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Application Reference: EN010141

Applicant Cover Letter for Virtual Site Inspection Plan (Final)

I write on behalf of BSSL Cambsbed 1 Ltd (the 'Applicant') in relation to the **Virtual Site Inspection Plan [REP2-046]** submitted by the Applicant at Deadline 2.

The Examining Authority (ExA) set out at Item 8 in **Annex B** of the **Rule 8 Letter [PD-006]** that the Applicant provides the submission of a "*detailed flight plan for an Unmanned Aerial Vehicle (UAV) with a view to undertaking a comprehensive high-resolution video of the Public Rights of Way and other areas of the proposed development site that accords with the applicant's suggested sites for site inspections of Interested Parties suggestions.*"

The ExA requested that this plan was submitted by Deadline 2, and that Interested Parties should provide comments on the plan by Deadline 3. The comments from Interested Parties were published by the Planning Inspectorate on 29th May 2026.

The Applicant notes that the **Rule 8 Letter [PD-006]** did not set a timeframe for the Applicant to submit a final version of this plan (the Applicant's 'Virtual Site Inspection Plan') or a deadline for the submission of the video footage. The Applicant set out at paragraph 4.2.1 of the **Virtual Site Inspection Plan [REP2-046]** that it intended "*to undertake the Digital Surveys between Deadline 3 and Deadline 4, and to have them ready for submission at Deadline 4*".

The Applicant has therefore reviewed the comments submitted by Interested Parties at Deadline 3 and has updated the Virtual Site Inspection Plan where it considers such amendments necessary and appropriate to address the matters raised and inform the Examination.

Table 1 below sets out relevant comments received at Deadline 3, and how the Applicant has responded.

Table 1: Relevant comments received on the Applicant’s Virtual Site Inspection Plan

Interested Party	Examination Library Reference	Comment	Applicant Response
British Horse Society (Bedfordshire)	REP3-088	In our response to the draft ASI itinerary (REP2-060), we asked that what is now Survey Route 9b should be extended to the western end of the site. The western most point in the virtual Survey Route is a bit further along the route than was originally proposed but the whole route is still not being covered. We ask that point L3 is moved to the far end of the site, to what is viewpoint 9 in the LVIA.	The Applicant has made this amendment, as shown on Figure 1 of the final Virtual Site Inspection Plan.
British Horse Society (Bedfordshire)	REP3-088	At 2.2.1, it is proposed that the footage will be captured at, or as close as practicable, to typical human eye level. This is of course ideal for representing the experience of walkers on the PRoW and probably cyclists as well. But equestrians’ eyes are at a greater height (typically between 7 and 8 foot above ground, depending on the size of both horse and rider). The Society asks that the recording for the surveys along bridleways should be at that height (ideally in addition to the walker height recordings). This is particularly relevant for Survey Route 9b, where we consider that the experience of a rider will be significantly different from that of a walker/cyclist.	The Applicant has made this amendment and is proposing to capture the 360 footage from Digital Survey 9b from approximately 2.5m (just over 8 foot) above ground level, noting that this is generally accepted as the average height of a horse and rider.

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British Horse Society (Bedfordshire)	REP3-088	It is stated in 3.10.5 that views in each direction will be considered. In section 4 it is explained that if there are technical issues with hosting the videos, the Applicant will “undertake appropriate video capture from the source file to present a standard ‘single-frame’ video”. In this case, the Society asks that these single-frame videos should represent the views when moving in both directions (for all Routes).	The Planning Inspectorate has confirmed that they can accept 360 videos. However, the Applicant notes BHS’ request should there be any unexpected technical issues.
British Horse Society (Bedfordshire)	REP3-088	We ask that particular attention be given to the lines of sight available to the banksman proposed at the top of the access road into Site A (at the junction with the bridleway) and to the one proposed at the junction of BW37 and BW44. It would be worthwhile extracting stills from the walkover at each of these points along both these bridleways to show when the banksmen would be able to spot oncoming horses.	The Applicant has made this amendment, and is proposing a single 360 image capture as per ‘Digital Survey 13’ in the final Virtual Site Inspection Plan.
Borough of Bedford Local Access Forum	REP3-084	The ‘crossroad’ junction of B&K FP13 and B&K FP47 within Site B – this is viewpoint 33 in APP-129 and APP-135. This point is close to point F2 at the western end of Survey Route 3. Whilst it may just be a matter of the granularity of the map, it does look as if the Survey will start slightly to the east of the crossroad junction. BOBLAF recommends that the Survey should start just to the west of the junction and that care should be taken to ensure that the views in all four directions at that crossroad are recorded. Ideally, the operator would walk a few feet in either direction on FP13 as well as along FP47.	The Applicant has updated Figure 1 in the final Virtual Site Inspection Plan to make it clearer that Digital Survey 3 will extend west of the ‘crossroad’ junction between B&K FP13 and B&K FP47.
Elaine Wheeler	REP3-094	Route A1-A2 The area should also be viewed from the ground to use the	The Applicant has included ‘Digital Survey 11’ in the final Virtual Site Inspection Plan, which proposes to survey the footpath

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		footpath up to High Wood which will also show how EPE would join the existing solar installation and one that already has planning permission.	up towards High Wood Solar Farm.
Elaine Wheeler	REP3-094	Point E This area needs to be visited, it is at the crossroads. Heading towards Pertenhall the site is flat and very visibly from the road. It is also a shared access with a sheep farmer.	The Applicant maintains that an additional 360 would be of no benefit, and that the view from the Kangaroo is well represented by LVIA viewpoint 46 [APP-138].
Elaine Wheeler	REP3-094	Route 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, showing 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 Only the human eye would show the impact of this and also the proximity to rural houses, several of which are of modest size.	The Applicant included this route as shown by Stop East Park Energy in its suggested Viewpoint 2 [PDA-024]. The Applicant has extended point J2 further east as shown on Figure 1 of the final Virtual Site Inspection Plan.
Elaine Wheeler	REP3-094	Route 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, a consideration for the proposed use of so many HGVs.	The Applicant has extended point K2 further north as shown on Figure 1 of the final Virtual Site Inspection Plan.
Elaine Wheeler	REP3-094	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	The Applicant has included 'Digital Survey 12' in the final Virtual Site Inspection Plan, which proposes to survey Footpath 14 as suggested.

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		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.	
Stop East Park Energy	REP3-107	Route A1-A2 This route should also be experienced from ground level using the footpath towards High Wood in order properly to appreciate how the proposed East Park infrastructure would interact cumulatively with the existing solar installation and the additional consented solar development in the surrounding area.	The Applicant has included 'Digital Survey 11' in the final Virtual Site Inspection Plan, which proposes to survey the footpath up towards High Wood Solar Farm.
Stop East Park Energy	REP3-107	Point E SEPE considers this location particularly important because it demonstrates the visibility of the proposed site from the crossroads and along the route towards Pertenhall.	The Applicant maintains that an additional 360 would be of no benefit, and that the view from the Kangaroo is well represented by LVIA viewpoint 46 [APP-138].
Stop East Park Energy	REP3-107	Route J1-J2 SEPE submits that this route should be extended and physically walked by the Examining Authority. This location provides important views from Birds Egg Farm across Site A and demonstrates how the proposed arrays would extend up the lower slopes of the opposing ridge and sweep behind St Peter's Church towards Green End, Great Staughton Road and the B660 corridor.	The Applicant included this route as shown by Stop East Park Energy in its suggested Viewpoint 2 [PDA-024]. The Applicant has extended point J2 further east as shown on Figure 1 of the final Virtual Site Inspection Plan.
Stop East Park Energy	REP3-107	Route M1-M2 SEPE considers that views of the proposed development from this location are comparatively limited and therefore does not regard this as an essential location for digital recording.	The Applicant has retained this route, which was requested by Jonathan Hart at Procedural Deadline A [PDA-031].

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Stop East Park Energy	REP3-107	<p>Additional viewpoint of importance SEPE further identifies Footpath 14 leading from Wood End Lane as an additional viewpoint of particular importance.</p> <p>This footpath rises steeply before crossing into Cambridgeshire. SEPE submits that the Examining Authority should view the landscape from this location looking back towards Birds Egg Farm, the ridge towards Middle Lodge and St Peter's Church.</p>	The Applicant has included 'Digital Survey 12' in the final Virtual Site Inspection Plan, which proposes to survey Footpath 14 as suggested.

The Applicant notes that all Interested Parties that provided comments on the Applicant's Virtual Site Inspection Plan have highlighted that digital surveys such as those proposed are not equivalent to the experience of being on site oneself. The Applicant does not disagree, but is providing the digital surveys at the explicit request of the Examining Authority.

Digital surveys can provide useful contextual information regarding the arrangement of the Site and the surrounding landscape, but it is important to note that footage recorded in such a way does not replicate the experience of visual receptors at ground level, including users of public rights of way, residents or road users, as assessed within the LVIA which has been informed by verified photography / visualisation, and site visits. In particular, digital video footage can alter the perception of scale, openness, distance and visibility relative to views experienced by receptors on the ground. Consequently, the Applicant does not consider that such footage should be relied upon as a substitute for the assessment of landscape and visual effects, when compared to the assessment methodology set out within the LVIA, which is based on representative viewpoints, verified photography, field survey work and assessment in accordance with GLVIA3.

The final version of the **Virtual Site Inspection Plan** has been submitted alongside this cover letter, as both 'clean' and 'track change' versions to show the amendments that have been made since Deadline 2.

The Applicant now intends to capture the 'Digital Surveys' set out in the final Virtual Site Inspection Plan, for submission by **Deadline 4** on the 10th July 2026. The Applicant notes that this is subject to there being suitable weather and lighting conditions to capture the footage by Deadline 4, but given the time of year does not expect this to pose a constraint.

Please do not hesitate to contact the undersigned representative of the Applicant if you have any questions or require any further information regarding this submission.

Yours sincerely,



DCO Project Manager on behalf of BSSL Cambsbed 1 Limited

