

Submission ID: S4E7B8715

Bedford Borough Council have submitted five reports against Deadline 4.



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 10 July 2026
Ref. EPE 23-02405LPA/2.10D4

RESPONSE TO DEADLINE 4: Cover Statement

Dear Sir,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141).

BBC Reference No.: 25/01836/DCO | Examination Ref. [REDACTED]

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: The Proposed Development comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Proposed Development also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) ([REDACTED]@bedford.gov.uk) ([REDACTED]@bedford.gov.uk) (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Planning Committee Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]

Date: 10 July 2026

[REDACTED]: Head of Planning and Building Control

Craig Austin, Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

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1.0 INTRODUCTION

Context Cover Statement

- 1.1 This statement is prepared by Bedford Borough Council (the ‘Council’) in response to Deadline 4 (10 July 2026).

It is noted that:

- 1.2 The Council has reviewed the Applicant’s amendments as made by the [REP3] suite of documents and are currently in joint discussion with the other Host Authorities and the Applicant in reviewing matters and issues as identified – this remains work in progress (however, it is noted that good progress has been made which will be reflected in the submission of Statement of Common Ground against Deadline 5).
- 1.3 The Council has worked in collaboration with and has undertaken a joint co-ordinated review with the other Host Authorities of the Applicant’s various management plans and DCO Agreement. It is noted that in their submission the other Host Authorities may have gone into greater detail on specific matters and/or issues which have then been submitted under separate cover. The Council has reviewed these comments and, where applicable to the Council, the Council is in agreement with such comments made.
- 1.4 With regard to Compulsory Acquisition Hearing CAH1 (10 June) and the matter of securing land and property rights and powers as requested by the Applicant (as reference in the Land and Crown Land Plan [APP-008]; the Street Works, Rights of Way and Access Plan [APP-010]; the Draft DCO Agreement [APP-016]; the Book of Reference [APP-021]; the Land and Rights Negotiation Tracker [APP-022]; and, the outline Public Right of Way Management Plan [APP-159] or amendments):
- a) There are ongoing discussions in respect of the rights and powers to public highway (e.g. temporary closures, the alterations to highways, and the diversions of PROW), these discussions are progressing productively. The central concern for the Host Authorities is how such powers are approved, overseen, and/or enforceable by the Authorities when detailed submission and/or preparation of the final management plans are made.
 - b) Following legal advice, the Host Authorities are minded to secure these measures through a Side Agreement rather than through Protective Provision – this matter forms part of the on-going DCO Agreement discussion.
- 1.5 The Council notes the Examining Authorities written questions (ExAQ2) issued 23 June: *Flood Maps – Surface Water Climate Change: The Environment Agency updated the Flood Map for Planning on 28 May 2026 to add surface water climate change events and depth layers. Have you reviewed this information, and does it have any implications for the scheme and submitted documentation?* The Council responds:
- a) While there are some changes to the updated EA Flood Map for Planning flood extents, these do not appear to affect the proposed BESS. The Applicant has undertaken site specific surface water modelling and, subject to EA approval, this would supersede the Flood Map for Planning.
 - b) The updated Flood Map for Planning reflects the surface water flood risk mapping that has been applied in the submitted documentation. The updated mapping does not affect the catchment areas. In terms of the surface water drainage / SuDS design to

cater for impermeable areas and intercept overland flow, this would remain unchanged as this is based on the impermeable areas, 1 in 100 year storm and climate change uplift applied to calculate the storage volume, and then greenfield runoff discharge rate applied to control the discharge point to a watercourse.

1.6 The Council and Applicant acknowledge the Government's recent amendment to the Infrastructure Planning (Fees) Regulations 2024 and that as of the 8th June 2026, Councils acting on NSIPs now have a statutory route to recover all costs incurred for the duration of the Scheme in relation to NSIP applications. This would therefore address and conclude the issue of monitoring and/or s106 fees raised in the Council's Local Impact Report [REP1-071].

1.7 This Report is solely that of Bedford Borough Council, submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

2.0 DCO Agreement

2.1 The Council notes that various discussions have been had and are ongoing between the Host Authorities and the Applicant in respect to comments raised by the Host Authorities in their representations against the [REP3-009] Draft DCO Agreement (and related [REP3-011] Explanatory Memorandum) and versions thereof.

2.2 Engagement has continued since that submission, including a number of meetings with the Applicant and the exchange of comments and suggested amendments.

2.3 This work remains ongoing. The Host Authorities anticipate that any outstanding areas of disagreement or unresolved drafting points will be captured in the updated draft Statement of Common Ground (SoCG) to be submitted at **Deadline 5**.

3.0 Written Summary of Oral Representations made at Hearings (9th and 10th June 2026)

3.1 A written summary of oral representation made by Rebecca Condillac (AECOM) on behalf of the Host Authorities at Issue Specific Hearing 3 (ISH3) regarding landscape and LVIA comments in relation to PRoW is attached as Appendix A (these have been forwarded to the Applicant 29 June).

3.2 The Council has set out their written summary of oral representation made regarding ISH3 (PRoW), ISH4 (BESS), and CAH1 within the body of this cover letter and appendices against the appropriate aspects.

3.3 The Council has reviewed the written summaries of oral submissions made by the other Host Authorities in respect of the Hearings and are content to rely on these as applicable to the Council.

4.0 Technical Note reviews submitted under Deadline 4

4.1 In response to the question raised by the Examining Authority at the Issue Specific Hearings 3 & 4 (9 June) in relation to the replacement phase/ approach as set out by the Applicant in their [REP1-066] [REP3-075] 'Technical Note on Replacement Works', the Council has undertaken a detailed review of this Note and have submitted their response under separate cover as part of Deadline 4.

5.0 Management Plan reviews submitted under Deadline 4

5.1 **[APP-160] [REP3-058] Outline Public Rights of Way Management Plan:** the Council has reviewed the Applicant's outline Public Rights of Way Management Plan at both the

- principle and at the detailed (track-change) level. This review is submitted under separate cover as part of Deadline 4.
- 5.2 As part of the Council's oral representation at ISH3, the Council noted that they had prepared a 'PRoW Vision Route' strategy:
- a) This strategy illustrated the Host Authorities collective intent to create and/or enhance the countryside network of public rights of ways, bridleways, and contribute to the existing national cycleways, across the local sub-area to facilitate active travel between villages, towns, and towards point of destination;
 - b) The Council acknowledged that this strategy would be delivered as individual, possibly fragmented 'route-links', over the long-term. The Council noted that they have used this approach to inform <50MW solar farm applications and other applications in bringing forward significant enhancements to the existing PRoW network in the immediate area of this Scheme; and,
 - c) The strategy is submitted to the ExA to demonstrate how this Scheme could deliver improvements, enhancements, and create new links to deliver this broader sub-regional strategy (Strategy attached as **Appendix B**).
 - d) A draft of the strategy map was submitted at ISH3 to all Parties.
- 5.3 **[APP-161] Outline Soil Management Plan:** the Council has reviewed the Applicant's outline Soil Management Plan at both the principle and at the detailed (track-change) level, and has submitted this to the Applicant for comment. This review is submitted under separate cover as part of Deadline 4.
- 5.4 It is noted that the Applicant has submitted [REP3-060] outline Soil Management Plan which may have addressed some of the issues and comments raised in the Council's review. However, it is suggested that the Council's comments as submitted still stand.
- 5.5 **[APP-162] Outline Battery Safety Management Plan (oBSMP):** the Council has reviewed the Applicant's outline Battery Safety Management Plan at both the principle and at the detailed (track-change) level. A cover review is submitted as **Appendix C**.
- 5.6 With regards to ISH4 (BESS) the Council makes the following written summary of the oral representation made at the Hearing: the Council notes that this is highly specialised field, with infrastructure innovation and management approach moving at a pace that currently far exceeds existing regulations, legislation, and/or guidance. Consequently, the Council is not in a position to approve the detailed technical and management matters as set out in the Applicant's oBSMP and can only comment that the final management plan should '*substantially accord*' with the Outline BSMP.
- 5.7 Notwithstanding that the Applicant has concluded [PDA-019] Statement of Common Ground with Cambridgeshire Fire and Rescue Service, the Council felt it relevant to set out their issues of remaining concern (Appendix C).
- 5.8 **[REP1-036] [REP3-052] Outline Operational Environmental Management Plan (oOEMP):** the Council has reviewed the Applicant's outline OEMP at both the principle and at the detailed (track-change) level and have submitted this to the Applicant for review/comment. This review is submitted under separate cover as part of Deadline 4.

- 5.9 **[REP3-054] Outline Decommissioning Environmental Management Plan (oDEMP):** the Council has reviewed the Applicant's oDEMP and make the following comments:
- a) Table 5.1: the Council maintains its position that the long-term management of habitats and mitigation features created by the Scheme should remain secured by the Applicant with the landowners following decommissioning.
 - b) Table 5.3: the Council request greater specificity regarding ecological protection measures, including the use of indicative buffer distances for each habitat to ensure that the target is specific.
 - c) Table 5.3: the Council object to wording that implies tree felling would normally occur during decommissioning and consider that any such works should only occur by exception and be justified through the DEMP.
 - d) The Council suggests drafting amendments to improve clarity and consistency, including ensuring references are limited to the decommissioning phase.
 - e) It is suggested that the observations etal made against the Outline Operational Environmental Management Plan should also be read against the oDEMP.
- 5.10 **[REP3-064] Outline Surface Water Management Plan:** the Council has reviewed the Applicant's outline Surface Water Management Plan at both the principle and at the detailed (track-change) level and have submitted this to the Applicant for comment. This review is submitted as **Appendix D**.
- 5.11 **[REP2-034] Outline Archaeological Mitigation Strategy (oAMS):** the Council has reviewed the Applicant's Mitigation Strategy at both the principle and at the detailed (track-change) level and comment as follows:
- a) The current outline Archaeological Mitigation Strategy will require updating - the final form of the document will need to draw on the results of the completed evaluation and should cover elements of the Scheme including any maintenance works necessary during the operational phase and any works required during decommissioning phase in detail. The final form of the AMS may require multiple amendments and will need to be submitted to the Council for written approval prior to works on site being undertaken.
 - b) §6.1.4, Table 1: the Council has concerns that the proposed No Dig solutions may not be viable for all of the proposed sites within this table. However, the Council notes that the Applicant has stated they are committed to working with the Council(s) to explore alternatives where this is the case. These alternatives could be set out in the final AMS to be drafted following consent of the DCO if forthcoming.
 - c) Sections 7.4 and 7.5: the Council notes that there is still no detail on the measures that will be undertaken to control vegetation and scrub in areas where remains are proposed to be preserved by No Dig solutions. Further to this, no information is provided on species to be planted and their rooting depths etc. The Council is satisfied that additional information such as this can be agreed as part of the final AMS to be drafted following consent of the DCO if forthcoming.
 - d) Probably the biggest issue identified is that the Council suggests that the Applicant is

overly confident on the number of areas where they can utilise a ‘no-dig’ solution. The Council notes that alternative mitigation is available (just more expensive for excavation, or alternatively necessitating the removal of panels from the most sensitive areas) which may need to be reviewed/ adopted prior to the preparation of the final AMS.

- e) Broadly, the Council would suggest that the review identifies minor issues that can be overcome. However, in many cases these would actually need the completed evaluation to be undertaken prior to the final version of the AMS being drafted which will only take place following a grant of the DCO if forthcoming. It is suggested that the Applicant submits an indicative programme (including LPA approvals) accordingly to conclude such matters.
- f) In principle, the Council is supportive of the [REP2-034] Outline Archaeological Mitigation Strategy as tabled.

5.12 **[REP3-066] Outline Heritage Enhancement Strategy:** the Council has no comment to make on this strategy.

5.13 **[REP3-048] Outline Construction Environmental Management Plan (CEMP):** the Council has reviewed the Applicant’s Management Plan at both the principle and at the detailed (track-change) level. This review is submitted as **Appendix E**.

5.14 **[REP3-056] Outline Landscape and Ecological Management Plan (LEMP):** the Council has reviewed the Applicant’s Management Plan at both the principle and at the detailed (track-change) level. A cover review is submitted as **Appendix F**.

5.15 **Outline Management Plans:** the Council has not reviewed all the submitted Outline Management Plans on the basis that the above reviews have set out the Council’s in-principle observations and comments. On this basis the Council is currently NOT supportive of the following Management Plans, namely:

- a) [APP-162] Outline Battery Storage Management Plan
- b) [REP3-048] Outline Construction Environmental Management Plan (CEMP)
- c) [REP1-034] Outline Construction Traffic Management Plan (CTMP)
- d) [REP3-054] Outline Decommissioning Environmental Management Plan (DEMP)
- e) [REP3-056] Outline Landscape and Ecological Management Plan (LEMP)
- f) [REP1-042] Outline Public Rights of Way Management Plan
- g) [REP3-052] Outline Operational Environmental Management Plan (OEMP)
- h) [REP3-060] Outline Soil Management Plan
- i) [REP3-062] Outline Waste Management Plan
- j) [REP3-064] Outline Surface Water Management Plan

5.16 It is noted that the outline Management Plans need to be read in-conjunction and resolved with the [REP3-009] draft DCO Agreement which is currently under discussion between Parties. Both Parties are engaged in constructive engagement to review comments and amendments accordingly with the intent to update their position in the Statement of Common Ground to be submitted at Deadline 5.

6.0 Community Benefit Fund

6.1 The Applicant has appointed an independent third-party organisation, Community Energy

Pathways (CEP), to support the Scheme and aid in the delivery of a Community Benefit Fund (CBF). The Host Authorities have recently engaged with CEP, alongside ward councillors and parish councils, and discussions are ongoing regarding the scope, governance, and operation of the fund.

- 6.2 It is noted that a Community Benefit Fund is not a planning consideration, but a voluntary commitment as made by this Applicant against this Scheme.
- 6.3 Under correction, it is understood that the Examining Authority at Issue Specific Hearing 4 (ISH3) raised the option that the Community Benefit Fund could be used to support the creation or enhancement of public rights of way (PRoW) should fund beneficiaries choose to prioritise such projects. The Council considers that any necessary PRoW enhancements arising from the impacts of the Scheme should be secured and delivered directly by the Applicant as mitigation and enhancements, rather than being dependent on the discretionary allocation of the Community Benefit Fund. While the Council acknowledges the potential role of the Community Benefit Fund, discussions regarding the fund remain at an early stage and is subject to third-parties. No conclusions have yet been reached as to its feasibility, structure, or specific uses.

The Council trust that this information is of assistance to the Examining Authority. Should you wish to discuss any matters raised in the submissions made against Deadline 4, then please do not hesitate to contact the Lead Case Officer by email.

PD-QA/8pg end

APPENDIX A: Written Summary of Oral Representation made at Hearing (ISH3) PRow

(Rebecca Condillac – Landscape and Visual Amenity; AECOM on behalf of the Host Authorities)

(ISH3b) PRow and Landscape - the Applicant will be asked to explain its overall approach on the impact on views by users of the PRow network, significant effects and mitigation proposed.

RESPONSE:

Significance ratings in relation to receptors along the PRow network

1. It is noted that wherever there is a moderate effect on visual amenity this is taken to be non-significant, noting the methodology indicates it could and, in some cases, should be a significant effect as stated in Environmental Statement (ES) Appendix 5-1 LVIA Assessment Methodology P01 [APP-069]:

Paragraph 5.2.6 'Greater than 'moderate' effects are more likely to be significant. This does not preclude a 'moderate' effect or lower being significant or a greater than 'moderate' effect not being significant. This judgement will depend on the specific circumstances being considered.'

2. The Host Authorities overall conclusion in respect of this is that there is some slight under-representation of significant effects and that the screening of views as a result of mitigation planting has generally been assessed as an improvement to magnitude of impact and not been assessed as a potentially adverse change.

PRow and mitigation

3. Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the landscape mitigation to screen the solar panels. However, any effects of obstructed or truncated views, as a result of mitigation planting, are not referenced and will adversely change the experience of users of PRow.

4. Paragraph 6.11 of the Bedford Borough Council Local Impact Report [REP1-071] states:

'Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the landscape mitigation to screen the solar panels, but any effects of obstructed or truncated views are not referenced and will adversely change the experience of users of PRow. Similar to the comments for landscape character, it is noted that wherever there is a moderate effect on visual amenity this is taken to be non-significant, noting the methodology indicates it could and, in some cases, should be a significant effect.'

5. Within ES Chapter 5 Landscape and Visual P01 [APP-041] a selection of viewpoints where mitigation encloses views alongside PRow are assessed as significant for the duration of the Proposed Development.

6. There are also a number of viewpoints where mitigation encloses views alongside PRow and impacts are assessed to be significant during construction, reducing to non-significant effects from Year 0. During the Issue Specific Hearing 3 on Public Rights of Way, the Applicant provided evidence in relation to Viewpoint 12 and the assessed moderate adverse (non-significant) effect, arose as a result of the retention of part of the open view from that location. This is at odds with the assessment for impacts on PRow users where assessed impacts are reduced to non-significant effects at Year 10 when there is a total enclosure of the view from solar panels and/ or mitigation planting. Examples within ES Appendix 5-4 Effects at Viewpoints P01 [APP-072] include:

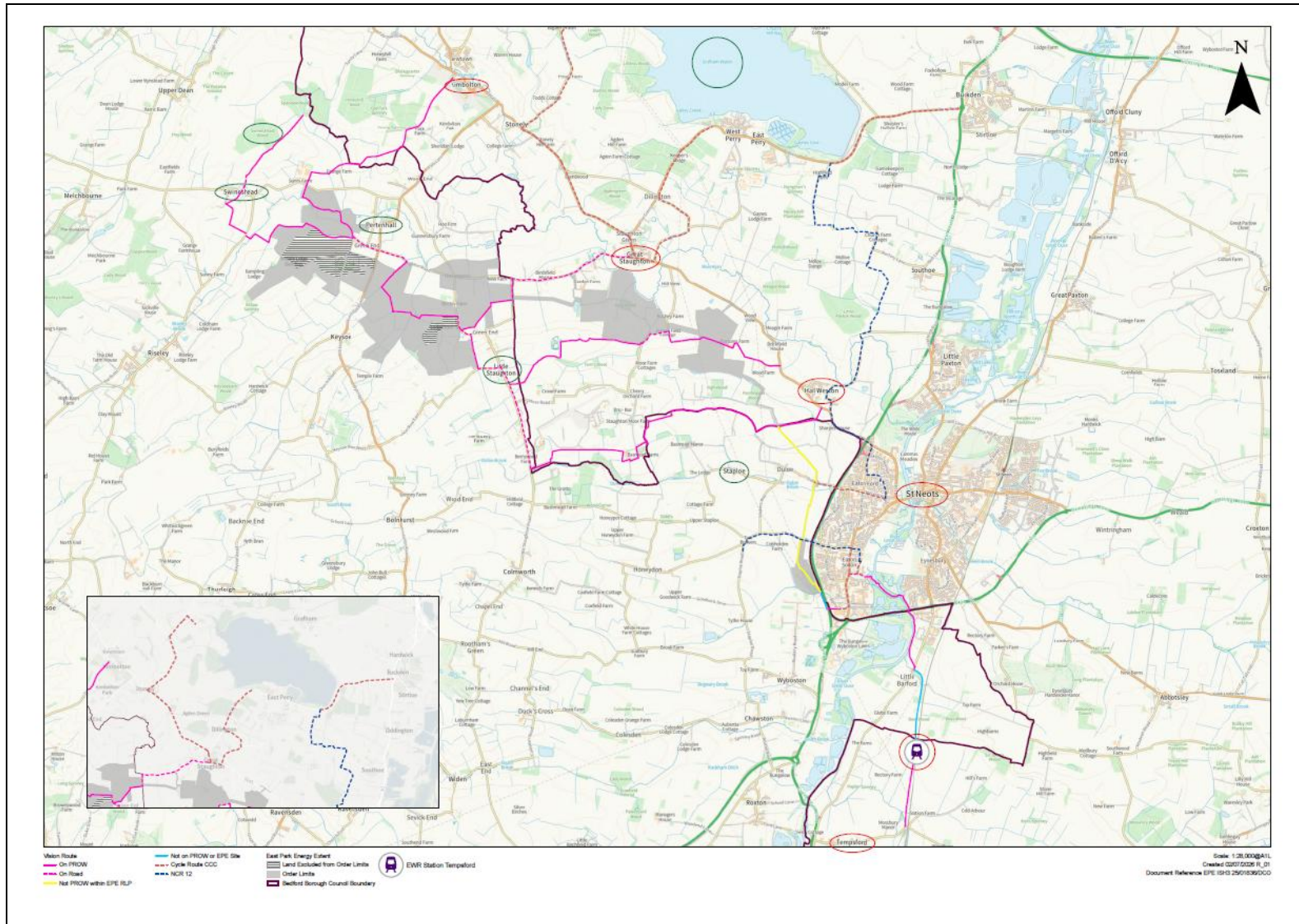
- a. Receptors at viewpoint 15 (Footpath 29) as illustrated on Figure 15.19 Viewpoint 15 [APP-131] are assessed to result in a major adverse significant effect during construction, reducing to

moderate adverse non-significant during year 0, and further reducing to minor to moderate adverse non-significant effect at Year 10. The view to the north-west along a large stretch of the footpath will contain views of solar PV panels during the early stages of operation. Once hedgerow vegetation is established, by Year 0 the view will be enclosed by hedgerows, reducing the extensive views.

- b. Receptors at viewpoint 77 (Bridleway 112/7) as illustrated on Figure 15.81 Viewpoint 77 [APP-142] are assessed to result in a moderate to major adverse significant effect during construction, reducing to moderate adverse non-significant during Year 0, and further reducing to minor to moderate adverse non-significant effect at Year 10. The proposed mitigation would enclose the view, although it is noted that there are gaps in the vegetation which allow for buried utilities, mitigation largely restricts views along the line of the PRoW.
 - c. Receptors at viewpoint 78 (Footpath 112/5) as illustrated on Figure 15.82 [APP-142] are assessed to result in a moderate to major adverse significant effect during construction, reducing to moderate adverse non-significant during Year 0, and further reducing to minor to moderate adverse not significant effect at Year 10. There would be views of solar PV panels along the majority of the route, although it is noted that there is an existing solar farm located to the south that may be visible at points along the PRoW.
7. While the Council acknowledges that the screening planting as proposed within the Scheme does provide landscape screening benefits, in terms of overall landscape character, setting and specifically regarding views from the PRoW Footpaths and Bridleways this will result in adverse visual impacts in terms of reading the broader, open landscape – this will adversely change the experience of users of the PRoWs. The effects of obstructed or truncated views are not referenced by the Applicant and are not fully addressed in the LVIA.

end

APPENDIX B: (ISH3) ProW Vision Route Strategy



APPENDIX C: (ISH4) and [APP-162] outline Battery Safety Management Plan

REVIEW and OBSERVATIONS:

1. As noted by the Council in their [REP1-071] Local Impact Report para 4.1, Matter 77 (Insurances) et al, the Council does not have the necessary professional and/or technical disciplines specifically relating to solar farms and BESS development's infrastructure, associated health and safety responsibilities, etc. to respond on this Management Plan against these aspect and consequently will only make in-principle observations in this Examination on planning matters and/or issues in-so-far as they affect the Scheme.
2. [REP1-071] Matter 76(c)(v) (BESS Firewater), Matter 98 and Matter 99: *'The Applicant states in [oBSMP] para4.5.6 that the capacity of the surface water drainage system to contain firewater runoff has been calculated to 'accommodate a reasonable worst-case scenario'.* However, no volumetric calculations are evidenced in firewater/ stormwater ponds layout/design/capacity to confirm this matter. The Council view this as a significant potential environmental risk.

It is suggested that this Matter was raised by the ExA at ISH4 with the request that the Applicant submit detailed drawings of the water retention basin/ lagoon to evidence effect on the landscape in terms of any cut&fill undertaken and bunding, and that the volume capacity committed to can be attained. This request remains outstanding.

3. [APP-162] oBSMP §1.2.1: rather than stating *'relevant local planning authority'*, this should be changed to solely state Huntingdonshire District Council. This should also be reflected in [REP3-009] DCO Agreement, Schedule 2, Part 1 (10)(1) and (3).
4. oBSMP §1.5.3: this should reflect the commitment made by the Applicant against [REP1-071] Local Impact Report Matters 70 and 71 – "(or any subsequent equivalent standard)".
5. oBSMP §1.6.1 to 5: it is unclear why these historic statements are incorporated within the Management Plan.
6. oBSMP Table 1 (1.5): in-principle, the NFCC Guidance carries no weight and consequently, in discussions the Council has had with the respective Fire & Rescue Services, they do not have the powers and are reluctant to 'approve' any oBSMP or similar. This matter rests with the Applicant.
7. oBSMP §2.5.1 and §4.3.4: it is noted that the battery system enclosure and water storage tanks will be mounted onto concrete foundations but there is no reference in [REP3-054] para2.4 Decommissioning Programme for their removal – this should be updated to reflect the Environmental Statement's commitment accordingly.
8. oBSMP §4.4.1: *'The proposed BESS will have a robust and validated emergency plan, developed in consultation with CFRS'.* It is suggested that this commitment is expanded to address environmental matters, namely –*'and the Environment Agency (EA). Where an incident has the potential to affect surface water or groundwater, the Emergency Response Plan (ERP) will include priority notification and escalation procedures for the EA and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the EA, the lead local flood authority and the Operator, will be made aware of the ERP and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters'.* Text as set out by third-parties.

9. oBSMP §4.4.4: *'An Emergency Response Plan will be developed post planning consent to facilitate effective and safe emergency response'*. It is suggested that this critical H&S Plan' commitment should be reworded; namely:
'An Emergency Response Plan will be developed by the Applicant in consultation with the necessary statutory authorities and submitted to and approved in writing by Huntingdonshire District Council no later than three-months post planning consent'.
10. oBSMP Chp 4.5 (Surface-water run-off) the Applicant made the following statement which should be included within this Chp – *'Isolation will be capable of automatic activation (from the BESS fire alarm system) during an incident, with manual override provided as a secondary control. Isolation valves will be designed to operate on a failsafe basis, such that in the event of power loss, system fault or damage during an incident, the default position is closed to maintain containment. Power supply arrangements may include independent or solar-backed systems where appropriate, ensuring that valve operation is resilient and not reliant solely on the primary site power infrastructure. The automatic and manual isolation systems would be subject to regular [as a minimum annually] operational maintenance to ensure the reliability of the firewater isolation system in a flood event. The detail of this maintenance will be included in the detailed Battery Safety Management Plan once the detailed design of the Proposed Development has been completed'*. Applicant to review that this strategy is set out in the oBSMP.
11. oBSMP §4.57: this should be amended as follows (in italics): *'Following a fire event, retained water will be sampled and analysed to confirm whether pollution has occurred, UK accredited labs would be used for water testing. If contaminated (polluted), the water will be removed from site by tanker for treatment at an appropriate offsite facility. If testing confirms that the water is suitable for discharge, it will be released to the local drainage network under controlled conditions, in consultation with the relevant regulators. Where required, an Environmental Permit or other applicable consent will be obtained prior to discharge. No release will occur without prior approval from the relevant regulator, and all actions will be undertaken in accordance with applicable environmental permitting and pollution control legislation. This approach ensures that environmental protection is maintained under both normal and emergency conditions'*. Text as suggested by third-parties.

Agreement

12. As noted by the Host Authorities at the ISH4 (BESS), due to the potential that a BESS fire could be a major incident, they would require that the necessary Battery Storage Management Plan and associated Emergency Response Plan are submitted and approved and that the related facilities/ infrastructure required to enable these plans are constructed and tested PRIOR to any BESS equipment being brought on Site to ensure absolute safety to the surrounding local community. This conditionality may need to be written into the DCO Agreement.
13. In terms of the [REP3-009] DCO Agreement, Schedule 2, Part 1 (10)(1)(2) – it is unclear why the wording *'to the extent that it is applicable to that phase'* is used as in (4) the BSMP is made applicable to all phases. If this reading is correct, then the BSMP should have some address to both the replacement campaigns and to the Decommissioning Phase. Applicant to clarify or address as required.

General

14. While it is not a planning matter, in discussions with the two Fire & Safety Rescue Services, they noted their lack of funding to enable trainings and purchase of the necessary equipment to deal with major BESS fires. The Applicant stated that they would engage with both Services to address this matter but to date no further progress has been stated. As such training and equipment may

be essential to executing the Applicant's BSMP, it is requested that an update is tabled by the Applicant in this regard.

CONCLUSION

15. In-principle, Bedford Borough Council have no further comments to make against the [APP-162] outline Battery Safety Management Plan.

end

APPENDIX D: [REP3-064] outline Surface Water Management Plan

REVIEW and OBSERVATIONS:

1. The general terminology of the management plan should be one of a stated commitment – ‘shall’, ‘will’, ‘enact’ rather than may, would, ‘subject to’; i.e. where the Applicant has given an undertaking against the Environmental Statement or responses these need an absolute statement of mitigation/ delivery/ enactment etc. within the management plan (regarding approach, refer to other management plan reviews regarding the need for SMART management tools).
2. Figures 1, 2 and 3 have not been provided.
3. Annex 1 and 2 have not been provided (refer to other management plan’ reviews regarding the need to submit supporting material/ reports which form part of the management plan for Council review).
4. In Chp 1.1 (Purpose), the Management Plan should refer/ make reference to the commitments made in the Environmental Statement regarding mitigation and enhancement as these commitments are the benchmark against which this MP will be structured, is to be managed, and is to be maintained.
5. Section 1.3 and Chp 2 are a near duplication across all the various management plans but are not required to form the scope of this oSWMP, suggest that this is set out once in the oOEMP to attain absolute clarity across all management plans.
6. The oSWMP makes reference to the operational and decommissioning phases but no mention of any works activity related to the replacement campaign. Further, the actual activities set out in Chp5 are unmeasurable and hence un-enforceable – these all need to be SMART (by example, §4.1.8 makes a statement regarding water quality monitoring but does not set out how this is to be undertaken).
7. The proposal to use (§4.1.9) V-shaped ditches to proposed access tracks needs to be read against works damage that may occur to existing habitats; issues relating to topsoil management (as set out in the oSMP); and, issues relating to safe access to PRoW where the Applicant proposes using the PRoW network where such ditches may create hazards to bridleways; et al.
8. Filter strips (§4.1.10 -11) and silt fencing (§4.1.12) it is unclear if these measures will be removed post construction and if they may be used during the replacement campaign.
9. The Applicant sets out (§4.1.26) Spillage Risk but does not set out the measures of reporting, management, responsibilities, and remediation measures to be undertaken should spillage occur.
10. The Council raises several concerns regarding §6.2.3 *‘The access tracks throughout most of the Site will be constructed of permeable compacted stone, except for the tracks within and around the BESS and Substation compound and the track along the access route from the Main Site Access at the B645. Tracks internal to the BESS and Substation compounds will be constructed of concrete or asphalt’*, namely:
 - a) *‘permeable compacted stone’*: the Access Tracks as proposed on [APP-121] Illustrative Environmental Masterplan are extensive across the Scheme – Applicant to confirm that the potential importation of such material was assessed in the Environmental Statement; and, that such material will be removed at decommissioning.
 - b) *Main Site Access*: Applicant to confirm if this construction and materiality will also apply to the secondary emergence access to the BESS (Ref. [APP-121] Fig. 2-1k); and, that such

material will be removed at decommissioning.

- c) *BESS and Substation compounds*: for the purposes of clarity, it is assumed that this is the 'impermeable surface' referred to [APP-121] Fig. 2-1k); and, that such material will be removed at decommissioning (statement also applies to §6.5.7)
 - d) It is suggested that these statements and commitments need to then be transferred to the oOEMP and oDEMP.
- 11. §6.5.2 *'the grassland should be established once the solar panels are in place and would be able to prevent scouring along the panel driplines'* - two issues arise a) the Applicant should set out a strategy that, should the grassland establishment fail, details what remedial actions will be undertaken; b) the Council has set out in written representations their concerns that there may be scouring along the drip line throughout the Operational Phase – it is unclear if this matter has been addressed by the Applicant.
 - 12. §6.5.6-7 *'...impermeable and surface water run-off will be directed towards the adjacent detention basin. In normal operation the basin will allow for the attenuated discharge of surface water run-off into the proposed swale and then into an existing unnamed watercourse'* and §6.5.12 *'will deliver adequate treatment of the run-off'* - as some of the surface water run-off may be contaminated from maintenance/ industrial activities associated with the BESS, substation, Operations and Maintenance Building, and surrounding compound this water will need to be tested prior to release into the surrounding watercourses, a requirement of the ES, or at least, the Applicant will need to set out a strategy to evidence 'adequate treatment' and measures should this fail.
 - 13. It would assist clarity if the 'SuDS feature', 'basin-swale', 'drainage feature', 'lagoon (detention basin)', and 'BESS and substation retention basin' were titled consistently across all documentation.
 - 14. Table 6 should be set against phases; should address testing regime to ensure compliance; and, should set out measures of habitat, landscape and/or water quality failure should this occur.
 - 15. Chp7 *'Further guidance provided in this document on construction activities, vehicle access/maintenance, felling and spillage control would also be followed to further ensure pollution control'* and *'it is recognised that some areas on site are more vulnerable than others and these may require additional surface water protection measures, including implementing a number of measures in series to ensure adequate treatment'* - any such guidance/ measures should be set out in the oSWMP as part of the Examination.

CONCLUSION

- 16. As currently tabled and as reviewed by the Council, the [REP3-064] outline Surface Water Management Plan is lacking detail, clear commitments, and assurances as would be required of a long-term (40-year) management strategy. On this basis, the oSWMP is NOT Supported.

end

APPENDIX E: [REP3-048] Outline Construction Environmental Management Plan (oCEMP)

REVIEW and OBSERVATIONS:

1. §1.1.5: suggest amending text to: 'This oCEMP is a control document that will be certified by the Secretary of State as part of the DCO and implemented via a requirement in Schedule 2 (Part 1, Article 5) of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the final CEMP(s) produced for any phase of the Scheme (see paragraph 2.4.6* below for more information) will be in substantial accordance with this oCEMP, and approved by the relevant local planning authority (LPA) before construction commences'. *paragraph as currently numbered in the DCO.
2. Section 1.3 and Chp 2 are a near duplication across all the various management plans, suggest that this is set out once in the oCEMP and oOEMP to attain absolute clarity across all management plans.
3. Across the oCEMP the use of the word 'temporary' should be redefined as noted elsewhere.
4. Chp4: it is suggested that like topics (text in bold blue) are grouped together around certain activities or subjects rather than as currently presented as a random list of activities – this will aid clarity and reading. Further, these topics should have some reference to the Environmental Statement's commitments, mitigation and enhancement measures to control/ manage harm. Most of the text has no reference point against which the topic/ activity can then be measured (this observation would also apply to Tables 5).
5. Table 5.3 (Great Crested Newts): the Council seeks further clarification on the measures proposed to prevent offences relating to great crested newts and awaited the updated Reasonable Avoidance Measures document
6. Table 5.3 (Bats): the Council consider that insufficient information has been provided to demonstrate how impacts on trees with bat roost potential would be avoided and request further detail on mitigation measures, including surveys, buffers, timing restrictions and working methods.
7. Table 5.3 Trees): suggest text amended – 'Hedgerows to include a minimum 6m buffer, *extending beyond this to include the full root protection zone for retained trees where this extends beyond 6m, and excluding any locations where points of widening or crossing points, in which no works (other than landscaping) are to occur* ~~extending beyond this to include the full root protection zone for retained trees where this extends beyond 6m, and excluding any locations where points of widening or crossing points, in which no works (other than landscaping) are to occur~~'.
8. The following appendixes as stated have not been submitted:
 - a) Outline Construction Dust Management and Monitoring Plan
 - b) Ecological Reasonable Avoidance Measures Method Statements
 - c) Unexpected Contamination Protocol [BBC-RR-136]
 - d) Peat Management Plan [BBC-RR-154]
 - e) Control measures for the former oil pipeline [BBC-RR-161]
9. General comments across the entire suite of management plans apply to the oCEMP.

CONCLUSION

10. As currently tabled and as reviewed by the Council, the [REP3-048] outline Construction Environmental Management Plan is lacking detail, clear commitments, and assurances as would be required of a long-term (40-year) management strategy. On this basis, the oCEMP is NOT Supported.

end

APPENDIX F: [REP3-056] Outline Landscape and Ecological Management Plan (oLEMP):

REVIEW and OBSERVATIONS:

1. §1.1.3: suggest amending to as noted in the oCEMP above.
2. §2.6.4 -5: This section needs some clarification and linking to other measures that are proposed to ensure that the County Wildlife Sites (CWS) adjoining the Site will be protected against the Scheme's impacts.
3. Section 3.4: the Council requests greater detail and clarity regarding buffer distances to retained vegetation, trees and public rights of way (as requested by the Council in various representations to date).
4. Section 3.5: this should clearly set out what landscape is provided as mitigation and/or enhancement, and that which is to be instated for BNG purposes so that this can be monitored and enforced accordingly.
5. Section 3.6 and Table 1: the Council requests clarification and justification regarding the proposed Biodiversity Net Gain commitments; habitat classifications and target conditions, including the rationale for targeting woodland in poor condition; clearer identification of grassland habitat types; and, stronger provisions for monitoring and securing BNG outcomes.
6. §3.6.2: suggest amending as follows: 'At the detailed design stage, the Applicant will seek to maximise BNG as far as practicable (as per Design Principle 4.1 secured by the Design Parameters and Principles Statement [EN010141/DR/7.1]). ADD - *Whilst maintaining the minimum BNG commitments set out in paragraph 3.6.1. opportunities to increase BNG beyond the committed position will be considered through detailed design, including opportunities to increase watercourse units where practicable.* DELETE – remainder.
7. §3.6.3: suggest additional text: '...Scheme. ADD - *Any deviation from the habitat types, target conditions or timescales identified in Table 1 should be justified and agreed with the relevant local planning authority, with confirmation that the BNG commitments remain achievable.* Additional details of the BNG Assessment are provided in the **Biodiversity Net Gain Report [EN010153/DR/7.17]**'.
8. §4.2.1: the Council suggests that the Landscape and Ecological Management Plan Steering Group should be established within six-months of the commencement of the operational phase.
9. §5.3.46: the Council and Cambridgeshire County Council would welcome discussions with the Applicant regarding the proposed measure proposed to address anti-social behaviour. The Council would request entry into a formal agreement outlining the terms, and introduction of a mechanism for ensuring the terms are observed.
10. §7.1.3: request whether text could be added to advise that the ongoing height management of hedgerow would be lower than the three metre as set out in this oLEMP and would be in accordance with the prevailing height of hedgerows in the surrounding area.
11. §8.2.3: request clarification whether monitoring reports are to be submitted to the relevant LPA, or LPAs where monitoring relates to land within both administrative areas, at the stated monitoring intervals. This should be confirmed for consistency and to support long-term oversight of the LEMP and BNG commitments.

12. Appendix A: updated appendices and illustrative landscape proposals have not been provided for review and the Council reserves its position pending assessment of the revised material.
13. Appendix C (Outline Farmland Bird Mitigation Strategy):
- a) The Council comments that this strategy document would benefit from a statement confirming that the oLEMP is a committed document secured through the DCO (Paragraph 1.1).
 - b) The Council seeks clarification and consistency regarding habitat descriptions and terminology (Paragraph 2.2).
 - c) The Council seeks further detail to confirm the linkage between construction phasing and the provision of mitigation habitats, and considers the proposed approach to landscaping implementation to be too open-ended and requests a clear timetable for initial habitat creation and completion of landscaping within each phase (Section 5.2).
 - d) The Council considers that additional detail is required regarding the size and timing of habitat creation areas and states that a table clearly showing expected habitat losses and gains and when these will occur is required and requested by the last deadline (Section 5.2).
 - e) It is suggested that an additional aim relating to the early establishment of mitigation habitats should be included to limit impacts on birds during the construction phase (Table 5.1).
 - f) Finally, the Council notes that, without evidence regarding when habitat creation will occur relative to construction, it is not possible to verify whether the expected changes in conservation status are realistic (Table 7.1).
14. ISH3 (PRoW) Tree sizes: it is noted that at the ISH3 a question was raised regarding the bought size of all plant material – the Applicant was to revert.
15. ISH3, Table 2 (Permissive Routes) and §5.3.44: the statement that *‘The final route, signage, waymarking, surfacing material and widths of proposed permissive paths will be defined in the final LEMP’* is in-principle not accepted by the Council. Some basic specification needs to be submitted by the Applicant for the Council to review if these routes contribute to actual access to the countryside, offer safe access, and address Active Travel requirements. The statement that the surfacing will be ‘grass’ does not address the Council’s understanding if these routes are level, cleared access, or a pathway over rough terrain.
16. §6.3.7: *‘Watering [RC18.1] of planted areas (including woodland and hedgerows) would generally be undertaken....’* - there is no quantifiable measure of how much water per plant/ m2 or what events would trigger the need for watering and frequency. Further, as noted by the Council, there are water pressure issues in the surrounding area and consequently the Operator should not rely on the water mains to obtain water.
17. General comments across the entire suite of management plans apply to the oLEMP.

CONCLUSION

18. As currently tabled and as reviewed by the Council, the [REP3-056] Outline Landscape and Ecological Management Plan (oLEMP) is lacking detail, clear commitments, and assurances as would be required of a long-term (40-year) management strategy. On this basis, the oLEMP is NOT Supported.

end



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 8 July 2026
Ref: EPE 23-02405LPA/2.10D4

RESPONSE TO DEADLINE 4 Review of: [REP3-075] Technical Note on Replacement Works

Dear Sir,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141).

BBC Reference No.: 25/01836/DCO | Examination Ref. [REDACTED]

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: The Proposed Development comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Proposed Development also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) ([REDACTED]@bedford.gov.uk) ([REDACTED]@bedford.gov.uk) (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Planning Committee Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]
[REDACTED]: Head of Planning and Building Control

Date: 8 July 2026

Craig Austin, Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

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1.0 INTRODUCTION

1.1 Context of this Report

- 1.1.1 This report is prepared by Bedford Borough Council (the 'Council') in response to the question raised by the Examining Authority at the Issue Specific Hearings 3 & 4 and CAH1 (9 & 10 June) in relation to the replacement phase/ approach; and, is submitted as part of Deadline 4 (10 July).
- 1.1.2 It is noted that in response to matters raised by the Host Authorities (for example within their Local Impact Reports) regarding how the Applicant was going to manage replacement works, the Applicant has prepared [REP3-075] Technical Note on Replacement Works, the Council's review of which is the subject of this report.
- 1.1.3 This report also represents the Council's written representations of oral representation made at the Hearings noted above.
- 1.1.4 To aid reading, the Council's central observations are set out below, with a more detailed review and commentary of the Technical Note set out as track changes and/or comments within the Note itself, attached as an Appendix.
- 1.1.5 Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submitted under separate cover for individual procedural sign-off purposes.
- 1.1.6 This review remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification within any further updated submitted material or similar to the Examination. The Council remains open to discussion.
- 1.1.7 This Report is solely that of Bedford Borough Council, submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

1.2 Review and Observations

Review

- 1.2.1 While the Council is in broad agreement with the statement made by the Applicant that *sic* the impact, and consequently the assessment/ mitigation of Operational (replacement) Phase is **less than** that of the construction phase, such works/ commitments as required should still be reflected/ set out within the [REP3-052] outline Operational Environmental Management Plan (oOEMP) as works to be undertaken in their own right (by example, the management and maintenance works as provisionally identified in [APP-038] The Scheme, §2.6.5-9 should be transposed into the oOEMP and other relevant Management Plans). Currently this is NOT evident.
- 1.2.2 The Applicant's statement, as set out in [REP3-075] Technical Note §1.1.6 '**to ensure that such works do not give rise to any materially new or materially different environmental effects compared to those identified in the environmental statement**', needs to be reflected in the oOEMP with the Applicant setting out a strategy as to how this is monitored, maintained/ managed, and what remedial/ recourse actions are enacted by the Operator should the effect/ harm be identified as being greater or if new effects are identified. Currently this is not addressed.

- 1.2.3 Secondly, the statement does not address how the Council will be able to monitor and enforce such commitments (with potential financial and/or stop-work penalties). This remains a concern for the Council.
- 1.2.4 With reference to the [REP3-075] Technical Note (TN) - major replacement campaign(s) assessing affect: to the general statement made by the Applicant that *sic* 'the assessment impact/ mitigation measures of replacement works is/ will be *less than* that of the construction works', and consequently no stand-alone Replacement Phase Management Plan is required, the Council has reviewed this as follows:
- a) Operational (major replacement campaign) Phase: solar panels - there are 695,760No. panels therefore 20% = 139,152No. panels (Ref. TN§2.3.12).
 - i. This is a substantial number of PV panels that will need to be removed, stored, and transported on and off site, as well as their replacements being brought to site. This may require the original construction phase compound being reinstated, a series of new satellite compounds being created, former construction phase routes/ tracks being reconstructed. This remains unclear and it would aid understanding if emphatic statements were made in each regard.
 - ii. It is suggested that there is potentially a not insignificant level of HGV movements generated by the replacement activity. The Applicant has stated that the internal haulage routes from site C to D, and access for the construction phase, will not be retained during the operational phase. Therefore, details route logistics are required from the Applicant to evidence how panels will be delivered to site C and beyond, and how any new impacts to the highway network as identified during replacement are to be mitigated. The Council notes [REP3-075] 'Appendix A: Proposed operational access strategy plan' but it is unclear whether this is also submitted to illustrate the replacement campaign vehicle activity. If so, it illustrates the considerable traffic generated on the public highways – this should be evidences as being *less than* that identified during the Construction Phase.
 - b) (TN§2.3.12) Work activity: 420No panels can be replaced by a single crew per day:
 - i. Say single crew/day at five-day working week: 20% replacement = 332 working days/ 67 weeks/ c. 17-19months.
 - ii. Say 2No. crew: 20% replacement/ 166wd/ 34w/ c.8.5 - 9.5months.
 - iii. Say 3No. crew: 20% replacement/ 111wd/ 23w/ c.6 - 6.5months.
 - i.e. While it is acknowledged that this activity may occur every c. 20-years, the works' duration could be between 6 to 19 months (allowing for some flexibility and weather). The latter is not insubstantial and consequently such replacement duration(s) should be acknowledged in its own right by the Applicant, rather than as *less than* any Construction Phase activity.
 - c) This assumes:
 - i. Continuous working not accounting for supply/logistic issues and bad weather: slight adjustment/ flexibility therefore allowed for in the above durations.
 - ii. That the major replacement(s) activity will occur as a bulk replacement within

a specific localised area of the Scheme (i.e. consolidated activity, disturbance and harm, etc.), rather than say 20% scattered replacement across the entire Site (i.e. fragmented activity, disturbance and harm, etc.). These are two very different scenarios in terms of duration and activity generated and consequently need acknowledgement and address as such within the oOEMP and [APP-162] BSMP.

- d) The assessment and Applicant's statement (and related Management Plans) should also address the very worst-case scenario:
 - i. Worst case scenario: 100% replacement by:
 - Single crew: (19mx5(20%)) 95months = c.8-years continuous replacement activity. While the EA harm identified may be *less than* that of the Construction Phase activity, it represents c.3x duration on that of the construction phase (c. 30months/2.5years): this should be acknowledged by the Applicant as a prolonged industrial activity with related disturbance and harm to the local community.
 - 2No. crew (9.5mx5) = c.4-years.
 - 3No. crew (6.5mx5) = c.2.7-years.
 - ii. i.e. in the worst-case scenario using 3No. crew the replacement activity is the same duration as the stated Construction Phase. This is not (directly) recognised nor addressed by the Applicant.
- e) The Council evidences its concern above in that the durational impact(s) of any major replacement campaign(s) could be significant, and that these are not addressed by the Applicant. In this regard, the Council's request for an identifiable, coherent and legible Replacement Phase Management Plan to address concerns raised above and in the Host Authority's Local Impact Reports should therefore be given more weight in any further discussions on this matter.
- f) [APP-038] para 2.7.5 '*Decommissioning is expected to take between 12 and 24 months and would be undertaken in phases*' – in light of the fact that the number of crews play an absolute role in duration of works, some statement/ clarification regarding duration should be made within the [REP3-054] outline Decommissioning Environmental Management Plan (oDEMP) to evidence that the Decommissioning will occur with the period stated; i.e. '*is expected*' should be changed to '*will*' to make it an absolute commitment (this matter is also raised by the EXAQ2.1.1).

1.2.5 **Observation 1:** at 20% replacement, the single and two-crew options in terms of site activity c/would have a lengthy duration with related local disruption. While recognising that work-resourcing may not be a planning matter, the Council expresses concern regarding the overall duration of activity and asks the Applicant to review their working approach to reduce the duration of the replacement activity (by example stating that in the 20% replacement campaigns they will only use a minimum of three crews, and in the eventuality of more than say 50% replacement, they will only use say a minimum of six crews to in all cases keep the work duration to under 12-months).

1.2.6 **Observation 2:** critical to this calculation is the Applicant's statement that a crew can replace 420panels/ day. The Council strongly suggest that this needs to be evidenced as this is a critical assumption in assessing effect, harm, and mitigation.

1.2.7 **Observation 3:** the Council notes that the Applicant may be able to significantly reduce

HGV activity on the Public Highway, by wherever possible, committing to delivering a full vehicle load (@ 18-tonne) of solar panels etc.; namely (§2.3.16) Vehicle movement (delivery), stated as *'18-tonne/ min 210 panels: 2No. deliveries per day'* to the compound at site D. At 30kg/panel x 210No. = c.6.5-tonnes. Therefore, a commitment to load the vehicle to full capacity could reduce overall HGV movement to potentially one vehicle/day to supply one crew. The Applicant will need to evidence that the movement of new and old PV panels between sites A, B, C and D are to be in vehicles appropriate for the roads and accesses available at the operational phase, and movements minimised by efficient use to loads.

1.2.8 **Observation 4:**

1.2.9 (§2.3.19) *'During replacement campaigns, works would be undertaken using a phased and sequential approach. While more than one crew may be operating at any one time, each crew would progress gradually and systematically through defined panel areas rather than working across the whole Site simultaneously'*.

1.2.10 This approach assumes bulk replacement per sector/ area but does not address the impact and approach if the 20% replacement is fragmented across the entire Site. This would generate more dispersed work activity, and may actually increase vehicle activity across the entire Site and surrounding area to manage the associated logistics. It is suggested that the Applicant assesses accordingly.

1.2.11 **Observation 5:** in light of the fact that the Operational Phase will be 40-years, and during this period circumstances could arise, say *force majeure* or changing technologies that make the Scheme's infrastructure systems less viable/operational or similar, that requires total replacement, the Applicant should assess the impact of 100% replacement to evidence a strategy for the very worst-case scenario and related potential impact/ harm that this may create to ensure and evidence their statement that in all cases harm identified will be *less than* the Construction Phase.

It is noted that the Applicant states in [REP3-075] §2.3.39 *'It is extremely unlikely that the Applicant would replace all battery storage units within the BESS at the same time, or within the same year'*. However unlikely, it would be prudent to have measures and a strategy address in place should such an event occur.

1.2.12 **Observation 6:** the replacement activity will generate the need for staff welfare facilities - it is assumed that these would already be on site within the Operations Building having been delivered in the Construction Phase (Site D). It is assumed that NO satellite facilities, access tracks, and parking will be created for staff during any replacement activity outside those already indicated in [APP-121] Illustrative Environmental Masterplan.

1.2.13 **Observation 7:** (TN§1.1.6) *'where more than 20%'*

1.2.14 There is concern that this trigger value could be viewed as arbitrary and open to challenge; that the Operator could undertake 19.99% replacement and not engage this trigger point; and, that the LPA has no discernible way of enforcing such trigger (unless evidenced solely by the Applicant).

1.2.15 **Further, potential harm as identified by the Applicant (i.e. no *less than* that of the Construction Phase) and a suggested 20% trigger to notify the Council does not of itself identify and address harm that does actually arise due to the replacement works (noise, disruption, temporary stopping up of PRoW, etc.). Therefore, the 20% trigger should not be seen as the trigger, rather, the duration and intensity of disruption to the local**

community and public highways should be viewed as the trigger (as this would have been assessed in the ES). This of itself will be measurable.

- 1.2.16 As noted above, the 20% replacement campaign can be anywhere between c.6 to 19months (subject to crew size used), yet the scale of disruption in terms of duration and perception is quite different in each case to the local community (extending this to 100% replacement over the life of the Scheme, this could be between c. 2.7 to 8-years).
- 1.2.17 There is concern that where the trigger of '*where more than 20%*' is engaged, should the Operator in all cases undertake 19.99% replacement, then there is the potential that the Council is not consulted for the 40-year duration of the Scheme. This should be seen as unreasonable.
- 1.2.18 While the Council recognises that the Operator will want flexibility in both % scale of replacement works and number of work crews instructed, and while the Council is supportive of a trigger, the Council requires a verifiable trigger that enables Council's engagement – a trigger that is measurable in terms of affect as identified (hence enforceable).
- 1.2.19 For planning purposes, the trigger of the replacement campaign needs to relate to the effect(s) assessed in the ES, rather than a maintenance operational figure.
- 1.2.20 It is consequently suggested that:
- a) The trigger for the replacement campaign should relate to:
 - A period/ duration (three-months or more within a 12-month period) where and/or when potential harm may arise; and/or,
 - When more than five BESS units are to be replaced within the duration suggested above; and/or,
 - When staff levels are increased by five (one team) or more for the duration suggested above.
 - Or as to be resolved between Parties during examination.
 - b) The Operator must submit as a minimum the following documentation for the replacement campaign to the Council for written approval, namely:
 - i. Through an agreed suite of document/ evidence (e.g. TN§2.5.6)
 - ii. Operational Construction Traffic Management Plan
 - iii. Operational Environmental Management Plan
 - iv. Waste Management Plan
 - v. Battery Safety Management Plan
 - vi. Public Rights of Way Management Plan
 - vii. Soil Management Plan
 - c) The Operator must notify the Council a minimum of six months prior to commencement of the replacement campaign as to a start date of such works. Such works cannot be undertaken without written approval been secured.
 - d) In this way, the Council can be notified and be engaged. Further, the works and mitigation measures are approved by the Council and are consequently enforceable. It is suggested that the above triggers, notifications, and due processes are reflected in the oOEMP and DCO Agreement.
 - e) Wording to address unreasonable delays outside the original notification can be incorporated to the satisfaction of Parties during examination.
 - f) It is suggested that this approach also apply to the [REP3-054] outline Decommissioning Environmental Management Plan (oDEMP).

- 1.2.21 **Observation 8:** General observation – actions, Applicant’s intent, statements etal should be phrased in the Management Plans as an intent (*will*) rather than as an option (*may*).
- 1.2.22 The Council has undertaken an extensive review of the Technical Note and the various Management Plan – these reviews should be read both in the singular and as a collective review across the suite of inter-related documents.

Technical Note – track changes

- 1.2.23 The Applicant is referred to the track changes made against the Technical Note in so far that the Note gives commitments, clarifies matters, or proposes work methods that have not previously been table in supporting material that needs addressed within any amendments to the Management Plans or similar.

2. CONCLUSIONS

- 2.1 The Council wishes to thank the Applicant for preparing the Technical Note which has assisted their understanding of the Scheme, and specifically in addressing matters raised and clarification sought regarding the replacement campaign works.
- 2.2 In review, it is suggested that the Applicant’s Technical Note sufficiently highlights the concerns identified and raised by the Council in their various submitted evidence regarding the replacement campaign works. It is consequently suggested that this needs address as suggested/ observed above.

PD-QA/8pg end

Appendix A: [REP1-066] Technical Note on Replacement Works – Track Changes



EAST PARK ENERGY

East Park Energy

EN010141

Technical Note on Replacement Works

[REP3-075]; June 2026
BBC/HA Review (July 2026):

Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submit under separate cover for individual procedural sign-off purposes.

This review, as attached to a cover letter, remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification as set out in the review below within any further updated submitted material or similar to the Examination.

The review is submitted without prejudice and the Council reserve the right to comment further as may be necessary.

The reference to 'Council' (singular) should be read interchangeably with the term 'Host Authorities' (plural).

Document Reference: EN010141/DR/8.36

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

May 2026
Version P01

EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Technical Note on Replacement Works

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/8.36
Author:	Axis PED Ltd

Version	Date	Status
P01	May 2026	Deadline 3
<u>HA Review</u>	<u>7 July 2026</u>	

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Appendix A - Proposed Operational Access Strategy Plan

COUNCIL'S OBSERVATIONS:

The Applicant is referred to the Cover Letter: Response to Deadline 4 – review of [REP3-075] Technical Note on Replacement Works (7 July) which sets out the executive observation of the Council's review on this Note.

1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This Technical Note sets out the Applicant's position in relation to replacement activities during the operational phase of the Scheme.
- 1.1.2 The Applicant notes that it is common practice to replace solar farm components periodically throughout the operational lifetime of the development. Parts such as PV panels, inverters, and transformers will degrade over time and may also become outdated as technology advances. Periodic replacement will ensure the Scheme continues to operate safely, efficiently, and in accordance with industry best practice and regulatory requirements, maintaining optimal performance and reliability.
- 1.1.3 Upgrading components allows the Scheme to benefit from technological advances, including higher panel efficiencies, improved inverter performance, and better monitoring and control systems, all of which can maintain or increase overall energy output without expanding the development footprint. This approach maximises the renewable energy generated over the 40 years authorised by the DCO, aligning with national and local policy objectives to deliver efficient, resilient, and low-carbon energy infrastructure throughout the project's lifetime, to meet the long-term challenge that is Net Zero.
- 1.1.4 The Applicant has previously outlined the proposed approach to replacement activities in paragraphs 2.6.6-2.6.9 of ES Vol 1 Chapter 2: The Scheme [REP2-008]. In brief, replacement activities may be required where components fail, reach the end of their operational lifespan, or where technological advances provide increased efficiencies that justify replacement. Such activities would occur periodically over the lifetime of the Scheme and would not require construction works of the same intensity as those undertaken during the main construction phase.
- 1.1.5 Importantly, any replacement campaign, whether for the solar panels or other associated infrastructure, would not require major ground disturbance, the

Commented [PD1]: While the Council is in broad agreement with the statement that the impact, and consequently the assessment/ mitigation of replacement works is NO LESS than that of the construction works, the potential works as provisionally identified in §2.6.5-9 must be transposed into the oOCMP and other Management Plans. Currently this is NOT evident.

construction of new tracks, the laying of foundations, the construction of new below-ground cable runs, or the wholesale erection of new panel supports.

Furthermore, the proposed landscape mitigation, including improved vegetation screening and habitat improvements, would be in place and have matured for circa 15 to 20 years before a replacement campaign is likely to be required. Accordingly, the environmental effects of a replacement campaign would be substantially less than those experienced during the construction phase, with significantly fewer vehicle movements and a much smaller workforce.

Commented [PD2]: Applicant to clearly set out this absolute commitment within the oOCMP Operational Phase and replacement campaign. Applicant to confirm.

1.1.6 The outline Operational Environmental Management Plan (oOEMP) [as updated alongside this submission] sets out the principles, controls and measures to be implemented during the operational phase to avoid and reduce the potential for environmental effects from occurring, including during any replacement campaigns. It is considered that the final OEMP will provide adequate controls in relation to the environmental effects that could arise from replacement works. However, in recognition that replacement campaigns could occur many years into the future and that the environmental baseline, regulations and surrounding development context could evolve during this period, the oOEMP includes a commitment that, where more than 20% of solar panels are to be replaced in any one calendar year (referred to as a major replacement campaign), a notification ~~will~~ **must** be submitted to the LPA for written approval, with details of the management measures proposed to be put in place for those replacement activities, to ensure that such works do not give rise to any materially new or materially different environmental effects compared to those identified in the environmental statement.

Commented [PD3]: oOEMP reviewed under separate cover.

Applicant to review accordingly.

1.1.7 This note sets out the requirement to replace various components of the Scheme and the benefits that would derive from these works. It also examines the potential environmental effects that could arise from a replacement campaign. In particular, the note examines the effects that could arise from the replacement of up to 20% of panels, for which prior notification would not be required. It demonstrates that the controls in place via the oOEMP would

Commented [PD4]: 1. See Council Observation box below.
2. The commitment of submitting notice needs to be reflected in the oOCMP.
3. The statement 'to ensure that such works do not give rise to any materially new or materially different environmental effects compared to those identified in the environmental statement' needs to be reflected in the oOCMP as to how this is monitored and if effect/harm is greater, what is the recourse?
4. General observation - actions et al should be phrased as an intent (will) rather than as an option (may).

Applicant to review accordingly.

be sufficient to ensure that significant environmental effects would not arise,
and, in line with the ES, that the effects from a replacement campaign would
be less than those assessed in relation to the construction phase.

Commented [PD5]: In broad agreement

2.0 REPLACEMENT ACTIVITIES

2.1 Approach

2.1.1 Table 2-35 of **ES Vol 1 Chapter 2: The Scheme [REP1-008]** sets out the indicative operational lifespan of the Scheme's components and, in doing so, identifies the range of replacement activities expected over the life of the **Scheme**.

2.1.2 In practice, maintenance scheduling would mean it is highly unlikely that all components would be replaced in one campaign. However, even in the event that this were to occur, the level of impact would remain lower than that experienced during the construction phase. This is primarily because there would be no requirement to construct new tracks and accesses, or for ground disturbance. Consequently, the workforce required would be significantly less than the construction phase, as would the number of vehicle **movements**.

Commented [PD6]: To a certain extent the Applicant accepts that the lifespans are academic as solar farm technology is subject to continual change (2.3.36; 2.3.47; etc). Consequently this is unmeasurable in planning terms and consequently any harm identified (less than Construction Phase) is similarly potentially unknown. It is consequently suggested that the trigger point is redefined as suggested (Council Observation 7) to identify harm and LPA engagement.

Commented [PD7]: This is set out as a comment; it should be made a commitment.

2.2 Site Operations

2.2.1 The Applicant has planned for the operational phase of the Scheme, identifying an 'Operations and Maintenance **BuildingArea**' in Site D (**[APP121]** **Figure 2-1k)** ~~comprising which includes~~ a storage, operations and maintenance building ~~and heavy duty access track~~. The purpose of this ~~building area~~ is the storage of site management and maintenance equipment, which will include plant and machinery not only for maintaining the infrastructure components of the Scheme, but also for maintaining the extensive habitat and landscape **proposals**.

2.2.2 The operational access to the Operations and Maintenance Area will use the main site access from the B645 (identified as SA16 on **ES Vol 3 Figure 2-4d [APP-124]**). All deliveries to Site during the operational phase would in the first instance be to the Operations and Maintenance **buildingArea**, where plant, equipment and machinery would typically be unloaded to the storage, operations and maintenance building and held ready for distribution elsewhere within the Site, as required.

Commented [PD8]: There does not appear to be any hardstanding for external storage and/or planting nursery. If this is required then it may need screening/ close-board fencing/ similar.

Applicant to review accordingly.

2.2.3 For routine maintenance operations, including replacement campaigns, there would not be a requirement for the construction satellite compounds used during the construction phase. These satellite construction compounds would have been removed at the end of the construction phase and would not be re-established until the decommissioning phase.

2.2.32.2.4 ~~Instead,~~ the laydown area for components would be between the rows of panels or for other equipment existing hardstanding areas limited to the Operations and Maintenance building.

2.3 Components

2.3.1 This section sets out the approach to replacement activities for each of the Scheme components identified in Table 2-35 of **ES Vol 1 Chapter 2: The Scheme [REP2-008]**, and listed below in **Table 1** of this technical note:

Table 1: Indicative Operational Lifespan of Scheme Components

Scheme Component	Indicative Operational Lifespan
Solar Panels	20 – 40 years (a single replacement per installed panel and 10% contingency is assumed)
Mounting Structures	40 years
String Inverter	20 years
Centralised Inverter	20 years
Solar Transformer	20 – 40 years
Battery Storage Unit	20 years
Battery Transformer	20 – 40 years
Auxiliary Transformer	20 – 40 years
400 kV / 33kV Transformers	40 years

Commented [PD9]: Yet in the oOCMP temporary, satellite facilities will be placed where required to aid the replacement campaign teams.

Applicant to review accordingly.

Commented [PD10]: Elsewhere the Applicant notes that for solar panel delivery they would ONLY bring to site what they could install per day. It is unclear if this is Site or areas within the Site. There is therefore concern, that to optimise logistics, the O&M Building area may become a 'builder's merchant yard' of equipment/ infrastructure parts open to view. This needs to be expressly excluded as this has not been assessed within the ES.

Applicant to review accordingly.

Scheme Component	Indicative Operational Lifespan
Cabling	40 years (20% replacement anticipated due to defects)
Fencing	10 – 20 years
CCTV	10 – 20 years

Commented [PD11]: This needs to be acknowledged in the oCEMP, oCTMP, and oSMP as it may require vehicle access activity off the Heavy Duty Access tracks and Access Tracks; involve churn of soil; other.

Applicant to review accordingly.

2.3.2 The approach to replacement of each of the above components is set out under a series of sub-headings below.

Solar Panels

2.3.3 Over a 40-year operational phase it is reasonable to assume that the Applicant may need, or may choose, to replace some or all of the solar photovoltaic modules. This does not necessarily imply premature failure, rather, replacement works are a normal and foreseeable aspect of managing long-life generating assets.

2.3.4 Solar panels are designed to operate over extended periods, but their output gradually reduces over time through normal module degradation. Solar panel technology is also advancing rapidly, and it is now possible to obtain solar panels with power output warranties extending to 30 years or more. However, even where modules remain functional, their generation efficiency may reduce below the level anticipated by the Applicant for optimal operation of the Scheme. Over a 40-year period, it may therefore be appropriate to replace older modules with newer panels to maintain electricity generation, improve the efficiency of the installed infrastructure, and make best use of the grid connection.

2.3.5 Replacement may also be driven by technological improvement as solar module technology continues to develop, with newer panels typically offering improved efficiency, higher output per panel, better degradation performance, enhanced durability, and improved safety or monitoring characteristics. There

may also be practical reasons for replacement works if individual panels or strings of panels are damaged by weather events, accidental impact, electrical faults, manufacturing defects, or other operational issues. In such cases, replacement would be required as part of routine repair and maintenance. ~~Large~~Major replacement campaigns may also be undertaken where a particular panel model becomes obsolete, where spare parts are no longer readily available, where compatibility with inverters or monitoring systems becomes an issue, or where replacement of a wider group of panels is more efficient than repeated piecemeal interventions.

- 2.3.6 The need for replacement works should therefore be understood as an inherent feature of a long-duration solar development. The ability to replace panels during the operational phase helps to ensure that the Scheme remains safe, efficient and capable of delivering renewable electricity throughout its consented life.
- 2.3.7 The Applicant has assumed that every solar panel installed as part of the Scheme would be replaced once during the operational phase, with a further contingency of 10% to allow for occasions where more than one replacement is necessary. The Applicant considers this to represent a reasonable lifetime assumption, and it should not be taken to mean that all panels are expected to require replacement at the same time, or within a single replacement campaign.
- 2.3.8 There is unlikely to be a single technical or commercial trigger requiring all panels to be replaced at the same point in time. Panel degradation occurs gradually and may vary across the Site depending on age, manufacturer batch, orientation, shading, electrical configuration, weather exposure and operational history. Some panels may continue to perform satisfactorily beyond the point at which others are damaged, underperforming or obsolete. Similarly, individual panels, strings or blocks may require replacement due to faults or damage, while other parts of the Site may remain fully functional. This means that a targeted or rolling programme of replacement is more likely

and more proportionate than wholesale replacement across the whole Scheme.

2.3.9 The Applicant considers it unlikely that more than 20% of the solar panels would need replacing within any single 12-month period. The replacement of 20% of the panels within a 12-month period has therefore been identified as a conservative marker for a major panel replacement campaign, rather than routine maintenance. As set out in paragraph 2.4.10 of the oOEMP [as updated alongside this submission], in the unlikely event of a major replacement campaign involving the replacement of more than 20% of the solar panels within any 12-month period, this would 'trigger' a requirement to notify the relevant LPAs, referred to as a major replacement campaign. This ensures that any major panel replacement campaign would be subject to appropriate prior notification and where necessary the adoption of additional management controls to ensure that such works do not give rise to any materially new or materially different environmental effects compared to those identified in the environmental statement, while recognising that smaller-scale replacement works would form part of normal operational maintenance controlled by the final OEMP.

Commented [PD12]: Helpful in defining 'Major replacement campaign'. See Council's observations.

2.3.10 Under normal annual / routine operational maintenance, panel replacement would be expected to occur in much smaller quantities than a major replacement campaign scenario described above. In those circumstances, replacement panels would not need to be delivered or distributed in bulk. Instead, panels would ordinarily be moved from the storage, operations and maintenance building to the relevant work area using a van or similar light vehicle, with the redundant panels returned to the Operations and Maintenance buildingArea for onward management in accordance with the outline Waste Management Plan [APP-164].

2.3.11 The scale of any major panel replacement campaign would depend on the number of panels to be replaced and dictate the number of crews deployed. The on-site workforce would comprise crews working collectively on defined panel areas. A typical crew would comprise up to five operatives, including:

- three panel technicians to unbolt the removed panels and position and fix the replacement panels,
- one handling or telehandler operator to bring pallets to the working zone and remove the replaced panels, and
- one quality or electrical engineer to verify connectors, torque settings and string continuity.

2.3.12 Each crew would be expected to handle approximately 420 panels per day. The illustrative design shown on **ES Vol 3 Figure 2-1 Illustrative Environmental Masterplan [APP-121]** includes approximately 695,760 panels across Sites A to D. **Table 2** therefore identifies the indicative duration of replacement works based on different crew numbers, assuming a productivity rate of 420 panels per crew per day and a five-day working week. A maximum of five crews would be deployed.

Commented [PD13]: This critical statement needs some evidence.

Table 2: Time to replace 20% of panels based on size of workforce

No. of Crews	Time to replace 20% of total panels
5 crews (25 people)	63 working days / 13 weeks / <u>3.25 months</u>
4 crews (20 people)	83 working days / 17 weeks / <u>etc</u>
3 crews (15 people)	111 working days / 23 weeks
2 crews (10 people)	166 working days / 34 weeks
1 crew (5 people)	332 working days / 67 weeks

Commented [PD14]: Months is a more 'measurable' duration for local communities.

2.3.13 The total on-site workforce could be scaled up or down depending on the objectives of the specific maintenance activity or replacement campaign. However, for a major/larger replacement campaign it is expected that there would typically be between two and five crews on Site. On that basis, the

replacement of 20% of the total panels is reasonably expected to take approximately 13 to 34 weeks, assuming a five-day working week. This demonstrates that a 20% panel replacement campaign would be substantially smaller in scale, duration and intensity than the main construction phase.

- 2.3.14 As noted in Section 1.0, the significant reduction in time, workforce and activity compared with the main construction phase arises because the principal site infrastructure would already be in place. Replacement works would not require the construction of new ~~Siteinternal~~ heavy-duty access tracks and access tracks, new accesses, new panel support foundations, or the original setting out and installation works associated with the construction phase. The works would instead involve the removal and replacement of panels within an already operational solar farm.
- 2.3.15 Replacement panels would be delivered to the ~~storage~~, Operations and Maintenance building in Site D using standard 16.5m articulated lorries. Panels would then be distributed onwards through the Site to meet the requirements of crews working within specific panel replacement areas.
- 2.3.16 From Site D, pallets of panels would be loaded onto an 18-tonne rigid curtain-sided vehicle for onward distribution to the relevant work areas. An 18-tonne vehicle would be capable of transporting a minimum of 210 panels, such that each crew operating around the Site would require approximately two such deliveries per day. This would allow replacement panels to be delivered to work areas on a phased basis, rather than requiring panels to be stored across the wider Site in advance of the works.
- 2.3.17 Vehicles returning to Site D from the work areas would be loaded with pallets of redundant panels. These would be deposited ~~within~~ the ~~storage~~, operations and maintenance building before being transferred from the Site in accordance with the oWMP [APP-164].
- 2.3.18 At the work areas, pallets of panels would be laid down temporarily, but no longer than.... on existing stoned access tracks where appropriate or between panel rows. Should ground conditions require it, temporary ground protection

Commented [PD15]: OK. We need clarity if the O&M Building is/ is not going to be a major external storage yard. Visual impact in ES?

matting would be deployed along access routes and laydown areas to prevent soil compaction and damage to grassed surfaces. All temporary ground protection matting would be removed following completion of the relevant works.

2.3.19 During the major replacement campaigns, works would be undertaken using a phased and sequential approach. While more than one crew may be operating at any one time, each crew would progress gradually and systematically through defined panel areas rather than working across the whole Site simultaneously. This would be a more efficient work process and would also limit the spatial extent of activity at any one time.

Commented [PD16]: It would assist if this were termed 'sub-Site areas' across this document.

2.3.20 This approach ensures that the area of activity remains localised, with disturbance confined to a limited part of the Site at any given time. As crews complete works in one area, they would move on to the next, allowing previously affected areas to be reinstated and reducing the overall extent and duration of disturbance at any one time. As a result, major even a larger panel replacement campaign would remain materially less intensive than the main construction phase and would be capable of being managed through the operational controls set out within the oOEMP [as updated alongside this submission].

Commented [PD17]: But this assumes batch failure and replacement of total sub-site areas; (secondary) approach also needs to address isolated panel replacement across the entire Site within oCEMP.

Applicant to review accordingly.

Mounting Structures

2.3.21 The mounting structures are relatively simple metal frames structures that would not be expected to require replacement over the 40-year operational phase during normal operation of the Scheme.

2.3.22 The Applicant has therefore assumed within the ES that the mounting structures would not require any notable major replacement works during the operational phase.

String Inverters

- 2.3.23 String inverters may need to be replaced during the operational phase because they are active electrical components that contain power electronics, circuit boards, capacitors, cooling systems, relays, sensors and communications equipment. These components are subject to electrical loading, thermal cycling, weather exposure and general wear over time. It has therefore been assumed and assessed within the ES that is therefore reasonable to assume that all string inverters will be replaced at some point during the operational phase.
- 2.3.24 Replacement works would usually be targeted and modular, because string inverters are distributed across the Site and associated with particular strings or groups of panels. This means that individual units or defined areas can be isolated and replaced without requiring the whole solar farm to be taken out of operation with limited, managed impact?.
- 2.3.25 String inverters would be delivered and stored within the ~~Storage~~, Operations and Maintenance Building as required and then distributed to the relevant work area across the Site in vans on the Site's access tracks. String inverters are relatively modest in size (refer to **ES Vol 3 Figure 2-2a [APP-122]**) and therefore multiple inverters could be loaded into a single van for distribution around the Site. Given that these replacements would involve vans and a low number of vehicle movements (even if all string inverters were to be replaced in a single year, which is extremely unlikely) the Applicant does not consider it necessary to set a 'trigger' on the number of string inverters that could be replaced, as has been done in relation to the solar panels.
- 2.3.26 As set out in paragraphs 2.4.24-32 of **ES Vol 1 Chapter 2 [REP2-008]**, it should be noted that where string inverters are utilised, centralised inverters (covered below) would not be required. Conversely, in the scenario where centralised inverters are utilised, the string inverters would not be required.

Centralised Inverters

- 2.3.27 As with the string inverters above, ~~. It has therefore been assumed and assessed within the ES that it is reasonable to assume that~~ all centralised inverters would be replaced at some point during the operational phase.
- 2.3.28 The centralised inverters would be delivered ~~and stored within~~ the Operations and Maintenance ~~building~~Area where they would be temporarily held before being moved on to the relevant work area in the Site (typically on the same day). The centralised inverters would be transferred around the Site by low loader HGVs (not abnormal loads) ~~on the Site's access tracks~~ where they would be unloaded by a small crane. There would be an estimated total of 52 no. centralised inverters distributed around the Site, based on the illustrative layout shown on **ES Vol 3 Figure 2-1 [APP-121]**. The centralised inverters are likely to be replaced in a staggered campaign and delivered on a just-in-time basis for on-site installation, resulting in a negligible number of traffic movements on the road network at any one point in time.
- 2.3.29 The replacement of inverters would not happen as a ~~large-scale~~major single replacement event.~~Therefore,~~ deliveries would be spread over a longer period on a demand basis, resulting in a negligible number of traffic movements on the road network at any one point in time. Given that these replacements would involve a low number of vehicle movements the Applicant does not consider it necessary to set a 'trigger' on the number of centralised inverters that could be replaced,~~as has been done in relation to the solar panels.~~
- 2.3.30 Centralised inverters would not be stored on Site and would need to be ordered in from specialist suppliers; the works to replace these components would therefore be scheduled in advance to tie-in with delivery of the component. The Applicant has reviewed the **oOEMP [as updated alongside this submission]** and provided an additional commitment at Table 5.5 to notify the relevant local highway authorities in advance with details of any necessary traffic management measures ahead of work to replace this

component, given that larger HGVs would be required to make the deliveries on the public highways (-as assessed within the ES) and Site's access tracks across the Site.

Solar Transformers

- 2.3.31 The solar transformers would typically comprise a transformer and associated electrical equipment, protection systems, switchgear, metering, monitoring, cooling or ventilation components, cabling connections and containment. These elements are exposed to electrical loading, thermal cycling, environmental conditions, and routine operational wear over time. Over the 40 year operational phase, it has therefore been assumed and assessed within the ES that ~~it is therefore reasonable to assume that~~ some or all of the units may require replacement, either because they have reached the end of their practical service life or because individual components have failed or degraded.
- 2.3.32 Replacement works would usually be targeted and modular, because solar transformers would be distributed across the Site and associated with particular groups of solar panels. This means that individual units or defined areas can be isolated and replaced ~~without requiring the whole solar farm to be taken out of operation.~~
- 2.3.33 The solar transformers would first arrive at the Operations and Maintenance buildingArea, where they would be temporarily held before being moved to the relevant work area in the Site (typically on the same day). The solar transformers would be transferred around the Site by low loader HGVs (not abnormal loads) where they would be unloaded by a small crane.
- 2.3.34 There would be an estimated total of 52 no. solar transformers distributed around the Site, based on the illustrative layout shown on **ES Vol 3 Figure 2-1 [APP-121]**. The transformers are likely to be replaced in a staggered campaign and delivered on a just-in-time basis for on-site installation, resulting in a negligible number of traffic movements on the road network at any one point in time. Given that the replacement of transformers would not

happen on a large-scale single replacement event, deliveries would be spread over a longer period on a demand basis, resulting in a negligible number of traffic movements on the road network at any one point in time. As such, the Applicant does not consider it necessary to set a 'trigger' on the number of centralised inverters that could be replaced, ~~as has been done in relation to the solar panels.~~

- 2.3.35 Solar transformers would not be stored on Site and would need to be ordered in from specialist suppliers; the works to replace these components would therefore be scheduled in advance to tie-in with delivery of the component. The Applicant has reviewed the ~~oOEMP~~ **[as updated alongside this submission]** and provided an additional commitment at Table 5.5 to notify the relevant local highway authorities in advance with details of any necessary traffic management measures ahead of work to replace this component, given that larger HGVs would be required to make the deliveries on the public highways (as assessed within the ES) and Site's access tracks across the Site.

Battery Storage Units

- 2.3.36 The battery storage units may need to be replaced during the operational phase because battery systems are active electrochemical and electrical assets that are subject to degradation through normal use. Battery performance naturally changes over time with the usable storage capacity of a battery typically reducing through repeated charge and discharge cycles. Even where a battery remains safe and functional, its ability to store and discharge electricity may decline below the level required for efficient operation of the Scheme. Replacement may therefore be necessary to maintain the intended storage capacity, response capability and operational flexibility of the battery energy storage system.
- 2.3.37 Over time, individual modules, racks or containers could also become unreliable, suffer faults, or require replacement following damage or abnormal operation. In addition, fire safety expectations, grid compliance requirements,

communications protocols, and manufacturer support arrangements may evolve during the operational life of the Scheme.

2.3.38 There may also be a technological and commercial driver for replacement as battery technology continues to develop, with improvements in energy density, cycle life, safety systems, monitoring capability and operational efficiency. Over a long operational period, the original battery units may become obsolete or less economic to maintain, particularly where spare parts, software support or compatible replacement modules are no longer readily available. In those circumstances, replacing units may be more efficient and reliable than continuing to maintain older equipment.

2.3.39 Replacement works would not necessarily involve the whole battery energy storage system being replaced at once. Battery systems are typically modular, with individual containers, cabinets, racks or units capable of being isolated, removed and replaced in a managed way. This allows replacement to be undertaken as part of a rolling programme, targeted to particular units where capacity, reliability or safety requirements justify intervention. It is extremely unlikely that the Applicant would replace all battery storage units within the BESS at the same time, or within the same year, because the system is inherently modular and can be maintained, isolated and renewed on a unit-by-unit basis.

2.3.40 ~~The Applicant has assumed it has therefore been assumed and assessed within the ES that~~ that all battery storage units would be replaced as a minimum once during the operational phase of the Scheme.

2.3.41 The Applicant has sited the BESS in Site D adjacent to the East Park Substation, and the Operations and Maintenance ~~buildingArea~~; access for works to replace battery storage units ~~is therefore relatively straightforward~~ requiring ~~only~~ the use of the B645 from the A1 to the main site access into Site D. If a battery storage unit container was to be replaced as a 'whole unit replacement' then this would be brought in on a low loader HGV (not abnormal

Commented [PD18]: However, in the worst case scenario the oBSMP should address the impact of 100% replacement.

Applicant to carry across to BSMP and review accordingly.

load) on the public highways (as assessed within the ES) and Site's heavy-duty access track where they would be unloaded by a small crane.

- 2.3.42 There would be an estimated total of 96 no. battery storage units, based on the illustrative layout shown on **ES Vol 3 Figure 2-1 [APP-121]**. In total there would ~~therefore~~ be a low number of vehicle movements required to replace these components across the operational phase. Given that these replacements would involve a low number of vehicle movements (even if all battery storage units were to be replaced in a single year, which is extremely unlikely), and the nature of the highway network required to access Site D, the Applicant does not consider it necessary to set a 'trigger' on the number of battery storage units that could be replaced, ~~as has been done in relation to the solar panels.~~

Commented [PD19]: Has this impact been assessed in the ES Traffic Study?

Battery Transformers

- 2.3.43 The battery transformers would typically comprise a transformer and associated electrical equipment, protection systems, switchgear, metering, monitoring, cooling or ventilation components, cabling connections and containment. These elements are exposed to electrical loading, thermal cycling, environmental conditions, and routine operational wear over time. Over the 40-year operational phase, it has therefore been assumed and assessed within the ES that it is therefore reasonable to assume that some or all of the units may require replacement, either because they have reached the end of their practical service life or because individual components have failed or degraded.
- 2.3.44 The Applicant has sited the BESS in Site D adjacent to the East Park Substation, and the Operations and Maintenance buildingArea; access for works to replace battery transformers is therefore relatively straightforward requiring only the use of the B645 from the A1 to the main site access into Site D. A battery transformer would be brought in on a low loader HGV (not abnormal load) where they would be unloaded by a small crane.

Commented [PD20]: Suggested changes as above

2.3.45 There would be an estimated total of 96 no. battery transformers, based on the illustrative layout shown on **ES Vol 3 Figure 2-1 [APP-121]**. In total there would therefore be a low number of vehicle movements required to replace these components across the operational phase. Given that these replacements would involve a low number of vehicle movements (even if all battery transformers were to be replaced in a single year, which is extremely unlikely), and the nature of the highway network required to access Site D, the Applicant does not consider it necessary to set a 'trigger' on the number of battery storage units that could be replaced, ~~as has been done in relation to the solar panels.~~

Auxiliary Transformer

Commented [PD21]: Changes as above

2.3.46 The auxiliary transformer is a comparatively small component serving the on-site infrastructure and is not subject to the same sustained electrical loading, cycling, thermal stress or operational intensity as the main solar or BESS transformer units. Whilst replacement could be required in the event of a fault, damage, safety issue or change in auxiliary load requirements, it would not ordinarily be expected as a routine or repeated activity across the operational life of the Scheme. In most cases, inspection, testing, protection maintenance and targeted component repairs would be sufficient to maintain the auxiliary transformer in service. A replacement auxiliary transformer could be provided in a single vehicle delivery, and therefore, the Applicant does not consider it necessary to set a 'trigger' on replacement, as has been done in relation to the solar panels.

33kV / 400kV Transformers

Commented [PD22]: Changes as above

2.3.47 It is unlikely that the 33 kV / 400 kV transformers would need to be replaced during the operational phase as these components are engineered for long-term operation. The Applicant would seek to maintain, refurbish or repair the transformer where practicable, rather than replace it outright. Replacement could be required in exceptional circumstances, such as major fault, fire, insulation failure, irreparable damage, material change in grid requirements

or end-of-life condition, but it would not ordinarily be expected as a repeated or planned replacement activity within the operational phase of the Scheme.

- 2.3.48 The Applicant has assumed that the 33 kV / 400 kV transformers would not require any outright replacement during the operational phase.

Cabling

Commented [PD23]: Changes as above

- 2.3.49 The cabling would be expected to last the lifetime of the Scheme and would not require routine replacement unless a specific defect, fault or damage was to occur. Any replacement need is likely to be localised and targeted, rather than site wide. For example, a section of cable may require repair or replacement if it is damaged by third-party works, affected by a manufacturing or installation defect, subject to water ingress at a joint, or identified through testing as underperforming. In those circumstances, the Applicant would isolate and repair the affected section, or replace a defined length of cable, rather than undertake wholesale replacement across the Scheme.

- 2.3.50 Inter-panel cabling largely runs above ground attached to panels and enters conduits at row ends and so replacement works for such cables is non-intrusive.

- 2.3.51 Where cables are buried below ground, they would typically be ducted such that any defective cables could be 'pulled out' and replaced by new cabling without significant excavation. As a result, there is unlikely to be any significant requirement for excavation once the Scheme is installed and commissioned.

Commented [PD24]: However, excavation if required should be addressed within the oSMP

- 2.3.52 Any works to replace cabling would be undertaken by a small team, with cabling distributed to work areas around the Site by vans. Accordingly, the Applicant does not consider it necessary to set a 'trigger' on replacement, ~~as has been done in relation to the solar panels.~~

Fencing

- 2.3.53 Subject to appropriate specification, installation and routine maintenance, the fencing would be expected to remain serviceable for ~~an extended~~the period ~~set out in Table 1~~of time. During operation, the fencing would be inspected and maintained as part of normal site management. This may include repairing or replacing isolated sections where damage has occurred, tightening or replacing fixings, maintaining gates and access controls, addressing localised corrosion, or reinstating sections affected by accidental impact, vandalism, weather events or vegetation pressure. Such works would be localised and responsive to condition, rather than forming part of a ~~planned~~major replacement campaign.
- 2.3.54 Any fencing parts would be delivered to the ~~Storage,~~ Operations and Maintenance Building in Site D before being distributed on to the relevant work area in the Site in a van or similar. Accordingly, the Applicant does not consider it necessary to set a 'trigger' on replacement, ~~as has been done in relation to the solar panels.~~

CCTV

- 2.3.55 During operation, the CCTV system would be inspected and maintained as part of normal site security management. Although individual cameras, poles, control equipment, and cabling could require renewal over time, the system would be made up of discrete and replaceable components. It would therefore be capable of being maintained, upgraded and renewed in parts, rather than requiring wholesale replacement.
- 2.3.56 Any CCTV parts would be delivered to the ~~Storage,~~ Operations and Maintenance Building in Site D before being distributed on to the relevant work area in the Site in a van or similar. Accordingly, the Applicant does not consider it necessary to set a 'trigger' on replacement, ~~as has been done in relation to the solar panels.~~

2.4 Access

- 2.4.1 The Operations and Maintenance buildingArea in Site D would be used as the primary hub during the operational phase, including for the storage of components, staff welfare, and parking.
- 2.4.2 Site D would continue to be accessed from the A1 via the B645, using the main site heavy-duty access track (identified as SA16 on **ES Vol 3 Figure 2-4d [APP-124]**). Any replacement works in Site D would utilise this same access.
- 2.4.3 During the operational phase, Site C would be accessed from Site D using the B645 and then Moor Road to access SA13 on **ES Vol 3 Figure 2-4d [APP-124]**.
- 2.4.4 During the operational phase, for HGVs, Site B would be accessed from Site D using the B645 and then Moor Road to access SA13 on **ES Vol 3 Figure 2-4d [APP-124]**, traffic would then pass through Site C to join Great Staughton Road at access SA12, before continuing towards accesses SA03-SA10. For non-HGV traffic, Site B would be accessed from Site D using the B645 through Great Staughton, and then onto Great Staughton Road towards accesses SA03-SA10.
- 2.4.5 During the operational phase, for HGVs, Site A would be accessed from Site D using the B645 and then Moor Road to access SA13 on **ES Vol 3 Figure 2-4d [APP-124]**, traffic would then pass through Site C to join Great Staughton Road at access SA12, before continuing along Great Staughton Road and Little Staughton Road to the B660, where vehicles would turn southbound towards accesses SA01 and SA02. For non-HGV traffic, Site A would be accessed from Site D using the B645 through Great Staughton, and then onto Great Staughton Road towards Little Staughton Road to the B660, where vehicles would turn southbound towards accesses SA01 and SA02.
- 2.4.6 Once operational phase traffic is within the respective parts of the Site, vehicles would utilise the internal Site access tracks created during the

construction phase. There would be no requirement for new access tracks, or for any vegetation clearance to facilitate access within and around the Site.

- 2.4.7 The operational access routing is set out on **Figure 1** attached to this technical **note**.

Commented [PD25]: This Figure needs some way of being bound into the DCO Agreement.

2.5 Mitigation and Control Measures

- 2.5.1 Replacement activities during the operational phase would be managed through the framework of controls secured by the final Operational Environmental Management Plan (OEMP). The final OEMP will be submitted to and approved in writing by the relevant LPA prior to the date of final commissioning for the relevant phase ??? of the Scheme and would be in substantial accordance with the **oOEMP [as updated alongside this submission]**. The oOEMP sets out the principles, controls and measures to be implemented during the operational phase to avoid and reduce the potential for significant environmental effects from occurring, including during operational maintenance, repair and replacement activities.
- 2.5.2 The **oOEMP [as updated alongside this submission]** includes a suite of site-wide controls relevant to replacement activities and campaign. These include controls relating to working hours, site security, protection of the public, public rights of way, deliveries and collections, health and safety, contamination and pollution prevention, welfare provision, lighting, waste management, surface water management, flood risk, liaison with the public, monitoring, ecology, heritage, air quality, noise and record keeping. In addition, the final OEMP will operate alongside other secured management plans where relevant, including the final Landscape and Ecological Management Plan (LEMP), Public Right of Way Management Plan (PRoWMP), Surface Water Management Plan (SWMP), Soil Management Plan (SMP), Waste Management Plan (WMP) and Battery Safety Management Plan (BSMP). Accordingly, replacement activities would not take place in an uncontrolled manner but would be undertaken within the operational management framework secured by the DCO.

- 2.5.3 The scale of replacement activity is expected to vary over the operational life of the Scheme. Routine inspection, maintenance and small-scale replacement would be managed through the standing controls in the OEMP. Such works would generally be limited, localised and low intensity, and would ordinarily involve a small workforce, light vehicles and the use of the existing operations and maintenance infrastructure.
- 2.5.4 For ~~larger-major~~ replacement campaigns, the Applicant recognises that such activity may take place many years after construction, and that the environmental baseline, regulatory standards and surrounding development context may have changed by that time. It would not therefore be proportionate or reliable to prescribe detailed method statements for ~~every~~ potential future replacement campaign at this stage. Instead, the appropriate approach is to secure the operational management principles through the OEMP and to require additional details to be provided where a replacement campaign reaches a trigger scale that ~~will may~~ require more specific management measures and LPA approvals.
- 2.5.5 The ~~o~~OEMP [as updated alongside this submission] therefore includes an additional notification mechanism for the component most likely to give rise to environmental effects as a result of a major replacement campaign, namely the solar panels. Prior to any replacement activity involving the replacement of more than 20% of the solar panels within the Scheme within any 12-month period, a notification must be submitted to the relevant LPA for approval. This threshold has been identified as a conservative marker for a major solar panel replacement campaign, rather than routine maintenance. It reflects the substantially greater number of individual solar panels across the Scheme, and the potential for a major panel replacement campaign to generate workforce, vehicle movement, and waste considerations when compared with other operational components.
- 2.5.6 The notification would identify, insofar as relevant to the replacement activity proposed, the nature and scale of the works, the components to be replaced, the parts of the Site affected, the anticipated timing and duration of the works,

Commented [PD26]: As reviewed elsewhere

the proposed phasing, working hours, workforce, plant and equipment, vehicle movements, HGV routing, access arrangements, temporary laydown or storage areas, welfare arrangements, waste management arrangements, and any measures required to manage effects on public rights of way, ecology, soils, drainage, noise, air quality, lighting, landscape and visual amenity, and local residents. The notification would also identify any pre-works surveys, environmental checks, stakeholder liaison, community communication, monitoring or reporting proposed for the relevant replacement activity. The method statement submitted with the notification will include details of any other replacement or maintenance works anticipated during the period of panel replacement to ensure that the cumulative effects of all replacement and maintenance works are considered.

Commented [PD27]: This checklist is strongly supported and should form an Appendix template of requirements to the oOEMP

- 2.5.7 The management measures submitted with the notification would need to be consistent with the principles of the approved CEMP, CTMP, PRoWMP and OEMP, but would also need to be proportionate to the scale, duration and location of the replacement activity proposed. This ensures that any major solar panel replacement campaign (over 20%) would be subject to further approval at the appropriate time, having regard to the prevailing baseline and any relevant operational experience from the Scheme, while avoiding the unnecessary submission of detailed management plans for routine maintenance and smaller-scale replacement works.

- 2.5.8 Equivalent percentage-based triggers are not considered necessary for any of the other Scheme components. This is because those components are materially fewer in number, are generally modular or discrete in nature, and would generate substantially fewer vehicle movements and a smaller workforce requirement, even in the very unlikely event that all such components required replacement within a single year. Replacement of inverters, transformers, BESS units, cabling, fencing and CCTV would still be controlled through the measures set out in the final OEMP and, where relevant, the other approved operational management plans. Where replacement of larger electrical plant requires HGVs, low loaders, cranes or

Commented [PD28]: In all infrastructure cases see Council Observation 7 regarding trigger.

traffic management, those movements would be managed through the approved operational access arrangements and the controls in the OEMP, with advance notification to the relevant highway authority where relevant.

- 2.5.9 This approach provides a proportionate and enforceable control framework. Routine maintenance and smaller-scale replacement activities would be managed through the final OEMP and associated management plans, while a major solar panel replacement campaign would require an additional notification to, and approval by, the relevant LPA before the relevant works proceed. On that basis, the Applicant considers that the mitigation and control measures secured through the DCO and the oOEMP [as updated alongside this submission] are sufficient to ensure that replacement activities would not give rise to likely significant effects beyond those assessed in the ES.

Commented [PD29]: In all cases see Council Observations

3.0 ENVIRONMENTAL IMPACTS AND EFFECTS

3.1 Introduction

3.1.1 As set out in Section 2.0 above, the replacement of panels or existing equipment would not necessitate an extension of the Order Limits, an increase in permanent land take, an extension of the operational period, or an expansion of the generating station beyond the parameters that are assessed in the Environmental Statement (ES). All replacement activities would be undertaken within the assessed design envelope and controlled through the relevant operational management plans. Furthermore, the baseline for any assessment of a replacement is the scheme as built and operational, not the original pre-construction agricultural baseline. Accordingly, the main consideration for a replacement campaign is not what the effects of a new solar farm are on the site. Rather, what additional temporary effects would arise from a replacement exercise within an already operational solar farm with an established set of management plans and mitigation measures in place.

3.1.2 The Scheme would be fully operational at the time of any replacement campaign and based upon the manufacturers guarantees for solar panels and other associated equipment, this is unlikely to occur as suggested in Table 1 until at least 15-20 years into the operational phase. As such, it would most likely occur at a point where the landscape screening has matured, solar development is an established land use, the drainage regime is in place and fully functioning, site access arrangements are established, on-site access tracks are built and being maintained, and any habitat management regimes are ~~also~~ well established. Hence, the environmental effects from the replacement works are likely to be of lower magnitude than those assessed during the construction phase, as the mitigation measures put in place to mitigate the operational effects will also help reduce the magnitude of the effects associated with the replacement works.

Commented [PD30]: Support this statement on the basis that the Council recognises the changed Site condition and that the Applicant recognises that the replacement activity/ campaign creates 'temporary effect' some of which will need address.

3.1.3 The principal effects of any replacement campaign as assessed in the ES would be temporary and typically construction-like in nature and could result from additional traffic, noise, temporary visual effects, the management of waste, ecological disturbance, ground and soil disturbance and pollution prevention. However, as set out in Section 2.0 above, they would be materially less than the effects / extent of work that are expected in the main construction phase particularly as effects would be short term, limited in their geographical scope, much less operationally significant than the original construction phase, and controlled by various operational phase management plans

3.1.4 Notwithstanding the above, in recognition of the concerns that have been raised during the examination process, the Applicant has elected to give further consideration / clarity as to the nature and magnitude of the environmental effects arising from a replacement campaign, and the adequacy of the mitigation that has been identified within the oOEMP [as updated alongside this submission]. In doing so, the following sections take into account the description of replacement activities in Section 2.0 above, the assessment outcomes / planned mitigation measures set out within the ES, the operational site baseline and the operational phase provisions proposed in the management plans. For ease and clarity, the response follows the same environmental topic-based chapter headings as Vol 1 of the ES.

3.2 Landscape and Visual

Commented [PD31]: No comment to make

3.2.1 After an extended period of operation (circa 15-20 years), the planting and habitats proposed in the **outline Landscape and Ecology Management Plan (oLEMP) [REP2-032]** will have matured and will remain actively maintained, providing more effective visual filtering than the landscape features present during the initial construction phase. The oLEMP sets out the long-term management regime for landscaping works across the Site to deliver the project's design principles which include the retention and enhancement of existing vegetation, introduction of new hedgerows and belts of native trees, which would all contribute to improved screening of any

replacement activities. The oLEMP also establishes development-free buffers along PRoW, hedgerows and watercourses which would help to mitigate effects from any replacement campaign, not only in relation to landscape and visual effects but also in relation to other environmental topics. The oLEMP's management of established planting, hedgerows and belts (including inspections and remedial works) and the oOEMP's operational landscape controls would also be retained during replacement campaigns, so that any short-term activity is filtered by established screening.

- 3.2.2 As noted above, a replacement campaign would not require new internal tracks or earthworks and there would also be no requirement for construction compounds or any significant laydown areas around the site. The main operations / spares building and compound would be used to provide a central hub for temporary storage of components. Operational site access would be via the existing public highway using accesses created and retained at construction, with no requirement for vegetation clearance to facilitate replacements or maintenance of the Scheme. As such, the magnitude of landscape change would be low and there would be no change in landscape character.
- 3.2.3 Adverse visual effects were predicted for a limited number of sections of the public rights of way network, located within or in close proximity to the Site during the operational phase, with such effects remaining after 10 years of the landscaping being put in place. Due to the enhanced screening which would have developed since the scheme became operational the visual effects of replacement activities, which would be temporary and short term, would not alter the conclusions of the Landscape and Visual assessment. Even where replacement works may be visible from public rights of way or permissive paths, the replacement activities would not remain within the view for more than a week or two. Moreover, any views from receptors looking towards the Site from more distant viewpoints would also include an operational solar farm, as well as being filtered by the landscape planting.

3.2.4 As such, the magnitude of effects from replacement activities are considered to be small and short term, and therefore no new or likely significant adverse visual effects would arise from the replacement activities.

3.3 Cultural Heritage and Archaeology

Commented [PD32]: No comment to make

3.3.1 As no ground excavation is anticipated, archaeological receptors would not be directly affected. In the unlikely event that below ground works are required in a replacement phase (or indeed any Scheme maintenance work), the Areas of Archaeological Constraint identified in the **outline Archaeological Mitigation Strategy [REP2-034]** would continue to apply, and it would be necessary for the operator to adhere to the relevant mitigation measures.

3.3.2 As set out above, the landscape measures set out in the **oLEMP [REP2-032]** would have matured by the time a replacement campaign is required, and therefore heritage assets would benefit from enhanced screening from the replacement works in comparison to the construction phase works. Also, as noted above, the overall duration and the presence of replacement activities within any part of the Site would be of a lower magnitude than anything experienced during the construction period. As such any potential setting effects on heritage assets would be restricted to a temporary, small-scale presence of maintenance crews and equipment seen within the context of an already operational site. They would not be significant in their own right, and due to their limited scale and duration would not result in materially different conclusions to the operational phase assessment.

3.3.3 Based on the above, no new or materially different likely significant adverse effects on buried archaeology or the setting of heritage assets would occur during a replacement campaign.

3.4 Ecology and Nature Conservation

Commented [PD33]: No comment to make

3.4.1 In considering the potential effects from a replacement phase on ecology and nature conservation, it is relevant to note the following:

- Replacement activities for the solar panels would be limited to the panel rows, which would be located in areas of neutral grassland and existing access tracks.
- The BESS and substation compound is hard surfaced and would not result in the loss of any habitats during replacement works.
- Power Conversion Units (PCUs) and other built infrastructure can all be removed and replaced from established access roads.
- Hedgerows, ditches, trees and wetland habitats are protected from damage via the established buffers, as set out in section 4.4.2 of the **oLEMP [REP2-032]**.
- The replacement phase would use existing site access roads.
- There would be no need for satellite construction compounds.
- There would be no need for vegetation removal / habitat loss.

3.4.2 Whilst the potential for likely significant effects would be limited by the abovementioned factors, the Applicant recognises that the works could still have the potential to give rise to temporary disturbance to habitats and wildlife. Accordingly, Table 5.3 of the **oOEMP [as updated alongside this submission]** provides specific operational controls for maintenance and periodic replacements. Prior to any major replacement campaign, ecological surveys will be carried out for protected species, including otters, water vole, badgers, roosting bats, great crested newts, and breeding birds. As referred to in Section 2.0 of the **oOEMP [as updated alongside this submission]**, should any protected species be identified, appropriate mitigation measures would be implemented in accordance with relevant legislation and best practice guidelines and any relevant management plans, ensuring their protection throughout operational activities.

3.4.3 The ES concluded that the Scheme would not give rise to significant adverse effects on species or habitats during the construction phase and that it would

generate significant beneficial effects during the operational phase. Based on the reasoning provided above, effects on habitats and species during replacement activities would be mitigated or avoided to such an extent, it is reasonable to conclude that any replacement campaign would not cause likely significant adverse effects on ecological receptors or undermine the significant beneficial effects expected during the operational phase.

3.5 Flood Risk, Drainage, and Surface Water

Commented [PD34]: No comment to make

- 3.5.1 A replacement campaign has no potential to impact flood risk as the site layout, extent of hardstanding and overall quantum and extent of development would be unchanged from the parameters assessed in the ES. Furthermore, there would be no additional earthworks, access tracks or ditch crossings required to facilitate a replacement campaign. The **Flood Risk Assessment (FRA) [AS-018]** concluded that there would be no increase in off-site flood risk following adoption of the measures set out in the **outline Surface Water Management Plan (oSWMP) [REP1-046]**. Accordingly, the replacement activities would not increase off-site flood risk because no additional development would be added to the Site and there would be no works that could alter either surface water drainage capacity or flows. The development of a final SWMP would be secured through DCO Requirement 9. The final SWMP would need to be prepared in substantial accordance with the details set out in the oSWMP.
- 3.5.2 The ES also confirms that during operation, the final OEMP will integrate pollution prevention measures via the implementation of the Environmental Incident Management and Pollution Prevention Plan that will set out a structured response framework for any fuel or chemical spills, unexpected contamination events, and pollution control measures to prevent impacts on watercourses and groundwater, including risks that may arise during replacement activities.
- 3.5.3 The ES concluded that, once embedded and additional mitigation is accounted for, there would be no significant effects to flood risk during either

construction or operational stages of the Scheme. A replacement campaign would not alter those conclusions.

3.6 Traffic and Transport

Solar Panel Replacement Activity

- 3.6.1 As described in Section 2.0, the majority of vehicle movements generated during the operational phase would be associated with the replacement of solar panels.
- 3.6.2 It is anticipated that replacement solar panels would be delivered to the storage, operations and maintenance building in Site D using standard 16.5m articulated lorries, using the B645 between the A1 and the main Site access (SA16). A 16.5m articulated lorry is capable of transporting 630 panels. To replace up to 20% of panels within a single 12-month period would therefore generate a maximum of 220 HGV deliveries (440 two-way movements) .
- 3.6.3 As per the estimated duration of replacement activity identified in **Table 2** above, if a single crew were deployed to undertake solar panel replacement, the work would last for a total of 332 days, or 67 weeks, based on a 5-day working week. Realistically, therefore, in order to be able to replace up to 20% of panels within a single 12-month period, it would be necessary to deploy at least 2 work crews.
- 3.6.4 As such, based on the indicative timescales set out in **Table 2**, if two crews were used to undertake the replacement works this would result in an additional 3 two-way HGV movements per day for the estimated 166 working-day replacement programme. In the most intensive activity scenario, with 5 work crews deployed, there would be an additional 7 two-way HGV movements per day for the identified duration of 63 working days. This level of additional traffic movements would be imperceptible when set against general background traffic flows of approximately 8,000 two-way vehicles per day on the B645 between the A1 and the main Site access.

Commented [PD35]: Then the single crew option should be removed from this Note and a minimum of 2No. Crew set out in the oOCMP.

Commented [PD36]: It is not a matter of 'imperceptible', rather has this been set-out & assessed in the ES and oOTMP?

3.6.5 From Site D, panels would be distributed around the Site using 18t rigid flatbed vehicles. These vehicles are classified as medium goods vehicles. Each of these vehicles is capable of transporting 210 panels, and each work crew capable of replacing 420 panels in a single working day.

3.6.6 Based on these assumptions, Table 3 provides a breakdown of the forecast number of vehicle trips that would be required to replace up to 20% of the solar panels in the areas of the Site which would be served by each individual Site Access.

Table 3: Forecast Total Trip Generation for Solar Panel Replacement by Site Access

Site Area	Site Access	Total No. of Solar Panels Through Access	No. Vehicles to replace 20% of solar panels
A	SA01	134,280	128
	SA02	19,920	20
B	SA03	9,300	9
	SA04	6,120	6
	SA05	1,680	2
	SA06	34,050	33
	SA07	188,850	180
	SA08	58,890	57
	SA09	39,690	38
	SA10	8,940	9
	SA13	96,720	93

3.6.7 In addition to the figures presented in Table 3 above, there would also be a total of 92,700 solar panels within Site D. To replace 20% of these panels would require approximately 90 delivery trips. However, these movements would be internal to Site D and would therefore not be required to use the public highway network.

Commented [PD37]: Refer to comment regarding bulk area replacement vs isolated replacement across Site and related traffic impact. Applicant to revert.

And, if there is a commitment to full capacity loads of vehicles.

Applicant to review accordingly.

Commented [PD38]: Delivery to Site would require use of the public highway.

Also see Council observation regarding bulk vs isolated replacement.

Applicant to review accordingly.

3.6.8 The resultant forecast daily number of vehicle movements and the duration of the works would be dependent on the number of work crews deployed to undertake the replacement works, as set out in **Table 4**.

Table 4: Forecast Daily Trip Generation / Duration for Solar Panel Replacement

Site Area	Site Access	No. Vehicles to replace 20% of solar panels	No. of Crews							
			2 Crew (10 People)		3 Crew (15 People)		4 Crew (20 People)		5 Crew (25 People)	
			Duration of Works (Days)	No. Deliveries per day	Duration of Works (Days)	No. Deliveries per day	Duration of Works (Days)	No. Deliveries per day	Duration of Works (Days)	No. Deliveries per day
A	SA01	128	32	4	21.5	6	16	8	13	10
B	SA02	20	5	4	3.5	6	2.5	8	2	10
	SA03	9	2.5	4	1.5	6	1.25	8	1	9
	SA04	6	1.5	4	1	6	0.75	6	0.6	6
	SA05	2	0.5	2	0.3	2	0.2	2	0.2	2
	SA06	33	8.5	4	5.5	6	4.5	8	3.5	10
	SA07	180	45	4	30	6	22.5	8	18	10
	SA08	67	14.5	4	9.5	6	7.25	8	6	10
	SA09	38	9.5	4	6.5	6	5	8	4	10
	SA10	9	2.5	4	1.5	6	1.25	8	1	9
C	SA13	93	23.5	4	15.5	6	12	8	9.5	10

3.6.9 The approximate duration of works within each Site Access is calculated based on 20% of the total number of solar panels within each Site area, as set out in **Table 3**, and the assumption that a single work crew can replace 420 panels in a single day, as described above. It should be noted that the total estimated duration of works set out in **Table 2** includes the replacement activity within Site D. However, the figures included within **Table 3** only include the replacement works which would impact the local highway network, i.e. excluding Site D.

3.6.10 This demonstrates that if 2 work crews were used, there would be a requirement for a maximum of 4 delivery vehicles per day. In the worst-case traffic generation scenario, a team of 5 work crews would generate a total of 10 deliveries per day, albeit over a much shorter period.

3.6.11 It should be noted that the forecast number of daily delivery trips are not cumulative. Since replacement crews would only ever be working within a single area of the Site out of a single Site Access at any one time, irrespective of the number of crews as set out at 2.3.19 – 2.3.20.

3.6.12 As described in Section 2.4, and as illustrated in the Proposed Operational Access Strategy Plan in Appendix A, vehicle movements during the operational phase, including replacement activities, would be required to route along sections of the public highway network which were not used during the construction phase, specifically Moor Road; B645 The Highway through Staughton highway; Causeway / The Town through Great Staughton; and Little Staughton Road and B660 Kimbolton Road through Pertenhall.

3.6.13 **Table 5** below identifies the maximum daily trip generation to replace up to 20% of panels and the total duration of replacement activity along each of the affected sections of highway based on the number of Site Accesses that would be accesses along each section of the highway network, and the realistic minimum and maximum number of work crews that would be deployed.

Table 5: Forecast Impact of Solar Panel Replacement on Local Highway Network

Area	Highway Link	Site Access	2 Work Crews (10 people)		5 Work Crews (25 people)	
			Max. Daily Trips (One-Way)	Total Duration of Replacement Works (Days / Weeks)	Max. Daily Trips (One-Way)	Total Duration of Replacement Works (Days / Weeks)
East of Staughton Highway	B645 between Main Site Access & Moor Road	All	4	145 / 29	10	59 / 12
South-east of Staughton Highway	Moor Road	SA13	4	23.5 / 5	10	9.5 / 2
Staughton Highway	B645 The Highway	All except SA13	4	121.5 / 24.5	10	49.5 / 10
Staughton Highway / Great Staughton	Causeway					
Great Staughton	The Town					

West of Great Staughton	Great Staughton Road between Great Staughton & Spring Hill					
North of Green End	Spring Hill	SA10	4	2.5 / 0.5	9	1 / 0.2
	Great Staughton Road between Spring Hill & Green End	All except SA13, SA10	4	119 / 24	10	48.5 / 9.8
	Green End	SA07, SA08, SA09	4	69 / 14	10	28 / 5.6
	Great Staughton Road west of Green End	SA03, SA04	4	4 / 1	9	2 / 0.4
Pertenhall	Little Staughton Road	SA01, SA02	4	37 / 7.5	10	15 / 3
	B660 Kimbolton Road					

3.6.14 This indicates that the maximum daily trip generation associated with 20% solar panel replacement (i.e. with five crews) along any given section of the public highway would be 10 delivery trips (20 two-way movements). Again, it should be reiterated that these movements would not be cumulative, since work crews would only ever be working out of a single Site Access on any given day. In this scenario, the additional vehicle movements through Pertenhall would last for a total of 3 weeks, based on a forecast 5-day working week. Through Great Staughton, the total duration of trip generation associated with solar panel replacement in this scenario would be 10 weeks.

3.6.15 The minimum daily trip generation associated with solar panel replacement (i.e. with 2 crews) would be 4 deliveries (8 two-way movements). However, in

this scenario the duration of vehicle movements through Pertenhall and Great Staughton would be 7.5 weeks and 24.5 weeks, respectively.

- 3.6.16 The baseline traffic data obtained to inform the ES for the Site indicates approximately 16 two-way medium and heavy goods vehicle movements on weekdays along the B660 Kimbolton Road through Pertenhall, with approximately 2,100 weekday two-way total vehicle movements.
- 3.6.17 Along Great Staughton Road through Great Staughton the baseline traffic data indicated approximately 10 two-way medium and heavy goods vehicle movements on weekdays, with approximately 3,000 two-way total vehicle movements.
- 3.6.18 On this basis, with the minimum number of work crews an additional 4 movements per day in each direction through Great Staughton and Pertenhall would represent a material relative increase compared to the existing background medium / heavy goods vehicle movements, but the impacts would be imperceptible in relation to the total traffic flow through each settlement.
- 3.6.19 In the event that a greater number of work crews are deployed, the resultant additional number of vehicle trips would represent a larger increase in medium goods vehicles compared to the observed baseline flows, albeit over a much-reduced period. However, even an additional 20 two-way movements per day would still only represent an increase of approximately 1% on the total number of vehicle movements along the B660 through Pertenhall, and approximately 0.7% on the total number of vehicle movements along Great Staughton Road through Great Staughton.
- 3.6.20 In EIA terms, this is therefore considered to represent a low magnitude of impact. Across the majority of the affected highway network, which is of low or medium sensitivity, the effects of solar panel replacement traffic would therefore be of negligible or minor adverse significance, which is considered to be not significant in EIA terms.

Commented [PD39]: Should this statement and commitment not be made across the entire 'affected highway network' within the surrounding; i.e. not just 'majority'?

3.6.21 Due to the presence of Great Staughton Primary School on Causeway Road, delivery movements will be scheduled to occur outside of highway peak hours and school pick-up and drop-off times. This is secured within the **oOEMP [as updated alongside this submission]**. This will ensure that the deliveries would not result in a likely significant effect in EIA terms.

3.6.22 Furthermore, as noted, the duration of the impacts in this scenario would be commensurately reduced, with effects through Great Staughton limited to a 10-week period. It is considered that this level of additional movement would therefore be imperceptible when set against general background traffic.

Other Replacement Activities

3.6.23 As described in Section 2.0, a number of replacement activities, specifically replacement of transformer and battery units, would require components to be delivered directly to each area of the Site using 16.5m articulated vehicles.

3.6.24 All battery components would be located within Site D. There would be a total of 96no. battery storage units and 96no. battery transformers. On the assumption that each of these components would require a single HGV delivery, this would only generate a maximum of 2 two-way movements per day if every component was replaced within a single year. These vehicle movements would only occur on the B645 between the A1 and the main Site access.

3.6.25 There would also be a total of 52no. centralised inverters and 52no. solar transformers distributed across the Site, each of which would also require a single HGV delivery to replace. Based on the illustrative layout shown on **ES Vol 3 Figure 2-1 [APP-121]**, there would be a total of 11no. inverters and transformers within Site A, 27no. within Site B, of which 1 would be located within the parcel of land accessed via access SA02, 8no. within Site C and 6no. within Site D.

3.6.26 On this basis, the replacement of each of these components would generate a total of 48 two-way HGV movements along Little Staughton Road and the

B660 Kimbolton Road through Pertenhall. There would also be a maximum of 152 two-way HGV movements along Great Staughton Road related to replacement of centralised inverters and solar transformers. However, as set out at 2.3.28 centralised inverters and solar transformers would be replaced in a staggered campaign and delivered on a just-in-time basis for on-site installation and therefore it is highly likely that there would only ever be one delivery per day of this type, and therefore a maximum of 1 HGV movement per day in each direction.

- 3.6.27 Furthermore, as described in paragraph 2.4.5, all these movements would be routed via Moor Road through Site C to join Great Staughton Road via access SA12. As such, no HGV movements would pass through Great Staughton.
- 3.6.28 As described in Section 2.5, movements of HGVs would be managed in accordance with the approved operational access arrangements and the controls in the final OEMP, with ~~notification to advance liaison with the~~ relevant highway authority for written approval prior to undertaking the works where required.
- 3.6.29 In the unlikely event of transformer / inverter replacements occurring concurrently with solar panel replacement activity, there would be a cumulative maximum of 22 two-way delivery trips per day along Little Staughton Road and the B660 Kimbolton Road through Pertenhall, but there would be no additional impact on the B645 through Staughton Highway and Great Staughton.
- 3.6.30 There would be a potential cumulative maximum of 6 two-way HGV movements per day along the B645 between the A1 and the Main Site Access in the event that replacement of battery components and transformers / inverters occurred concurrently with solar panel replacement. There would be no overlap between HGV deliveries to the Main Site Access and internal distribution trips from the storage, operations and maintenance building, since these movements would be travelling in opposite directions to and from the Main Site Access along the B645.

3.7 Noise and Vibration

3.7.1 Noise impacts during the replacement phase are most likely to occur as a result of vehicle movements, the use of forklifts, telehandlers, hand tools, and general noise from removal/installation works. However, any noise impact would be significantly less than during the construction phase on account of the following factors:

- Activities with the highest noise levels, such as piling or excavation works, would not be necessary in a replacement phase.
- Works would be temporary and **intermittent**, and would quickly move around the site, preventing a continuous noise source occurring for an extended period of time in any part of the **site**.
- All works would be carried out on weekdays and during daytime working hours (other than in **emergencies**).

Commented [PD40]: But as demonstrated, the cumulative affect could by long durations across the local area which would NOT be 'intermittent'.

Commented [PD41]: Check commitment set out in oCEMP & oOEMP

3.7.2 In addition to the above, and as set out within Table 5.6 of the **oOEMP [as updated alongside this submission]**, the proposed management measures for maintenance and repair activities at the Site, include the adoption of Best practical measures that would be employed to control noise generation in accordance with BS5228 1:2009+A1:2014 (e.g. using equipment that is regularly maintained, where practicable use equipment fitted with silencers or acoustic hoods).

3.7.3 The Noise Assessment within **ES Vol 1 Chapter 10 [APP-046]** concludes that the levels of noise, during the construction and operational phases would only result in a negligible to minor effect at all receptors and would not be significant. Given the absence of the most significant noise generating activities in the replacement phase, the temporary and transient nature of the works and the implementation of appropriate mitigation measures, the effects would be much less than those assessed and on that basis, it is, therefore, not considered that likely significant noise effects would occur during a replacement phase.

3.7.4 There has been no assessment of noise impacts associated with transport movements in a replacement phase which would use the public highway and travel through existing settlements. In this regard it has been established in Section 3.6 of this Technical Note (traffic and transport) and in Section 2.0 above that:

- In a 20% replacement scenario there would only be a maximum of 20 two-way HGV movements per day.
- All works would and associated deliveries would be carried out in the daytime period and during **weekdays**.
- The roads in question are already used by large goods vehicles and large agricultural vehicles.
- The additional movements associated with a 20% replacement phase would represent only a negligible increase in traffic when set against existing movements, would be well within the limits of deviation that could reasonably be expected each day, well below any thresholds where significant adverse effects are likely to occur and would be temporary in nature.

Commented [PD42]: These commitments need to be set out in oCEMP & oOEMP by the Applicant.
Applicant to review accordingly.

3.7.5 Whilst the Noise Assessment did not explicitly assess a replacement campaign within the operational phase, it did include a construction phase assessment of the additional noise effects that would occur on local routes were construction traffic to travel along them. It is based upon the worst-case assumption regarding construction traffic and assumes:

- Maximum HGV - Maximum HGV movements during a single month.
- Maximum Staff – Maximum staff movements during a single month.
- Average - The total number of construction traffic movements (HGV and staff) averaged over a 30-month construction period.

3.7.6 The assessment concluded that based upon each of these scenarios no significant adverse effects would occur due to the additional traffic on the local road network. As set out in Section 3.6 above, even assuming the worst-case vehicle movements in a 20% solar panel replacement phase they would fall

well below those required in the main construction phase. As such, it can be concluded that the vehicle movements associated with a replacement campaign would not result in likely significant effects.

3.8 Air Quality

Commented [PD43]: No comment to make

3.8.1 There would be limited potential for emissions from vehicles during a replacement phase, with the number of additional daily vehicle movements within a 20% replacement phase expected to be 20 two-way under the maximum assessment scenario (see Section 3.6 above).

3.8.2 The Institute of Air Quality Management (IAQM) has set out screening criterion to determine if the change in vehicle movements necessitate more detailed air quality assessment. The IAQM thresholds for roads that are not within an Air Quality Management Area (AQMA) are +100 HGVs and +500 LDVs per day on the local highway network. The predicted movements for a 20% panel replacement are therefore well below the indicative IAQM thresholds for assessment. Thus, no further assessment of vehicle emissions is deemed necessary and the additional traffic that would be temporarily generated in a replacement campaign would not result in likely significant adverse impacts on local air quality.

3.8.3 In addition to the above, it is also not predicted that there is potential for significant fugitive release of dust. This is on account of the lack of any earthworks in the replacement phase, the use of existing / established access tracks and adherence to the mitigation measures set out within the oOEMP [as updated alongside this submission]. The latter sets out best practice air quality controls for operational maintenance and periodic replacements, including dust suppression, internal speed limits, highway cleanliness and load securing.

3.9 Ground Conditions and Soil Quality

Commented [PD44]: No comment to make

3.9.1 No piling, excavation for cable routes, earthworks, laying of foundations or track construction would be required during a replacement campaign. If any

intrusive works were required, then focused ground investigation would be undertaken. The oOEMP [as updated alongside this submission] includes an Environmental Incident Management and Pollution Prevention Plan and an Unexpected Contamination Protocol to ensure appropriate response were contamination to be encountered, this would also apply to any replacement campaign.

- 3.9.2 Controls for ground conditions and soil quality during the operational phase are secured by the oOEMP [as updated alongside this submission] and the outline Soil Management Plan (oSMP) [REP1-044]. As there is not expected to be any excavations, it is not anticipated there will be any impact on soil quality. Nevertheless, the oSMP includes measures to be adopted during the operational phase in Section 5.2, implemented as part of the oOEMP. This includes measures to address any soil compaction from the use of machinery on site, specifically appropriate loosening of the soil using a winged tine subsoiler or deep ripper, and the area re-seeded.
- 3.9.3 Implementation of the measures set out in the oCEMP, in combination with the limited potential for ground disturbance during a replacement campaign, would ensure that replacement activities would not have the potential give rise to likely significant effects in relation to ground conditions and soil quality.

3.10 Socio Economics, Land Use and Tourism

Commented [PD45]: No comment to make

- 3.10.1 The Applicant has set out in Environmental Statement Volume 1 Chapter 14: Socio Economics, Land Use and Tourism [APP-050] the expectation of there being 20 gross direct full time employee equivalent roles on Site during the operational phase. This would include most of the staff required for a site maintenance and replacement works campaign, plus a limited number of additional construction staff who would be required on a temporary basis.
- 3.10.2 The outline Public Rights of Way Management Plan (oPRoWMP) [REP1-042] sets out that any temporary closures or diversions to public rights of way during the operational phase for maintenance activities would be agreed in advance with the relevant local authorities if required. However, this is not

expected to be needed. Where necessary, and to ensure the safety of the public and site operatives, temporary signage may be erected along the PRoW and permissive paths to warn users of planned or ongoing maintenance works.

Commented [PD46]: Applicant is referred to Council's to review of OPRoWMP.

- 3.10.3 The ES Chapter concluded that significant effects related to use of public rights of way during the operational phase would be unlikely in terms of tourism, socio-economics, and recreational experience. The limited and short-term effects during replacement activities would be temporary and would affect any given area for a limited time. As such, they are unlikely to cause significant impacts on tourism and recreation receptors.

3.11 Climate Change

Commented [PD47]: No comment to make

- 3.11.1 The embodied carbon and carbon arising from logistics during a panel replacement campaign would be materially lower than during the initial construction phase, because works would be limited to removing and refitting modules using the existing site infrastructure.

- 3.11.2 **ES: Volume 1 Chapter 5: Climate Change [REP2-012]** considers the greenhouse gas emissions from the operational phase, including the replacement of components. In this regard, Paragraph 15.5.4 states:

"The GHG emissions associated with the equipment (solar modules, transformers, inverters, batteries and fencing) has been factored into the replacement calculations within the operational stage of the GHG assessment. The emissions associated with replacement include those associated with the manufacture of the equipment, transport to the Scheme, and disposal and transport of waste materials (i.e. the swapped equipment). The replacement emissions due to the equipment life expectancy have been allocated to the year that each piece of equipment would be replaced based on the assumed life expectancy. The life expectancy of the equipment applied is conservative and is expected to be longer than applied. Therefore, the calculated GHG emissions associated with the replacement of equipment are conservative."

- 3.11.3 Further detail on how replacement activities have been assessed in relation to emissions is provided in the **ES Volume 2 Appendix 15-1 Greenhouse Gas Emissions Assessment [REP2-021]**.
- 3.11.4 The climate-related management measures set out in Table 5.11 of the **oOEMP [as updated alongside this submission]**, as well as the implementation of the waste hierarchy and the recycling provisions for panels, transformers and BESS components in Table 5.12 of the **oOEMP** would ensure that any carbon arising from a replacement campaign is minimised and materials are recovered as far as practically feasible.
- 3.11.5 For clarity, taking into account the need for replacement of panels, the **ES Volume 1 Chapter 15 [REP2-012]** concludes that the Scheme would have a significant beneficial effect on climate change.

3.12 Waste

Commented [PD48]: No comment to make

- 3.12.1 **The replacement** activities would give rise to waste PV modules, packaging BESS units and other ancillary / associated elements of the Scheme. **The outline Waste Management Plan (oWMP) [APP-164]** sets out the measures that are to manage waste during the operational phase and periodic replacements, including applying the waste hierarchy and segregation of streams of waste. End of life PV modules and BESS units would be dismantled and sent to specialist PV recycling facilities. This will be developed into a final WMP as secured by the **oOEMP [as updated alongside this submission]**.
- 3.12.2 As outlined in **Environmental Statement Volume 1 Chapter 16: Other Environmental Topics [APP-052]**, waste arisings during the operational phase (and therefore including replacement activities) are expected to be minimal and are not expected to have a significant effect.

4.0 CONCLUSION

- 4.1.1 There are several advantages to undertaking periodic replacement works, some of which are essential for the ongoing operation of the Scheme, while others provide efficiency benefits that will maximise the renewable energy that can be generated from the Site. However, it is recognised that replacement works, particularly any large-scale replacement campaigns, have the potential to cause impacts to environmental receptors.
- 4.1.2 The appraisal provided in this technical note establishes that large-scale replacement of panels or existing equipment during the operational phase would only give rise to very **minor temporary, localised and reversible effects** and would not result in any new or materially different significant environmental effects, beyond those assessed in the ES. Furthermore, the Applicant considers that the mitigation measures for the replacement activities are adequately secured via Requirement 9, which requires the operational environmental management plan submitted for approval to be substantially in accordance with the **oOEMP [as updated alongside this submission]**.
- 4.1.3 Irrespective of the measures which would be implemented in accordance with the details set out in the oOEMP, the Applicant recognises that a replacement campaign could occur many years into the future and the environmental baseline, regulations and surrounding development context could evolve in this period. **The oOEMP provides that, prior to any replacement activities which involve replacement of more than 20% of the solar panels within the Scheme within any 12 month period (a major replacement campaign), a notification must be submitted to the relevant LPA for approval with details of the management measures that are proposed to be put in place for those replacement activities, that are consistent with the principles of the final CEMP, PRoWMP, CTMP approved for the construction of the Scheme.**
- 4.1.4 Based on the above, it is considered that the Applicant has provided sufficient information to understand the likely significant effects of a replacement

Commented [PD49]: As shown, temporary could be quite an extensive period of effect and local harm which does need address.

Commented [PD50]: Refer to Council observation box as the summary and concluding position of the Council.

campaign. It is evident that the controls within the DCO, primarily the implementation of the OEMP pursuant to Requirement 9, and other measures secured through the DCO Requirements are adequate to ensure that the residual effects predicted within the ES would not be exceeded in a replacement campaign.

DRAFT

Appendix A: Proposed Operational Access Strategy Plan

DRAFT



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 10 July 2026
Ref: EPE 23-02405LPA/2.10D4

RESPONSE TO DEADLINE 4 Review of [REP1-043][REP3-058] outline Public Rights of Way Management Plan

Dear Sir,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141).

BBC Reference No.: 25/01836/DCO | Examination Ref. [REDACTED]

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: The Proposed Development comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Proposed Development also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) ([REDACTED]@bedford.gov.uk) ([REDACTED]@bedford.gov.uk) (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Planning Committee Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]

Date: 10 July 2026

[REDACTED]: Head of Planning and Building Control

Craig Austin, Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

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1.0 INTRODUCTION

1.1 Context of this Report

- 1.1.1 This report is prepared by Bedford Borough Council (the 'Council') in response to a review by the Host Authorities of the Applicant's [REP1-043][REP3-058] outline Public Rights of Way Management Plan; in response to matters raised by the Host Authorities (for example within the Local Impact Reports); oral representations made at the Issue Specific Hearing 3 (PRoW); and, is submitted as part of Deadline 4 (10 July).
- 1.1.2 To aid reading, the Council's central observations are set out below, with a more detailed review and commentary of the Management Plan set out as track changes and/or comments within the Applicant's Management Plan itself, attached as **Appendix B**.
- 1.1.3 Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submitted under separate cover for individual procedural sign-off purposes.
- 1.1.4 This review remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification within any further updated submitted material or similar to the Examination. The Council remains open to discussion.
- 1.1.5 This Report is solely that of Bedford Borough Council, submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

1.2 Written representation to Issue Specific Hearing 3 (PRoW) – Item 3c

- 1.2.1 The Council sets out their written representation to their oral representation as made at the Issue Specific Hearing 3 (PRoW) as follows:
- 1.2.2 The Council stated that the Applicant's approach, and that as enabled through the management plan, should accord with the key principles as set out in NPS-EN1 and 3, namely:
- a) EN1 §5.11.24 *'Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes'*.
 - b) EN1 §5.11.30 *'Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way'*.
 - c) EN3 §2.10.33 *'Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during*

- construction and protect users where a public right of way borders or crosses the site’.*
- d) EN3 §2.10.34 *‘Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site’.*
 - e) EN3 §2.10.36 *‘Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and ... new opportunities for the public to access ... (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners’.*
(underlining by Council)
- 1.2.3 The four headline points of concern raised by the Council/ Host Authorities regarding the Applicant’s current proposals were defined as:
- a) The Scheme does not maximise the opportunities to facilitate enhancements to the public rights of way and the opportunity to enable/ deliver connections to the local and strategic PRoW networks (both as existing and as work-in-progress by the Council as shared with the Applicant in say the Local Impact Report).
 - b) That the same statement above is made in terms of the permissive paths.
 - c) There is a lack of accessibility provided for all forms of Active Travel, and potential limitations to type of user with regard to the permissive paths.
 - d) There are concerns regarding the Applicant’s address of anti-social behaviour; what is viewed as priority given to construction traffic with regards to PRoWs; approach to diversions and temporary stopping-up; and, the use of PRoWs for construction traffic.
- 1.2.4 The Council referred to [APP-034] Design Approach para5.4.12 where four ‘opportunities’ were identified by the Applicant, inter alia:
- a) *Opportunity to upgrade public footpaths to bridleway status;*
 - b) *Opportunity to improve public rights of way / expand the public rights of way network across the Site;*
- 1.2.5 Whilst the Council is supportive of [APP-034] Section 5.2 Design Principles, in terms of the ES Aspect of PRoWs the Applicant has yet to:
- a) Evidence how they comply with NPS policy regarding both mitigation and improvements (as underlined above).
 - b) Evidence how they are going to deliver against their Design Approach opportunities as identified by means of a set of detailed, measurable commitments.
- 1.2.6 As part of the Council’s oral representation at ISH3, the Council noted that they had prepared a ‘PRoW Vision Route’ strategy:
- a) This strategy illustrated the Host Authorities collective intent to create and/or enhance the countryside network of public rights of ways, bridleways, and contribute to the existing national cycleways, across the local sub-area to facilitate active travel between villages, towns, and towards point of destination.
 - b) The Council acknowledged that the strategy would be delivered as individual, possibly fragmented ‘route-links’, over the long-term. The Council noted however that they have used this approach to inform <50MW solar farm applications and other applications in bringing forward significant enhancements to the existing PRoW network in the immediate area of this Scheme.
 - c) The Council stated that the strategy needed to address all forms of Active Travel mobility.

- d) The strategy was submitted to the ExA to demonstrate how this Scheme could deliver improvements, enhancements, and create new links to deliver this broader sub-regional strategy (Strategy attached as **Appendix A**). A draft of the strategy map was submitted to all Parties at ISH3.
- 1.2.7 The Council noted the Applicant's commitments to permissive paths, but it was suggested that these are currently not secured in the DCO, they are not secured in perpetuity, and consequently should carry limited to no weight.
- 1.2.8 In the oral representations the Council asked for absolute clarity regarding approach, technical specification and delivery, legal framework, management and maintenance works, and intent at decommissioning. It was felt that to date the Council did not have sufficient clarity regarding this aspect.

1.3 Council's Review and Observations

- 1.3.1 **Observation 1 (Environmental Statement):** the Council notes that it is a requirement of environmental legislation and planning policy that a development should identify harm/ effect of that scheme and then table both a mitigation strategy AND an enhancement strategy to address the identified harm/effect. In [APP-034] Design Approach the Applicant has identified PRoW enhancement opportunities, however to date, neither 1.2.4 (a) nor (b) as underlined have been evidenced.
- 1.3.2 While the Council recognises that it is not practicable for all public rights of way running through the Site to be upgraded to bridleway, the Applicant has not identified a single such opportunity (as intended within [APP-034] para5.4.12).
- 1.3.3 **Observation 2 (Active Travel):** embedded in national policy is a requirement to encourage modal shift by making walking, wheeling, and cycling for both abled and non-abled bodies more attractive and more accessible. Local Planning Authorities are actively encouraged to engage with applications to deliver modal shift and create and/or improve a network of routes at various scale. Due to the unique locational extent of this Scheme (circa nine mile east to west) it has the real potential to deliver significant enhancement to the local sub-regional PRoW network(s). Further, the Scheme has the potential to upgrade existing PRoW and/or deliver new links that may prove a safer route than current PRoW links. Numerous suggestions for links and/or improvements (to encourage Active Travel) have been tabled by the Host Authorities but have been refused by the Applicant on the basis of land agreements with the landowners.
- 1.3.4 Consequently, as currently tabled, the Scheme offers no actual physical improvements, link improvements, or alternative links to the existing PRoW, as proposed by the Host Authorities. Further, the Scheme makes no commitments to Active Travel.
- 1.3.5 **Observation 3 (ISH3 - Technical specification):**
 - a) As raised at ISH3, no technical specification (regarding PRoW widths, materiality, nature of the PRoW green corridor; signage/ wayfinding; maintenance and maintenance regime; etc.) has been set out by the Applicant with sufficient clarity to enable a comprehensive understanding by the Council of the PRoW mitigation and enhancement measures that the Applicant intends to deliver across the PRoW network affected by the Scheme. Such a specification is required to monitor construction delivery, management and maintenance, and enforcement against an agreed common standard or document.

- b) As asked at ISH3, the Council has successfully applied Decision Notice Conditions to set out design standards regarding PRoW; namely:
 - *Paths should be multi-user routes (pedestrians, cyclists, and bridleway) and have a minimum width of three metres (pedestrians, cyclists)/ four metres (bridleway).*
 - *There should be a one metre green space either side of the routes. Vegetation must not be allowed to encroach on the paths.*
 - *Landscape management and maintenance details should be provided.*
 - *'...a minimum three-metres-wide footpath surface (compacted hoggins)...and the installation of timber wayfinding posts/ boards...' and '...proposed green corridors...minimum of three cuts of the grass footpath surface'; etc.*
- c) As stated at ISH3, the three Host Authorities do have PRoW technical design specifications, but would defer to Cambridgeshire County Council's adopted Active Travel Design Guide (March 2023) as this is the most comprehensive.
- d) While it is recognised that it is not practicable for all PRoWs through the Site to be enhanced and/or upgraded to bridleway status (as stated in [APP 034] Para 5.4.12), currently the Applicant has not committed to any enhancements that would address the requirements of the technical design specifications; i.e. the PRoWs will retain their current *status quo*.

1.3.6 **Observation 4 (Permissive Paths - Technical specification):** whilst the Council is supportive of the provision of permissive paths across the Site, an in-principle concern is raised that these are not retained in perpetuity and have limited to no physical improvement to their surfacing and the green corridor within which they are provided. They do not deliver any Active Travel enhancements.

1.3.7 [REP3-056] Table 2 (Permissive Routes) and §5.3.44: the statement that *'The final route, signage, waymarking, surfacing material and widths of proposed permissive paths will be defined in the final LEMP'* is in-principle not accepted by the Council. Some basic specification needs to be submitted by the Applicant for the Council to review if these routes contribute to actual access to the countryside, offer safe access, and address Active Travel requirements. The statement that the surfacing will be 'grass' does not address the Council's understanding if these routes are to be level, cleared access, or a pathway over rough terrain.

1.3.8 Currently the Application gives no technical specification of the permissive paths (other than as stated in Work No. 8). In contrast, EN010170 Green Hill NSIP DCO (March 26) the permissive paths are SPECIFICALLY defined: Work No. 10a— creation of permissive paths for the exclusive use of pedestrian users comprising:

- a) Ramps, bridges and other means of access;
- b) Fencing, gates, boundary treatment and other means of enclosure;
- c) Signs, interpretation boards or any other information display board; and,
- d) Landscaping and biodiversity mitigation and enhancement measures including planting.

1.3.9 Further, within Green Hill NSIP there is SPECIFIC reference in the DCO to 'PRoW AND PERMISSIVE Paths Management Plan (vs East Park Energy DCO Schedule 2 Part 1 Requirement 11).

1.3.10 This collectively gives the Council some surety regarding the nature of the permissive

paths' offer made by the Applicant.

1.3.11 **Observation 5 (Betterment):** with regards to [APP-034] Design Approach para5.4.12 '*Opportunity to improve public rights of way / expand the public rights of way network across the Site*' the Applicant suggests opportunities to improve/ enhance the existing PRow network. In this regard, the Applicant will need to:

- a) Undertake a Conditions Survey of the affected PRow stating existing condition (width, surfacing material, nature of green corridor, etc.) (It is noted that the ExA asked if this had been undertaken at ISH3).
- b) Apply for a Public Path Order under the Highways Act (1980) to register the change in materiality of the PRow and/or changing the routes status (e.g. from Footpath to Bridleway).
- c) It is suggested that the existing condition and suggested changes should be reflected in [REP3-058] Table 1 'PRow within Order limits'. At present the table states the 'interaction' with the PRow, but then does not set out remedial works/ enhancements that will be undertaken against each PRow.
- d) In this regard, the statement made in (Surfacing and reinstatement of PRow) para 5.1.6 '*Where the implementation of the final PROWMP requires any temporary or permanent change to the surfacing of a public right of way (including, but not limited to, temporary surface protection, temporary surfacing to facilitate a diversion, surface strengthening where a PRow is used as a construction access route, and reinstatement following trenching/crossings), the final PROWMP submitted pursuant to Requirement 11 must include full details of such surfacing works*' that this will only be set out, discussed, and concluded within the final PROWMP is not acceptable to the Council – such matters should be resolved within the Examination to evidence the Applicant's Design Principles' intent.
- e) The Applicant within Table 1 identifies 'No direct impact on PRow' but does not use the table to suggest opportunities for enhancement (as indicated by their Design Principles). (strikethrough suggested by Council)
- f) Betterment for each specific PROW should be explicitly detailed in the [REP3-009] DCO Agreement Schedule 6. Currently Schedule 6 Part 1 states the effect ('*Temporary management including temporary closure over the public right of way comprising a length of 15m at the point marked 1 on sheet 1 of the streets, public rights of way and access plans*') but does not state the betterment which should be recorded.

1.3.12 **Observation 6 (Corridor withs):** [APP-034] Design Approach para5.4.74 '*The Applicant has designed the Scheme to retain all existing public rights of way within the Order limits throughout the operational [and decommissioning] phase. All public rights of way will have a minimum 10m buffer between the centreline of the definitive right of way alignment and the solar fenceline either side, and such will be sat within minimum 20m wide corridors that will include grasslands, hedgerows, trees and woodland planting. The Applicant considered narrower and wider corridors as part of the design process, but concluded that 20m wide corridors were generally the right balance for efficiency of land use, whilst protecting amenity as far as possible. The final proposals for the landscape design of these corridors will be in substantial accordance with the Indicative Landscape Proposals shown in the outline Landscape and Ecological Management Plan [EN010141/DR/7.7]*'. This broad commitment is welcomed but should be read in conjunctions with say:

- a) The nature and width of the existing PRoW corridor (in some cases these may not be 20m wide);
 - b) How such proposed changes, if made, will affect the intrinsic nature and character setting of the existing PRoW as assessed within the Environmental Statement; and,
 - c) Understanding if this 20m wide corridor will be retained in perpetuity, or be reduced to the current width post decommissioning of the Scheme.
 - d) Differentiation is required on all PRoW as to which will and which will not provide 20m width from the centre line by the Applicant.
- 1.3.13 It is unclear why certain technical specifications and maintenance regimes regarding the PRoW are set out in the [REP3-056] oLEMP (§6.3.11-16 ; 6.4.14-16) but not within the oPROWMP – it is suggested that the aspect of PRoW is consolidated into one management plan to provide clarity and reference.
- 1.3.14 **Observation 7 (Green Lanes):** [APP-034] Design Approach para5.4.75 *‘In accordance with the objectives of the local green infrastructure strategies and the landscape management guidelines, where these routes pass through the Scheme the Applicant is proposing to make them ‘green lanes’ that will function not only for recreational access, but also as wildlife corridors improving habitat connectivity and ecosystem benefits’.* To date no details have been given as to which PRoW and how many PRoW are to be made “green lanes” and the nature of their technical specification.
- 1.3.15 **Observation 8 (Maintenance):** [APP-034] para5.4.78 *‘The surfacing and landscaping of the public rights of way will be managed throughout the lifetime of the Scheme in accordance with the outline Landscape and Ecological Management Plan’.* In order for the Council to review maintenance is adhered to, the Conditions Survey and technical specification is required in order to create a benchmark for any enforcement.
- 1.3.16 **Observation 9 (ISH3 - Early planting):** as raised in oral representation at ISH3, the Council noted the Applicant’s strategy of extensive planting to the affected PRoW network to screen and/or frame views of the Scheme. A concern raised at the Hearing was to do with address of failure of this landscape to establish and grow to the heights assessed in the LVIA. A review of the [REP3-056] oLEMP (say §6.5.3) suggests replacement, but such a strategy will need far greater clarity (i.e. SMART) to assure the Council that the assessed harm to the PROWs will be mitigated.
- 1.3.17 **Observation 10 (Temporary closure and diversions):** in terms of EN3 §2.10.33 (*‘to ensure continued recreational use of public rights of way’*), it is noted that:
- a) Temporary closure, restriction or prohibition of use of Public Rights of Way: temporary closures should be applied for to the Local Highway Authority (LHA) under Section 14 Road Traffic Regulation Act 1984. The Operator must not temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert any public right of way without first consulting and attaining the written approval of the LHA.
 - b) The Operator will need authorisation from the LHA to alter the surface of a PRoW.
 - c) The LHA will require details of what works are required to the surface and why, precise lengths and widths of those PROW that are affected, (which need to be shown on an annotated plan) and subsequent restoration remedial works. The LHA will need confirmation of a suitable alternative available route to be provided whilst the closure is effective. The LHA will need a comprehensive timescale for any proposed closure to

allow stakeholders to be advised.

- d) If any PRow to be used as a temporary access route has received authorisation from the LHA, the Operator must commit to restoring the PRow to the reasonable satisfaction of the LHA.
- e) Currently as tabled, the oPRowWMP does not provide clarity with regards to how engagement with the LHA will be undertaken on such matters.

1.3.18 **Observation 11 (Vehicle traffic):** as stated throughout representations made by the Council, the Council is in-principle NOT supportive of the Operator using the PRows for construction, operational, and maintenance vehicle traffic due to concerns regarding:

- a) General user safety (the Council has set out concerns within their representations regarding banksmen, visibility restricted by hedgerows, ditches adjacent to PRow, Bridleway safety, etc.). These need far greater clarity and assurances than currently tabled within the oPRowWMP.
- b) It is noted that transversing (i.e. perpendicular) a PRow to facilitate cross vehicle movement and/or the of laying of the cable across the PRow is acknowledged by the Council as being a requirement to enable delivery of the Scheme. There is no object to this on the basis that acceptable safety measures are put in place by the Operator.
- c) However, when the PRow is used as an access route for Scheme vehicles movement that the Council raises significant concern and a position of not supportive as it is suggested that alternative routes could be explored by the Applicant. To date no alternative routes have been tabled by the Applicant.
- d) These matters remain of significant concern. In this regard the Applicant has to date not tabled alternative access routes to enable construction et al traffic that excluded use of the PRow.
- e) Structural integrity: a PRow is not suitable for construction traffic without major structural alteration, work's closure to complete such, and long-term monitoring being put in place. This has not been addressed by the Applicant.

1.3.19 **Observation 12 (Decommissioning Phase):** the oPRowWMP should address the following matters:

- a) [APP-158] oDEMP para2.4.2 '*The Site will be returned to a condition suitable for return to its original use after decommissioning*' - if a route has been upgraded in status, width, or surfacing through the DCO then the Council request that such routes are not returned to their original state.
- b) Equally, if changes to the surface of a PRow are required at decommissioning, then this will be subject to S131A Highways Act (1980) whereby the Operator will require authorisation from the LHA to alter the surface and make remedial repairs.
- c) In all cases, the Operator will need to undertake a Conditions Survey to evidence to the LHA that the PRows are the same, or a betterment of the PRow, as surveyed at the inception of the Construction Phase.
- d) Para 4.1.17 '*Where Public Rights of Way (PRow) cross the Site or interact with decommissioning access routes they will be suitably managed to protect the public. Management of PRow is likely to involve the use of mesh fencing or Heras fencing as appropriate in order to clearly demarcate and separate PRow from decommissioning*

traffic and activities. Where necessary, banksmen would be utilised where decommissioning traffic is required to cross a PRow - the Operator will be required to table a Decommissioning Phase PRowWMP for the written approval of the LHA prior to undertaking decommissioning works. This is essential to ensure public user safety. This MP will need to address inter alia, what works are required to the surface, precise lengths and widths that are affected, subsequent restoration remedial works, and timescale for any proposed closure to allow stakeholders to be advised.

- e) The Operator is required to contact the LHA as we will require details of what works are required to the surface and why, precise lengths and widths that are affected, and subsequent restoration remedial works. We will need a comprehensive timescale for any proposed closure to allow stakeholders to be advised.
- f) This process is not set out in the oPRowWMP.

1.3.20 Observation 13 ([REP3-058] general):

- a) General safety of PRow users (§6.16.3, 6.17.3, 6.17.6, 6.18.3, 6.19.3): the Council is supportive of the introduction of proposed warning signage for Scheme vehicles approaching crossing points over, alongside, and/or on* PRow (Footpaths and Bridleways). However, give-way markings should also be provided to ensure that vehicles are encouraged to come to a complete stop before affecting the PRow. This is particularly relevant if there are locations where visibility of potential PRow users is restricted meaning drivers are unable to make a judgement on whether or not it is safe to cross the PRow without first coming to a halt; where there is potential for horse flight; etc.
- b) Operational hours (§6.17.7 and 6.18.4): use of e.g. Bridleway 112/7 and Footpath 112/8 'outside of construction hours' - permitting Scheme use of the PRow at different times of the day risks confusion for operatives and PRow users with related implied safety concerns*.

* However, as noted in the Council's [REP1-071] Local Impact Report, in-principle, the use of PRow's for Scheme vehicle traffic is NOT supported.

- c) Diversion (§6.18.1 and 6.18.2): it is unclear why a temporary PRow diversion is required (para 6.18.2) when in para 6.18.1 it is stated that construction phase traffic will have no direct impact on Footpath 112/8.
- d) Defects (§7.1.5): Chp 7 in general does not address the planning requirement under which the Operator will be required to rectify defects on the affected PRow during all phase of the development caused by the Scheme's activity. This requirement should be expanded to include a Conditions Survey, that details the completion of defect repairs within the Operator's control where not unreasonably requested by the local highway authority.
- e) Closure (§7.1.16): any temporary closures or diversions to public rights of way - refer to Observation 10.
- f) §7.2.4: the Host Authorities (as LHA) would welcome discussions with the Applicant about the proposed steps with regard to protecting the permissive access paths in the event of anti-social behaviour. They would request entry into a formal agreement outlining the terms, and introduction of a mechanism for ensuring the terms are

observed. This comment also applies to paras 5.3.45 and 5.3.46 of the oLEMP [REP3-057].

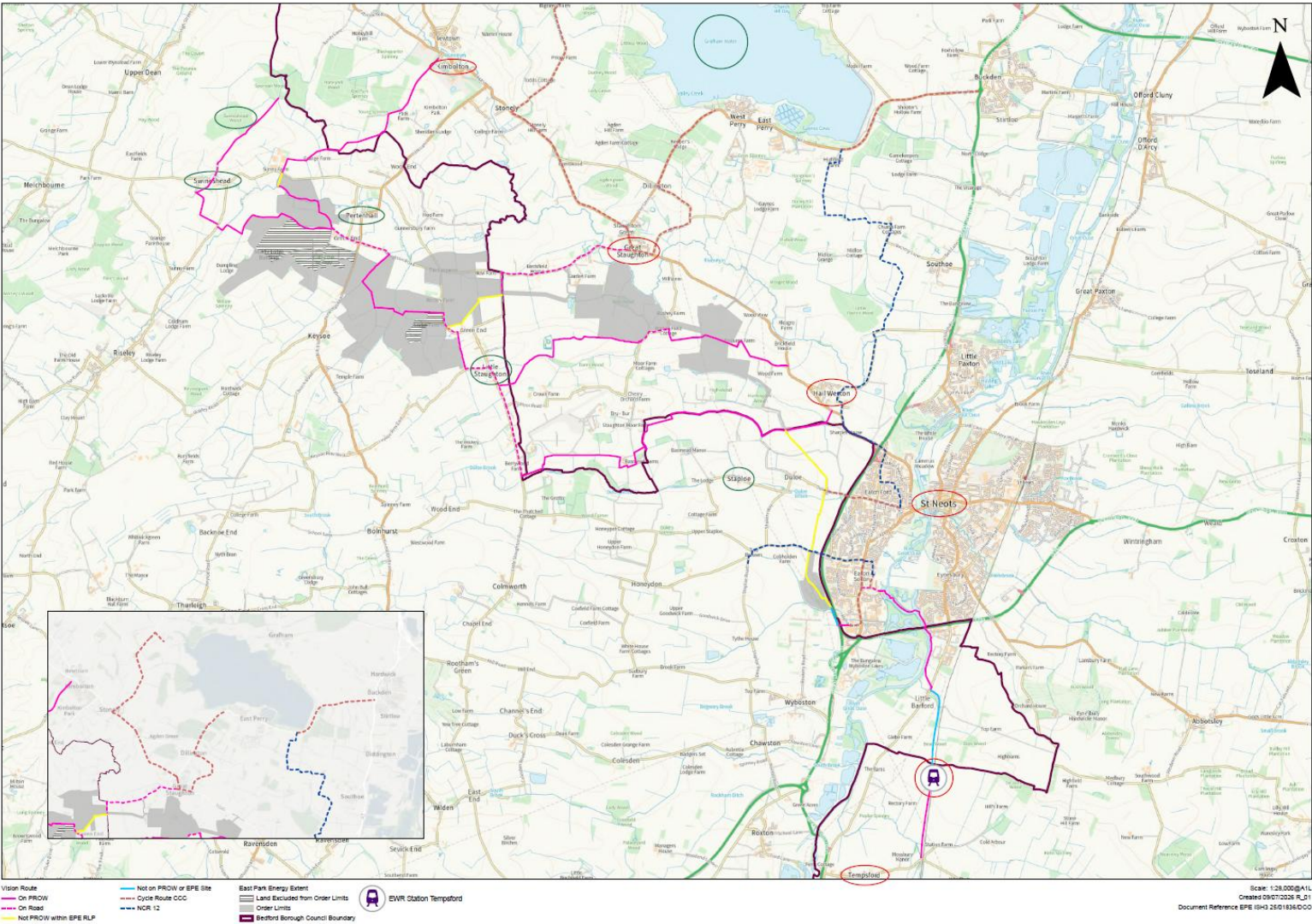
- 1.3.21 **Observation 14:** in terms of all Management Plans these should address and be structured along the lines of/ be: Specific; Measurable; Achievable; Relevant; Time-bound: i.e. SMART. Currently this universal management approach/ tool is not evident.
- 1.3.22 **Observation 15 (DCO Agreement):** the DCO Agreement should reflect the changes made to the PRoW and address of permissive paths as noted above.
- 1.3.23 The Council has undertaken an extensive review of the Technical Note and the various Management Plan – these reviews should be read both in the singular and as a collective review across the suite of inter-related documents.

2. CONCLUSIONS

- 2.1 As currently tabled and as reviewed by the Council, the [REP3-058] outline Public Rights of Way Management Plan (oPROWMP) is lacking detail, clear commitments, and assurances as would be required of a long-term (40-year) management strategy. On this basis, the Public Rights of Way Management Plan is NOT Supported.

PD-QA/11pg end

Appendix A: (ISH3) PRoW Vision Route Strategy



Appendix B: [REP1-043][REP3-058] outline Public Rights of Way Management Plan – Track changes



EAST PARK ENERGY

East Park Energy

EN010141

Outline Public Rights of Way Management Plan

[REP1-043][REP3-058]

BBC/HA Review (10 July Deadline 4):

Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submitted under separate cover for individual procedural sign-off purposes.

This review, as attached to a cover letter, remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification as set out in the review below within any further updated submitted material or similar to the Examination.

The review is submitted without prejudice and the Council reserve the right to comment further as may be necessary.

The reference to 'Council' (singular) should be read interchangeably with the term 'Host Authorities' (plural).

Commented [PD1]: Plan needs focus and clarity; as currently tabled NOT supported. Greater details is required to exact measures, specifications, works. This should be a plan that enables/ informs planning enforcement.

2026

~~September 2025~~ April

Version ~~P01~~ P02

EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Outline Public Rights of Way Management Plan

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/7.8
Author:	Axis PED Ltd

Version	Date	Status
P01	September 2025	DCO Submission
P02	April 2026	Deadline 1

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COUNCIL'S OBSERVATIONS:

The Applicant is referred to the Cover Letter: Response to Deadline 4 – review of [REP3-058] outline Public Rights of Way Management Plan (7 July) which sets out the executive observation of the Council's review on this Management Plan.

It is noted that the Council has reviewed [REP1-043] against which these track-changes are made, and the amended [REP3-058] oProWMP.

1.0 INTRODUCTION

1.1 Background

1.1.1 This outline Public Rights of Way Management Plan (oPROWMP) has been prepared for the construction and operation phases of the East Park Energy project ('the Scheme'). This document has been prepared on behalf of BSSL Cambsbed 1 Limited ('the Applicant') as part of the application for development consent for the Scheme.

1.1.2 This oPROWMP is a control document that will be certified as part of the Development Consent Order (DCO) and implemented via a Requirement in Schedule 2 of the **draft DCO [EN010141/DR/3.1]**. Should the Scheme be consented, the DCO will require that a final Public Rights of Way Management Plan (PROWMP) is prepared prior to construction, in substantial accordance with this outline document.

1.1.3 The Public Right of Way and the Public Rights of Way are as defined in the draft DCO.

~~1.1.3~~ 1.1.4 This oPROWMP sets out the overall approach to managing the public rights of way (PRoW) potentially affected by the Scheme. The overarching purpose of the document is to ensure that PRoW remain safe ~~at all times~~ throughout the ~~duration construction and operational phases~~ of the Scheme, specifically during construction and maintenance works/ activity on Site.

1.2 Document Structure

1.2.1 The oPROWMP is structured as follows:

- **Section 2.0: The Scheme** provides a summary of the Scheme, ~~the construction period,~~ and the roles and responsibilities with regard to PRoW;
- **Section 3.0: Roles and Responsibilities** sets out the roles and responsibilities associated with the implementation of this management plan;

Commented [PD2]: In terms of all Management Plans these should address and be structured along the lines of/ be:

1. Specific
2. Measurable
3. Achievable
4. Relevant
5. Time-bound

i.e SMART

Commented [PD3]: Helpful to state how/ where replacement phase is addressed.

The Applicant may also need to state how the Decommissioning Phase is addressed and in which management plan (AQ).

-
- **Section 4.0: Public Rights of Way** identifies the extent of the PRow network within the Order Limits;

- **Section 5.0: Approach** provides an overview of the proposed methodology for managing the impact of the Scheme on the PRoW;
- **Section 6.0: Management of PRoWs during the construction phase** describes the specific management measures proposed for each impacted PRoW route during the construction phase; and
- **Section 7.0: Management of PRoWs during the operational phase** provides a summary of the proposed alterations and enhancements to the PRoW network that will be implemented and maintained during the operational phase and the interaction with new permissive paths that will be created by the Scheme.

Commented [PD4]: How/ where is the decommissioning phase addressed? Section 8.0 is silent on the phase.

4.3 Relationship with other management plans

~~4.3.1 This oPROWMP is part of a framework of environmental management documents that will be implemented across the lifetime of the Scheme. The final PROWMP will work alongside several other specific management plans, which provide further details on mitigation and management measures, pursuant to DCO Requirements:~~

- ~~• **Construction Environmental Management Plan (CEMP):** This plan will set out how the construction phase of the Scheme will be managed to avoid, reduce, or mitigate environmental impacts. It will cover topics like pollution prevention measures, dust and noise control, protection of wildlife, site waste management, and incident response protocols. The CEMP ensures that commitments made in the ES are translated into practical measures on-site. An **outline Construction Environmental Management Plan [EN010141/DR/7.3]** has been prepared and submitted with the application for development consent;~~
- ~~• **Construction Traffic Management Plan (CTMP):** This plan will set out how construction related traffic will be managed to minimise disruption and ensure safety. It covers measures such as designated routes for construction vehicles, site access arrangements, temporary signage, traffic marshalling, and restrictions on delivery times. An **outline**~~

~~Construction Traffic Management Plan [EN010141/DR/7.4] has been prepared and submitted with the application for development consent.~~

- ~~• **Operational Environmental Management Plan (OEMP):** This plan will set out how the operational phase of the Scheme will be managed to control environmental risks. An **outline Operational Environmental Management Plan [EN010141/DR/7.5]** has been prepared and submitted with the application for development consent;~~
- ~~• **Decommissioning Environmental Management Plan (DEMP):** This plan will set out how the decommissioning phase of the Scheme will be managed to control environmental risks. An **outline Decommissioning Environmental Management Plan [EN010141/DR/7.6]** has been prepared and submitted with the application for development consent;~~
- ~~• **Landscape and Ecological Management Plan (LEMP):** This plan will set out measures for landscape planting, habitat management, and biodiversity net gain, ensuring that mitigation planting and screening vegetation are effectively maintained. An **outline Landscape and Ecological Plan [EN010141/DR/7.7]** has been prepared and submitted with the application for development consent;~~
- ~~• **Soil Management Plan (SMP):** This plan will ensure the sustainable management of soils and materials by setting out strategies for handling, storage, and reuse of soils. An **outline Soil Management Plan [EN010141/DR/7.9]** has been prepared and submitted with the application for development consent;~~
- ~~• **Surface Water Management Plan (SWMP):** This plan will detail site-wide measures for managing drainage, rainfall runoff, and groundwater interaction. An **outline Surface Water Management Plan [EN010141/DR/7.13]** has been prepared and submitted with the application for development consent;~~
- ~~• **Archaeological Mitigation Strategy (AMS):** This plan sets out the management of archaeological remains, both known and currently unknown, across the lifetime of the Scheme. An **outline Archaeological**~~

~~Mitigation Strategy [EN010141/DR/7.15] has been prepared and submitted with the application for development consent.~~

~~1.3.2 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly by the Site Manager, Environmental Manager, and relevant regulatory authorities. Monitoring results will be documented as part of the compliance framework for the Scheme.~~

2.0 THE SCHEME

2.1 Order Limits

- 2.1.1 The area of land required for the construction, operation and maintenance of the Scheme, which includes land required for permanent and temporary purposes, is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. This is referred to as the 'Order Limits' or the 'Site'.

2.2 The Site

- 2.2.1 The 'Site' is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council (BBC) (a unitary authority) and Huntingdonshire District Council (HDC) (a two-tier authority with Cambridgeshire County Council). The Site location is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. The Site area extends to approximately 773 hectares (ha).

~~2.2.2 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, for ease of reference the Order Limits have been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:~~

- ~~• **East Park Site A** covering land west of the B660 between Portenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Portenhall and Risoley. East Park Site A lies either side of the Portenhall Brook, with access proposed from the B660 to the east.~~
- ~~• **East Park Site B** covering land between Portenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an~~

Commented [PD5]: Remove to a simple ref or statement.

~~elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.~~

- ~~• **East Park Site C** covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south eastern boundary, and from Little Staughton Road to the north west.~~
- ~~• **East Park Site D** covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.~~

~~2.2.3 With reference to **ES Vol 3 Figure 1 2: Site References [EN010141/DR/6.3]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are also shown on **Figure 1 2** and identified as:~~

- ~~• **Cable Corridor – Site B to Site C** which connects Site B to Site C across an unnamed road and arable fields.~~
- ~~• **Cable Corridor – Site C to Site D** which connects Site C to Site D across Moor Road and an arable field.~~
- ~~• **Grid Connection – Site D to Eaton Socon Substation** which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.~~

2.3 The Scheme

Overview

2.3.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS). The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

2.3.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant presently has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

~~2.3.3 Subject to the Scheme securing Development Consent in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning.~~

2.3.3 A more detailed description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

2.3.4 Regarding the PRoW network, as set out in Design Approach [APP-034] para 5.4.12, the following opportunities were identified by the Scheme:

- a) The opportunity to upgrade public footpaths to bridleway status; and
- b) The opportunity to improve public rights of way / expand the public rights of way network across the Site.
- c) The surfacing and landscaping of the public rights of way will be managed throughout the lifetime of the Scheme in accordance with the outline Landscape and Ecological Management Plan [EN010141/ DR/7.7] ([APP-034] para 5.6.78).

~~2.3.4~~

Site Access Policy Context

2.3.5 NPS EN-1 includes a reference to active travel stating at paragraph 5.14.9 that: "If additional transport infrastructure is needed or proposed, it should

Commented [PD6]: This is/ should be all set out in the CTMP

always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc) needed to enhance active transport provision".

2.3.6 The National Policy Statement for Renewable Energy Infrastructure (EN-3) ('NPS EN-3')³ (2023) notes that (paragraphs 2.10.41 to 2.10.45):

- a) "Public rights of way may need to be temporarily closed or diverted to enable construction, however, Applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site;
- b) Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site;
- c) Applicants are encouraged where possible to minimise the visual impacts of the development for those using the existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.
- d) Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account where appropriate the views of landowners.
- e) Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan."

~~2.3.5 The Main Site Access will be from the B645 into Site D, with all HGVs arriving into the Site from this point, and the majority of daily staff movements arriving into Site D. A small number of daily staff movements may access Sites A and B without passing through the Main Site Access.~~

~~2.3.6 The construction access strategy has been designed to avoid vehicles using the public highway as far as practicable. Once vehicles arrive in Site D from~~

~~the Main Site Access at the B645, a temporary access road will connect westward across fields to Site C, avoiding the use of Moor Road. From Site C, access will be taken north west via a new access track to an existing HGV access to Great Staughton Road where vehicles will follow the public highway to access Site B, thus avoiding large volumes of traffic passing through Great Staughton. Vehicles would be routed through Site B crossing Little Staughton Road close to Lodge Farm before continuing west towards the B660. At the B660 vehicles would follow the public highway for a short section before accessing Site A using an existing access at Manor Farm.~~

~~2.3.7 There are existing access tracks through the Site that will be utilised as far as practicable, as will existing agricultural access points from the public highway. It will be necessary to upgrade or restore sections of the existing access track in order to provide safe and suitable access for vehicles. It is also likely that temporary passing places will need to be established at intermittent positions along these tracks in order to manage vehicle movements during the construction phase.~~

~~2.4 Construction Hours of Work~~

~~2.4.1 Construction operations would generally be limited to 08:00 to 18:00hrs Monday to Friday and 08:00 to 13:00hrs Saturday, with no construction work on Sundays or Bank Holidays.~~

3.0 ROLES AND RESPONSIBILITIES

3.1 Site Team

~~3.1.1 The following are key roles during the construction phase that will have responsibility for implementing the final PROWMP, with responsibilities for each role also set out (this list is not definitive and additional roles and responsibilities may be added to the final PROWMP):~~

- ~~• **Principal Contractor** — This is a formal role established in the CDM Regulations (2015). The Principal Contractor will be appointed by the Applicant and will have responsibility for co-ordinating the construction phase of the Scheme.~~
- ~~• **Construction Project Manager** — The Principal Contractor will identify a Construction Project Manager who will have overall responsibility for implementation of the final PROWMP and all other DCO and legislative requirements.~~
- ~~• **Quality Manager** — The Quality Manager will have responsibility for quality assurance and compliance, document management and record keeping, inspections for quality control, management of risks, and process improvement related to quality control and assurance. For the final PROWMP, they will have responsibility for quality assurance of procedures and for management of documentation, records, and monitoring of the systems relating to the same.~~
- ~~• **Health and Safety Manager** — responsible for the monitoring and control of health and safety, and the rules and regulations arising from this.~~
- ~~• **Environmental Manager** — The Environmental Manager has responsibility for management of environmental matters related to the construction phase of the Scheme, including ensuring compliance with legislation, ensuring that mitigation, management and monitoring measures are implemented, and that best practice is applied during works. The Environmental Manager will be a point of contact with environmental bodies and other third parties as required to perform their duties.~~

Commented [PD7]: Should this not be in the CEMPs?

The Council would request notification of who is/are responsible for PROW management plan. Management of PROW is not the same as management of metalled highways (AQ).

Commented [PD8]: A singular statement as to who is responsible for this Plan would however be required; and how this is reported to who)

- ~~**Flood Warden** — The Flood Warden will be responsible for preparation, management, and response to flood incidents, inclusive of reacting to flood warnings and alerts.~~
- ~~**Community Liaison Officer** — The Community Liaison Officer will ensure that the Community Liaison Group (CLG) is established and will be the point of contact for the CLG, ensuring that regular updates are issued during the construction of the Scheme.~~

~~3.1.2 — These roles and responsibilities are indicative and will be confirmed in the final PROWMP.~~

~~3.2 — Stakeholders~~

~~Community Liaison Group~~

~~3.2.1 — As set out in the **outline Construction Environmental Management Plan [EN010141/DR/7.3]**, a CLG will be formed prior to construction and will continue through until ultimate decommissioning of the Scheme.~~

~~3.2.2 — During all stages of the project lifecycle, the purpose of the CLG will be to allow interested community members and bodies to be updated on progress and activities. The CLG will allow local residents to raise issues with the Community Liaison Officer and to act as a forum to discuss relevant issues for the construction of the Scheme. Membership will be open to the following non-exhaustive list of groups:~~

- ~~Parish Councils;~~
- ~~Local Businesses; and~~
- ~~Local Community Groups.~~

4.0 PUBLIC RIGHTS OF WAY

4.1 Public Rights of Way (PRoW) within the Order limits

4.1.1 The PRoW that interact with the Order Limits, and therefore have the potential to be directly affected by it, have been identified using public rights of way information held by BBC and ~~CCC~~.

Commented [PD9]: Please rewrite

~~4.1.2 The Scheme is likely to affect a total of 23 designated Footpaths and 5 designated Bridleways (collectively, 'ProWs'), as summarised in **Table 1**. This table ~~also~~ provides a brief summary of the potential anticipated impact(s) of the Scheme on each of the PRoW s routes. The descriptions set out within **Table 1** should be read in conjunction with the relevant sheets of the **Street Works, Rights of Way and Access Plan [EN010141/DR/2.4]**.~~

Commented [PD10]: In all cases this should state 'Footpaths' (AQ)

~~4.1.2.1.3 Further, this oPRoWMP should be read in conjunction with the Land and Crown Land Plan [APP-008]; the Street Works, Rights of Way and Access Plan [APP-010]; the Draft DCO Agreement [APP-016]; the Book of Reference [APP-021]; and the Land and Rights Negotiation Tracker [APP-022] to understand the full effect, powers requested and scope of works relating to the Public Right of Ways.~~

~~4.1.4 For clarity, Permissive Routes are addressed within the oLEMP rather than in this Management Plan.~~

~~4.2 Highways Act and the principle of PRoW~~

~~4.3 Active Travel Guidance~~

~~'New development should provide links to existing PRoWs and seek to create a network of walking, wheeling and cycling routes that connect places and enable activity. In the case of new development, the PRoW should be protected and enhanced. The impact of new development on a PRoW, including increases in demand, should be mitigated with suitable planning agreements or conditions set'.~~

~~4.4 Principle of User (Safety)~~

Commented [PD11]: There needs to be a section on:
1. Safety and priority FIRST for PRoW Users
2. Aspect regarding bridleways and horse safety
3. Aspect regarding cyclists and their safety (they travel quicker than pedestrians so their forward safety zone should be recognised)
4. Dark nights and limited visibility and PRoW user safety.

4.5 Condition surveys

4.6 Technical Specifications – Footpath*

4.7 Technical Specifications - Bridleway*

4.8 Technical Specifications – Permissive Path*

As taken from EN010170 Green Hill NSIP DCO (March 26) where the permissive path works are SPECIFICALLY defined:

Work No. 10a— creation of permissive paths for the exclusive use of pedestrian users comprising:

- (i) ramps, bridges and other means of access;
- (ii) (fencing, gates, boundary treatment and other means of enclosure;
- (iii) (signs, interpretation boards or any other information display board; and,
- (iv) landscaping and biodiversity mitigation and enhancement measures including planting.

Current the Scheme's DCO is silent on permissive paths (other than as stated in Work No. 8).

Further, within Green Hill NSIP there is SPECIFIC reference in the DCO to 'PRoW AND PERMISSIVE Paths Management Plan' (vs East Park Energy DCO Schedule 2 Part 1 Requirement 11).

This collectively gives the Council some surety regarding the nature of the permissive paths' offer made by the Applicant.

4.9 Technical Specifications – Signage, gates*

(*see CCC's 'Active travel design guide 2023)

As a minimum, the technical specification should address:

All works onsite to create and maintain an active travel route, together with PROW connecting onto the AT route throughout the development site, must include details regarding; (additionally, these details are applicable to how a PROW connects to a road)

- Fencing
- Gates or bollards
- boundary treatment and other means of enclosure
- signage and interpretation /information boards
- lighting
- exclusive use of pedestrian, cycle and equestrian users comprising— ramps, bridges and other means of access
- planting measures adjacent to routes
- surface types
- Inspection and standards of repair regimes for active travel route
- Maintenance cutting regimes for unsurfaced routes

4.10 Application for a PRoW Order (planning requirement)

[4.11 Operational Phase - maintenance strategy \(surface, verge, and landscape corridor\)](#)

[4.12 Operational Phase – reporting procedure](#)

[4.7 Hand-over condition surveys and 'making good'](#)

Table 1 – PRoW within Order limits

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Proposed effect and/or Potential interaction with PRoW
East Park Site A	Bedford Borough Council	Pertenhall 2 (a) Pertenhall 2 (b)	Footpath	Sheet 1 of 14 (3149-2.4-001)	A 10m section of the Pertenhall 2(a) footpath (north-west and south-east of Pertenhall Brook) would be used as a construction access road. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.2). A single construction access crossing point would be required across the Pertenhall 2(b) footpath north-east of Pertenhall Brook. There would also be a need for a temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site A	Bedford Borough Council	Pertenhall 10	Footpath	Sheet 1 of 14 (3149-2.4-001) Sheet 3 of 14 (3149-2.4-003)	No direct impact on PRoW.
East Park Site A	Bedford Borough Council	Pertenhall 11	Footpath	Sheet 1 of 14 (3149-2.4-001) Sheet 3 of 14 (3149-2.4-003)	No direct impact on PRoW.
East Park Site A	Bedford Borough Council	Pertenhall 17	Footpath	Sheet 1 of 14 (3149-2.4-001) Sheet 3 of 14 (3149-2.4-003)	No direct impact on PRoW.

Commented [PD12]: In various cases temporary closure is requested which will need to comply with giving notice via an Order (AQ)

Commented [PD13]: (Comment T1) The council has raised significant concern in their RR, WR, LIR etc to the use of PRoWs for Scheme vehicle traffic, in principle the Council is NOT SUPPORTED. Regarding crossings/ trenching, significant concern has been expressed regarding safety, technical stds, etc.

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
East Park Site A	Bedford Borough Council	Pertenhall 18	Footpath	Sheet 1 of 14 (3149-2.4-001) Sheet 3 of 14 (3149-2.4-003)	A single construction access crossing point would be required across the Pertenhall 18 footpath (see Section 6.3). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site A	Bedford Borough Council	Pertenhall 26	Bridleway	Sheet 1 of 14 (3149-2.4-001) Sheet 3 of 14 (3149-2.4-003)	A 350m section of the Pertenhall 26 bridleway would be used as a construction access road. There would also be a single construction access crossing point over this PRoW. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.4).
East Park Site A	Bedford Borough Council	Pertenhall 29	Footpath	Sheet 1 of 14 (3149-2.4-001) Sheet 3 of 14 (3149-2.4-003)	A 455m section of the Pertenhall 29 footpath would be used as a construction access road. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.5).
East Park Site A	Bedford Borough Council	Bolnhurst and Keysoe 32	Footpath	Sheet 1 of 14 (3149-2.4-001)	A 280m section of the Bolnhurst and Keysoe 32 footpath would run parallel to a construction access road. A single construction access crossing point would be required across the footpath. As such it would be necessary to implement measures to avoid conflicts between

Commented [PD14]: Matter of Temporary Closure (AQ)

Commented [PD15]: See Comment T1 above

Commented [PD16]: See Comment T1 above

Commented [PD17]: See Comment T1 above

Commented [PD18]: Matter of Temporary Closure (AQ)

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
					users of the PRoW and construction traffic (see Section 6.6).
East Park Site A	Bedford Borough Council	Bolnhurst and Keysoe 34 (a) Bolnhurst and Keysoe 34 (b)	Footpath	Sheet 1 of 14 (3149-2.4-001) Sheet 2 of 14 (3149-2.4-002)	No direct impact on PRoW.
East Park Site A	Bedford Borough Council	Bolnhurst and Keysoe 35	Footpath	Sheet 3 of 14 (3149-2.4-003)	A single construction access crossing point would be required across the Bolnhurst and Keysoe 35 footpath (see Section 6.7). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site A	Bedford Borough Council	Bolnhurst and Keysoe 37	Bridleway	Sheet 2 of 14 (3149-2.4-002) Sheet 3 of 14 (3149-2.4-003)	A 1,670m section of the Bolnhurst and Keysoe 37 bridleway would be used as a construction access road. There would also be 3no. construction access crossing points over this PRoW. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.8).
East Park Site A	Bedford Borough Council	Bolnhurst and Keysoe 40	Bridleway	Sheet 1 of 14 (3149-2.4-001) Sheet 2 of 14 (3149-2.4-002) Sheet 3 of 14 (3149-2.4-003)	A single construction access crossing point would be required across the Bolnhurst and Keysoe 40 bridleway (see Section 6.9). There would also be a need for the temporary

Commented [PD19]: See Comment T1 above; applicable to all below as necessary.

Commented [PD20]: Matter of Temporary Closure (AQ)

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
					localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site A	Bedford Borough Council	Swineshead 15	Footpath	Sheet 2 of 14 (3149-2.4-002)	No direct impact on PRoW.
East Park Site B	Bedford Borough Council	Bolnhurst and Keysoe 13	Footpath	Sheet 3 of 14 (3149-2.4-003) Sheet 4 of 14 (3149-2.4-004)	A 670m section of the Bolnhurst and Keysoe 13 footpath would run parallel to a construction access road, with 3no. construction access crossing points. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.10).
East Park Site B	Bedford Borough Council	Bolnhurst and Keysoe 36	Footpath	Sheet 3 of 14 (3149-2.4-003) Sheet 4 of 14 (3149-2.4-004)	No direct impact on PRoW.
East Park Site B	Bedford Borough Council	Bolnhurst and Keysoe 47	Footpath	Sheet 4 of 14 (3149-2.4-004)	2no. construction access crossing points would be required across the Bolnhurst and Keysoe 47 footpath (see Section 6.11). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site B	Bedford Borough Council	Bolnhurst and Keysoe 112	Footpath	Sheet 4 of 14 (3149-2.4-004)	No direct impact on PRoW.

Commented [PD21]: Matter of Temporary Closure (AQ)

Commented [PD22]: Matter of Temporary Closure (AQ)

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
East Park Site B	Bedford Borough Council	Little Staughton 1	Footpath	Sheet 5 of 14 (3149-2.4-005) Sheet 7 of 14 (3149-2.4-007)	A single construction access crossing point would be required across the Little Staughton 1 footpath (see Section 6.12). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site B	Bedford Borough Council	Little Staughton 3	Footpath	Sheet 6 of 14 (3149-2.4-006)	No direct impact on PRoW.
East Park Site B	Bedford Borough Council	Little Staughton 4	Footpath	Sheet 4 of 14 (3149-2.4-004) Sheet 6 of 14 (3149-2.4-006)	A 150m section of the Little Staughton 4 footpath would be used as a construction access road. There would also be 2no. construction access crossing points over this PRoW. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.13).
East Park Site B	Bedford Borough Council	Little Staughton 8	Footpath	Sheet 4 of 14 (3149-2.4-004) Sheet 5 of 14 (3149-2.4-005) Sheet 6 of 14 (3149-2.4-006)	A single construction access crossing point would be required across the Little Staughton 8 footpath (see Section 6.14).
East Park Site B	Bedford Borough Council	Little Staughton 10	Footpath	Sheet 6 of 14 (3149-2.4-006)	No direct impact on PRoW.

Commented [PD23]: Matter of Temporary Closure (AQ)

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
East Park Site B	Bedford Borough Council	Little Staughton 11	Footpath	Sheet 6 of 14 (3149-2.4-006)	No direct impact on PRoW.
East Park Site B	Bedford Borough Council	Little Staughton 26	Footpath	Sheet 3 of 14 (3149-2.4-003)	A single construction access crossing point would be required across the Little Staughton 26 footpath (see Section 6.15).
East Park Site B	Bedford Borough Council	Bolnhurst and Keysoe 50	Footpath	Sheet 4 of 14 (3149-2.4-004) Sheet 6 of 14 (3149-2.4-006)	No direct impact on PRoW.
East Park Site C	Cambridgeshire County Council	Great Staughton 213/2	Footpath	Sheet 7 of 14 (3149-2.4-007) Sheet 8 of 14 (3149-2.4-008) Sheet 9 of 14 (3149-2.4-009)	2no. construction access crossing points would be required across Great Staughton footpath 213/2 (see Section 6.16). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site C	Cambridgeshire County Council	Great Staughton 213/1	Footpath	Sheet 9 of 14 (3149-2.4-009)	No direct impact on PRoW.
East Park Site C	Cambridgeshire County Council	Great Staughton 212/23	Footpath	Sheet 9 of 14 (3149-2.4-009)	No direct impact on PRoW.
East Park Site C	Cambridgeshire County Council	Great Staughton 213/28	Footpath	Sheet 8 of 14 (3149-2.4-008)	No direct impact on PRoW.

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
East Park Site D	Cambridgeshire County Council	Hail Weston 112/7	Bridleway	Sheet 10 of 14 (3149-2.4-010) Sheet 11 of 14 (3149-2.4-011)	A 280m section of Hail Weston bridleway 112/7 would be used as a construction access road. There would also be a single construction access crossing point over this PRoW. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.17). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site D	Cambridgeshire County Council	Hail Weston 112/8	Footpath	Sheet 10 of 14 (3149-2.4-010) Sheet 11 of 14 (3149-2.4-011)	A 410m section of Hail Weston footpath 112/8 would be used as a construction access road. As such it would be necessary to implement measures to avoid conflicts between users of the PRoW and construction traffic (see Section 6.18). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
East Park Site D	Cambridgeshire County Council	Hail Weston 112/5	Footpath	Sheet 11 of 14 (3149-2.4-011)	No direct impact on PRoW.
Grid Connection					A single construction access crossing point would be required across Hail Weston footpath 112/5 (see Section 6.19).

Site Ref.	Highway Authority	PRoW Reference	Type of Public Right of Way	Drawing Number(s) (Refer to Street Works, Rights of Way, and Access Plans [EN010141/DR/2.4])	Potential interaction with PRoW
Grid Connection	Bedford Borough Council	Staploe 16	Footpath	Sheet 12 of 14 (3149-2.4-012)	A single construction access crossing point would be required across the Staploe 16 footpath (see Section 6.20).
Grid Connection	Bedford Borough Council	Staploe 4	Footpath	Sheet 13 of 14 (3149-2.4-006)	A single construction access crossing point would be required across the Staploe 4 footpath (see Section 6.21).
Grid Connection	Bedford Borough Council	Staploe 8A	Footpath	Sheet 14 of 14 (3149-2.4-014)	A single construction access crossing point would be required across the Staploe 8A footpath (see Section 6.22). There would also be a need for the temporary localised diversion of the PRoW to facilitate the installation of internal cabling.
Grid Connection	Bedford Borough Council	Staploe 8	Footpath	Sheet 14 of 14 (3149-2.4-014)	No direct impact on PRoW.

5.0 APPROACH

5.1 Description of Proposed Management Methods

General Provisions

Commented [PD24]: The Council has responded extensively to this matter: NOT supportive of powers requested

~~5.1.1 The DCO would grant a number of necessary powers to manage and alter the PRow network within the Order Limits as follows:~~

- ~~• Subject to the consultation with the relevant street authority and provided access is maintained for pedestrians going to or from premises abutting a PRow affected by temporary stopping up, prohibition, restriction, alteration or diversion, article 11 (temporary stopping up of streets and public rights of way) of the draft DCO [EN010141/DR/3.1] provides powers to the undertaker to:~~
 - ~~○ Temporarily stop up, prohibit the use of, authorise the use of, restrict the use of, alter or divert the PRow specified in the table in Part 1 of Schedule 6 to the draft DCO; and~~
 - ~~○ Use any PRow which is within the Order Limits has been temporarily stopped up under article 11 as temporary working site.~~
- ~~• Article 11 also provides general powers to the undertaker to temporarily stop up, prohibit the use of, restrict the use of, authorise the use of, alter or divert any street or public right of way, to divert the traffic or a class of traffic from the street or public right of way for any reasonable time, and prevent all persons from passing along the street or public right of way for any reasonable time. These general powers are subject to the undertaker first obtaining the consent of the relevant street authority and require that access is maintained for pedestrians going to or from premises abutting the affected street or public right of way.~~
- ~~• As set out in Requirement 11 in Schedule 2 of the draft DCO, before any phase of the Scheme may commence or decommissioning is undertaken a PROWMP (which must be substantially in accordance with this ePROWMP) for any sections of public rights of way shown to be temporarily stopped up or diverted must be submitted to and approved by~~

~~the relevant planning authority, in consultation with the relevant highway authority, and must be implemented as approved.~~

~~5.1.2 The Applicant is committed to minimising disruption to the public along the PRow network wherever possible, but this needs to be balanced with the Applicant's commitment to safety during the construction and operation of the Scheme. Where a potential conflict between these two objectives has been identified by the Applicant, a pragmatic approach to safety will be taken, balancing the risks to PRow users against the disruption that removing the risk will cause.~~

Commented [PD25]: See LIR response

~~5.1.3 This ePROWMP has sought to retain access for the public through phasing / timing of works and implementation of mitigation measures based on the current understanding and assumptions of the Scheme. As noted, the plan would be further developed to a final PROWMP prior to construction of the Scheme by the appointed Principal Contractor. This will include undertaking PRow usage surveys where required to inform preparation of the final PROWMP. Where an alternative approach to PRow management emerges, this would be developed at the detailed design stage and would be subject to agreement with the local planning authority in accordance with the Requirements of the draft DCO [EN010141/DR/3.1].~~

Proposed Management and Mitigation Measures

Commented [PD26]: Not supported - see LIR.

~~5.1.4 The specific mitigation measures proposed for each of the PRow routes affected by the Scheme are described in the following sections, and illustrated in the Street Works, Rights of Way, and Access Plan [EN010141/DR/2.4].~~

Commented [PD27]: See detailed response on such matters: Not supported

~~5.1.5 The proposed management and mitigation measures comprise a combination of local management, managed closures, and local closures. These would follow the hierarchy of actions set out below:~~

- ~~• Where it is considered safe to do so, PRow routes within the Order limits will remain open, with appropriate signage to warn of the presence of construction vehicles, and to warn drivers of the presence of walkers,~~

~~cyclists or other non-motorised users. This would include the provision of managed crossing points where necessary where the PRow routes intersect with construction access tracks;~~

- ~~• Implementation of managed, short, temporary closures where construction activities might affect the safety of PRow users during construction hours, but the PRow can otherwise remain open outside of these hours; and~~
- ~~• When it is not considered safe to keep PRow open during construction works using managed, short, temporary closures, temporary full closures will be implemented, with appropriate PRow diversion routes provided.~~

Commented [PD28]: As above

Surfacing and Reinstatement of PRow works

~~5.1.65.1.1 The Where the implementation of the final PROWMP will identify for each PRow where requires any mitigation of effect/ harm measures, enhancement measures, temporary or permanent change, re-instatement post the Scheme' measures to the surfacing and landscaping verge of a public right of way (including, but not limited to, surface enhancement to attain technical planning standards, temporary surface protection, temporary surfacing to facilitate a diversion, surface strengthening where a PRow is used as a construction access route, and reinstatement following trenching and/or crossings), the final PROWMP submitted pursuant to Requirement 11 must include full technical details of such surfacing works.~~

Commented [PD29]: As part of the ES enhancements as committed to by the Applicant, the Council would want some permanent changes such as new surfacing to be retained on the active travel route to be identified; etc.
Permanent retaining of upgraded widths and legal status. It's no good providing all these improvements for it to revert after 40 years (PD & AQ).

~~5.1.75.1.2 The PRow works surfacing details must be submitted to and agreed by the relevant planning authority as part of the final PROWMP, in consultation with the relevant highway authority, and must be implemented as approved.~~

~~5.1.65.1.8 The PRow works surfacing details to be agreed must include the location and extent of the surfacing changes, the surfacing and technical specification and method of construction and landscaping installation, any measures required to maintain safe passage for PRow users during the works as approved, and the method and timing of reinstatement (including confirmation of the standard to which the PRow will be reinstated).~~

Of part of such works, the Applicant will submit a PRow Order as required by the Highways Act.

Signage and Information

~~5.1.7~~5.1.9 At all access, crossing, other as agreed points where the P~~ro~~W ~~routes~~ intersect with the ~~is effected by the~~ Scheme, appropriate signage and information, compliant with health & safety Regulations and best practice would be installed ~~provided~~ to inform P~~ro~~W users of the management and necessary safety procedures which the Applicant has put ~~are~~ in place.

~~5.1.8~~5.1.10 During construction activity, ~~s~~Signage will ~~also~~, where required~~applicable~~, provide information on any alternative routes or temporary diversions. The location and details of these signs ~~is to be~~ would be discussed and approved in writing by the local planning authority, agreed with P~~ro~~W and Highways officers at both CCC and BBC.

~~5.1.9~~5.1.11 A s a m i n i m u m , i information signs detailing work activity, the ~~s~~ and giving the project Community Liaison Officer's contact number details, and other emergency contact information as is required will be erected and maintained across the Site during the Scheme's construction activity..

~~5.1.10~~5.1.12 The draft DCO ~~[EN010141/DR/3.1]~~ provides the undertaker with powers to authorise the permanent use of motor vehicles on the public rights of way defined in Part 2 of Schedule 6 to the draft DCO. Subject to the need to obtain the consent of the street authority, it also contains a general power for the undertaker to authorise the use of motor vehicles on streets and public rights of way temporarily under article 15(1)(b). When exercising these powers, the Applicant would ensure that appropriate signage is erected to warn P~~ro~~W users that motor vehicles may also be using the P~~ro~~W.

Commented [PD30]: Not supported

Site Construction Staff Safety Notifications

~~5.1.11~~5.1.13 The details of all P~~ro~~W management procedures which are in place will be included on the site safety briefing note to ensure that all site personnel are aware of the changes to the P~~ro~~W and exercise caution in these areas to protect P~~ro~~W users.

~~5.1.12~~5.1.14 New and temporary site personnel will also be briefed on these changes

Commented [PD31]: Correct heading - should be about how safety of P~~ro~~W users is ensured by all Scheme staff.

~~to the PRow to make sure that they are aware of where members of the public may be and to exercise caution in these areas to protect PRow users.~~

6.0 MANAGEMENT OF PROW DURING THE CONSTRUCTION PHASE

Commented [PD32]: The Council currently does not respond to this Chp as the principle of powers is NOT supported

6.1 Overview

- 6.1.1 The following section details the proposed procedures to be implemented during the construction phase to control the interface between PRow users and construction traffic and operations.
- 6.1.2 The specific management procedures that are proposed during the construction phase for each of the impacted PRow routes are described below. These descriptions should be read in conjunction with the relevant sheets of the **Street Works, Rights of Way, and Access Plan [EN010141/DR/2.4]**.
- 6.1.3 Unless there is an existing defensible barrier (e.g. hedgerow, ditch or existing stock fence), safety fencing (potentially in the form of the final perimeter fencing) will be erected along sections of PRow which run through the Site, and which are contiguous with the construction area.

6.2 Bedford Pertenhall 2 (Footpath 2)

- 6.2.1 The Pertenhall 2 footpath crosses the Site within the northern parcel of Site A to the west of Chadwell End. Immediately to the west of Chadwell End the PRow takes two separate paths, both labelled as Pertenhall 2. One (referred to here as Pertenhall 2(a)) runs along the southern side of Pertenhall Brook as far as the northern end of the Pertenhall 29 footpath, before crossing the brook and continuing along the northern side. A separate path (referred to here as Pertenhall 2(b)) runs west from Chadwell End along the northern side of Pertenhall Brook. This section runs largely outside of the Order Limits apart from an approximately 40m at its western end.
- 6.2.2 A landscaped buffer zone is proposed to preserve the existing routes of the PRow within the Order Limits, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period.

However, approximately 15m of the Pertenhall 2(a) footpath where it crosses the Pertenhall Brook would be used by construction traffic. A single crossing point would also be required across the Pertenhall 2(b) footpath.

- 6.2.3 The section of site access track which impacts on the Pertenhall 2 footpath only serves the northernmost parcel of Site A. As such, the frequency of construction traffic along this route would be relatively low for the majority of the construction period.
- 6.2.4 It is therefore proposed that warning signage would be placed along the PRow in the vicinity of the Pertenhall Brook crossing (Point 1 on Sheet 1) to advise PRow users to be aware of the presence of construction traffic. During periods of intense construction activity, a banksman could also be deployed at Point 1 to marshal vehicle movements across the Pertenhall Brook if required.
- 6.2.5 There would also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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. It is proposed that a new open span crossing of Pertenhall Brook would be constructed for cabling and access. As such, there would be no impact from the works on the existing brook crossing.

6.3 Bedford Pertenhall 18 (Footpath 18)

- 6.3.1 The Pertenhall 18 footpath runs generally outside of the Site area. As such, there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single crossing point would be required across the Pertenhall 18 footpath.

Commented [PD33]: Warning signage: the Host Authorities welcome the introduction of proposed warning signage for vehicles approaching crossing points over PRow. However, give way markings should also be provided to ensure that vehicles are encouraged to come to a stop before crossing PRow. This is particularly relevant if there are locations where visibility of potential PRow users is restricted meaning drivers are unable to make a judgement on whether or not it is safe to cross the PRow without first coming to a halt. (CCC, BBC)

- 6.3.2 The site access track at this crossing point comprises an existing farm access road, and as such the PRow already crosses a route used on a regular basis by large agricultural vehicles. There is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.3.3 Since there will be an increase in the volume of traffic using the existing access road during the construction phase it is proposed that warning signage would be placed on each side of the PRow crossing (Point 5 on Sheets 1 and 3) to advise PRow users to be aware of the presence of construction traffic.
- 6.3.4 There would also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.4 Bedford Pertenhall 26 (Bridleway 26)

- 6.4.1 The Pertenhall 26 bridleway comprises a length of approximately 320m, which connects to the northern end of the Bolnhurst and Keysoe Bridleway 40. The full length of this would be used as a construction access road, with construction vehicles required to travel along the PRow. As such, it would be necessary to implement measures to avoid conflicts between users of the PRow and construction traffic.
- 6.4.2 The site access track along the Pertenhall 26 bridleway comprises an existing farm access road, and as such the PRow already follows a route used on a regular basis by large agricultural vehicles. The access road comprises a width of approximately 4.5-5m along the impacted section of the PRow, along with a grass verge that varies between 1 and 3m wide, and as such there is generally sufficient width for PRow users to safely pass vehicles approaching in the opposite direction. Temporary fencing could be provided to segregate PRow users from construction traffic.

Commented [PD34]: Significant concern raised for equestrian user safety - use of Bridleway for Scheme's vehicle traffic NOT supported.

6.4.3 Since there will be an increase in the volume of traffic using the existing access road during the construction phase it is proposed that warning signage would be placed at each end of the impacted route of the PRoW (Point 3 on Sheets 1 and 3 and Point 4-6 on Sheet 3) to advise PRoW users to be aware of the presence of construction traffic.

6.4.4 During periods of intense construction activity, PRoW users could be further protected through the deployment of banksmen at Point 3 and Point 4 to marshal vehicle movements along the Pertenhall 26 bridleway if required.

6.4.5 Warning signage would be placed at each end of the impacted route of the PRoW to advise PRoW users to be aware of the presence of construction traffic. Warning signage would also be provided to alert drivers that equestrian users could be using the route.

6.4.6 Equestrian users will be given right of way when using Pertenhall 26 bridleway. If a vehicle using Pertenhall 26 bridleway is approaching behind an equestrian user, the HGV driver must maintain a gap of approximately 50m to the equestrian user, which will be signed at each end of the route. If a vehicle using Pertenhall 26 bridleway meets an oncoming equestrian user, the vehicle must come to a stop no less than 50m from the equestrian user and wait for the user to safely pass, which will also be signed at each end of the route. Temporary marker posts will be installed at 50m intervals along the route such that drivers have a visual aid to judge a 50m separation.

6.4.7 Outside construction hours, there would be free use of the Pertenhall 26 bridleway by all PRoW users. Signage would be provided to inform PRoW users of the construction hours.

6.4.8 There may also be a need to protect PRoW users during the installation of internal cabling. Where it is necessary to install cabling across the PRoW route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period PRoW users would be

Commented [PD35]: There is a presumption on vehicles first on proposed effected PRoW - this in-principle is NOT supported.

Banksmen on BW26 are unable to obtain full visibility along the length which raised absolute safety concerns. (AQ)

The Council considers that a full closure is more appropriate for safety concerns on BW26 than signs and banksmen subject to Order notice. (AQ)

Commented [PD36]: Use of say Bridleway 112/7 and Footpath 112/8 'outside of construction hours'. Permitting use of the PRoW at different times of the day risks confusion for operatives and PROW users. Measures will need to be in place to ensure that during the hours of construction, the fact that sections of these PRoW are/ maybe closed to the public is made clear to all potential users. (CCC & BBC)

required to follow a localised diversion (in the order of a few metres either side of the existing PRow alignment) around the works site.

6.5 Bedford Pertenhall 29 (Footpath 29)

- 6.5.1 The Pertenhall 29 footpath comprises a length of approximately 455m. The full length of this would be used as a construction access road, with construction vehicles required to travel along the PRow. As such, it would be necessary to implement measures to avoid conflicts between users of the PRow and construction traffic.
- 6.5.2 The route of the PRow runs through open fields. As such, it is proposed that PRow users would be protected through the provision of a temporary PRow diversion. This would run through the field immediately adjacent to the existing alignment of the PRow between Point 1 on Sheet 1 and Point 2 on Sheets 1 and 3. Temporary fencing would be provided to segregate PRow users from construction traffic.
- 6.5.3 Warning signage would be placed at each end of the impacted route of the PRow to advise PRow users to be aware of the presence of construction traffic.
- 6.5.4 Outside construction hours, there would be free use of the Pertenhall 29 footpath by all PRow users. Signage would be provided to inform PRow users of the construction hours.
- 6.5.5 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.6 Bolnhurst and Keysoe 32 (Footpath 32)

- 6.6.1 The Bolnhurst and Keysoe 32 footpath crosses the Site within the northern parcel of Site A to the west of Green End. A landscaped buffer zone is proposed to preserve the existing route of the PRow. A section of access track would run parallel to the route of the PRow for a distance of approximately 280m, although this would be segregated from the PRow, with temporary fencing erected during the construction phase to prevent PRow users from venturing onto the access track. As such, there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single crossing point would be required across the Bolnhurst and Keysoe 32 footpath.
- 6.6.2 The route of the impacted section of the Bolnhurst and Keysoe 32 footpath runs through open fields and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.6.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 6 on Sheet 1) to advise PRow users to be aware of the presence of construction traffic.
- 6.6.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.7 Bolnhurst and Keysoe 35 (Footpath 35)

- 6.7.1 The Bolnhurst and Keysoe 35 footpath crosses the Site to the eastern side of Site A. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single crossing point would be required across the Bolnhurst and Keysoe 35 footpath.

- 6.7.2 The route of the impacted section of the Bolnhurst and Keysoe 35 footpath runs through open fields and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.7.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 11 on Sheet 3) to advise PRow users to be aware of the presence of construction traffic.
- 6.7.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.8 Bolnhurst and Keysoe 37 (Bridleway 37)

- 6.8.1 A 1,670m section of the Bolnhurst and Keysoe 37 bridleway would be used as a construction access road, with construction vehicles required to travel along the PRow. As such, it would be necessary to implement measures to avoid conflicts between users of the PRow and construction traffic.
- 6.8.2 The route of the PRow runs through open fields. As such, it is proposed that PRow users would be protected through the provision of a temporary PRow diversion. This would run through the field immediately adjacent to the north of the existing alignment of the PRow between Point 4 on Sheet 3 and Point 7 on Sheet 2. The temporary PRow alignment would then cross the access track at Point 7 and continue immediately adjacent to the south of the existing alignment between Point 7 and Point 9 on Sheet 2. Temporary fencing would be provided to segregate PRow users from construction traffic.
- 6.8.3 There would also be a need for a further 2no. crossing points across the Bolnhurst and Keysoe 37 bridleway at Points 8 and 10 on Sheet 2.

Commented [PD37]: Significant concern raised for equestrian user safety - use of Bridleway for Scheme's vehicle traffic NOT supported.

6.8.4 Warning signage would be placed at each end of the impacted route of the PRow and at each side of the PRow crossing points to advise PRow users to be aware of the presence of construction traffic. Warning signage would also be provided to alert drivers that equestrian users could be using the route, and to come to a stop when horses are passing.

6.8.5 Whilst equestrian users will be temporarily diverted into the field edge adjacent to the construction access road, if an HGV using Bolnhurst and Keysoe 37 bridleway is approaching ~~behind~~ an equestrian user, the HGV driver must maintain a gap of approximately 50m to the equestrian user, which will be signed at each end of the route. If an HGV using Bolnhurst and Keysoe 37 bridleway meets an ~~oncoming~~ equestrian user, the vehicle must come to a stop no less than 50m from the equestrian user and wait for the user to safely pass, which will also be signed at each end of the route. Temporary marker posts will be installed at 50m intervals along the route such that drivers have a visual aid to judge a 50m separation.

6.8.4 6.8.6 Outside construction hours, there would be free use of the Bolnhurst and Keysoe 37 bridleway by all PRow users. Signage would be provided to inform PRow users of the construction hours.

6.8.5 6.8.7 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.9 Bolnhurst and Keysoe 40 (Bridleway 40)

6.9.1 The Bolnhurst and Keysoe 40 bridleway crosses the Site to the western side of Site A. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single

Commented [PD38]: There is absolute safety concern for equestrian users that in some cases there will NOT be sufficient passing room and/or they will be diverted on a secondary, temporary route that is NOT acceptable as a route, demarcation, or surfacing. It is for this reason that the use of any bridleway for vehicle traffic related to the Scheme is NOT supported. (AQ)

Commented [PD39]: Significant concern raised for equestrian user safety - use of Bridleway for Scheme's vehicle traffic NOT supported.

crossing point would be required across the Bolnhurst and Keysoe 40
bridleway.

6.9.2 As such it is proposed that warning signage would be placed on each side of
the PRow crossing point (Point 8 on Sheet 2) to advise PRow users to be
aware of the presence of construction traffic.

~~6.9.2~~**6.9.3** During periods of intense construction activity, PRow users would be
further protected through the deployment of a **banksman** at Point 8 to marshal
vehicle movements along the intersection of the Bolnhurst and Keysoe 37
bridleway and Bolnhurst and Keysoe 40 bridleway, as required.

Commented [PD40]: We do not consider that
banksman can maintain safety at this location for users.
The topography does not allow for clear sight in both
directions along its length (AQ).

~~6.9.3~~**6.9.4** There may also be a need to protect PRow users during the installation
of internal cabling. Where it is necessary to install cabling across the PRow
route, this would be trenched beneath the surface in narrow sections. While
cabling works are in progress it is proposed that temporary fencing would be
erected to protect the works area. During this period 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.

6.10 Bolnhurst and Keysoe 13 (Footpath 13)

6.10.1 The Bolnhurst and Keysoe 13 footpath crosses the Site to the western side of
Site B. A landscaped buffer zone is proposed to preserve the existing route
of the PRow. A section of access track would run parallel to the route of the
PRow for a distance of approximately 670m, although this would be
segregated from the PRow, with temporary fencing erected during the
construction phase to prevent PRow users from venturing onto the access
track. As such, there would be no direct impact from construction traffic along
this PRow for the majority of the construction period. However, three separate
crossing points would be required across the Bolnhurst and Keysoe 13
footpath.

- 6.10.2 The route of the impacted section of the Bolnhurst and Keysoe 13 footpath runs through open fields and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.10.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing points (Point 13 on Sheet 3 and Sheet 4, Point 14 on Sheet 4 and Point 15 on Sheet 4) to advise PRow users to be aware of the presence of construction traffic.
- 6.10.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.11 Bolnhurst and Keysoe 47 (Footpath 47)

- 6.11.1 The Bolnhurst and Keysoe 47 footpath crosses the Site from east to west centrally within Site B. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, two crossing points would be required where access tracks cross the Bolnhurst and Keysoe 47 footpath.
- 6.11.2 The route of the impacted section of the Bolnhurst and Keysoe 47 footpath runs through open fields and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.11.3 As such it is proposed that warning signage would be place on each side of the PRow crossing points (Point 16 and Point 17 on Sheet 4) to advise PRow users to be aware of the presence of construction traffic. Temporary fencing would be provided to segregate PRow users from construction activities as required.

6.11.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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

6.12 Little Staughton 1 (Footpath 1)

6.12.1 The Little Staughton 1 footpath crosses the Site to the eastern side of Site B. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single crossing point would be required across the Little Staughton 1 footpath.

6.12.2 The route of the impacted section of the Little Staughton 1 footpath runs through open fields and there is good visibility of the PRow crossing point for both drivers and PRow users.

6.12.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 23 on Sheet 5 and Sheet 7) to advise PRow users to be aware of the presence of construction traffic.

6.12.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.13 Little Staughton 4 (Footpath 4)

- 6.13.1 The Little Staughton 4 footpath crosses the Site to the southern side of Site B. A landscaped buffer zone is proposed to preserve the existing route of the PRow. A section of access track would run parallel to the route of the PRow for a distance of approximately 150m, between Point 19 and Point 20 on Sheet 6. This would be segregated from the PRow, with temporary fencing erected during the construction phase to prevent PRow users from venturing onto the access track. Other than this there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, two crossing points would be required where access tracks cross the Little Staughton 4 footpath.
- 6.13.2 The route of the impacted section of the Little Staughton 4 footpath runs through open fields and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.13.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing points (Point 21 and Point 22 on Sheet 6) to advise PRow users to be aware of the presence of construction traffic.
- 6.13.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.14 Little Staughton 8 (Footpath 8)

- 6.14.1 The Little Staughton 8 footpath crosses the Site from east to west centrally within Site B. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single crossing point would be required across the Little Staughton 8 footpath.

- 6.14.2 It is proposed that warning signage would be placed on each side of the PRow crossing point (Point 18 on Sheet 4, Sheet 5 and Sheet 6) to advise PRow users to be aware of the presence of construction traffic.
- 6.14.3 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.15 Little Staughton 26 (Footpath 26)

- 6.15.1 The Little Staughton 26 footpath crosses the Site to the western side of Site B. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, a single crossing point would be required across the Little Staughton 26 footpath.
- 6.15.2 The route of the impacted section of the Little Staughton 26 footpath runs through an open field and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.15.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 12 on Sheet 3) to advise PRow users to be aware of the presence of construction traffic.
- 6.15.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.16 Great Staughton 2 (Footpath 213/2)

- 6.16.1 The Great Staughton footpath 213/2 runs along the western edge of Site C. A landscaped buffer zone is proposed to preserve the existing route of the PRow, and there would be no direct impact from construction traffic along this PRow for the majority of the construction period. However, 2no. crossing points in close proximity to each other would be required across the Great Staughton footpath 213/2.
- 6.16.2 The route of the impacted section of the Great Staughton footpath 213/2 runs through open fields and there is good visibility of the PRow crossing points for both drivers and PRow users.
- 6.16.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing points (Point 24 on Sheet 7 and Sheet 8) to advise PRow users to be aware of the presence of construction traffic.
- 6.16.4 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.17 Hail Weston 7 (Bridleway 112/7)

- 6.17.1 The Hail Weston bridleway 112/7 crosses the Site from east to west centrally within Site D. A 280m section of the PRow would be used as a construction access road, with construction vehicles required to travel along the PRow. As such, it would be necessary to implement measures to avoid conflicts between users of the PRow and construction traffic.
- 6.17.2 The route of the PRow runs through open fields. As such, it is proposed that PRow users would be protected through the provision of a temporary PRow

Commented [PD41]: Significant concern raised for equestrian user safety - use of Bridleway for Scheme's vehicle traffic NOT supported.

diversion. This would run through the field immediately adjacent to the south of the existing alignment of the PRow between Point 25 and Point 26 on Sheet 10. Temporary fencing would be provided to segregate PRow users from construction traffic.

- 6.17.3 PRow users would be required to cross the access track at Point 25 and Point 26. Warning signage would be placed at each end of the impacted route of the PRow at these crossing points to advise PRow users to be aware of the presence of construction traffic. Warning signage would also be provided to alert drivers that equestrian users could be using the route, and to come to a stop when horses are passing.
- 6.17.4 The Hail Weston bridleway 112/7 also crosses the alignment of the grid connection at the eastern edge of Site D. A single crossing point would therefore be required across the PRow.
- 6.17.5 Construction traffic movements associated with the installation of the grid connection would be relatively infrequent and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.17.6 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 27 on Sheets 10 and 11) to advise PRow users to be aware of the presence of construction traffic.
- 6.17.7 Outside construction hours, there would be free use of the Hail Weston bridleway 112/7 by all PRow users. Signage would be provided to inform PRow users of the construction hours.
- 6.17.8 There may also be a need to protect PRow users during the installation of internal cabling and the grid connection cable across the route of the PRow. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.18 Hail Weston 8 (Footpath 112/8)

- 6.18.1 The Hail Weston footpath 112/8 crosses the Site to the western side of Site D. A landscaped buffer zone is proposed to preserve the existing route of the PRow. A section of access track would run parallel to the route of the PRow for a distance of approximately 410m, although this would be segregated from the PRow, with temporary fencing erected during the construction phase to prevent PRow users from venturing onto the access track. Other than this there would be no direct impact from construction traffic along this PRow for the majority of the construction period.
- 6.18.2 The route of the PRow runs through open fields. As such, it is proposed that PRow users would be protected through the provision of a temporary PRow diversion. This would run through the field immediately adjacent to the east of the existing alignment of the PRow between Point 25 on Sheet 10 and Point 28 on Sheets 10 and 11. Temporary fencing would be provided to segregate PRow users from construction traffic.
- 6.18.3 Warning signage would be placed at each end of the impacted route of the PRow to advise PRow users to be aware of the presence of construction traffic.
- 6.18.4 Outside construction hours, there would be free use of the Hail Weston footpath 112/8 by all PRow users. Signage would be provided to inform PRow users of the construction hours.
- 6.18.5 There may also be a need to protect PRow users during the installation of internal cabling. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in narrow sections. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period PRow users would be

Commented [PD42]: It is unclear why a temporary PRow diversion is required (para 6.18.2) when in para 6.18.1 it is stated that construction traffic will have no direct impact on Footpath 112/8. (CCC & BBC)

required to follow a localised diversion (in the order of a few metres either side of the existing PRow alignment) around the works site.

6.19 Hail Weston 5 (Footpath 112/5)

- 6.19.1 The Hail Weston footpath 112/5 crosses the alignment of the grid connection to the south-east of the B645. A single crossing point would therefore be required across the Hail Weston footpath 112/5.
- 6.19.2 Construction traffic movements associated with the installation of the grid connection would be relatively infrequent and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.19.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 29 on Sheet 11) to advise PRow users to be aware of the presence of construction traffic.
- 6.19.4 There may also be a need to protect PRow users during the installation of the grid connection cable across the route of the PRow. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in a narrow section. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.20 Staploe 16 (Footpath 16)

- 6.20.1 The Staploe 16 footpath crosses the alignment of the grid connection to the north of Duloe Lane. A single crossing point would therefore be required across the Staploe 16 footpath.
- 6.20.2 Construction traffic movements associated with the installation of the grid connection would be relatively infrequent and there is good visibility of the PRow crossing point for both drivers and PRow users.

- 6.20.3 As such it is proposed that warning signage would be place on each side of the PRow crossing point (Point 30 on Sheet 12) to advise PRow users to be aware of the presence of construction traffic.
- 6.20.4 There may also be a need to protect PRow users during the installation of the grid connection cable across the route of the PRow. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in a narrow section. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.21 Staploe 4 (Footpath 4)

- 6.21.1 The Staploe 4 footpath crosses the alignment of the grid connection to the south of Duloe Lane. A single crossing point would therefore be required across the Staploe 4 footpath.
- 6.21.2 Construction traffic movements associated with the installation of the grid connection would be relatively infrequent and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.21.3 As such it is proposed that warning signage would be place on each side of the PRow crossing point (Point 31 on Sheet 13) to advise PRow users to be aware of the presence of construction traffic.
- 6.21.4 There may also be a need to protect PRow users during the installation of the grid connection cable across the route of the PRow. Where it is necessary to install cabling across the PRow route, this would be trenched beneath the surface in a narrow section. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

6.22 Staploe 8a (Footpath 8a)

- 6.22.1 The Staploe 8a footpath crosses the alignment of the grid connection close to the point of connection to the west of the Eaton Socon substation. A single crossing point would therefore be required across the Staploe 8a footpath.
- 6.22.2 Construction traffic movements associated with the installation of the grid connection would be relatively infrequent and there is good visibility of the PRow crossing point for both drivers and PRow users.
- 6.22.3 As such it is proposed that warning signage would be placed on each side of the PRow crossing point (Point 32 on Sheet 14) to advise PRow users to be aware of the presence of construction traffic.
- 6.22.4 There may also be a need to protect PRow users during the installation of the grid connection cable across the route of the PRow. While cabling works are in progress it is proposed that temporary fencing would be erected to protect the works area. During this period 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.

7.0 MANAGEMENT OF PROW AND PERMISSIVE PATHS ACCESS DURING THE OPERATIONAL PHASE

Commented [PD43]: Then Permissive Paths should also be referenced in the Construction Phase.
Note: DCO defines it as 'Permissive Paths'

7.1 Responsibilities

Commented [PD44]: As taken from EN010170 Green Hill NSIP PROWMP (March 26).

7.1.1 Landowner responsibilities for maintaining the use of PROWs within the Scheme will be transferred to the Operator under the agreements for the use of the land, or as part of the transfer of land in the event compulsory acquisition powers are used. The final PROWPPMP as secured by Requirement xx in Schedule x to the Draft DCO [REPx] will confirm the Operator's maintenance responsibilities. Within the Cable Route Corridor, the Operator will be responsible for reinstating the surface of any PROW disturbed by construction and/or use by the Scheme, after which responsibility for maintenance will revert to the existing landowner.

7.1.2 These responsibilities include: keeping PROWs clear from physical obstruction; ensuring vegetation does not encroach on the route from the side or above, including at hedgerow gaps between fields; ensuring waymarking is clear and unambiguous; warning signs are clear and used where necessary; and ensuring that access structures such as gates or bridges are in safe condition and are easy to use.

7.1.3 Where PROWs meet the public highway adjacent to land under freehold acquisition by the Applicant, agreement of responsibilities and requirements for vegetation clearance for visibility will be agreed with the highway authority.

7.4

7.2 Public Rights of Way

7.2.17.1.4 During the ~~duration of the Scheme~~operational phase, all public rights of way and permissive ~~paths/routes~~ within the Order Limits would be kept maintained to ensure un-restricted and ~~un-free from~~ obstructed access ~~in~~. In this regard, the Scheme~~The Site~~ makes provision for, as a minimum, a 20-meter ~~wide~~ layout includes for a 10m PROW buffer and landscape corridor to all PROWs and permissive paths ~~treatment to preserve routes through the Site~~.

Commented [PD45]: [APP-034] para 5.6.74 states 20m wide. See technical spec response further. (AQ)

Commented [PD46]: Not within Applicant's gift.

It should not state that no closures are required, as some are needed to retain cohesion of the network during the construction phase. There should be a statement covering this in the construction phase section. (AQ)

7.2.27.1.5 There would be no requirement to implement any ~~permanent~~ closures or diversions of any of the PROW routes and permissive paths that interact with the Order Limits.

Commented [PD47]: What about replacement works?

7.2.37.1.6 The definitive ~~widths~~ of public rights of way and permissive path corridors

Commented [PD48]: Definitive widths for each PROW should be agreed and stated in the DCO. Some Definitive Map and Statement (DMS)s are silent. Defining the width of a PROW would be considered a Scheme enhancement and aids maintenance, management and enforcement. (PD & AQ)

~~as defined in 4.4 will be maintained for the duration during the operational phase of the Scheme. Public rights of way within the Order Limits are shown on the Street Works, Rights of Way and Access Plan [EN010141/DR/2.4].~~

7.2.47.1.7 Where public rights of way and permissive paths are within areas identified as grassland on the Illustrative Landscape Proposals at Appendix A of the outline Landscape and Ecological Management Plan [EN010141/DR/7.7], a strip of grassland will be cut to a minimum width of 2m, or in accordance with the definitive width of the public right of way and permissive paths, whichever is wider. These strips will be maintained such that the grasses do not exceed 150mm by regular cutting across the summer months. The purpose of these cuts is to ensure clear wayfinding across the Site and promote safety of usage.

7.2.57.1.8 Any temporary closures or diversions to public rights of way and permissive paths during the Operational Phase to provide for maintenance activities ~~would need to be submitted to the local planning authority for written approval prior to undertaking such closure and/or diversions, be agreed with CCC or BBC as applicable, but at this time none are expected.~~

7.37.2 Permissive Paths Access

7.3.17.2.1 Permissive paths will be provided at locations within East Park Sites B and C as identified on the Illustrative Landscape Proposals drawing at Appendix A

Within EN010170 Green Hill NSIP (March 26) oPRoWMP the exact use of the Permissive Path is stated which then informs the technical specification; e.g. 'Permissive path for pedestrians, cyclists and horse riders....'

Management of Permissive Path Users

7.2.2 Signage is to be placed at the point each permissive path is accessed from a public highway or public right of way, showing the route, and type of user permitted to use that route. This will be limited to any one or combination of pedestrians (as defined by the Highway Code), pedal cyclists (including

Commented [PD49]: This paragraph notes the circumstances under which the operator will rectify defects on the affected PROW during the operation of the development. This paragraph should be expanded to include completion of defect repairs within the Operator's control where not unreasonably requested by the local highway authority. (CCC & BBC)o

Commented [PD50]: It is acknowledged that the Applicant has added additional paragraphs to this in REP3.

There is the concern that Permissive Access/Routes/ Paths sits across the oPRoWMP and oLEMP with no clarity provided in either regarding technical specification, etc.

Would suggest that Permissive Routes is addressed in only one MP.

Resolve name: Permissive Access/Routes/ Paths?

Unable to current find permissive routes on Appendix A. (AQ)

Commented [PD51]: As taken from EN010170 Green Hill NSIP PRoWMP (March 26).

electrically assisted pedal cycles that comply with The Electrically Assisted Pedal Cycles (Amendment) Regulations 2015), and horse riders. Signage on permissive paths will also give notice for cyclists to give way to pedestrians and horse riders when passing along permissive paths.

7.2.3 The provided signage will furthermore give contact details of the Scheme's Operator and Community Liaison Manager, to report anti-social behaviour or misuse of the permissive paths. Relevant emergency and non-emergency services phone numbers should also be displayed to report antisocial behaviour or misuse that is a danger to other permissive path users or interfering with site security.

7.2.4 Access arrangements for all permissive paths where they meet the public highway or public rights of way will be confirmed with the relevant local highway authority in the final PRoWMP as secured by Requirement xx in Schedule x to the Draft DCO [REPxx]. Where ongoing antisocial behaviour is detrimental to the enjoyment or safety of users during the operational lifetime of the Scheme, the Applicant will discuss with the local authority the implementation of any required preventative measures such as barriers or gates to restrict unpermitted access. If antisocial behaviour or misuse of the permissive paths cannot be addressed sufficiently and there are repeated safety concerns for users or breaches of site security, the Applicant may, as a last resort, revoke access along these permissive paths.

7.2.5

Chp x Decommissioning Phase

Commented [PD52]: The MP should set out approach/ measures/ strategy/ maintenance etc during the Decommissioning Phase which could last upto 5-years.

What is the state of the PRoWs?
What is the state of Permissive Routes?

Refer to EN010170 Green Hill NSIP PRoWMP (March 26) Chp5 for reference.

of the outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]. The route of each permissive path to be provided along with the length of route and proposed access rights to be granted is set out in Table 2 of the oLEMP.

7.3.27.2.6 The final route, surfacing material and widths of proposed permissive paths will be defined in the final LEMP.

Commented [PD53]: Outline spec to be provided prior to consent

7.3.27.2.7 It is proposed that new permissive pathways would be created within Site B, to link up existing routes and enhance appeal to users and to improve connectivity. The final route, surfacing material, permitted user groups and widths of proposed permissive paths will be defined in the full PRow Management Plan. Should the permissive paths/routes result in antisocial behaviour which negatively impacts users of the Site (as formally notified to the police or other local authority), has the potential to harm wildlife (as evidenced by the Applicant to the local authority) or to the security of the Proposed Development Scheme (as formally notified to the police), then the permissive paths could be may be removed, following consultation and written approval from with the Local Planning Authority.

Commented [PD54]: In principle, the suggestion for closure is not acceptable (DA)

7.2.8 Any permanent repairs and/or maintenance works to the PRow surfaces should be submitted to the LPA for prior written approval and should accord with the technical specification as agreed in the oPRowMP.



8.0 IMPLEMENTATION OF MANAGEMENT PLAN

8.1.1 The final PROWMP will define the responsibilities, roles and actions required for implementation of the measures set out in this oPROWMP during both the construction and operational phases. A final PROWMP will be prepared prior to each relevant phase of the authorised development, in substantial accordance with this pPROWMP.

Commented [PD55]: The actions need to indicate once-off, annual, or say immediate if reported - say 'potholes')

8.1.2 The final PROWMP will include, as a minimum:

- **Objectives**
- the team roles and responsibilities, and the named individuals fulfilling those roles, supported by an organogram and contact directory;
- procedures for internal monitoring, inspection and reporting in relation to PRoW management measures;
- procedure for external monitoring, Condition surveys, and reporting to local planning authority/ highway authority.
- document control systems and procedures;
- the communication strategy for stakeholders and third parties, including arrangements for responding to PRoW user queries;
- training and briefing arrangements to ensure that relevant staff and site operatives are aware of PRoW control requirements and procedures;
- measures to ensure staff and personnel are advised of changes to circumstances as works progress; and
- procedures for emergencies affecting PRoW.

Commented [PD56]: Two plans may delay works on site due to planning approvals; suggest one MP

Commented [PD57]: 8.1.2 strongly supported

9.0 MONITORING, RECORD KEEPING AND REVIEW

9.1 Monitoring

9.1.1 To ensure and demonstrate compliance with the final PROWMP, monitoring and reporting will take place throughout the construction and operational phases ~~in relation to PRow management~~. Monitoring will include oversight of reporting to ensure that corrective action is taken where necessary. Details of monitoring, inspection and audits will be set out in the final PROWMP.

Commented [PD58]: The Council acknowledge the additional paragraphs in REP3 against monitoring to address inspections and broadly suggest that these need more (SMART) clarity.

9.2 Record Keeping

9.2.1 Where complaints are received from members of the public relating to PRow or permissive ~~paths access~~ (including accessibility, signage, surfacing condition or perceived safety), these will be logged in a record keeping system and reviewed, in accordance with the framework of environmental management plans every quarter for the duration of the Scheme ~~for each phase of the authorised development~~.

Commented [PD59]: Reviewed, assessed and resolved. The logs are to be reported to the LHA every quarter. (AQ)

9.2.2 Records will be made available for the purposes of monitoring compliance with the final PROWMP upon request by the relevant authorities.

9.3 Review

~~7.2.4~~ 9.3.1 The final PROWMP will be reviewed at regular intervals and as required to respond to specific issues that may arise (including changes in construction phasing, unforeseen circumstances, monitoring outcomes, or PRow user feedback). Where the review identifies the need for additional control measures or mitigation, or amendments to existing measures, these will be progressed through the approval mechanism set out in Requirement 11 of the DCO.

Commented [PD60]: Enforcement measures



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 8 July 2026
Ref: EPE 23-02405LPA/2.10D4

RESPONSE TO DEADLINE 4 Review of [APP-161] [REP3-060] outline Soil Management Plan

Dear Sir,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141).

BBC Reference No.: 25/01836/DCO | Examination Ref. [REDACTED]

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: The Proposed Development comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Proposed Development also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) ([REDACTED]@bedford.gov.uk) ([REDACTED]@bedford.gov.uk) (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Planning Committee Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]

Date: 8 July 2026

[REDACTED]: Head of Planning and Building Control

Craig Austin, Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

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1.0 INTRODUCTION

1.1 Context of this Report

- 1.1.1 This report is prepared by Bedford Borough Council (the 'Council') in response to a review by the Host Authorities of the Applicant's [APP-161] [REP3-060] outline Soil Management Plan; in response to matters raised by the Host Authorities (for example within the Local Impact Reports) regarding matters/ issues to deal with soil management; and, is submitted as part of Deadline 4 (10 July).
- 1.1.2 To aid reading, the Council's central observations are set out below, with a more detailed review and commentary of the Management Plan set out as track changes and/or comments within the Applicant's Management Plan itself, attached as an Appendix.
- 1.1.3 Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submitted under separate cover for individual procedural sign-off purposes.
- 1.1.4 This review remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification within any further updated submitted material or similar to the Examination. The Council remains open to discussion.
- 1.1.5 This Report is solely that of Bedford Borough Council, submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

1.2 Council's Review and Observations

- 1.2.1 **Observation 1:** in terms of all Management Plans these should address and be structured along the lines of/ be: Specific; Measurable; Achievable; Relevant; Time-bound: i.e. SMART. Currently this universal management approach/ tool is not evident.
- 1.2.2 **Observation 2:** the Soil Management Plan (SMP) needs to be both a 40-year 'live' workable document for the Operator on site in order to secure the objectives as assessed in the Environmental Statement; enable clear commitments to the management and maintenance of the soil; and, the SMP needs to be framed within the planning requirements of the NPS EN-1 (ALC) to enable monitoring and enforcement of such requirements over the duration of the Schemes, including ALC commitments made regarding post-decommissioning. It is suggested that the SMP is light in these matters; i.e. it lacks a strong frame of reference.
- 1.2.3 With reference to the [APP-016 *etal*] draft DCO Agreement, Schedule 2 (Requirements) Part 1 (7): -
- 1.2.4 **Observation 4:** *'(1) No phase of the authorised development may commence until a soil management plan for that phase has been submitted to and approved by the local planning authority in consultation with Environment Agency'.*

It is noted that this commitment is not set out against each phase in Chp 5 'Soil management by project phase' of the Management Plan. In some cases, surveys may need to be undertaken in the previous phase to inform the preparation of the next phase's Soil Management Plan.

1.2.5 **Observation 5:** under the overarching NPS EN-1, operators of NSIP schemes must include an outline soil decommissioning and restoration management plan. While specific restoration timeframes are heavily dependent on the Applicant's Environmental Statement, national guidance require agricultural lands to be restored to acceptable conditions within a typical one to five-year post-decommissioning monitoring period.

- a) The Operator will therefore need to undertake a final survey and prepare a final SMP to evidence that the soil is brought back to the baseline ALC requirement, to be submitted to the Council for written approval, prior to the Site being handed-over back to the landowner.
- b) It is this report and approval that determines the completion of the Scheme. It is therefore suggested that the Operator may need to include for extended flexibility within the Decommissioning Phase across all management plans, rather than rely on the statement [APP-038] The Scheme para2.7.5 '*Decommissioning is expected to take between 12 and 24 months and would be undertaken in phases*'.

1.2.6 **Observation 6:**

- (2) *The soil management plan must be in substantial accordance with the outline soil management plan to the extent that it is applicable to that phase.*
- (3) *Each phase of the authorised development must be carried out in accordance with the approved soil management plan for that phase.*

In this regard, the Applicant has not set out in any detail:

- a) Typical management and maintenance activities than may/will occur to retain and/or enhance soil quality during the Operational Phase - the Council's track-changes (at 5.4.2) sets out an indicative framework of issues/ works that should be addressed within each phase. Additional detail would as a minimum include say soil storage locations, estimates of volumes, removal of spoil/ contaminated soil not identified previously, etc. Additional information could and should be added at any phase of the Scheme's life, such as when research results become available (as monitored by the Operator) – this broader intent/ commitment to works should be reflected in the SMP.
- b) While the Applicant proposes setting up an Agrisolar research area ([APP-038] Work No. 10) – which is strongly supported by the Council - it is unclear how any such research and/or findings can then be used to contribute to soil quality etc. The Applicant is silent on this matter.
- c) The Applicant references [APP-038] para 2.4.16 how '*sheep grazing on solar farms is successfully used in the UK and carries with it multiple benefits such as maintaining agricultural output from the land, soil health improvement and...*' but does not set out a methodology to evidence that for the 40-year Operational Phase such benefits are incurred (In this regard, the arrangement and management of the sheep has not been set out in any documentation by the Applicant).
- d) While the DCO required the Council to approve the final SMP that will '*be in substantial accordance with the outline*' currently the Council does not have sufficient clarity of intent to review the outline SMP (refer to track-changes).

1.2.7 **Observation 7:** it terms of SMART, the SMP needs to set out fixed outcomes related to say ALC compliance; work methods/ objectives so that the Operator understand the long-term ambition/measurable objectives; remedial actions if required; and measures/ recourse for for non-compliance and correction measures. This is not addressed in the current SMP.

1.2.8 It is explicitly noted by the Council that the Applicant/ Operator will need some flexibility

in preparing the SMP, but for all phases some broad intent is required.

1.2.9 **Observation 8:** it should be noted that the SMP form a compliance document for planning purposes and consequently the SMP should address how the Council will be able to monitor and enforce such commitments (with potential financial and/or stop-work penalties). This lack of stated recourse remains a concern for the Council.

1.2.10 **Observation 9:** the Applicant has committed to preparing supporting report to the SMP – the Council has listed these out as Appendixes. Drafts of intent or similar should be submitted within the Examination period for the Council’s review as the Applicant is asking for endorsement from the Council on such on the basis of ‘*in substantial accordance with the outline*’.

a) Outline Construction Soil Management Plan (Ref. DCO Sch2(1)(7) & BBC Matter 81)

b) Outline Decommissioning Soil Management Plan (Ref. oDEMP [REP1-038] & BBC Matter 81)

c) Materials Management Plan (Ref. oSMP [REP1-045] para 8.1.4)

1.2.11 **Observation 10:** General observation – all actions/ statements/ Applicant’s undertakings, et al should be phrased within the Management Plans as an intent (*will*) rather than as an option (*may*).

1.2.12 The Council has undertaken an extensive review of the Technical Note and the various Management Plan – these reviews should be read both in the singular and as a collective review across the suite of inter-related documents.

2. CONCLUSIONS

2.1 As currently tabled and as reviewed by the Council, the [REP3-060] et al outline Soil Management Plan (oSMP) is lacking detail, clear commitments, and assurances as would be required of a long-term (40-year) management strategy. On this basis, the oSMP is NOT Supported.

PD-QA/5pg end

Appendix A: [REP3-060] outline Soil Management Plan – Track Changes



EAST PARK ENERGY

East Park Energy

EN010141

Outline Soil Management Plan

[APP-161] [REP1-044/045] & [REP3-060]

BBC/HA Review (8 July/ Deadline 4):

Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submit under separate cover for individual procedural sign-off purposes.

This review, as attached to a cover letter, remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification as set out in the review below within any further updated submitted material or similar to the Examination.

The review is submitted without prejudice and the Council reserve the right to comment further as may be necessary.

The reference to 'Council' (singular) should be read interchangeably with the term 'Host Authorities' (plural).

BBC/ Host Authority's Review (7 July/ Deadline 4)

Commented [PD1]: A cursory review suggests that this needs clarity regarding each phase of works rather than a broad generic approach.
The oSMP requires committed intent; it is too generic to be enforceable against specific stds etc.

Document Reference: EN010141/DR/7.9

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

September 2025**April 2026**

Version ~~P01~~P02

EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Outline Soil
Management Plan

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/7.9
Author:	Axis PED Ltd / Reading Agricultural Consultants Ltd

Version	Date	Status
P01	September 2025	DCO Submission
P02HA	10 July April 2026	Deadline 44

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Table 2-1 ALC Grades within the East Park Energy Site

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A. Outline Construction Soil Management Plan (Ref. DCO Sch2(1)(7) & BBC Matter 81)

B. Outline Decommissioning Soil Management Plan (Ref. oDEMP [REP1-038] & BBC Matter 81)

C. Materials Management Plan (Ref. oSMP [REP1-045] para 8.1.4)

COUNCIL'S OBSERVATIONS:

The Applicant is referred to the Cover Letter: Response to Deadline 4 – review of [APP-161] outline Soil Management Plan (7 July) which sets out the executive observation of the Council's review on this Management Plan.

Commented [PD2]: We note the comment that this may be prepared post Examination but the HAs need a framework/ chps/ intent etc of what these documents may address. Current approach is not acceptable.

Commented [PD3]: We understand that a MMP is a document that details how excavated soils, aggregates, and other earthworks are handled, treated, and reused on a construction or development site. Its primary purpose is to safely reuse materials while avoiding strict, time-consuming waste regulations, and cross-contamination of soils.

However, Applicant should set out as a minimum a draft statement & structure of the MMP for the HA's in-principle acceptance.

1.0 INTRODUCTION

1.1 Purpose of this Document

1.1.1 This outline Soil Management Plan (oSMP) sets out the framework and principles for managing soil resources and excavated materials during the construction, operation, and decommissioning phases of the East Park Energy project (the Scheme).

1.1.2 This oSMP is a control document that will be ~~certified as part of the Development Consent Order (DCO) and~~ implemented via a requirement in Schedule 2 (Part 1, Article 7) of the draft DCO [EN010141/DR/3.1]. Should the Scheme be consented, the DCO will require that a final Soil Management Plan (SMP) is prepared and approved by the Local Planning Authorities prior to site preparation works and construction work~~construction of the construction~~ phase. The final SMP will need to be in substantial accordance with the oSMP.

1.1.3 The oSMP describes how soils will be protected, handled, stored, reused and restored in accordance with best practice, and how materials (including any potentially contaminated soils) will be managed or disposed of in compliance with relevant legislation. The aim is to avoid and minimise adverse effects on soil quality, agricultural land, and the environment throughout the project Scheme's lifecycle.

1.1.4 The oSMP is informed by established industry best practice guidance on soil handling and protection including:

a) ~~The~~ Department for Environment, Food and Rural Affairs (Defra) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009);

b) ~~The and the~~ Ministry of Agriculture, Fisheries and Food (MAFF) Good Practice Guide for Handling Soils (2000)⁴; ~~as well as the~~

c) Contaminated Land: Applications in Real Environments (CL:AIRE) Definition of Waste: Development Industry Code of Practice (DoWCoP) for material reuse⁹.

Commented [PD4]: In terms of all Management Plans these should address and be structured along the lines of/ be:

1. Specific
2. Measurable
3. Achievable
4. Relevant
5. Time-bound

i.e SMART

Commented [PD5]: This is not applicable to all Phases

Commented [PD6]: To align with wording in DCO

Commented [PD7]: There was the statement that the Applicant would prepare an outline Decommissioning Soil Management Plan

Commented [PD8]: Clarity needed regarding Requirement 7 wording that that there may be more than one oSMP submitted specific to different construction phases/phasing areas as briefly mentioned on in Chp8 (Consultation & Approvals) and that the oSMP may be tailored depending on phase. (LP)

- d) BS 3882: 2015 Specification for topsoil;
- e) BS 8601: 2013 Specification for subsoil and requirements for use;
- f) Soil Professional Competence Standards No. 1 (Foundation skills in field soil investigation, description, and interpretation) from the British Society of Soil Science (2018);
- g) Soil Professional Competence Standards No. 4 (Soil science in soil handling and restoration) from the British Society of Soil Science (2025); and,
- h) Other relevant guidance documents are referenced throughout this report.

1.1.5 The objective of the oSMP is to ensure that there is an agreed strategy in place to revert the soil back to baseline ALC agricultural use as required by National Planning Statement EN5 para2.0.25 'to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment [by the Applicant] must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC)'.

4.1.41.1.6 Comment: the Applicant has committed themselves to an 'Agrisolar Research' remit but how this fits into the Soil Management Plan is not set out. If by example the research identifies how soil should be managed during the Operational Phase then this approach should be referred; further, if the research identifies how soil should be ameliorated at Decommissioning Phase then this should be referenced. Currently, an initiative strongly supported by Council is not then enacted for the benefit of the Scheme: this needs address.

1.2 Document Structure

1.2.1 This oSMP is structured as follows:

- **Introduction** – provides an introduction to the document and defines the structure of the oSMP.
- **Baseline Soil Conditions and Characteristics** – describes the existing site soils, including soil types, Agricultural Land Classification (ALC) grades, and other ground conditions based on the baseline studies.
- **Regulatory Context** – provides an overview of the relevant statutory and regulatory regimes and guidance that relates to soil management and contaminated land.
- **Overarching Soil Management Measures** – sets out good practice measures that will be adopted project-wide across all phases of the project in handling soils and materials.
- **Soil Management by Scheme Project Phase** – sets out specific good practice measures that will be adopted at different phases of the Scheme project to protect soil physical characteristics and prevent damage (e.g. compaction, erosion).
- **Contaminated Land and Materials Management Strategy** – sets out how excavated materials, especially those that might be contaminated or considered “waste,” will be managed in accordance with relevant legislation and Environment Agency (EA) guidance.
- **Site-Specific Management Measures** – sets out other measures relating to the specific context of the East Park Energy site (e.g. due to its geographic extent across multiple areas, presence of watercourses, presence of Best and Most Versatile (BMV) agricultural land, etc.).
- **Implementation of Management Plan** – provides a summary of the key requirements that must be within the final SMP, including roles and responsibilities, required further actions (such as appointing specialists, completing detailed investigations, and preparing a final SMP and Materials Management Plan (MMP)), and the approval process through the DCO requirements.
- **Monitoring** – outlines the monitoring, inspection, and reporting procedures to ensure compliance with the SMP during the works, and the record-keeping systems that will be used, to track soil management activities and make information available to regulators and the local planning authority as required.

Commented [PD9]: Unclear what this is

Commented [PD10]: Define

2.0 BASELINE SOIL CONDITIONS AND CHARACTERISTICS

2.1 Site Overview

- 2.1.1 The area of land required for the construction, operation and maintenance of the Scheme, which includes land required for **permanent** and temporary purposes is referred to as the 'Site'.
- 2.1.2 The Site covers approximately **769 hectares** of predominantly agricultural land in a lowland clay vale landscape north-west of St Neots, spanning parts of Bedford Borough Council, Cambridgeshire County Council, and Huntingdonshire District Council.
- 2.1.3 The Site is divided into four main parcels, referred to as East Park Sites A, B, C, and D. These parcels comprise medium to large arable fields separated by hedgerows and occasional watercourses. Site A lies west of the B660 (near Pertenhall/Swineshead), Site B lies between Pertenhall, Keysoe and Little Staughton, Site C is south of Great Staughton (north of the River Kym), and Site D is between Great Staughton and Hail Weston (around Pastures Farm). The four areas are connected by proposed cable corridors, which cross intervening fields and local roads to link the solar array parcels and to connect to the National Grid at Eaton Socon Substation.
- 2.1.4 The topography of the Site is gently undulating. It predominantly occupies low-lying ground (generally 30–70 m above ordnance datum) within a broad shallow vale formed by tributaries of the River Great Ouse. Localised high points exist at low ridges and hills (for example, a small hill between Pertenhall and Riseley in Site A, and a ridgeline between Keysoe and Little Staughton by Site B), but overall the Site has relatively limited relief.
- 2.1.5 Surface drainage is provided by several minor streams and field drains. Pertenhall Brook runs through Site A, an unnamed stream crosses Site B, the River Kym borders Site C to the north, and South Brook (Duloe Brook) runs near Site D. These watercourses and the moderately slow permeability of the

Commented [PD11]: Change and define terms

clay soils mean parts of the Site can accumulate water, but overall the area has a moderate climate conducive to agriculture.

2.1.6 Meteorological data indicates about 115-120 Field Capacity Days per year in this locality, which is slightly less than the lowland England average of 150 days (i.e. soils are typically at field capacity – near saturation – for a shorter period than is average).

2.1.7 Current land use across the Site is almost entirely arable farming (cropland), with some improved grass pasture. There are no significant urban or industrial areas within the Site. A few individual farmsteads and rural dwellings lie within or adjacent to the parcels (for example, Pastures Farm in Site D), but these are excluded from the Scheme development and are surrounded by fields. There are blocks of woodland in the surrounding landscape, but within the Site itself vegetation is mainly crops and field boundary hedgerows.

2.1.7.2.1.8 The Site, the soils, and the surrounding landscape form a complex habitat for fauna and invertebrates, some protected. As identified in the ecological surveys.

Commented [PD12]: Or words to denote fauna and invertebrate habitat

2.1.8.2.1.9 The baseline agricultural condition is typical of productive arable land in the region – soils are annually cultivated for crops like cereals and oilseeds. This long history of cultivation means soil structure in plough layers can be moderately improved (friable when dry), but compaction can occur below plough depth in these heavy soils if not carefully managed. For the purposes of this oSMP, the key baseline considerations are the soil types and agricultural quality across the Site, as detailed below.

2.2 Soil Types and Agricultural Land Classification

Geology and Soil Associations

2.2.1 The Site is underlain by Jurassic Oxford Clay Formation bedrock (a grey clayey mudstone), which at higher elevations is often overlain by glacial till (Diamicton of the Oadby Member) and in valley positions by more recent superficial deposits (alluvium in stream valleys and patches of river terrace sands/gravels). As a result, the natural soils of the area are predominantly

heavy textured clay soils, with some variability where sand/gravel lenses occur. According to the National Soil Map¹, four soil associations are present:

Hanslope, Evesham 3, Denchworth, and Efford 1. These all belong to the clayey soil group: Hanslope and Evesham 3 soils are slowly permeable calcareous clayey soils (often Wetness Class III, i.e. imperfectly drained, though they can be improved to moderately well drained WC II in this relatively drier district). Denchworth soils are heavier and more waterlogged, typically WC IV/V (poorly drained) clayey profiles that even with drainage improve only to WC III. Efford 1 soils, present in smaller areas on better-drained gravelly substrata, are exceptionably well drained loamy soils (WC I). In summary, most of the Site's soils are slowly permeable, seasonally wet clay loams or clays, some calcareous, which respond to drainage but can still suffer winter waterlogging.

- 2.2.2 A detailed soil survey was undertaken as part of **ES Vol 2 Appendix 13-1: Agricultural Land Classification and Soil Resources Survey [EN010141/DR/6.2]** in 2023; ~~additional surveys were then~~ additional surveys were ~~then~~ undertaken in summer 2025. The surveys identified four main soil types on-site corresponding to the above associations. In general, the topsoils are dark brown or greyish brown heavy clay loam or clay, with low stone content and moderate structure when dry. Topsoil was typically observed as between 25-40 cm thick. The subsoils are greyish or olive brown clays, variably mottled and often calcareous in the lower layers, with poor structure at depth where gleyed and slowly permeable. Many profiles are assessed as Wetness Class II or III depending on drainage and texture, and some also face moderate droughtiness limitations in summer on higher ground where the water holding capacity is lower.

Agricultural Land Classification (ALC)

- 2.2.3 The ~~aforementioned~~ ALC survey was carried out with soil pits and auger bores examined across Sites A-D in line with MAFF (1988) guidelines². The findings show that the Site includes a range of good to moderate quality agricultural land. Table 2-1 below summarises the ALC distribution (updated to the final Scheme boundary as per **ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1]**):

Commented [PD13]: We would expect this information about soil types to be discussed/ set out in terms of resilience to disturbance. Even if cross-ref to the survey report, a figure showing the distribution of soil types should be included in the SMP, as this will form the basis of much of the subsequent consideration, monitoring, and enforcement. (EB)

Table 2-1: ALC Grades within the East Park Energy Site

ALC Grade	Description	Area within Site (ha)	% of Site Area
Grade 2	Very good quality	164.0	21.2 %
Subgrade 3a	Good quality	349.5	45.2 %
Subgrade 3b	Moderate quality	182.4	23.6 %
Ungraded *	Assumed Grade 2 (very good)	41.6	5.4 %
Non-agricultural	Woodlands, tracks, etc.	35.4	4.6 %
Total	–	772.9	100%

* *Ungraded areas* refer to land within the Site not surveyed in detail (due to access limitations at the time of survey) but assumed to be agricultural land of similar quality (for assessment purposes, treated as Grade 2).

2.2.4 Approximately 66.4% of the Site is confirmed as BMV agricultural land (Grades 2 and 3a). The remainder is lower quality Grade 3b (about 23.6%). Approximately 10% of the Site was non-farmed or not surveyed. No Grade 1 (excellent quality) land is present on-site.

2.2.5 The presence of Grade 2 and 3a soils indicates that, despite the heavy texture and drainage issues, the climate and terrain permit good arable productivity when managed correctly.

2.2.6 The limiting factors in the ALC assessment were primarily soil wetness in the heavier profiles (especially where topsoil is clay, causing some land to fall in 3b for wetness) and in a few instances soil droughtiness on the freer-draining subsoils at higher positions (limiting those areas to Grade 2 or 3a). In essence, agricultural land quality at the Site is limited by soil wetness and/or droughtiness, and is classified as Grade 2, 3a or 3b.

2.2.52.2.7 When compared to the regional context, the Site contains a somewhat higher proportion of Grade 3 land and lower proportion of Grades 1-2 than the surrounding districts (which is to say it is not the very highest quality farmland in the region, but still largely BMV).

Soil Chemical/Environmental Condition

~~2.2.6~~2.2.8 The baseline soil analysis indicates that topsoils on-site are generally slightly alkaline to neutral in pH (many are calcareous due to the chalky drift/clay) and have moderate organic matter (approx. 2-4%). Typical topsoil textures are heavy clay loam or clay, with clay content often in the 35-45% range.

~~2.2.7~~2.2.9 The land use history of the Site is primarily agricultural, with no heavy industrial past use ~~is being~~ recorded. A preliminary ground conditions assessment (**ES Vol 2 Appendix 12-1: Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]**) concluded that while potential sources of contamination are limited, no extensive made ground is mapped at the surface. Isolated areas of made ground may be present where historic features have been infilled, for example, a few former ponds or pits and the footprints of former farm buildings that have since been demolished. Importantly, significant contamination is not anticipated at the Site. Nonetheless, a conservative approach will be ~~undertaken~~ during ~~the~~ Construction Phase to monitor for any unexpected contaminants (see Section 6).

~~2.2.8~~2.2.10 The soil baseline information provides a foundation for the ~~is~~ oSMP. It ~~identified confirms~~ that soils are heavy, occasionally wet, but largely productive agricultural clays. ~~Thus, the management-oSMP's approach focus~~ will be on avoiding physical damage to these soils (compaction, smearing, erosion, ~~turning~~); ~~and ensuring that the soils they~~ can be fully restored as required by NPS EN5 as part of the Decommissioning Phase post disturbance; ~~and, thereby preserving the soils's~~ agricultural quality (especially for the BMV areas).

3.0 REGULATORY CONTEXT

3.1 Industry Best Practice for Soil Management

3.1.1 This oSMP adopts relevant best practice guidance for soil handling, including:

- the Department for Environment, Food & Rural Affairs (Defra) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009)³;
- the Ministry of Agriculture, Fisheries and Food (MAFF) Good Practice Guide for Handling Soils (2000)⁴;
- the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Workings (2021)⁵;
- the Building Research Establishment (BRE) /National Solar Centre "Agricultural Good Practice Guidance for Solar Farms" (2014)⁶;
- Natural England's Agricultural Land Classification: Protecting the Best and Most Versatile Agricultural Land (Technical Information Note 049)⁷; and
- British Society of Soil Science Guidance Note 3 'Benefitting from Soil Management in Development and Construction (2022)'⁸

3.1.2 The above guidance provides methods to strip, store and replace soils in a manner that maintains their viability. Key principles from these documents (which are reflected in Section 4.0 ~~of this plan~~) include only handling soils when they are dry enough to avoid damage, using appropriate machinery (e.g. excavator and dump truck method) to prevent compaction, separating topsoil and subsoil, limiting stockpile heights and durations, and reinstating soils carefully with subsequent aftercare.

3.2 Waste and Environmental Permitting Regulations

3.2.1 Although the Site is currently mostly in agricultural use~~greenfield~~, any soil management plan must consider environmental protection laws. The oSMP aligns with the EA's guidance on protecting soils and managing materials, including compliance with the Environmental Protection Act 1990 (which governs disposal of wastes, including soil) and the Environmental Permitting (England & Wales)

Regulations 2016 for any activities that might involve treating or storing waste soils.

3.2.2 The CL:AIRE Definition of Waste: Development Industry Code of Practice⁹ (DoWCoP) is a recognised protocol in England for managing excavated materials in compliance with these requirements. Under the DoWCoP, developers can reuse site-won materials without an environmental permit, provided a MMP is prepared and signed off by a Qualified Person i.e. an independent, suitably experienced professional who is formally registered with CL:AIRE to review and sign off on the use of excavated materials under the protocol. The reuse must ~~also~~ pose no pollution risk to human health or the environment, must be suitable for its intended purpose, must have certainty of use, and must be limited to the quantity necessary. (Section xx sets out how this will be addressed).

3.2.3 This self-regulatory approach streamlines reuse and recovery on site, but it is voluntary. The DoWCoP will guide the reuse of clean excavated soils on site (Section 6.0 ~~of this oSMP~~ outlines how this will be applied).

3.2.4 In summary, ~~the~~ oSMP adopts the best practices and measures as set out in the above documents, identified but not limited to:

- a) ~~-~~Preserving soil structure;
- b) ~~Avoiding harms (e.g. erosion, compaction, smearing and erosion from poor handling or vehicle movements, etc);~~
- c) ~~Avoiding contamination (due to say on-site works and cross-soil contamination);~~
- d) ~~e.g. -~~Avoiding soil handling in adverse conditions;
- e) ~~-~~ Minimising soil compaction at source;
- f) ~~, S-~~stripping and storing soils by horizon; ~~-and~~
- g) ~~Ce~~arefully reinstating soils by horizon as identifies in the site survey ~~them~~;
- h) ~~Ensuring that after the Operational Phase (temporary disturbance) the~~

soil will retain and be brought back to as a minimum its ALC agricultural use (soil productivity) and ecological value; and,

- i) It is generally read that these measures will be applicable across all Phases unless specifically denoted as not.

3.2.5 All personnel and contractors ('workforce'), across all Phases, will be required to adhere to ~~follow~~ these measures and practices when undertaking works (construction and/or maintenance) on-site. The guidance documents will be available and held to the on-site team and form part of the training/toolbox talks (see Section 8.0) so that the workforce understands the "do's and don'ts" of soil management as set out in ~~the~~ this oSMP.

~~3.2.4~~ By adhering to established codes and guidance, delivering against the measures and practices as set out, and ensuring reporting management systems are agreed, the Scheme will meet ~~or exceed~~ industry standards for sustainable soil management ~~use~~.

Commented [PD14]: What are these? It is not clear what the documents are. Should they not be appended to the oSMP?
Suggest reference back to paragraph 1.1.4 if this is the guidance being referred to. (LP)

4.0 OVERARCHING SOIL MANAGEMENT MEASURES

4.1 Roles and Responsibilities

4.1.1 It is Principal Contractor's responsibility to implement the SMP. The implementation of the soil management measures will require, as a minimum, the following roles and responsibilities:

- a) Site Environmental Manager;
- b) Agronomist (Soil Scientist); and
- c) Site Agent.

4.1.2 The Site Environmental Manager will be responsible for:

- a) Pre-construction planning;
- b) Effective vegetation and foreign object (e.g. plastic bottle, and metal scrap) clearance prior to soil stripping commencing;
- c) Confirmation that topsoil and subsoil resources have been correctly identified, and soil plasticity tests are undertaken and recorded ahead of soil stripping;
- d) Effective separation of soil types and layers during stripping and stockpiling, where data relating to the volume and type of topsoil and subsoil excavated, transported and stockpiled is recorded;
- e) Effective stockpile construction where locations and conditions are recorded, and monthly inspections of stockpile condition; and
- f) Effective backfilling of each layer in the correct sequence (where backfilling is required).

4.1.3 The Soil Scientist will be responsible for:

- a) Undertaking soil surveys types and undertaking soil plasticity assessment;
- b) Preparing soil reports to be submitted to the local planning authority;
- c) Provision of training identifying topsoil, subsoil, soil type, and soil plasticity assessment to relevant personnel involved in soil handling and management activities;
- d) Conducting site-specific toolbox talks on soil stripping and storage; and
- e) Monitoring and auditing of all soil handling activities identified in the SMP.

4.1.4 The Site Agent will be responsible for effectively implementing soil handling activities.

4.1.5 For the purposes of the Soil Management Plans it is assumed that these roles will be appointed across all phases.

4.14.2 Soil Management Measures

4.1.4.2.1 This section expands on the sets-out general measures and good practices identified above that will apply to soil handling and storage throughout the Scheme project, across all work areas (as defined in ...). These measures are aimed at preserving soil structure, avoiding erosion and

Commented [PD15]: By these measures not being generic enough, in some case they then contradict the measures set out against each Phase. As you see from our comments this leads to significant confusion/ misunderstanding of intent

Commented [PD16]: Before this section, we would expect a section on roles and responsibilities for implementation of the SMP. Importantly, this would include details of who has authority to identify and implement 'stop work' based on soil conditions. (EB)

Commented [PD17]: Or roles as Applicant has defined

~~contamination, and ensuring that after temporary disturbance the land can retain its productivity or ecological function.~~

Commented [PD18]: Avoids duplication of intent

Commented [PD19R18]: See 3.2.4 for measures; these should correlate

~~4.1.24.2.2 Key threats to soils during construction are compaction, smearing, and erosion from poor handling or vehicle movements. The following overarching good practice measures will be implemented to mitigate these risks.~~

Pre-construction planning of soils

~~4.1.34.2.3~~ Before any stripping of soil, the different soil types or "soil resource units" across the Site will be confirmed and mapped, using the baseline survey information. Topsoil from one area will not be mixed with topsoil from a substantially different area; similarly, topsoil and subsoil will be treated as separate resources. The mapping will allow the Applicant to plan where each soil will be temporarily stored and ensure that upon reinstatement topsoil is returned to the same soil unit area that it was derived from. This like-for-like replacement is important to maintain the local soil characteristics and productivity.

Vehicle Movements on Unstripped Soil

Commented [PD20]: Activity clarified per Phase is required as impact(s) may differ.

Commented [PD21]: As it remains unclear how the Replacement Phase and Decommissioning Phase will be accessed, the Council requires such clarity which then needs to be set-out in the oSMP.

~~4.1.44.2.4~~ Movement of the construction vehicles plant on unstripped ground will be limited. The following measures will be adopted:

- Use of defined temporary access tracks or haul routes for use during the Construction Phase as identified and agreed on Plan xxx, wherever feasible.
- For new tracks...topsoil etc
- For existing farm tracks...topsoil etc
- ~~Topsoil along access routes will be stripped, or existing farm tracks will be used.~~

- If vehicles must cross agricultural land not designated for topsoil stripping (e.g., grass fields), this will be carefully managed using temporary matting, or limiting to low ground pressure vehicles in dry **conditions**.
- Heavy vehicles will be prohibited from accessing reinstated areas (backfilled and topsoil re-spread) to avoid re-compacting restored soil.
- The site layout will clearly mark "no-go" areas e.g. reinstated plots, protecting sensitive areas to remain **undisturbed**.
- Where feasible, a grass cover will be established over working areas (particularly the solar array fields) prior to heavy vehicle access – for example, allowing existing grassland to grow or seeding grass cover early on arable land to help protect the topsoil structure.

Commented [PD22]: During which Phase?

Commented [PD23]: During which Phase; etc

4.1.54.2.5 Vehicle **movements** on unsurfaced areas should occur when ground conditions are appropriate, typically from late March to mid-December. During this period, work should not cause soil damage or compaction, as the ground conditions should be capable of withstanding the effects of vehicle traffic.

Commented [PD24]: Is this construction, replacement, maintenance, decommissioning movement?

4.1.64.2.6 From mid-December to mid or late March, soils are more prone to saturation and damage. Therefore, vehicle movement should be minimised during these months to prevent the need for ground mitigation **works**.

Commented [PD25]: How is this regulated? By whom?

4.1.74.2.7 Clearly, weather conditions vary each year, so the above periods may differ. There could be times in winter when soils are dry and suitable for construction, while in spring or summer, trafficking should be avoided at certain **times**.

Commented [PD26]: Too vague. Requires a mitigation strategy (say tilling post vehicle traffic...)

Commented [PD27]: Could be reworded whilst still expressing the sentiment that wetness is key not season. (EB)

Avoid handling soils when wet or frozen

4.1.84.2.8 No stripping, heavy vehicle movements across unstripped ground, or tipping of soil will take place when soil moisture is at or above its plastic limit (too wet) or when the ground is waterlogged, frozen, or snow-covered.

4.1.94.2.9 The plastic limit can be assessed via simple field tests (e.g. roll test as per MAFF guidance⁴ – if a soil roll of approximately 3 mm can be formed without crumbling, the soil is too wet). If heavy rainfall occurs during works, soil handling will pause and not resume until the soils have drained and passed

a

repeat field test. Likewise, if a prolonged wet autumn/winter makes soil handling unavoidable (due to schedule), the Applicant will implement methods such as only stripping small areas that can be handled in short weather windows, using protective mats or low-pressure equipment, and increasing monitoring by the soil specialist to prevent damage.

~~4.1.14~~ ~~4.2.10~~ Seasonal programming will seek to ensure major soil movements occur in drier periods if possible (spring/summer), recognising that some wet-season work may be unavoidable given the scale of the Scheme. If works are required in wetter periods a method statement would be prepared demonstrating how soil damage will be mitigated. And submitted to the local planning authority/ EA/ other?? For written approval.

Use appropriate machinery and methods

~~4.1.14~~ ~~4.2.11~~ Soils will be stripped and handled using techniques that minimise compaction. The preferred method is the excavator-and-dump-truck method (sometimes called the "strip and haul" method) rather than bulldozers or scrapers, especially on heavy soils. 360° excavators will gently scrape off topsoil in shallow layers, and dump trucks or tractors/trailers will transport soils to stockpile, running on agreed access tracks or haul routes designated routes.

~~4.1.14~~ ~~4.2.12~~ Low ground pressure (LGP) machines or tracked vehicles will be employed for earthworks on soil surfaces where possible. Machinery will be well maintained and fitted with GPS or depth control where practicable to ensure accurate stripping depths and avoid over-stripping. If particularly sensitive areas are identified (for example, an area with very soft ground), alternative methods like using tracked conveyors for moving soil might be considered to further reduce the need for vehicle movements on soils.

~~4.1.14~~ ~~4.2.13~~ Wheel washing facilities at site exits will prevent soil being tracked off-site.

Segregation of topsoil and subsoil

~~4.1.14~~ ~~4.2.14~~ Topsoil (the upper fertile layer, typically 25-40 cm) contains most of the organic matter and nutrients and will be stripped and stored separately from

Commented [PD28]: This needs to be defined - accredited to which Institute or similar. Who appoints such; costs/ etc.

This could be Institution of Agricultural Engineers or British Society of Soil Science, Institute of Professional Soil Scientists etc but equivalent expertise may exist outside organisations, such as with the agricultural machinery supplying agents, or the farming community. Could possibly have a method of approving competence rather than narrowing the options. (EB)

Commented [PD29]: What does this mean?

Commented [PD30]: Set out draft mitigation/ method statement.

While we acknowledge that an oSMP is an undertaking of commitments, rather than providing the resolved detail because the issue and solution should be tailored to soil type, amendments, plant requirement and scale etc. through the surveys undertaken the Applicant has the information to set-out broad, objectives that are SMART. (EB; PD)

Commented [PD31]: Is there a maximum vehicle + load that is specified?

While we acknowledge caution against being overly specific because it may lead to very detailed specification on axle weights and ground pressures that then need auditing; and that methods as presented are good practice/ specifying outcomes would be better than imposing limitations; we do refer to the Applicant's Technical Note [REP3-075] regarding maximum vehicle sizes as a stated commitment. (EB; PD)

Commented [PD32]: Clarity across the MP

subsoil. Likewise, different topsoil types (if identified) will be stored separately.

4.1.154.2.15 The stripping depth for topsoil will be based on the ALC/soil survey logs (generally up to the plough layer or change in colour/texture). Subsoil will only be excavated where required for deeper works (e.g. cable trenches, foundations, drainage features) and will be stockpiled separately.

4.1.164.2.16 There will be no mixing of topsoil with subsoil. As set out above different topsoil types (if markedly different in texture or quality between fields) will be kept separate in stockpiles, and managed in accordance with the method set out below. If any non-soil materials (like stones, rock from any deeper excavation, or construction aggregates) are present, those too will be stored separately or removed, not mixed into the soils. By preserving the integrity of the topsoil, this approach will ensure that when it is replaced, its fertility and structure remain intact.

Stockpile management

4.1.174.2.17 Designated areas for soil storage will be established on-site, ideally on level ground and 10 m away from watercourses.

4.1.184.2.18 Topsoil stockpiles will not exceed 3 m in height, and subsoil stockpiles will not exceed 5 m, to avoid excessive compaction of the material. Stockpiles will have gentle side slopes (e.g. 1:2 gradient) and will be tracked over by an excavator to compact lightly only enough to stabilise the pile (prevent slumping). Long-term stockpiles (to be in place >3 months) will be seeded with a grass mix to aid stability and prevent weed encroachment.

4.1.194.2.19 Each stockpile will be clearly signposted (e.g. "Topsoil from Field A") to prevent any inadvertent mixing or removal.

4.1.204.2.20 No vehicles will be allowed to drive over or park on stockpiled soil.

4.1.214.2.21 During the Construction Phase, stockpiles will be inspected after heavy rains or wind to check for any signs of erosion; if found, additional silt fencing, bunding or covers will be applied.

~~4.1.224.2.22~~ In the event stockpiles need to remain for over a year (which could trigger regulatory concerns under DoWCoP timing), the Scheme project will review whether a permit or additional management is required (see Section 6.0).

Commented [PD33]: With who? Are you suggesting the Environment Agency?

Protection of soil from contamination

~~4.1.234.2.23~~ All machinery will be checked for fuel/oil leaks and maintained to avoid spills onto soil. Refuelling and equipment maintenance will occur on hardstanding or dedicated impermeable areas with spill kits available. If any accidental spill of fuel, oil or other chemicals on soil occurs, the contaminated soil will be excavated and removed for appropriate off-site disposal, or remediated in situ if appropriate (in line with the spill response and pollution prevention measures as set out in the **Outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]**).

~~4.1.244.2.24~~ No construction materials (e.g. concrete, chemicals) will be stored directly on the ground without membrane protection. Concrete washout will be in lined skips or pits, not on bare soil. These measures will ensure that the soil to be re-used is not polluted by construction activities.

Commented [PD34]: And Decommissioning Phase?

Erosion and sediment control

~~4.1.254.2.25~~ Although the Site is generally flat, exposed soil surfaces can be prone to erosion by runoff or wind. Temporary drainage and runoff control will be implemented, such as silt fences or straw bales along downslope edges of stripped areas, to capture sediment. Ditches will be protected from infill by keeping a setback or installing sediment traps where necessary. A 10 m buffer from watercourses has been provided within the design and will be maintained, with the exception of where watercourse crossings are proposed (see **Outline Landscape and Ecology Management Plan (oLEMP) [EN010141/DR/7.7]**). Stockpiles will therefore be located at least 10 m away from any watercourses or drains to reduce risk of sediment runoff to water.

~~4.1.264.2.26~~ If earthworks expose large areas, those areas will be broken into smaller phases or re-vegetated quickly to reduce the duration of exposure.

~~4.1.27~~ 4.1.28 Soil stockpiles will be covered or seeded if left for long periods (as noted above).

~~4.1.28~~ 4.1.29 The **oCEMP [EN010141/DR/7.3]** provides further detail the water quality management and sediment control. Dust suppression (e.g. damping down haul roads in dry weather) will also be employed to prevent wind erosion of dry soil and deposition off-site.

Soil Aftercare and Restoration

~~4.1.29~~ 4.1.30 The overarching principle of soil restoration of the Site will be to ensure that, as far as practicable, excavated soil will be returned to its original place and **condition**. This means that after construction, reinstated soils may need some aftercare. For instance, if topsoil has been stockpiled for an extended period, e.g. more than 3 months, it might have lost some nutrients or soil biota; thus, prior to re-cultivation, the soil may require amelioration (such as light fertilisation, re-introduction of organic matter, or deep loosening). The exact needs will be determined by testing. Any soil compaction identified after construction (for example in subsoil under a haul road) will be alleviated by appropriate tillage (subsoiling or ripping to break up compact layers) before topsoil is re-spread. If reinstated areas settle or erode, it may be necessary to regrade and repair those areas. In the operational phase, the soils will generally be under grass cover, which is itself a form of aftercare, improving structure and organic carbon **content**.

Commented [PD35]: There ate two ideas here. One, relocation which is 'as far as practicable' and condition which is an absolute requirement.

Commented [PD36]: Decommissioning Phase?

4.1.30 [REP3-060] The final SMP will include measures to ensure that agricultural land disturbed by the Scheme, including temporary construction areas, access tracks, compounds, cable corridors and grid connection works, is reinstated so that the land is returned to the Agricultural Land Classification grade recorded in the pre-construction ALC survey. Where land is temporarily disturbed during construction, reinstatement will be undertaken as soon as practicable following completion of the relevant works. Where agricultural land is occupied by operational infrastructure, reinstatement to the baseline/pre construction ALC grade will be undertaken following decommissioning. This

Commented [PD37]: It is noted that [REP3-060] includes this clause which may augment/ duplicate the HA's review on [REP1-044]. Applicant to review accordingly.

will be achieved through retention and reuse of the original soils, segregation of topsoil and subsoil and, where relevant, separate soil resource units, replacement of soils in their original sequence and horizon thicknesses, alleviation of compaction, repair or reinstatement of land drainage where affected, and aftercare where required. The objective is that there will be no degradation of the pre-construction ALC grade as a result of the Scheme.

Monitoring and record-keeping

~~4.1.30~~ 4.2.30 A soil handling log will be maintained by the Environmental Clerk of Works (ECoW). Daily records will note weather and soil condition, areas stripped or filled, volumes moved, and any incidents (e.g. wet soil stop conditions, spills). This record will support compliance with this oSMP and provide evidence for the MMP.

Commented [PD38]: ECoW/ roles needs a to tie back to earlier Chp 4.1 (EB; PD)

~~4.1.34~~ 4.2.31 Photographic records of soil conditions (before stripping, after stripping, and after reinstatement) will be taken for key areas. Any non-conformance with

Commented [PD39]: Define/ to vague

the oSMP (e.g. inadvertent mixing of soil layers) will be reported and remedial actions recorded as part of the project Environmental Management System (EMS) as described in Section 9.0. These records will feed into the verification report required under the CL:AIRE DoWCoP process (if applicable) and demonstrate that soil resources have been handled correctly.

Commented [PD40]: To who/ suggesting the Environment Agency?

4.24.3 Summary

4.2.14.3.1 By implementing the above suite of measures, the Scheme will handle soils in a manner that preserves their quality to ensure ALC agricultural use (soil productivity) and ecological value to the maximum extent practicable. ~~In essence, the Scheme will treat soil as a valuable resource, not a waste product for disposal, and will undertake all practicable measures to conserve its quality.~~ The next section describes how these principles are applied during the distinct project phases (construction, operation and decommissioning).

5.0 SOIL MANAGEMENT BY ~~SCHEME~~PROJECT PHASE

5.1 Construction Phase

Preliminary Works and Soil Stripping

Commented [PD41]: This should relate to best practices and measures 3.2.4

- 5.1.1 Prior to main construction, any required preliminary works such as creating temporary access roads, drainage, or site compounds will follow the soil stripping principles set out in Section 4.0. For example, where a construction compound or access track is to be placed, the topsoil will first be stripped and stockpiled for later reinstatement.
- 5.1.2 Topsoil stripping will typically be to a depth of approximately 300 mm (adjusted if site-specific data shows different topsoil thickness).
- 5.1.3 If unexpected obstructions or contamination (e.g. oily stained soil) are encountered during stripping, works will pause and the procedures in Section 6.0 will be followed, which may involve sampling the soil and segregating it for special handling.

Excavation and Trenching

- 5.1.4 The Scheme involves installing cabling, and foundations for inverters, transformers, battery containers, or substation equipment.
- 5.1.5 Cable trenches connecting the solar arrays and linking to the substation will be dug to a maximum depth of 1.2 m. The 400kV cable trench will be up to 2 m in depth. The trench excavations will produce subsoil material which will be placed adjacent to the trench separate from topsoil (the topsoil having been stripped and set aside first). For linear trenching operations, a common practice of "strip, excavate, lay, backfill, reinstate" in sequence will be used to minimise the duration soil is out of the ground. Excavated subsoil will be reused as backfill in the same trench after cables are laid. The stockpiled topsoil will then be respread on top. Excess topsoil should be left adjacent to the filled trench whilst soils settle, allowing the excess soil to be placed once

settlement has occurred. This way, cable trenching does not generate surplus soil needing disposal. It is specifically noted that this methodology will also apply during:

a) Operational Phase: replacement of the cables during the life-time of the Scheme (20% replacement anticipated due to defects) pulled through but some 'opening-up' would be required : Ref. Technical Note (REP3-0751); and,

b) Decommissioning Phase: at removal of all cables and deep foundations.

5.1.6 [REP3-060] For cable trenching, including the 400kV cable trench and other underground grid connection works, the final SMP will identify the relevant baseline ALC grade, soil resource unit, topsoil depth and subsoil horizons along the affected corridor, informed by the ALC and soil resource survey data and any further pre-construction survey required under Section 8.1.4. Excavated soils will be stripped, stored and reinstated so as to replicate, as far as practicable, the original soil profile and horizon thicknesses. Following backfilling, settlement and any necessary compaction alleviation or land drainage repair, the cable corridor will be reinstated to the condition and pre construction ALC grade recorded before construction.

Commented [PD42]: It is noted that [REP3-060] includes this clause which may augment/ duplicate the HA's review on [REP1-044]. Applicant to review accordingly.

5.4.65.1.7 Should, following this procedure, excess soil remains then this would be stored in accordance with the methods set out below and where possible integrated into the landscape design in order to manage soils sustainably and retain them on site where feasible.

5.4.75.1.8 If the trench material is found unsuitable for direct backfill (e.g. very wet or containing large lumps), it may be conditioned (dried or crushed) or replaced with suitable material and the excess managed as per Section 6.0.

5.4.85.1.9 Pile driving for panel supports (if using driven piles) typically does not require excavation – in that case, soil disturbance is minimal, limited to the pile itself displacing soil. If screw piles or drills are used and spoil is brought to surface, these minor arisings will be spread thinly on surrounding ground or collected as appropriate.

5.4.95.1.10 The foundations for by example but not limited to inverters,

Commented [PD43]: Suggest reference to the works as identified in the DCO.
Construction: need to acknowledge soil movement and foundations for:
-the compound at construction.
-parking, storage and facilities.
-BESS site is extensive soil movement, impermeable lining, creation of lagoon.
-Foundations for buildings and water storage tanks.
All above worth identifying and the Soil Management Plan to provide details of work activity wrt soil (DC).

transformers, battery containers, or substation equipment will require deeper excavation and a concrete footing. In these locations, the topsoil and subsoil will be excavated and stored separately; upon backfilling around foundations, subsoil will be replaced and then topsoil on top so that any adjacent landscaping can be reinstated.

Soil Storage and Bunds

~~5.4.40~~5.1.11 Throughout excavation works, temporary storage durations will be kept ~~short~~ no longer than one month – wherever possible, excavated soil will be returned to its original position within a week. If any excavated material cannot be immediately reused and must be stockpiled for longer than ~~approximately~~ one year, the ~~Scheme project~~ will review compliance with CL:AIRE DoWCoP rules on stockpile time limits. The DoWCoP states that material stockpiled in excess of one year requires a justification or may be deemed waste without a permit, so the aim is to avoid long-term stockpiling unless part of an approved plan.

Commented [PD44]: Is this the same as Chp 3: Avoiding soil handling in adverse conditions; Minimising soil compaction at source; Stripping and storing soils by horizon?

Commented [PD45]: Need to expand on this 'plan'.

~~5.4.14~~5.1.12 The only potential long-term stockpiles might be if surplus material is set aside for eventual use in the final site restoration; if so, that will be accounted for in the MMP such that the reuse is still considered a certainty.

~~5.4.12~~5.1.13 During construction, some soil may be used to create temporary bunds (e.g. perimeter bunds for screening or runoff control). Any such bunds will be made from subsoil where possible (to reserve topsoil for reuse in planting). If topsoil is used in temporary bunds for screening, it will be treated as a stockpile (seeded if standing for long) and will be reinstated to its original area afterward.

5.1.14 Soil storage areas will be **monitored** and if signs of erosion appear, mitigation (cover, silt fencing) will be applied promptly. Should any stockpiled soil become excessively compacted or waterlogged, it will be remedied prior to reuse (e.g. turning the pile or allow drying). All topsoil stockpiles will be sampled (especially if stored over a year) for nutrients and contaminants prior to reuse in restoration, to inform any amelioration needed (fertiliser or lime, etc.).

Commented [PD46]: By whom?

5.1.15 Method statement on the construction of the drainage/ firewater BESS lagoon required.

5.1.16 Method statement required on constructing culverts and access routes across water courses re soils movement et al.

5.1.17 Method statement required on tree pits and potential grey soils/ water-logging and importation/ use of site topsoil.

Commented [PD47]: Programme to be set out for remediation and testing of topsoil to ensure that it is fit for purpose. Table such an action plan. Again, by whom? What is the reporting process?

~~5.4.13~~5.1.18

Restoration and Reinstatement

~~5.4.14~~5.1.19 The ~~Scheme project~~ will implement progressive reinstatement of soils wherever possible. This means that as soon as a sub task of the construction activity portion of work is completed ~~in an area~~ (for example, once a group of panel rows and their cables are installed in a specified field), the stored soils for that field will be reinstated without waiting for all Scheme construction to

finish. By doing this, soils spend less time in stockpiles and the land can begin to recover sooner.

~~5.4.15~~5.1.20 Reinstatement (General areas): this will follow the reverse order of stripping: subsoil (if excavated) will be placed back and lightly compacted as needed (taking care not to over-compact), and then topsoil, remediated as required, will be placed on top to the original depth. Where the original topsoil is excess (for example, if subtle land re-grading was done or foundations occupy volume), the surplus topsoil will be used elsewhere on site in landscaping or thinly spread so as not to significantly raise ground levels.

Commented [PD48]: Not supportive of excessive movement of topsoil across the Site as this may move pathogens from one field to another. Rather, excessive topsoil should only be used within that field.

~~5.1.16~~ **5.1.21** The ~~surface of the reinstated and re~~ restored ~~subsoil surface~~ will be left in a roughened state (not smooth rolled) to help it re-aerate and receive rainwater. Any large clods ~~larger than a fist~~ will be broken down, ~~and if~~ the soil structure has been compacted, appropriate loosening will be undertaken – e.g. use of a winged tine subsoiler or deep ripper, especially in wheel track areas, to alleviate compaction in subsoil before topsoil replacement. Stones brought up (if any) will be collected to approximately match original stoniness.

~~5.1.17~~ **5.1.22** Finally, the topsoil will be cultivated in accordance with the oLEMP [EN010141/DR/7.7] and will be sown to establish permanent grassland under and around the solar arrays. This ~~rapid-grass-seeded re~~ vegetation will, ~~once fully established~~, protect the soil from erosion and provide a ~~stable~~ condition for the operational phase. Where agricultural use (e.g. grazing) is to continue the soil will be restored to a condition capable of supporting that ~~use~~.

5.1.23 In arable fields converted to solar use, the soil will be sown to grass and not cultivated annually during operation, which helps build structure and organic matter. Any areas of habitat creation will use the Site's topsoil but possibly with some modification; specific measures are set out in the oLEMP [EN010141/DR/7.7].

5.1.24 Reinstatement of soil - (construction phase) satellite work compounds:

5.1.25 Reinstatement of soil - (construction phase) access & haul routes:

5.1.26 Reinstatement of soil - (construction phase) lagoon bund:

5.1.18

5.2 Operational Phase

5.2.1 During the operational phase of the Scheme, ground disturbance will be minimal. The solar arrays are a largely passive use of the land, and vegetation (grassland) will be maintained by periodic mowing or grazing set out in the oLEMP [EN010141/DR/7.7]. ~~However~~, the oSMP principles ~~still~~ apply to any maintenance that involves soil work and this is secured via the **Outline Operational Environmental Management Plan (oOEMP)**

Commented [PD49]: There are 5 references to 'topsoil' in the oLEMP, with para 5.2.5 which mentions importation of topsoil in accordance with BS3882:2015 BS Topsoil.

While BS3882 is a useful document in establishing appropriate nutrient ranges it is specifically for traded topsoils to provide a measure of quality. For ecological purposes, values lying outside those ranges may still be appropriate. We would propose that the oLEMP should be the appropriate document for means and specification of minimum specification, to enable establishing the grassland and habitat planting. (+AECOM?EB; PD)

Applicant to review.

Commented [PD50]: Stable for what?

Commented [PD51]: Currently there is no grazing only crop use...

Commented [PD52]: Reword; ref as above.

Commented [PD53]: Only two refs; both not setting out actual nature of works.

[EN010141/DR/7.5] Table 5.9-

- 5.2.2 If underground cables need to be accessed for the life of the Scheme~~repair~~, the excavation, storage, amelioration, and backfilling will follow the same segregation and handling rules set out above for construction (and any removed soil will be stored and reinstated).

5.2.3 Routine maintenance of access ~~tracks~~ might involve grading or adding stone; any spoil generated from re-grading track shoulders will be thinly spread on adjacent land or collected for reuse.

Commented [PD54]: Which are these?

5.2.4 It is not anticipated that there would be any major soil disturbance arising from periodic replacement ~~works campaigns~~ of panels / inverters / transformers / BESS units. However, it is possible that during these ~~works operations~~ that soils could become compacted by tracking from machinery. If the soil structure has been compacted, appropriate loosening will be undertaken e.g. use of a winged tine subsoiler or deep ripper, and the area re-seeded.

5.2.5 A programme ~~for the duration of this phase~~ will be in place to monitor soil ~~health~~ quality in areas that ~~were disturbed and are~~ reinstated. This ~~as a minimum will may~~ involve periodic soil sampling or penetrometer testing to ensure that compaction has not reoccurred and that the soil is supporting the desired vegetation cover. If issues are identified (e.g. waterlogging in an area due to settling), remedial actions like additional drainage or soil loosening might be taken. Similarly, if drainage causes an erosion issue this would be addressed ~~with immediate effect~~promptly. For instance, if a heavy rain event causes run-off that starts to develop rills along panel drip lines, corrective measures would be implemented such as soil reinstatement, reseeding, installing shallow spreader drains, adding reinforcement like coir mat under problem spots. Maintaining the grassland vegetation cover is the primary mitigation measure. Grazing (if employed for grass control) will be managed to avoid poaching of soil by livestock, unless intended for the purposes of conservation.

Commented [PD55]: ?? think this means the process where heavy hooves penetrate and churn up wet, exposed ground, destroying the vegetative cover and compressing the soil structure. It commonly occurs in heavily trafficked areas like gateways, water troughs, and feeding stations during wet weather?

5.2.6 Overall, the operational phase is expected to have a benign impact on the soil's quality and structure – the ~~soil land~~ will essentially lie fallow (under grass) which can improve structure and organic content over time. The key is to maintain the grass cover and prevent any localised damage; the appointed site ~~operator~~ will be responsible for this, guided by the oLEMP [EN010141/DR/7.7].

Commented [PD56]: Who is this? oOEMP's 'Environmental Manager/ oLEMP 'Clerk of Works/ etc?

5.2.7 12-months prior to Decommissioning, the Operator will prepare an update to the Outline Decommissioning Soil Management Plan broadly in accordance with the Outline Decommissioning Soil Management Plan (Appendix A) which

will address inter alia any research recommendations as identified by the Agrisolar Research 'Unit' and as best practice and submit this to the local planning authority for written comment prior to amending and submitting a final Decommissioning Soil Management Plan to the local planning authority for written approval. The remedial and other related soils works will be undertaken in accordance with this Plan.

~~5.2.6~~ 5.2.8 12-months prior to Decommissioning, the Operator will undertake detailed pre-decommissioning phase surveys, in accordance with the survey sampling density requirements of Natural England, to inform any strategy of remedial works required to ameliorate and/or augment the soil to bring it back to the baseline ALC.

5.3 Operational (Replacement) Phase

5.3.1 Text

Commented [PD57]: Ref to Technical Note?

5.3.4 Decommissioning Phase

~~5.3.1~~ At the end of the Scheme's ~~life~~ the development will be decommissioned and the Site restored to as a minimum the condition of baseline ALC in accordance with NPS EN5 that enables its previous land use to continue.

Commented [PD58]: This needs to be filled out with how, stds, who, etc.

5.4.1 [REP3-060] At the end of the Scheme's life the development will be decommissioned and agricultural land affected by the Scheme will be restored if necessary to a condition that enables its previous land use to continue and returns the land to the pre-construction ALC grade recorded prior to construction, subject to any areas agreed with the relevant planning authority for retained habitat, landscape or ecological purposes

Commented [PD59]: It is noted that [REP3-060] includes this clause which may augment/ duplicate the HA's review on [REP1-044]. Applicant to review accordingly.

5.4.2 During the decommissioning phase, soils and land will be disturbed due to the removal of all infrastructure. Soil mitigation measures during the construction stage outlined in this outline SMP would still apply during decommissioning phase in principle. However, a final SMP will be needed to be in place to

reflect weather, soil and land conditions to ensure the Sites returned to their original use and condition as far as practicable. The final Soil Management Plan for the decommissioning phase will primarily include the following but not limited:

a) Site preparation;

b) Soil stripping;

c) Soil stockpiling;

d) Soil reinstatement;

e) Soil profiles to be reinstated will be designed to ensure soils /land to be restored to previous condition;

f) Treatment of overburden and placement by subsoiler/ripper, especially for BESS where the ground has been sealed;

g) Restore field drainage where required to avoid waterlogging;

h) Soil placement; and,

i) Soil aftercare and remediation.

5.4.3 The Operator will undertake detailed decommissioning phase surveys, in accordance with the survey sampling density requirements of Natural England, to evidence that the soils are back to the baseline ALC.

5.4.4 The Operator will undertake the works as identified including the provision of staff and equipment resources and funding to bring the soil quality upto the standard as required. For the purposes of the Soil Management Plan, the post-decommissioning window is assumed to be five years to align with NPS EN5 site restoration timeframes (Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites).

5.4.5 The Operator will prepare a Concluding Soil Management Plan to evidence that the soils are back to the baseline ALC as required by NPS EN5 and submit this to the local planning authority for written approval prior to handing over the site back to the land-owner.

Commented [PD60]: Applicant's provisional statement (Ref. LIH revert).

Typically, ALC assessment would be undertaken 5 years after the decommissioning and so this 5-year window is required. Rather than a concluding SMP as proposed in the para below, this window will remain open until the land is restored to the baseline conditions with a SMP only if additional works are required in addition to the decommissioning SMP. This commitment means that less specificity is needed in the additional paragraphs added to this version of the document. (EB; PD)

Applicant to address.

Comment: the Decommissioning Phase should address the matter that in the removal of the underground cables, soil profiles may become mixed and topsoil may become contaminated. This needs some address within the Plan.

5.4.6 Decommissioning will involve the removal of all infrastructure and works (e.g solar panels, frames, above-ground-all cabling, inverter stations, the battery storage facility, and any hardstanding or foundations, detention lake, concrete works).

5.4.7 The approach to soil management during decommissioning will be to address ~~the mirror that of construction, with the added goal of final restoration, stated~~ objective of the oSMP, namely to ensure that the soil reverts back to baseline ALC agricultural use as required by National Planning Statement EN5 para 2.0.25 *'to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment [by the Applicant] must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC).'*

5.3.25.4.8

5.3.35.4.9 The **outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6] Table 5.9** requires that a Decommissioning Soil Management Plan will be developed prior to decommissioning to account for prevailing site conditions in accordance with the principles set out in this oSMP.

5.3.45.4.10 Any excavation to remove cables or foundations etal will ~~again~~ separate topsoil and subsoil for reuse. As with the construction phase, soils will only be handled ~~soils~~ when ~~it is they are~~ in a suitable condition and weather conditions are appropriate
i.e. avoiding periods of frozen ground or wet / saturated ground conditions.

5.3.55.4.11 Access tracks composed of compacted stone will be dug out and grubbed-out. Any soil compaction will be alleviated by appropriate tillage (subsoiling or ripping to break up compact layers) before topsoil is re-spread.

5.3.65.4.12 All hardstanding (concrete pads, concrete foundations etc.) will be broken up and taken off-site. Following removal of hardstandings/aggregates the remaining soil will be tested for a range of commonly occurring pollutants such as metals, oils, concrete, and polycyclic aromatic hydrocarbons (PAHs).

- 5.4.13 Once ~~all foundations, structures, infrastructure, hard landscape elements, and impermeable surfaces associated with the Scheme~~ are ~~removed~~~~gone~~, the ~~Site's soil land~~ will be regraded ~~as required if needed~~ to remedy any depressions or mounds and then topsoil ~~will be~~ re-spread ~~and dug-in~~ uniformly. The ~~objective of these works target~~ is to return the land as close as possible to its original soil profile and level ~~to enable agricultural activity~~.
- ~~5.3.7~~ ~~As part of these works, At decommissioning~~, there may ~~need to~~ be ~~an opportunity to further augmentation to~~ improve soil quality (for example, by adding organic matter or re-seeding with appropriate species) as part of an agricultural aftercare program ~~to ensure that the soil reverts back to baseline ALC agricultural use if the land is to revert to farming~~.

~~5.3.8~~5.4.14 Monitoring will also be done post-decommissioning for a period of not less than two-years to ensure that the soil is stable (no erosion or settlement issues) and to evidence that the soil has reverted back to baseline ALC agricultural use demonstrate compliance with any restoration conditions.

~~5.3.9~~ In summary, decommissioning will be carefully managed so that the long-term legacy is a conserved soil resource that can support whatever post-solar land use is planned, be it resumption of arable farming, permanent pasture, or continued wildlife habitat.

5.4.15 Reinstatement of soil - (decommissioning phase) work compounds:

5.4.16 Reinstatement of soil - (decommissioning phase) haul routes, access tracks and heavy duty access track:

5.4.17 Reinstatement of soil - (Scheme) lagoon bund:

6.0 CONTAMINATED LAND AND MATERIALS MANAGEMENT STRATEGY

Commented [PD61]: Should this Chp not be in the oCEMP? Concern regarding duplication or conflicting MPs.

6.1 Introduction

- 6.1.1 This section addresses how excavated materials that will be generated in the course of constructing the Scheme will be re-used in a manner that is in accordance with relevant legislation and EA guidance.
- 6.1.2 The objectives are to ensure that: (a) no unacceptable risk from contamination is caused to people or the environment by the construction or presence of the Scheme, and (b) excavated materials are handled in a lawful manner, maximising beneficial reuse on site and minimising off-site disposal.

6.2 Identification of Potential Contamination

- 6.2.1 As noted in Section 2.0, the Site has no heavy industrial history and generally limited sources of potential contamination. However, there are isolated areas of made ground (e.g. backfilled ponds or former building footprints) that could contain materials with contaminants above natural background. Overall, the findings of **ES Vol 1 Chapter 12: Ground Conditions [EN010141/DR/6.1]** and **ES Vol 2 Appendix 12-1: Phase 1 Geo-Environmental Assessment [EN010141/DR/6.2]** concluded that significant contamination is not anticipated at the site; any made ground is expected to be limited and not heavily polluted.
- 6.2.2 In order to verify the absence (or presence) of contamination and to inform soil reuse planning, a targeted intrusive ground investigation would be undertaken prior to construction in any areas proposed for significant soil disturbance that coincide with suspected made ground or historical infill, as set out within the **oCEMP [EN010141/DR/7.3]**. The investigation will include areas of former ponds/pits, and the vicinity of demolished farm structures identified from old maps. The investigation will involve drilling or trial pitting to retrieve soil samples. Representative soil samples of any made ground encountered will be collected and analysed for a suite of contaminants (such

as heavy metals, PAHs, hydrocarbons, asbestos, etc.). In addition, natural strata samples may be tested for things like sulphate and pH (to inform concrete design and also as indicators of any contamination). Soil leachate tests might be done to assess risk to groundwater.

- 6.2.3 Once the site investigation results are obtained, a quantitative risk assessment will be conducted to determine if any contaminants exceed relevant screening criteria for the site's end-use. The end-use is a solar farm with essentially agricultural workers (maintenance) and grazing animals, so likely human health screening values would consider a commercial/public open space scenario and plant uptake values for grazing. If all contaminant concentrations are below appropriate screening levels (as is expected), then soils can be deemed suitable for reuse from a contamination standpoint. If any hotspots are found where a contaminant is higher than acceptable for use on-site, then a plan will be made to address this.
- 6.2.4 The contamination assessment results will directly inform the MMP under CL:AIRE. Essentially, it will categorise excavated soils into: (a) suitable for reuse (clean soil); (b) suitable for reuse with restrictions; or (c) not suitable for reuse without treatment or it must be disposed off-site as waste. By identifying these categories upfront, the MMP can designate where each soil will go. The goal, of course, is to have as much soil as possible in category (a).

6.3 Handling of Potentially Contaminated Soils

- 6.3.1 During earthworks, if evidence of unexpected contamination is encountered, the Applicant will implement an unexpected contamination protocol as set out in the **oCEMP [EN010141/DR/7.3]**. If analysis confirms contamination above relevant screening values (for human health or environmental risk), a suitable remediation or management plan will be devised before work resumes. This could include segregating the material for treatment or disposal, or implementing in-situ remediation if feasible.

- 6.3.2 All site personnel will be briefed on the signs of possible contamination and the stop-work procedure. Appropriate personal protective equipment (PPE) will be used in any suspect areas (gloves, masks, etc. as needed).

6.4 Reuse of Excavated Material (CL:AIRE DoWCoP)

- 6.4.1 The preferred strategy for the Scheme is to reuse as much of the excavated material on-site as possible in order to avoid waste generation and reduce off-site disposal. To facilitate this, the project intends to employ the CL:AIRE DoWCoP process.
- 6.4.2 Under this process, a MMP will be prepared (at detailed design) which documents all excavations and material movements, and demonstrates that any reuse of material is genuinely required and suitable. A Qualified Person will review the MMP and the supporting risk assessments and will provide a declaration to CL:AIRE prior to works, effectively confirming that the use of materials on site meets the DoWCoP criteria and can be regarded as recovery (not waste).
- 6.4.3 The key criteria that will be ensured are:
- i) Suitability for Use – chemical and geotechnical properties of the soil must be compatible with its place of reuse (e.g. clean topsoil reused in landscaping, or slightly contaminated material reused in a way that there would be no pathway to receptors);
 - ii) Certainty of Use – there must be a clear plan for the material, e.g. defined landscaping fill in the habitat area or backfill for trenches, with no indefinite stockpiling;
 - iii) Quantity – only the volume needed for the defined use will be reused (no excessive “dumping” of extra material); and
 - iv) No Pollution Risk – the reuse should not cause new pollution or harm. If these are met, the materials can be reused on site without an environmental permit, as “non-waste.”

- 6.4.4 In practical terms, for the Scheme this means topsoil and subsoil arising from excavations will be reused in reinstatement or in approved habitat creation earthworks.
- 6.4.5 Based on the assessments carried out for the Environmental Impact Assessment (EIA), there are no significant concerns regarding suitability that could impact the feasibility or application of using the DoWCoP process.
- 6.4.6 Under the MMP, specific actions will be defined for verification. Samples will be tested to confirm compliance. A verification plan will outline how the team will record volumes moved, sample the materials, and document placement locations.
- 6.4.7 Upon completion of construction, a verification report will be compiled by a competent person (and endorsed by the Qualified Person) demonstrating that all excavated materials were managed according to the MMP, and that the reuse sites meet the agreed specifications (including any clean cover or capping if required in certain areas). This report will be made available to the EA and the relevant local planning authority to give confidence that the DoWCoP was properly implemented.

7.0 SITE-SPECIFIC MANAGEMENT MEASURES

Commented [PD62]: Should not parts of this Chp be in the oCEMP? Concern regarding duplication or conflicting MPs.

7.1 Introduction

- 7.1.1 In addition to the general good practice measures outlined above, certain site-specific considerations for the Scheme warrant additional measures or emphasis. These relate to the Site's specific characteristics such as its large spatial extent (four discrete areas), the presence of watercourses and drainage features on-site, the mix of land uses around the Site, and the high proportion of best and most versatile agricultural land. Building upon the general principles, the following site-specific measures will be implemented through the construction, operational, and decommissioning phases .

7.2 Segregation of Work Areas by Parcel

- 7.2.1 The Scheme covers four main land parcels (Sites A, B, C, D) separated by public roads and distances of up to a few kilometres. Each parcel will effectively function as a separate construction zone. The soil management activities will be organised on a per-parcel (and per-field) basis. There will be no mixing of soils between these parcels unless explicitly planned.
- 7.2.2 Soil stockpiles will be located within their respective parcel to later restore the same parcel. This avoids any risk of moving soil long distances, transferring soil-born pests/diseases between areas or altering the underlying land quality. During construction planning, the Applicant will schedule the works such that one parcel can be completed and reinstated while others are still underway, if feasible. This phased approach per parcel will help in progressive restoration and limit the area of exposed soil at any one time. Separate temporary compound areas will have their own bunded topsoil and subsoil storage areas, with the origin of soils documented and recorded.

7.3 Protection of Existing Field Drainage Systems

- 7.3.1 Much of the land has agricultural field drainage (e.g. buried clay or plastic tiles) given the clayey soils and arable use. Prior to construction, known

drainage plans (if available from landowners) will be reviewed. Anticipated locations of major field drains will be marked. During trenching or piling, if a land drainage pipe is encountered, it will be carefully cut and capped. Following construction, where necessary, repairs or new drainage would be provided, e.g. new lateral drains connecting into the old system around cable routes, or reinstating the cut drains with insertion of pipe through cable trench backfill, in order to maintain field drainage functionality post-construction.

- 7.3.2 In areas where infrastructure (like the substation platform) permanently interrupts drainage, new drainage will be provided to avoid waterlogging upslope. All drain repair works will be logged, and a post-construction drainage drawing will be prepared. This measure ensures that soils do not suffer deteriorated wetness class because of the development.

7.4 Buffer Zones and Watercourse Crossings

- 7.4.1 Several tributaries drain the Site, including the Pertenhall Brook, Duloe Brook, South Brook and the River Kym. As set out above a minimum 10 m buffer from watercourses will be observed for soil stockpiles and general construction disturbance. At designated watercourse crossing points (where cabling or access must cross a ditch or brook), specific method statements will be in place
- 7.4.2 All excavated spoil from a watercourse crossing will be placed well away from the channel (outside the buffer) to prevent slumping into the channel. Once backfilled, the bank will be restored and re-seeded or matted to prevent erosion. During such works, a pollution prevention plan (including having pumps, hoses and silt traps ready) will be implemented in accordance with the **outline Surface Water Management Plan [EN010141/DR/7.19]**.

7.5 Soil Management on BMV Agricultural Land

- 7.5.1 Approximately three-quarters of the Site is BMV (Grades 2 and 3a). This higher-quality soil resource would not be lost as it will likely be returned to intensive agriculture after decommissioning. Therefore, all measures to avoid

soil structural damage (Sections 4 and 5) will be exercised with particular diligence on BMV fields. For instance, the threshold for ceasing work due to wetness might be applied even more conservatively on BMV land.

- 7.5.2 A soil specialist will advise on handling when working on the most sensitive Grade 2/3a fields (e.g. ensuring depth of strip is correct to capture full topsoil which tends to be deeper on Grade 2 land).
- 7.5.3 Post-construction, more frequent soil condition checks would be specified on BMV fields to verify they have been restored appropriately to achieve the pre-construction condition.

7.6 Adjacent Land Users

- 7.6.1 The Site is surrounded by farmland with some villages and individual properties and farmsteads in close proximity. From a soil management perspective, one consideration is to avoid impacts on neighbouring land – for example, preventing sediment run-off or dust deposition onto adjacent crops. The measures in Section 4.0 (silt fences, buffers, dust control) which would be controlled by the measures set out in the **oCEMP [EN010141/DR/7.9]** will be carefully maintained and reviewed to ensure offsite impacts do not adversely impact neighbouring land uses. Monitoring will include boundary checks after heavy rain. In addition, any topsoil storage bunds would be located cognisant of adjacent land uses and prevailing wind conditions and local topography.

7.7 Archaeological Constraints

- 7.7.1 There is known archaeological interest at the Site and it is likely that shallow topsoil stripping will be required for archaeological excavations prior to construction in some locations. Where this is required the ECoW would coordinate with the archaeological team to ensure their topsoil handling follows the approach to good practice set out in this oSMP and subsequent final SMP.

Biosecurity

- 7.7.2 No invasive, non-native species were identified within the Site during the extended habitat surveys undertaken to date. However, as set out in the **oCEMP [EN010141/DR/7.3]**, prior to the commencement of construction, an invasive species walkover survey will be undertaken during an appropriate time of year (May – October) in order to confirm the absence or presence of invasive species.
- 7.7.3 Any areas identified as containing invasive non-native species (INNS) will be suitably demarcated to ensure site staff are aware of its presence and avoid work in such areas without approval from the Ecological Clerk of Works.
- 7.7.4 If present, an Invasive Non-Native Species Management Plan would be produced prior to the commencement of work to ensure that the INNS are not spread during works. This would include measures to ensure that any soil containing INNS is managed appropriately.

8.0 IMPLEMENTATION OF MANAGEMENT PLAN

8.1.1 The Applicant will be required to adhere to the provisions of this oSMP and develop the final SMP for approval by the relevant local planning authority. This is secured via a Requirement of the **draft DCO [EN010141/DR/3.1]**.

8.1.2 An accredited agronomist ~~competent soil resource specialist~~ will be appointed to oversee soil management activities, advise on appropriate handling (e.g. confirming when soil conditions are suitable for stripping), and maintain records.

Commented [PD63]: This needs greater setting-out

~~8.1.28.1.3~~ The ECoW or environmental manager will also ensure that protective measures (for example, buffer zones around sensitive areas) are in place prior to soil works.

Commented [PD64]: Needs ref to other Management plans.

~~8.1.38.1.4~~ All site personnel will be briefed on the soil management requirements and "stop work" conditions (e.g. during adverse weather) so that they are clearly understood.

Commented [PD65]: By who, procedures, etc?

~~8.1.48.1.5~~ This oSMP provides the strategy and minimum requirements for soil and material management, but several future actions are required to develop it into the final, detailed SMP for implementation. monitoring, and enforcement:

α) **Appointment of Specialists:** The Applicant will engage ~~a suitably qualified soil specialist (e.g. soil scientist or agricultural expert)~~ to join the project team prior to construction. Similarly, a geo-environmental engineer and contaminated land specialist will be appointed to manage the geoenvironmental investigations and advise on matters relating to contaminated land and materials management. These specialists will input to the detailed SMP.

Commented [PD66]: As above

β) **Further Site Investigations:** Targeted ground investigations (both for geotechnical and contamination purposes) will be undertaken post-consent, to inform construction design and materials management. The results (e.g. chemical analysis and physical properties of soil for handling) will feed into the SMP.

- c) Further Site Investigations: Further agricultural land classification and detailed soil surveys within the Order limits prior to the construction phase, including the areas that have not been the subject of assessment. ~~soil resource surveys will be undertaken and an updated soils report will be prepared and submitted post-consent and prior to commencement of construction to inform the outline detailed Soil Management Plan.~~
- x) ~~The A soil survey will be undertaken by a suitably qualified and experienced soil scientist or practitioner in all cases.~~

Commented [PD67]: Applicant's wording to Matter 81 LIR response

Plan. This will include surveying any land currently identified as 'Ungraded' due to access limitations, and undertaking additional survey work across the remainder of the Order limits to achieve an observation density of approximately one survey point per hectare. The results of these surveys will be used to validate ALC grading and to refine the detailed SMP measures for stripping, segregation, storage and reinstatement of soils.

δ) **Preparation of a Materials Management Plan (MMP):** A project-specific MMP, compliant with the CL:AIRE DoWCoP, will be produced at the detailed design stage. This will include:

- identification of all waste streams;
- reuse routes for excavated soils;
- chemical test results and acceptable criteria;
- locations and volumes for material reuses;
- procedures for segregation; and
- contingency plans if material fails criteria.
- If necessary, a remediation strategy would be prepared for approval by the EA to support the MMP. The MMP will reference this oSMP for general measures, and will be reviewed and endorsed by a Qualified Person²²². It will then be submitted to the EA for information (through the DoWCoP Declaration process) prior to the start of excavation works.

Commented [PD68]: This is a specialist discipline: the LPA would need to out-source for review with related costs to be borne by the Applicant (Monitoring Fees).

Commented [PD69]: The Council would like to see a Outline of such a Plan prior to consent

ε) **Environmental Permits (if required):** In parallel with the MMP, the Applicant will apply for any necessary environmental permits. This could include a mobile plant permit deployment form (under a contractor's existing standard permit) for treating soils, or a bespoke permit if novel treatment is needed. The conditions of any permit will be incorporated into the SMP. For example, if a mobile plant permit requires certain monitoring (like groundwater monitoring during treatment), the SMP will include that monitoring schedule.

φ) **Consultation and Approvals:** The final SMP (noting that multiple SMPs can be developed for the different²²² construction phases of the project) will be developed in consultation with relevant stakeholders – the local planning authority (and their consultees like the Minerals and Waste team and

Natural England for soil aspects), and the EA (for contamination and waste permitting aspects). The final SMP(s) will require approval from the relevant local planning authority pursuant to a Requirement of the **draft DCO [EN010141/DR/3.1]** prior to the commencement of construction.

- γ) **Construction Method Statements:** The Applicant will produce method statements for all construction activities that interact with soils (e.g. earthworks method, drainage installation, etc.). Those method statements will adhere to the principles in this oSMP. The SMP will reference these documents, and vice versa, to ensure cohesion. For instance, a method statement for trenching will explicitly state “topsoil to be stripped and stored as per SMP Section 4.0” and will detail equipment and sequencing consistent with the plan.
- η) **Training and Tool-box Talks:** An important future step is translating the SMP into on-site practice. The Applicant will develop training materials or tool-box talks for crews, covering topics like “soil stripping do’s and don’ts,” “recognising and reporting contamination,” and “protecting stockpiles.” These will be delivered at site induction and regularly during **works**.
- ι) **Monitoring and Reporting Framework:** The final SMP will include a monitoring programme described in more detail in the following section. This will likely be presented as a table of inspections (e.g. daily soil condition checks, weekly stockpile audits, etc.) and will outline reporting requirements – e.g. monthly environmental reports during construction will include a section on soil management, any issues encountered and corrective actions taken.
- φ) **Post-Construction Review:** After the construction phase is completed, a review will be carried out to evaluate the success of soil and material management. Lessons learned (what worked well, what issues arose) will be documented. This is forward-looking to decommissioning – the knowledge gained will make the eventual decommissioning soil management easier and more effective. The SMP document may be revised at the end of construction to serve as a baseline for site operations (though minimal soil disturbance is expected in operation, it could address maintenance).

Commented [PD70]: Record and reporting

~~8.4.58.1.6~~ In conclusion, this oSMP establishes the commitments and approach to responsibly manage soils and materials for the Scheme. It will protect soil resources, ensure regulatory compliance for any waste or contamination issues, and facilitate restoration of the Site. The final SMP to follow will provide the specific instructions and specifications needed for on-site implementation, in substantial accordance with the framework and principles set out in this document.

Commented [PD71]: The SMP's principles need to demonstrate an enforceable commitment setting out works that will be undertaken to get the Site back to ALV std.

9.0 MONITORING

9.1 Monitoring

- 9.1.1 To ensure compliance with the measures set out in the oSMP, monitoring and reporting will take place throughout any phase that has the construction activity on Site to do with of the Scheme. This process will also include oversight of the resulting reporting to ensure that corrective action is taken where necessary. Details of monitoring, inspection and audits to be undertaken will be provided in the final SMP.
- 9.1.2 The ECoW will be present on Site throughout any phase that has the construction activity on Site phase. They will observe site activities and in particular will attend when new activities first occur, to ensure compliance with the SMP, raise deviations where they occur, and to monitor actions and conditions on the Site. They will also undertake regular walkover surveys of the Site to monitor compliance, and undertake regular inspections as required by the SMP. They will also meet regularly with the site manager to discuss the construction programme and any issues arising from that or their inspection/monitoring activities. They will also undertake day-to-day contact with relevant local authorities and other regulatory agencies (such as the EA).
- 9.1.3 All activities observed by the ECoW, the results of surveys and inspections undertaken by them, and reports produced by them will be documented as part of the procedures defined in the CEMP.
- 9.1.4 The ECoW/soil specialist will pay special attention at critical times, such as when stripping begins on a new field (to ensure depth is right and soil isn't wet) and after heavy rainfall (to assess if any stockpile erosion or site damage occurred). They will also monitor the condition of soils being handled such as undertaking simple tests like the hand ribbon test for plastic limit if needed to confirm that moisture is suitable. If the ECoW finds, for example, that soil is smearing under machinery, they have the authority to instruct that activity to stop until conditions improve.

Commented [PD72]: Replacement phase?
Decommissioning phase?

Commented [PD73]: Agronomist as appointed

9.1.5 If complaints are received from members of the public these will be logged by the site manager. Where necessary, the complaints will be referred to the specialists advising on soil management.

9.1.6 All complaints will be reviewed by the site manager, community liaison Officer, and environmental manager, and result of the review and any corrective actions taken will be logged. The complaints log will be reviewed for signs of wider on-going issues, and where these are identified corrective action will be taken.

9.1.69.1.7

9.2 Record keeping

9.2.1 Quality and Safety Management Systems (QMS) and Environmental Management System (EMS) will be kept by the Applicant, as set out in the **oCEMP [EN010141/DR/7.3]**. These will be certified in line with ISO 14001 standards.

9.2.2 Those systems will ensure that records are kept of monitoring, recording, and implementation of environmental management measures for the Scheme, including in respect to soil management. This is vital to ensuring that the Scheme is delivered with a high standard of environmental control throughout the construction phase, and that corrective actions are undertaken.

9.2.3 A central record keeping system will be established which will provide a repository for procedures, checklists, reports and other such measures required for the EMS and QMS. This will include maintaining records of inspections, audits, or other such activity undertaken by internal or external parties undertaking audit of the SMP. These will include the following, some of which have a broader application than the SMP but remain relevant in terms of maintaining soil quality:

- Daily Soil Handling Logs: Maintained by the site engineer or ECoW, noting areas of strip/fill, weather, volumes moved, etc.
- Monitoring Inspection Reports: Forms or checklists filled by ECoW during inspections (could be digital form with date, time, observations).

- Incident Reports: If any non-compliance or spill occurs affecting soil, a report will detail it and any corrective action taken.
- Stakeholder Communications: Records of any consultations or permissions (e.g. correspondence with the EA relating to environmental permits, or landowner agreements on drain repairs).
- Photographic Records: Before/after photos of fields, stockpiles, etc., labelled with date and location.
- Testing Results: Any laboratory analysis results of soil (for contamination or verification) along with chain-of-custody and accreditation details.
- Waste Documentation: If soil is removed off-site, copies of waste transfer notes/consignment notes.
- Permits and Consents: Copies of any permits (mobile plant permit, ordinary watercourse consent, etc.) and associated documents.
- Training Records: Sign-in sheets or records showing personnel attended soil management toolbox talks.
- Audit Reports: Internal or external audit reports evaluating SMP compliance.
- DoWCoP Documentation: The approved MMP, Qualified Person Declaration, verification report at end (this latter will compile much of the above into one report).

9.2.4 The records held in respect of the SMP will be made available for the purposes of monitoring compliance where a request is made by the relevant local planning authority.

10.0 REFERENCES

¹ Cranfield University, LandIS (n.d.). *National Soil Map of England and Wales (NATMAP)*, 1:250,000. Cranfield University, UK

² Ministry of Agriculture, Fisheries and Food (1988). *Agricultural Land Classification of England and Wales: Revised guidelines and criteria for grading the quality of agricultural land*. MAFF Publications, London

³ Department for Environment, Food and Rural Affairs, (2009). *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*. [online] Available at: <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites> [Accessed 22 April 2025]

⁴ Ministry of Agriculture, Fisheries and Food, (2000). *Good Practice Guide for Handling Soils*. [online] Available at: <https://www.quarrying.org/soils-guidance> [Accessed 22 April 2025]

⁵ Institute of Quarrying (2021) – *Good Practice Guide for Handling Soils in Mineral Workings*. Available at: <https://885685.fs1.hubspotusercontent-na1.net/hubfs/885685/Soils%20Guidance/IQ%20Soil%20Guidance%20full%20document%20including%20all%20practitioner%20advice%20updated%20May%202022.pdf> [Accessed 22 April 2025]

⁶ BRE National Solar Centre (2014). *Agricultural Good Practice Guidance for Solar Farms*. (BRE, 2nd Ed.) Available at: https://files.bregroup.com/solar/NSC_-_Guid_Agricultural-good-practice-for-SFs_0914.pdf [Accessed 22 April 2025]

⁷ Natural England, (2012). *Agricultural Land Classification: Protecting the Best and Most Versatile Agricultural Land (Technical Information Note TIN049)*. [online] Available at: <https://publications.naturalengland.org.uk/publication/35012> [Accessed 22 April 2025]

⁸ British Society of Soil Science, (2022). *Guidance Document 3. Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction*. Available at: <https://soils.org.uk/wp-content/uploads/2022/02/WWS3-Benefitting-from-Soil-Management-in-Development-and-Construction-Jan-2022.pdf> [Accessed 22 April 2025]

⁹ Contaminated Land: Applications in Real Environments, (2011). *Definition of Waste: Development Industry Code of Practice (Version 2)*. [online] London: CL:AIRE. Available at: <https://www.claire.co.uk/projects-and-initiatives/dow-cop> [Accessed 22 April 2025]



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 8 July 2026
Ref: EPE 23-02405LPA/2.10D4

RESPONSE TO DEADLINE 4 Review of [REP3-052] outline Operational Environmental Management Plan

Dear Sir,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141).

BBC Reference No.: 25/01836/DCO | Examination Ref. [REDACTED]

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: The Proposed Development comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Proposed Development also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) ([REDACTED]@bedford.gov.uk) ([REDACTED]@bedford.gov.uk) (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Planning Committee Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]

Date: 8 July 2026

[REDACTED]: Head of Planning and Building Control

Craig Austin, Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

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1.0 INTRODUCTION

1.1 Context of this Report

- 1.1.1 This report is prepared by Bedford Borough Council (the 'Council') in response to a review by the Host Authorities of the Applicant's [REP3-052] outline Operational Environmental Management Plan (oOEMP); in response to matters raised by the Host Authorities (for example within their Local Impact Reports) regarding matters/ issues to deal with environmental and habitat management; and, is submitted as part of Deadline 4 (10 July).
- 1.1.2 To aid reading, the Council's central observations are set out below, with a more detailed review and commentary of the Management Plan set out as track changes and/or comments within the Applicant's Management Plan itself, attached as an Appendix.
- 1.1.3 Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submitted under separate cover for individual procedural sign-off purposes.
- 1.1.4 This review remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification within any further updated submitted material or similar to the Examination. The Council remains open to discussion.
- 1.1.5 This Report is solely that of Bedford Borough Council, submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

1.2 Council's Review and Observations

- 1.2.1 **Observation 1:** it is suggested that the [REP3-052] outline Operational Environmental Management Plan should act as inter alia an 'Introduction to Management Plans' cover document: it is suggested that the stand-alone 'Introduction' is then applicable to and referenced only with full weight in all other Management Plans; this could cover:
- a) 'Scheme Description' (description as set out in the DCO Application as applied for).
 - b) 'Site Context' (very short as this is referenced in greater detail across the ES).
 - c) Roles & Responsibilities (to ensure consistency of all FTE and PTE); identify stakeholders; identify communication contact points; etc.
 - d) Outline implementation protocols, reporting, audits, etc., with detailed management systems/ documents, etc. set out within each individual management plan. This will allow a Scheme-wide/ collective understanding of roles vs responsibilities vs implementation protocols vs across phasing, etc. This is currently very unclear.
 - e) 'Relationship with Other Management Plans' – emphasising that this is a suite of documents that need to be read both singularly and collectively. There is currently absolute concern on behalf of the Council that as presented there may be gaps of intent, gaps of mitigation/ enhancement works, gaps in management and delivery commitments, etc. between the various MPs which are/ have not been identified/ addressed (by example there is no operational transport management plan, this is only addressed as commitments set out in the [REP3-075] Technical Note). A diagram

that shows the phase-duration, review periods, etc. of each management plan and how this leads into the next phase may aid understanding.

- f) The 'Introduction' would give/aid absolute clarity regarding phases, replacement campaign, and critically programme of works (monthly, seasonal, annual, 10-years) etc. against each phase.
- g) It is noted that this 'Introduction' document would need weight/ reference within the DCO Agreement.

By way of this approach this may prevent duplication of standard statements between management plans, focus the plans to within their specific remit, and aid reading across the various management plans.

It is suggested that this is the very purpose of the OEMP but this clarity and structure is currently not evident.

1.2.2 Observation 2: obligations:

- a) The specific legislative and planning policy requirements/ compliances; and,
 - b) The specific DCO Agreement's schedules and requirements
- should be set out against each individual Management Plan to create an understanding within each MP of the compliance, management, and enforcement framework. This is currently not apparent.

1.2.3 Observation 3: in all cases, the Management Plan(s) need to be SMART (acronym):

- a) Specific, Measurable, Achievable, Relevant, Time-bound. There is currently a real concern by the Council that the management plan remain too generic. SMART is an acknowledged, international management tool for such very purposes.
- b) The oOEMP need absolute clarity of terms/ terminology/ wording that is consistent with the definitions set within the DCO Agreement.
- c) There needs to be a review of the word '*temporary*' – this should be changed to refer to a specific development phase against a specific, individual work programme.
- d) The general terminology of the management plan should be one of a stated commitment – 'shall', 'will', 'enact' rather than may, could, 'subject to'; i.e. where the Applicant has given an undertaking against the Environmental Statement or responses these need an absolute statement of mitigation/ delivery/ enactment etc. within the management plan.
- g) The management plan(s) should address the aspect of failure - the OEMP/other should set out what happens in case of default, catastrophic failure of delivery against the ES commitments (e.g. landscape works); the OEMP should set out a strategy of undertaking i.e. reinstatement works, habitat surveys, notifications and planning regime commitments, rectification periods programmes, funding and/or bond securities, on-site resourcing, long-term monitoring to attain ES commitment. Most of the management plans reviewed by the Council are silent on this matter.

1.2.4 Observation 4: in response to the matter raised by the Council in their Local Impact Report regarding an approach to the replacement activity/ works of Scheme infrastructural

components, and the request by the Council that these works should be identified within a Replacement Phase, the Applicant has prepared the [REP3-075] 'Technical Note on Replacement Works' which sets out an approach to such works. While the Council's response to the Applicant's suggestion is addressed in the 'Cover to Technical Note; July 2026' submitted as part of Deadline 4, the various commitments made by the Applicant in the Technical Note should find their way into all management plans, with specific reference to the OEMP.

While the Applicant has stated that this review has been undertaken, the Council suggests that the clarity of intent of the replacement campaign' works as set out in the Technical Note does not find itself into the various management plans, and could benefit from a sub-section within the OEMP.

1.2.5 **Observation 5:** as part of the preparation of the Environmental Statement (ES), the Applicant identified and committed to both mitigation AND enhancement measures. It is suggested that the OEMP, and related management plans, make specific reference to each individual measure to create a baseline of objectives (measures) that over time can be surveyed, monitored, remediated, and enforced as then set against Scheme delivery programme (e.g. the LVIA was prepared on the basis that after 10-years the landscape would screen the Scheme. How does the OEMP address and monitor the attainment of this objective?).

1.2.6 **Observation 6:** as part of tabling [REP3-052] oOEMP, the Applicant makes reference to the following Appendixes which have not been included. As noted across the review of all management plans, the Council would like to see an intent framework/ template of the following as committed to by the Applicant; namely:

- a) Environmental Incident Management and Pollution Prevention Plan (EIMP) template (see [Ref. BBC-RR-136]).
- b) Unexpected Contamination Protocol template ([REP3-075]; Technical Note para3.9.1)).
- c) Emergency Response Plan template ([REP3-052] oOEMP, para 4.1.44-47).
- d) Flood Warning and Evacuation Plan template ([REP3-052] oOEMP, para 4.1.57).
- e) Complaints Register template ([REP3-052] oOEMP, para 4.1.62).

As it currently stands, the Council has not seen evidence of even the framework of some of these proposed documents - this is viewed as a significant concern as the Council needs to have clarity as to their long-term planning involvement/ commitments as local planning authorities in reviewing/ monitoring the management, maintenance, and enforcement measures of the Scheme; and, in terms of any agreements reached within the Examination.

1.2.7 **Observation 7 (enforcement):** the Council suggests that there is no consistency and/or clarity between the various management plans, the Scheme phases (Construction, Operational & Decommissioning), and to the DCO Agreement to give the Council sufficient confidence on how the management plans are to be used and how they allow enforcement should this be required. It is suggested that the OEMP is the central management document that should enable this.

1.2.8 **Observation 8 (replacement):** in response to [REP3-052] oOEMP, the Council suggests that the proposal for the 20% replacement as a trigger is not appropriate and it would be better to reflect the step change from operation to at scale replacement.

- 1.2.9 Whilst accepting the impact is *less than* at the construction phase, replacement at scale 20 years or more into the operation where staff levels, traffic, and materials to and from site are very low, even one field of PVs is a significant change. Equally some impacts will be new. For example, the haulage road will not be in place at the operational stage and therefore new vehicle movements will occur. (See comment below regarding movement of HGVs).
- 1.2.10 Therefore, a trigger that better represents at scale replacement activity prompting a significant change in impacts from that of operation is preferred. For example, an increase in staff on site over a defined period of time, or replacement of panels taking place for 3 months or longer in a 12 month period.
- 1.2.11 Whilst it is welcome that the Applicant states that any at scale replacement will adhere to the Construction Environmental Management Plan et al, the Council believes the Applicant needs to demonstrate ahead of any replacement that an assessment of the impacts have been carried out and that the mitigation measures as proposed are appropriate and agreed to by the Council. Discussions are ongoing with the applicant to resolve this matter through further updates to the Management Plans.
- 1.2.12 It is noted that the above matter is addressed in greater detail within the Council's review of the [REP3-075] Technical Note on the Replacement Works, submitted as part of Deadline 4.
- 1.2.13 **Observation 9 (highways):** in response to [REP3-052] OEMP Table 5.5 –
- a) *'Prior to any planned replacement of a centralised inverter or solar transformer within Site A, Site B or Site C, ...'*: the Council would like to understand why site D is not included.
 - b) *'...the Site Operator must notify the relevant local highway authority or authorities not less than 28-days in advance'*: the Council considers 28-days is too short a notice period, especially if there is to be any review of identified impacts and the mitigation measure proposed by the Applicant.
 - c) Traffic management measures need to be approved in accordance with the local highways process for all traffic management on the public highway. Note the highway authorities are in discussions with the Applicant relating to highways protective provisions or a highways legal side agreement that may include the process to approve traffic management measure.
 - d) It is suggested that HGV movements extending through Great Staughton. At the construction phase this was avoided by the use of an internal haulage route. It is appropriate to avoid at the replacement phase too wherever possible (noting transformers and inverters are suggested on the same page as needing to be transported by HGV). Elsewhere it is suggested smaller fixed axle vehicles as being the largest type of vehicle to be used during operation. HGVs deliveries should where possible be restricted to site D.
 - e) The Council welcomes the avoidance of peak hours, including drop off and pick up times in front of the primary school, as well as to notify the highway authority. This would be appropriate to include when, as suggested above, the Applicant demonstrates to the authorities it has assessed the impacts, and the proposes mitigation measures to address these.

2. CONCLUSIONS

- 2.1 As currently tabled and as reviewed by the Council, the [REP3-052] outline Operational Environmental Management Plan is lacking detail, clear commitments, and assurances as would be required of a long-term (40-year) management strategy. On this basis, the oOEMP is NOT Supported.

PD-QA/7pg end

Appendix A: [REP3-052] outline Operational Environmental Management Plan – Track Changes



EAST PARK ENERGY

East Park Energy

EN010141

Outline Operational Environmental Management Plan

[REP3-052]

BBC/HA Review (8 July 2026):

Please note that this is a joint co-ordinated review undertaken by the three Host Authorities, submitted under separate cover for individual procedural sign-off purposes.

This review, as attached to a cover letter, remains in DRAFT with the understanding that the Applicant may/ will address observations/ comments and matters of clarification as set out in the review below within any further updated submitted material or similar to the Examination.

The review is submitted without prejudice and the Council reserve the right to comment further as may be necessary.

The reference to 'Council' (singular) should be read interchangeably with the term 'Host Authorities' (plural).

Document Reference: EN010141/DR/7.5

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

May 2026
Version P03

EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Outline Operational Environmental Management Plan

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/7.5
Author:	Axis PED Ltd

Version	Date	Status
P01	September 2025	DCO Submission
P02	April 2026	Deadline 1
P03	May 2026	Deadline 3

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TABLES

Table 2.1: Indicative Operational Lifespan of Scheme Components

Table 5.1: Summary of the operational mitigation and management measures
– Landscape and visual

Commented [PD1]: It is noted that the Applicant has stated that they would prepare supporting material etal against this management plan. These are referenced in the created appendix list.

Table 5.2:	Summary of the operational mitigation and management measures – Cultural Heritage
Table 5.3:	Summary of the operational mitigation and management measures – Ecology
Table 5.4:	Summary of the operational mitigation and management measures – Hydrology and Flood Risk
Table 5.5:	Summary of the operational mitigation and management measures – Traffic and Transport
Table 5.6:	Summary of the operational mitigation and management measures – Noise and Vibration
Table 5.7:	Summary of the operational mitigation and management measures – Air Quality
Table 5.8:	Summary of the operational mitigation and management measures – Ground conditions
Table 5.9:	Summary of the operational mitigation and management measures – Land and Soils
Table 5.10:	Summary of the operational mitigation and management measures – Socio economics
Table 5.11:	Summary of the operational mitigation and management measures – Climate change
Table 5.12:	Summary of the operational mitigation and management measures – Waste

COUNCIL'S OBSERVATIONS:

The Applicant is referred to the Cover Letter: Response to Deadline 4 – review of [REP3-052] outline Operational Environmental Management Plan (7 July) which sets out the executive observation of the Council's review on this Management Plan.

1.0 INTRODUCTION

1.1 Background

- 1.1.1 This outline Operational Environmental Management Plan (oOEMP) has been prepared for the operational Phase of the East Park Energy project ('the Scheme').
- 1.1.2 The Scheme is classified as a Nationally Significant Infrastructure Project (NSIP) and therefore BSSL Cambsbed 1 Ltd ('the Applicant') is applying for a Development Consent Order (DCO) to construct, operate and decommission the Scheme. The Scheme is 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), requiring an Environmental Impact Assessment ('EIA').
- 1.1.3 The purpose of this oOEMP is to set out how the necessary environmental mitigation and monitoring, identified as part of the EIA and set out in the Environmental Statement (ES), will be delivered during the operation of the Scheme.

1.1.4 This oOEMP is a control document that will be implemented via a requirement in Schedule 2 (Part 1, Article 9) of the draft DCO [EN010141/DR/3.1]. Should the Scheme be consented, the final OEMP(s)¹ produced for any phase of the Scheme will be in substantial accordance with this oOEMP, and approved by the relevant local planning authority (LPA) before construction commences

1.1.4.1.1.5 This oOEMP is concerned with the operational phase of the Scheme, the following documents cover the separate construction and decommissioning phases:

- Construction phase – **outline Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3];** and

¹ As such, references to 'the OEMP' within this oOEMP should be considered as meaning any OEMP that is brought forward.

- Decommissioning phase – outline Decommissioning Environmental Management Plan (oDEMP) [EN010141/DR/7.6].

~~1.1.5 If the DCO is granted, prior to the date of final commissioning for any phase of the Scheme this oOEMP will be developed into a final Operational Environmental Management Plan (OEMP) for that phase². Any OEMP brought forward will be substantially in accordance with this oOEMP as set out by a Requirement of the draft DCO [EN010141/DR/3.1] and submitted to and approved by the relevant Local Planning Authority (LPA).~~

1.1.6 Nothing in this oOEMP will prevent the modification or omission of the control measures set out in section 4 and 5 where the methodology means that the measures can be so modified or omitted. This will be confirmed (including confirming that the absence or change to such control measures will not lead to any materially new or materially different effects which are worse than those reported in the ES) at the time of submission of the final OEMP for approval.

1.2 Document Structure

1.2.1 This oOEMP is structured as follows: SMART (in terms of the ES)

- **SPECIFIC** Introduction – provides an introduction to the document and defines the structure of the oOEMP;
- **SPECIFIC** Scheme Description – provides a summary of the Site and site context, a description of the Scheme, ~~and sets out a summary of the expected operational activities;~~
- **SPECIFIC** Roles & Responsibilities – sets out the Operator's roles and responsibilities that will need to be defined at the operational phase, and identifies statutory stakeholders relevant to the Management Plan, ~~environmental management of the operational phase;~~
- **MEASURABLE** Operational Environmental Management – sets out principles/ assessed and committed Objectives to be attained, and site

Commented [PD2]: Management Plans should ensure that the plan is SMART with absolute clarity of terms that are consistent across the DCO relate back to the definitions set within the DCO Agreement.

²As such, references to 'the OEMP' within this oOEMP should be considered as meaning any OEMP that is brought forward.

rules to be applied in the operation of the Scheme, and how communication with third parties will be undertaken during operation;

Commented [PD3]: Communication should be within Roles & Responsibilities to attribute an action.

- **ACHIEVABLE Environmental Mitigation Measures** – sets out the environmental enhancements, management, and mitigation actions and works/measures that will be undertaken ~~are required~~ to address the effects of the Scheme ~~during the operational phase~~, as ~~relied-assessed on~~ or identified in the ES or committed to in the Applicant's responses to the Examination;
- **RELEVANT Implementation of Management Plan** – provides a summary of the key measures, including statutory authority measures/powers, ~~that will must~~ be within the final OEMP to ensure successful implementation of the final OEMP; and
- **TIME-BOUND Monitoring and Maintenance** – sets out the annual and Scheme -duration programme of works, procedures for monitoring, and ensuring attaining compliance with the objectives assessed in the ES/OEMP, as well as the management requirements for record keeping for the duration of this phase.

1.3 Relationship with Other Management Plans

1.3.1 This oOEMP is part of a framework of environmental management documents that will be implemented during the operational phase of the Scheme. The final OEMP will work alongside several other specific management plans, which provide further details on mitigation and management measures.

1.3.2 The following will be developed separately to the final OEMP, pursuant to DCO Requirements:

- **Surface Water Management Plan (SWMP):** This plan will detail site-wide measures for drainage, rainfall runoff management, including flood risk mitigation and the containment of firewater runoff from the Battery Energy Storage System (BESS).
- **Public Rights of Way Management Plan (PRoWMP):** This plan will ensure the maintenance of existing PRoWs, the implementation of new

permissive paths, and the provision of wayfinding signage to guide public access across the Site.

- **Landscape and Ecology Management Plan (LEMP):** This plan will set out measures for landscape planting, habitat management, and biodiversity net gain, ensuring that mitigation planting and screening vegetation are effectively maintained.
- **Battery Safety Management Plan (BSMP):** To outline fire safety, containment measures, and emergency response procedures for the BESS system during its operation. This will be accompanied by an Emergency Response Plan.
- **Soil Management Plan (SMP):** This plan will ensure the sustainable management of soils and materials by setting out strategies for handling, storage, reuse, and disposal, minimising waste, preventing contamination, and protecting soil health throughout the construction, operation, and decommissioning phases of the project.
- **Skills, Supply Chain and Employment Plan (SSCEP):** This plan will ensure local economic benefits by setting out strategies for local job creation, workforce training, and engagement with regional suppliers throughout the construction, operation, and decommissioning phases of the Scheme.
- **Archaeological Mitigation Strategy:** This document will present the approach to the management of archaeological remains, both known and currently unknown, across the lifetime of the Scheme. It sets out how the mitigation measures and monitoring requirements will be implemented during construction and has been prepared with the objective of compliance with relevant legislation and policy.
- **Heritage Enhancement Strategy:** This document sets out the measures that will be adopted to increase the ability to understand, appreciate and experience buried heritage assets at the Site.

1.3.3 The following plans will form part of the final OEMP, or be submitted alongside it:

Commented [PD4]: As noted in the respective Management Plans, we would want to see an indicative intent and/or structure against each of these supporting plans prior to agreeing the Outline Plans

- **Invasive Non-Native Species Management Plan (INNSMP):** This plan will outline monitoring and control measures for invasive species, ensuring that any non-native species identified at the Site are effectively managed to protect biodiversity.
- **Environmental Incident Management and Pollution Prevention Plan (EIMP):** This plan will provide a structured response framework for fuel or chemical spills, unexpected contamination events, and pollution control measures to prevent impacts on watercourses and groundwater.
- **Unexpected Contamination Protocol (UCP):** ~~If unexpected contamination is encountered during operation,~~ this protocol will detail the procedures for risk assessment, reporting, remediation and verification if unexpected contamination is encountered during operation.
- ~~1~~
- **Flood Warning and Evacuation Plan (FWEP):** This plan will set out flood preparedness measures, warning systems, and emergency response actions in the event of extreme weather-related flooding.
- **Waste Management Plan (WMP):** This plan will set out procedures for the management of operational waste, ensuring compliance with the Waste Hierarchy and regulatory requirements.

Commented [PD5]: See comment re. Introduction to Management Plans report

1.3.4 Each of these plans will contain specific monitoring and reporting requirements, which will be reviewed regularly, as a minimum annually, by the Site Manager, Environmental Manager, and relevant statutory regulatory and local planning authorities. Monitoring results will be documented as part of the compliance framework for the operational phase.

Commented [PD6]: These statements would be better placed against the various roles to ensure singular clarity of each role.

1.3.5 If the DCO is granted, each of the above Management Plans and supporting material plans will be developed into a final document ~~prior to the date of final commissioning for any phase of the authorised development, with and submitted to approval by~~ the relevant LPA for written approval prior to enacting the works. (following consultation with the relevant bodies on each plan as set out in the DCO).

- 1.3.6 The final OEMP and the associated management plans will be reviewed and updated periodically as a minimum annually. to ensure continued compliance with ~~statutory~~regulatory requirements and best practice standards.

2.0 SCHEME DESCRIPTION

To aid reading, clarity, actions and enforcement by third-parties and/or statutory authorities may the Council suggest that:

a) Chp2. Addresses

- Scheme Description' (very short, description as applied for)
- 'Site Context' (very short)
- That each Relationship with specific schedule and requirements

- There is a danger that within the current 62pgs the actual Management Plan is consumed by background information rather than specific actions/ instructions.
- It is suggested that this reduced Chp gives some planning and legal context to the Management Plan, hence an inclusion (as suggested below).

4.42.1 The Scheme

~~1.4.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.~~

~~1.4.2 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity to the National Grid, as well as the storage of up to 100 MW of electricity in the BESS.~~

2.1.1 As set out briefly in ES Vol 1 Chapter 1: Introduction [EN010141/DR/6.1], the Scheme comprises a new ground-mounted solar photovoltaic energy generating station with a total capacity exceeding 50 megawatts (MW) and an associated on-site battery energy storage system (BESS) and 400 kV substation on land to the north-west of St Neots. The Scheme would allow for the generation and export of 400 MW of electricity to the National Grid from the solar photovoltaic energy generating station, and would be capable of exporting and importing up to 100 MW via the BESS.

2.1.2 The design life of the Scheme is 40 years, with decommissioning to commence 40 years after final commissioning.

Commented [PD7]: As taken from the ES Vol1

2.1.3 Text

4.4.32.1.4 A more detailed description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

4.52.2 The Site

4.5.42.2.1 The Site is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council and Huntingdonshire District Council. The site location is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**.

4.5.22.2.2 The Site area extends to approximately 773 hectares (ha). The Site includes all land for the solar development, BESS, landscaping, cabling, access and grid connection.

4.5.32.2.3 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, for ease of reference the Order Limits have been subdivided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.
- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road,

Commented [PD8]: Applicant to reference requirements and schedule within the DCO Agreement that are applicable to this MP.

and an unnamed road between Little Staughton and Great Staughton Road.

- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary, and from Little Staughton Road to the north-west.
- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

4.5.42.2.4 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are also shown on **Figure 1-2** and identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and an arable field.
- **Grid Connection – Site D to Eaton Socon Substation** – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

Commented [PD9]: Simplify as suggested against other reviews undertaken

4.6.2.3 Site Context

4.6.42.3.1 The Site is located on the south side of a broad shallow clay vale landform formed by a number of west-east tributaries to the River Great Ouse, which flows north-south to the east of the Site through the town of St Neots approximately 3.7km east of Site D.

4.6.22.3.2 The local landscape is generally more undulating than the Site which is located predominantly in a low-lying area with relatively limited topographic variation. The landform rises to the north of the Site towards Grafham Water,

to the west of the Site towards a ridgeline beyond Swineshead, and to the south of the Site towards a high point around the Bedford Aerodrome.

4.6.42.3.3 The landscape pattern of the local area is broadly consistent, comprising medium- to large-scale arable farmland interspersed with blocks of woodland, particularly in the more elevated parts of the landscape to the north of the Site.

4.6.42.3.4 The local settlement pattern is dispersed and typically rural in character comprising occasional distinct village settlements. From west to east the principal settlements in closest proximity to the Site are Swineshead, Pertenhall, Keysoe, Keysoe Row, Little Staughton, Great Staughton, Hail Weston, and Duloe. The town of St Neots lies east of the A1 to the east of the Site and is the largest settlement local to the Site. Outside of the settlements there are occasional individual properties and farmsteads including some in close proximity to the Site. The following properties lie 'inset' within the Order Limits, in that they are excluded from the Order Limits but surrounded by the Site:

- Lodge Farm, a residential property with associated equestrian land uses inset within Site B to the north-west of Little Staughton; and
- The Kangaroo, a former public house which is now a residential property and dog kennels inset within Site B at the junction between Little Staughton Road and Staughton Road.

4.6.52.3.5 Neither the Order Limits nor the surrounding area are covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The Order Limits are also not within any locally designated (non-statutory) landscapes.

4.6.62.3.6 There are no statutory nature conservation designations within the Order Limits. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site. The closest 'European site' (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Order Limits, to the north-west. Further detail on nature conservation

designations is set out within **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**.

4.6.72.3.7 The following non-statutory nature conservation designations are adjacent to the Site:

- Kangaroo Meadow County Wildlife Site, which is adjacent to Site B and is recognised for the presence of neutral grassland; and
- Huntingdon Wood County Wildlife Site, which is adjacent to the south side of the grid connection between Site D and the Eaton Socon Substation.

4.6.82.3.8 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of the environmental assessment of the Scheme has discovered the site of a Roman Town in Site C. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to designate the area as a Scheduled Monument. The application was accepted and the archaeology was designated as a scheduled monument in September 2024. The location of this Scheduled Monument is shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

4.6.92.3.9 There are no other statutory designated heritage assets within the Order Limits. There are a number of listed buildings located within the vicinity of the Order Limits, in and around the settlements of Pertenhall, Keysoe, Swineshead, Little Staughton, Great Staughton and Duloe. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary. The Order Limits are not covered by any conservation areas.

4.6.102.3.10 The Order Limits are located predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 associated with Pertenhall Brook to the west

through Site A; with an unnamed watercourse through Site B; and with the River Kym to the north of Site C.

~~4.6.112.3.11~~ The Order Limits are crossed by a number of existing utilities including high pressure gas mains and overhead electricity lines, the required easements of which would be excluded from the solar development area. Cabling across these areas would be in accordance with all required standards.

4.7.2.4 Operational Phase Activities

2.4.1 Programme: the Scheme's anticipated programme is: ~~Subject to the Scheme securing a Development Consent Order it is anticipated that:~~

a) ~~The construction phase is expected to last for approximately 30-months, based on experience of constructing other similar-scale installations. Subject to the Scheme securing Development Consent in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030 such that it aligns with national Clean Power 2030 objectives). For the purposes of the Environmental Statement (ES), a 30-month programme has been assessed (Ref. [APP-038], Chp 2.5).~~

b) ~~The operational phase would start no earlier than mid-2030 (following the completion of construction). The Scheme would then be operated by the Operator for approximately 40-years, with decommissioning assumed to be no earlier than 2070.~~

c) ~~Decommissioning is expected to take between 12 and 24 months, subject to the requirements of and would be undertaken in phases. However, for the purposes of the Soil Management Plan, the post-decommissioning window is assumed to be five-years to align with NPS EN5 site restoration timeframes (Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration~~

Commented [PD10]: Simplify (this is currently a full C&P from ES Vol1).

Further to the MP, it may be more useful to set-out the SMART environmental, habitat, and habitat planning policy constraints that are within an/or surround the Site that the Operator will need to take due consideration of as assessed in the ES - with those commitments.

Commented [PD11]: Applicant's provisional statement (Ref. LIH revert).

Typically, ALC assessment would be undertaken 5 years after the decommissioning and so this 5-year window is required. Rather than a concluding SMP as proposed in the para below, this window will remain open until the land is restored to the baseline conditions with a SMP only if additional works are required in addition to the decommissioning SMP. This commitment means that less specificity is needed in the additional paragraphs added to this version of the document. (EB; PD)

Applicant to address.

of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites).

2.4.2 Operational 'hub': the day-to-day management and maintenance of the Scheme will be undertaken from the Operations and Maintenance Building in Site D ([APP121] Site D Figure 2-1k) comprising a storage, operations and maintenance building (housing staff welfare facilities), BESS, and Substation infrastructure. The purpose of this building area is the storage of site management and maintenance equipment, which will include plant and machinery not only for maintaining the infrastructure components of the Scheme, but also for maintaining the extensive habitat and landscape proposals.

Commented [PD12]: Or similar as taken from the Technical Note 2.2.1

4.7.42.4.3

Operational Workforce and Activities

2.4.4 Access: all access off the public highways for the Operational Phase will only be from those access points as consented. Access and movement within the Site will be on heavy-duty access tracks and access tracks as consented [APP-121] Illustrative Environmental Masterplan. During the operational phase, access to the Site would principally be to the East Park BESS and Substation, and to the wider site for routine maintenance operations, replacement of equipment, habitat management, and farming activities.

2.4.5 Full Time Employment (FTE) resourcing: as assumed and assessed within the ES [APP-050], it is expected that there would be 20 gross direct full time equivalent (FTE) roles for the Scheme during the operational phase covering the following various activities:

Commented [PD13]: This may better be placed with the Resource Chapter

- a) 12No. ,this would breakdown broadly: as twelve FTE roles working on site maintenance;
- b) 5No. ,five FTE roles working in management and administrative roles; and,

c) ~~3No. - and three FTE roles working in~~ land management including landscape maintenance ~~and agriculture~~.

Commented [PD14]: Taken from PP-050] para 14.8.33

4.7.2

4.7.2.4.6 At times when significant replacement campaigns are required, e.g. large-scale replacement of solar PV array areas, or multiple transformer or battery storage units, then more staff and specialist equipment (cranes and low loaders) would be required. Table 2-1 below sets out assumptions regarding the operational lifespan of key individual components of the Scheme.

Commented [PD15]: This may better be placed with the Resource Chapter and needs reference to Technical Note

4.7.2.4.7 Maintenance access to the Site would be by a small van or similar and the storage, operations and maintenance building would contain spare equipment and tools for routine repairs and maintenance. Operational access would be via the existing public highway with limited traffic movements expected.

Commented [PD16]: This needs updating to reflect the statements regarding vehicles, access, site movement made in the Technical Note

4.7.2.4.8 Along the cable corridors activity will comprise routine inspections and any reactive maintenance, for instance where a cable has become damaged.

4.7.2.4.9 The on-site substation (set within the Scheme) will be managed and maintained by the operator of the site. Eaton Socon Substation will be managed and maintained by National Grid.

Periodic Replacements

Commented [PD17]: This should now be update to reflect the commitments/ statements made in the [REP3-075] Technical Note

2.4.10 As set out above, during the operational phase of the Scheme, periodic replacement of equipment will be necessary to maintain operational efficiency and reliability.

This should be set out as follows to give absolute clarity:

1. Routine management works
2. Routine maintenance works (included isolated replacement)
3. Replacement works (c. Major Replacement Campaign)
4. Monitoring leading to extraordinary works (e.g firewater/ other spillage, contamination, habitat failure, force majeure)

Noise: intent set out in Applicant's Technical Note §3.7.4 should find some address in this MP

1.7.7

4.7.82.4.11 Routine inspections and assessments will be conducted to determine the condition and performance of solar panels, solar balance of plant, battery storage units, and other associated infrastructure set out in Table 2-1. Equipment identified as reaching the end of its functional lifespan or showing reduced operational performance will be scheduled for replacement.

4.7.92.4.12 Given that replacement activities will not be a frequent occurrence; large scale replacement activities will not form part of the routine operation of the Scheme. The characteristics of the Site mean that impacts (including to highways) from replacement activities will be limited and can be controlled predominantly by the measures set out in this oOEMP. As such it is not proposed that the final OEMP submitted for approval will include details of specific measures to be put in place for large scale replacement activities.

Table 2.1: Indicative Operational Lifespan of Scheme Components

Scheme Component	Indicative Operational Lifespan (as assessed within the ES)
Solar Panels	20 – 40 years (a single replacement per installed panel and 10% contingency is assumed)
Mounting Structures	40 years
String Inverter	20 years
Centralised Inverter	20 years
Solar Transformer	20 – 40 years
Battery Storage Unit	20 years
Battery Transformer	20 – 40 years
Auxiliary Transformer	20 – 40 years
400 kV / 33kV Transformers	40 years

Commented [PD18]: This statement is NOT supported by the Council. In response to this specific matter/ concern raised from inception of consultation with the Council, the Applicant prepared the Technical Note with statements and/or commitments of work - these need to be incorporated into the oOEMP.

Council Observation No. 1

Scheme Component	Indicative Operational Lifespan <u>(as assessed within the ES)</u>
Cabling	40 years (20% replacement anticipated due to defects)
Fencing	10 – 20 years
CCTV	10 – 20 years

~~4.7.102.4.13~~ 4.13 Instead, the OEMP will provide that, prior to any replacement activities which involve replacement of more than 20%³ of the solar panels within the Scheme within any 12 month period, a notification must be submitted to the relevant LPA for approval with details of the management measures that are proposed to be put in place for those replacement activities, that are consistent with the principles of the CEMP, PRoWMP, CTMP and OEMP that had been approved for the construction for the Scheme, but are also commensurate to the scale of activity proposed.

Commented [PD19]: See Council Observation No. 1 above

Panel Cleaning

~~4.7.112.4.14~~ 4.14 Solar PV panels generally require little maintenance, as natural weather conditions help keep them clean. Any reduction in efficiency due to dust or dirt accumulation is usually negligible, however, site-specific conditions can influence the need for cleaning.

~~4.7.122.4.15~~ 4.15 Since performance loss from dust and dirt accumulation is typically low, the decision to clean panels must be balanced against operational costs, with annual cleaning generally not considered cost-effective. It is therefore assumed as a precautionary worst-case scenario that the panels will be cleaned on a biennial basis. The precise cleaning requirements will however

³ Given the conclusions of the construction assessments for the Scheme and that replacement activities will cause less effects this is considered to be a reasonable figure for replacement activities to be considered 'large scale' such that they may require the identification of more extensive management measures.

only become clear once the Scheme is operational, and it is reasonably likely that this requirement will be less frequent than a biennial basis.

~~4.7.13~~2.4.16 Although cleaning technologies are advancing, it is currently assumed that a tractor mounted system would be used, as this is the most commonly used method. A tractor mounted system features a soft rotating brush, similar to those found in car washes.

~~4.7.14~~2.4.17 Where panel cleaning is required during the operational phase, this will be undertaken using water and mechanical brushing only. No chemical cleaning agents will be used for panel cleaning.

2.4.18 To prevent damage, cleaning will typically take place at night or when the panels are cool, reducing the risk of damage to the panels. If undertaken at night, the process will be illuminated using tractor-mounted lights, similar to those used in night-time agricultural work.

2.4.19 Cable replacement works

~~4.7.15~~2.4.20 Replacement campaign notification

Vehicular Access 7 bays

~~4.7.16~~2.4.21 There would be maintenance vehicles retained onsite, most likely tractors, trailers and bulk tankers, along with smaller light goods vehicles (LGVs). These would be used to transport spare components, tools and equipment around the Site, and to undertake landscape maintenance and solar PV module cleaning. These would be stored within? at the operations / spares building within Site D, ~~or within the operations building store area~~.

~~4.7.17~~2.4.22 There would be no requirement for any regular heavy good vehicle (HGV) access, with the vast majority of the routine maintenance, and associated deliveries, undertaken by LGV.

Public Rights of Way

~~4.7.18~~2.4.23 ~~Refer to the During the operational phase all existing PReW would be maintained on their existing alignment, and it is not expected that any~~

Commented [PD20]: But this is outside the stated 'Working Hours' and may cause noise disruption to adjoining properties - this activity was NOT scoped in the ES and is not supported.

Commented [PD21]: This should now be update to reflect the commitments/ statements made in the [REP3-075] Technical Note.

Commented [PD22]: See BBC's comment on Technical Note

Commented [PD23]: It is critical to note that [APP-121] Illustrative Environmental Masterplan only shows 7 staff vehicle parking bays which were assessed within the ES. The visual impact of maintenance/ management vehicles continually on Site has never (in our reading) been mentioned before. There is an absolute concern that the operational area is visually and functionally becoming a 'builders yard' and that appropriate screening may be requested. This is currently NOT addressed.

Note, the masterplan only refers to a building, not a yard.

~~diversions or stopping-up of PRow is required. The~~ outline Public Rights of Way Management Plan [EN010141/DR/7.8] which describes how the PRow within the Order Limits, ~~and newly created permissive paths,~~ would be managed during the operational phase over the lifetime of the Scheme.

Commented [PD24]: These are set out in the oLEMP?

Habitat (Vegetation and fauna) Management

~~1.7.19~~2.4.24 A range of different habitat and land management prescriptions would be required to deliver the landscape outcomes envisaged for the Scheme. These are set out within the **outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7]** which supports the application. Post-consent, this outline plan will be developed into a final plan which must be in substantial accordance with the outline and will require approval by the Local Authorities. The Scheme must be operated in accordance with the approved plan. This is secured via a Requirement in Schedule 2 of the draft DCO [EN010141/DR/3.1].

Commented [PD25]: As above.
There is concern that this text may conflict with that set out in the referenced MP; rather refer to.

~~1.7.20~~2.4.25 The oLEMP [EN010141/DR/7.7] sets out the management prescriptions and target habitat conditions for the various landscape features proposed. Monitoring processes are also prescribed to record the progress of establishing target habitats and implement remedial measures. This ensures that the habitats created and managed will meet the target condition set out in the oLEMP [EN010141/DR/7.7].

2.4.26 Activity within the Site during the operational phase will be limited, and will principally involve equipment maintenance and servicing, replacement and renewal of any components that fail, monitoring, and vegetation & landscape management. For the latter, this would be in line with the oLEMP [EN010141/DR/7.7]. The maintenance and servicing activity is expected to comprise inspection of equipment, servicing, removal, replacement, and reconstruction or refurbishing of faulty equipment to ensure effective operation of the Scheme.

~~1.7.24~~2.4.27 ~~xxx~~

Commented [PD26]: Does the Applicant want to include a sector on general maintenance of the buildings, access tracks, etc?

2.03.0 ROLES & RESPONSIBILITIES

Commented [PD27]: As suggested within an Introduction report

2.43.1 Site Team

2.4.43.1.1 The following are key **FTE** Site roles during the operational phase that would have responsibility for management of environmental impacts, with responsibilities for each role are also set out (this list is not definitive and additional roles & responsibilities may be added to the final OEMP):

- (1) **Site Manager** – The Scheme Owner/Operator will identify a Site Manager who will have overall responsibility for implementation of the OEMP and all other DCO and legislative requirements.
- (2) **Quality Manager** – The Quality Manager will have responsibility for quality assurance and compliance, document management and record keeping, inspections for quality control, management of risks, and process improvement related to quality control and assurance. For the OEMP they would have responsibility for quality assurance of procedures and for management of documentation, records, and monitoring of the systems relating to the same.
- (3) **Health and Safety Manager** – responsible for the monitoring and control of health and safety, and rules and regulations arising.
- (4) **Environmental Manager** – The Environmental Manager has responsibility for management of environmental matters related to the operational phase of the Scheme, including ensuring compliance with legislation, ensuring that mitigation, management and monitoring measures are implemented, and that best practice is applied during works. The Environmental Manager will be a point of contact with environmental bodies and other third parties as required to perform their duties.
- (5) **Environmental Clerk of Works** – The Environmental Clerk of Works (ECOW) will be a suitably qualified environmental manager responsible for on-site management and monitoring of environmental impacts including for soil management, pollution control, noise and dust monitoring, and surface water.

- (6) **Ecological Clerk of Works** – The Ecological Clerk of Works (EcoCoW) will be a suitably qualified ecologist responsible for on-site managing and monitoring and as required instructing surveys of the works in relation to habitats, protected species, and other wildlife; and, in relations to addressing BNG reporting. The Clerk will also undertake the interface role with the Agrisolar Research Unit (Rothamsted Research).
- (7) **Flood Warden** – The Flood Warden will be responsible for preparation, management, and response to flood incidents, inclusive of reacting to flood warnings and alerts.
- (8) **Community Liaison Officer** – The Operator's Community Liaison Officer will ensure that the Community Liaison Group (CLG) is established and constituted and will act as the point of contact for the CLG, ensuring that regular updates are issued the all parties as

The above roles need to be cross-referenced against §2.4.5 which identified 20No. roles: 12No. roles working on site maintenance; 5No. in management and administrative roles; and, 3No. in land management including landscape maintenance.

identified by the GLG for the during the operational phase of the Scheme.

3.1.2 Within the various Construction and Operational Management Plans the following part time and/ or specialist roles have been identified that may need to be instructed on a regular and/or annual basis to undertake surveys, assess and prepare reports, and make submissions to the relevant local planning authorities; inter alia:

- a) LEMP Steering Group Lead
- b) Travel Plan monitoring
- c) Soil scientist/ Agronomist
- d) Local Nature Recovery strategy preparation

e) Ecological surveys

f) Public Highways and PRow Condition surveys

g) Other

3.1.3 These roles and responsibilities are indicative and will be confirmed in the final OEMP.

2.23.2 Stakeholders

Community Liaison Group

2.2.23.2.1 A CLG will be formed prior to construction (per the oCEMP) and will continue through its operations until ultimate decommissioning of the Scheme.

2.2.23.2.2 During the operational phase, the purpose of the CLG will be to allow interested community members and bodies to be regularly updated on maintenance and other such activities. Regular meetings will be held with the CLG where the Community Liaison Officer will provide updates on upcoming and current work taking place on site, any changes that may occur (e.g. due to unforeseen circumstances), and other useful information (e.g. movement of large loads etc.). The CLG will allow local residents to raise issues with the Community Liaison Officer and to act as a forum to discuss relevant issues for the operation of the Scheme. Membership will be open to the following non-exhaustive groups:

- Parish Councils;
- Local Businesses; and
- Local Community Groups.

Stakeholders

2.2.33.2.3 The following stakeholders (or any successor body) will be engaged during operation of the Scheme where activity is relevant to their area of responsibility:

- Bedford Borough Council;
- Huntingdonshire District Council;
- Cambridgeshire County Council;
- Environment Agency;
- Natural England; ~~and~~
- Historic England;
- Cambridgeshire Fire & Rescue Service
- Bedfordshire Fire & Rescue Service;

3.04.0 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

3.1.14.1.1 This section of the oOEMP sets out the general principles and control measures that will be employed on Site during the operational phase, which are applicable to all aspects of the Scheme.

Operational Hours of Work

3.1.24.1.2 The Scheme would operate 24/7, with the solar farm generating electricity during daylight hours, and the BESS with the potential to operate overnight.

3.1.34.1.3 During the operational phase, **management and** maintenance activities will ~~generally~~ be limited to from 08:00 to 18:00hrs Monday to Friday and from 08:00 to 13:00hrs Saturday, with no work on Sundays, public holidays or bank holidays ~~(-Subject to the Control of Pollution Act (1974)).~~

3.1.44.1.4 There may be occasional instances where operations are required outside the above times e.g. for emergency repairs ~~or for panel cleaning (covered further below).~~

3.1.54.1.5 In such instances, it may be necessary to notify the relevant LPA of the planned modification to the working hours.

Site Security

3.1.64.1.6 The Site will be secured during operation by the security fencing surrounding the site which will remain in-situ throughout the period of operation of the Scheme. All plant and materials will be secured to prevent theft or vandalism. The Site will be monitored through CCTV and other monitoring systems (e.g. weather stations), which will allow monitoring of the site to identify security or other similar issues and reaction to the same.

4.1.7 The Site's perimeter fencing, fencing to PROWs, if stated Permissive paths' fencing, and security fencing ~~and CCTV & monitoring systems~~ will be

Commented [PD28]: To aid reading/ clarity of this MP, it is suggested that like topics are grouped rather than the current random sub-titled actions.

Commented [PD29]: Technical Note states: §2.5.6 notification works...working hours...

§3.7 Noise 'All works would be carried out on weekdays and during daytime working hours (other than in emergencies)'.

LIR Matter 69: the Council notes the Applicant revert comment.

Commented [PD30]: Copy/ etc text intent in Technical Note §2.5.6 regarding notification.

~~regularly~~ inspected as a minimum twice a year, to ensure that they are in a good state of repair and operating properly. Where issues are found they will be ~~swiftly~~ rectified within 30-days to ensure public safety.

4.1.8 CCTV & monitoring systems will be regularly inspected to ensure that they are in a good state of repair and operating properly. Where issues are found they will be swiftly rectified.

3.1.74.1.9

Protection of the Public

3.1.84.1.10 When maintenance, repair, or major replacement campaign works~~activity~~ takes place in addition to the responsibilities set out under Construction (Design and Management) Regulations 2015 (or any subsequent equivalent legislation), the Site Manager will manage ~~be alert to~~ the risk of works being accessed by unauthorised members of the public and will ensure that site security is maintained at a high standard across the Site to ensure that the risk of access by trespassers is minimised.

3.1.94.1.11 A high standard of 'housekeeping' will ~~also~~ be maintained across the site to reduce risks to trespassers in the event that they do gain access to the site. The storage, operations and maintenance building will be fully secured, and all materials, equipment, and plant stored within will be fully secured when not in use, and in particular at the end of each working day.

3.1.10—Where public rights of way (Footpaths and Bridleways) cross the Site or are effected by the ~~interact with~~ operational activity (e.g. vegetation maintenance activity, routine maintenance of PRow, or where they cross access roads) then ~~works activity~~ will be fully suitably managed to protect the public and equestrian users. In this regard refer to the

3.1.114.1.12 An ~~outline~~ **Public Rights of Way Management Plan** [EN010141/DR/7.8] ~~has been prepared and submitted with the application. This document sets out the principles by which PRow would be managed during the construction and operational phases. Post consent, this outline~~

~~plan will be developed into a full plan which must be in substantial accordance with the outline and will require approval by the relevant LPAs.~~

Management of Vegetation and Planting

~~3.1.124.1.13~~ An outline Landscape and Ecological Management Plan (oLEMP) [EN010141/DR/7.7] has been prepared and submitted with the application. This provides a framework for the delivery of the landscape strategy and the successful establishment and management of the landscape works proposed as part of the Scheme through short and long-term measures for the establishment, monitoring, and management of the measures it covers. This ensures that the landscaping, habitat, and measures and the ecological mitigation and enhancement measures that have been integrated into the Scheme as assessed in the ES and committed to will be successfully delivered and established to the full satisfaction of the local planning authority.

~~3.1.134.1.14~~ If the DCO is granted, the oLEMP will be developed into a final Landscape and Ecological Management Plan (LEMP) prior to commencing construction of the relevant phase. The final LEMP will be in substantial accordance with the oLEMP, as secured via a Requirement in Schedule 2 of the draft DCO [EN010141/DR/3.1].

~~3.1.14~~ The LEMP will operate alongside the final OEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.

Commented [PD31]: Intro Report

Management of Agricultural Inputs and Protection of Groundwater

~~3.1.154.1.15~~ Farming and land management activities undertaken during operation (including any agricultural production associated with the Agrisolar Research Area) will be planned and managed to avoid introducing contaminants to groundwater. Land within the Order Limits will generally be managed as grassland and grazing in accordance with the approved LEMP, which avoids the need for routine agricultural chemical inputs.

~~3.1.164.1.16~~ 3.1.164.1.16 Where the use of herbicides is required for targeted weed control, establishment of planting, or research purposes, non-chemical methods will be used in preference and any chemical use will be limited to the minimum practicable quantity. Any herbicide use will follow the approach set out in the oLEMP, including that herbicides will not be used within 10 metres of watercourses, ditches or ponds, and protected landscapes and/or habitats.

~~4.1.17~~ 4.1.17 All herbicides brought onto the Site will be stored securely in sealed containers within the Operations and Maintenance Building~~bunded areas~~. A register will be maintained by the Site Manager of any herbicide storage and use, including the product, quantity, location, date and weather conditions, and this will be made available to the Environment Agency on request.

~~3.1.174.1.18~~ 3.1.174.1.18 Any spill or suspected pollution incident involving ~~agricultural~~ chemicals and/or petro-carbons will be managed and reported in accordance with the Environmental Incident Management and Pollution Prevention Plan ~~referred~~ and in accordance with the requirements of the Environmental Protection Act 1990, the Water Resources Act 1991, and the Environmental Permitting (England and Wales) Regulations 2016 and related legislation.

~~3.1.184.1.19~~ 3.1.184.1.19 Other than limited herbicide use for localised and targeted weed control, no pesticides (including insecticides or fungicides) will be used during the establishment or ongoing management of the Scheme.

Signage

~~3.1.194.1.20~~ 3.1.194.1.20 Within the Site and-at access points off the public highways, signage will be erected no later than at the inception of the construction phase setting out required conduct within the Site's boundaries (e.g. speed limits, warning of possible hazards etc.). Signage will ~~also~~ be erected at any point where an access track and or heavy-duty access track ~~road~~ crosses or meets a PRoW (Footpath and/or Bridleway) or a similar route to advise Site Operatives of the risk of pedestrians or other non-motorised traffic being having access and rights to the Site~~present~~.

~~3.1.204.1.21 Additional~~ Signage will be affixed to site fencing at regular intervals indicating ~~those areas of the Site which are not that the operational parts of the site may not be access~~ accessible toed by the public and setting out the risks of entry. Signage will be inspected at regular intervals, as a minimum.... and maintained or replaced as necessary to ensure visibility, legibility, and continued good working order.

~~3.1.244.1.22~~ Where necessary, and to ensure the safety of the public and site operatives, temporary signage may be erected along the PRow and permissive paths to warn users of planned or ongoing (landscape, habitat and/or pathway) maintenance works.

Inductions

~~3.1.224.1.23~~ All site visitors and new site operatives will be directed in the first instance to ~~Storage~~, Operations and Maintenance Building where they will be required to sign in and undergo a suitable induction as would be required under the Health and Safety at Work etc Act 1974, the Construction (Design and Management) Regulations 2015 (CDM) and Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

Commented [PD32]: How is this managed with multiple access points to the site over 40-years?

~~3.1.234.1.24~~ Inductions will be completed as appropriate for the role and in accordance with best practice approaches prior to commencing work or visiting site. Records of inductions and competencies will be held on site.

~~3.1.244.1.25~~ Risk assessments and methods statements will be produced for all activities and they will be site-specific. Site Operatives will be briefed by whom? on method statements and risk assessments relevant to their work prior to commencing work. Copies of the risk assessments and method statements will be held on site and will be available for use and inspection.

4.1.26 Site Operatives and visitors will be required to sign in and out every day.

~~3.1.254.1.27~~ There is no responsible person attributed to these actions.

Deliveries & Collection

3.1.264.1.28 Parking will be provided for staff and visitors at the operations and maintenance area, and this area will be retained for use for these purposes throughout the operation of the **Scheme**.

Commented [PD33]: Note ONLY 7 bays indicated. Concern expressed elsewhere

3.1.274.1.29 Deliveries and collections of material **to and** from the site will be from the operations and maintenance area except **where** the nature of maintenance/repair activity requires that materials are best delivered to or collected from the area of work. Drivers will be required to report to the **storage**, operations and maintenance building during working hours. When the site is not open for deliveries & collections, delivery/collection vehicles will not be permitted to circulate, queue, or wait on the public highway.

Commented [PD34]: Refer to commitments regarding deliveries set out in Technical Note [REP1-066]

Health & Safety

3.1.284.1.30 The requirement for comprehensive health and safety assessments is an essential part of any business activity. A Health & Safety Plan will be produced as part of the **OEMP**.

Commented [PD35]: By whom, signed-off by whom, etc

3.1.294.1.31 Regular meetings, **no less than....** will be held between the Site Owner/Operator, Site Manager, and Health and Safety Manager to review matters related to health & safety. The Health and Safety Manager will ensure that they or a suitably, **delegated** qualified member of their **organisation** regularly visits the site to monitor health & safety matters. Monitoring reports will be produced and provided after these **visits**.

Commented [PD36]: So this is not a FTE job but contracted out?

Commented [PD37]: Submitted to whom, who actions, etc

3.1.304.1.32 Reportable accidents and dangerous occurrences will be reported in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (as amended) (RIDDOR), or any successor legislation in force at the time of operation of the Scheme.

3.1.314.1.33 In line with other requirements in this section, appropriately licenced contractors will be appointed to undertake work, a safe system of working established prior to commencement of works, and Personal Protective

Equipment (PPE)/Respiratory Protective Equipment (RPE) suitable for the tasks must be worn by operatives.

Contamination and Pollution

~~3.1.324.1.34~~ 3.1.34.1.34 Should a pollution incident occur, detailed records of the incident will be made and the relevant ~~statutory~~~~external~~ organisations, ~~not limited to~~ would be promptly contacted ~~by whom?~~ in accordance with an agreed Environmental Incident Management and Pollution Prevention Plan as part of, or accompanying the final OEMP.

~~3.1.334.1.35~~ 3.1.34.1.35 All accidents, incidents and near misses (including spills, dust, noise pollution etc.) ~~can be reported by any Site Operative will be reported to the~~ Site Manager immediately. These will be recorded and investigated as appropriate ~~by whom?~~. Details to be recorded will include: a description of the incident, potential contributory causes, adverse effects ~~(including landscape, habitate, environmental and/or PRow)~~, measures implemented to mitigate adverse effects, ~~programme of actions, monitoring to conclude,~~ and effectiveness of measures implemented to prevent incidents happening again.

Welfare Provision

~~3.1.344.1.36~~ 3.1.34.1.36 The ~~storage,~~ operations and maintenance building will include welfare facilities ~~(as a minimum kitchen, changing, and loo facilities)~~ and is expected to meet the needs of operatives present on site for the majority of activities. Where maintenance, repair, or other such work is taking place at a distance from the ~~storage,~~ operations and maintenance building it may be necessary to provide temporary, ~~removable~~ facilities for welfare. If so, these will be fit for purpose, and at minimum will include toilet facilities and welfare facilities that store foul/wastewater. These will then be collected/emptied by specialist licenced ~~contractors~~.

Commented [PD38]: As per oCEMP §4.1.29

Commented [PD39]: Reading this against the Technical Notes, these could be around for between 9months upto 7 years. In principle it was understood that there would be only one central such facility, as assessed.

Lighting

3.1.354.1.37 During the operational phase -no part of the Scheme will be continuously lit as this will not be required for its operation.

3.1.364.1.38 The East Park Substation will require artificial lighting in order to provide security and ensure the health and safety of those working on the site. However, this will be designed and sited to minimise impacts on human and ecological receptors, and would generally only be required at night or during low light levels. The lighting will be manually operated and will not be on when staff are not working in the substation. Planned maintenance of the substation will take place in daytime hours, thus limiting the need to use lighting for unplanned maintenance or to address site-specific safety or security matters.

3.1.374.1.39 In other parts of the Site, temporary mobile lighting may be required during maintenance activities during winter months, or during periods where unexpected work must occur. This is not expected to be a regular occurrence. Lighting will be operated to minimise impacts on human and ecological receptors, and would generally not be operated outside of the specified working hours. Lighting will utilise directional fittings to minimise outward light spill and glare.

3.1.384.1.40 As set out in Section 2.4 of this oOEMP, the solar PV panels will be cleaned at night using a tractor-mounted system. The tractor will utilise headlights and a spotlight whilst driving up and down each row, which is similar to that used during night-time arable harvest operations that currently take place across the east of the site.

Utilities

3.1.394.1.41 Due to the nature of the Scheme, it is not anticipated there would be any works that could affect below ground utility infrastructure during the operational phase. However, should maintenance works require excavations, measures in relation to safe working near buried utilities will be in place and detailed in the final OEMP.

Commented [PD40]: Why does this not follow the spirit of oCEMP §4.1.30-35?

In light that this may now need to cover the replacement campaign, refer to Table 5.1 and 5.2 oCEMP; and Section 5.2 oLEMP.

Commented [PD41]: This conflicts with the stated 'Working Hours' and Table 5.6 'Operational maintenance will take place only during daytime hours, except in emergencies'.

This activity is NOT assessed in [APP-046] Chp 10 Noise and Vibration and consequently has not been assessed and/or mitigated by the Applicant.

Commented [PD42]: Bare-bone strategy required in Outline.

4.1.42 Cable replacement during replacement campaign...

~~3.1.404.1.43~~ The draft DCO [EN010141/APP/3.1] includes protective provisions for the protection of existing utilities.

Emergencies, Fire Plan, and Special Site Instructions

~~3.1.414.1.44~~ An eEmergency flood planning Response Plan will be developed by the Operator and submitted to their consultation with the relevant local lead flood authority emergency planning officer for written approval prior to the start of the construction phase and reviewed prior to the operational phase. The operator will undertake consultation with the statutory emergency services including the local fire and rescue service, as well as the Environment Agency in relation to responding to flood warnings and events.

~~4.1.45~~ An Emergency Response Plan will detail the procedures for responding to incidents and emergencies on site, and any reporting arising from them.

~~4.1.46~~ The Emergency Response Plan will detail the procedures for responding to incidents and emergencies on site, and any reporting. The Emergency Response Plan will be shared by the Operator with the appropriate statutory emergency services prior to the start of the operational phase, and any subsequent revisions to the plan should be shared promptly with emergency services.

Commented [PD43]: As taken from the oCEMP

~~4.1.47~~ The Plan will be reviewed annually.

~~3.1.42~~

~~3.1.434.1.48~~ A notice displaying the Operators and statutory services' emergency contact details will be displayed as a minimum in a prominent location onsite — such as within the storage, Operations and Maintenance building. External notices providing emergency contact details will be placed at prominent locations around the perimeter of the Site.

~~3.1.444.1.49~~ At site induction all personnel that have access to the Site must be advised by the Site Manager of the firefighting, medical, and chemical

containment equipment on Ssite and related the escape routes and
procedures.

Certification of Mobile and fixed Plant

4.1.50 All plant will have the statutory, required appropriate certification and
maintenance record checks with copies held by the Site Manger on file on site
at the Operations and Maintenance building.

3.1.454.1.51 All plant will be regularly inspected as statutorily required and certified
for compliance, with inspections occurring as a minimum annually, and
records of these inspections will be held by the Site Manger on file on site at
the Operations and Maintenance building on file on site.

Waste management

3.1.46 ~~The waste hierarchy must be applied by any person who produces, keeps or
manages waste per the duty set out in the Waste (England and Wales)
Regulations 2014. A Waste Management Strategy, prepared by the Operator
in accordance with the Waste (England and Wales) Regulations 2011, will be
prepared, managed, and monitored by the Operator and Site Manager for the
duration of the operational phase including general maintenance works and
the major replacement campaigns. The waste hierarchy requires any person
managing waste to first consider waste prevention, then preparing material
for re-use or recycling, and only then use waste recovery methods (i.e. firstly
energy recovery), and then waste disposal as the last option. Thus, the waste
hierarchy must be applied when managing the operational phase of the
Scheme.~~

4.1.52

**Detail of measures to minimise, re-use, and control waste
are set out in the outline Waste Management Plan [APP-164]
~~later in this document~~ and will be detailed in the final
WMP~~OEMP~~ prior to the date of final commissioning ~~for any~~**

~~phase of the~~ **construction phase and reviewed prior to the start of the operational phase authorised development.**
~~However, briefly, these will as a minimum include:~~

4.1.53

- ~~• Take all reasonable steps to minimise the volume of waste generated by the operational phase of the Scheme (e.g. reduce and re-use);~~
- ~~• Separate main waste streams on the site and segregate them to maximise opportunities of re-use and recycling; and,~~
- ~~• Where waste is to be removed from the site to a waste facility then fully licenced waste carriers will be used and waste will be taken to licenced facilities.~~

Surface water management

~~3.1.474.1.54~~ **An outline Surface Water Management Plan (oSWMP) [EN010141/DR/7.13]** has been submitted with the application, which sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. It ~~also~~ details measures for management of fire water run off in the event of a fire at the BESS. If the DCO is granted, the oSWMP will be developed into a final Surface Water Management Plan (SWMP) once a contractor is appointed. The SWMP will be in substantial accordance with the oSWMP, as secured by a Requirement of the draft DCO **[EN010141/DR/3.1]**, for submission and approval by the relevant LPAs prior to commencement of construction.

~~3.1.484.1.55~~ The final SWMP sets out the proposed management measures for surface water quality and management of surface water (including the rate and volume of surface water run off during operation). It will apply the same principles and approach set out in the oSWMP.

Commented [PD44]: Same comment: just refer to the appropriate MP; duplication leads to lack of clarity of this plan.

~~3.1.494.1.56~~ The SWMP will operate alongside the final OEMP, with both ensuring the proper management and maintenance of their respective aspects of the Scheme.

Flood risk

~~3.1.504.1.57~~ Limited sections of the Site are subject to fluvial flood risk, with critical infrastructure placed outside of those areas. However, there is some risk of pluvial flooding in parts of the site from surface water and smaller watercourses. The Scheme has been designed to account for those risks as set out in **ES Vol 1 Chapter 8 Hydrology and Flood Risk [EN010141/DR/6.1]** and the Flood Risk Assessment at **ES Vol 2 Appendix 8-1: Flood Risk Assessment [EN010141/DR/6.2]**.

Commented [PD45]: Broadly where?

~~3.1.514.1.58~~ To manage the residual risk of flooding to site operatives a Flood Warning and Evacuation Plan will be developed by?? When?? and a FTE Flood Warden will be appointed by the Operator, who will be familiar with the Site, and will ensure that operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event. The Flood Warden will liaise with the Environment Agency to receive appropriate flood warnings in advance of any potential flood event.

Commented [PD46]: A bare-bone structure of this Plan is required.

Liaison with Public

~~3.1.524.1.59~~ Neighbouring residents will be ~~actively~~ informed about any substantial maintenance, repair, or major replacement campaign work on the Site throughout the duration of the operational phase ~~of the Scheme~~ via the Community Liason Group~~LG~~. Regular communications will be sent to them to provide updates on such work, any changes that may occur (e.g. due unforeseen circumstances), and other useful information (e.g. movement of large loads etc.). These will also include details of a contact telephone number and the project website.

Commented [PD47]: Paragraph all too vague

~~3.1.534.1.60~~ A contact telephone number will be maintained by the Operator and Site Manager throughout the operational phase of the Scheme (including an outside of working hours [out of hours] number for use if required) to allow

members of the public, local businesses, and other such parties to make enquiries or raise a complaint. The telephone number provided to local residents and businesses will be maintained at all times during the operational phase in order to respond to any enquiries and complaints.

3.1.544.1.61 A project website will be maintained throughout the operational ~~phase of the Scheme~~ to allow members of the public, local businesses, and other such parties to view updates on the Scheme, make enquiries or raise a complaint. The project website will be maintained at all times whilst the Scheme is in operation in order to respond to any enquiries and complaints.

3.1.554.1.62 Any ~~enquiries and~~ complaints arising ~~from the site~~ during the operational phase will be addressed by the Site Manager. A Complaints Register will be maintained, and this will include the following:

- Complainant's details.
- Date and time of the complaint.
- Cause(s) of the complaint.
- Record of a Action taken to resolve the complaint, contact the person raising the matter, and date and time of the same, or reasons for any unresolved complaints (including where no issue is found).

3.1.564.1.63 The Complaints Register will be regularly reviewed as part of monitoring of the final OEMP to ensure that it is being followed, that any issues are identified, and to monitor compliance with its Management and Mitigation Measures.

Best practice measures

4.1.64 The Operator will as a minimum ensure total compliance with the Construction (Design and Management) Regulations 2015 (CDM) and Building Regulations as applicable.

4.1.65 The Operator will register to the voluntary Considerate Constructors Scheme (CCS)⁴, or equivalent, for the operational and decommissioning phases at the time of operational phase of the Scheme. Within the Scheme, projects are assessed against key areas, namely:

- a) Respecting the Community: minimizing disruption, managing noise/dust, and engaging with neighbours;
- b) Caring for the Environment: reducing carbon footprints, preventing pollution, and managing waste responsibly; and,
- c) Valuing the Workforce: ensuring a safe, inclusive, and supportive work environment, which includes promoting mental health and fair pay.
- d) ESG Compliance: the Scheme provides a structured framework that helps Operators meet modern environmental, social, and governance (ESG) requirements.

4.1.66 , will be adopted for the Scheme for relevant repair or replacement activity. This standard includes best practice measures that go beyond statutory compliance and thus will further reduce pollution and nuisance from the Scheme.

Commented [PD48]: This is a statement with no attributed action by/of the Operator.

4.1.67 The Operator will ensure that all site operatives hold the correct certifications, accreditations as required, and undergo site inductions. Records of such will be kept by the Site Manager.

4.1.68 Due to the duration of the operational phase, the Operator will continually monitor, adopt, and evidence application of Best Practise as it emerges.

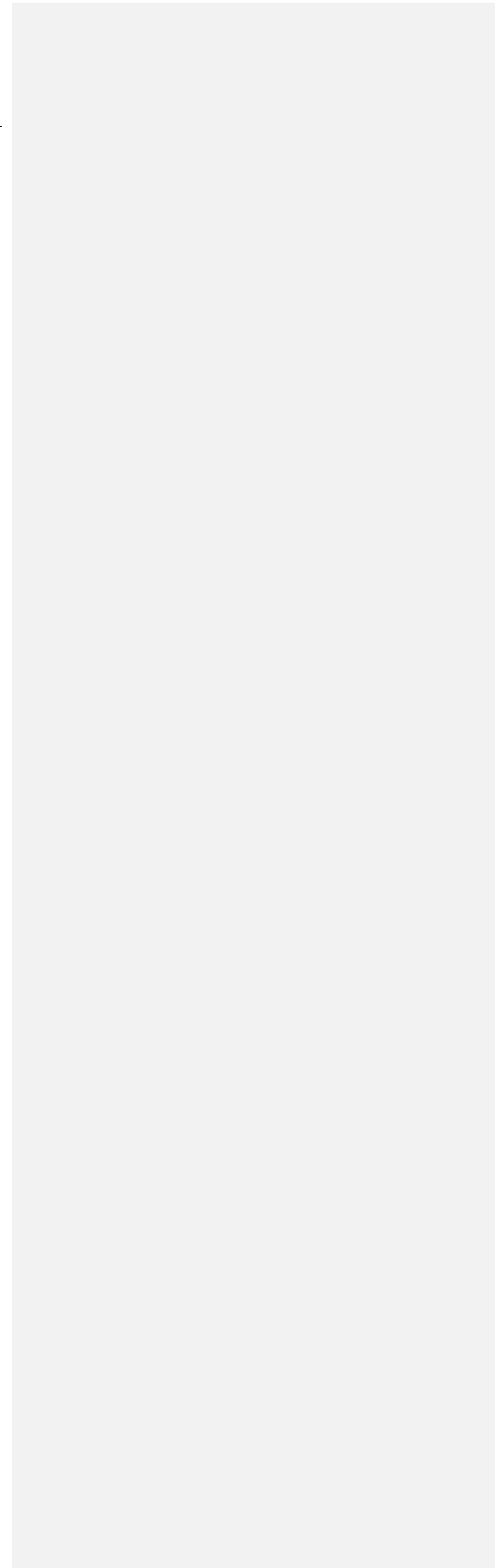
4.1.69 Due to the duration of the operational phase, the Operator will continually monitor, adopt, and evidence legislation and guidance that references of Best Practise as it emerges.

⁴ Ref <https://www.considerateconstructors.com/>

3.1.574.1.70

Monitoring & Implementation Arrangements

3.1.584.1.71 The Site Manager will be responsible for the day-to-day management of the site and will ensure that all restrictions / provisions ~~noted in the final OEMP are undertaken. Detail of general monitoring requirements are as~~ set out in the Tables below are undertaken..later in this document.



4.05.0 ENVIRONMENTAL MANAGEMENT PLAN MITIGATION MEASURES

4.1.15.1.1 The following tables set out the outline Operational Environmental Management Plan measures mitigation and management measures that would, as a minimum, form part of the final OEMP. These have been prepared/ informed by using the assessment of aspects within the ES; the Applicant's proposed mitigation, enhancement, and maintenance measures; and, in response to matters as submitted by third-parties details set out in the ES of required measures for each topic. These measures would be secured in the final OEMP, which would be prepared by the Site Operator (or a suitable person nominated by them) prior to the inception of the construction phase and reviewed and submitted for written approval to the local planning authority prior to the inception of the operational phase. These submissions and approvals will be date of final commissioning for any phase of the authorised development, which is secured by as a Requirement xx of the DCO Agreement.-

Table 5.1:- Summary of the operational mitigation and management measures— Landscape and visual

Potential Impact as identified being managed / mitigated	Mitigation and/or management Mmeasure as identified to be implemented	Requirement of the Operator for monitoring and reporting
Potential loss of vegetation due to maintenance activities	The outline Landscape and Ecology Management Plan (oLEMP) [EN010153/DR/7.7] establishes measures to protect and maintain existing vegetation, ensuring that retained vegetation is safeguarded throughout the operational phase.	Regular Seasonal site visit monitoring and reporting and annual surveys to assess landscape and habitat/vegetation health and compliance with the ES objectives set out within the oLEMP.
	Any vegetation losses or failure of plants to establish will be replaced in line with the oLEMP and the requirements of the DCO.	

Commented [PD49]: The Applicant has committed to both mitigation AND enhancement measures which should be addressed. These measures should reflect the circa three commitments; namely:

1. Assessment of aspects within the ES;
2. The Applicant's proposed mitigation, enhancement, and maintenance measures; and,
3. In response to matters as submitted by third-parties (say revert on Local Impact Reports).

Commented [PD50]: This needs to be SMART.

In general these Tables are vague and do not give exact commitments, actions, programme of works, and address of failure to attain objectives.

These tables also need to set out works relating to the replacement campaign if this is to be part of this phase. Currently these tables are silent.

The Council noted that the landscape screening would be established with a certain year period - how does this Plan reflect if in monitoring it is realised by the Operator that they will NOT attain such screening - what default strategy then kicks in?

At ISH3 the question of using local, mature planting was raised to mitigate against poor/ late screening - the Applicant's strategy in this regard needs to be set out clearly.

The Council is concerned that again there could be conflict, lack of clarity, missed matters between the various Management Plans.

Potential Impact as identified being managed / mitigated	Mitigation and/or management measure as identified to be implemented	Requirement of the Operator for monitoring and reporting
	Routine vegetation management, including hedgerow and tree maintenance, will be conducted to preserve screening effectiveness.	Records will be kept of any vegetation loss and replanting efforts.
Visual impact of the development from surrounding areas	In accordance with the oLEMP: - Existing landscape features such as hedgerows and woodland belts <u>as identified</u> will be retained and enhanced <u>(how?)</u> to provide natural screening. - New planting of trees and hedgerows will be carried out where additional screening is <u>required</u>. - Maintenance of screening vegetation to ensure continued effectiveness.	Visual inspections from key viewpoints to confirm the effectiveness of screening. Adaptive planting strategies to reinforce screening where necessary.
Glint and glare from solar panels	<u>All solar PV panels will be fitted with anti-reflective coatings (ARC), which is the industry standard for solar PV panels, which reduces the reflective properties of solar PV panels to reduce glint and glare.</u> <u>No less than 20-25cm girth Semi-Mature tree planting Mature planting and 5-10litre container mature and large shrub (as defined by BS3936), or 4 mesh fencing were identified, will be used to mitigate residual glare effects.</u>	Review of any complaints related to glare and adjustments made if necessary.
Impact of temporary site lighting during maintenance activities or periodic replacements	Lighting will be designed to minimise light spill, using directional fittings and low-intensity lamps where possible. Mobile lighting will only be used when essential for safety and will be turned off when not required. Maintenance activities requiring lighting will be scheduled during daylight hours where feasible. CCTV will use infra-red technology to minimise potential impacts from lighting.	Monitoring of temporary lighting use to ensure compliance with best practices.

Commented [PD51]: How is this assessed, recorded, consultation with LPA?

Potential Impact as identified being managed / mitigated	Mitigation and/or management Measure as identified to be implemented	Requirement of the Operator for monitoring and reporting
Effects on users of Public Rights of Way during operational maintenance, including for periodic replacements	An outline Public Right of Way Management Plan [EN010153/DR/7.8] has been prepared and will be developed into a final Public Right of Way Management Plan prior to the start of construction in accordance with a Requirement of the draft DCO [EN010153/DR/3.1]. The measures agreed in the final Public Right of Way Management Plan will be implemented if required during the operational phase as part of any periodic replacement.	Regular inspections of PRow routes within the site. Monitoring of public feedback regarding accessibility and signage quality.
	Signage and interpretation boards will be installed to provide information about the site and its renewable energy function.	

Table 5.2: Summary of the operational mitigation and management measures – Cultural Heritage

Commented [PD52]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon setting of heritage assets set outside of the site	The oLEMP [EN010141/DR/7.7] sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, inclusive of the setting of heritage assets outside of the site. Those measures will be followed thus ensuring that is protected during the operational phase of the Scheme, and that new planting is provided and maintained where required throughout the operational phase. Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oOEMP.	Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency. Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.
Impact upon Scheduled Monuments	Aside from landscape maintenance works, or works in accordance with a written scheme of investigation agreed with Historic England, there will be no works within the Roman small town south of Great Staughton scheduled monument.	
Impact upon setting of heritage assets set outside of the site	Best practice measures will be implemented to control noise, light, vibration, and vehicle movements in accordance with this oOEMP.	

Table 5.3: Summary of the operational mitigation and management measures – Ecology

Commented [PD53]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Potential habitat loss or disturbance to wildlife through management and maintenance activities on site. Indirect and direct impacts to on-site habitats.	Any works with the potential to disturb wildlife, such as vegetation clearance, will be scheduled outside of sensitive periods (e.g., bird nesting season). If this is not possible, pre-work surveys will be conducted by the EcoCoW or other suitably qualified ecologist. The oLEMP [EN010141/DR/7.7] sets out measures for the delivery of the landscape strategy, which would also ensure that the ecological mitigation and enhancement (biodiversity net gain) measures that have been integrated into the Scheme are successfully delivered. The final LEMP that will be produced following the grant of a DCO will include measures to ensure that impacts from management activities are minimised and harm to fauna is avoided. Those measures will be followed during the operational phase of the Scheme. Lighting to be used only where required, and if used to be task specific and directed away from boundary habitats including woodland, hedgerows and watercourses. Best practice measures will be implemented to control dust, noise, light, vibration, and vehicle movements in accordance with this oOEMP.	An EcoCoW will be appointed for the operational phase who will review and monitor all works on Site. Appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency. Records to be kept of habitat maintenance and remedial actions taken, in accordance with the requirements of the LEMP. Monitoring of measures to control noise, light, vibration, and vehicle movements will be per detail set out elsewhere within the oOEMP.
	Task-specific lighting will be used to avoid light spill into sensitive habitats (e.g., woodland, hedgerows, and watercourses).	
	Best practice measures will be implemented to control dust, run-off, noise, light, vibration, and vehicle movements throughout the operational phase (including for any periodic replacements), as set out in the air quality, noise, and traffic tables of this oOEMP.	
Disturbance to protected and notable species through management and maintenance	Prior to any significant replacements, ecological surveys will be carried out for protected species, such as otters, water vole, badgers, roosting bats, great crested newts, and breeding birds. Should any of these protected species be identified, appropriate mitigation measures will be implemented in accordance	Species monitoring as detailed in the LEMP, including reporting on population trends of key species.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
activities or periodic replacements	with relevant legislation and best practice guidelines to ensure their protection throughout operational activities and included in the notification referred to in Section 2.0 of this oOEMP.	
	The final OEMP will provide details of the mammal gaps to be incorporated into perimeter fencing to maintain habitat connectivity, as per the oLEMP.	
Spread of Invasive Non-Native Species (INNS) through management and maintenance activities or periodic replacements	An Invasive Non-Native Species (INNS) Management Plan will be developed to control and, where possible, eradicate INNS. Training will be provided to site staff to ensure compliance with biosecurity measures, including cleaning equipment before and after use in affected areas. Any soils containing INNS will be managed in line with regulatory requirements and disposed of appropriately.	Effectiveness of control measures will be reviewed, and adjustments made if necessary.

Table 5.4: Summary of the operational mitigation and management measures – Hydrology and Flood Risk

Commented [PD54]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon water quality from run-off from permanent hardstandings and structures. Impact of surface water flows upon watercourses from new hardstandings. and flows from the same	An oSWMP [EN010141/DR/7.13] has been submitted with the application and sets out measures for the site wide management of surface water, rainfall run off, ground water, and site drainage. If the DCO is granted, the oSWMP will be developed into a final Surface Water Management Plan (SWMP) once a contractor is appointed. This will include measures for the proposed management measures for surface water quality, and management of surface water (including the rate and volume of surface water run off) during operation. The surface water management measures must then be maintained and operated per the SWMP.	Drainage features will be regularly monitored to ensure that they are operating effectively. Specific details of this monitoring will be confirmed in the detailed SWMP. Requirements for a detailed watercourse quality monitoring plan will be agreed with the regulator. This would include details of all baseline, construction phase and post construction (operational phase) monitoring, which will involve both visual assessments and quality testing.
Chemical and fuel spillages resulting in pollution of watercourses and/or ground water	Equipment and spill kits will be provided to contain and clean up any spills to minimise the risk of pollutants entering watercourses. Where fuel, oil or solvents are stored temporarily on Site, these containers will all be stored within bunded areas and covered. Additional precautions would be taken during plant operation in any areas where there is storage of fuels or chemicals. An Environmental Incident Management and Pollution Prevention Plan will be produced prior to the date of final commissioning for any phase of the authorised development commencing and will be reviewed and updated regularly by the Site Manager. Training will be provided to site workers as part of induction processes and will be updated as necessary. This plan will contain information relating to the location of spill kits and any sensitive receptors, as well as the procedure for incident response. In the unlikely event of any incident, the Site Manager will be notified and will work to coordinate remedial actions.	ERP to include measures in respect of containing and then treating fire water in the event of a fire at the BESS. Should an event occur then effectiveness of measures will be monitored and reported upon.
Uncontrolled release of fire water in the event of a fire	Measures to contain and control any potentially contaminated firewater run-off in the event of a fire at the BESS are set out in the outline Battery Safety Management Plan (oBSMP) [EN010153/DR/7.8] which will be developed into a	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	final BSMP prior to construction, as secured by a Requirement of the draft DCO [EN010153/DR/3.1]. The Emergency Response Plan (ERP) will include steps to ensure that fire water is contained within the site in the event of a fire, and then for its subsequent treatment.	
Foul Drainage	There will be no unapproved discharge of foul drainage from the Site either to groundwater or any surface waters, whether direct or via a soakaway. The sewage system for the storage, operations and maintenance building will be maintained and managed as required. Where temporary welfare facilities are in place sewage and foul water will be collected in appropriate collection tanks. Regular collection and disposal of sewage and foul water will be conducted by a licenced company.	
Risk of flooding to Site Operatives	A Flood Warden will be appointed, who will be familiar with the Site and the risk of flooding in the area, and will ensure that operatives are alerted when there is a risk of flooding and that work in impacted areas is rescheduled or stopped in advance of any such event.	Monitoring of flood events by the Flood Warden and recording of responses to these and the effectiveness of measures taken.

Table 5.5: Summary of the operational mitigation and management measures – Traffic and Transport

Commented [PD55]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Movement of vehicles for operational maintenance activities and periodic replacements.	The operational phase of the Scheme would generate a low level of trips (staff vehicles, a small number of delivery and service vehicle trips, and occasional access by HGVs during replacement of items such as transformers, etc.). for general maintenance activities and for any periodic replacements. Therefore, there is not expected to be any significant effect on the highway and so no specific mitigation measures are proposed. The Site accesses, access tracks, and parking area at the storage, operations and maintenance building will be maintained throughout the operational phase of the Scheme.	The Site Manager will undertake such monitoring as is necessary. Further details to be confirmed in the OEMP.
	Prior to any planned replacement of a centralised inverter or solar transformer within Site A, Site B or Site C, the Site Operator must notify the relevant local highway authority or authorities not less than 28 days in advance. The notification must include the proposed replacement programme, the proposed route from Site D to the relevant work area, and any traffic management measures proposed to be implemented as part of the delivery and replacement works.	
	Where operational LGV or HGV movements including those associated with maintenance, repair or replacement activities, are required to route along Causeway Road past Great Staughton Primary School, such movements will be scheduled to avoid highway network peak hours and school drop-off and pick-up periods on school days. The relevant school drop-off and pick-up periods will be confirmed in the final OEMP, having regard to the operating hours of Great Staughton Primary School and any relevant advice from the local highway authority.	

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact upon users of PRow within the Site.	An outline Public Right of Way Management Plan [EN010141/DR/7.8] has been prepared and will be developed into a final Public Right of Way Management Plan prior to the start of construction in accordance with a Requirement of the draft DCO [EN010141/DR/3.1] . This will set out measures to maintain the safety of PRow users during the operational phase of the Scheme.	The appointed contractor will undertake such monitoring as is necessary. Further details to be confirmed in the OEMP and in a Public Right of Way Management Plan.

Table 5.6: Summary of the operational mitigation and management measures – Noise and Vibration

Commented [PD56]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of noise arising from operation at noise sensitive receptors (NSR).	Equipment will be regularly inspected and checked for signs of disrepair or other problems that are creating an increase in volume or a change in tonality. Where complaints are received, these will be investigated, where required by a suitably qualified practitioner working to the latest version of BS 4142 (or any subsequent equivalent standard), to identify the source of any issue. Where an issue is found action will be taken to resolve it within a reasonable timeframe. Prior to the date of final commissioning for any phase of the authorised development, an Operational Noise Assessment will be submitted to the relevant LPA, demonstrating how the Scheme design incorporates mitigation to ensure compliance with the operational noise rating levels set out in Paragraph 10.7.6 of ES Volume 1, Chapter 10: Noise and Vibration [EN010141/DR/6.1]. The design as described in the operational noise assessment must be implemented as approved and maintained throughout the operation of the Scheme.	The OEMP will include details of the required performance levels of the operational plant with respect to noise, and the required recording of inspections of the same. The Environmental Manager will record any complaints in the relevant system, and record the result of any complaint.
Impact of noise arising from maintenance and repair activities at noise sensitive receptors (NSR).	Best practical measures will be employed in accordance with BS5228-1:2009+A1:2014 (or any subsequent equivalent standard) to control noise generation (e.g. using equipment that is regularly maintained, where practicable use equipment fitted with silencers or acoustic hoods). Operational maintenance will take place only during daytime hours, except in emergencies. Routing of plant and vehicles will be optimised to minimise noise at sensitive locations. Acoustic hoods and silencers will be fitted to noisy plant where required. Non-tonal 'broadband noise' reversing alarms will be used instead of tonal beepers. Local residents will be informed in advance of any planned noisy maintenance works.	Appropriate survey/s undertaken to show compliance with noise threshold guidance, and compliance with measures regularly recorded via an appropriate method to be determined in the OEMP. The OEMP will detail the frequency.

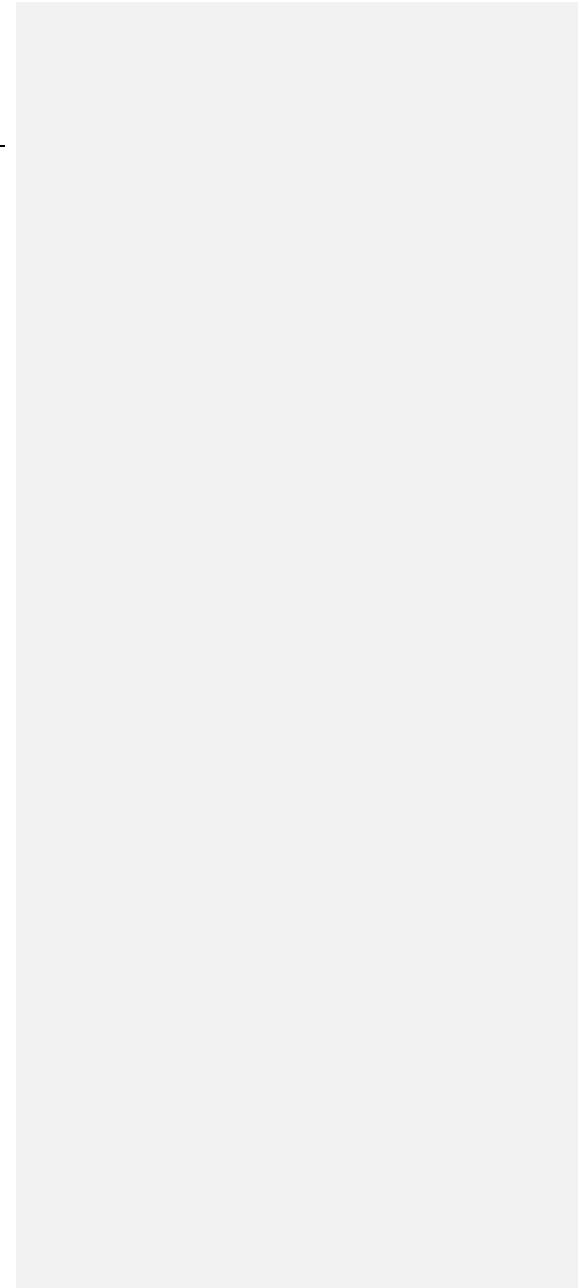


Table 5.7: Summary of the operational mitigation and management measures – Air Quality

Commented [PD57]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impact of dust arising from activities on the site, and movement of vehicles within and outside the site	Best practice measures will be set out in the OEMP to control and manage dust emissions. Measures to be derived from the Institute of Air Quality Management (IAQM) guidance. Measures would include:- • Use of suitable dust suppression measures or techniques when using cutting, grinding, or sawing equipment. • Suppression of dust/particulate matter using non-potable water where possible and appropriate. • Dry spillages to be cleaned as soon as possible after the event using suitable equipment and wet cleaning methods. • Fully enclosing the site of operations where there is a high potential for dust production and there is a high potential of impacting upon receptors for an extended period. • Ensure the proper maintenance of access roads, clean the highway or access roads where material is tracked onto them. • Provision and enforcement of internal site speed limit of 20mph along internal access tracks. • Ensuring that any material being carried in vehicles is properly secured and contained. • Inspection of vehicles before using public highway and removal of dust/soil where required. • Where earthworks are required, then their extent is to be minimised to reduce exposed areas, and completed earthworks and other exposed areas are to be covered with topsoil and re-vegetated as soon as practical to stabilise surfaces.	Compliance with measures to be regularly recorded via an appropriate method to be set out in the OEMP. Site inspections and road monitoring to be undertaken as required.

Table 5.8: Summary of the operational mitigation and management measures – Ground conditions

Commented [PD58]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Encountering unexpected contamination during operation	An Unexpected Contamination Protocol will be developed. The protocol will include site-specific guidance on identifying and managing previously unidentified contamination, detailing required actions, risk assessments, and necessary engagement with regulatory bodies. Any unexpected contamination will be logged, and remedial actions taken in accordance with best practice guidelines.	Compliance monitoring with the Unexpected Contamination Protocol.
Generation of contaminated run-off	Implementation of Environmental Incident Management and Pollution Prevention Plan to be developed to include, amongst other information, contact with appropriate regulatory authorities. Maintenance of existing drainage and SuDS features to ensure proper containment and filtration of run-off. Routine training for site operatives on pollution prevention and emergency response procedures.	Monitoring and sampling as detailed within Environmental Incident Management and Pollution Prevention Plan to be included as part as OEMP.
Leaks and spillages of fuel, chemicals, or hazardous materials	The storage of fuels or chemicals and cleaning agents required during the operational phase will be limited to cleaning agents, fuel for equipment, fuel for diesel generators, and above ground diesel and ad-blue tanks / fuel tankers for re-fuelling Site plant. Fuel storage would be housed appropriately and bunded, refuelling would be limited to designated re-fuelling areas away from sensitive receptors. Cleaning agents and other hazardous materials will be stored in a suitable bunded location on site, and will be returned to this location in properly sealed containers at the end of each working day. A suitably stocked spill-kit will be retained within the Site, and an Environmental Incident Management and Pollution Prevention Plan will be prepared setting out	Routine inspections of fuel and chemical storage areas. Incident reporting and follow-up actions for any spills.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	procedures to respond to a spillage, and for reporting if required to the Environment Agency. Equipment to be regularly inspected to ensure that damage or leaks are identified early and repairs are made or equipment is replaced.	
Soil erosion or ground instability	Soil management measures in line with the principles of the approved Soil Management Plan for construction will be set out in the OEMP. The surface water drainage strategy will ensure drainage measures prevent erosion and protect soil structure.	Periodic inspections of ground stability and erosion-prone areas. Geotechnical assessment if works are required near bund structures.
Contamination of groundwater	The Site Manager shall, wherever reasonably practicable, ensure that fuels, oils and other chemicals used during operation, including cleaning agents, decontaminants and similar products, are free from intentionally added PFAS. Where PFAS-free alternatives are not reasonably practicable, products shall be selected, stored, handled and used so as to minimise the risk of contamination to soil, groundwater and surface water.	Regular audits to assess compliance.

Table 5.9: Summary of the operational mitigation and management measures – Land and Soils

Commented [PD59]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts to soils	Implementation of the measures set out in the outline Soil Management Plan [EN010141/DR/7.9] which will be developed into a final Soil Management Plan in accordance with a Requirement of the draft DCO [EN010141/DR/3.1]. Should there be a need for soil disturbance during maintenance activities, this would be managed in accordance with the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and the Ministry of Agriculture Fisheries and Food (MAFF's) Good Practice Guide for Handling Soils and include the following: - Careful control of movement of plant and vehicles around the Site, including use of low-pressure tyres to distribute weight where possible. - Management of soil horizons to ensure that topsoils and subsoils are kept separate when excavated, not mixed with other materials, and replaced in a sensitive manner to restore pre-excavation soil horizons and avoid excessive compaction. - Avoiding multiple handling of soils, which should be moved directly from areas being excavated or stripped to receptor sites, stockpiles, or reinstatement. - Ensuring soils are only handled in appropriate moisture conditions. Recording of soil handling operations and regular monitoring of soil condition across the Site in accordance with the SMP.	Soil handling operations will be recorded and regular monitoring of soil conditions, including compliance with the CEMP, across the Site.
Impacts to soils through compaction, and loss or degradation	Movement of maintenance vehicles around the Site to generally be on access tracks, with movement off these only when soils are dryer and less susceptible to compaction and waterlogging and vehicles to use low-pressure tyres to distribute weight where possible.	Soil assessments and monitoring will take place as detailed in the SMP (to be appended to the OEMP prior to the date of final commissioning for any phase of the authorised development commencing). The Environmental Manager will be

Commented [PD60]: Just refer to SMP rather than such overlap

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Landscape maintenance vehicles will have lower pressure types, and will generally only access relevant areas only when soils are dryer and less susceptible to compaction and waterlogging. The outline LEMP sets out measures to mitigate the impacts and effects of the Scheme upon the landscape, and includes detail of measures to manage vegetation during the operation of the Scheme. This will also ensure proper management of the soils on site, and reduce the potential for the degradation or compaction. Those measures will be followed thus ensuring that vegetation is properly managed and maintained in the operational phase of the Scheme.	responsible for ensuring compliance with measures regularly recorded via an appropriate method to be determined in the SMP. For the LEMP, appropriate survey/s undertaken, and compliance with measures regularly recorded via an appropriate method to be determined in the LEMP. The LEMP will detail the frequency.

Table 5.10: Summary of the operational mitigation and management measures – Socio economics

Commented [PD61]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Disruption to local residents, businesses, and community facility use	Measures to mitigate the effects of visual impacts during operational phase as are outlined in <u>OEMP</u> Table 5.1: Landscape and visual <u>above-</u> <u>Etc</u> Measures to mitigate the effects of traffic during operation are outlined in Table 5.6 Traffic and Transport. Measures to mitigate the effects of noise during operation are outlined in Table 5.8 Noise and Vibration. Measures to mitigate the effects on air quality during operation are outlined in Table 5.10 Air Quality.	

Table 5.11: Summary of the operational mitigation and management measures – Climate change

Commented [PD62]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Impacts on on-site workers from extreme weather events and conditions	Weather conditions will be actively monitored, with forecasts reviewed daily to inform site operations.	Logging of weather forecasts and distribution to site staff and contractors.
	Risk Assessment Method Statements (RAMS) will be developed for site activities, ensuring appropriate safety measures are in place for adverse weather conditions.	Periodic audits of RAMS and staff training compliance.
	Staff will be provided with climate-appropriate PPE and trained in extreme weather response protocols.	
Damage to equipment from extreme weather events / climate conditions	Equipment, plant, and materials will be selected to meet industry standards for resilience against extreme weather conditions and to withstand the range of climatic conditions predicted to occur in the future.	Routine inspection and maintenance of equipment and drainage infrastructure.
	Regular maintenance checks will be undertaken to ensure there are no defects that could be vulnerable to extreme weather events.	Incident reporting for any weather-related damage.
	Drainage systems will be regularly <u>inspected and</u> maintained to prevent flooding.	
Increased risk of flooding	This matter is dealt with in Table 5.4 in respect of measures for hydrology and flood risk	Follow monitoring measures set out in Table 5.4.
Release of greenhouse gas emissions from operational activities and periodic replacements	Sustainable methods of working will be adopted for maintenance activities and periodic replacements as far as practicable, including: Regular planned maintenance of the plant and machinery to optimise efficiency.	Periodic review of operational energy consumption and emissions.

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
	Implementing measures to decrease fuel use by maximising efficiencies, and avoiding engine idling. All members of the supply chain providing a carbon reduction plan <u>where feasible</u>. Staff and contractor travel will be managed to reduce emissions where reasonably practicable, including by encouraging car sharing, lower-carbon travel modes and use of EVs. Lower-carbon fuels, including HVO or equivalent sustainable biofuels, will be considered for operational plant where compatible and practicable. Staff travel and site operations will be optimised to minimise emissions. The embodied carbon of materials and components will be factored into the procurement process for any repairs and replacements, and where reasonably practicable lower-carbon or locally sourced materials will be selected, in order to minimise the Scheme's lifecycle greenhouse gas emissions.	
Fugitive emissions of sulphur hexafluoride (SF6) from gas-insulated electrical equipment	SF6-free electrical components will be prioritised wherever feasible to eliminate emissions from gas-insulated switchgear and transformers. For any equipment that <u>is required to use</u> SF6, only sealed-for-life components with extremely low leakage rates will be used to minimise fugitive emissions. Routine inspections of electrical equipment <u>containing SF6</u> will be conducted to detect and prevent leaks. End-of-life disposal of SF6-containing equipment will follow best practice handling procedures to prevent atmospheric release.	Regular equipment inspections to ensure SF6 containment integrity. Monitoring and reporting of SF6 usage, leakage rates, and disposal practices.

Commented [PD63]: Too loose wording: SMART

Table 5.12: Summary of the operational mitigation and management measures – Waste

Commented [PD64]: See comments to Table 5.1

Potential Impact being managed / mitigated	Mitigation and/or management measure to be implemented	Requirement for monitoring
Generation of waste during maintenance activities and periodic replacements	A Waste Management Plan (WMP) will be implemented to ensure compliance with the Waste Hierarchy (prevention, re-use, recycling, recovery, and disposal as a last resort). Waste from operational activity (site offices & welfare facilities, maintenance of construction vehicles, packaging from incoming materials, etc.) to be separated/segreated into main waste streams and stored appropriately prior to collection by an approved waste contractor. Toxic and / or hazardous waste must be treated by an authorised operator. Transportation of hazardous waste will also require an authorised carrier. The volume of waste streams generated by the Scheme to be estimated and monitored, and goals set with regards to the waste produced, re-use and recycling, and off-site disposal.	Register of waste loads maintained to track volumes and types of waste generated. Regular audits to assess compliance with waste reduction measures.
End-of-life waste from solar panels and battery storage systems	Any Solar panels that need to be replaced will be dismantled and sent to specialist PV recycling facilities, where materials such as silicon cells, polymers, and metals will be recovered. Battery Energy Storage Systems (BESS) will be refurbished, repurposed, or recycled where feasible, reducing disposal requirements. Any Transformers and inverters that need to be replaced will be either reused or sent for metal recovery at authorised recycling facilities.	Documentation of panel and battery disposal or repurposing. Periodic review of emerging recycling technologies to maximise material recovery.

5.06.0 IMPLEMENTATION OF MANAGEMENT PLAN

5.1.16.1.1 The OEMP will define all responsibilities roles and actions required for implementation of the measures that are set out in this oOEMP. These will include as a minimum:

- The team roles and responsibilities, along with the named individuals fulfilling those roles. An organogram and contact directory will also be included;
- The procedures required for monitoring, inspection, and reporting of site operations;
- Document control systems and procedures;
- Details of the communication strategy (stakeholders and third parties);
- Details of the required training for key personnel on environmental topics relevant to the Scheme and OEMP. This will include information on toolbox talks and on-site briefings necessary to ensure that relevant staff and site operatives are aware of environmental control requirements and procedures, and have the necessary knowledge to implement them;
- ~~Details of m~~Measures to ensure staff and personnel are ~~advised~~informed of changes to circumstances as work on the Scheme progresses; and
- Procedures for environmental emergencies.

Commented [PD65]: Suggest that this sits within an overall 'Introduction to Management Plan' report to attain absolute clarity, roles, responsibilities, FTE vs PtE, programme (monthly, seasonal, annual, 10-years, etc).

Current this statement has nil detail.

6.07.0 MONITORING AND MAINTENANCE

6.47.1 Monitoring

6.4.47.1.1 To ensure and demonstrate compliance with the measures set out in the OEMP, monitoring and reporting will take place throughout the operational phase of the Scheme. This process will also include oversight of the resulting reporting to ensure that corrective action is taken where necessary. Details of monitoring, inspection and audits to be undertaken will be provided in the OEMP.

6.4.27.1.2 The Environmental Manager will regularly observe site activities and in particular will attend when new activities first occur, to ensure compliance with the OEMP, raise deviations where they occur, and to monitor actions and conditions on the site. They will also undertake regular walkover surveys of the site to monitor compliance with the OEMP. They will also undertake regular inspections as required by the OEMP and overall audits of the OEMP to ensure compliance with its requirements. They will also meet regularly with the Site Manager to discuss the operation of the Scheme and any issues arising from that or their inspection/monitoring activities. They will also undertake day-to-day contact with relevant local authorities and other regulatory agencies such as the Environment Agency.

6.4.37.1.3 All activities observed by the Environmental Manager, the results of surveys and inspections undertaken by them, and reports produced by them will be documented and logged.

6.4.47.1.4 Where complaints are received from members of the public these will be logged by the Site Manager in a record keeping system. These logs will include details of the complaint, and actions arising from the same.

6.4.57.1.5 Similarly, where matters or complaints are raised by the CLG, these will be logged by the Community Liaison Officer in a record keeping system. These logs will include details of the matter/complaint, and actions arising from the same.

Commented [PD66]: Suggest that this sits within an overall 'Introduction to Management Plan' report to attain absolute clarity, roles, responsibilities, FTE vs PtE, programme (monthly, seasonal, annual, 10-years, etc).

Current this Chp may conflict, miss objectives, etc across the broader remit.

The Management Plans should be read as a suit of supporting documents, rather than stand-alone Plans. There is absolute concern that as presented there may be gaps to are not identified/ addressed.

~~6.1.6~~7.1.6 All complaints will be reviewed by the Site Manager, Community Liaison Officer, and Environmental Manager, and the result of the review and any corrective actions taken will be logged. The Complaints Log will be reviewed for signs of wider on-going issues, and where these are identified corrective action will be taken.

~~6.2.7.2~~ Record keeping

~~6.2.17.2.1~~ A Quality and Safety Management Systems (QMS) and Environmental Management System (EMS) will be provided. These will be certified in line with the ISO 14001 standards (or any equivalent standard in place during the operational phase).

~~6.2.27.2.2~~ Those systems will ensure that records are kept of monitoring, recording, and implementing of environmental management measures for the Scheme. This is vital to ensuring that the Scheme is delivered with a high standard of environmental control throughout the operational phase of the Scheme, and that corrective actions are undertaken.

~~6.2.37.2.3~~ A central record keeping system will be established (by the Quality Manager, or a suitable person with delegated responsibility for the same) which will provide a repository for procedures, checklists, reports and other such measures required for the EMS and QMS. This will include maintaining records of inspections, audits, or other such activity undertaken by internal or external parties undertaking audit of the OEMP and measures therein. These would include the following records as a minimum:-

- Licences, approvals, and other similar regulatory documents.
- Environmental surveys.
- Records of environmental equipment tests.
- The Environmental Action Schedule.
- Records of routine site inspections.
- Details of incidents, breaches of the OEMP, or complaints from third parties, and corrective action taken in respect of the same.

~~6.2.4~~7.2.4 A full review of the OEMP will be conducted during regular intervals and as required to respond to specific issues that may arise. Where a review identifies an issue that requires additional control measures or mitigation to be incorporated into the OEMP, or modifications to existing measures or mitigation, the changes will only be implemented following prior agreement from the Local Authorities.

7.2.5 Records relating to the OEMP will be made available for monitoring compliance with the OEMP upon request by a Local Planning Authority, the Environment Agency, Natural England, or Historic England (or any equivalent successor bodies).

8.0 APPENDICES (AS COMMITTED)

8.1 Replacement campaign notification template [Rep1-066; para 2.5.6]

8.2 Environmental Incident Management and Pollution Prevention Plan (EIMP) template [Ref BBC-RR-136]

8.3 Unexpected Contamination Protocol template [REP3-075; Technical Note para3.9.1]

8.4 Emergency Response Plan template [(REP3-052] oOEMP, para 4.1.44-47)

8.5 Flood Warning and Evacuation Plan template [(REP3-052] oOEMP, para 4.1.57)

8.6 Complaints Register template [(REP3-052] oOEMP, para 4.1.62)

Commented [PD67]: End of review

~~6.2.5~~