

East Park Energy (EN010141) Application for an Order Granting Development Consent
Comments on Site Inspections, Digital Site Survey Material and Assessment of Public Rights of Way and Landscape
Effects at Deadline 4

Reg Identity Number [REDACTED]

Introduction

I wish to raise concerns regarding the extent to which the Examining Authority has been able to independently assess a number of locations that have repeatedly been identified by Interested Parties as being central to understanding the likely effects of the proposed development on landscape character, visual amenity and Public Rights of Way (PROW).

These comments are not intended as criticism of the Examining Authority personally, rather they relate to the evidence-gathering process and whether the information available provides a sufficiently complete understanding of the scheme, particularly in relation to the experience of the landscape from within the site.

Chronology

The first Unaccompanied Site Inspection (USI) took place on 7th January 2026. This inspection occurred before the closing date for Relevant Representations (14th January) and therefore before the full range of location-specific concerns had been submitted by Interested Parties. Following submissions of Relevant Representations, a substantial number of parties identified locations that they considered important for assessment. These included:

- Stop East Park Energy (SEPE) PDA-024
- Bolnhurst and Keysoe Parish Council REP1-09
- Bedford Borough Local Access Forum REP2-058
- British Horse Society PDA-026
- Individual residents, landowners and other Interested Parties

Many of these requests were subsequently reflected in the proposed Accompanied Site Inspection (ASI) itinerary (REP1-065). However, the proposed ASI did not proceed. Instead, the Examining Authority requested a Digital Site Survey produced by the Applicant. There was no explanation as to why the ASI would not be taking place.

A second USI was undertaken on 8 June 2026. This occurred the day before the specific hearing concerning Public Rights of Way. Many specific granular issues were raised at this hearing but the USI had already taken place.

Importance of Ground-Level Assessment

The locations repeatedly identified by Interested Parties were not simply viewpoints from which the scheme could be seen.

Many were locations where the experience of the landscape itself was considered important, including:

- Public Rights of Way within the site
- Bridleways used by equestrians
- Elevated ridgelines
- High points providing panoramic views across the River Kym valley
- Locations illustrating the relationship between topography, settlements and the proposed solar arrays

The concerns raised were therefore not limited to visibility of the development but also related to:

- Landscape character
- Openness of the countryside
- Recreational amenity
- User experience of Public Rights of Way
- Appreciation of topography and landform
- Cumulative landscape effects

These are matters that can only be experienced from ground level.

Pattern of Inspection Coverage

Having reviewed the published site inspection notes and compared them with locations repeatedly requested by Interested Parties, it appears that many of the locations physically inspected were associated with:

- Highway routes
- Construction access points
- Road junctions
- Settlement-edge viewpoints
- Traffic and transport considerations

By contrast, many locations repeatedly requested by Interested Parties appear not to have been inspected on the ground during the published site visits, including locations associated with:

- Interior Public Rights of Way
- Elevated ridgelines
- Panoramic viewpoints
- Recreational routes
- Areas where topography is central to understanding landscape effects

Examples include locations associated with:

- FP13 and FP47, FP26 and BW37
- The western ridgeline near Keysoe
- The higher viewpoints at Hoo Farm
- Parts of the Staughton Moor / BESS area

These locations were repeatedly identified by multiple independent parties throughout the examination process and RRs.

Reliance on Digital Site Survey Material

I acknowledge that many of the locations identified by Interested Parties appear to have been incorporated into the Applicant's Digital Site Survey. However, I remain concerned that virtual material cannot fully replicate the experience of moving through the landscape as a walker, rider or other user of the Public Rights of Way network. Whilst drone footage and digital imagery may be useful in understanding the scale and layout of the proposal, they do not convey:

- The experience of landscape openness
- The changing landform and elevation

- Sequential views experienced along footpaths and bridleways
- The relationship between ridgelines and horizons
- The experience of recreational users travelling through the landscape

These matters are particularly relevant where significant concerns have been raised regarding Public Rights of Way and recreational amenity.

Transparency and Accessibility

A further concern relates to the Digital Site Survey itself. The material was produced by the Applicant and appears to comprise large digital files which may not be readily accessible to all Interested Parties. This makes it difficult for participants to assess. Despite searching the Examination Library extensively I have still not been able to access the video footage. This makes it impossible to judge:

- Whether locations have been represented fairly
- Whether the material adequately reflects the experience on the ground
- Whether important topographical relationships have been accurately conveyed

In contrast, a physical site inspection would have provided a shared and transparent basis for assessment.

Adequacy of Evidence Following the PROW Hearing

The second USI took place before the hearing concerning Public Rights of Way. It only lasted 1.45 hours. Can the ExA assure me that enough time was spent, especially as on this occasion he looked at the wider road network, travelling through Kimbolton to the Junction of the B660 with the A14? A number of detailed and location-specific concerns were subsequently discussed during that hearing, including matters relating to particular footpaths, bridleways, recreational routes and user experience. It is not clear from the published inspection record whether these issues were subsequently assessed on the ground. Large solar NSIP examinations commonly include multiple site inspections, accompanied inspections and on foot assessment of rights of way. In this present examination the proposed ASI did not proceed and many locations identified appear to have been viewed primarily through the Applicant's Digital Site Survey.

Reports from USI 1 and USI 2

It is really hard to follow the route the ExA took on each site visit. There is no clarity of the exact route the Inspector took - a map would have been really useful! There are no details of Footpath or Bridleway numbers, just a vague description of where the ExA stopped or drove and the direction he took or looked. He travelled to Green Ends – actually it is Green End and there is a Green End in Pertenhall as well as Little Staughton. From Moor Rd he travelled approximately 1.5km and then travelled towards Duloe and then on towards the Eaton Socon power station via Bushmeads Rd (should be Bushmead Rd). Again there is no detail of the route he took to get there. Did he view the Little Staughton Airfield Solar, High Wood Solar Farm in Duloe or the Cobholden Solar Farm at the top of Bushmead Rd. Visits to these sites had been requested by several IPs? The ExA certainly would have passed all of them but they are not mentioned in these reports. These seem to be missed opportunities. It seems to be a common theme that not enough time has been spent on these site visits to thoroughly understand the impact.

Conclusion

I respectfully request that the Examining Authority carefully considers whether the current evidence base provides a sufficiently complete understanding of the experience of the landscape from within the site, particularly in relation to Public Rights of Way, cumulative impact, elevated viewpoints and recreational amenity. I further request that appropriate weight is given to the fact that a number of locations repeatedly identified by multiple Interested Parties appear to have been assessed primarily through Applicant-produced digital material rather than through independent ground-level inspection.