EAST PARK ENERGY

East Park Energy

EN010141

Applicant's Response to Deadline 2 Submissions – Other Interested Parties

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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(q)

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CONTENTS

1.0 INTRODUCTION

1.1 Overview

1.1.1 This document sets out the responses of BSSL Cambsbed 1 Limited ('the Applicant') to Deadline 2 submissions submitted by Interested Parties in relation to the Development Consent Order (DCO) application for the East Park Energy project (the 'Scheme').

1.1.2 The documents submitted with the application and at previous examination deadlines 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 3, this response document sets out that the relevant updated document is "**[as updated alongside this submission]**".

1.1.3 In preparing this document, the Applicant has sought to avoid repeating points made in other submissions 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 interested party 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.

1.1.4 Accordingly, whilst the Applicant has considered all submissions made at Deadline 2, the Applicant has only responded to a selection and has not responded to every individual submission.

1.2 Note about National Policy Statements

1.2.1 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.

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

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

2.0 RESPONSE TO OTHER INTERESTED PARTIES

2.1 Response to British Horse Society – Bedfordshire

Table 1: Response to British Horse Society - Bedfordshire Deadline 2 Submission (REP2-061)

Our Ref.	BHSC Comments	Applicant Response
BHSB-D2-01	Further the definition of 'anti-social behaviour' covers a wide range of things from rowdy parties to inconsiderate parking to damage to property. None of these would justify the closure of a bridleway as the host Council's rights of way team are well used to handling such issues. Any closure would have to be with the Council's agreement and subject to the TRO legislation.	The Applicant has updated paragraph 5.3.45 of the **oLEMP [as updated alongside this submission]** to provide additional detail.
BHSB-D2-02	It is noted that the current site visit itinerary does not extend along BW37 but stops not long after the intersection with BW40. The Society will comment on the proposed itinerary but considers that it is vital that the ExA should experience the full length of the bridleway and the views to fully understand the Society's point. This bridleway can be accessed by vehicle, being a hard farm track.	The Applicant notes this comment and would have no objection to the ExA extending the inspection along this section of bridleway when and if the ExA issues an itinerary for an Accompanied Site Inspection.
BHSB-D2-03	Regarding Pertenhall BW2, the proposal (in the updated oPROWMP at para 6.4.5) is that drivers will be instructed to maintain a 50m separation from any horses or riders. If they are behind a horse, they will maintain that 50m	The Applicant has based the suggested 50m offset on the British Horse Society's Advice on Construction Sites and Horses[1] which states: "*A machine making a movement is more of a threat than one that is still, although even a still machine where there has not been one before may*

[1] https://www.bhs.org.uk/media/kvbajook/construction-sites-0824.pdf

Our Ref.	BHSC Comments	Applicant Response
	separation as long as the horse is there. On the face of it, that sounds reasonable but it fails to understand that flight instinct of a horse and the relative size of an HGV. The horse may well feel that it is being 'stalked' and seek to escape by bolting. In the event that the ExA is inclined to accept this approach despite our objection to it, then a separation of 100m would be required. If the horse is approaching, they will stop when 50m from the approaching horse. This could mean that an HGV will stop at one of the pinch points, such as by the ditch, and the rider will have to squeeze past. If the air brakes should go off at the relevant time then there is every chance of the horse and rider ending up in the ditch. I have confirmed with a haulier that the driver has no control over air brakes and they can go off at any time, even when the engine is switched off. Both require the cooperation and awareness of the drivers; it is acknowledged that warning signage is proposed. A banksman at the top of the access track from the road might be able to stop HGVs arriving if he saw a horse on the route. This may well not be the case for vehicles exiting from the construction compound. Our concerns about the impact of construction traffic are not assuaged by the fact that there will be 5 HGV one way trips a day – so 10 movements. There will also be other traffic on the bridleways – this table below is from APP-045 and shows a max number of vehicles of 45 one-way trips so 90 movements. Further, it only takes one to create a safety incident.	*unsettle some horses. Operators must be able to shut off machinery or to stop movement and noise while horses pass and avoid starting up a machine or initiating movement while horses are in range.* *Machinery or activity should not resume until horses are at least twenty metres past. If it is not possible for activity to be halted, staff should be at the location to warn approaching equestrians as appropriate. Such 'sentries' should be obvious on approach, not hidden behind a tree or equipment as suddenly appearing could be an additional stress factor causing a horse to react.* *If a horse appears distressed—freezes, jerks sideways, prances about, takes flight, spins round or shies away or acts in any way other than a calm forward motion—or an equestrian appears to be struggling for control, or shouts, all movement and noise should cease immediately to avoid escalating the situation.* *Activity should not resume unless the equestrian indicates that it is safe to do so or is out of sight or **more than fifty metres away**."* The Applicant has updated the **oPRoWMP [as updated alongside this submission]** to make it clearer that the gap must be minimum 50m, but that drivers should increase this to 100m where visibility allows. The Applicant recognises that horses can be sensitive to sudden noise and movement. The measures in paragraph 6.4.6 **[REP1-042]** are intended to reduce that risk by preventing close interaction between HGVs and equestrian users. Equestrian users would be given right of way, HGVs must maintain or stop at a minimum 50m separation distance, and 50m marker posts would be installed to assist drivers in judging that distance. Warning signage would also be provided for both PRoW users and drivers, and banksmen may be deployed during periods of intense construction activity. The use of airbrakes cannot be eliminated entirely, as they form part of normal HGV operation, but drivers would be briefed to proceed cautiously, avoid unnecessary harsh braking or sudden movements near equestrian users, and

Our Ref.	BHSC Comments	Applicant Response
	Table 9.15: Forecast Daily Construction Vehicle Trip Generation (One-Way Deliveries) <table><tr><th rowspan="2">Area</th><th colspan="6">Scenario</th></tr><tr><th colspan="2">Max HGVs</th><th colspan="2">Max Staff</th><th colspan="2">Average</th></tr><tr><th>HGVs</th><th>LGVs</th><th>HGVs</th><th>LGVs</th><th>HGVs</th><th>LGVs</th></tr><tr><td>Site D</td><td>30</td><td>26</td><td>12</td><td>430</td><td>8</td><td>249</td></tr><tr><td>Site C</td><td>4</td><td>3</td><td>2</td><td>39</td><td>1</td><td>6</td></tr><tr><td>Site B</td><td>8</td><td>2</td><td>3</td><td>75</td><td>3</td><td>16</td></tr><tr><td>Site A</td><td>5</td><td>1</td><td>2</td><td>37</td><td>1</td><td>7</td></tr><tr><td>Grid Connection</td><td>3</td><td>0</td><td>2</td><td>5</td><td>1</td><td>0</td></tr></table> The BHS is still of the view that the arrangements for BW26 are not safe and since there is a much safer alternative route available, albeit outside the red line of the Order limit but in common ownership, they are totally unacceptable. I would remind the Applicant that the BHS's guidance on Solar Farms (https://www.bhs.org.uk/media/5f0llz3t/solar-0825.pdf) states quite categorically that "Bridleways, byways and unsurfaced roads should not be used for site access."	comply with the signed controls. Monitoring would be secured through the final PROWMP, which must include procedures for monitoring, inspection, reporting, staff briefing, stakeholder communication and responding to PRoW user queries. Complaints and perceived safety issues would be logged, reviewed and subject to corrective action where necessary. The Applicant recognises the concerns of the BHS but maintains that the measures proposed within the oPRoWMP will adequately ensure safety of all PRoW users, whilst providing a proportionate approach. With regard to the traffic movements quoted from APP-045, this may be misleading as the maximum number of HGVs and LGVs would not occur contemporaneously with the maximum number of staff movements. Furthermore, not all movements to Site A would route along the bridleways. 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 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 [as updated alongside this submission] are adequate to ensure safety of PRoW users, whilst not having to resort to temporary PRoW closures. With regard to the BHS's quotation from their own (non-statutory) Guidance on Solar Farms, the quote provided by the BHS omits the full context of the paragraph of that guidance. The full paragraph of the guidance states *"Bridleways, byways and unsurfaced roads should not be used for site access. If it is unavoidable, and accepted by the highway authority's rights of way service, in consultation with the BHS, every effort should be made to ensure that the surface will be maintained and restored to a surface material suitable for horses after construction of the solar farm.*

Our Ref.	BHSC Comments	Applicant Response
		The BHS's assertion that bridleways should categorically not be used for access is therefore inaccurate.
BHSB-D2-04	Regarding Bolnhurst & Keysoe BW37, the same points regarding separation distance from construction traffic apply. But we also listed two other concerns, which we also consider have not been adequately addressed: • The noise and vibration from the installation of the arrays alongside the bridleway • The cable laying along 1,340m between SW2-1 and SW2-2 (on sheets 1 and 2 of the street works plan) Noise and vibration Table 5.6 of the updated oCEMP purports to address the concern about noise and vibration: Where construction activities or construction traffic operate in close proximity to bridleways or other PRoW suitable for equestrian use, the Principal Contractor will, through the Construction Noise Management Plan (CNMP), implement measures requiring advance warning signage and instructions to drivers and banksmen to stop and hold plant and vehicle movements when horses are passing (in accordance with the final oPROWMP), and to pause or reduce non-essential noisy activities (particularly impulsive or intermittent sources) until the equestrian user has cleared the immediate works interface, applying best practicable measures in accordance with BS 5228. This approach is just not credible. How is the Principal Contractor going to be able to achieve this in the moments between when a horse is spotted on the bridleway and the horse is alongside the noise source? Further, a rider approaching from the western end of BW37 through the	The Applicant does not accept the British Horse Society's assertion that the measures in Table 5.6 of the **oCEMP [REP1-032]** are not credible, or impractical. That criticism considers the wording in isolation and overlooks the layered control regime secured through the **oCEMP [REP1-032]**, the **oPRoWMP [REP1-042]**, the CNMP (which will form part of the final CEMP), and the **oCTMP [REP1-034]** and the final approved management plans. The equestrian measures are not intended to rely on a horse being spotted at the last possible moment and a shouted instruction then being passed to operatives. They form part of a proactive, route-specific management system, to be finalised before construction, approved through the requirements in the draft DCO, briefed to drivers and site operatives, and implemented through pre-planned signage, segregation, banksmen, method statements, communication protocols and monitoring. The oPRoWMP is a control document secured through Requirement 11 of the **draft DCO [REP1-005]**. It requires a final PRoWMP to be prepared prior to construction, in substantial accordance with the outline document, and its purpose is expressly to ensure that affected PRoW remain safe throughout the construction and operational phases. The oPRoWMP sets out a hierarchy of measures, from keeping routes open with signage and managed crossing points, through managed short closures, to full temporary closures with diversion routes where necessary. Paragraph 5.1.3 of the **oPRoWMP [REP1-042]** makes clear that the final PROWMP will be informed, where required, by PRoW usage surveys and that alternative approaches to PRoW management can be developed at detailed design stage and agreed with the relevant authority. The criticism that operatives may be wearing ear defenders misunderstands how construction management controls would be implemented. The measure is not dependent on a shouted instruction being heard by an operative already engaged in a task. The final PRoWMP must include team roles and

Our Ref.	BHSC Comments	Applicant Response
	spinney will be alongside the array before anyone can spot them. And in practice, how is the instruction to stop work to be conveyed to the workers, no doubt wearing ear defenders and wholly focussed on the task in hand? This is just impractical. It is noted also that only 'non-essential noisy activities' are to be ceased which clearly implies that there will be ongoing noise from activity deemed to be 'essential'. And indeed what is 'noisy'? – our concern related to both noise and vibration.	responsibilities, monitoring, inspection and reporting procedures, a communication strategy, training and briefing arrangements, arrangements to advise personnel of changes as works progress, and procedures for emergencies affecting PRoW. The final PRoWMP can therefore specify the practical communication method to be used at relevant work fronts once a contractor is appointed, including, where appropriate, radios, visual signals, banksman-controlled hold points, and pre-agreed procedures for pausing plant or vehicle movements before an equestrian user reaches the immediate works interface. The Applicant would also note that the test is not whether the Applicant must create a construction environment in which no horse could ever be startled by any noise, vibration, movement or visual stimulus, as the safe use of a bridleway is necessarily a two-way matter. Works within, across or adjacent to public rights of way, including bridleways are not unique to this Scheme. Bridleways routinely pass along or across farm tracks, working agricultural land, working yards, roads, and other locations where vehicles, machinery and intermittent operational activity may be present. The test on the Applicant is not to ensure that all stimuli can be removed, but instead ensure the foreseeable risks can be appropriately controlled through a proportionate and enforceable management regime. The Applicant's framework of environmental management plans have collectively been prepared to manage the foreseeable risks in a proportionate and enforceable regime. The **oPRoWMP [REP1-042]** provides for a temporary field-edge diversion, temporary fencing to segregate PRoW users from construction traffic, warning signage, driver instructions to stop when horses are passing, 50m separation from HGVs, and 50m marker posts to assist drivers in judging that separation. It also requires signage and information at PRoW interfaces so that users are made aware of management procedures, and requires PRoW procedures to be included in site safety briefings for site personnel. The Construction Noise Management Plan secured through the **outline Construction Environmental Management Plan (oCEMP) [REP2-028]** then adds further controls in relation to noise and

Our Ref.	BHSC Comments	Applicant Response
		vibration, including best practicable measures under BS 5228 and the pausing or reduction of non-essential noisy activities at the immediate works interface where equestrian users are passing. The Applicant can provide (and has committed to provide) a managed interface, but equestrian users also remain responsible for riding with due care on the public highway (which includes bridleways), following lawful signage and directions, and taking account of the temperament and suitability of the horse they choose to ride through a working rural environment. This does not transfer the Applicant's responsibilities to riders; rather, it reflects the practical reality that safe passage depends on both an appropriately managed construction interface and PRoW users complying with the temporary management measures put in place for their safety.
BHSB-D2-05	Regarding the cabling, paragraph 6.8.7 states that PRoW users would be required to follow a localised diversion (in the order of a few metres either side of the existing PRoW alignment) around the works site. A 'few metres' is just not enough space for equestrians. Of course, if the construction activity has genuinely been ceased as the oCEMP envisages than that might be adequate BUT as explained above I do not consider that proposal to be credible – a horse and rider on BW37 will not, in my view, be noted in time for the stop order to be conveyed to the workmen laying the cable to be directed to stop. The Society remains of the view that the only safe option here is to provide an alternative diversion further away from the construction traffic and activity. This is within the gift of one of the landowners who is benefitting from this	The reference to a localised diversion "in the order of a few metres" relates to short-term cabling works in narrow sections, where the works area would be protected by temporary fencing. As set out in the row above, the **oPRoWMP [REP1-042]** also already provides wider controls for BW37, including a field-edge diversion, temporary fencing, warning signage, driver instructions to stop when horses are passing, 50m HGV separation, and 50m marker posts. The final PRoWMP will be approved before construction and can refine the width, alignment, timing and management of any localised diversion. The Applicant acknowledges the importance of safe and inclusive access, including for vulnerable users. However, this does not justify assuming that only a remote off-site diversion can be safe. The secured management framework is capable of maintaining safe equestrian passage where practicable.

Our Ref.	BHSC Comments	Applicant Response
	development. To continue with the current proposals is to close the bridleway to equestrian users during construction hours, without acknowledging that this is the case. I would like to remind you that one of the riders affected by this effective closure is the disabled child I described at the Open Floor Hearing (the details have been redacted though he is not identified and his mother has consented to the wording being used in a public forum).	
BHSB-D2-06	Regarding Bolnhurst & Keysoe BW40, our RR noted that the arrangements for Bolnhurst & Keysoe BW40 where it crosses BW37 need to be carefully reviewed. It seems to the Society that there will be a need for a banksman at that point whenever there is traffic on BW37, works going on the adjacent arrays or cabling being installed along BW37. The oPROWMP does include at 6.9.3 provision for a banksman at this crossing BUT only "during periods of intense construction activity" … "to marshal vehicle movements along the intersection". This is inadequate – not least because 'intense' is a judgemental issue but also because, as noted above, it only takes one incident to create a safety issue. The role is stated to be only for the marshalling of traffic but, in the event that the ExA accepts the proposal in Table 5.6 that the Principal Contractor will cease non-essential noisy activity, when horses are passing, this banksman position would be critical, not only for the safety of horses on BW37 but also on BW40 who will also pass close to array installation as they approach this junction.	The Applicant does not accept the British Horse Society's assertion that the proposed management of the Bolnhurst and Keysoe BW40 / BW37 interface is undeliverable or not credible. The comment again approaches the **oPRoWMP [REP1-042]** as though it relies on a single, reactive instruction at the point a horse is already alongside construction activity. That is not the basis of the Applicant's approach. The oPRoWMP has an overarching purpose to ensure that affected PRoW remain safe. It will be developed into a final PRoWMP prior to construction, in substantial accordance with the outline document, and implemented alongside the final CEMP, CTMP and CNMP. The Applicant also does not accept that a banksman must be present at the BW40 / BW37 crossing whenever there is any traffic anywhere on BW37, or whenever works are taking place adjacent to any part of BW37. That would be disproportionate and would not reflect the actual risk interface. The Applicant has, however, clarified the wording of paragraph 6.9.3 of the **oPRoWMP [as updated alongside this submission]** so that the trigger for banksman provision is not framed solely by the phrase "periods of intense construction activity". Instead it is set out that this will be by reference to the detailed construction programme, including periods when construction vehicles are crossing BW40 at Point 8, when cabling works or a localised diversion are in place at or near the crossing, or when other construction activities in the

Our Ref.	BHSC Comments	Applicant Response
	The banksman will not be able to see the full length of BW37 from that position, nor will he be able to see horses arriving from the north on BW40 until they are within the development. And again, the question remains about how the instruction to stop work, in the event that the horse was seen in time, would be passed to the workers, wearing ear defenders and focussed on their task. If this approach is to be adopted and the ExA is able to satisfy himself that the inherent communication issues can be addressed, there would be a need to individual 'spotters' to be positioned at the western end of BW37 (or even a bit before that – outside the Order limits) and down BW40 to the north, who together with the banksman at the access road near the farm (who can see horses heading west on the BW) and the one at the crossing who can see horses approaching on BW40 from the south. We consider the Applicant's proposals undeliverable in terms of creating a safe environment for equestrian users of these bridleways. They are just not credible. So, we continue to press for the provision of a safe alternative diversion for BW26 and BW37. This is within the gift of one of the landowners who is benefitting from this development. To continue with the current proposals is to close the bridleway to equestrian users during construction hours, without acknowledging that this is the case. We do however acknowledge that it is probably not possible to provide a safe diversion route for the northern part of BW40 (as we understand that the land that would be required for such a diversion is in different ownership). This BW does not suffer from the traffic or cabling	immediate vicinity of the crossing require active management to maintain safe equestrian passage. In relation to the northern part of BW40, the Applicant notes the BHS suggestion that the route should be closed while works take place immediately alongside. The Applicant does not accept that an automatic closure is necessary for all adjacent works. However, the Applicant agrees that the final PRoWMP should consider whether short, managed closures are required during specific works immediately adjoining BW40, particularly where the detailed construction method, proximity of plant, noise or visibility means that safe equestrian passage cannot be maintained through signage, segregation, banksman control and communication protocols. Any such closure would be agreed with the Local Highway Authority in advance, minimised in duration, linked to the relevant activity, and accompanied by advance signage at appropriate decision points, including the road south of Swineshead and the BW37 crossing where relevant.

Our Ref.	BHSC Comments	Applicant Response
	concerns of BW37 but does have two sets of arrays immediately alongside, both roughly 200m in length. The Society would advise that it would be wise to close the BW whilst work is taking place immediately alongside BUT that this closure should be minimised in duration, and that the detailed works scheduling should seek to ensure that that is the case. Notices should be placed at the road south of Swineshead and at the crossing of BW37 when that route is closed.	
BHSB-D2-07	Regarding point 3: The proximity of construction traffic and work to the paddocks of Lodge Farm, Green End, Little Staughton Table 5.6 of the oCEMP contains provisions to limit the impact of construction on the horses at this equestrian property. arrangements. [redacted] will no doubt comment on the adequacy of these arrangements. I note that it is stated that the "The additional mitigation measures follow standing guidance from the British Horse Society (BHS) in this regard". I would ask that the Applicant shares the source of this guidance with me, as the author of our guidance notes does not recognise this advice.	This relates to the Applicant's interpretation of the British Horse Society's *Advice on Construction Sites and Horses*[2] which as noted in the response above to BHSB-D2-03 states that "*Activity should not resume unless the equestrian indicates that it is safe to do so or is out of sight or more than fifty metres away*". The Applicant is proposing a 100m 'equestrian sensitivity zone' as set out in Table 5.6 of the **oCEMP [REP1-032]**, which the Applicant considers to follow the above standing guidance from the BHS, being more than 50m.
BHSB-D2-08	Regarding point 4: The use of roads also used by equestrians for construction traffic to reach the site does not appear to have been minimised	The Applicant does not agree that the construction access strategy has failed to minimise use of the public highway. The Applicant has had to balance practical, safety, land ownership and environmental considerations in developing the construction access strategy. This has included the need to avoid unsuitable routes and settlements where practicable, provide safe and

[2] https://www.bhs.org.uk/media/kvbajook/construction-sites-0824.pdf

Our Ref.	BHSC Comments	Applicant Response
	At BHSB-RR-06 of the Applicant's response REP1-055, it is stated that "The construction access strategy has been designed to avoid vehicles using the public highway as far as practicable". As the Society has pointed out in its WR (REP1-099), this is not the case as it would be possible to achieve the required access to the various parts of the site by using internal tracks more and reducing the impact on these country lanes to three crossings rather than about 3km of road. The applicant goes on to admit that in developing the construction access strategy, the focus has been on avoiding the need to pass through villages. So, the impact on vulnerable road users, such as equestrians and cyclists, has been ignored. In BHSB-RR-07 the Applicant states that "It is proposed to construct a network of internal haul roads to allow HGV movements around the Site, to avoid the need to route HGVs along unsuitable roads". These roads (sections of Great Staughton road between Great Staughton and Pertenhall and part of Green End road Little Staughton) are most certainly unsuitable and, as the Applicant acknowledges, such roads should be avoided. The Society regards the use of these roads as unacceptable, particularly when there are alternative solutions involving internal haul roads that would significantly reduce the adverse impact on vulnerable road users.	deliverable access to each part of the site, limit unnecessary temporary land take that cannot be justified for compulsory acquisition, and avoid other environmental impacts. The Applicant has assessed the impact on the public highway, including to non-motorised users, within **ES Vol 1 Chapter 9 Traffic and Transport [REP2-010]** supported by **ES Vol 2 Appendix 9-1 Transport Assessment [REP2-019]**. The conclusion of these assessments, supported by the **outline Construction Traffic Management Plan [REP1-034]** is that there would be no significant adverse effects, and that the proposed access would not result in any unacceptable impacts on users of the public highway.

2.2 Response to Bedford Local Access Forum

Table 5: Response to Bedford Local Access Forum Deadline 2 Submission (REP2-059)

Our Ref.	BLAF Comments	Applicant Response
BLAF-D2-01	BLAF-RR-01 – BOBLAF completely agrees with the BHS that these proposals to address the safety concerns raised are wholly inadequate and will not deliver the safe conditions required for users of the bridleways affected. We have read the BHS detailed submission on this point and do not feel the need to comment further other than to confirm that we agree with the BHS position that a safer diversion must be provided, especially as it is within the gift of one of the landowners who is benefitting from the scheme.	The Applicant has responded to the BHS comments in Table 1, above.
BLAF-D2-02	BLAF-RR-02 – BOBLAF is surprised that the response is merely to state that the point is noted without any confirmation that the safety issue we raise will be addressed.	The Applicant agrees with Bedford Local Access Forum's comment at reference BLAF-RR-02 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**. Appropriate controls would be set out for the section of footpath between the road and Pertenhall FP29, and would be set out in the final Public Right of Way Management Plan, for approval by the Local Highway Authority.
BLAF-D2-03	BLAF-RR-03 – It is not much comfort to know that there will be 'very little noise within the Site' when using the PROWs that are within the Site out of construction hours. Some of the PROWs are quite a distance from the Site	Requirement 17 does not permit unrestricted or routine construction outside standard hours. It permits only emergency works or works which do not cause noise audible at the boundary of the Order limits and which do not give rise to materially new or materially different environmental effects. General

Our Ref.	BLAF Comments	Applicant Response
	boundary and so could be affected by fairly significant out of hours noise. Part of the enjoyment of a walk in the countryside is the relative silence and the sound of birdsong. This response gives no comfort that these will be able to be enjoyed out of working hours. BOBLAF notes that at present some tractor noise may be heard at times during the year, particularly during harvest, but this agricultural, countryside noise is quite different from construction noise. We continue to consider that this Requirement should be amended to reflect audibility from any PROW, if the exception to allow certain work outside standard hours is not removed entirely.	construction works would not be occurring outside of the working hours secured by Requirement 17(1) unless approved by the local planning authority in advance. The Applicant maintains that Requirement 17(2)(b) of the **draft DCO [REP1-005]** is a high bar, in that any work undertaken in accordance with this must produce no audible noise at the Site boundary.
BLAF-D2-04	BLAF-RR-04 and 05 – The assessment presented in the examination documents does not, in our view, present a full assessment of the impact on PROWs. Whether the LVIA has or has not been prepared in accordance with guidance, we take issue with the conclusions that the year 10 visual impact at VP9 and VP12, which is rated as Moderate Adverse, can be viewed as Not Significant. 50% of the views from this Bridleway will be eliminated by the trees to be planted as screening. This is over a distance of about 1km. How can this be deemed insignificant? We remain of the view that the judgements made within the LVIA do not fully take into account the continuing impact over the length of a ride or walk.	The Applicant maintains its response at reference BLAF-RR-05 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**. The assessment of Viewpoints 9 and 12 in **ES Vol 1 Chapter 5 [APP-041]** recognises that there would be a moderate adverse effect on views from this section of bridleway, but does not consider this in the longer-term to be a significant effect in EIA terms. At year 10, the views would be of the trees and hedgerow adjacent to the bridleway, and whilst the open views in this direction would be lost, views of trees and hedgerows alongside this bridleway are not uncharacteristic in the local landscape. Thus, whilst there would be an adverse change in the view due to a loss of openness, it would not result in a significant effect in EIA terms. The views in this location are not promoted or recognised viewpoints, and are not of a designated landscape.
BLAF-D2-05	BLAF-RR-06 – we confirm our view that this viewpoint is a point that the ExA should visit. It will give him a chance to	The Applicant notes this comment.

Our Ref.	BLAF Comments	Applicant Response
	compare the visualisations with the reality of the current scene.	
BLAF-D2-06	BLAF-RR-07 – the Applicant's response makes no sense – how does moving screening planting back from the PROW and closer to the fencing impact on the balance between visual impact and retaining public access? Moving the hedging back would widen the corridors and reduce visual impact whilst retaining public access.	The Applicant notes that the further a hedgerow is from a PRoW, the less effective it can be as screening due to a change in perspective. The Applicant's design accounts for this, whilst also considering post-decommissioning landscape patterns and likely agricultural usage.
BLAF-D2-07	BLAF-RR-10 -the wording re closure due to ASB is noted but 'consultation with the LPA' is not sufficient. It must be with the consent of the LPA and notification to the public should be made as it would be in the case of a TRO on a dedicated PROW. BOBLAF continues to consider the offered additional access (including the additional FP upgrade to BW referenced in BLAF-RR-11) offers insufficient benefit to local residents.	The Applicant has updated paragraph 5.3.45 of the **oLEMP [as updated alongside this submission]** to provide additional detail.
BLAF-D2-08	BLAF-RR-11 – we had requested 6 additional routes and, whilst we are of course, happy to see the agreement to provide the connecting bridleway across Site C, the others have been rejected or at least not yet agreed. The excuse that our first request would require a bridge over the brook is unacceptable as the cost of such a structure must be insignificant in the overall context of the development. The second - we hope that the landowner will see the sense in formalising the use of the short section as it will	The Applicant maintains its response at reference BLAF-RR-11 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**. In relation to the first request, it is not the cost of a structure which is the restriction, but that the Pertenhall Brook is a main watercourse with areas of adjacent flood risk. The Applicant would require not only the consent of the landowner to provide this route, but also permits from the Environment Agency. The Applicant is not currently pursuing this additional permissive connection.

Our Ref.	BLAF Comments	Applicant Response
	be to both his benefit as well as the public's given reduced potential liability. The third is most welcome though it should be noted that this is not new public access as it involves the upgrade of FPs to BWs. We also insist that this this should be a dedicated route (as we would wish all additional access to be). As regards the fourth, we feel that the Applicant has intentionally missed the point that this suggestion provides a route that has open views. It is true that there is already a connection between the two footpaths – the suggested route would thus create a circular route. Regarding our final suggestion, we hope that the consultations with the landowner will bear fruit. We understand that the LPA (BBC) has also requested a connection here and for it to be a bridleway across to Spring Hill Road – we fully support this request which in effect replaces ours.	
BLAF-D2-09	BLAF-RR-12 – We continue to believe strongly that new routes should be provided on a dedicated basis unless there are genuine operational reasons why this is not possible. The landowners' lack of willingness is disappointing, particularly given the extent to which they will benefit from the development. We ask the Applicant to raise this once more with the landowners. As to planning balance, the low level of additional permissive routes offered in such a large area suggests to us that very limited positive weight can be given to these. They certainly fall a long way short of compensating for	The Applicant acknowledges permissive rights are not as beneficial as permanent access rights, and accordingly considers the matter should only be afforded limited positive weight in the planning balance (as per Table 3 of the **Planning Statement [APP-031]**).

Our Ref.	BLAF Comments	Applicant Response
	the severe adverse effects on the PROWs, both within the site and within sight of it, and their users.	
BLAF-D2-10	BLAF-RR-13 – this response is disappointing, but we acknowledge that there is the potential for conflict with the ecological objectives of the scheme if open access areas were provided in the larger green infrastructure. But there does remain the possibility of doing so alongside some of the PROWs in wider corridors – especially if our suggestion that some corridors should be widened is accepted. See BLAF-RR-07.	The Applicant maintains its response at reference BLAF-RR-13 in the **Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]**.

2.3 Response to C Patel

Table 6: Response to C Patel Deadline 2 Submission (REP2-063)

Our Ref.	CP Comments	Applicant Response
CP-D2-01	The solar generating station has secured a Gate 2 connection offer and can therefore be regarded as having a defined pathway to connection, albeit subject to wider network works that do not as yet appear to be fully scoped or certain. In contrast, the proposed battery energy storage system has only achieved Gate 1 status. This is a materially different position. Gate 1 does not confer a confirmed connection date and does not provide a basis for progression through the connections process in the same way as Gate 2. This distinction is not a matter of timing or programme risk; it goes to the fundamental question of whether the battery element is deliverable at all. Under the current connections regime, there is a real possibility that Gate 1 projects will not proceed to Gate 2 and may exit the queue entirely. The battery component of the scheme must therefore be regarded as uncertain and potentially non viable.	The Applicant does not accept that the BESS should be regarded as uncertain or potentially non-viable. The comment correctly identifies a distinction between Gate 2 and Gate 1 status: NESO describes Gate 2 as allowing projects to secure a confirmed connection date, connection point and queue position, whereas Gate 1 projects are not assigned a confirmed connection date but may progress through future windows where readiness is demonstrated. However, that distinction does not support the conclusion drawn in the representation. The Gate 1 position relates to the BESS's separate ability to import electricity from the grid for wider grid-balancing services. It does not determine whether the BESS can be consented, constructed, charged from the Scheme's solar generation, or used to export stored solar electricity under the Scheme's solar generation connection offer. **ES Vol 1 Chapter 2 [APP-038]** is clear that the Scheme allows the generation and export of 400 MW of electricity from the solar generating station, with the BESS designed to be capable of exporting and importing up to 100 MW. The primary function of the BESS is as an integral element of the Scheme, storing electricity generated by the solar PV modules at times of low demand and releasing that electricity at times of peak demand. Its additional role in importing excess electricity from the grid and providing grid-balancing services is supplementary to that core co-located storage function. Accordingly, the absence of a Gate 2 import offer for the BESS at this point in time does not make the BESS or solar development undeliverable. At most, it relates to the timing and extent of the BESS's ability to provide grid import and balancing services. The BESS remains viable as temporary storage for the Scheme's solar generation, with stored solar electricity

Our Ref.	CP Comments	Applicant Response
		capable of being exported through the Gate 2 solar generation connection offer. The Applicant intends to build out the BESS within the defined and assessed maximum parameters.
CP-D2-02	The application nevertheless seeks consent for a co-located solar and battery project as a single hybrid development. This risks overstating the certainty and functionality of the scheme as proposed. If the battery element does not progress, the development would be materially different in form, operation and impact from that which has been assessed.	The Applicant disagrees with this comment, for the reasons set out above.
CP-D2-03	National Grid makes clear that the project is not simply connecting into existing infrastructure, but is dependent on major future works at Eaton Socon substation. That substation is currently full and may require expansion, rebuilding or even a completely new facility, with the final solution not yet determined and subject to the outcome of the National Energy System Operator Connections Reform process. Crucially, the point of connection for East Park remains uncertain. This introduces a fundamental deliverability and programme risk: the project is being promoted through the DCO process without a confirmed final point of connection or defined substation solution.	The Applicant is in regular dialogue with National Grid, however National Grid has not yet been able to confirm the scope and exact timeline for the proposed works required to the Eaton Socon Substation. The date of connection committed in the Connection Offer received by the Applicant is October 2028. Therefore, the expectation is that the upgrade of the existing substation would be completed by this point. However, the Applicant is not in a position to confirm this. The confirmed connection date and the commitment to be connected is the only certainty the Applicant currently has on this matter. The fact that National Grid may need to undertake wider reinforcement, expansion or optimisation works at the Eaton Socon Substation is not unusual for a nationally significant infrastructure project, and does not mean the Scheme lacks a defined or deliverable connection. Such matters are properly managed through the grid connection process and National Grid's detailed design work. They do not alter the Applicant's connection point or undermine the assessment of the authorised development.

Our Ref.	CP Comments	Applicant Response
CP-D2-04	National Grid states that it requires “absolute” or “complete” control of land around Eaton Socon to facilitate its own future works. This presents a significant land use and compulsory acquisition risk. It suggests that the current Order Limits and land strategy may not be adequate or compatible with the infrastructure required to connect the project. There is a clear risk that East Park’s infrastructure – particularly cables and access – could be constrained, relocated or rendered unworkable.	The Applicant has set out its position and the approach taken to ensure that the Scheme can be connected to a new upgraded Substation, the design of which has not been finalised. The Applicant’s position is set out in the **Statement of Reasons [PD-007]**, and the **Grid Connection Statement [APP-169]** submitted with this Application. The Applicant has a connection agreement with the National Energy System Operator Limited (NESO) to connect the Scheme to the Eaton Socon Substation. NESO is the system operator for the complete National Electricity Transmission System (NETS) while National Grid is the Transmission Owner for England and Wales pursuant to a transmission license issued under the Electricity Act 1989. National Grid is the freeholder owner of the Eaton Socon Substation and NESO is responsible for operating the Eaton Socon Substation. In order to accommodate the proposed connection associated with the Scheme and other potential projects in the area, substantial upgrades are required to the Eaton Socon Station. However, National Grid is yet unable to confirm the scope of these upgrades at this time and therefore cannot confirm the exact point of connection. The Applicant is in regular dialogue with National Grid and has agreed a strategy of adopting a wide corridor around the Substation. Due to the lack of information available in relation to the extent of the works to be carried out for the upgrade of the Easton Socon Substation and where the point of connection will be, the Applicant seeks powers to compulsorily acquire new rights in respect of the Substation area, to ensure a degree of flexibility in order to accommodate for different alternative connection points. Whilst the Applicant seeks powers to acquire new rights over a wide area surrounding the Substation, this will inevitably be narrowed down to what is

Our Ref.	CP Comments	Applicant Response
		required to connect the Scheme once the point of connection has been confirmed. The Applicant continues to engage with National Grid and protective provisions are currently being negotiated to ensure that National Grid's land and apparatus are safeguarded.
CP-D2-05	National Grid considers the Draft Order to be "deficient" because it does not yet include protective provisions in its favour, "despite these having been incorporated into multiple DCOs". It explicitly states that, without such provisions, there is nothing to prevent the project from adversely affecting the Eaton Socon Substation Project, with "serious detriment" to National Grid and other users of the network. This amounts to a substantive objection from a key statutory undertaker and raises serious doubt as to whether the application is currently in a form that can be safely consented.	The Applicant understands the importance of including suitable protective protections for National Grid within the **draft DCO [REP1-005]** and is seeking to negotiate and agree bespoke protective provisions prior to the close of Examination. Notwithstanding this, the draft DCO contains generic protective provisions which afford the necessary statutory safeguards to the interests, functions, assets and statutory powers of statutory undertakers including National Grid as an electricity undertaker under Part 1 of Schedule 13 (protective provisions). These have been included in a generic form to ensure that sufficient protection is afforded and also protect gas, water and sewerage undertakers. As evidenced by the **Draft Statement of Common Ground with National Grid Electricity Transmission [REP2-042]** the Applicant is in active discussion with National Grid regarding the form of these protective provisions.
CP-D2-06	The protective provisions sought by National Grid introduce further risks to the East Park project. These provisions would give National Grid significant control over design, construction, land use and timing, including approval rights over works and the ability to require changes. This could materially constrain how the project is built and operated, increase costs and introduce delays, with consequent further impacts on the local communities. National Grid has also indicated that it may pursue these	As evidenced by the **Draft Statement of Common Ground with National Grid Electricity Transmission [REP2-042]** the Applicant is in active discussion with National Grid regarding the form of protective provisions sought. The Applicant is confident that agreement can be reached on a form of protective provisions that adequately protects the interests of both parties. Additionally, the Applicant notes that the bespoke protective provisions sought by National Grid would only affect works that are to be carried out on

Our Ref.	CP Comments	Applicant Response
	matters through hearings if agreement is not reached, adding further uncertainty to the Examination process.	National Grid's land, or those which could affect National Grid's apparatus or operations.

2.4 Response to Caroline Thurmott

Table 7: Response to Caroline Thurmott Deadline 2 Submission (REP2-066)

Our Ref.	CT Comments	Applicant Response
CT-D2-01	I have seen where the proposed route will go and would comment on the following: 1. High Wood Solar Farm; this is in fact on a very busy B645 on a sharp bend so high volumes of traffic will be extremely dangerous and the path opposite is the only walking route for residents of Hail Weston. 2. Section 2 - Santra access (SA12) Spring Hill to Green End. This road is very narrow with tight blind bends. 3. SA06 access from Green End. This is already a dangerous crossroads at Kangeroo and has cars, bikes, motorbikes, horses and runners going through the junction regularly. The road from Kangeroo to the B645 is already showing as 'unsuitable for heavy vehicles' and two cars are not able to pass each other without slowing right down. Horse lorries have already been stopped from using this road. The plan is for the junction to be used for SA03, SA04, SA05 and SA06. This is a major accident hazard and the narrow roads would mean emergency vehicles could not get through. 4. Green End to Little Staughton. SA08, SA07, SA09 are all by homes. Green End goes through part of the village of Great Staughton next to homes. 5. It is unclear on Section 3 where the traffic is planned. It says turning right but if it is a right turn, how is the traffic getting to Manor Farm.	The Applicant notes these comments and would respond as follows: 1. High Wood Solar Farm is a separate consented development unrelated to the Scheme other than in the context of cumulative impacts, which have been assessed to be not significant in EIA terms. The B645 in the vicinity of the High Wood Solar Farm site access junction has a 6m carriageway width, sufficient to permit two-way movement of HGVs. The footway runs along the eastern side of the B645 and is therefore uninterrupted by vehicle movements into and out of the High Wood Solar access junction. 2. Carriageway widening to facilitate safe two-way movement of HGVs along this section of road is proposed, as illustrated in Figure 9 in Appendix D of the **outline Construction Traffic Management Plan (oCTMP) [as updated alongside this submission]**. 3. Construction traffic would only travel along Great Staughton Road for approximately 300m to the west of Green End and 400m to the east of Green End. Construction HGV movements along these sections of Great Staughton Road would be extremely low, with a maximum of 1 movement per day in each direction. 4. The majority of HGV movements at accesses SA07 and SA08 would be directly across Green End. Construction HGV movements to and from access SA09 would be extremely low, with a maximum of 1 movement per day in each direction along Green End to the south of accesses SA07/SA08. 5. It is not clear what is referred to by 'Section 3'? Construction traffic will access the Manor Farm access junction (SA01) by turning right from access SA02 before turning left into access SA01, which would be located

Our Ref.	CT Comments	Applicant Response
	6. Section 4 Moor Road. This is a very narrow road with dangerous blind bends and is totally unsuitable for the volume of heavy goods vehicles planned.	approximately 70m north of access SA02 (and the reverse for return journeys). These movements would be controlled through temporary traffic management. 6. No HGV movements would travel along the length of Moor Road during the construction phase. All construction traffic would cross directly over Moor Road between accesses SA14 and SA15. These movements would be controlled through temporary traffic management, including banksmen.

2.5 Response to Christoper Lacey

Table 8: Response to Christopher Lacey Deadline 2 Submission (REP2-068)

Our Ref.	CL Comments	Applicant Response
CL-D2-01	The report fails to recognise fully the very significant risks that EPE scheme poses to the below ground archaeology by not carrying out a comprehensive intrusive trial trenching exercise and evaluation of the archaeology underlying sites A & B and the cable corridors PRIOR to completion of the Examination phase. This is also the case with site D and parts of site C and related cable corridors although this is not raised by BBC as it is in Cambridgeshire CC and Huntingdonshire DC. The piling and trenching works proposed as part of the construction phase pose a very material risk of causing more than substantial harm to the significance of any underground archaeological remains and evidence which is believed from the very limited trial trenching carried out so far, run from the Neolithic through to the Bronze age, the Iron age, Roman, Romano-British, Anglo Saxon and Later Medieval as well as more recent historical periods. Proper evaluation requires a thorough intrusive investigation and review of the archaeology at the examination stage and at the hearings with sufficient evidence, analysis and scrutiny to be provided well ahead of any DCO decision. Postponing proper intrusive investigations, until after the DCO decision when momentum will have gathered and a time and resource challenged BBC Historic Environment Team 'BBHET' could be put under pressure, creates a risk that BBHET as well as Cambridgeshire Historic Environment Team CHET	The Applicant disagrees with the comment and would highlight that the approach to a two stage evaluation was agreed with both CHET and BBHET in advance of the first stage of evaluation trenching works. The Applicant would also note that it is the CHET that provides archaeological advice to Huntingdonshire District Council. It is highlighted by the Applicant that the trenching completed to date (within Sites A and B) represents a minimum 1.5% sample (higher percentage sample in areas of archaeological potential and high development impact) and has resulted in a clear correlation between the features uncovered during the evaluation and the geophysical survey. The majority of areas presumed blank by the geophysical survey generally matched the findings within the evaluations, with a small number of archaeological features present in trenches not targeting geophysical anomalies, hence the potential of areas without geophysical anomalies is considered by the Applicant to be 'Low', though it is acknowledged that BBHET would prefer the term 'unknown' to be used until the completion of the second phase of trenching. The Applicant would further note that the **oAMS [REP2-034]** highlights that further stages of archaeological evaluation work should be completed within paragraphs 5.3.1 and 5.3.2 **[REP2-034]** '*the archaeological brief jointly issued by CHET and BBHET required two phases of archaeological investigation prior to construction. Therefore, following the granting of the DCO, a second phase of trial trenching will be undertaken…the general aim of these investigations… is to more accurately establish the potential for the presence/absence of archaeologically significant remains allowing the mitigation measures set out in Section 6.0 to be applied appropriately'.*

Our Ref.	CL Comments	Applicant Response
	and Huntingdon Historic Environment Team HHET could be pushed into prematurely agreeing to EPE's mitigation plans without adequate detailed scrutiny.	Both BBHET and CHET will have substantial control and input into the design of the next phases of evaluation trenching as is noted in Paragraph 5.4.2 **[REP2-034]** which states that '*a WSI for this additional trial trenching will be developed in line with a new brief prepared by CHET and BBHET*'. The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, in order to establish the final archaeological mitigation measures to be embedded into the detailed design of the Scheme (including decommissioning) and is committed to ensuring the Archaeological Mitigation Strategy is updated in consultation with BBHET, CHET and HE at each stage of investigation. The final mitigation strategy would be informed by the completed evaluation results and, as per Requirement 15(4) of the **draft DCO [REP1-005],** must be approved by the relevant LPA in consultation with the county archaeologists (BBHET and CHET) and Historic England.
CL-D2-02	Whilst I support some of the concerns that BBC expresses, for example that relating to the impact on the views to and from and setting of Grade 1 listed C13th All Saints Church Little Staughton (Asset 38) and from the Scheduled Monument C13th The Old Manor House Cretingsbury and all along the ancient causeway between the two historic assets, I believe that the impact on other heritage assets around sites A and B is seriously underestimated particularly by the applicant and also by BBC. In particular I disagree with the view expressed in Section 8 of the LIR on Cultural Heritage and Archaeology paragraph 8.5 that less than substantial harm to the significance that would be caused to the setting of Grade 1 listed C12th St Peter's Church Pertenhall (Asset 48).	The Applicant acknowledges that there is disagreement between BBC and HE in relation to the assessed levels of effect upon the settings of All Saints Church, Little Staughton and from the Scheduled Monument The Old Manor House Cretingsbury. The Applicant has provided a detailed assessment of the potential effects upon the settings of designated assets (including those in the area surrounding Sites A and B) within the settings impact assessment **[REP1-022]** and disagrees that impacts have been seriously underestimated. The Applicant would further highlight that views from east of St Peter's Church, Pertenhall have been considered, as set out within Table 1 of the settings impact assessment **[REP1-022]**, which makes reference to visualisations from locations east of Pertenhall (Viewpoints 21 **[APP-132]** and 23 **[APP-133]**). The Applicant acknowledged the visibility of elements of the Scheme in views from the east towards St Peter's Church and had *'considered that in some views of the church from the north-west, north, north-east and east elements of the Scheme would appear in the backdrop to*

Our Ref.	CL Comments	Applicant Response
	BBC base their opinion on the asset being viewed from the West looking eastwards towards the Church where the impact is more modest as it sits in low ground and is surrounded by mature trees and vegetation. BBC do not however adequately reflect the damage that would be done to the setting of St Peter's Church when looking westwards from the East such as from the intersection of Byway 25 and Footpath 5, a position which is believed to be close to the location of a possible C12th or C13th medieval moated Manor House used by the Knights Templar. The setting of St Peter's Church is also damaged when viewed from the circa 250m entire length of the ridgeway spanned by Footpath 5. The backdrop and setting of St Peter's Church from these vantage points to the East would lead to it suffering more than substantial harm to the significance from the EPE scheme. The classification of 'less than substantial harm' is incorrect when all viewpoints are considered. For context on the importance of St Peter's Church and views of it looking from the East is that the Church was used by the Knights Templar community who had a chapel at the eastern end of the North Arcade of the Church until it was demolished in early C19th to make way for the current Vestry. It is likely that the Knights Templar community looked westward from their Manor House towards the Church and used intervening footpaths to access the Church	*those views, which is currently entirely rural in character being formed of agricultural land, typically with hedgerow and mature trees boundaries along with other pockets of woodland'* and maintains their assessment of a Low impact upon the church's setting during both the construction and operational phases which would result in a low level of '*less than substantial'* harm to the asset. The Applicant would further highlight that in planning terms '*substantial harm'* is a high test and had included a section discussing harm within the assessment methodology section of **ES Vol 1 Chapter 6 [APP-042]**. Paragraph 6.4.21 **[APP-042]** states that '*the PPG notes that 'substantial' harm is a 'high test' and that as such it is unlikely to result in many cases. What matters in establishing whether harm is 'substantial' or not, relates to whether a change would seriously adversely affect those attributes or elements of a designated asset that contribute to, or give it, its significance'.*

2.7 Response to Elaine Wheeler

Table 9: Response to Elaine Wheeler Deadline 2 Submission (REP2-071)

Our Ref.	EW Comments	Applicant Response
Outline Public Rights of Way Management Plan:		
EW-D2-01	Roles and Responsibilities: There is a huge list of on site Managers, but this is only an indicative list and does not set out who they would answer to	The **outline Public Rights of Way Management Plan (oPRoWMP) [REP1-042]** will be developed into a final PRoWMP prior to construction. The final PRoWMP will define responsibilities, roles and actions and will include named individuals, an organogram and contact directory, together with monitoring, reporting, document control, stakeholder communication, training and emergency procedures.
EW-D2-02	Management and Mitigation Measures 5.16 states that where damage is caused to PROWs, it will be resolved. It doesn't mention with what or the time lapse from damage to rectification.	Paragraphs 5.1.6 to 5.1.8 of the **oPRoWMP [REP1-042]** require the final PROWMP to provide full details of any surfacing works, including the location and extent of works, surfacing specification, method of installation, measures to maintain safe passage, and the method and timing of reinstatement, including the standard to which the PRoW will be reinstated. These details will be submitted to and agreed with the relevant planning authority, in consultation with the relevant highway authority.
EW-D2-03	6.4.6. equestrians to be given right of way and lorries stopping 50m behind. The noise and airbrakes will cause upset to horses and how will this be monitored.	The Applicant recognises that horses can be sensitive to sudden noise and movement. The measures in paragraph 6.4.6 **[REP1-042]** are intended to reduce that risk by preventing close interaction between HGVs and equestrian users. Equestrian users would be given right of way, HGVs must maintain or stop at a minimum 50m separation distance, and 50m marker posts would be installed to assist drivers in judging that distance. Warning signage would also be provided for both PRoW users and drivers, and banksmen may be deployed during periods of intense construction activity. The use of airbrakes cannot be eliminated entirely, as they form part of normal HGV operation, but drivers would be briefed to proceed cautiously,

Our Ref.	EW Comments	Applicant Response
		avoid unnecessary harsh braking or sudden movements near equestrian users, and comply with the signed controls. Monitoring would be secured through the final PROWMP, which must include procedures for monitoring, inspection, reporting, staff briefing, stakeholder communication and responding to PRoW user queries. Complaints and perceived safety issues would be logged, reviewed and subject to corrective action where necessary.
EW-D2-04	6.8.5. The verge along here is narrow and on a slope. This would be a dangerous solution.	The Applicant disagrees and has set out measures to mitigate risks to public rights of way users within Section 6.8 of the **oPRoWMP [REP1-042]**.
EW-D2-05	6.9.3. the use of a banksman during intensive construction, illustrates that this is going to be dangerous for anyone crossing the site and how would a banksman calm a horse	The purpose of a banksman is precisely to provide an additional layer of control during periods of more intensive construction activity, over and above the proposed signage, separation measures and management of construction vehicle movements. It is not the role of a banksman to “calm” a horse. Their role would be to control construction traffic, stop or hold vehicles where necessary, maintain separation, and allow equestrian users to pass safely at their own pace. Equestrian users also retain responsibility for managing their horses appropriately when using a public bridleway.
EW-D2-06	6.17.1. Site D at Hail Weston bridleway the conflict with construction vehicles will be intense, especially as this is proposed as the main route into the site. The location of the BESS adjacent to this route is also of concern regarding safety of all using it.	The Applicant notes that Hail Weston 7 (Bridleway 112/7) is not crossed by the main construction site access into the Site. The bridleway instead separates the north and south sections of Site D, as well as the access to the grid connection corridor.
EW-D2-07	The clause regarding antisocial behaviour resulting in closure of permissive routes is here, which would apply to the Little Staughton/Keysoe bridleway.	The Applicant has updated paragraph 5.3.45 of the **oLEMP [as updated alongside this submission]** to provide additional detail.
EW-D2-08	Implementaion of the Management Plan	The **oPRoWMP [REP1-042]** has been submitted as part of the application and sets out the proposed approach to PRoW management, including route-specific measures, temporary diversions, signage, segregation, surfacing

Our Ref.	EW Comments	Applicant Response
	This will not be written until approval is granted, so no way to comment on this.	and reinstatement requirements, monitoring, reporting and complaints procedures. It is therefore available for examination and comment now. The final PRoWMP will be in substantial accordance with the oPRoWMP to be certified under the DCO.
EW-D2-09	Monitoring & Record Keeping This will be done throughout, but it doesn't at this stage state what will be monitored and who the relevant authorities to have access to this would be.	Section 9 of the oPROWMP **[REP1-042]** confirms that monitoring and reporting will take place throughout the construction and operational phases in relation to PRoW management, including oversight to ensure that corrective action is taken where necessary. It also identifies the types of matters to be recorded, including complaints relating to accessibility, signage, surfacing condition and perceived safety. The final PRoWMP will then set out the detailed monitoring, inspection and audit procedures. Records will be made available on request to the relevant authorities, which would include the relevant planning authority and highway authority for the affected route, namely Bedford Borough Council, Huntingdonshire District Council and/or Cambridgeshire County Council as applicable.
EW-D2-10	In addition, there will be a great number of heavy vehicles delivering materials to the area using the metalled roads leading to the site – if permission is deemed appropriate. These vehicles and drivers will not know these winding, narrow country roads which have no footpaths and are not wide enough for two vehicles to pass. Equestrians and pedestrian walkers will be reluctant to use the routes across the site due to dangerous hazards – vehicles the speed and size, dust or mud, the noise from construction to name a few. They will therefore be on the roads. Construction vehicles should therefore for safety reasons be met by escort vehicles at the motorway junctions and be guided at an appropriate speed taking into account the living hazards that will also be forced to use them. This is not because of the value of their - the Battery Storage	The Applicant recognises that construction traffic must be carefully managed on rural roads used by walkers, cyclists and equestrians. However, it is not accepted that routine HGV movements require escort vehicles from motorway junctions. That would be disproportionate, would itself add further vehicle movements, and is not normally required for standard construction deliveries. Where abnormal or exceptional deliveries require additional control, these would be managed through the appropriate delivery-specific arrangements.

Our Ref.	EW Comments	Applicant Response
	Units having a police escort, but for the safety of the inhabitants of this area	

2.8 Response to Helen Stark

Table 10: Response to Helen Stark Deadline 2 Submission (REP2-072)

Our Ref.	HS Comments	Applicant Response
HS-D2-01	The applicant has not submitted adequate bat data in relation to the development area, which means that the assessment of impacts on bats is meaningless. Surveys, over consecutive survey seasons, should be undertaken to assess all direct and indirect impacts on bats throughout the development area, including: • Loss of foraging and commuting routes; • Disturbance and / or loss of roosts; • Disturbance and / or loss of maternity roosts; • Polarised-light attraction effects in relation to insects and knock-on effects for bat feeding.	Baseline bat activity survey was undertaken in line with current best practice guidance (Collins, 2023) as outlined in **ES Volume 2 Appendix 7-7: Bat Activity Survey Report [APP-097]**, which does not require multiple years of survey effort. Baseline surveys are considered to accord with best practice guidance, with impacts to foraging and commuting bats assessed within **ES Vol 1 Chapter 7 [APP-043]**. This included an assessment of the potential impacts to bat habitat, including fragmentation, disturbance effects from noise and lighting, and changes to foraging resources (i.e., insect prey). A detailed assessment of impacts to roosting bats was scoped out, due to the implementation of embedded measures contained within the **oCEMP [REP2-028]**. This includes the retention of all trees and structures that may offer suitable bat roosting habitat, pre-construction surveys for bats where impacts may occur and implementation of Reasonable Avoidance Method Statement.
HS-D2-02	Swineshead Woods Site of Special Scientific Interest (SSSI) is of note for several bat species, although the data is not currently comprehensive. Bat records comprise: • Nathusius pipistrelle (seen prior to 2016. Conservation status: near threatened); • Daubenton's; • Noctule; • Soprano pipistrelle;	Swineshead Wood SSSI and the overlapping Swineshead Wood County Wildlife Site are not designated for the presence of bat species, but instead for the woodland habitats present. It is however acknowledged that woodland habitats within the landscape have potential to support bat species and as such baseline survey was undertaken as outlined in **ES Volume 2 Appendix 7-7: Bat Activity Survey Report [APP-097].** It is acknowledged survey effort undertaken may differ from that undertaken in support of other developments (e.g., A428 Black Cat to Caxton Gibbet), however surveys and impact assessment is tailored to the predicted impacts

Our Ref.	HS Comments	Applicant Response
	• Common pipistrelle; • Natterer's; • Barbastelle, multiple individuals (Conservation status: vulnerable (bats.org.uk). Barbastelle can forage up to 20km, although typically 5-7km from their woodland roosts. Further surveys would be consistent with Natural England's requirements placed on National Highways for the A428 Black Cat to Caxton Gibbet DCO Examination. At present, there is a risk that the applicant may breach legislation in relation to bat populations. Further advice should be sought from Natural England and other relevant stakeholders including Bedfordshire Bat Group.	of a particular development type. The survey effort in support of the Scheme is considered appropriate to the level of impacts. Natural England has confirmed agreement with the Applicants assessment of impacts to nationally designated sites **[AS-023]**, which includes Swineshead Wood Site of Special Interest. Additionally, Natural England has also expressed agreement with the conclusion of the Environmental Statement in relation to internationally designated sites and **Information to Inform a Habitats Regulations Assessment [APP-035]**, which principally assessed impacts on bats associated with Eversden and Wimpole Woods Special Areas of Conservation. The Applicant has a **Statement of Common Ground with Natural England [REP2-039]** with all matters agreed.

2.9 Response to John Chalmers

Table 11: Response to John Chalmers Deadline 2 Submission (REP2-078)

Our Ref.	JC Comments	Applicant Response
JC-D2-01	The applicant's response states that the proposed mitigation measures will eliminate visual impact and there will be no industrialisation of this 6 mile tract of open countryside. This very subjective view is contrary to the experience of other large scale sites and has no further details to substantiate their claim.	The Applicant does not agree that the LVIA states that mitigation measures would "eliminate all visual effects". The LVIA explicitly acknowledges that the Scheme would introduce noticeable change within some views and that significant visual effects would occur at certain locations, particularly during construction and the early years of operation before mitigation planting has matured. The assessment also recognises that the Scheme would alter the character of parts of the landscape through the introduction of solar infrastructure. However, the LVIA concludes that the proposed mitigation strategy, including retention of existing vegetation and additional planting, would assist in integrating the Scheme within the surrounding landscape over time and reducing visual effects where possible. The conclusions of the LVIA are based on a transparent assessment methodology, supported by detailed landscape character assessment, viewpoint analysis and professional judgement.
JC-D2-02	Applicant recognises that such a development will have a "inevitable adverse effect" on human health and wellbeing, but dismisses these as, in their opinion, "not significant".	The Applicant recognises the concern but considers the comment misunderstands the terminology used in EIA. An 'adverse effect' does not mean that unacceptable harm to human health or wellbeing is inevitable. It means that a change has been identified which may be adverse in character when compared with the baseline. Whether an effect is significant a technical judgement informed by the sensitivity of receptors, the magnitude, duration, frequency and reversibility of the effect, and the embedded and secured mitigation. Accordingly, where the ES identifies residual effects as "not significant", that does not dismiss

Our Ref.	JC Comments	Applicant Response
		local concerns. It means those effects have been assessed and are not predicted to amount to likely significant in EIA terms.
JC-D2-03	The applicant does not answer criticisms of its claim of ecological net gain and merely refers back to its original documents based on inadequate survey detail.	The Applicant has responded to representations in relation to biodiversity net gain in submissions at both Deadline 1 and Deadline 2, some of which have resulted in amendments being made to the Biodiversity Net Gain Report, or the framework of environmental management plans. The Applicant disagrees that there is inadequate survey detail, and considers the survey effort to be proportionate to the likely level of impacts and sufficient to characterise the likely significant effects that could result from the Scheme.
JC-D2-04	The Applicant reiterates their original statements which were the cause of the initial concerns as they are based on surveys that were inadequate and lacking in sufficient detail.	As above, the Applicant disagrees that the survey effort is inadequate, or lacking in sufficient detail.
JC-D2-05	Battery Storage Issues The Applicant has not described adequate mitigation of BESS risks. For instance, air quality mentions plume modelling for “reasonably worst case” - 2.4.10, and toxic fume dispersion assessment for “anticipated short term” fires - 2,4,18, despite the known difficulties in stopping thermal runaway fires and the potential spread of fumes over several kilometres.	The Applicant has set out comprehensive mitigation measures for the BESS within the **outline Battery Safety Management Plan [APP-162]** which includes measures designed to specifically prevent and reduce the risk of thermal runaway.
JC-D2-06	My concerns raised about severe traffic congestion on B and C road are dismissed as “negligible” by the Applicants as defined by their “expectations”, “instructions” and “forecasts” with no detailed analysis available to substantiate their assertions which have been found be completely contradicted by the experiences of other large solar installations. 2.12.11. Total reliance is placed on the use of the internal site roads, when the reality is that	The Applicant does not accept that traffic concerns have been dismissed or that the assessment relies on unsupported assumptions. The submitted assessment considers the likely construction traffic effects and identifies a controlled approach to managing construction vehicle movements. The purpose of the **outline Construction Traffic Management Plan [REP1-034]** is to ensure that construction traffic is routed, scheduled and managed in a

Our Ref.	JC Comments	Applicant Response
	drivers will rely on their GPS systems to choose their route. There is no method of monitoring traffic movements and no enforcement procedures defined. 2.8.39. There is emphasis on minimising disruption during construction site working hours, but makes no mention of any early morning HGV movements expected outside these hours.	safe and coordinated manner, with disruption to local communities minimised. Construction traffic would be subject to an agreed traffic management framework, including prescribed routes, delivery controls, driver instructions, signage, site management and monitoring. Compliance with those controls would be the responsibility of the appointed contractor, with breaches capable of investigation and corrective action. Construction traffic would be managed in accordance with the approved construction hours and any movements outside those hours would be exceptional and subject to appropriate controls or prior agreement where required.

2.10 Response to Paul Sheard

Table 12: Response to Paul Sheard Deadline 2 Submission (REP2-082)

Our Ref.	JC Comments	Applicant Response
PS-D2-01	Section 2.2.3 The applicant has not removed non-agricultural land from the BMV assessment. This land is not available for farming so should be removed from the assessment. See Table 2.1 Non-agricultural land represents 4.65% of the total area.	Table 2-1 of the **outline Soil Management Plan (oSMP) [REP1-044]** distinguishes agricultural land grades from "Non-agricultural" land, identifying 35.4 ha, or 4.6% of the Site, as woodland, tracks and similar land. That land has not been classified as BMV, nor relied upon as available agricultural land. The table presents the full land-take within the Site transparently, including non-agricultural areas, so that the assessment can be understood in the context of the whole Order limits. Removing non-agricultural land from the denominator would not change the mapped extent of Grade 2 or Grade 3a land.
PS-D2-02	Section 2.2.5 They continue to compare the site with the land classification in the surrounding area using old provisional ALC data which they state is not sufficiently accurate for development applications. How relevant is this comment? Some parts of Bedfordshire are 30 plus miles away from the site.	The comparison with Bedford Borough and Huntingdonshire District is provided only for context, not as a determinative assessment tool.
PS-D2-03	Section 4.1.7 There should be a more technical guidance as to the suitability of soils for construction during wet periods of the year. The 3mm roll test is a very antiquated method for determining soil wetness and unsatisfactory to assess a large area. There are too many variables involving this method.	The roll test is a recognised field check used as a practical, real-time trigger at the relevant working area, not as a single whole-site assessment tool. Suitability will also be subject to professional judgment, monitoring and stop-work controls. The final SMP will be overseen by an Environmental Clerk of Works (ECoW) who will be able to stop works where smearing or unsuitable ground conditions are observed. The **oSMP [REP1-044]** does not rely solely on the roll test to manage soil wetness across the Site, instead also setting a wider framework, including seasonal programming, prohibiting soil stripping, heavy vehicle movements and tipping where soils are above plastic limit or where ground is

Our Ref.	JC Comments	Applicant Response
		waterlogged, frozen or snow-covered, and requiring a method statement where wet-season works are unavoidable.
PS-D2-04	Section 4.1.10 No completed method statement for mitigating soil damage during wet periods	The Applicant does not agree that a completed wet-weather method statement is required at this stage. The oSMP is an outline control document certified through the draft DCO, with a final SMP to be approved before construction and prepared in substantial accordance with it. It is therefore appropriate for paragraph 4.1.10 **[REP1-044]** to require a wet-period method statement once the contractor, programme, plant, working areas and prevailing ground and weather conditions are known.
PS-D2-05	Section 4.1.12 GPS should be fitted to all excavation machinery not at the applicant's discretion	The Applicant does not agree that such a prescriptive amendment is necessary. A blanket requirement for every item of excavation machinery to be GPS-fitted would not necessarily improve soil protection, particularly for small plant, short-duration works, or activities where depth is more appropriately controlled by survey setting-out, physical markers, depth-control systems, method statements and competent supervision. The final SMP must be approved before construction, informed by further soil surveys and construction method statements, and implemented with oversight from a competent soil specialist/ECoW, who can require activities to stop if unsuitable handling is observed.
PS-D2-06	Section 4.1.22 Long term storage guidelines will definitely be required as materials will need to be stored for use during decommissioning.	The **oSMP [REP1-044]** already addresses that where stockpiles may need to remain for more than a year, the project must review whether additional management, permitting or compliance with the CL:AIRE DoWCoP is required. It also requires long-term stockpiles to be managed, inspected, seeded where appropriate, and protected from erosion, compaction and contamination.
PS-D2-07	Section 4.1.29 Cultivating to improve soil drainage post construction will be almost impossible. It is inconclusive that grass will improve soil structure and organic carbon.	The Applicant does not agree that paragraph 4.1.29 **[REP1-044]** is unrealistic. The reference to aftercare is not intended to suggest wholesale cultivation beneath installed arrays after construction. It refers to targeted

Our Ref.	JC Comments	Applicant Response
	The consensus to date is that both are lower underneath panels (Environ. Res Lett .20 (2025) 024003)	restoration of disturbed soils, where testing identifies a need for amelioration, and to deep loosening, subsoiling or ripping of compacted layers before topsoil is re-spread. During operation, the strategy is primarily to avoid compaction by limiting vehicle movements, using access tracks, and only accessing unsurfaced areas when conditions are suitable
PS-D2-08	Section 5.1.5 Trench settlement may take a number of years. Does the applicant have the necessary agreements in place to give access for later reinstatement?	The Applicant can confirm that it has the necessary agreements in place for later reinstatement.
PS-D2-09	Section 5.2.4 Soils will become compacted during replacement even in dry weather. Soil reinstatement will be limited due to the location of the panels. No policy in place.	Paragraph 5.2.4 **[REP1-044]** recognises that replacement works could cause localised compaction from machinery tracking and requires appropriate loosening, such as use of a winged tine subsoiler or deep ripper, and reseeding where soil structure has been compacted. Paragraph 5.2.5 also requires monitoring of reinstated areas, with remedial action where issues such as compaction, waterlogging, erosion or panel drip-line damage are identified. The Applicant accepts that some localised compaction could occur even in dry weather, but replacement works are not expected to involve major soil disturbance, and operational vehicles would primarily use access tracks, with off-track access limited and managed.
PS-D2-10	Section 5.2.6 Little or no evidence that soils will improve under panels (See Section 4.1.29) Erroneous claim.	The Applicant does not agree that paragraph 5.2.6 **[REP1-044]** is erroneous. It should not be read as claiming that soil conditions beneath every individual panel will uniformly improve compared with inter-row gaps. The point is that, at the site-wide level, the operational phase would involve a change from annual arable cultivation to managed grassland.
PS-D2-11	Section 7.3.1. It will be almost impossible to locate field drains from a field drainage plan as most drains are only six to eight inches wide. It will be a futile exercise. How will the applicant know when they have damaged a drain	Paragraph 7.3.1 **[REP1-044]** is not intended to suggest that every individual field drain can be located from historic drainage plans alone. Rather, those plans are one source of information, alongside landowner input, site observation, construction supervision and monitoring during intrusive works.

Our Ref.	JC Comments	Applicant Response
	during piling? Drains found during trenching should be repaired immediately not capped as suggested. All drains are perforated and covered in stone so water would continue to flow. There is no doubt that all damage to drains will not be repaired and full reinstatement will not be possible.	The oSMP requires known drainage plans to be reviewed, anticipated locations of major drains to be marked, and any drains encountered during trenching or piling to be managed. The Applicant has prepared a separate **outline Surface Water Management Plan [REP1-046]** that sets out how the surface water will be managed across the Site during each phase of the authorised development.

2.11 Response to Pauline McCafferty

Table 13: Response to Pauline McCafferty Deadline 2 Submission (REP2-084)

Our Ref.	PM Comments	Applicant Response
PM-D2-01	A significant amount of construction traffic would come through Kimbolton village to access the B660 but Kimbolton isn't included in the video. The problems associated with construction traffic driving through the village of Kimbolton have already been highlighted eg 1000 pupils per day attending Kimbolton School, the tight bends on either side of the village, the parking on both sides of the high street and the significant number of timber framed listed buildings made from daub and wattle and have no foundations.	As is illustrated in the Proposed Construction Access Strategy plan included as Appendix C of the **outline Construction Traffic Management Plan (oCTMP) [REP1-034]**, no construction traffic would be routed through Kimbolton Village.

2.12 Response to Phil Wayles

Table 14: Response to Phil Wayles Deadline 2 Submission (REP2-088)

Our Ref.	PW Comments	Applicant Response
PW-D2-01	Para 2.2.3 stated "Classified turning count and queue length surveys were undertaken at each of these junctions on Wednesday 11th March 2026, covering a 12-hour period between 07:00 and 19:00." This not standard practice and usually clients such as National Highways would commission a 7-day Automatic Traffic Count to check that the day the classified count was done was typical and representative (i.e. there were no incidents or events in the locality that may have affected traffic flows on that particular day).	The Applicant acknowledges this comment but would note that while obtaining ATC data to verify the turning count data may be National Highways' standard practice when commissioning large-scale network models to appraise the impacts of highway improvement schemes, it is not standard practice for modelling capacity and queue lengths at individual junctions. For the purpose of the assessment undertaken, obtaining 12-hour turning and queue length data for a typical weekday is considered to be an appropriate methodology. National Highways has reviewed the assessment and has not raised any concerns regarding the baseline data used in the assessment. Nevertheless, the manual traffic count data has been compared to the baseline ATC data obtained in 2022 for **ES Vol 1 Chapter 9: Traffic and Transport (as updated alongside this submission)**. This indicated average two-way weekday flows between 07:00 and 19:00 of approximately 6,930 vehicles and 3,980 vehicles, respectively, along the B645 and A1 northbound exit/entry slip roads in 2022, compared to approximately 7,060 and 4,000 vehicles on the same roads as observed in the 2026 turning counts. The turning count data is therefore considered to provide a reasonable representation of historic traffic flows through the modelled junctions.
PW-D2-02	Para 2.4.1 states "In order to presents a robust appraisal of the likely impact on the A1 St Neots junction, this assessment has taken into account traffic associated with the proposed High Wood Solar Farm. As described in Section 9.11 of ES Vol 1 Chapter 9 Traffic and Transport [APP 045], this was the only committed development that has the potential to result in any significant cumulative impacts with regard to the impact of construction traffic."	National Highways only requested an appraisal of the impact during the construction phase. The level of uncertainty regarding the level of background traffic and future developments 20 or 40 years into the future is such that it would not be possible to draw any meaningful conclusions from modelling the impacts of replacement and decommissioning activities. However, it should be noted that the level of development traffic associated with replacement activities would be significantly lower than the forecast volume of construction traffic, and the traffic generation during the

Our Ref.	PW Comments	Applicant Response
	This appraisal only considers the construction phase. The appraisal does not consider or model the impact for the operational replacement works and decommissioning works planned some 20-40 years in the future. Traffic flows would be much increased in these future years. The Applicant should generated the traffic forecasts for when the replacement and decommissioning works are planned using the agreed growth factors, and model and assess the impact on queue length and junction capacity.	decommissioning phase would be no greater than during the construction phase. The relative impacts of development traffic during the operational and decommissioning phases would therefore be lower than the impact of construction phase traffic, when set against a likely increase in background traffic flows.
	In the TN, the Applicant states the A1/B645 junction effectively comprises three separate junctions: • A1 northbound exit and entry slip roads form a priority T-junction with the B645 • A1 southbound exit and entry slip roads connect to Great North Road via a mini roundabout junction. • B645/Great north Road/B1048 mini roundabout junction The A1 northbound exit and entry slip roads/B645 part of the junction is modelled using PICADY module within the TRL software package Junctions 10. However, the guidance stated PICADY is used for modelling isolated 3 and 4 arm at-grade junctions, such as crossroads and T-junctions, so it is questionable if PICADY is an appropriated tool for modelling this junction. For example, National Highways were required to build a VISSIM microsimulation model for the Buckden Roundabout for the A428 Black Cat to Caxton Gibbet DCO Examination. Also, the PICADY module has been updated and is now Junctions 11 TRL Software Package.	The Applicant notes this comment but would note that National Highways has not raised any concerns regarding the methodology used in the modelling assessment.

Our Ref.	PW Comments	Applicant Response
PW-D2-03	Para 2.2.4 Updated to add “National Highways will also have a role in ensuring that the CTMP is not breached and that safety at the junction between the A1 and B645 is not compromised with, for example, queuing back onto the A1 mainline.” Important to include National Highways (NH) as a relevant highway authority, but we need to bring to NH (and Cambridgeshire County Council, CCC) attention the requirement to consider the capacity and safety impact of U turning HGV construction traffic at the Wyboston junction, Little Paxton junction and/or Buckden roundabout, as well as the A1/B645 junction.	The Applicant would note that discussions are ongoing with both National Highways and CCC in regard to this matter.
PW-D2-04	Para 5.1.1 adds “To minimise the impact of construction traffic and prevent HGVs from routing through the populated area of Eaton Ford, all construction HGVs will be directed to access the B645 from the A1 using the northbound exit slip, and to access the A1 using the northbound entry slip when departing the Site.” NH must consider the traffic impact at A428B1428 Wyboston roundabout junction (to the south), A1 Little Paxton junction and A1Buckden roundabout (to the north) for U turning HGV construction traffic – a necessary traffic movement as a result of this change in response to a request from CCC. It is also worth noting the A1 southbound merge at Little Paxton is sub-standard, it is actually marked as a Give Way, so has further safety implications for HGV traffic joining the A1 having given way to traffic on the A1.	The Applicant would note that discussions are ongoing with both National Highways and CCC in regard to this matter.
PW-D2-05	Reference to the traffic modelling for the A428 Black Cat to Caxton Gibbet scheme DCO Examination is an important point of reference. For example, NH was	The Applicant would note that there would be a maximum of 30 HGV movements per day in each direction along the A1 during the construction

Our Ref.	PW Comments	Applicant Response
	required to produce a VISSIM modelling assessment for the A1 Buckden Roundabout and an ARCADY assessment was undertaken for the A428 Wyboston Roundabout. The "Wyboston and Barford Road Roundabouts Mitigation Note" prepared by Cambridgeshire County Council for the A428 Black Cat to Caxton Gibbet scheme DCO Examination states "This work showed that both Wyboston and Barford Road roundabouts would be over capacity in 2040 with the introduction of the proposed A428 Black Cat to Caxton Gibbet scheme." Importantly the construction traffic impacts on CCC submission are applicable and relevant for the operational replacement work and decommissioning works. This reinforces the need to model the impact on the Wyboston Roundabout junction. Here is a link to the CCC A428 DCO submission: https://nsip documents.planninginspectorate.gov.uk/published-documents/TR010044-001955-CLA-D10 TN-Technical-Note-on-Wyboston-and-Barford-Road-Roundabouts-8274-9.pdf	phase. This volume of HGV traffic would only occur for a 3-month period. This level of traffic does not warrant the need for junction capacity modelling. Junction capacity modelling at the A1 / B645 St Neots junction was only requested by National Highways to appraise the impact of construction staff movements. Such movements would not be restricted to using only the northbound slip roads at this junction, and so would not need to turn round at any point along the A1.
PW-D2-06	Para 5.1.11 states "Site B also has a number of site access junctions which require construction traffic to use short sections of the public highway along Great Staughton Road (SA03, SA04, SA05, SA06) and Green End (SA09)." Also with reference to Para 5.2.1.and 5.2.2, the Applicant's traffic-flow diagrams appear to assign only minimal construction vehicle movements to the SA03–SA06 Great Staughton Road accesses and SA09 at Green End, despite those accesses serving substantial areas of Site B proposed for solar panel development and	The Applicant would note that the routes to be used by construction traffic, including the proposed sections of public highway that would be utilised, are illustrated on the Proposed Construction Access Strategy plan in Appendix C of the **outline Construction Traffic Management Plan (oCTMP) [REP1-034]**. The routes illustrated on this plan constitute the permitted routes. All routes not shown on this plan would be classified as restricted routes, and any vehicles found to be using any restricted routes would constitute a breach of the oCTMP. The Applicant would also note that the volume of traffic forecast to require access to accesses SA03, SA04, SA05, SA06 and SA09 was calculated

Our Ref.	PW Comments	Applicant Response
	two of the satellite compounds. The Indicative Site Access Drawings in Appendix D also include swept path tracking diagrams for these accesses. The application does not transparently explain how the site areas accessed by SA03, SA04,SA06 and SA09 can be constructed with such limited access movements especially as road widening is required at some locations. This creates uncertainty as to whether the traffic assessment materially understates localised construction activity on Great Staughton Road and Green End Road. The satellite compound near Green End should be accessed by and internal haul road, rather than by public highway and site access SA09. This emphasises the oCTMP does not explicitly and clearly set out which existing roads will be used by construction traffic, nor does not show comprehensive details for as requested by the Local highways Authorities and several IPs. A Construction Traffic Permitted Routes / Restricted routes must be prepared for the whole area bounded by the A1, A14, Bedford to the south and B660 / Swineshead Road to the west.	based on the proportion of site area served by each of these accesses relative to the total area of Site B. **ES Vol 2 Appendix 9-1 Transport Assessment Rev [as updated alongside this submission]** has been updated to provide further clarification on this point.
PW-D2-07	Para 5.1.13 has been updated to “Minor road widening works will also be required along Spring Hill Road, and potentially Great Staughton Road, to facilitate the two-way movement of HGVs between access SA12 and access SA10 during the construction phase.” As described at the ISH, this requires HGV construction traffic to travel on sections of Great Staughton Road and Spring Hill Road between these 2 accesses (SA10 and SA12) rather than use an internal haul road between Sites B and C. The change to use a section of the public highway was introduced in the Stat Con documentation, although	The Applicant notes this comment but has had to balance practical, safety, land ownership and environmental considerations in developing the construction access strategy. This has included the need to avoid unsuitable routes and settlements where practicable, provide safe and deliverable access to each part of the site, limit unnecessary temporary land take that cannot be justified for compulsory acquisition, and avoid other environmental impacts.

Our Ref.	PW Comments	Applicant Response
	difficult to interpret. At Non-Stat Con, the Applicant intended to use the internal cabling corridor for temporary construction access (haul road). It is illogical and inappropriate to use and widen the existing public highway when a perfectly sensible alternative exists using an internal haul road to be built along the cable route between Sites B and C as shown on Figure 15 - Proposed Construction Access Strategy in Appendix C (see extract below). This plan indicates there is a temporary haul road along the cabling corridor route which is due to be removed post- construction. Mandating use of this section of temporary haul road would improve safety and limit damage to the existing roads by keeping large and heavy site vehicles off the public highway. Furthermore, there would be further disruption to traffic during the construction of the widening works, and this section of the public highway would be also used during the operational replacement works and decommissioning works. This disruption also applies to the road widening works required at several of the new proposed site accesses to accommodate the HGV swept path tracking shown on the Indicative Site Access Drawings.	
PW-D2-08	The location of site accesses and associated visibility splay is a concern for BBC as set out in their LIR at Section 6.5 (Matter 8 – vegetation clearance), Section 9.2 (Matter 20 – Hedgerow Regulations and Inclosure Act), Section 9.5 (Matter 22 – visibility splays), Section 9.39 (Matter 37 - BNG), Section 11.14 (Matter 47 – LIR, construction phase), Section 11.17 (Matter 50 - visibility splays), Section 11.24 (Matter 53 – vehicle tracking) and Section 11.27 (Matter 56 – DCO Agreement: Highways). The impacts of hedgerow removal for construction and	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 [REP1-034]**. The site access arrangement drawings included within Appendix D of the **oCTMP [as updated alongside this submission]** have been updated to illustrate the extent of hedgerow that would be impacted by the Site access points.

Our Ref.	PW Comments	Applicant Response
	required visibility splays at some accesses and crossing points and results in greater loss of hedgerow and habitat removal than stated and assessed by the Applicant in the ES. BBC want to see that the worst-case scenario tested (Matter 22 c) ii.)	
PW-D2-09	A new section - Section 5.8 – has been added relating to "Highway Condition Survey". Para 5.8.1 states "A pre-construction highway condition survey will be undertaken on the local highway network prior to commencement of the construction phase. The extent of the survey will be agreed with the Local Highway Authorities prior to commencement." 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. The highway condition surveys must also be undertaken before and after the operational phase replacement works and decommissioning works. This is confirmed by both Local Highway Authorities in their Local Impact Reports (LIR) [BBC LIR at Section 11.3 (Matter 46) and CCC LIR at Paras 2.5.36 and 2.5.43].	The Applicant notes this comment. As stipulated in paragraph 2.4.10 of the **outline Operational Environmental Management Plan [REP1-036]**, details of measures to manage the impact of traffic generated by large-scale replacement activities (defined as the replacement of more than 20% of solar panels within any 12-month period) will need to be submitted to the local highway authorities for approval prior to undertaking those replacement activities. These measures should be consistent with the principles of the approved CEMP, PRoWMP, CTMP and OEMP. This would include for undertaking highway condition surveys. Paragraph 2.5.2 of the **outline Decommissioning Environmental Plan [REP2-030]** also requires that a specific Decommissioning Traffic Management Plan must be submitted to and approved by the local highway authorities prior to any decommissioning activities taking place. The measures that would be included within the DTMP would be consistent with the principles of the approved CTMP.
PW-D2-10	Further to Section 5.8.5, mud on the road is a safety hazard and a road sweeper vehicle must be on site all the times to clear mud off the road promptly after being left by construction vehicles.	Section 7.1 of the **oCTMP [REP1-034]** identifies that wheel wash facilities will be provided within each of the construction compounds. This section also stipulates that residual deposits of dust or dirt would be removed regularly using road sweepers.
PW-D2-11	Para 6.1.4 adds "Delivery vehicles will also be allocated an anticipated departure window, based on expected on-Site turnaround times." and Para 6.1.4 adds "Only vehicles with a confirmed time slot allocation will be	Section 9.1 of the **oCTMP [REP1-034]** sets out the proposed monitoring strategy, and Section 9.3 outlines the proposed strategy for enforcement and corrective measures. The requirement to implement an approved detailed

Our Ref.	PW Comments	Applicant Response
	permitted to attend the Site." It is unclear how this will be monitored, managed and enforced, and secured in the DCO.	CTMP, which must be in substantial accordance with the oCTMP, is secured under Requirement 8 of the **draft DCO [REP1-005]**.
PW-D2-12	Para 9.1.3 had been added "At the time of writing, investigations are ongoing into the feasibility and potential to introduce an automatic number plate recognition (ANPR) system or a GPS based geofencing system to help monitor and enforce the prescribed HGV delivery routes. If feasible, this will be developed further as part of future updates to this oCTMP or the final CTMP." This requirement must be secured though the DCO. NH has been added as a key stakeholder in Section 9.3 "Enforcement and Corrective Measures". The Local Highways Authorities have requested a monitoring fee in their LIRs.	The Applicant notes this comment. The requirement to implement an approved detailed CTMP, which must be in substantial accordance with the **oCTMP [REP1-034]**, is secured under Requirement 8 of the **draft DCO [REP1-005]**.
PW-D2-13	The working hours are set out at Para 3.1.2. These timings for construction activities must include the "warming up" period for construction plant to avoid excessive and unacceptable noise early in morning before 0800, for example relating the satellite compounds at Green End in Little Staughton and near The Kangaroo.	Timings for construction activities are secured under Requirement 17 of the **draft DCO [REP1-005]**. This identifies that this restriction applies to all activities which would cause audible noise at the Site boundary.
PW-D2-14	The Applicant sets a target for car occupancy of 2 workers per vehicle at Section 6.1. National Highways stated in their Relevant Representation at Section 4.3.4 "…the Applicant is assuming a car/van occupancy of 2. It is noted that this is a high car share assumption and that a figure of 1.4 has been commonly used as the basis for travel planning on several recent consented and live DCOs for energy projects in rural locations. A car share assumption of 1.4 would result in a significant increase in	The Applicant would note that an appraisal of the environmental impacts of construction traffic resulting from a car occupancy of 1.4 was presented in the **Technical Note on Impact on B645-A1 St Neots Junction [REP1-066]**. This identified that there would be no significant effects in EIA terms resulting from the increase in traffic resulting from the change in assumed average staff car occupancy level.

Our Ref.	PW Comments	Applicant Response
	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. This significant increase in the number of vehicles transporting workers to and from the site each day, including Saturdays, is concerning because of the additional noise and disruption.	
PW-D2-15	Despite the Applicant setting details for site accessibility and promoting active travel, there are no guarantees that site workers are going to use the public bus service nor walk or cycle to work. Nor is this secured or mandated in the oCWTP.	The Applicant notes this comment. Given the rural nature of the Site, it is not anticipated that substantial numbers of construction staff would realistically be expected to travel to the Site by public bus, walking or cycling, and this is reflected in the Travel Plan measures, which are predominantly focussed on the implementation of car sharing and a minibus shuttle service. However, it would be remiss to exclude measures related to encouraging uptake of walking, cycling and public bus where practical, particularly in an outline document when the location of construction staff origins is not known.
PW-D2-16	Appendix C: Proposed Construction Access Strategy has been added. This does not show comprehensive details for permitted routes / restricted routes for construction traffic – as requested by the Local highways Authorities and many IP’s. As confirmed by [redacted] on behalf of Bedford Borough Council at the ISH, detailed permitted routes and restricted routes plans for construction vehicles should be produced and agreed with the local highways authorities. This is a standard requirement for NSIP schemes. The permitted and restricted routes requirements must be monitored and enforced and align with the Design Approach Document which identifies constraints at Section 4.2.55 ”Access to the Site avoiding narrow routes through villages of Great Staughton, Little Staughton, Keysoe, Pertenhall and Swineshead.”	The Applicant would note that the routes to be used by construction traffic, including the proposed sections of public highway that would be utilised, as illustrated on the Proposed Construction Access Strategy plan in Appendix C of the **outline Construction Traffic Management Plan (oCTMP) [REP1-034]**, constitute the permitted routes. All routes not shown on this plan would be classified as restricted routes, and any vehicles found to be using any restricted routes would constitute a breach of the CTMP.

Our Ref.	PW Comments	Applicant Response
PW-D2-17	Appendix D: Indicative Site Access Arrangement Drawings has been added. These show geometric design parameters for each access and crossing. Visibility splays and swept path tracking for rigid and articulated HGVs. The access / crossing designs, existing carriageway widths and fencelines are based on OS Mastermap data. The design should be based on topographical survey data, so the design details are based on accurate road location / width, roadside drainage features, road furniture such as traffic signs, trees and hedgerow position and width. These drawings therefore do not accurately show the extent of works and greater lengths of road widening and hedgerow trimming/removal to achieve the necessary visibility splays. The latter point was raised by the local highway authorities such as BBC in their LIR at Section 11.17 a) iii. The extent of hedgerow removal is already understated in the environmental assessment and impacts of the BNG calculation. Additionally, and as set out above, Sections 5.4.2 and 5.4.3 say the visibility splays at each proposed access are Design Manual for Roads and Bridges (DMRB) compliant. This requirement was requested by BBC at Section 11.17 (Matter 50) and this section highlighted that DMRB visibility splay standards were more onerous than those using Manual for Streets (MfS) criteria. However, some plans in Appendix D still show visibility splays including for Accesses SA14, SA15, SA17, SA18, SA19 and SA20 designed to MfS standards. This potentially makes the access less safe and would require greater lengths of hedgerow removal or trimming.	The site access arrangement drawings included within Appendix D of the **oCTMP [as updated alongside this submission]** have been updated to illustrate the extent of hedgerow that would be impacted by the Site access points. The use of Manual for Streets visibility splays is only proposed at accesses SA14, SA15, SA17, SA18 and SA19 on the basis that it is not possible to achieve full DMRB visibility splays at these locations. These accesses would only be used during the construction phase, and it is proposed that vehicle movements at these accesses would be controlled through the implementation of temporary speed limits on Moor Road, Duloe Lane and Bushmead Road, alongside temporary traffic management, as shown in the **Traffic Regulation Measures Plan [REP1-004]** and the access arrangement plans included in Appendix D of the **oCTMP [as updated alongside this submission]**.

2.13 Response to Sara Knightley

Table 15: Response to Sara Knightley Deadline 2 Submission (REP2-092)

Our Ref.	PW Comments	Applicant Response
Outline Construction Traffic Management Plan [REP1-034]		
SK-D2-01	The applicant maintains that peak traffic hours are 8-9am and 5-6pm however there are a lot of traffic movements before 8am (school and commuter runs - How does the applicant propose to restrict the traffic movements to outside of the hours of 8-9am and 5-6pm?	Construction HGV movements would be timed to occur outside of the highway peak hours through the implementation of a Delivery Management System, which would require all deliveries to be booked in with an allocated delivery time slot, as described in Section 6.1 of the **outline Construction Traffic Management Plan [REP1-034]**.
SK-D2-02	4.2.6 Many of the roads on the proposed route are not wide enough to take two HGV's coming in opposite directions eg Spring Hill, Moor Road - what instructions will be given to drivers in this instance (grass verges run along most of these roads and are not suitable for lorries)?	No construction traffic would be routed along the length of Moor Road during the construction phase. All construction traffic would cross directly over Moor Road between accesses SA14 and SA15. These movements would be controlled through temporary traffic management, including banksmen. Carriageway widening is proposed along Spring Hill to facilitate safe two-way movement of HGVs, as illustrated in Figure 7 in Appendix D of the **oCTMP [REP1-034]**.
SK-D2-03	4.2.7 Has the emissions from all the additional traffic journeys to be made by staff been included in the carbon saving calculations?	The greenhouse gas (GHG) emissions associated with the travel of workers has been calculated within **ES Vol 2 Appendix 15-1 Greenhouse Gas Emissions Assessment P02 [REP2-021]** and presented within **ES Vol 1 Chapter 5 Climate Change P02 [REP2-012]**. The travel of workers results in emissions of 3,921 tCO_2e during operation and 6,061 tCO_2e during construction and decommissioning. During operation, the travel of workers has been calculated 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;

Our Ref.	PW Comments	Applicant Response
		• Working days per role: 232 days per year; and • Lifetime of Scheme: 40 years. During construction, the travel of workers has been calculated 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. It must be noted that the travel of workers during decommissioning has been assumed to be the same as construction at this stage.
SK-D2-04	4.5 Sustainable travel plans should be identified pre DCO and not after	The Applicant has prepared an outline Construction Workers Travel Plan which is attached at Appendix B of the **outline Construction Traffic Management Plan [REP1-034]**. This sets the framework by which future travel plans would be required to come forward post-consent.
SK-D2-05	7.1.1 Where will the water for the wheel washing facilitity come from? If bowsers or other supplies need to be brought in has the emissions from these been included in the calculations?	The water would be delivered to wheel washing facilities from the main construction compound in Site D using bowsers.
SK-D2-06	7.1.2 Again have the emissions from the road brushing vehicles been included in the calculations?	The **outline Construction Traffic Management Plan [REP1-034]** has stated: 'Any residual deposits of dust or dirt on public roads would be removed regularly using road brushes and vacuum road sweepers.' The GHG emissions associated with the road brushes and vacuum road sweepers has not been calculated within **ES Vol 2 Appendix 15-1 [REP2-021]** or presented within **ES Vol 1 [REP2-012]**. This is due to the lack of information at this stage to support a reasonable and accurate calculation. Uncertainties include the frequency of their use, the total distance of road they would need to cover. It is anticipated that the road brushes and vacuum

Our Ref.	PW Comments	Applicant Response
		road sweepers could be EV powered and as such any GHG emissions would be de minimis, but they could be calculated if further information becomes available.
SK-D2-07	9.1.4 Stage 3 of the failure to adhere to road management plan states "removal of relevant party from site" this should state "permanent" removal.	The Applicant notes this comment. The enforcement section of the oCTMP has been updated to provide further detail of the proposed sanctions that would be imposed in the event of any breach of the CTMP.
AIL Access Report (Appendix A of Outline Construction Traffic Management Plan [REP1-034])		
SK-D2-08	For the largest of the vehicles a police escort and possible complete road closures will be required for the section just after Hail Weston to Site D and beyond if necessary. What advance notification will be given to other road users?	Advance notification of Abnormal Load deliveries would be provided in accordance with the requirements of the Road Vehicles (Authorisation of Special Types) (General) Order 2003.
SK-D2-09	Route 1 map shows vehicles being directed southbound beyond the B645 to the Black Cat roundabout and then northbound up the A1. There are major roadworks at the Black Cat junction what provision which may need to be considered. What measures are being put in place to ensure southbound A1 traffic does not leave the A1 at the B645 exit.	The Applicant would note that it is assumed that the current ongoing roadworks associated with the construction of the A428 Black Cat to Caxton Gibbet scheme would be complete prior to the commencement of the construction phase of the Scheme. This assumption is supported by National Highways. The route map shown in the AIL Access Report only relates to Abnormal Load Movements. These movements are bound to the approved route by the terms of the route agreement in the signed Special Order.
Drive Through of Local Highway Network P01 [REP1-068]		
SK-D2-10	I am concerned that the main site access at Site D is very close to a bend giving restricted viewing to approaching vehicles at this junction. What provision has the Applicant made for appropriate signage?	The Applicant would note that the available visibility splays at the main Site access (SA16) are in accordance with the required minimum visibility as set out in the Design Manual for Roads and Bridges. No additional signage is considered necessary at this location.

Our Ref.	PW Comments	Applicant Response
SK-D2-11	Site access to SA05 is to be approached from Green End but there is no mention as to how the vehicles get to Green End? The road from Green End to Spring Hill passes through a housing area and there is a very sharp bend just after the left hand turn out of Green End again with restricted vision.	As shown in the Proposed Construction Access Strategy plan in Appendix C of the **oCTMP [REP1-034]**, access to Green End will be via the proposed new Site access track through Site B, via a short section of temporary access track connecting to Spring Hill via Access SA10.
SK-D2-12	Site Access SA06 is to be approached from Green End but there is no mention as to which routes vehicles need to take to get to Green End. Also how will this be monitored and enforced?	As shown in the Proposed Construction Access Strategy plan in Appendix C of the **oCTMP [REP1-034]**, access to Green End will be via the proposed new Site access track through Site B, via a short section of temporary access track connecting to Spring Hill via Access SA10. Section 9.1 of the **oCTMP [REP1-034]** sets out the proposed monitoring strategy, and Section 9.3 outlines the proposed strategy for enforcement and corrective measures. The requirement to implement an approved detailed CTMP, which must be in substantial accordance with the oCTMP, is secured under Requirement 8 of the **draft DCO [REP1-005]**.
SK-D2-13	Where traffic is crossing a road to get from one site to another (eg SA08 & SA07) how will this be managed? Traffic lights? “some construction traffic” expected at the Kangaroo junction – how will the Applicant ensure that is kept to a minimum?	Section 5.5 of the **oCTMP [REP1-034]** identifies that traffic management at each of the identified crossing points would either be through temporary traffic signals or the use of banksmen with ‘Stop / Go’ boards. It is also identified that the exact details of the traffic management measures to be implemented at each location would be submitted for approval by the relevant local highway authority for approval prior to implementation. Construction vehicle movements will be kept to a minimum through the implementation of the measures set out in the CTMP, in line with the primary objectives of the oCTMP as set out in paragraph 1.1.5 and secured under Requirement 8 of the **draft DCO [REP1-005]**.
SK-D2-14	the video states that traffic will turn right onto the B660. The point at which the video starts traffic would need to turn left onto the B660 – can the Applicant please clarify.	The Applicant would note that the video drive through was prepared for illustrative purposes only, to provide a visual illustration of the location of the proposed Site accesses for the benefit of and as requested by the Examining

Our Ref.	PW Comments	Applicant Response
	The junction where the video starts Great Staughton Road and the B660 (Green End Crossroads) has very very restricted visibility and without other measures in place would be a very dangerous point for large slow moving vehicles to enter the B660.	Authority. As shown in the Proposed Construction Access Strategy plan in Appendix C of the **oCTMP [REP1-034]**, access to the B660 will be via the proposed access SA02 via the proposed new Site access track through Site B and a short section of temporary access track connecting to access SA02.

2.14 Response to Simon Beverly

Table 16: Response to Simon Beverly Deadline 2 Submission (REP2-094)

Our Ref.	SB Comments	Applicant Response
SB-D2-01	Since the Secretary of State's decision on the Mallard Pass project the Government (and the Secretary of State) have specifically legislated in the GB Energy Act for "measures ensuring that slavery and human trafficking is not taking place in its business or supply chains". This is now the law, it should apply equally to a small enterprise as to a large one. It is therefore incumbent on the applicants and the inspector to ascertain there is no forced labour within the supply chain. There is no justification for scoping-out such proof or requirement now the new law exists. No such precedent can be assumed from that Mallard Pass enquiry which preceded the introduction of the GB Energy Act. Would the Examining Authority please therefore ensure this matter is not scoped-out?	The Secretary of State is required, by section 104 of the Planning Act 2008 (decisions in cases where national policy statement has effect), to have regard to the following matters when deciding an application for development consent: • any national policy statement which has effect in relation to development of the description to which the application relates; • the appropriate marine policy documents (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009; • any local impact report (within the meaning given by section 60(3)) submitted to the Secretary of State before the deadline specified in a notice under section 60(2); • any matters prescribed in relation to development of the description to which the application relates; and • any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision. Section 104(3) provides that the Secretary of State must decide an application for development consent in accordance with the relevant national policy statement unless one of the exceptions listed at sections 104(4) to (8) apply, which includes circumstances where the decision would lead to the UK breaching its international obligations or the Secretary of State breaching their own statutory obligations. Additionally, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires that the Secretary of State must, when deciding

Our Ref.	SB Comments	Applicant Response
		whether to make an order granting development consent for EIA development: examine the environmental information; • reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to in sub-paragraph (a) and, where appropriate, any supplementary examination considered necessary; • integrate that conclusion into the decision as to whether an order is to be granted; and • if an order is to be made, consider whether it is appropriate to impose monitoring measures. Subject to those matters that must be considered in each case, the Secretary of State has a wide discretion to determine what is important and relevant to their decision. In this context, the Secretary of State in the Mallard Pass decision considered that ethical procurement was not a relevant planning matter in itself in the determination of the application (see paragraph 4.107 of the Secretary of State's decision letter for Mallard Pass **[EN010127]**). The Applicant has reviewed the Great British Energy Act 2025 (the "Act") referred to by Mr Beverly and notes that the passage referred to (i.e. *"Great British Energy's objects are restricted to facilitating, encouraging and participating in"*) is a limit placed on that object of that specific company under section 3(2) of the Act. It is not a wider statutory requirement that would be applicable in this case, and as such it should not alter the line of reasoning behind, or the continued applicability of, the Secretary of State's decision in Mallard Pass. It is therefore submitted that the position taken by the Examining Authority in the **Rule 6 letter** [**PD-005]** is not misplaced.

2.15 Response to Sue Sheard

Table 17: Response to Sue Sheard Deadline 2 Submission (REP2-107)

Our Ref.	SS Comments	Applicant Response
SS-D2-01	The Applicant's Outline Construction Management Plan (Sections 5.1.8 and 5.2.1–5.2.2) identifies multiple access points serving Site B from Great Staughton Road (SA03, SA04, SA05 and SA06), including the upgrading of existing field gate accesses to accommodate construction traffic. However, the accompanying traffic-flow information appears to assign only minimal construction vehicle movements to these access points, despite the scale of development proposed. In particular: • SA03 serves approximately 4 hectares • SA04 serves approximately 6.25 hectares • SA06 serves approximately 20 hectares The application does not explain how these areas can be constructed with such limited access movements. For clarity, a detailed breakdown of construction traffic by access point and activity type (including HGVs, deliveries, staff vehicles and plant) is required, rather than aggregated site-wide totals. The application does not: • Break down construction logistics by access point • Explain delivery volumes or frequency	The Applicant would note that the volume of traffic forecast to require access to accesses SA03, SA04, SA05, SA06 and SA09 was calculated based on the proportion of site area served by each of these accesses relative to the total area of Site B. **ES Vol 2 Appendix 9-1 Transport Assessment [as updated alongside this submission]** has been updated to provide further clarification on this point. The Applicant would also note that the parcels of land served by access SA03, SA04, SA05 and SA06 comprise only 12% of the total area of Site B. A detailed breakdown of construction traffic by site access and activity type would be included within the final CTMP once the detailed construction programme has been prepared by the appointed contractor.

Our Ref.	SS Comments	Applicant Response
	• Clarify workforce access arrangements • Identify plant and machinery movements • Set out any internal haul or distribution strategy	

2.16 Response to Stop East Park Energy (SEPE)

Table 18: Response to SEPE Deadline 2 Submission (REP2-100 / REP2-102)

Our Ref.	SEPE Comments	Applicant Response
Comments on any updated or additional documents from the Applicant: Applicant's drive-through of local highway network [REP2-102]		
SEPE-D2-01	In summary, the drive-through video falls short of providing a robust or representative assessment of the proposed construction traffic routes. The cumulative effect of the omissions identified – including incomplete route coverage, lack of contextual information, absence of realistic traffic conditions, and failure to address key hazards and access points – significantly undermines its evidential value. Of particular concern is the potential for safety risks to be understated, especially given the reliance on a simplified and non-bidirectional representation of vehicle movements and the omission of critical junctions and local access routes. When considered alongside the scale and nature of anticipated construction traffic, including heavy goods vehicles and abnormal loads, these gaps are material. It is therefore recommended that a more comprehensive and transparently evidenced assessment is undertaken. This should include full route mapping, representative traffic conditions, two-way vehicle movements, and detailed consideration of all affected roads, junctions and receptors, including proposed construction access points where they interact directly with the public highway, in	The Applicant prepared the drive through of the local highway network at the request of the Examining Authority. The video has been provided to give context to the affected sections of highway, and is not intended as an 'assessment'.

Our Ref.	SEPE Comments	Applicant Response
	order to provide a more reliable basis for evaluating traffic and safety impacts.	
SEPE-D2-02	1. Repeated systemic issue: thematic coding dilutes individual concerns The document explicitly states that representations were "coded… identifying common themes" rather than addressed individually. This approach aggregates distinct concerns, potentially masking site-specific impacts, cumulative localised effects and unique or technical objections, specifically 1 ignoring concerns identifying detailed data or assumption issues. It enables generic responses that may not reflect the nuance of original representations. Key deficiency: no transparent audit trail showing how each representation was interpreted or whether any points were excluded, merged or reinterpreted. This creates a risk of procedural unfairness: participants cannot verify whether their concerns were accurately considered.	The Applicant refers SEPE to paragraph 8 of the Planning Inspectorate's Preliminary Meeting Note dated 17th March 2026 **[EV4-003]** within which the Examining Authority confirmed that he is happy for the Applicant to respond to relevant representations in a thematic fashion. Thus, the approach taken by the Applicant is entirely aligned with what was agreed during the Preliminary Meeting. In terms of the comment on the 'audit trail', please refer to Appendix A of the Applicant's thematic response [**REP1-056],** which sets out each of the relevant representations and how they have been individually coded. This should afford any respondent the ability to review the coding and ensure their comments have been considered. Finally, the Applicant would also point out that their thematic response forms part of an ongoing written examination process, if SEPE or any other individual does not consider a specific point has been addressed by the Applicant's thematic responses, they retain the ability to put them forward as part of the on-going process. It is not accepted that there is any risk of procedural unfairness or lack of opportunity for participants to provide further comment.
SEPE-D2-03	2. Repeated reliance on 'policy need' to override local concerns Across multiple themes (eg excessive scale, energy efficiency, alternatives), the Applicant repeatedly deflects concerns by citing Net Zero obligations, national policy (NPS EN-1 / EN-3) and energy security arguments.	At no point is the Applicant suggesting that the Scheme's NSIP status, of itself, addresses the planning balance, without a robust consideration of the benefits and harm from the Scheme. This position is explained further below. The Applicant has provided a suitable and proportionate statement of need in Section 2 of the Planning Statement **[APP-031]**. However, in short, paragraphs 3.2.6 to 3.2.8 of NPS EN-1 state that:

Our Ref.	SEPE Comments	Applicant Response
	This is not a direct response to representations. It substitutes policy justification for impact rebuttal. Examples of minimisation include efficiency concerns answered with "solar is part of policy mix"; alternatives (eg rooftop solar) dismissed as insufficient without providing evidence; energy timing/output concerns set aside by restating national need but without technical modelling. The scheme's high installed solar+battery capacity is framed as an 'energy security' benefit without reference to either the low load factors of UK solar power, or its diurnal or seasonal intermittency. Similarly, in a further instance of material minimisation, the commercial operation of the BESS is not addressed in response to specific points raised in representations. The potential for arbitrage-driven operation to exploit, rather than reduce, price volatility is not examined. Key deficiency: failure to engage with specific local harms vs national benefit balancing and whether this scheme, at this scale, in this location is justified. This raises a question as to whether sufficient weight has been given to the relationship between asserted national benefit and the specific local harms identified in Relevant Representations, a matter the Examining Authority may wish to scrutinise.	"*The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there's a need for those types of infrastructure which is urgent, as described for each of them in this Part.* *In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008. The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS."* Accordingly, there is a clear and urgent need for the Scheme, established by Government, and the Applicant is not required to establish a particular need case for this Scheme, although, as above, they have elected to provide a statement of need in their **Planning Statement [APP-031]**. As stated above, the Applicant recognises that the NPS's require the decision-maker to consider both the benefits and the adverse effects of a proposal, and that national need does not remove the requirement to avoid, reduce and mitigate harm where possible. In developing the Scheme, the Applicant has applied the mitigation hierarchy from the outset. This is set out within topic-specific chapters of the Environmental Statement and summarised within Section 7 of the **Planning Statement [APP-031]**. The national need position (and all other benefits of the Scheme) is balanced by the Applicant against any disbenefits of the scheme in Section 8 of the **Planning Statement [APP-031]**. It does so in a way that recognises it is a matter of weight within the overall planning balance, rather than an overriding determinative factor that creates a mandate for unacceptable local impacts. Finally, the Applicant also notes that there is no policy requirement for them to have evaluated the benefits of solar technology relative to other deployment models – this is considered to have been done by Government in producing the targets set out in the Clean Power 2030 plan, and other

Our Ref.	SEPE Comments	Applicant Response
		strategies referenced within the statement of need at Section 2 of the **Planning Statement [APP-031]**.
SEPE-D2-04	3. 'Addressed elsewhere' – deflection rather than response The Applicant's submission frequently redirects issues to other documents or sections (eg ES chapters, other responses) rather than addressing them substantively. For example, flooding "see FRA and oSWMP"; ecology "assessment concludes no significant effects". This creates a fragmented response structure, forcing readers to navigate multiple documents and with no synthesis or clear rebuttal. Key deficiency: no integrated response to key objections and no demonstration that concerns were understood or that conclusions were changed as a result. This raises a question as to whether the responses demonstrate, in a sufficiently transparent way, how regard has been had to the substance of the representations.	The DCO examination is a predominantly written process, and it is not unreasonable for an Applicant to refer to other documents when they address a specific point / comment.
SEPE-D2-05	4. Hydrology and flood risk: assertion without independent validation The Applicant states that runoff rates "would not be changed", mitigation is sufficient and that additional modelling is "awaiting confirmation" from the EA. Key conclusions rely on outline plans (oSWMP, oCEMP) and future approvals. Critical evidence (EA agreement) is not yet secured.	In response to the relevant representations received from the EA the Applicant prepared a **Hydraulic Modelling Report [REP1-067]** to include pluvial hydraulic modelling for the scheme. The modelling has been reviewed by the EA, and they have subsequently confirmed in their response to examination Deadline 2 **[REP2-053]** that the supplementary information supplied by the Applicant is 'satisfactory in addressing their concerns'.

Our Ref.	SEPE Comments	Applicant Response
	Ignored or minimised concerns include localised drainage patterns, long-term soil compaction effects and cumulative runoff from large-scale panel coverage. Key deficiency: over-reliance on post-consent controls and monitoring rather than prevention. This may limit the extent to which potentially significant effects have been fully assessed at application stage, which the Examining Authority may wish to examine further.	
SEPE-D2-06	5. Ecology: 'No significant effects' without addressing disagreement The Applicant concludes that there are "no residual significant adverse effects" and that there are "beneficial effects for many receptors". This directly contradicts many representations but does not explain why the Applicant believes representations are wrong and does not address specific species or habitats raised. Minimisation patterns include reframing concerns as already assessed or within agreed scope. Key deficiency: no engagement with uncertainty in ecological modelling, survey limitations or seasonal variability. This suggests a closed evidential loop: the ES is treated as definitive rather than contestable. The issue raised here is not simply disagreement on the merits, but whether the Applicant's responses engage	The Applicant remains confident in the assessment of impacts within **ES Vol 1 Chapter 7 [APP-043]**, which has been informed by ecological survey in line with best practice guidance and prepared following established guidelines, including CIEEM Guidelines for Ecological Impact Assessment. Through both embedded and additional mitigation measures residual adverse effects on all ecological receptors have been reduced to negligible or non-significant levels. The Scheme would result in beneficial effects to some ecological receptors, achieved through implementation of the landscape design and ecological enhancement. This is evidenced through the biodiversity net gain calculations **[REP1-052]** which indicates gains of +77.85% in habitat units. +36.91% in hedgerow units and +5.95% in watercourse units. Biodiversity Net Gain represents a standardised and agreed method of demonstrating biodiversity uplift. This is reflective of the ecological and landscape design and implementation of the mitigation hierarchy, which has sought to avoid impacts where reasonably practicable. The Applicant has responded to concerns relating to ecology through detailed **Responses to Relevant Representations of Host Authorities, Statutory Environmental Bodies and Other Interested Parties [REP1-**

Our Ref.	SEPE Comments	Applicant Response
	substantively with the uncertainty and contrary evidence identified in the representations.	**055]** alongside thematic responses **[REP1-056]**. The Applicant has also responded at Deadline 2 to Written Representations **[REP2-044]**, including a detailed response to Stop East Park Energy **[REP2-045]** and at Deadline 3 through this document. Representations received from a variety of parties has resulted in revised documentation, including an outline Farmland Bird Mitigation Strategy incorporated within the **Outline Landscape and Ecological Management Plan [REP2-032]**, revisions to the Outline Construction Environmental Management Plan **[REP2-028]** and a revised Biodiversity Net Gain Report **[REP1-052].** This demonstrates proactive engagement with the consultation process. In the absence of further detail, it is unclear what 'uncertainty in ecological modelling, survey limitations or seasonal variability' is in reference to, and specific commentary cannot be provided.
SEPE-D2-07	6. Infrastructure and traffic: downplaying local experience and technical detail concerns The Applicant concludes impacts are "negligible or minor" and "not significant in EIA terms". This relies on modelling assumptions and mitigation plans (eg CTMP). The Applicant ignores or minimises issues relating to cumulative traffic across villages, behavioural reality (non-compliance with routing), strain on local services, and specific concerns raised over assumptions and the details of key modelling. Key deficiency: no sensitivity analysis for worst-case scenarios or peak construction periods.	The Applicant remains confident in the assessment of impacts within **ES Vol 1 Chapter 9 [REP2-010]**, which has been undertaken in line with best practice guidance and prepared following established guidelines, principally the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement (2023). Through both embedded and additional mitigation measures residual adverse effects on all traffic and transport receptors have been reduced to negligible or non-significant levels. As set out in paragraph 9.8.16 **[REP2-010]** the assessment was undertaken for three assessment scenarios, which included the period of maximum HGV trip generation and the period of maximum construction staff trip generation. As set out in the forecast construction trip generation schedule in Annex C of **ES Vol 2 Appendix 9-1 Transport Assessment [REP2-019]**, these periods of maximum trip generation would not be coincident.

Our Ref.	SEPE Comments	Applicant Response
	There is also limited evidence within the responses of independent verification or testing of contested assumptions raised in the representations. The response prioritises model outputs over lived local conditions. It overlooks questions relating to critical technical details.	
SEPE-D2-08	7. Safety and BESS: overconfidence in future controls The Applicant relies heavily on its outline Battery Safety Management Plan, future approvals and compliance with standards, and refers to its battery system as a "safe and proven technology". Responses assume that future design will resolve risks and that regulatory compliance equals acceptable risk. Ignored or minimised concerns include examples cited of real-world incidents of recent BESS and other lithium-ion battery fires, both internationally and in the UK, emergency response capacity in rural areas, and cumulative risk with large-scale deployment. Key deficiency: no quantitative risk assessment presented and no worst-case scenario analysis. This appears to place substantial reliance on post-consent controls in relation to matters some representations contend should be more fully examined at consent stage.	The Applicant has already prepared a detailed response to this matter in Table 3 (Applicant Response to 'Procedural Deficiencies' identified by SEPE) of their **Response to Stop East Park Energy [REP2-045].** The Applicant does not consider there is any need for a separate Quantified Risk Assessment and Emergency Response Assessment Package.
SEPE-D2-09	8. Socioeconomic and community impacts: selective framing Examples include food security concerns dismissed based on national land proportions, and the community benefit	Firstly, as clearly set out in Section 8 of the **Planning Statement [APP-031],** the Applicant is not relying on the community benefit fund as mitigation, nor are they counting it in the planning balance in favour of the scheme.

Our Ref.	SEPE Comments	Applicant Response
	fund framed as mitigating widely expressed community impacts. Key deficiency: no serious engagement with displacement of local agricultural activity, cumulative land-use change or distributional impacts. This may reflect strategic minimisation through scale framing, a matter the Examining Authority may wish to test.	**ES Vol 1 Chapter 14 [APP-053]** specifically considers the economic effects of the development on local agricultural activity including the loss or displacement of agricultural jobs because of the Scheme.
SEPE-D2-10	9. Consultation: defensive rather than reflective The Applicant asserts consultation was adequate, highlights number of events and attendees and rejects claims of bias or predetermination. There is no acknowledgement of power imbalance, accessibility barriers or technical complexity. Key deficiency: no evidence that consultation changed outcomes materially or influenced key design decisions beyond minor adjustments. This suggests consultation was procedural compliance, not substantive engagement.	The Applicant does not accept the points raised regarding their consultation process or that it was only carried out to ensure 'procedural compliance'. Firstly, the Applicant has explicitly adopted a two-stage approach to their consultation on the Scheme, with the first stage being the informal, non-statutory consultation carried out during October and November 2023, followed by statutory consultation which was carried out in September to October 2024. Running an early, non-statutory consultation phase is not required by sections 42 to 49 of the Planning Act 2008. The responses received during that process have helped shape both changes to the scheme and the overall assessment process. The process by which both the informal and statutory consultation was carried out by the Applicant has included a breadth of consultation measures including in-person open public consultation events, one-to-one meetings, and published project information across a range of media types. It has included structured, ongoing engagement with the host authorities through a Planning Performance Agreement (PPA), with regular officer meetings. These meetings included discussion with the authorities on the scope and content of the consultation exercise, identification of hard-to-reach groups and the approach to consultation, which were factored into the overall consultation process.

Our Ref.	SEPE Comments	Applicant Response
		Importantly, the consultation process is demonstrably linked to changes to the Scheme design. The **Design Approach Document [APP-034],** the ES and the Appendices to the **Consultation Report [APP-023 – APP-030]** all set out how consultation has influenced the design including multiple layout refinements, this includes but is certainly not limited to: • set-backs from properties in Site B • changes to access alignment to increase offset to Lodge Farm and reduce conflict with a public footpath, • revisions to the extent of solar panels around The Kangaroo, • further set-backs in Site C including additional space for woodland belt mitigation. • Changes to the buffers around PROWs The Applicant has also specifically sought to use the consultation process as a means of seeking preferences rather than just collecting comments. For example, during statutory consultation, the BESS/substation location was not fixed and feedback on the final location was specifically sought via the consultation questionnaire. The Applicant listened to the feedback which set a clear preference for the preferred location. Taken together, this shows that the Applicant's consultation has been: • used to shape the scheme design, mitigation and assessment scope • has exceeded statutory requirements; and • in doing so has used multiple engagement routes to maximise inclusivity.
SEPE-D2-11	10. Over-reliance on the 'DCO framework will fix it'	Outline management plans are an accepted and well-established mechanism in DCO applications.

Our Ref.	SEPE Comments	Applicant Response
	The Applicant deploys a recurring argument that detail is not needed now and that issues will be resolved via DCO requirements, management plans and future approvals. This is a core structural weakness, shifting critical assessments from consent stage to discharge stage. Key deficiency: undermines transparency, ability for stakeholders to challenge impact and the robustness of EIA conclusions.	The Applicant accepts the use of management plans approach is by no means a licence to leave important matters unresolved and they have prepared their outline management plans with sufficient detail to allow due consideration of the mitigation and control measures relied upon in the Environmental Statement. The final management plans will be prepared in accordance with the DCO requirements, and it will be necessary for them to be substantially in accordance with the details set out in the outline documents. The final management plans will need to be scrutinised by the relevant local planning authority and any other relevant consultees, before being deemed acceptable.
SEPE-D2-12	11. Limited evidence of independent verification Across a number of topics, the Applicant's responses rely on reiteration of conclusions already presented in the application documentation, but provide limited evidence of independent verification or testing of contested assumptions. Where representations raised technical concerns regarding assumptions, modelling inputs or omitted scenarios, the responses generally restate existing conclusions rather than demonstrate that those matters have been independently examined.	The process of preparing DCO applications inherently includes 'Independent Verification' at every stage of the process. This includes: • EIA Scoping – independent verification regarding the scope of the Applicant's Environmental Impact Assessment • Statutory Consultation - Independent verification from various statutory and non-statutory bodies on the Applicant's proposals, including their Preliminary Environmental Information Report (PEIR) • Examination – an independent "audit" of every technical documents, that tests whether the application, its assessments, mitigation and draft DCO are robust enough to justify the grant of development consent, including independent review of the submission by multiple consultees including Local Planning Authorities and their technical specialists, National Highways, the Environment Agency, Natural England, Historic England • Secretary of State Decision – further independent review of the Planning Inspectorate's recommendations It is simply not accepted by the Applicant that there is little evidence of independent verification of their submission. It lies at the heart of the process of preparing and determining an application for development consent.

Our Ref.	SEPE Comments	Applicant Response
SEPE-D2-13	12. Logical and evidential gaps 1. Alternatives assessment – dismisses alternatives (eg rooftop, brownfield) without comparative analysis. 2. Carbon efficiency – states no need to prove 'best' option and avoids demonstrating optimal land use. 3. Cumulative impact – addressed superficially and with no meaningful regional context.	The Applicant has already prepared a detailed response to these matters in Table 3 (Applicant Response to 'Procedural Deficiencies' identified by SEPE) in their **Response to Stop East Park Energy [REP2-045].**
SEPE-D2-14	13. Thematic coding, transparency and regard to responses The Applicant's Thematic Responses document appears to rely on a coding methodology under which Relevant Representations are grouped across broad themes, with individual representations capable of being coded repeatedly under multiple topics. This approach may obscure, rather than transparently reveal, the distribution and weight of underlying support, objection and unresolved concern. The issue is not whether supportive representations exist, but whether the coding methodology enables the Examining Authority clearly to understand the extent, substance and significance of unresolved objections, and whether those objections have materially influenced project evolution. In particular: • the thematic coding framework aggregates representations in a way that may dilute issue-specific concerns through abstraction into broad categories,	The Applicant has already responded on the matter of thematic coding in their response to SEPE-D2-02 above.

Our Ref.	SEPE Comments	Applicant Response
	without clearly distinguishing unresolved objection on principal topics; • repeated coding of individual Relevant Representations across multiple themes may create an impression of breadth of engagement, but does not in itself demonstrate substantive regard to the issues raised; • the Applicant's material does not transparently demonstrate how unresolved objections have been weighed in the planning balance, nor how the Examining Authority can distinguish between responses merely categorised and responses substantively addressed. Accordingly, there is a material question as to whether the Applicant has demonstrated adequate regard to consultation responses and Relevant Representations in a transparent and auditable form. SEPE respectfully requests that the Examining Authority consider whether the Applicant should provide: 1. a schedule identifying unique Relevant Representations (without duplication through repeated coding), distinguishing support, objection and unresolved concern; 2. a response matrix showing how principal categories of objection influenced (or did not influence) project design, mitigation or alternatives assessment; 3. clarification of how unresolved objections have been weighed in the planning balance, separate from their thematic categorisation.	

Our Ref.	SEPE Comments	Applicant Response
Comments on National Highways Statement of Common Ground, the updated Outline Construction Traffic Management Plan, and the Applicant's Technical Note on impact on the B645 / A1 St Neots junction [REP2-100]		
SEPE-D2-15	2. U-turning construction traffic has not been adequately assessed The routing strategy described in the updated oCTMP, including the prescribed approach to the Site via the B645 from the A1 at Eaton Socon, appears likely to give rise to U-turning HGV movements at Little Paxton junction and/or Buckden Roundabout in order to facilitate the left-in / left-out arrangement at the A1/B645 junction. Those U-turn movements appear to be a potential consequence of the proposed routing strategy, yet their safety and capacity implications do not appear to have been explicitly assessed. The point made is not that such effects necessarily arise, but that the basis on which they have been considered is not presently clear. This may be particularly relevant in relation to Little Paxton junction, where the southbound merge arrangement includes a give-way controlled movement onto the A1, which may raise additional questions regarding the operation of HGV joining movements and associated safety implications if U-turning construction traffic were to use that route. In addition, if U-turning construction traffic were to utilise Little Paxton junction, this may give rise to a question whether effects on nearby residential receptors have been sufficiently considered. Such movements could introduce	The Applicant would note that discussions are ongoing with National Highways and Cambridgeshire County Council in regard to this matter with to both the need for the imposed routing restriction and the identification of appropriate locations for vehicles to turn. However, the Applicant would also note that the number of daily HGV movements would be relatively low. There would be a maximum of 30 HGV movements per day in each direction along the A1 during the construction phase. This volume of HGV traffic would only occur for a 3-month period. It is not considered that this level of traffic would result in material impacts on receptors along the A1 with regard to either environmental effects or junction capacity, as per the high-level appraisal of the impact on the A1 set out in paragraphs 9.8.29 to 9.8.31 of **ES Vol 1 Chapter 9 Traffic and Transport [REP2-010]**.

Our Ref.	SEPE Comments	Applicant Response
	HGV traffic in close proximity to residential properties potentially not understood to fall within the scope of assessed project traffic impacts during statutory consultation, given that this potential consequence does not appear to have been explicitly identified. This may warrant further consideration. A related question may arise as to whether potentially affected receptors at Little Paxton and Buckden have been sufficiently considered in light of the information presented during consultation. Neither the statutory nor non-statutory consultation materials appear to have identified Little Paxton junction or Buckden Roundabout as locations potentially affected by project-related traffic, nor did the consultation masterplan mapping appear to show those locations within the apparent scope of traffic effects presented to the public. In that context, there is a question whether residents in proximity to those junctions could reasonably have understood themselves to be potential receptors of project traffic impacts. To the extent that these implications arise from later-emerging routing assumptions, this may warrant consideration as to whether those implications have been sufficiently communicated and considered. A further issue for consideration may arise in relation to the A1/A428 Wyboston junction. While Wyboston is not identified here as a primary U-turn location for the Proposed Development, it may be a reasonably foreseeable routing scenario that some construction traffic travelling southbound on the A1, which cannot utilise the southbound A1/B645 junction, could instead use the A1/A428 Wyboston junction, which appears to offer a shorter route (by approximately five miles). If so, this may	

Our Ref.	SEPE Comments	Applicant Response
	warrant consideration as part of any assessment of whether displaced or reassigned HGV movements could give rise to wider junction effects. This may be of potential relevance given concerns raised by Cambridgeshire County Council in the A428 Black Cat to Caxton Gibbet Examination regarding traffic queuing on the Great North Road southbound approach to the Wyboston junction, including potential effects extending towards Nelson Road roundabout. While the National Highways SoCG does not expressly identify Little Paxton or Buckden U-turn impacts as a matter in dispute, SoCG Ref 8 ("The conclusions in respect of the assessment of traffic and transport impacts and effects") remains under discussion. In that context, the question of whether these consequences require explicit assessment remains legitimately open.	
SEPE-D2-16	Relevant precedent from A428 Black Cat to Caxton Gibbet A relevant point of reference is the A428 Black Cat to Caxton Gibbet DCO Examination, where Cambridgeshire County Council raised concerns regarding U turn-related safety and capacity effects at major junctions, including Buckden Roundabout, and sought detailed modelling, including: • VISSIM assessment at Buckden; and • ARCADY assessment at Wyboston Roundabout. Wyboston is referenced here primarily as precedent, although the possibility of reasonably foreseeable displaced or reassigned movements via that junction may	The Applicant acknowledges this comment but would note that National Highways has not raised any concerns regarding the methodology used in the modelling assessment. National Highways only requested an appraisal of the impact during the construction phase. The level of uncertainty regarding the level of background traffic and future developments 20 or 40 years into the future is such that it would not be possible to draw any meaningful conclusions from modelling the impacts of replacement and decommissioning activities. However, it should be noted that the level of development traffic associated with replacement activities would be significantly lower than the forecast volume of construction traffic, and the traffic generation during the decommissioning phase would be no greater than during the construction phase. The relative impacts of development traffic during the operational and decommissioning phases would therefore be lower than the impact of

Our Ref.	SEPE Comments	Applicant Response
	also warrant consideration. In any event, it provides evidence that the highway authority has previously regarded U-turn-related impacts and associated junction effects as a matter requiring explicit assessment. Cambridgeshire County Council's Wyboston and Barford Road Roundabouts Mitigation Note concluded those roundabouts would be over capacity in 2040 with the A428 scheme. That precedent supports the need for comparable scrutiny of U-turn movements generated by the EPE routing strategy, and may also be relevant to consideration of whether any displaced or reassigned movements could have wider junction implications. Request National Highways, Cambridgeshire County Council and the Examining Authority are respectfully invited to consider whether further assessment should be required of the safety and capacity implications of U-turning HGV construction traffic at Little Paxton junction and/or Buckden Roundabout, whether any question arises as to potential implications for nearby residential receptors and potentially affected receptors not previously identified in consultation materials warrants consideration, and whether any reasonably foreseeable displaced or reassigned HGV movements via the A1/A428 Wyboston junction also warrant consideration, having regard to the approach previously taken by Cambridgeshire County Council in relation to comparable U-turn-related issues in the A428 Black Cat to Caxton Gibbet Examination.	construction phase traffic, when set against a likely increase in background traffic flows.

Our Ref.	SEPE Comments	Applicant Response
SEPE-D2-17	3. Concerns regarding the A1/B645 junction Technical Note Single-day survey methodology Paragraph 2.2.3 relies on one day of turning count and queue surveys (11 March 2026). That appears limited for a junction-specific appraisal of this significance. A more robust approach would ordinarily include: • multi-day or 7-day Automatic Traffic Counts to validate representativeness; • confirmation no atypical conditions affected the survey day; • sensitivity testing for peak-period variability. Modelling tool The Applicant uses PICADY (Junctions 10) for the A1 northbound slip/B645 junction. While PICADY may be suitable for isolated priority junctions, there is a legitimate question whether it is the most appropriate tool for a junction operating as part of an interacting three-junction arrangement involving: • slip roads • a mini roundabout • mainline safety considerations. Given precedent elsewhere, the need for more sophisticated modelling should be considered. For example, National Highways was required to produce	The Applicant acknowledges this comment but would note that while obtaining ATC data to verify the turning count data may be National Highways' standard practice when commissioning large-scale network models to appraise the impacts of highway improvement schemes, it is not standard practice for modelling capacity and queue lengths at individual junctions. For the purpose of the assessment undertaken, obtaining 12-hour turning and queue length data for a typical weekday is considered to be an appropriate methodology. National Highways has reviewed the assessment and has not raised any concerns regarding the baseline data used in the assessment. Nevertheless, the manual traffic count data has been compared to the baseline ATC data obtained in 2022 for ES Vol 1 Chapter 9: Traffic and Transport (as updated alongside this submission). This indicated average two-way weekday flows between 07:00 and 19:00 of approximately 6,930 vehicles and 3,980 vehicles, respectively, along the B645 and A1 northbound exit/entry slip roads in 2022, compared to approximately 7,060 and 4,000 vehicles on the same roads as observed in the 2026 turning counts. The turning count data is therefore considered to provide a reasonable representation of historic traffic flows through the modelled junctions. National Highways only requested an appraisal of the impact during the construction phase. The level of uncertainty regarding the level of background traffic and future developments 20 or 40 years into the future is such that it would not be possible to draw any meaningful conclusions from modelling the impacts of replacement and decommissioning activities. However, it should be noted that the level of development traffic associated with replacement activities would be significantly lower than the forecast volume of construction traffic, and the traffic generation during the decommissioning phase would be no greater than during the construction phase. The relative impacts of development traffic during the operational and decommissioning phases would therefore be lower than the impact of

Our Ref.	SEPE Comments	Applicant Response
	VISSIM modelling for Buckden Roundabout in the A428 Black Cat to Caxton Gibbet Examination, illustrating that more detailed modelling has previously been considered necessary where interacting junction effects and turning movements raise concern. That precedent may be relevant in considering whether the present appraisal is sufficiently robust. Lifecycle assessment gap The Technical Note addresses construction phase impacts, but does not appear to assess: • operational replacement traffic; • component replacement traffic (including mid-life replacement, where relevant); • decommissioning traffic; • future-year growth effects at those later stages. This warrants further explanation.	construction phase traffic, when set against a likely increase in background traffic flows.
SEPE-D2-18	4. Construction routing and access strategy concerns (a) Permitted routes / restricted routes The application still does not appear to provide a clear Construction Traffic Permitted Routes / Restricted Routes Plan for the wider affected area. This has been requested by local highway authorities and appears consistent with practice adopted on comparable NSIP schemes.	The Applicant would note that the routes to be used by construction traffic, including the proposed sections of public highway that would be utilised, are illustrated on the Proposed Construction Access Strategy plan in Appendix C of the **outline Construction Traffic Management Plan (oCTMP) [REP1-034]**. The routes illustrated on this plan constitute the permitted routes. All routes not shown on this plan would be classified as restricted routes, and any vehicles found to be using any restricted routes would constitute a breach of the oCTMP.

Our Ref.	SEPE Comments	Applicant Response
	A detailed plan should be prepared, agreed with the highway authorities, and consideration given to securing it through the DCO. More broadly, these issues emphasise that the oCTMP does not yet appear to provide a sufficiently explicit and comprehensive statement of which existing roads may be used by construction traffic, nor a clear permitted routes / restricted routes framework of the kind sought by the Local Highway Authorities and several Interested Parties. In that context, a Construction Traffic Permitted Routes / Restricted Routes Plan should be prepared for the wider affected area, including the area bounded by the A1, the A14, Bedford to the south, and the B660 / Swineshead Road to the west, and consideration given to securing it through the DCO.	
SEPE-D2-19	(b) Public highway use between SA10 and SA12 Paragraph 5.1.13 proposes HGV movements between SA10 and SA12 using sections of Great Staughton Road and Spring Hill Road, supported by minor road widening. However, Appendix C appears to show a temporary internal haul road along the cabling corridor between Sites B and C. While some northern parts of Site B may require access from Great Staughton Road, it is unclear why HGV movements between SA10 and SA12 would rely on the public highway where an internal haul route appears available for those movements, absent explanation as to why that alternative would not be reasonably practicable.	The Applicant notes this comment but has had to balance practical, safety, land ownership and environmental considerations in developing the construction access strategy. This has included the need to avoid unsuitable routes and settlements where practicable, provide safe and deliverable access to each part of the site, limit unnecessary temporary land take that cannot be justified for compulsory acquisition, and avoid other environmental impacts.

Our Ref.	SEPE Comments	Applicant Response
	Relatedly, the basis on which proposed internal haul routes would accommodate the range and frequency of intended HGV construction movements is not clearly explained and may warrant further clarification.	
SEPE-D2-20	(c) Minimal forecast traffic at SA03–SA06 and SA09 The Applicant's traffic-flow diagrams appear to assign very low movements to: • SA03 • SA04 • SA06 • SA09 despite these accesses serving substantial areas of development and satellite compounds, including parcels proposed for solar panel installation and associated construction activity. In particular, the movement assumptions appear low when considered against the apparent scale of land served, including approximately 4 hectares at SA03, 6.25 hectares at SA04, 20 hectares at SA06 and approximately 60 hectares associated with SA09 together with the access requirements associated with the satellite compound near Green End. While the application includes traffic-flow diagrams, indicative access drawings and references to internal haul routes, it does not clearly explain how these areas can be constructed with such limited forecast movements, nor	The Applicant would note that the volume of traffic forecast to require access to accesses SA03, SA04, SA05, SA06 and SA09 was calculated based on the proportion of site area served by each of these accesses relative to the total area of Site B. **ES Vol 2 Appendix 9-1 Transport Assessment [as updated alongside this submission]** has been updated to provide further clarification on this point. The Applicant would also note that the parcels of land served by access SA03, SA04, SA05 and SA06 comprise only 12% of the total area of Site B, and the parcels served by access SA09 comprise 13% of the total area of Site B. A detailed breakdown of construction traffic by site access and activity type would be included within the final CTMP once the detailed construction programme has been prepared by the appointed contractor. The Site access junctions have been designed to accommodate the largest vehicle type that would be required to use each access. The visibility splays at each access have been designed in accordance with the standards set out in the Design Manual for Roads and Bridges. A detailed breakdown of construction traffic by site access and activity type would be included within the final CTMP once the detailed construction programme has been prepared by the appointed contractor.

Our Ref.	SEPE Comments	Applicant Response
	does it transparently disaggregate the assumptions underpinning those forecasts, including: • delivery assumptions for panels, mounting structures, cabling and associated materials; • staff access assumptions; • plant and equipment movements; • the extent to which internal haul routes are assumed to substitute for public highway movements; • whether access-specific movements include all construction phases, including compound establishment and temporary works; and • whether forecast movements reflect peak construction activity or only average assumptions. It is unclear whether the forecasts fully account for the practical implications of access geometry, potential road widening, visibility constraints or the relationship between individual access points and the proposed internal haul strategy. This creates uncertainty as to whether localised construction activity may be understated, or at least whether the basis for the very low movement assumptions has been sufficiently explained to enable proper scrutiny.	
SEPE-D2-21	5. Site access design and visibility splays The changes to visibility splays and access geometry raise continuing concerns, particularly where: • full DMRB-compliant splays cannot be achieved;	The site access arrangement drawings included within Appendix D of the **oCTMP [as updated alongside this submission]** have been updated to illustrate the extent of hedgerow that would be impacted by the Site access points. The use of Manual for Streets visibility splays is only proposed at accesses SA14, SA15, SA17, SA18 and SA19 on the basis that it is not possible to

Our Ref.	SEPE Comments	Applicant Response
	• temporary speed reductions are relied upon to reduce visibility requirements; • some Appendix D plans appear still to show visibility splays derived using Manual for Streets criteria. These matters have already been identified in BBC's LIR. Further: • designs appear based on OS MasterMap, rather than detailed topographical survey; • this may understate, or may not fully capture, road widening, hedgerow removal and associated environmental effects. Worst-case assumptions, including the extent of visibility-related works and associated hedgerow effects, should be tested. Relatedly, it is not clear whether the assessment fully addresses traffic management arrangements or diversion implications associated with constructing access works and localised road widening itself.	achieve full DMRB visibility splays at these locations. These accesses would only be used during the construction phase, and it is proposed that vehicle movements at these accesses would be controlled through the implementation of temporary speed limits on Moor Road, Duloe Lane and Bushmead Road, alongside temporary traffic management, as shown in the **Traffic Regulation Measures Plan [REP1-004]** and the indicative access arrangement plans included in Appendix D of the **oCTMP [as updated alongside this submission]**. The detail of the layout of traffic management to be implemented to facilitate construction works will be submitted to the relevant local highway authorities for approval at the detailed design stage, as secured by Requirement 3 of the **draft DCO [REP1-005]**.
SEPE-D2-22	6. Highway condition, enforcement and monitoring The proposed Highway Condition Survey should apply not only before and after construction, but also before and after: • operational replacement works • decommissioning works. Consideration should be given to securing these requirements through the DCO. This may be particularly relevant in light of existing freight restrictions on parts of	The Applicant notes this comment. As stipulated in paragraph 2.4.10 of the **outline Operational Environmental Management Plan [REP1-036]**, details of measures to manage the impact of traffic generated by large-scale replacement activities (defined as the replacement of more than 20% of solar panels within any 12-month period) will need to be submitted to the local highway authorities for approval prior to undertaking those replacement activities. These measures should be consistent with the principles of the approved CEMP, PRoWMP, CTMP and OEMP. This would include for undertaking highway condition surveys.

Our Ref.	SEPE Comments	Applicant Response
	the local road network west of the A1, including areas subject to 18-tonne restrictions, which reinforce the need for clarity as to route suitability and road condition effects. Similarly, proposed enforcement mechanisms, including: • delivery slot control • ANPR or geofencing • route compliance monitoring are currently described in principle, but not clearly secured. The practical resourcing of monitoring and enforcement may also warrant clarification, noting requests by local highway authorities in relation to monitoring arrangements. It is also unclear how delivery slot allocation and associated route compliance measures would be monitored, managed and enforced in practice, if relied upon in the assessment. If relied upon in the assessment, consideration should be given to securing them as enforceable requirements, rather than leaving them as optional future measures.	Paragraph 2.5.2 of the **outline Decommissioning Environmental Management Plan [REP2-030]** also requires that a specific Decommissioning Traffic Management Plan must be submitted to and approved by the local highway authorities prior to any decommissioning activities taking place. The measures that would be included within the DTMP would be consistent with the principles of the approved CTMP. The requirement to implement an approved detailed CTMP, which must be in substantial accordance with the measures set out in the oCTMP, is secured under Requirement 8 of the **draft DCO [REP1-005]**.
SEPE-D2-23	7. Construction worker traffic assumptions The Outline Construction Workers Travel Plan (oCWTP) (Appendix to the Outline Construction Traffic Management Plan, Deadline 1 update) assumes an average car occupancy target of two workers per vehicle. National Highways has expressed concern regarding the large number of construction workers expected to drive to the site and has requested additional explanation	The Applicant would note that an appraisal of the environmental impacts of construction traffic resulting from a car occupancy of 1.4 was presented in the **Technical Note on Impact on B645-A1 St Neots Junction [REP1-066]**. This identified that there would be no significant effects in EIA terms resulting from the increase in traffic resulting from the change in assumed average staff car occupancy level. The Applicant would also note that the restriction suggested by CCC in relation to the use of the southbound slip roads at the A1 / B645 junction only applies to construction HGV movements. Construction staff trips would not

Our Ref.	SEPE Comments	Applicant Response
	concerning impacts at the A1/B645 junction, including whether further modelling is required. In that context, there is a legitimate question whether sensitivity testing should be undertaken to examine the implications if the assumed average car occupancy of two workers per vehicle is not achieved in practice. This may be particularly relevant given National Highways' Relevant Representation (Section 4.3.4) raised concern that an average occupancy assumption of two workers per vehicle may be high compared with assumptions used on other comparable schemes, and indicated that lower occupancy assumptions (for example 1.4 persons per vehicle) could materially increase worker vehicle movements accessing the site and may have consequential implications for traffic effects on the A1 corridor, including any U-turn movements associated with the proposed routing strategy. That consideration may warrant explicit sensitivity testing.	be restricted to using only the northbound slip roads at this junction, and so would not need to turn round at any point along the A1.
SEPE-D2-24	8. Conclusions and requests The Applicant has responded to some concerns, but material issues remain unresolved. In particular, National Highways and the Examining Authority are respectfully requested to consider requiring: 1. Assessment of U-turning HGV impacts at Little Paxton and/or Buckden, including whether potential implications for nearby residential receptors at Little Paxton and any reasonably foreseeable displaced or reassigned HGV movements via the A1/A428 Wyboston junction also warrant consideration, or, at minimum, consideration of	The Applicant has responded to these points with reference to SEPE-D2-15 to SEPE-D2-23 above.

Our Ref.	SEPE Comments	Applicant Response
	whether further assessment of those matters should be required, having regard to previous highway authority concern regarding comparable U-turn-related and queuing issues in the A428 Black Cat to Caxton Gibbet Examination. 2. Review of whether the A1/B645 Technical Note uses sufficiently robust survey and modelling methods. 3. A detailed permitted / restricted construction routes plan. 4. Reconsideration of the justification for public highway use between SA10 and SA12, including whether internal haul routing should be preferred. 5. Clarification of the very low movement assumptions at SA03–SA06 and SA09. 6. Further scrutiny of visibility splays, access design assumptions and associated hedgerow impacts. 7. Consideration of securing through the DCO requirements for monitoring, enforcement and highway condition surveys across all project lifecycle phases. 8. Sensitivity testing of worker traffic assumptions using lower average vehicle occupancy rates.	
SEPE-D2-25	Earlier project documentation, including the 2023 non-statutory consultation material, indicates that two access points were originally proposed for Site D from the B645 (Access One and Access Two). Access One appears materially closer to the A1/B645 junction. Access Two is located in the vicinity of the principal construction traffic	At the point the Applicant was carrying out non-statutory consultation the Applicant had devised a construction access strategy which was designed to alleviate construction vehicle movements through settlements and minimise the use of the public highway in surrounding the Site. Details of the main points of access associated with that strategy are shown on the illustrative plans that accompanied the Applicant's informal consultation exercise **[APP-023 - APP-030].**

Our Ref.	SEPE Comments	Applicant Response
	access point now proposed within the submitted application. The access strategy presented in the submitted application requires construction traffic to navigate a constrained section of the B645, including Pigg's Hill, which may introduce additional highway safety considerations. The final principal construction traffic access point appears to represent a departure from earlier proposals, raising questions as to whether highway safety considerations have been adequately assessed and prioritised in determining the final proposed access arrangements. A related question arises as to whether the earlier "Access One" option may have represented a potentially safer or less constrained route for construction traffic, and if so whether the reasons for its evolution or omission have been sufficiently explained. This observation is not advanced as a freestanding objection to the current access proposal, but as a contextual point relevant to whether reasonable alternatives and associated highway safety implications have been adequately scrutinised.	The main construction access strategy was based around the use of a temporary haul route which was to follow the cable corridors between each of the principal development areas (Sites A - D). The main connections to the planned haul route were proposed via an existing access off the B645 approximately 0.7km to the south of Hail Weston (next to Sharps Barn), which had been used in connection with the construction of another solar farm development. This access intersects with the main cable route corridor, which would have then been used to lead construction traffic to the main construction compound in Site D. A secondary access to Site D was also proposed via an existing gated farm track which connected to the B645 at Wood View to the north of Hail Weston. At the time the Applicant was also considering a further construction access to Site C via Moor Road. From Site D construction vehicles would then follow the haul route / cable route corridors between each Site area, limiting construction vehicle movements through settlements and on the public highway network. For the operational phase, it was proposed that the main site access would be off Moor Road into Site C, providing a direct connection to the BESS and on-site substation. Following the Applicant's informal consultation exercise, they continued to develop the Scheme to consider the outcome of environmental assessment work and other ongoing technical and commercial assessments. A combination of commercial and environmental issues necessitated revisions to the Applicant's access strategy. They included: • The discovery of the Roman Town Scheduled Monument within Site C, which led to the re-location the BESS and main operational site access from Site C to Site D • The Applicant's inability to reach commercial terms for the use of the Sharps Barn access. Following the discovery of the Roman Town, the Applicant considered the benefits of retaining the BESS and operational buildings in Site C or re-

Our Ref.	SEPE Comments	Applicant Response
		locating them elsewhere in the Scheme. The most technically and environmentally preferable option for their relocation was in Site D. The positioning of the BESS, was the subject of an optioneering exercise during the Applicant's statutory consultation exercise, where the responses were in favour of relocating the Scheme infrastructure in Site D, rather than its original location in Site C. Given that Site D will also host the main construction compound, the Applicant elected to change the location of the main construction access, to a new location off the B645, to the immediate north of Site D. This is referred to as Site Access 'SA16' in Appendix C (Proposed Construction Access Strategy) of the **oCTMP [REP1-0034].** The decision to create a new main construction access was also influenced by the Applicant's inability to agree acceptable commercial terms on the use of the Sharps Barn access. The rationale behind the change was that the access could be used to service the main construction compound for the duration of the construction phase and could then be retained to provide operational / emergency access to the BESS and East Park Substation during the operational phase. From a highway safety perspective, the current site access SA16, meets all necessary highway safety / visibility standards set out in the Design Manual for Roads and Bridges (DMRB). Additionally, no highways safety concerns would result from the movement of construction vehicles on the B645 which allows two-way movement of construction vehicles. The conclusions have also been verified by Cambridgeshire Highways (the local highway authority) in their response to the examination. Where a proposed site access (in the case SA16) is proven to be safe, suitable and compliant with all relevant highway standards, including visibility requirements, there is no policy basis to require the Applicant to undertake a review of alternatives. The relevant planning test is whether the submitted access is acceptable in highway safety and operational terms, not whether another access arrangement may be preferable. In the absence of any deficiency regarding the access or its highway impact, the assessment of

Our Ref.	SEPE Comments	Applicant Response
		alternatives would be disproportionate and beyond what is necessary to make the Scheme acceptable in planning terms. In drawing this conclusion, it is also worth reiterating that the Sharps Barn access (shown on the informal consultation material) is no longer a viable option for the Applicant and, consequently, does not represent a realistic comparator with SA16.
SEPE-D2-26	Traffic management and enforcement concerns There are significant concerns regarding the practical ability of East Park Energy (EPE) to manage and enforce designated traffic routes. The haulage sector has seen an increasing reliance on internationally sourced drivers, often operating at lower cost and heavily dependent on satellite navigation systems. Such systems do not necessarily align with prescribed routing strategies. This creates a material risk that drivers will not adhere to designated routes, thereby undermining the effectiveness of any proposed traffic management plan. As a result, there is limited confidence that EPE will be able to exercise meaningful control over vehicle movements in practice.	The Applicant considers this to be conjecture; any contractors found to be in repeated breach of the approved construction traffic routing arrangements would be removed from the Scheme, as per the enforcement measures set out in Section 9.3 of the **oCTMP [REP2-034]**.
SEPE-D2-27	Unsuitability of rural and makeshift roads It is highly unlikely that haulage operators will utilise makeshift or cross-country routes across the site when operating high-value HGVs (typically in the region of £100,000). The use of such routes presents a significant risk of vehicle damage and operational inefficiency. In addition,	Any contractors found to be in repeated breach of the approved construction traffic routing arrangements would be removed from the Scheme, as per the enforcement measures set out in Section 9.3 of the **oCTMP [REP2-034]**.

Our Ref.	SEPE Comments	Applicant Response
	repeated use would likely result in substantial and lasting damage to the road surface and surrounding land. In practice, drivers can reasonably be expected to default to established highway routes, irrespective of any proposed restrictions or guidance.	
SEPE-D2-28	Impact of lifting weight restrictions The temporary removal of weight restrictions across the local rural road network has the potential to significantly increase wider HGV traffic volumes, potentially increasing heavy vehicle movements on the local road network. There is limited confidence that such changes would be effectively monitored or enforced by the relevant highway authorities. This creates a risk of: • Increased heavy traffic on roads that are not designed or suitable for such use • Structural damage to older properties located along affected routes • Additional and unmanaged traffic flows through settlements including Kimbolton, Ellington and surrounding areas	The Applicant would note that it is not proposed to temporarily remove any weight restrictions. This proposed measure was removed from the proposed schedule of traffic management, as per the **Traffic Regulation Measures Plan [REP1-004]**.
SEPE-D2-29	Limitations of enforcement measures The proposed use of Automatic Number Plate Recognition (ANPR) cameras presents a number of practical and operational limitations: • EPE does not possess enforcement authority over third-party haulage operators • Effective enforcement would require continuous (24/7) monitoring, which is not realistic	The Applicant would note that the wording of the oCTMP does not specify that ANPR monitoring would be used. It instead provides a commitment to implementing the most suitable type of monitoring system (ANPR or GPS-based geofencing), and that the specific monitoring system that will be implemented will be set out within the final CTMP depending on which system is found to be the most suitable for use at this Site.

Our Ref.	SEPE Comments	Applicant Response
	• Effective enforcement may depend in part on third-party regulatory or highway authority involvement beyond the Applicant's direct control • The cost of installation and operation across multiple routes would be substantial and potentially disproportionate Taken together, these factors indicate that effective enforcement of routing controls may be difficult to achieve in practice.	It is to be expected that third-party contractors would be required to adhere to and abide by the implemented monitoring system and the measures set out within the CTMP as a condition of the terms of appointment agreed with each contractor.
SEPE-D2-30	Operational constraints for hauliers Haulage operations typically involve multiple loads per day, with start times often significantly earlier than those indicated within the application. For example, at the Cobholden Solar scheme, delivery vehicles have been observed queuing from approximately 6:30am. This suggests that the operational assumptions presented within the application may not accurately reflect real-world haulage practices.	The Applicant is not in a position to comment on the logistics and delivery management plan which was agreed and implemented at the Cobholden Solar scheme, or the mechanisms for enforcement on that project.
SEPE-D2-31	Peak-time traffic implications The assumption that all staff will arrive at 8:00am concentrates workforce movements within an already congested peak travel period. This is likely to exacerbate existing traffic pressures rather than mitigate them, contrary to the stated objectives of the traffic management strategy.	The Applicant would note that the assessment has been undertaken for the worst-case scenario, which assumes that all staff would arrive at the Site prior to the start of construction hours each day, and all depart following the end of construction hours. The assessment has demonstrated that there would be no significant detrimental impact on the operation of the highway network in this scenario.

Our Ref.	SEPE Comments	Applicant Response
SEPE-D2-32	Safety risks at A1 junctions The requirement for all HGVs to travel northbound before heading south appears to displace traffic impacts rather than resolve them. This approach is likely to increase pressure on Little Paxton, which already experiences HGV traffic associated with Hanson Quarry operations. Right-turn movements at the A1 junction are of particular concern. Increased traffic volumes at this location may materially elevate the risk of collisions, creating a location of potential heightened safety sensitivity. Furthermore, it is unlikely that drivers will continue north to Buckden due to: • Speed restrictions along this section of the A1 • The operational difficulty of navigating the Buckden roundabout	The Applicant has responded to these points with reference to SEPE-D2-15 above.
SEPE-D2-33	Inaccuracies in documentation An error has been identified in the application documentation relating to road naming. The route described as “Spring Hill Road” (between Pertenhall Road and Little Staughton) is, in fact, unnamed. This raises questions regarding aspects of the accuracy and reliability of the submitted information.	The Applicant notes this comment but would note that the road name “Spring Hill” or “Spring Hill Road” has been used interchangeably by numerous parties in submitted responses to refer to this section of road, including the local highway authorities. The naming convention has been used for ease of reference.