

i would like to add the following attachments which cover my statement that there was not time for me to read at the hearing. i did ask questions. i addition i have tabulated comments regarding the following management plan changes; rights of way, landscape and ecology. in addition criticism of the outline public rights of way document. finally, i feel that the inspector should have visited the site after listening to what people had to say to ensure he took into account the devastating impact on grows inthe surrounding area that are on higher ground. these were all omitted.

**My Name is Elaine Wheeler and I have many concerns regarding the PRowS within this NSIP application.**

**I feel that I have a right to comment and to question the damage that will be done to this area. I was a PC for Pertenhall and Swineshead and as such had a responsibility for PRowS, working with the BC.**

**Safety of PRow users:**

**This area is, as has been recorded, traversed by 23 FP and 5B all of which link with a much wider network of PRowS, including the Three Shires Way. The construction phase (if it is given the green light) will to all intents and purposes make this vast area non- navigable for about 3 years and no longer fit for purpose in the future.**

**In the outline Management Plan 2025 version 1, where conflict with the PRowS would occur it states that temporary diversions would be necessary. The May 2026 PO3 Outline PRow Management Plan now states that no diversions would be necessary and that 'other' measures would be put in place! There is however no obvious rationale for the danger from the dual use of the PRowS with industrial vehicles. Temporary diversions would solve this. How would signs for users and industrial vehicle drivers be an adequate safety measure, especially in times of intensive use. This should be given reconsideration by the applicant.**

**The proposal requires vehicular access to the site to be ongoing for maintenance and security . The plans in the Environmental Management plan – EN010141/DR/6.3 show that many of these access routes will be along the same routes as the PRowS. This proposal was in a position to at least offer a complete elimination of these shared routings and by doing so offer something back to PRow users. Again, there was an opportunity to consider the safety of PRow users. It may not be considered to be important or a safety issue to the applicant, but vehicles may be on the PRowS when users are there and the design within the narrow channels afforded by the fencing and hedgerows proposed would make users very vulnerable.**

**The surface required for a vehicle is not the surface preferred by PRow users and this has not been given any consideration by the applicants. The two are not compatible.**

**It is stated that during the operational phase that the monitoring of the condition of the PRowS would be quarterly and work to rectify anything found to be remiss would be recorded and made good when it was reasonably practicable – there is no mention of time lapse between an issue and rectification or passing the issue on.**

### **Loss of visual Amenity**

The proposal includes the inclusion of many kilometres of hedgerow and tree belts running alongside the PRowWs in order to screen the panels, acknowledging the fact that users would not wish to look at the surrounding vista these would give. A negative factor admitted by the applicant.

The area is well used by all with a passion for wide views and vistas all of which would be lost by this proposal, never to be replaced. This also is relevant to the PRowWs outside the red line of the site that look over the area. This shows how wide sweeping the damage to the broader area's landscape and the pleasure for walkers and other user groups would be.

### **Health and Well Being**

We are all very aware of the benefits of the countryside for our health and well being and the importance of getting out into the wide open spaces to enable us to benefit from the restorative impact.

This area is used by many walking groups from wider than the local areas, this includes many schools that bring their students here from our surrounding schools many of which can afford the short journeys that this location requires, but still providing all the benefits of our more well known recreational areas much further away. Students are also brought to the area for D of E expeditions, [these are considered to be invaluable to all students] and not just those who can travel distances.

To take this away from so many people is not considered to be a net gain to them or the country as a whole.

### **Permissive Paths**

7 permissive paths are shown on the plans, only one of which is for equestrians, they add minimal benefit to PRowW users as they are just links within existing networks and do not offer a new aspect to those that would be lost.

To Conclude;

The only way that the devastation that this proposal would bring to this area can be appreciated is by visiting the area, looking at the views afforded, listening to the birdsong and enjoying the feeling of calmness it brings. These would all be lost to everyone.



10<sup>th</sup> July submission – Elaine Wheeler

There are an enormous amount of documents and revised documents that have been produced for this proposal. Sadly the community of the area and those that use the area have been neglected and ignored by the applicant in this documentation. This has not been pursued or questioned by the Inspector.

The landscape of the area would be decimated and the views from PROW s external to the red line looking across the stunning Riseley Wolds have been ignored. No reference to this has been made in documentation or discussed at the hearings when referred to or in any follow up documentation.

The PROWs across the site are an intrinsic part of the external network including the link with the Three Shires Way. Again no consideration given.

The area is used for D of E bronze routes by many schools from a wide area. This would not be feasible during construction and would not give the students a favourable view of countryside and habitat on completion. It would be like giving them a taste of prison life! These are the people who will inherit the decisions made regarding this project not an enviable inheritance.

Two visits to the area have been made by the Inspector, the first prior to the examination and the second before the views of the community and statutory bodies and the local authorities had been heard. Pertenhall was not visited on either occasion and it is from locations here that the enormity of this proposal emerges, again no listening to those it would impact

It appears that Brockwell have requested to submit their drone and walk through video post the 10<sup>th</sup> July closing date, so it will be too late for anybody to see if areas that they propose to walk will be covered to negate the omission of Pertenhall and Grange Farm from the Inspectors visits. This again means that the community and statutory bodies will not get an opportunity to view and comment.

It is wrong that the Management Plans for the area under the various headings or detailed plans and drawings do not appear at this stage and in fact will not be written until permission is granted. Unless this means that this would only be an outline permission that would be void after the three year period as in other planning applications. If not, this would again show an enormous disparity between this application and any that maybe current in this area belonging to the community and residents that are affected by this solar farm application.

The intention not to pay for the PROWs to be diverted during the 3+ year construction period to ensure the safe separation of construction and vehicles from people and animals is an outrage and again shows no lack of consideration to the community that use these.

PROWs are covered by law and it is legally mandatory for any diversions or changes to them goes through a court procedure, what right is there to make them into routes being used by commercial vehicles without the correct channels being adhered to.

This is just a small amount of wrongs that are proposed to be imposed on this community and the surrounding area and no consideration has been given to the implications that this will mean for so many and to the landscape and the wildlife of this area. No amount of planting and sowing of grass and flowers will alter that.

## Landscape and Ecological Management Plan May 2026

### LEMP – Landscape and Ecology Management Plan

| Paragraph          | Previously                                                      | Changes                                                                                                                                                                        | Comments                                                                                                                                                                           |
|--------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction Phase |                                                                 | Added to the staff                                                                                                                                                             | They will need a staff to do the work or are they just recording.                                                                                                                  |
| 5.2.7.             | No mention of protection                                        | All vegetation will be protected apart from where specified for removal. Any subsequent work will protect hedgerows and tree roots as identified by specific arboriculturalist | How they will manage this during construction. Bushmead is an example of what actually happens! No areas shown specifically for this treatment.                                    |
| 5.2.12.            | Lighting to be placed on site.                                  | Lighting to be kept away from hedges, water courses and from all other ecological receptors.                                                                                   | No specific locations shown. Hedges are on the boundaries, presumably lighting is for security – how will this work?<br>How will lighting affect human residents and road traffic. |
| 5.3.35.            |                                                                 | Soil sampling will be provided & submitted for approval from LEMP                                                                                                              | What would this show?                                                                                                                                                              |
| 5.3.43.            | No footscape material mentioned.                                | Permanent footpaths will be consistent with existing surfaces and not be hard surfaced                                                                                         | Presumably vehicles would have their own route side by side not shared?                                                                                                            |
| 5.3.45 & 5.3.46.   | Anti social behaviour would lead to closure of permissive paths | Now been changed as in PRow chart                                                                                                                                              | Interesting that it was felt necessary to put PRow into this document.                                                                                                             |
| 6.4.15.            | Width of PRow not given                                         | 2m for footpaths<br>4m for bridleways                                                                                                                                          | Presumably the roads will be in addition.                                                                                                                                          |
| 6.4.16.            |                                                                 |                                                                                                                                                                                | Covered in PRow MP                                                                                                                                                                 |
| 6.5.2.             |                                                                 | Native tree planting will take place                                                                                                                                           | Surely time of year will dictate                                                                                                                                                   |

|         |                                                        |                                                                                                  |                                                                                                                                                         |
|---------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |                                                        | during the construction phase Final LEMP to include details of phasing plan                      | planting<br>Looking at other sites, any planting during construction is vulnerable and likely to be damaged.<br>Community involvement will not be safe. |
| 6.5.3.  |                                                        | Dead and dying stock would be replaced during the first five year phase                          | What about during the life of the solar farm?                                                                                                           |
| 6.5.15. | No species earmarked for the sites                     | Replacement trees would be like for like.                                                        |                                                                                                                                                         |
| 6.5.26  |                                                        | Details to be in LEMP                                                                            |                                                                                                                                                         |
| 6.5.36  | Area of grassland shown on plans.                      | Grassland phasing timing & construction phasing will be in final LEMP                            |                                                                                                                                                         |
| 6.5.34. |                                                        | All paragraph numbers changed.                                                                   |                                                                                                                                                         |
| 6.5.47  |                                                        | Establishment of Grassland for ground nesting birds would be established before construction     | Not a conducive environment for ground nesting birds!                                                                                                   |
| 6.5.48  |                                                        | LEMP will set outseeding for the remainder.                                                      |                                                                                                                                                         |
| 8.2.5.  | BH&N wildlife trust were mentioned previously          | Monitoring of ecological & ornithological receptors will be monitored in accordance to guidance. | Who will this be and what will it entail?                                                                                                               |
| 8.2.6.  | Overview of monitoring and reporting not commented on. | Final details in LEMP                                                                            | !                                                                                                                                                       |

Public Rights of Way Management Plan update changes May 2026

| Paragraph                                     | previously                                                                   | change                                                                                                                                                | comment                                                                                           |
|-----------------------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 2.4.1                                         | Consideration given to all day Saturday working.<br>No work on Bank Holidays | Only work till 13.00<br>Include Public Holidays                                                                                                       | Stop work not vacate the site                                                                     |
| Table pg 14                                   | No diversions required                                                       | Diversion for cabling on Pertenhall F 2b                                                                                                              | Should also apply to all footpaths                                                                |
| Page 16                                       | Banksman only for Keysoe & Bolnhurst B40                                     | Managed closure maybe needed                                                                                                                          | Too vague for a safety issue.<br>Contradicts Landscape & Ecology Management plan 6.3.16.          |
| 6.2.4                                         | Pertenhall Brook temporary diversion @ crossing point                        | Warning signs only for drivers and PRoW users                                                                                                         | Very dangerous point here                                                                         |
| 6.4.6                                         | Approximate gap between equestrians & drivers                                | B26 gap to be 50m – 100m specified                                                                                                                    | Needs to be one or other and switch off engine                                                    |
| 6.5.3. 6.8.4. 6.8.5. 6.9.2.                   | Temporary diversions K&B B37 & B 40                                          | Signage to warn PRoW users and Drivers                                                                                                                | Not safe enough                                                                                   |
| 6.9.3.                                        | Temporary diversion at crossing point of B37 & 40                            | Banksman @ crossing points & for cabling only temporary diversion and temporary surfacing for intensive construction                                  | Definition of intensive<br>How long for intensive.<br>No removal mentioned of temporary surfacing |
| 6.11.3.                                       | FP47 temporary diversion                                                     | Temporary fencing and signage for drivers                                                                                                             | What will the fencing do? The proximity is the issue.                                             |
| 6.14.2. 6.17.3 6.17.6. 6.18.3.6.19.3. 6.22.3. | Hail Weston B112/7, F112/8 112/5 Staploe F16, F4, F8 Temporary diversions    | Signage only                                                                                                                                          | Safety issue                                                                                      |
| 7.1.5.                                        | Operational phase no maintenance recording                                   | Condition of the PRoWs will be monitored quarterly and hazards noted and made safe when practicably possible or reported to the relevant authorities. | Too vague                                                                                         |

|                            |                                                                |                                                                                                                                                                                                                                      |                                                                                           |
|----------------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <b>7.2.3.</b>              | <b>Permissive paths to be closed for anti social behaviour</b> | <b>Antisocial behaviour to be recorded by site operator and relevant bodies informed, repeated incidents may lead to signage repeated may lead to closure</b>                                                                        | <b>No idea what constitutes anti social behaviour.</b>                                    |
| <b>9.1.2. 9.1.3.9.1.4.</b> | <b>Monitoring</b>                                              | <b>Regular assessment of condition &amp; accessibility<br/>All recorded and photographed<br/>If issue found record action<br/>If temporary measures are needed for safety will need LA approval for non routine maintenance work</b> | <b>Consider all to be the responsibility of the Solar Farm and their team of workers.</b> |
|                            |                                                                |                                                                                                                                                                                                                                      |                                                                                           |

# Site visit comparison

| 07.01.26                                                                                             | 08.06.26.                                                                                                                                     |
|------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| A1 to B645 stopping at Swineshead and going up Sandy Lane and back to car via church.                | No visit to this area                                                                                                                         |
| Riseley via Swineshead along Keysoe road and back to Green End                                       | "                                                                                                                                             |
| Onto Little Staughton church walked down church lane to spring hill then green end and up the by way | "                                                                                                                                             |
| Drove to Great Staughton walked along causeway and the town                                          | revisit                                                                                                                                       |
| Drove to Moor Road for 1.5k taking in views                                                          | No visit here                                                                                                                                 |
| Onto Duloe and Staploe and back via Little Barford to the A1                                         |                                                                                                                                               |
| viewed                                                                                               | Drove along Great Staughton road parked at New Farm walked westerly.                                                                          |
| Viewed                                                                                               | Drove to the Kangaroo and walked from Little Staughton Road to the junction.                                                                  |
| Not visited                                                                                          | Drive on great staughton rd to b660 stopped in lay by before mill lane keysoe and walking down the lane to the jarmans gate before returning. |
| Not visited                                                                                          | Drove across b660 to church road and viewed across the site.                                                                                  |
| Went to little staughton road and kangaroo                                                           | Drove down keysoe row east and back to the Kangaroo via little staughton road                                                                 |
| Not visited                                                                                          | Great staughton road to b645 to kimbolton then up to catworth on b660 onto a14                                                                |

no visits to Pertenhall or grange farm

## Proposed Digital Surveys.

The use of a digital survey of any description instead of an on the ground site survey is not considered to be acceptable. There may however be merits in drone and video walkovers being used in addition to the physical site inspection to refresh the inspector's recall of the site.

Video and drone alone would lose the impact that topography has on this area. The rolling countryside and open spaces gives a unique feeling to the participant. Video and drone and all photography flattens views, not giving a correct feel of the landscape. The enclosed impact on this unique character that this proposal would give will change the area completely and no planting would compensate for this.

There is also the issue of the existing footscape compared to what it would be like if the development is constructed is also of concern. The type of surface required for vehicle is not what is required on PROWs.

The proposed routes :

### **A1 –A2**

This needs does not show the impact that this would have on walkers and equestrians using the bridleway as it is hard on the BESS compound. The area should also be viewed from the ground to use the footpath up to High Wood which will also show how EPE would join the existing solar installation and one that already has planning permission. Only in person can anyone with a trained eye visualise the environment that would be created.

### **B1-B2**

This route shows how high the area is looking down over the site. This would be lost with cameras minimising the impact that would be made.

### **Point E**

This area needs to be visited, it is at the crossroads .Heading towards Pertenhall the site is flat and very visible from the road. It is also a shared access with a sheep farmer.

### **Point F**

This is a well used walk which at present is rarely used by farm vehicles.

It is already fenced on both sides and would make it very dangerous to be shared with an industrial use, especially with additional and higher fencing. The human experience is essential.

### **G1 –G2**

This is a steady slope from G1 – G2 with expansive view across the countryside the impact requires an on the ground experience.

## **H1 – H2**

This is along the ridge and the views from further along towards the Moat give a greater indication of how the area would be demoted in value.

## **I1-I2**

This area gives a reduced view as that from J1 –J2 looking down towards the Great Staughton Road.

## **J1 – J2**

This needs to be extended and walked in person. From here is a view from Birds Egg Farm, across Site A showing how the panels are proposed to go up the lower slopes of the facing ridge, shows how it sweeps behind St Peters church, down towards Green End, Great Staughton Road and the B660 down to Keysoe. It shows how the Brook and the footpath would be entrapped by fencing and panels The human eye alone would show the impact of this and also the proximity to rural houses, several of which are of modest size.

## **K1-K2**

This is not long enough and again requires on the ground presence, at present this is a relaxing walk for pedestrians away from vehicles on B660 on a grassy footpath. It is the route of the sewer.

The human eye alone demonstrates the channelled impact of this industrial landscape.

## **L1 –L2-L3**



Video and drone is not suitable for this area . It requires walking for the impact of how these dwellings are sandwiched both from front and the rear. It is also a habitat of a protected species.

Walking across footpath 35 will also show the poor hedgerow growth of Manor Solar and the tunnel affect it has to a once open space.

## **M1-M2**

There are very limited views of the proposed EPE site from here.

**Additional Viewpoint of Importance** not mentioned Footpath 14 leading from Wood End Lane.

This footpath rises steeply and prior to reaching the hedgerow crossing the site into Cambs. The Inspector should turn and look back the viewpoint will show a very visible site from Birds Egg Farm, rising upwards to the ridge of Middle Lodge and round towards St Peters church. This is a well used route both by locals and walkers coming to the area.