-scale infrastructure projects. This demonstrates substantive and well-capitalised backing. With respect to decommissioning and restoration obligations, the Applicant maintains for all the reasons outlined above, that decommissioning liabilities are appropriately secured in the draft DCO (in particular, Requirement 18) as well as control documents in a clear and enforceable manner which is both consistent with established practice on solar DCOs and the Secretary of State's position on this issue. This is evidenced most clearly in the decision letter on the Oaklands Farm Solar Park Order 2025, where it was held that "*there is no policy requirement for a decommissioning fund to be imposed*", that *"the Secretary of State does not consider that imposing a decommissioning fund requirement is necessary*" and that this approach was in accordance with paragraph 2.10.146 to 2.10.151 of NPS EN-3 and paragraph 4.1.16 of NPS EN-1, which stipulate, amongst other things, that the Secretary of State

Ref.	Comments	Applicant Response
		should "*only impose requirements that are… necessary*" and "*that only relevant requirements should be imposed*." All of this reinforces that the information provided with this application evidences the Applicant's standing and financial capabilities and that the draft DCO and relevant control documents reflect a coherent and established approach to securing decommissioning, restoration and compensation liabilities. All of the matters raised are already appropriately secured within this framework.

5.2 Response to Ann Kennedy

Table 7: Response to Ann Kennedy Written Representation (REP1-089)

Ref.	Comments	Applicant Response
AK-WR-01	I do want to stress that the three properties on the B660 to the south of where the Keysoe Brook flows below the road are already under risk of flooding, both from the brook and from surface water flash flooding. This risk appears to us to be significantly increased by the development, with the land in the field that currently acts as an informal flood plain becoming less able to absorb the rain due to the lack of mole-draining and regular cultivation leading to more compacted land over time. The implications of increased flood risk are potentially very significant – not only in terms of the concerns about damage to our property but also the financial implications for insurance cover and premia (on a Grade 2 listed building) and for potential future saleability – we are after all [redacted] and had been envisaging down-sizing within the next decade or so.	The Applicant recognises the concern in relation to flood risk. The Scheme is located downstream of the properties in question alongside the B660. The surface water drainage strategy presented in the **outline Surface Water Management Plan [REP1-046]** will manage runoff so that the development does not increase off-site flood risk. There would be a neutral or beneficial effect on on-site and off-site surface water flood risk.

5.3 Response to Bedford Local Access Forum

Table 8: Response to Bedford Local Access Forum (REP1-095)

Ref.	Comments	Applicant Response
BLAF-WR-01	Request 1 - Perimeter route linking B&K FP32 to Pertenhall FP2 APP-121 Figure 2-1b This additional footpath, outside the perimeter fence to the west of Site, would provide: • A connection between the two footpaths, thereby increasing the options for circular walks; and • Views to the west towards Swineshead, partly compensating for views lost elsewhere Whilst it would be more pleasant to have hedging between the footpath and the fence, this would not be an absolute necessity.	A potential permissive connection in this location is constrained by the need to provide an additional crossing of the Pertenhall Brook and has therefore not been pursued.
BLAF-WR-02	This track extends the road past Manor Farm at Green End, Pertenhall to FP29. The footpath is currently recorded as a dead-end but agreement to dedicate the link would avoid the need to make a definitive map modification. BOBLAF understands that the Applicant may have indicated a willingness to accept this.	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.
BLAF-WR-03	Request 3 - Bridleway linking Green End, Little Staughton and Brook End (B660) APP-121 Figure 2-1e and Figure 2-1f At the Open Floor Hearing a representative of the Applicant stated that this request would be accepted. This has not yet been confirmed in writing and so we include it for completeness.	The Applicant can confirm that agreement has been reached to provide permissive equestrian access between the B660 and Green End, Little Staughton. This is identified in Table 2 of the **outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]** as Permissive Path 1 and shown on the Illustrative Landscape Proposals drawing at Appendix A of the oLEMP.

Ref.	Comments	Applicant Response
	BOBLAF considers that this route (and indeed all our requests should be dedicated, not permissive). The map of this route has been provided to you by The British Horse Society and is not duplicated here. It is however marked with blue dashed lines on the attached sheets of the masterplan.	
BLAF-WR-04	Request 4 - Perimeter route linking B&K FP36 to B&K FP13 APP-121 Figure 2-1e This route to the west of Site B would provide • A connection between these two footpaths and also B&K FP47, thereby increasing the options for circular walks; and • Views to the outside of the development, partly compensating for views lost elsewhere • A walk alongside a large area of grassland with the opportunity to observe any wildlife there	The Applicant notes there is already access between Bolnhurst and Keysoe Footpath 36 and Bolnhurst and Keysoe Footpath 13. The Applicant is not proposing an alternative permissive route in this location.
BLAF-WR-05	Request 5 - Perimeter route linking Little Staughton FP26 to B&K FP47 APP-121 Figure 2-1d and Figure 2-1e Another route that provides good connectivity to achieve a circular walk, particularly beneficial to dog-walkers in the Pertenhall and Keysoe, whilst offering some more open views.	The Applicant disagrees that this potential permissive access route would compensate for the loss of open views, due to the existing mature hedgerows that lie along site boundaries in this area. The Applicant is not proposing a permissive route in this location.
BLAF-WR-06	Request 6 - Connection from eastern end of LS FP8 to LS FP1 via site access tracks APP-121 Figure 1-2f At present the connection between these two footpaths is made via the road, approximately 1km on a narrow road with limited	The Applicant is consulting with the landowner but is not currently proposing to provide this permissive access.

Ref.	Comments	Applicant Response
	verges, one T junction and a blind bend. This connection, through the site, would be much safer even though mostly of site access roads. As we said in our RR, these routes (and indeed the few permissive routes already included in the proposal) should be provided on a dedicated basis as the impact of the development on views will be permanent. If the ExA is not inclined to accept that and determines that permissive routes are appropriate, then this permission must extend throughout the life of the solar facility and until the land is returned to agriculture. We omitted reference to EN-3 in our RR, which reinforces the more general local and national policies regarding public rights of way in solar developments by saying in 2.10.36: *Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.* We restate our belief the opportunities for the developers and landowners to provide some benefit to local residents (and indeed those from further afield) has been largely ignored. Our proposals seek to ensure that the recreation, sustainable transport, enjoyment and health benefits of the PROW network are preserved and enhanced, in accordance with both local and national policy.	
BLAF-WR-07	BOBLAF does not consider that the Applicant should be given powers to alter, remove or replace (ie divert) existing public rights of way, other than those specifically defined in the	The powers within the **draft DCO [EN010141/DR/3.1]** that allow changes to be made to public rights of way (PRoW) outside of those listed in the Schedules to the draft DCO are necessary in case there are unexpected issues at the point of implementation

Ref.	Comments	Applicant Response
	schedules and rights of way and access plans. The reference which allows unspecified changes to public rights of way should be removed. (Schedule 9 s1(b) of the draft DCO – APP-016) Any such further changes to the existing PROW network should be subject to the appropriate legal processes as required in the Highways Act.	that necessitate further works / measures to be implemented to facilitate the authorised development. These powers cannot be exercised unilaterally by the Applicant and would require the Applicant to obtain the approval of the relevant authority in each case. Article 15(3) (temporary stopping up of streets and public rights of way) provides that the powers conferred in this article cannot be exercised without the consent of the street authority, who may attach reasonable conditions to such consent (see sub-paragraph 15(4)(b). As such, CCC (and other authorities where relevant) will retain the ability to approve or refuse any works / measures that are not listed in the Schedules to the draft DCO. For these reasons it is considered that the powers sought in the draft DCO are well precedented, proportionate, and appropriate. It is noted that similar powers have been included in many granted DCOs, including the Cambridge Waste Water Treatment Plant Relocation Order 2025. It is also worth noting that diversions or stopping up of public rights of ways is regulated not only by the Highways Act 1980 but also by the Town and Country Planning Act 1990, where the process followed for such diversion is not dissimilar to that proposed by the Applicant in line with statutory provisions within the Planning Act 2008. Section 1(b) of Schedule 9 to the draft DCO sets out the extent of the new rights the Applicant seeks to acquire compulsorily in respect of the plots listed within this Schedule 9. This is proposed to be carried out in private land and not in respect of publicly adopted public rights of way and ensures that appropriate alternatives are provided in every instance a public right of way has been diverted.

5.4 Response to British Horse Society – Cambridgeshire

Table 9: Response to British Horse Society (Cambridgeshire) Written Representation (REP1-098)

Ref.	Comments	Applicant Response
BHSC-WR-01	I note that there are some dotted pink lines on the land to the south of Great Staughton in Figure 1-2i of the environmental masterplan (APP-121) but this is not indexed on the key nor annotated on the Figure. By comparison with the Figure 1-2g which shows some permissive paths near Little Staughton in similar style, it may perhaps be presumed that these lines indicate an intention to provide a permissive footpath? The BHS and CCC wish to see an equestrian access around the significant grassland area (see paragraph 7.31 of CCC's RR-150). On the assumption that the line on Figure 1-2i does indicate an intention to provide access we comment as follows: • These access paths should be of at a minimum bridleway status – ideally restricted byway which would permit horse drawn carriages but not motor vehicles • The paths should be around the whole of the grassland area not just about one third of it • Access at the higher status must be provided from both the village to the north and from Moor Road to the south west (making as short a road connection to Hail Weston BW112/7 as possible) • The status of the site as a scheduled monument can be protected and such use should have no adverse effect • These routes should be delivered as dedicated rights of way to ensure long term mitigation for the development and its adverse impacts.	The Applicant notes that new permissive access is proposed in Site C within Cambridgeshire. This has been clarified in Table 2 of Section 5.3 of the **oLEMP [REP1-040]**. The Applicant is proposing a circular permissive footpath within the fields in the north of Site C as shown on Figure 3 at Appendix A of the **oLEMP [REP1-040]**. The Applicant notes this would not provide equestrian access.

5.5 Response to British Horse Society – Bedfordshire

Table 10: Response to British Horse Society (Bedfordshire) Written Representation (REP1-099)

Ref.	Comments	Applicant Response
BHSB-WR-01	On behalf of local riders, I was pleased to hear the oral commitment of the Applicant's representative to provide the requested connecting bridleway from Little Staughton Green End to the B660 at Keysoe Brook End and trust that this commitment will be reflected in the latest submissions.	The Applicant notes this comment. This is identified in Table 2 of the **outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]** as Permissive Path 1 and shown on the Illustrative Landscape Proposals drawing at Appendix A of the oLEMP.
BHSB-WR-02	However, that commitment was made with the limitation that it would be a permissive bridleway only for the duration of the project. As I said in the RR, "The fact that the adverse impacts will be permanent as the views will continue to adversely affected after the solar operations finish justifies this requested link being provided as a dedicated bridleway and not merely permissive, even for the whole of the lifetime of the development until the land is returned to agricultural use." In addition, the alternative road route (3.6km) will remain hazardous and is likely to become more so over time due to increasing vehicle volumes. I therefore ask that this bridleway, which will be much welcomed, be provided on a permanent, dedicated basis as soon as construction work in Site B is completed. This obligation should be reflected in the DCO.	The Applicant is proposing that the access is provided on a permissive basis only, and is not putting forward this change on a permanent basis as a modification to the definitive map for the area. The Applicant recognises this results in more limited public benefit than a permanent public right of way.
BHSB-WR-03	For Pertenhall BW26 I have suggested putting a diversion on the other side of the hedge from the farmyard and construction access route. For Bolnhurst & Keysoe BW39 I have suggested that a diversion can be created along other tracks and headlands to bypass the construction area. This is shown in blue below (on an extract of the environmental masterplan APP-121).	The Applicant has reviewed the oPROWMP and sought to strengthen protections for equestrian users along both Bolnhurst & Keysoe BW37 and Pertenhall BW26. The Applicant's amendments are set out at paragraphs 6.4.5, 6.4.6, and 6.8.5 of the **oPROWMP [REP1-042]**. The purpose of these amendments is to provide clearer 'right of way' for equestrian users of

Ref.	Comments	Applicant Response
	There may be other alternatives that could be proposed by the Applicant, and the Society will support any diversion that achieves separation of horses from the risks associated with the use of the bridleways as construction access roads and with construction noise and activity. I acknowledge that to achieve this objective the diversion route will be outside the red line, but the land is in common ownership with most of Site A (possibly all of it) and it would be a travesty of justice to use that as an excuse not to provide a safe route for rights of way users.	Pertenhall BW26, and to ensure greater precaution from traffic using both bridleways when equestrian users are present. The Applicant notes that construction traffic in Site A from the B660 would be split between traffic passing north along Pertenhall BW26 to the construction compound in the north of Site A, and traffic passing south along Bolnhurst and Keysoe BW37 to the two construction compounds in the south of Site A. As set out in **ES Vol 2 Appendix 9-2 Traffic Flow Diagrams [APP-102]**, during the peak of HGV movements, there would be an average of 5 (one-way) HGVs per day, which as above would be split between BW26 and BW37. This is a very limited number of HGV movements, and the control measures set out in the **oPROWMP [REP1-042]** are adequate to ensure safety of PRoW users, whilst not having to resort to temporary PRoW closures. In relation to the impacts from noise and vibration nearby to bridleways, in addition to the amendments described above to the oPROWMP, the Applicant has updated Table 5.6 of the **oCEMP [REP1-032]** to provide additional control measures when works are happening in proximity to bridleways.
BHSB-WR-04	Although [redacted] did explain how being ridden on roads can be beneficial to young competition horses, leisure riders seek to avoid the roads wherever possible and only use them to make connections to and between off-road bridleways. Horses are powerful ‘flight’ animals that can become distressed by sudden noises or fast, large or close vehicles, leading to unpredictable movements and potentially accidents to themselves, riders and other road users. The Highway Code advises passing at no more than 10mph and with at least 2m of space (s215). Large vehicles such HGVs can be particularly daunting to a horse. These vehicles can be unfamiliar and intimidating to a	The Applicant recognises the concern raised, but considers that temporary interaction between construction traffic and horse riders is capable of being appropriately managed through standard controls, including prescribed routeing, driver induction and awareness, compliance with the Highway Code, speed management, and signage.

Ref.	Comments	Applicant Response
	horse as they are bigger than other vehicles, the noise may startle them, or the air brakes can cause alarm.	
BHSB-WR-05	Each of the country roads around Sites A and B is used by equestrians (and also by cyclists). There appears to be no effort made to minimise the use of these roads. There are three sections of road that are planned to be used by construction traffic, each roughly 1km, and in each case there is scope for an alternative safer option available within the development site: 1. All traffic between Sites C and B (so all deliveries etc for both Sites A and B – nearly 2,400 loads or 4,800 trips) will be directed via the narrow Great Staughton Road rather than on an internal access track along the line of or alongside the cable corridor between Site C and B. 2. Access to the southern and northern sections of Site B will use Green End Road – the volume of traffic is not easy to estimate but alternative internal tracks could be provided, requiring only a crossing of Green End. 3. Access to the very northern sections of Site B – those to the north of Great Staughton Road around Kangaroo – will use that road from the junction with Green End Road. Once again, internal routes could be used with just crossings of the road.	The Applicant has sought to minimise where possible use of the local highway as part of the construction access strategy. Where sections of public highway are required for the construction, operational and decommissioning phases of the Scheme the access will be provided safely, and by appropriate agreement with the local highway authorities.

5.6 Response to C Patel

Table 11: Response to C Patel Written Representation (REP1-101)

Ref.	Comments	Applicant Response
CP-WR-01	How should the proposed development be properly characterised in planning terms: as a renewable energy generating station, or as a hybrid scheme comprising solar generation and a commercially-operated battery trading asset?	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 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 Applicant notes that the majority of made solar DCOs have included BESS as associated development in this way, and the approach taken by the Applicant is therefore not unprecedented.
CP-WR-02	To what extent does the Application accurately reflect the actual operational behaviour of the scheme, particularly the independence of the BESS from on-site solar generation?	The Scheme is described in **ES Vol 1 Chapter 2 [APP-038]**. The BESS will be an integral element of the Scheme, used to store electricity generated by the solar PV modules at times of low demand from the National Grid and release the electricity at times of peak demand. BESSs are essential for renewable electricity generating systems such as wind and solar due to their weather dependency and the intermittent nature of their electricity generation.

Ref.	Comments	Applicant Response
		In addition to the BESS' function as an essential part of the Scheme, it will also be available to the National Grid for grid-balancing services. By importing excess electricity from the grid and storing it, the BESS can capture electricity that would otherwise be lost or unutilised. During situations when generating stations are interrupted, the BESS can bridge the gap in production, thus avoiding potential blackouts. It should be noted that the UK electricity network is interconnected and issues in one geographic location can have far reaching implications on the network. Accordingly, the BESS offers additional capacity to deal with system stress and any variations in grid frequency at both a local and national level.
CP-WR-03	What evidence demonstrates that the scheme would contribute meaningfully to a "secure and reliable" energy supply, given the seasonal and non-dispatchable nature of solar generation?	Government policy provides a firm mandate to deliver solar generation as part of a national effort to increase energy security. Section 2.4 of the **Planning Statement [APP-031]** provides context on this matter.
CP-WR-04	Has the Applicant quantified the scheme's electricity output during winter periods of peak demand, and if not, how can its contribution to energy security be assessed?	The Applicant has not specifically provided detail on the Scheme's electricity output during winter periods of peak demand, but nor does national policy require this. The Applicant has assessed the anticipated generation across a full year at paragraph 2.2.5 of **ES Vol 2 Appendix 15-1 [APP-116]**.
CP-WR-05	Given that battery storage operates over short durations and is driven by market signals, what assurance exists that it would be available during periods of system stress?	The BESS will be operated in line with the requirements of the Scheme. There is no statutory or policy requirement to provide an assurance that the BESS would be available during periods of system stress.

Ref.	Comments	Applicant Response
CP-WR-06	Can the scheme be said to meet EN-1 requirements where it does not deliver firm or dispatchable capacity?	National policy proceeds on the basis that substantial new renewable generation, including solar, is urgently required as part of the transition to a clean power system, notwithstanding that different technologies have different generation profiles.
CP-WR-07	On what evidential basis is the scheme described as “low-cost”, particularly where electricity pricing from the East Park installation would be influenced by battery trading and wholesale market conditions?	The description of the scheme as ‘low-cost’ is grounded in national policy and government evidence, not in any assumption about an electricity sale price. NPS EN-1 states at paragraph 3.3.20 that wind and solar are the lowest-cost ways of generating electricity, and the Government’s Solar Roadmap 2025 describes ground-mounted solar as one of the UK’s cheapest electricity sources to build and operate at scale.
CP-WR-08	Has the Applicant demonstrated that the scheme would reduce consumer costs or improve affordability, as required by EN-3?	NPS EN-3 does not impose a policy requirement for an applicant to demonstrate that an individual solar scheme will itself reduce consumer costs or improve affordability. NPS EN-3 states at paragraph 1.1.4 that more low-cost renewables on the system will reduce household electricity bills.
CP-WR-09	What proportion of electricity stored and exported by the BESS is expected to originate from grid imports rather than on-site solar generation?	The BESS will be operated in line with the requirements of the Scheme. There is no statutory or policy requirement to provide a breakdown of how the BESS will be utilised.
CP-WR-10	To what extent will the BESS store and re-export electricity derived from gas-fired generation, particularly during the periods of very low solar power output?	As above, the BESS will be operated in line with the requirements of the Scheme. There is no guarantee the BESS would be utilised for grid balancing services to the National Grid, and therefore the

Ref.	Comments	Applicant Response
		Applicant has not sought to quantify the extent to which it would provide this service. For the purpose of **ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [APP-116]**, the Applicant has assessed the embodied carbon involved in constructing the BESS and managing any replacements over the operational phase, but has not sought to quantify any reduction in carbon as a result of the operation of the BESS. It is nevertheless reasonable to expect that the BESS would support the integration of increasing volumes of renewable generation. This is because Government policy for Clean Power 2030 envisages a substantial expansion of renewable electricity, supported by flexibility and storage, with unabated gas expected to play a substantially reduced role in the electricity mix. In that context, the BESS would assist in storing and shifting electricity across periods of generation and demand, improving the utilisation of renewable generation and helping to reduce reliance on unabated gas.
CP-WR-11	How should the Examining Authority treat claims of decarbonisation where a significant element of the scheme involves trading grid electricity of mixed (including fossil) origin?	The Applicant has provided a response on this point when reading through the rows above.
CP-WR-12	Should greater weight be given to actual energy output and seasonal performance, rather than installed capacity, when assessing the scheme's benefits?	The Applicant's calculations in relation to the number of houses that could be powered by the Scheme, or the tonnes of CO_2 displaced (e.g. at paragraph 2.3.26 of the **Planning Statement [APP-031]**) are based on an estimate of the energy generated across a full year, and not purely on the installed capacity value. The Applicant has set out a statement of need for the Scheme at Section 2 of the **Planning Statement [APP-031]**.

Ref.	Comments	Applicant Response
CP-WR-13	In the absence of clear evidence of material contributions to energy security, affordability, or decarbonisation, what weight should be attributed to the scheme's claimed benefits?	The Applicant has set out a statement of need for the Scheme at Section 2 of the **Planning Statement [APP-031]**.
CP-WR-14	How should the planning balance be struck where the benefits are limited, uncertain, or overstated, and the harms are significant, long-term and irreversible?	The Applicant has set out its consideration of the planning balance for this application in Section 8 of the **Planning Statement [APP-031]**.

5.7 Response to Leslie Rant

Table 12: Response to Leslie Rant Written Representation (REP1-122)

Ref.	Comments	Applicant Response
LR-WR-01	Developers stated that the site had to be within 15km of the substation. Why would this be the case? Energy from wind farms is produced at distances significantly greater than this. Dogger bank is more than 100km from the shore. East Anglia1 offshore wind farm is less than 40km from the shore, but the power is exported to a substation ashore, 85km away. Currently we import energy from abroad, all these cables are much more than 15km. The Southampton to Caen power cable is 240km! If you look at a nautical chart you will see power cable all over the North Sea and English channel. Obviously, we can also see overhead power cables delivering energy all over the country. With modern technology a 15km limit is a ridiculous restraint regarding site to grid connections. This 15Km distance is a purely profit driven requirement.	The Applicant's justification for selecting a 15km area of search is set out in Section 3.3 of **ES Vol 2 Appendix 3-1: Site Identification Report [APP-058]**. There is no statutory or policy requirement to set an area of search based on a specific radius, it is a matter of judgement for the Applicant to decide in relation to the commercial feasibility of the development. The Applicant considers that the area of search was reasonable and proportionate. The Applicant notes that other consented solar NSIP developments (including Sunnica in the Cambridgeshire area) have used similar 15km areas of search. In addition, some projects have used smaller areas of search, such as the consented Helios Renewable Energy Project which has a generating capacity of 190 MW and considered a 5km area of search around its point of connection.

5.8 Response to Mrs M. T. Benford

Table 13: Response to Mrs M. T. Benford Written Representation (REP1-125)

Ref.	Comments	Applicant Response
MTB-WR-01	Request 1. Require definition, on the face of the DCO, of the operational envelope of the bidirectional connection, including any limits on grid import for BESS charging purposes.	The grid connection between the proposed East Park Substation and the point of connection at the Eaton Socon Substation is covered by Work No 4, as shown on the **Works Plan [APP-009]**. There is no statutory or policy requirement to provide any limit on the grid import for the BESS as part of the DCO.
MTB-WR-02	Request 2. Require a revised carbon assessment incorporating scope three emissions from grid-imported electricity stored and re-exported by the BESS, as required by EN-1's requirement for proper assessment of environmental impacts.	There is no guarantee the BESS would be utilised for grid balancing services to the National Grid, and therefore the Applicant has not sought to quantify the extent to which it would provide this service. For the purpose of **ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [APP-116]**, the Applicant has assessed the embodied carbon involved in constructing the BESS and managing any replacements over the operational phase, but has not sought to quantify any reduction in carbon as a result of the operation of the BESS. This therefore provides a reasonable worst-case assessment. It is nevertheless reasonable to expect that the BESS would support the integration of increasing volumes of renewable generation. This is because Government policy for Clean Power 2030 envisages a substantial expansion of renewable electricity, supported by flexibility and storage, with unabated gas expected to play a substantially reduced role in the electricity mix. In that context, the BESS would assist in storing and shifting electricity across periods of generation and demand, improving the utilisation of renewable generation and helping to reduce reliance on unabated gas.

Ref.	Comments	Applicant Response
MTB-WR-03	Request 3. Make a specific finding in the recommendation report on whether the absence of an operational envelope definition constitutes a material deficiency in the draft DCO.	The Applicant's opinion is there is no statutory or policy requirement to provide any limit on the grid import for the BESS as part of the DCO.
MTB-WR-04	The Examining Authority himself asked directly during the hearing: "Are you aware of any precedent in a made DCO that requires funding to be provided for decommissioning, either in an article or in a requirement?" The applicant's counsel could identify only one possible example — the Helios solar DCO — and undertook to confirm the position in writing. This question therefore remains live and unresolved on the examination record.	The Applicant has now provided a response to this point in relation to Action Point 2 in **Written Summary of Applicants Oral Submissions at Issue Specific Hearing 1 (ISH1) and Action Points [REP1-058]**.
MTB-WR-05	Request 4. Clarify and apply the Helios solar DCO precedent on funded decommissioning provision, as undertook by the applicant's counsel at the DCO hearing, and require equivalent or stronger provision in this DCO. Request 5. Require, as a necessary condition of any consent in order to satisfy EN-1 paragraphs 5.14.4. and 5.14.5, a fully funded, index-linked restoration bond held in independent escrow by a third party entirely separate from the developer and its parent companies, verified by an independent quantity surveyor appointed by the Examining Authority and not by the applicant, sufficient to cover complete removal of all infrastructure including panels, BESS installations, cabling, concrete foundations and access tracks, and full restoration of the land to its original Best and Most Versatile agricultural classification. The bond must be drawable not only at the planned end of the consented project life but at any point during the operational period at which the development becomes commercially unviable, the developer becomes insolvent, or the site is abandoned — circumstances which are foreseeable given	For the avoidance of doubt, the Applicant wishes to note that it is incorrect to state that the Applicant's counsel "undertook" to clarify and apply the decommissioning security provision included in the Helios Renewable Energy Project Order 2025 at Issue Specified Hearing 1. Instead, the Applicant agreed to take away an action to confirm whether previous solar DCOs have included provision for decommissioning securities, the details of this exercise being set out at Hearing Action Point 2 in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) and Action Points [REP1-058]**. The Applicant's position in relation to decommissioning security is also found at Hearing Action Point 2 of its written summary **[REP1-058]** and is reproduced below for reference. *'Sixteen solar DCOs have been granted to date. The Applicant has reviewed these DCOs. The Applicant has identified a single precedent that includes provisions for decommissioning security: The Helios Renewable Energy Project Order 2025 (the "Helios DCO").*

Ref.	Comments	Applicant Response
	the dependence of the project's financial model on subsidy mechanisms and grid trading revenues that are subject to policy change. The bond value should be subject to mandatory upward review at ten-year intervals throughout the consented project life to reflect inflation, changes in restoration costs, and any additional infrastructure installed on the site. In the absence of such provision, there is a material risk that regulatory or market changes rendering the project commercially unviable could result in a stranded industrial asset abandoned in open countryside, with no secured mechanism to restore the land and no entity with the financial means or legal obligation to do so.	*This included provisions at requirement 5(3) in Schedule 2, which provide that "No later than year 15 of operation the undertaker must notify the local planning authority that the undertaker has put in place the requisite decommissioning security in the form as required by the landowners." The term 'landowners' is not defined. The full requirement is set out below.* *Decommissioning and restoration* *5.—(1) Decommissioning works must commence no later than 40 years following the date of the final commissioning of Work No. 1 that is the subject of the last notice given by the undertaker pursuant to requirement 2(3) (phase of authorised development and date of final commissioning).* *(2) No later than 12 months prior to the commencement of any decommissioning works for any part of the authorised development, the undertaker must—* *(a) submit to the local planning authority for approval a decommissioning environmental management plan for that part; and* *(b) submit to the local planning authority for approval in consultation with National Highways (or its successors) a decommissioning traffic management plan for that part.* *(3) No later than year 15 of operation the undertaker must notify the local planning authority that the undertaker has put in place the requisite decommissioning security in the form as required by the landowners.* *(4) The plans submitted and approved under sub-paragraph (2) must be substantially in accordance with the relevant part of the outline DEMP.*

Ref.	Comments	Applicant Response
		(5) The decommissioning environmental management plan submitted and approved must include a resource management plan that includes details of proposals to minimise the use of natural resources and unnecessary materials. *(6) No decommissioning works must be carried out until the local planning authority approves the plans submitted in relation to such works are approved as set out on subparagraph (2).* *(7) The plans submitted to and approved pursuant to sub-paragraph (2) must be implemented as approved for the works required to decommission that phase of the authorised development unless otherwise approved in writing.* *(8) This requirement is without prejudice to any other consents or permissions which may be required to decommission any part of the authorised development. This drafting was put forward by the Helios applicant before the end of the Examination.* *It is not clear why the Secretary of State has departed from his consistent position on this question in the other 15 granted DCOs. There is no substantive discussion on the point in the decision letter (or the ExA's recommendation report).* *The Applicant's position remains that as restated at the hearing, namely that suitable decommissioning controls have been included in the DCO.* *Requirement 18 of Schedule 2 of the draft DCO [REF] addresses decommissioning and restoration. It is drafted to require that a final decommissioning environmental management plan and a final decommissioning traffic management plan are submitted and approved before any decommissioning activities take place for each phase. These final management plans must be substantially in accordance with their outline versions, which are proposed to be certified by the Secretary of State. However, they must also be submitted to, and approved by, the relevant local*

Ref.	Comments	Applicant Response
		planning authority, in consultation with the Environment Agency, to ensure an appropriate level of scrutiny at the time. The "substantially in accordance" requirement enables amendments at the point of decommissioning to secure measures that prove necessary at that time but may not have been envisaged at the point of submission. *Requirement 18 also provides that the decommissioning environmental management plan and decommissioning traffic management plan must be implemented as approved. Failure to comply with the terms of a made DCO is a breach of the Order and is enforceable through the statutory regime, including criminal liability for breach of the terms of an order granting development consent (section 161 of the Planning Act 2008). In those circumstances, the local planning authority may also seek an injunction to restrain such activities (section 171 of the Planning Act 2008).* *Accordingly, there is no reason to believe that the Applicant would fail to fulfil its decommissioning responsibilities as required by the draft DCO. For these reasons, the Applicant's position remains that requirement 18, as currently drafted, deals appropriately with decommissioning and restoration. This is consistent with the 15 other solar DCOs granted by the SoS already referred to.'* The Applicant's position is that the **draft DCO [REP1-005]** and **outline Decommissioning Environmental Management Plan (oDEMP) [REP1-038]** secure decommissioning and restoration in a clear and enforceable manner which is consistent with established practice on solar DCOs. The approach taken by the Applicant is also consistent with and well supported by policy. In particular, the Applicant has complied with all the following requirements of NPS EN-3:

Ref.	Comments	Applicant Response
		• Paragraph 2.10.146 on decommissioning, requires an Applicant to put forward outline plans for decommissioning; • Paragraph 2.10.147 provides that where the consent for a solar farm is to be time-limited, there should be a requirement in the DCO setting that time-limit from the date the solar farm starts to generate electricity; and • Paragraph 2.10.149 provides that the requirements should secure the actual decommissioning itself. It is also well-established that policy does not require a decommissioning bond or financial security for solar development as a matter of principle. This position was notably upheld by the Secretary of State in the decision on The Oaklands Farm Solar Park Order 2025, where the Secretary of State omitted the recommendation to include a decommissioning fund requirement. In doing so, the Secretary of State held that "*there is no policy requirement for a decommissioning fund to be imposed*", that "the Secretary of State does not consider that imposing a decommissioning fund requirement is necessary" and further that this approach "*is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed*." The Applicant's position, as set out Hearing Action Point 2 in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 (ISH1) and Action Points [REP1-058]** is that there is no precedent for the Secretary of State including decommissioning funding security in any solar DCO decisions and made Orders and further that the Secretary of State has consistently upheld that NPS EN-3 does not require a decommissioning bond. Further examples of this beyond the

Ref.	Comments	Applicant Response
		Oaklands Farm Solar Park Order 2025 include: Mallard Pass Solar Farm Order, Sunnica Energy Farm Order, and the Cleve Hill Solar Park Order (please note that the precedents cited by SEPE in Appendix M **[REP1-156]** do not include such provisions). In respect of the Sunnica Energy Farm Order, the Applicant notes that SEPE's representations state that the Recommendation Report for this Order "*required a fully funded decommissioning and environmental response bond*" and that this "*establishes clear precedent that financial security is an expected component of NSIP scale solar and solar and BESS schemes*". The Applicant has reviewed the Sunnica Recommendation Report and the relevant Order and does not agree that any such precedent was established. The Recommendation Report does not recommend a "*decommissioning or environmental response bond*", and no such requirement appears in the made Order. Lastly, the Applicant notes that the position of the Secretary of State on this issue has also been consistently upheld by Examining Authorities on solar DCOs where this point has been raised and considered during examination. This includes the Examining Authority for Stonestreet Green Solar, which expressly cited the Secretary of State's decision on the Oaklands Farm Solar Park Order 2025, noting that there is "*no policy requirement for a decommissioning fund to be imposed*" having regard to paragraphs 2.10.146 to 2.10.151 of NPS EN-3, observed (by reference to paragraph 2.10.68 of NPS EN 1) that "*solar panels can be decommissioned relatively easily and cheaply*", and applied the policy test in paragraph 4.1.16 of NPS EN-1 that requirements should only be imposed that are, inter alia, necessary and reasonable, before concluding that "*an additional Requirement is not necessary*".

Ref.	Comments	Applicant Response
		This was also recently confirmed by the Secretary of State in its decision to grant development consent for Springwell Solar DCO. The Secretary of State agreed with the position precedented in Oaklands Solar DCO and declined to include a requirement for a bond for a decommissioning fund within the DCO. This confirms that sufficient reliance and weight should be given to the controls available within the planning regime (notably the existence of offences for breach) which are sufficient protection to prevent abandonment of works. All of this, of course, emphasising that the Applicant does not seek compulsory acquisition powers over circa 92% of the land within the Order Limits and is, therefore, privately required to reinstate the Site upon decommissioning of the Scheme. For the reasons set out above, the Applicant strongly argues that these suggestions are not required and that the issues raised by SEPE are appropriately covered in the draft DCO as well as control documents read alongside and certified by the draft DCO.
MTB-WR-06	Request 6. Address the adequacy of the funding statement under Regulation 5(2)(h) of the Infrastructure Planning Regulations 2009 as formally challenged on the examination record during the DCO hearing, and make a specific finding in the recommendation report on whether the funding statement satisfies the statutory test.	Regulation 5(2)(h) of the Infrastructure Planning (Applications: Prescribed forms and Procedure) Regulations 2009 (the "APFP regulations") requires that where a proposed development consent order would authorise the compulsory acquisition of land or an interest in land or right over land, the application for development consent must be accompanied by "*a statement to indicate how an order that contains the authorisation of compulsory acquisition is proposed to be funded*". The Applicant considers that its **Funding Statement [PDA-009]** is compliant with Regulation 5(2)(h) of the APFP Regulations. In particular, section 4 of the Funding Statement provides a clear indication of how the Scheme is proposed to be funded, noting that if the DCO is granted the Applicant would seek further funding with the support of its legal and financial advisors and would consult with a variety of financial institutions and its

Ref.	Comments	Applicant Response
		investors to enable the construction, operation and decommissioning of the proposed development. It is noted that this is a common approach for privately funded infrastructure projects and solar developments, with similar positions being set out in the funding statements for Sunnica Energy Farm and Heckington Fen Solar Park.
MTB-WR-07	Request 7. In the event that the applicant cannot or will not provide a fully escrowed restoration bond on these terms, treat that refusal as material evidence that the developer does not have confidence in the project's long-term commercial viability, and address that inference explicitly in the recommendation report.	Please see the Applicant's response to MTB-WR-05 above regarding the Applicant's position regarding decommissioning security. The Applicant's obligations in relation to decommissioning are secured by way of Requirement 18 in Schedule 2 of the draft DCO which provides that the decommissioning environmental management plan and decommissioning traffic management plan must be implemented as approved. Failure to comply with the terms of a made DCO is a breach of the Order and is enforceable through the statutory regime, including criminal liability for breach of the terms of an order granting development consent (section 161 of the Planning Act 2008). In those circumstances, the local planning authority may also seek an injunction to restrain such activities (section 171 of the Planning Act 2008). In addition to this, the Applicant does not have full control over the land where the solar panels will be located and only has an option to lease. Individual option agreements with each of the affected landowners contain provisions for the decommissioning of the Scheme and restoration of the land to its current state. No one is better placed than the affected landowners to ensure that decommissioning is carried out to acceptable standards. The Applicant's approach is consistent with 16 of the 17 solar DCOs granted by the Secretary of State to date and should not

Ref.	Comments	Applicant Response
		be viewed as an indicator of the developer's confidence in the Scheme's long-term commercial viability.
MTB-WR-08	Request 8. Determine whether the development, as likely to operate in practice, satisfies EN-3 paragraph 2.6.1's requirement that it is the most appropriate means of achieving the stated objectives, taking into account the operational role of the BESS and the land-use proportionality question raised above.	The Applicant does not recognise paragraph 2.6.1 of NPS EN-3 as requiring the development to demonstrate it is the most appropriate means of achieving the stated objectives. Paragraph 2.6.1 deals with '*flexibility in the project details*'. The Applicant cannot find an alternative paragraph in NPS EN-1 or EN-3 that requires an applicant to demonstrate a proposal is the 'most appropriate means' of achieving the stated objectives.
MTB-WR-09	Request 9. Require the applicant to demonstrate, with reference to realistic UK capacity factors of 10 to 11% rather than nameplate capacity, that the national energy contribution claimed is proportionate to the permanent Best and Most Versatile agricultural land loss entailed.	The Applicant's calculations in relation to the number of houses that could be powered by the Scheme, or the tonnes of CO2 displaced (e.g. at paragraph 2.3.26 of the **Planning Statement [APP-031]**) are based on an estimate of the energy generated across a full year, and not purely on the installed capacity value. They are based on a suitable capacity factor that allows for factors such as solar irradiance, current and emerging panel technology, and overplanting to maximise generation (as set out in paragraph 5.6.6 of the **Design Approach Document [APP-034]**. The Applicant has set out its consideration of the planning balance for this application in Section 8 of the **Planning Statement [APP-031]**.
MTB-WR-10	Request 10. Make a specific finding in the recommendation report on whether the development, assessed on its realistic operational profile and the likely primary role of the BESS, satisfies the national need and land use tests in EN-1 and EN-3. Failure to address this specific request would, it is submitted, constitute a failure to have regard to material considerations arising directly from the National Policy Statements.	The Applicant has provided a robust, proportionate and adequate assessment of the likely significant effects of the Scheme in the ES. The Applicant notes that the BESS does not have a 'primary role' in the Scheme; it is associated development and this principle is well-established through multiple other made solar DCOs.

5.9 Response to Peter Mills

Table 14: Response to Peter Mills Written Representation (REP1-137 / REP1-138)

Ref.	Comments	Applicant Response
PM-WR-01	SA09 Can the applicant explain further the reasons for site access SA09 near Little Staughton Village. The access point has been placed in a dangerous position just past a bend and with limited long visibility of the road in both directions, also it has been proposed to be very close to Little Staughton village & houses. Why is it not sited further away from the village on straighter roads and also why widen the road impacting the view considerably when entering our village, potentially with impact to hedgerow/screening to widen the road, and provide access. Surely not a suitable location for safety reasons and to near the vicinity of the village.	Access SA09 has been used as it is the existing operational access to the fields in question, and there was no better alternative access identified. The **oCTMP [REP1-034]** includes a series of drawings, in Appendix D, showing the site access drawings and the associated temporary speed limit and traffic management measures that are set out within Articles 12, 17 and Schedule 8 of the Draft DCO. Junction visibility splays are indicated that correspond to either the posted speed limit or observed design speeds, and the reduced temporary speed limits that are proposed at the majority of the site accesses. The proposed access has been demonstrated through the Applicant's **Transport Assessment [APP-101]** to be safe.
PM-WR-02	Secondly would like to understand how the applicant would construct all the access points, specific detail like how much tree/hedge row would be lost to each one, how wide is the access proposed to be, what will be done to stop mud going on the road over 3yrs work, and which access points on the map are construction vs longer term. Impact statement: Views every time passing these points will show the swathes of panels across fields every time you come into green end Little Staughton and all other access points will be a similar dramatic impact on currently enjoyed scenic views, with little screening in a number of places if this is not carefully considered and details specifically stated up front.	As above, the **oCTMP [REP1-034]** includes a series of drawings, in Appendix D, showing the site access drawings. Table 2-32 of **ES Vol 1 Chapter 2 [APP-038]** sets out which accesses will be used for the construction, operation and decommissioning phases. Access SA09 would be used for each phase of the Scheme. The required vegetation clearance is best shown on **ES Vol 3 Figure 2-6 Indicative Vegetation Clearance [APP-126]**, supported by the description in Table 2-34 of **ES Vol 1 Chapter 2 [APP-038]**. Mitigation measures to control impacts such as mud at access points are set out in the **outline Construction Traffic**

Ref.	Comments	Applicant Response
	The solar panel development near St Neots, shows a depressing mud bath with signs and barriers, wide openings, this needs to be avoided in this application.	**Management Plan [REP1-034]** and the **outline Construction Environmental Management Plan [REP1-032]**. The visual impact of the Scheme is assessed in **ES Vol 1 Chapter 5 Landscape and Visual [APP-041]** which includes an assessment from Viewpoint 42 (see **ES Figure 5-4a [APP-129]** for location) located at Access SA09. Photographs and visualisations from this viewpoint are provided on **ES Figure 5-46a to 5-46m [APP-137]**.
PM-WR-03	Further issues need to be flagged to the planning inspector and highways department/council around drainage in the area of the proposed development and its knock-on impact due to the undulating landscape and type of soil, linked with very narrow country lanes, and in some cases insufficient ditches for increased water runoff. a) The absence of farmers being able to maintain channels through the soil underground (e.g. mole buster equipment) which helps drain water off some of the 1900 acres of land, would subject to permission being granted for this application be covered in panels and become a major concern, in that run off water into ditches (and likely mud/silt) would be irregular instead of a steady trickle through these channels, it would mean a mass run off of water as soon as rain occurs as a result of the umbrella created by the circa 700,000 panels, and no underground drainage performed by farmers any longer. The impact of point a) above would be: b) Excessive water run off flowing into ditches WHERE ditches exist, and due to the increased volume of water would not likely be able to cope, as many ditches have not been designed with great amounts capacity. Even the one pictured in (DR02 very large field ditch) Is flowing into another ditch (pics DR4 +DR6) that has very small capacity therefore has no substantial flow	The Applicant recognises the concern in relation to flood risk. The surface water drainage strategy presented in the **outline Surface Water Management Plan [REP1-046]** will manage runoff so that the development does not increase off-site flood risk. There would be a neutral or beneficial effect on on-site and off-site surface water flood risk.

Ref.	Comments	Applicant Response
	rate to take the increased volume of water, Additionally, sites without ditches or poorly maintained ones would just flow straight onto roads, as already occurred over many years but substantially worse, along with mixed sludge. c) Roads would become even more likely to be unpassable for road traffic due to deep flooding (as has occurred on this same stretch of road where pics are taken) and mud onto roads in numerous places. Already historically villages have been unable to get through to their destination or return to houses by car on many village roads due to flood levels and road closures in multiple locations, and that's without any additional water. d) Kimbolton river near the bend has constantly over flowed, if water from this development causes further problems Kimbolton may become cut off and children not get to Kimbolton school as it has only two directions of access in Kimbolton. Other flood spots are bridge in pictures at Great Staughton and near the Kangeroo junction (Pic BR01,BR02), and the brook running alongside houses in Staploe	
PM-WR-04	• Excess water flooding roads, along with the likelihood of mud being left on the road and large increased volumes of traffic due to construction, is a recipe for disaster for anyone using the surrounding network of minor roads, so serious safety issues exist. • Visibility along these unclassified class roads, and sharp bends is again a recipe for accidents to happen, these are country lanes not A class roads and are insufficient to support this development/volume of increased traffic. • Increased flooding is likely to further damage these small village roads, when winter comes and roads break down due to ice expansion especially when used by heavy traffic with	The surface water drainage strategy presented in the **outline Surface Water Management Plan [REP1-046]** will manage runoff so that the development does not increase off-site flood risk. There would be a neutral or beneficial effect on on-site and off-site surface water flood risk. Mitigation measures to control impacts such as mud at access points are set out in the **outline Construction Traffic Management Plan [REP1-034]** and the **outline Construction Environmental Management Plan [REP1-032]**. The **oCTMP [REP1-034]** includes a series of drawings, in Appendix D, showing the site access drawings and the associated temporary speed limit and traffic management

Ref.	Comments	Applicant Response
	increased weight volumes (e.g. heavy machinery/Substantial amount of Construction materials). Has funding for of any repair/road resurfacing costs over the 3 years development and afterwards due to the wear put on them, been allocated by highways agency/council/developer, and what about the serious impact to locals trying to use these narrow routes along with associated pot hole/ car damage? • Roads in the vicinity planned for this development are not at all in a good state of repair (see example pics), pot hole repairs in this country are already under financial stress and need billions spending to resolve the issue. Therefore, two issues exist, firstly the construction traffic generated by workers cars and lorries can only damage the roads further, or even cause an accident as they become substantially worse supporting this planning application project. Eventually if this is approved when completed in 3 years' time, it is likely to leave a legacy for highways department having to do substantial full-scale resurfacing on numerous roads that have been impacted for miles, putting a major cost on the government/public	measures that are set out within Articles 12, 17 and Schedule 8 of the Draft DCO. Junction visibility splays are indicated that correspond to either the posted speed limit or observed design speeds, and the reduced temporary speed limits that are proposed at the majority of the site accesses. The proposed access has been demonstrated through the Applicant's **Transport Assessment [APP-101]** to be safe. In relation to highway agreements, the Applicant is consulting with CCC in relation to protective provisions for the benefit of CCC as Local Highway Authority.
PM-WR-05	there is a flight hold route for Luton airport that circles round most of this area, with multiple flights day and night. Q is how would the glare off circa 700000 panels affect pilots flying, electrical interfearance of electricity with flight equipment, and also if a battery fire occurs and toxic impact goes into the air above for days/weeks whilst it burns out potentially, how would this affect the safety of any aircraft using this holding pattern, and also the impact to any flights using Luton airport ?	The Applicant has undertaken an assessment of aviation receptors within **ES Vol 2 Appendix 5-6 [REP1-016]** which concludes there would be no unacceptable impacts. The Applicant consulted with the CAA, NATS and the MoD during the pre-application stage. A list of all consultees at the statutory consultation is provided in **Appendix 4-1 of the Consultation Report [APP-027]**. Consultation responses from NATS and the MoD are set out in **Appendix 5-1 of the Consultation Report [APP-028]**, with no objections received. The CAA provided no comments during pre-application consultation.

5.10 Response to Phil Wayles

Table 15: Response to Phil Wayles Written Representation (REP1-139)

Ref.	Comments	Applicant Response
PW-WR-01	The Applicant's methodology comprised "a qualitative comparison" of the three Zones using these factors, which resulted in Zone B being the preferred site for the solar farm. [redacted] on behalf of the Applicant confirmed at the ISH that the BMV land classifications were determined through a Desk Study in 2022, Reconnaissance survey in 2023 and then discussed with Natural England in 2024. This questions the validity of the sequential test and in particular the validity of the ALC/BMV data used in the site selection process because this work happened before the desk study work according to [redacted].	There is no 'sequential test' requirement for BMV agricultural land within the EIA regulations, or within the designated energy NPSs. This principal was tested through the courts in *Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 2842 (Admin)*. The judge held that Planning Practice Guidance requires decision makers to consider whether the use of agricultural land has been shown to be necessary, whether poorer quality land has been preferred, and whether the scheme would allow continued agricultural use or biodiversity benefits. The guidance does not require an applicant to prove that every other possible site has first been ruled out, and it does not create the kind of strict sequential exercise that applies in other areas such as flood risk. NPS EN-3 pushes applicants toward previously developed and lower quality land where possible, and says that where agricultural land is necessary, poorer quality land should be preferred and the use of best and most versatile land avoided where possible. At the same time, NPS EN-3 also makes clear that ground mounted solar is not prohibited on best and most versatile land. NPS EN-3 states at paragraph 2.10.31 that "*Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land*". This is what the Applicant has transparently done as part of the **Site Identification Report [APP-058]**. A clear sequential approach was followed to rule out brownfield or previously developed land and demonstrate that agricultural land was necessary to meet the project objectives;

Ref.	Comments	Applicant Response
		and that once it was established that agricultural land was necessary, development was directed towards areas of land where best and most versatile land was less likely to occur – thus, poorer quality land was demonstrably preferred by the Applicant, whilst taking into account other factors (set out in NPS EN-3) which influence site selection. Had the Applicant not sought to prefer lower quality land, then it is possible that none of the 'Search Zones' identified in the **Site Identification Report [APP-058]** and shown clearly on Figure 6 of that document would have been identified – as set out at paragraph 5.4.2 of the **Site Identification Report [APP-058]**. The desk study work referenced during ISH2 was undertaken as part of land collation due diligence, rather than as part of the work on the initial site identification exercise.
PW-WR-02	The Applicant's approach failed to consider several other relevant crucial factors in the decision-making process, including: • Cultural Heritage • Landscape and Visual Effects • Ecology and Nature Conservation • Hydrology and Flood Risk • Traffic and Transport • Legacy The assessment of alternative sites may have resulted in a different outcome if all these factors had been considered.	These environmental constraints were originally considered as spatial constraints, as set out in Section 5.2 of the **Site Identification Report [APP-058]**. In the second stage of site identification, reported in **ES Vol 2 Appendix 3-2 Land Identification Report [APP-059]**, environmental factors including landscape and visual effects, the historic environment, ecology and nature conservation, and environmental legacy were considered in defining the site boundary.
PW-WR-03	The whole site selection and assessment process and decision to use the Eaton Socon substation as the Point of Connection	The Applicant has a connection agreement for a point of connection with the Eaton Socon Substation.

Ref.	Comments	Applicant Response
	fails to acknowledge the presence of the Little Barford substation as a reasonable alternative.	Following the widely publicised grid reform process undertaken by the National Energy System Operator (NESO) over the past few years, the Applicant received a 'Gate 2' generation connection offer to the Eaton Socon Substation which is 2030-aligned. This connection offer is not transferable to another point of connection, and is not speculative. The connection offer has always been for the Eaton Socon Substation, and that has therefore dictated the site selection process and consideration of alternatives. An alternative point of connection such as the Little Barford Power Station (which has been raised by SEPE as well as other Interested Parties) has therefore not been considered as it is not a viable alternative for this project. Paragraph 4.3.22 of NPS EN-1 is clear that "*the consideration of alternatives is to be proportionate and limited to alternatives that can meet the objectives of the proposed development*" [emphasis added]. An alternative point of connection to any other substation (including the Little Barford Power Station) would not meet the objectives of this project – such alternatives therefore do not need to be considered by the Applicant. It is acceptable for the assessment to focus on the point of connection that has been offered, and to assess the scheme on that basis. Such an approach was considered by the Secretary of State on the consented Gate Burton Energy Park NSIP – on that case, at paragraph 3.2.77 of the Examining Authority's Recommendation Report the ExA concluded that it is not an unreasonable starting point for an Applicant to take the agreed point of connection with the grid as a basis for considering alternatives. In *Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 2842 (Admin)*, the High Court upheld an approach in which proximity to an available grid connection point was treated as a primary

Ref.	Comments	Applicant Response
		site selection factor affecting viability, noting that a connection agreement had been secured. The Applicant contends there is no legal or national policy requirement to provide an '*Integrated Grid and Site Alternatives Assessment*' looking at theoretical alternative points of connection for the Scheme, as requested by SEPE and other Interested Parties.
PW-WR-04	The £35M electricity network upgrade project by UK Power Networks installed a new 132kV underground cable stretching 2.5km between the Little Barford and Eaton Socon substations. This project clearly shows the Applicant's perceived significant technical barriers for a Grid Connection to the site named Zone C could be overcome.	The Applicant's conclusion in relation to a grid connection between Zone C and the Eaton Socon Substation is set out at paragraph 6.2.6 of the **Site Identification Report [APP-058]**: "*Zone C is significantly constrained by the characteristics of the land between it and the Point of Connection. Any reasonably direct grid connection corridor would be required to cross the railway, the River Great Ouse, the A1 or A421, minerals working areas, and dispersed residential areas. The A428 Black Cat to Caxton Gibbet highway scheme is also expected to be built between Zone C and the Point of Connection. The grid connection corridor would likely result in significant environmental effects due to the nature of the intervening constraints, and be of a complexity that could affect commercial viability. This constraint is significant enough that Zone C is not considered a reasonable prospect, and should be discounted*." The Applicant maintains this was a reasonable conclusion, and in line with national policy as follows. Paragraph 2.10.24 of NPS EN-3 states that: "*the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network*[84] *can have a significant effect on the commercial feasibility of a development proposal*."

Ref.	Comments	Applicant Response
		Footnote 84 states: "*The route and type of terrain traversed by the cabling linking the solar project to the grid connection may also have an impact on the project's viability.*" Therefore, whilst UKPN may have been able to provide a network upgrade between the Eaton Socon Substation and the Little Barford Power Station out of necessity for the transmission and distribution network, and no doubt using their powers as a statutory undertaker, it was correct to rule it out for the purpose of a site identification exercise for the Scheme, and NPS EN-3 acknowledges this. The Applicant highlights anecdotal evidence[2] available online from a contractor appointed to deliver the connection on behalf of UKPN, which states: "*As complex goes, the Little Barford to Eaton Socon project had it all; an important river, a golf course, flood plains, two national trunk roads, and a large industrial estate to cross in addition to pipe string out restrictions. It was even once labelled as a project that 'could not be built' "*.
PW-WR-05	The Little Barford substation is much closer to Zone C and the ALC at this location is lower grade land than present in the Proposed Scheme. If Little Barford substation had been considered for the Point of Connection, then the Grid Connection factor for Zone C would also be appraised as "Green" rating using the Applicant's assessment criteria and methodology. Zone C would thus have a "Green" rating in every category and would be the preferred option. The appraisal fails to prioritise the use of poorer quality land.	As set out above, the point of connection for the project is the Eaton Socon Substation. This connection offer is not transferable to another point of connection, and is not speculative.

[2] https://www.mccormackdrilling.com/gas-drilling-barford

Ref.	Comments	Applicant Response
PW-WR-06	Significantly, the Point of Connection at the Eaton Socon substation appears to be an issue and is not secured. NGET's Relevant Representation says, "the substation is currently full and will require expansion, rebuild or provisions of a new substation to facilitate future connections (this includes the Project)". This questions the viability of the East Park Energy scheme.	Following the widely publicised grid reform process undertaken by the National Energy System Operator (NESO) over the past few years, the Applicant received a 'Gate 2' generation connection offer to the Eaton Socon Substation which is 2030-aligned. A Grid Connection Agreement is a firm obligation by National Grid Electricity Transmission (NGET) to enable the Applicant to connect the Scheme to the NGET Eaton Socon Substation. This is clearly defined and there are no uncertainties in respect of this and NGET is under a contractual obligation to ensure that the Scheme is connected to the substation. Due to planned upgrade works to the substation NGET has been unable to confirm the exact point of connection for the Scheme within its current substation to date; however, it will be necessary to connect the East Park Substation (Work No. 3) to the NGET Eaton Socon Substation via 400 kV cable (Work No. 4). This does not mean that the cable route between panel areas or from the Applicant's proposed onsite substation to NGET's substation is uncertain. The only uncertainty is in respect of the exact point of connection within NGET's substation and it represents a small proportion of the land the Applicant seeks to develop. This has no impact on the viability of the Scheme.
PW-WR-07	It remains unproven if the soil quality of the site when reinstated will achieve the same BMV land classification following decommissioning of the site.	The **oSMP [REP1-044]** secures a detailed soil management framework for construction, operation and decommissioning, including like-for-like stripping, segregation, storage and replacement of topsoil and subsoil, restoration of soils to the

Ref.	Comments	Applicant Response
	I am uncertain why the NFU have not been consulted not commented on this important policy matter.	same parcel, protection of field drainage, and monitoring to verify against pre-construction condition.
PW-WR-08	National Highways commented in their Relevant Representation about the ”significant volume of trips presented” at peak times and requested junction impact assessment to be undertaken, including for the A1/B645 junction. At the ISH, [redaction] behalf of the Applicant suggested that PICADY software would be used to model this junction. However, PICADY is not an appropriate tool for modelling the A1/B645 grade separated junction.	This is incorrect. The modelling software used to assess the potential impact on junction capacity at the A1 / B645 junction was JUNCTIONS 10. This comprises both the PICADY (priority junctions) and ARCADY (roundabouts) modules. The A1 / B645 junction effectively comprises a single priority junction and two mini roundabouts. The modelling software used is therefore appropriate for intended purpose in this case. National Highways has not raised any objections to the proposed methodology.
PW-WR-09	The Applicant’s construction traffic flows appear to be understated according to Relevant Representations and several speakers at the ISH, especially in relation to car sharing. National Highways stated in their Relevant Representation at Section 4.3.4 “… A car share assumption of 1.4 would result in a significant increase in the number of vehicles accessing the site, predominantly via the A1 junction with the B645“. [redacted] from National Highways restated this important comment at the ISH..	The Applicant has addressed this point at paragraphs 2.3.36-37 of the **Written Summary of Applicants Oral Submissions at Issue Specific Hearing 2 (ISH2) and Action Points [REP1-059]**, as well as at Action Point 7 of that document. This is also addressed in Section 3.0 of the **Technical Note on Impact on B645-A1 St Neots Junction [REP1-066]**.
PW-WR-10	I have significant concerns about the introduction of the satellite compound and access (reference SA09), permanent highways improvements, impact on FP4 where it is coincident with the access track in the vicinity of the Green End site entrance and extra generated traffic at Green End, Little Staughton. It is important to note that the site access points and satellite compound locations were not disclosed during the consultation process.	The site access points and construction compound locations were presented as part of the statutory consultation material, and are still visible as part of the Preliminary Environmental Information Report (PEIR) presented on the Applicant’s project website. Feedback on these components is also evident in the Applicant’s **Consultation Report and Appendices [APP-023 to APP-030]**. The construction compounds and site access points have been assessed as part of the EIA reported in the ES.

Ref.	Comments	Applicant Response
		The **outline Public Rights of Way Management Plan [REP1-042]** presents proposed mitigation measures in relation to FP4 at Little Staughton.
PW-WR-11	Many roads are already in a poor condition and unsuitable for HGVs indeed Cambridgeshire County Council has imposed 18T weight restrictions for the whole of their area to the west of the A1 as shown their Cambridgeshire Advisory Freight Map. This could result in more HGVs being routed via local Bedfordshire roads and villages.	CCC has advised with reference to CCC-RR-42 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]** that: "*Temporary weight restriction suspension would not be required as a weight restriction allows access to a property or development for access. In temporarily removing this weight restriction, it would open the area to non-construction related heavy vehicles allowing them to use the surrounding roads which the council would not support.*"
PW-WR-12	I am concerned about the impacts on protected species throughout the life of the project. This includes the impact on habitats/roosts, foraging and commuting routes for all protected species due to the construction of the solar panels, crossing points, accesses and visibility splays. Lengths of many hedgerows will need to be removed or trimmed back to provide the necessary visibility splays at access and crossing points. This concern was shared by on behalf of Bedford Borough Council at the ISH.	**ES Vol 1 Chapter 7 Ecology and Nature Conservation [APP-043]** provides an assessment of protected species. The Applicant has provided visibility splay drawings which at Appendix D of the **oCTMP [REP1-034]**. The required visibility splays would not involve the removal of any hedgerows, but could involve annual pruning of hedgerows should foliage grow out to obstruct visibility; this is covered in Section 5.4 of the oCTMP.
PW-WR-13	It is illogical to exclude the Little Staughton Airfield Solar, Manor Farm Solar Park, High Wood Solar and Bassmead Manor & Home Wood solar farms from the cumulative assessment.	The existing solar developments that are built and operational in the landscape are considered as part of the baseline for assessment. Developments that are consented, in planning or under construction are considered as part of the assessment of cumulative effects. The assessment of cumulative effects therefore includes for the existing solar farms, the proposed East Park Energy project, and other emerging developments. This is the correct approach to undertaking such an assessment.

5.11 Response to Shaun Michael Woodward

Table 16: Response to Shaun Michael Woodward Written Representation (REP1-150)

Ref.	Comments	Applicant Response
SMW-WR-01	My research shows that Bedfordshire has few sheep, about 20,000 spread over about 200 owners. Not surprising as the high proportion of BMV land here is best suited to arable crops. I note the applicant's intention to use sheep for grass management, providing a table of the number of sheep per hectare required to maintain a healthy grass level. EN010141 000081-7.7 Outline Landscape and Ecological Management Plan - 6.5.36 The figures in the table most relevant to Bedfordshire suggest 5.5 to 8 sheep per hectare would be needed for the task over 24 to 36 grazing weeks. To achieve this on the EPE site would therefore require 4224 to 6144 sheep, equivalent to almost one third of all sheep currently farmed in Bedfordshire requiring a distinct shift by landowners to sheep farming from arable with all that entails. I suggest this will never be enacted, and is included purely to enhance the applicant's 'green' credentials. I suggest using sheep extensively in lieu of mowing machinery should be made mandatory and watertight for the life of the site in the DOC if the claim is serious. For your information I calculate a single 3m wide mower will be need to travel 423Km to make a single cut between the solar rows (not including underneath them). If that's is realistically twice per year, it adds a significant addition to emission calculations over 40 years particularly when added to the 'in/out' movements required in addition to mow under the arrays and the final hand strimming around the estimated 250,000+ metal piling supports.	The Applicant disagrees that grazing is proposed purely to enhance the Scheme's green credentials. Grazing of solar farms is an established approach that benefits biodiversity, local livestock farmers, and provides cost savings to the Applicant / Site Operator. The Applicant has already had a number of expressions of interest from local livestock farmers and smallholders wishing to graze the solar panel areas, should the Scheme be consented. At this time, the Applicant sees no reason why these expressions of interest would not be followed up on, but does not have contracts in place. The **outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]** sets out how grazing would be undertaken (if it is) as part of landscape management operations, but it does not commit to a fixed or mandatory target for sheep grazing. The oLEMP does not rely on grazing alone, it also provides for mechanical cutting including an annual August cut. Grazing is a preferred management tool for its multiple benefits, but not a strict requirement. The requirement is that the grassland habitats are managed appropriately to reach the requisite target condition. The calculations presented that the Scheme would require between 4,224 and 6,144 sheep to graze are overstated, likely because sheep would only graze the enclosed and fenced solar panel areas, which have a total hectarage of approximately 446 hectares. The theoretical total number of sheep would therefore be between 2,453 and 3,568 (which the Applicant does not

Ref.	Comments	Applicant Response
		challenge is an improbable number). It is important to note that if grazing does occur then it would not occur over the whole Site simultaneously, and would be employed as part of a rotational habitat management approach, meaning sheep would not be in every solar panel field at all times. Thus, there would not be a requirement for circa 2,500 sheep. The Applicant notes that given there is no guarantee of grazing, it does not attribute any weight to this as a benefit of the Scheme, as set out in Table 3 in Section 8 of the **Planning Statement [APP-031]**.
SMW-WR-02	This reinforces the rising rate of organised solar crime, which the EPE scheme could attract to our community. It reinforces the points I made about the applicants ill-considered plans for security at the operational stage, using minimal inward facing CCTV, and floodlighting. I suggest this was in order to claim less disturbance to local people, wildlife and to minimise 'tracking' local people's movement. Without considerable security, the expansive nature of the site covering roads, footpaths and bridleways will render all rights of way as obvious entry point and target for thieves particularly at night, the mammal gates being easy points to wriggle through if large enough for a deer. The applicant's plans for lighting only the entry gate points to the site at the operational stage will not be enough. I believe to deter thieves will require a considerable number of floodlights across the site supported by intensive CCTV which will need to fully monitor footpaths, road verges and other rights of way. To be effective over 60 km of fence line, will require flood lights every 25 metres? which equates to over 2600 floodlights. High gantry mounted floodlights mounted centrally within solar compounds may allow a lesser number of more powerful lamps to be used but the structures would be very visible and the lighting would be intrusive. All options would pose an eyesore and further	The Scheme includes appropriate security measures such as perimeter fencing, controlled access arrangements, CCTV and other appropriate monitoring and alarm systems. These are normal features of a commercial solar development and are not unusual or exceptional in nature. The impacts of such infrastructure have been assessed within the ES. The Scheme does not include for 24/7 lighting and it has been assessed on that basis, e.g. at paragraphs 5.8.71-72 of **ES Vol 1 Chapter 5 [APP-041]**. The approach to lighting the Scheme is set out in **ES Vol 1 Chapter 2 [APP-038]**. Mitigation for lighting impacts during the construction phase is set out at paragraphs 4.1.30 to 4.1.33 of the **outline Construction Environmental Management Plan (oCEMP) [REP1-032]**, in addition to assessment-specific mitigation set out in the tables in Section 5 of the oCEMP. Mitigation for lighting impacts during the operational phase is set out at paragraphs 4.1.35 to 4.1.38 of the **outline Operational Environmental Management Plan (oOEMP) [REP1-036]**, in addition to assessment-specific mitigation set out in the tables in Section 5 of the oOEMP.

Ref.	Comments	Applicant Response
	industrialise the site. Sufficient CCTV cameras to provide proper security proffer a similar challenge, even if IR rated. My point is that effective floodlighting, which could be added after the DOC is issued will increase light pollution, and any CCTV guarding perimeters will impact heavily on resident's privacy, monitor of walkers, riders and cyclists whilst also potentially monitoring traffic movements of local people which is absolutely unacceptable. The applicant will argue this increased security is not required, but I suggest it will be applied for as retrospective planning after the first theft incident, unless the DOC is very specific that it cannot be added and a sensible unobtrusive security plan can be presented now. Increased security meausres also add to the emissions and carbon from manufacture and installation, plus energy costs to run such installations which should all be meticulously included in any GHG/Carbon calculations supporting the claims for 'green' credentials.	
SMW-WR-03	I am also very concerned with the applicant claims that all HGV traffic leaving the site will exit north on the A1, even those wishing to travel south. If implemented this presents a problem because the vehicles will either have to turn onto the Great North Rd via the very tight bend through Little Paxton, to join the A1 south on the (locally notorious) dangerous unsighted junction at the Little Paxton southbound exit. The junction has a tiny runway, is blind to traffic due to tree cover, and traffic on this stretch is travelling at 70mph, only seeing traffic from the junction very late. Please drive this section of road. (Please see map below).	The Applicant notes this comment. This condition was imposed by Cambridgeshire County Council to limit the impact on the residential area of Eaton Ford. It is considered that the A1 is a suitable standard of road to allow HGVs to turn round at the adjacent junctions to the north or south of St Neots.
SMW-WR-04	Alternatively, HGV drivers will be required to travel further north; miles to the roundabout at Buckden, a very major detour for them if driving south. The Buckden roundabout is also a	The Applicant notes this comment. This condition was imposed by Cambridgeshire County Council to limit the impact on the residential area of Eaton Ford. It is considered that the A1 is a

Ref.	Comments	Applicant Response
	bottleneck junction at many times of day. I respectfully suggest HGV drivers will simply ignore instructions and access the southbound carriageway south, via the mini-roundabouts at the Eaton Oak pub, in Crosshall (and near to Crosshall Infant School). Likewise, A1 southbound site traffic will use the same junction to exit rather than drive down to the Black Cat roundabout to turn in order to access the Eaton ford A1 junction from the northbound carriageway.	suitable standard of road to allow HGVs to turn round at the adjacent junctions to the north or south of St Neots.

5.12 Response to Timothy George Price

Table 17: Response to Timothy George Price Written Representation (REP1-160)

Ref.	Comments	Applicant Response
TGP-WR-01	The proposed scheme comprises multiple parcels of land spread across a wide area. This fragmented and inconsistent layout appears inefficient and unnecessarily disruptive. Having lived in the area for [redacted] years, I do not believe the scheme makes optimal use of available land. Instead, it appears that land has been selected based on individual landowners' preferences rather than through a coherent and efficient design strategy.	The Applicant's approach to identifying individual parcels of land within the search zone is set out in **ES Vol 2 Appendix 3-2 Land Identification Report [APP-059]**. The approach to mitigating impacts through the design process is then summarised within the **Design Approach Document [APP-034]** and annotated on **ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121]**.
TGP-WR-02	I believe the Planning Inspectorate should give serious consideration to alternative land at Crown Farm in Little Staughton. This land: • Lies closer to the A1 and the grid connection • Is further from residential properties • Would integrate effectively with existing and proposed solar developments at Little Staughton Airfield and Bushmead • Is controlled by a landowner already involved in the East Park scheme The use of Compulsory Purchase Orders should be considered where necessary to prevent selective land inclusion and to ensure the most suitable land is utilised.	The Applicant discounted this area early in the site identification process, as set out in **ES Vol 2 Appendix 3-1 Site Identification Report [APP-058]**, principally on the basis that all land in this area was provisionally grade 2 agricultural land and that national policy requires Applicant's to prefer development of lower quality land.

5.13 Response to Tracey Lynne Stokes

Table 18: Response to Tracey Lynne Stokes Written Representation (REP1-162)

Ref.	Comments	Applicant Response
TLS-WR-01	I believe the Scheme was designed as an investment strategy, between one of the founder directors of RNA Energy Ltd ('RNA'), bought by Brockwell, and one of the key farmers who put land forward for the Scheme. The explanation about the use of Best and Most Versatile ('BMV') land given by Brockwell at Issue Specific Hearing 2 (ISH2) was an attempt at ex post facto justification for the site selection. Brockwell did not select the site. I understand that there were unconsidered, better parcels of land in the Scheme's vicinity, which would have been more suitable and closer to the Eaton Socon sub-station ('ESSS'). Please ensure that Brockwell supplies an accurate, chronological summary explaining how and why the site was chosen by RNA and then endorsed by Brockwell, including evidence of all relevant correspondence.	In the UK, new energy infrastructure is ordinarily brought forward through private sector investment. That is a normal and necessary feature of how renewable electricity generation is financed and delivered, and does not of itself indicate any improper purpose or diminish the planning merits of the Scheme. The Applicant has set out the approach to site selection within **ES Vol 2 Appendix 3-1 Site Identification Report [APP-058]** and **ES Vol 2 Appendix 3-2 Land Identification Report [APP-059]**. As required by the EIA Regulations, the Applicant has set out the reasonable alternatives studied, as relevant to the Scheme and its specific characteristics, together with the main reasons for selecting the chosen option, including by reference to potential environmental effects. The Applicant is not required to disclose private commercial agreements and communications, and nor does the Applicant consider this is necessary in reaching a conclusion on the planning merits and environmental effects of the Scheme.
TLS-WR-02	Contrary to Brockwell's statement at ISH2, there are no reasonably justifiable technical requirements for the Scheme to be sited 15 km from ESSS – it would simply be cheaper. Other solar NSIP Schemes are proposed to be sited further away from their potential grid connection. Please ensure that Brockwell supplies all its and RNA's deliberations and correspondence in connection with the selection of the potential connection to ESSS, including why all alternatives were omitted. Note that the connection to ESSS is not secure and a third party, Eaton Socon	The Applicant's justification for selecting a 15km area of search is set out in Section 3.3 of **ES Vol 2 Appendix 3-1: Site Identification Report [APP-058]**. There is no statutory or policy requirement to set an area of search based on a specific radius, it is a matter of judgement for the Applicant to decide in relation to the commercial feasibility of the development. The Applicant considers that the area of search was reasonable and proportionate.

Ref.	Comments	Applicant Response
	Power Limited, has objected to Brockwell using its land to cable to ESSS (Representation 100020199).	The Applicant notes that other consented solar NSIP developments (including Sunnica in the Cambridgeshire area) have used similar 15km areas of search. In addition, some projects have used smaller areas of search, such as the consented Helios Renewable Energy Project which has a generating capacity of 190 MW and considered a 5km area of search around its point of connection. The Applicant has responded separately to Eaton Socon Power Limited's objection in Section 5.9 of the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.
TLS-WR-03	BESS provides short term energy storage (electricity cannot be stored for long) but lucrative energy arbitrage, as low-cost grid imported electricity (including gas generated) is resold at times of high demand and price. BESS is insufficiently regulated in the UK. Over time, the Scheme is highly likely to have issues with thermal runaway, toxic fumes and particulates being released, requiring evacuation zones. Water used to cool BESS is also likely to become toxic and may drain into local water courses and the local drinking water system. What experience, training or preparedness (including practical resources and finances) does Cambridgeshire Fire and Rescue have for such eventualities?	The Applicant disagrees that it is 'highly likely' that there would be issues with thermal runaway, toxic fumes and particulates being released. The Applicant recognises that fire risk is a legitimate concern, but considers that such an event is highly unlikely to occur. An **outline Battery Safety Management Plan [APP-162]** has been prepared which sets out design, mitigation and control measures for the BESS to mitigate this risk as far as reasonably practicable. The plan sets out matters relating to avoiding fires, controlling fires should they occur, and drainage requirements. The Applicant is consulting with the fire service in relation to fire training and preparedness. There are also commitments within the environmental management plans to prepare an 'Emergency Response Plan' alongside the fire service to cover such eventualities.
TLS-WR-04	This Scheme may not be viable. It would require Scheduled Monument Consent to dig connections from the solar infrastructure to the BESS under/on Site C (and then to ESSS),	The Applicant has consulted with Historic England regarding the necessary consents and method statements in relation to the scheduled monument. Historic England has confirmed

Ref.	Comments	Applicant Response
	which is unacceptable. On 27th March 2025 in Great Staughton School, [redacted] of AOC Archaeology Group, which did the excavations, said this SRT was the most exciting find of his career, 'people jumped out of their seats when they were shown it' and that the modern plough soil is just 0.3m above the surface of the remains, but shallower on inclines. The Scheme could harm the remains.	(paragraph 4.5, **[REP1-079]**) that they are satisfied with the overall approach, and have no objection to the **draft DCO [REP1-005]** granting development consent for the work to the scheduled monument.

5.14 Response to William Scurry

Table 19: Response to William Scurry Written Representation (REP1-168)

Ref.	Comments	Applicant Response
WS-WR-01	However, on some occasions I cannot go this way because the run-off surface water from the field opposite the small sewage works at Pertenhall and the Keysoe Brook has flooded the road. In a large 4x4 it may be passable, but in my Ford Focus or on my bike, not. (See Appendix 1, photos 1 and 2 below for the evidence).	The Applicant recognises these concerns, however these are an existing flood risk issue. The surface water drainage strategy presented in the **outline Surface Water Management Plan [REP1-046]** will manage runoff so that the development does not increase off-site flood risk. There would be a neutral or beneficial effect on on-site and off-site surface water flood risk. The Scheme would therefore not make this existing situation worse.
WS-WR-02	The Keysoe Brook that runs past my house floods when we have heavy rain. The current flood plain is in the field (within Site B) to the northeast side [redacted] the footpath that runs to the Great Staughton Road. The footpath is just passable after a big rain fall. Most of the area flooded is where B&K no. 36 footpath meets BK no.13 footpath. (Appendix 1 photos 3 and 4.)	
WS-WR-03	So, historically, the Keysoe Brook and streams around Site A and B do flood. This is not referenced by the no doubt expensive experts paid by the developer to produce their many reports on flooding. I have read the 6 documents submitted by the developer about drainage and flood risk. All 236 pages. The experts say that the flooding risk is small and mitigated by planting grass under the panels that will soak up any water and stop any flooding. Also, raising the height of panels where there may be surface water standing after rain will stop the panels getting wet! This low risk is not the real-life position as the locals know too well.	**ES Vol 2 Appendix 8-1 Flood Risk Assessment [AS-018]** does acknowledge that the Keysoe Brook (Site B) and Pertenhall Brook (Site A) currently flood, either as a result of fluvial or pluvial flood risk. This is shown for example on **Figures 4a, 4b, 5a, 6a, 7a, 8a, and 9a [AS-018]**. The Applicant has designed around the areas of flood risk, informed by flood modelling and allowing for future increases in rainfall as a result of predicted climate change.
WS-WR-04	My concern is that when this Bedfordshire countryside is covered with so many solar panels the ground directly under them will be	The surface water drainage strategy presented in the **outline Surface Water Management Plan [REP1-046]** will manage

Ref.	Comments	Applicant Response
	shaded from the rain, so in the gaps between the panels, the water will saturate the land and water landing on the panels will surge flow to the waterways and across the roads at a higher rate than currently, vastly increasing the chance of flooding.	runoff so that the development does not increase off-site flood risk. There would be a neutral or beneficial effect on on-site and off-site surface water flood risk.