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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
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BY ONLINE SUBMISSION ONLY

10th July 2026

Dear Sir/Madam

DEADLINE 4 SUBMISSIONS

Project: East Park Energy

Applicant: BSSL Cambsbed 1 Limited

Your Ref: EN010141

Huntingdonshire District Council (HDC/the Council) has reviewed the Applicant's submission documents and has submitted the following to the Examining Authority (ExA) to date:

- [RR-494] Relevant Representations (14 January 2026);
- [REP1-076] Written Representations (7 April 2026);
- [REP1-077] Summary of RR exceeding 1500 words (7 April);
- [REP1-078] Local Impact Report (7 April 2026);
- [REP2-050] Comments on any updated or additional documents from the applicant and [REP2-051] Comments on responses to RRs (28th April 2026); and
- [REP3-079] Responses to ExQ1 (22nd May 2026).

Responses to ExQ2

It is noted that no questions were directed specifically to HDC, with the exception of Q2.10.4 which was addressed to all parties. Given this relates to surface water, the Council defers to Cambridgeshire County Council as the Local Lead Flood Authority in the first instance. Accordingly, the Council does not propose to provide any further response or comment in relation to Q2.10.4, nor does it wish to add any comments in respect of the other questions raised by the ExA.

Comments on the applicant's revised dDCO

The Council set out at Deadline 2 [REP2-050] that in conjunction with the other Host Authorities (Cambridgeshire County Council and Bedford Borough Council) and in agreement with the Applicant, the Host Authorities had instructed a legal review of the draft Development Consent Order (DCO). Engagement has continued since that submission, including a number of meetings with the Applicant and the exchange of comments and suggested amendments.

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 a later deadline.

Review of Applicant's Outline Management Plans

At Deadline 2 [REP2-050], the Council advised that its review of the Applicant's Outline Management Plans [REP1-032 to REP1-051] would be informed by the above DCO review. This review has now been undertaken and is set out in **Appendix A**.

Review of Applicant's Technical Note on Replacement Works

The Council's Local Impact Report [REP1-078] raised concerns that the Replacement Phase warranted further review and assessment given the 40-year operational period and the likelihood of replacement cycles for both the solar and BESS infrastructure. It is noted that in response to matters raised by the Host Authorities collectively regarding how the Applicant was going to manage replacement works, the Applicant has prepared [REP3-075] Technical Note on Replacement Works. A joint co-ordinated review has been undertaken by the three Host Authorities and the Council's comments are set out in **Appendix B**.

Written Summary of Oral Representations made at Hearings on 9th and 10th June 2026

A Written Summary of Oral Representation Made by Rebecca Condillac (AECOM) on behalf of the Host Authorities at Issue Specific Hearing 3 (ISH3) on 9th June 2026 has been submitted alongside this letter at Deadline 4.

The Council is content to rely upon the written summaries submitted by the other Host Authorities in respect of the remaining ISH3 agenda items, together with the written summaries of oral submissions made collectively on behalf of the Host Authorities at Issue Specific Hearing 4 (ISH4) and Compulsory Acquisition Hearing 1 (CAH1).

Community Benefit Fund

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. It is noted that a CBF is not a planning consideration, but a voluntary commitment as made by this Applicant against this Scheme.

Under correction, it is understood that the Examining Authority at Issue Specific Hearing 3 (ISH3) raised the option that the CBF 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 CBF. While the Council acknowledges the potential role of the CBF, discussions regarding the fund remain at an early stage, is subject to third parties, and no conclusions have yet been reached as to its feasibility, structure, or specific uses.

Monitoring fees

In its Response to ExQ1 [REP3-079], the Council stated that a Planning Performance Agreement (PPA) was not considered an appropriate legal or planning mechanism to secure funding for Biodiversity Net Gain (BNG) monitoring or any other monitoring fees in lieu of a Section 106 agreement.

The Applicant has subsequently engaged with the Host Authorities on a without prejudice basis to explore the potential for a PPA or alternative obligation/side agreement to cover costs associated with the post-consent stage. However, both the Applicant and the Host Authorities acknowledge the Government's recent amendment to the Infrastructure Planning (Fees) Regulations 2024. As of 8 June 2026, these amendments provide local authorities involved in Nationally Significant Infrastructure Projects (NSIPs) with a statutory mechanism to recover costs incurred for the duration of the scheme.

This legislative change is therefore considered to address and resolve the issue of monitoring and/or Section 106 related costs previously raised by the Council in its Local Impact Report [REP1-078] and in its Response to ExQ1 [REP3-079].

I trust that this information is of assistance to you. Should you wish to discuss this matter further then please contact [REDACTED] by email: [REDACTED]@[huntingdonshire.gov.uk](mailto:[REDACTED]@huntingdonshire.gov.uk).

Yours Sincerely

[REDACTED]

[REDACTED] – Head of Planning, Infrastructure & Public Protection (Chief Planning Officer)
Development Services
Corporate Delivery
Huntingdonshire District Council

10th July 2026

Appendix A: Comments on the Applicant's Deadline 3 Outline Management Plan Submissions

This document sets out the comments by Huntingdonshire District Council (**the Council**) on the Applicant's Deadline 3 submissions, namely the outline Management Plans [REP3-048 – REP3-067]. The tables below identify the relevant document under review together with the applicable paragraph, table or reference number, where relevant.

Unless expressly stated otherwise, the Council reiterates and relies upon its previous submissions to the Examining Authority and reserves the right to make further representations where necessary.

The Host Authorities have undertaken a joint coordinated review of the submitted documents, drawing on input from internal specialists and external consultants, AECOM, across a range of technical disciplines. As a result, there may be some overlap between comments on related matters.

This review remains in draft form on the basis that the Applicant may address a number of the observations, comments and requests for clarification through subsequent Examination submissions. The Council remains willing to engage constructively with the Applicant to resolve outstanding matters where possible.

The Council has no comments on, or otherwise defers to Cambridgeshire County Council in respect of matters within its remit, in relation to the following documents:

- Outline Construction Traffic Management Plan (Clean) P03 [REP3-050];
- Outline Public Rights of Way Management Plan (Clean) P03 [REP3-058];
- Outline Waste Management Plan (Clean) P02 [REP3-062];
- Outline Surface Water Management Plan (Clean) P03 [REP3-064]; and
- Outline Heritage Enhancement Strategy (Clean) P03 [REP3-066].

As a general comment applicable to all Management Plans, the Council considers that each Outline Management Plan should clearly cross-reference the corresponding Requirement in Schedule 2 of the draft DCO under which it is secured, approved and implemented. The Council also considers that discretionary wording (for example, the use of “may”) should be reviewed throughout the Management Plans where actions are intended to

comprise secured mitigation, management, monitoring or reporting measures, and replaced with enforceable wording where appropriate in order to provide certainty regarding implementation and compliance.

Outline Construction Environmental Management Plan (Clean) P04 [REP3-048]

Section/Paragraph Number	Council's Comment
Appendix B	The Council notes that the updated 'Ecological Reasonable Avoidance Measures Method Statements' have not been provided for review.
1.1.5	Amended wording requested: "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."
1.2.1	Additional wording requested: "Monitoring and Maintenance – sets out the procedures for monitoring and ensuring compliance with the CEMP, as well as requirements for record keeping, and making information available to registers and the local planning authority as required. "
2.4.3 i)c., iii)a. and k, 2.4.6, 2.5.3, 2.5.10, 2.5.11, 4.1.7, 4.1.25, Table 5.1, Table 5.2, Table 5.5, Table 5.6	Remove reference to 'temporary' access or similar and replace with reference to the 'construction phase' for clarity.
3.1.2	Suggested amended wording: "As a minimum the above roles are likely to be required to support implementation of the CEMP. The requirement for additional roles and details of responsibilities will be confirmed in the final CEMP."
Table 5.3 – Indirect impacts to off-site	Amended wording requested:

habitats, including designated sites for nature conservation Indirect impacts to retained onsite habitats including hedgerows, watercourses and ponds)	“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.”
Table 5.3 – Damage or destruction of bat roosts	As a GLTA has not been undertaken for each of these trees, the Applicant needs to clearly demonstrate the methods that will be put in place in order to provide confidence that bat roosts will not be impacted. That may involve precautionary buffers, sensitive timing or methodology for works and pre-construction surveys. Currently insufficient information to rule out the potential for impacts on trees that may contain roosts.
Table 5.3 – Killing/ injury of amphibians and/ or reptiles	The Council awaits sight of any update to the reasonable avoidance measures (Appendix B). Further clarification is required on the methods to be used to prevent offences in relation to GCN.

Outline Operational Environmental Management Plan (Clean) P03 [REP3-052]

Section/Paragraph Number	Council's Comment
1.1.5	Alternative wording requested: “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.”
1.2.1	Additional wording requested:

	“Monitoring and Maintenance – sets out the procedures for monitoring and ensuring compliance with the OEMP, as well as requirements for record keeping, and making information available to registers and the local planning authority as required.
2.4.10	In response to the matter raised by the Council in the Local Impact Report [REP1-078] regarding replacement works, 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 the major replacement campaign works as set out in the Technical Note does not find itself in the various management plans and could benefit from a sub-section within the oOEMP.
3.1.2	Amended wording suggested: “As a minimum the above roles and responsibilities are likely to be required to support implementation of the CEMP. The requirement for additional roles and details of responsibilities will be confirmed in the final OEMP.”
4.1.11	The OEMP will only cover operation so reference to construction should be removed.
4.1.42, 4.1.52, 4.1.57	Within the oOEMP, the Applicant makes reference to the following Appendices 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: • Unexpected Contamination Protocol template ([REP3-075]; Technical Note para 3.9.1)). • Emergency Response Plan template ([REP3-052] oOEMP, para 4.1.42). • Flood Warning and Evacuation Plan template ([REP3-052] oOEMP, para 4.1.52). • Complaints Register template ([REP3-052] oOEMP, para 4.1.57). 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.

Table 5.11, pg 52	The applicant currently states “All members of the supply chain providing a carbon reduction plan where feasible” however this is considered too loose a specification as currently worded and should be reviewed.
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Outline Decommissioning Environmental Management Plan (Clean) P04 [REP3-054]

Section/Paragraph Number	Council's Comment
1.1.5	Suggested amended wording: “This oDEMP 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 18) of the draft DCO [EN010141/DR/3.1] . Should the Scheme be consented this oDEMP will be developed into a final Decommissioning Environmental Management Plan (DEMP).”
1.2.1	Additional wording requested: “Monitoring and Maintenance – sets out the procedures for monitoring and ensuring compliance with the final DEMP, as well as requirements for record keeping, and making information available to registers and the local planning authority as required. ”
3.1.2	Suggested amended wording: “As a minimum the above roles are likely to be required to support implementation of the DEMP. The requirement for additional roles and details of responsibilities will be confirmed in the final DEMP.”
4.1.8	“This document sets out the principles by which PRow will be managed during the construction, operational and decommissioning phases.” – reference to construction and operational phases should be removed as the DEMP will only cover decommissioning.
Table 5.1 - Potential loss of vegetation during decommissioning	The Council maintain its position that the long-term management of habitats and mitigation features created by the Scheme should remain secured following decommissioning.
Table 5.3	“Retained habitats, including hedgerows, trees, and wetland areas, will be protected using exclusion zones and buffer strips.” - this should include indicative buffer distances for each of these habitats to ensure the target is specific.

Table 5.3 – Damage or destruction of bat roosts	The Council objects to wording that implies tree felling would occur during decommissioning and consider that any such works should only occur by exception and be justified/agreed for specific locations within the DEMP. “Hedgerow removal to be subject to a hand search by the EcoCoW prior to removal.” – this wording should be removed entirely as this should not be the expectation.
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Outline Landscape and Ecological Management Plan (Clean) P04 [REP3-056]

Section/Paragraph Number	Council's Comment
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.
1.1.3	Suggested amended wording: “This oLEMP 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 4) of the draft DCO [EN010141/DR/3.1]. Should the Scheme be consented, the final Landscape Environmental Management Plan (LEMP) produced for any phase of the Scheme will be in substantial accordance with this oLEMP and approved by the relevant local planning authority (LPA) before construction commences.”
2.1.1	Remove following wording from sentence: “which includes land required for permanent and temporary purposes”
2.5.5	Suggested amended wording: “The Scheme Boundary also encompasses part of LCA 1D Thurleigh Clay Farmland, however as only temporary construction phase works are proposed in this area there is limited opportunity for the provision or management of green infrastructure as part of the Scheme.”
2.6.4 – 2.6.5	This section needs some clarification and linking to other measures that are proposed to ensure that these CWS adjoining the Site will be protected against impacts.
Section 3.4	The Council requests greater detail and clarity regarding buffer distances to retained vegetation, trees and public rights of way.

	“A minimum 6m buffer between the fenceline of the solar farm and the surrounding hedgerows or substantial areas of vegetation” - A larger buffer zone is required for the RPA of retained trees. “A minimum 10m buffer between the fenceline of the solar farm and public rights of way” - This needs to be defined to edge of PRoW or centre line. “ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan [EN010141/DR/6.3] incorporates the above buffers to illustrate how the Scheme is likely to come forward.” – The stated buffers are very high level and lack appropriate detail for different types of vegetation and hierarchy of PRoW. Wording “is likely to” is light but with more detail on the design parameters, the design would have stronger parameters to work to.
3.5.4	“448 hectares of grazing pasture or neutral grassland” – based on the translation in Table 1, this title for the landscape proposals is misleading, as the habitat to be created is unlikely to meet any of the neutral grassland definitions within UKHab. Additional wording suggested below 3.5.4 to make clear that it is the BNG habitat types that will be basis for future monitoring: “Table 1 shows the Biodiversity Net Gain (BNG) habitat categories to which these illustrative landscape proposals relate and that will be used as the basis for future monitoring.”
3.6.2	Amended wording suggested to clarify that the minimum BNG commitments identified in paragraph 3.6.1, will be maintained through detailed design: “While 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.”
Table 1	Proposed Native Species Woodland or Woodland Belt - Targeted woodland condition criteria should still be identified, even where poor condition is targeted, to provide a clear and measurable basis for future monitoring. “N/A – poor condition targeted” is not sufficiently specific. Arable Field Margins, Tussocky - This is not by definition within UK Hab a species diverse grassland community. It should be clear what the split is between this habitat type and the more valuable neutral grassland elements (e.g. 48ha arable field margins + 400ha other neutral grassland).

	Native hedgerow (species rich) should be updated to “Species-rich native hedgerow” to match the SBM habitat type. Individual trees – poor targeted condition should be justified i.e. why has it been targeted and has a higher condition been considered.
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.
5.3.9	There are pros and cons to using biodegradable guards. There tends to be a high % of failures due to collapsing and failing of the guards as they biodegrade, prior to establishment of the trees/ shrubs.
5.3.40	Yellow Rattle will require cold stratification to ensure seed will germinate.
6.3.7	There is no quantifiable measure of how much water per plant/ m2 or what events would trigger the need for watering and frequency.
6.4.1–6.4.2	The surveying of existing trees should be annually for trees in proximity to PRow and the permissive routes.
6.5.20	A maximum size should be defined to prevent the piling up and leaving of cuttings on site in an unchecked pile.
7.1.3	Request text is added to advise that the ongoing height management of hedgerow would be lower than the 3 metre as set out in this oLEMP and would be in accordance with the prevailing height of hedgerows in the surrounding area.
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.
Various	Council considers that a number of commitments throughout the oLEMP require stronger drafting to provide certainty regarding implementation, monitoring and long-term management. In particular, discretionary wording (for example, the use of "may") should be reviewed where actions are intended to be secured mitigation, management or monitoring measures, and replaced with enforceable wording where appropriate.

Appendix C: Outline Farmland Bird Mitigation Strategy	The Council comments that the document would benefit from a statement confirming that the oLEMP is a committed document secured through the DCO (Paragraph 1.1.2). ‘Grazing pasture’ is a definition based on the land use rather than the actual botanical composition. Based on Table 1 of the oLEMP this does not include any habitat that would be considered neutral grassland under UK Hab and therefore suggest this landscape group is renamed for clarity (Paragraph 2.2.1). It is suggested that “set out in Table 1 of the oLEMP [EN010141/DR/7.7]” is added to the end of paragraph 2.2.2 for clarity. Additional wording requested at paragraph 4.2.3: “Provide 205 ha species-diverse grassland to be managed under an annual cut and collect management regime attracting invertebrate and small mammal prey to enhance foraging resource”. The Council seeks further detail to confirm the linkage between construction phasing and the provision of mitigation habitats (paragraph 5.2.1), considers the proposed approach to landscaping implementation to be too open-ended (paragraph 5.2.3) and therefore requests a clear timetable for initial habitat creation and completion of landscaping within each phase. The Council further considers that additional detail is required regarding the size and timing of habitat creation areas. A table clearly showing expected habitat losses and gains and when these will occur is required and requested (Section 5.2.4). 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). Additional wording suggested at paragraph 6.1.2: “Habitats will be assessed following the UKHabitat survey methodology, with habitat type (i.e. distinctiveness) determined through the guidance provided in UKHab Version 2.0, and condition assessed in line with the relevant condition sheets for the Statutory Biodiversity Metric (SBM) (as of June 2026) for each habitat type. Monitoring surveys will be undertaken within the optimum botanical survey period, which is generally between April and September.”
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	Finally, the Council notes that, without the data on 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).
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10th July 2026

Appendix B: Comments on the Applicant's Technical Note on Replacement Works [REP3-075]

This document sets out comments by Huntingdonshire District Council (the Council) on the Applicant's Technical Note on Replacement Works [REP3-075]. The table below identifies the applicable paragraph, table or reference number, where relevant.

The Council's Local Impact Report [REP1-078] raised concerns that the Replacement Phase warranted further review and assessment given the 40-year operational period and the likelihood of replacement cycles for both the solar and BESS infrastructure. It is noted that in response to matters raised by the Host Authorities collectively 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.

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 remains in draft with the understanding that the Applicant may address observations, comments and matters of clarification within any further updated submitted material or similar to the Examination. The Council remains open to discussion.

Section/Paragraph Number	Council's Comment
Paragraph 1.1.5	While the Council is in broad agreement with the statement made by the Applicant that the impact, and consequently the assessment/mitigation of the operational (replacement) phase is less than that of the construction phase, such works/commitments as required should still be reflected and set out within the [REP3-052] outline Operational Environmental Management Plan (oOEMP) as works to be undertaken in their own right. For example, the management and maintenance works as provisionally identified in [APP-038] The Scheme paragraph 2.6.5-9 should be transposed into the oOEMP and other relevant Management Plans. Currently this is not evident.

Paragraph 1.1.6	The Applicant's statement, as set out at paragraph 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.
Paragraph 1.1.6	There is concern that the trigger of 'where more than 20%' could be viewed as arbitrary and open to challenge in 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). 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). 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). 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. 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 needs to ensure that there is some mechanism to enable their engagement that is measurable in terms of affect as identified. Further, 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. It is 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 (paragraph 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 being secured. d) In this way, the Council can be notified and be continually 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).
Table 2	At 20% replacement, the single and two-crew options in terms of site activity could 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).

Paragraph 2.3.13	The Council suggest that the assumption that a crew can replace 420 panels per day needs to be evidenced as this is a critical assumption in assessing effect, harm, and mitigation.
Paragraph 2.3.19	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 increase vehicle activity across the entire Site and surrounding area to manage the associated logistics. It is suggested that the Applicant assesses accordingly.
Paragraph 2.3.39	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 this it is extremely unlikely all battery storage units within the BESS would need to be replaced at the same time, or within the same year, however it would be prudent to have measures in place should such an event occur.
Paragraph 2.4.1	The replacement activity will generate the need for staff welfare facilities - it is assumed that these would already be on site having been delivered in the Construction Phase (Site D). It is assumed that no satellite facilities, access routes, and parking will be created for staff during any replacement activity.