

Comments on the Applicant's D3 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCC**) on the Applicant's Deadline 3 (**D3**) submissions. The table below provides the relevant paragraph or reference numbers.

Except where expressly stated otherwise below, the Council reiterates and relies on the comments submitted to the ExA at previous deadlines.

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2.6 Statutory and Non-Statutory Sites or Features for Nature Conservation Plan P03 [\[REP-3-008\]](#)

Topic	Paragraph Number	Council's Comments
Irreplaceable habitat	-	For completeness, the council recommend that the drawings are updated to show all irreplaceable habitat that have been recorded within the order limit, or that could be impacted by the scheme. For example, veteran/ancient trees (identified in the tree surveys and considered in the biodiversity net gain calculations).

Draft Development Consent Order [\[REP-3-010\]](#)

Topic	Paragraph Number	Council's Comments
Draft DCO		Discussions are ongoing with the applicant in respect of changes to the DCO to address matters the councils have raised in previous submissions.

Explanatory Memorandum [\[REP3-012\]](#)

Topic	Paragraph Number	Council's Comments
	9.3.25	Flood Risk Activity permits are within the remit of the Environment Agency, so the council has no comments regarding the removal of section 9.3.25 on page 27, however, the updated 9.3.25 on page 28 refers to the Environment Agency. Environment Agency Flood Risk Activity permits fall under the Permitting Regulations (2016) and not the Land Drainage Act (1991), and therefore further clarification is required. Other than the aforementioned request for clarity, the principle of the updates to section 9.3.25 are acceptable subject to agreeing the wording of the Protective Provisions (Schedule 13, Part 3). At present no response has been received to address this matter raised at RR [RR-150].
	9.4.19 - 9.4.21	CCC requires that it is consulted upon and required to authorise the temporary closure/diversion/permission of vehicular traffic, on any PROW, during the construction operation or decommissioning of the development. This is to prevent any prolonged inconvenience to the public users of the affected PROW.

5.5 Other Consents and Licenses Statement P02 [\[REP3-022\]](#)

Topic	Paragraph Number	Council's Comments
	3.1.13	Flood Risk Activity Permits and responsibilities of main rivers fall within the remit of the Environment Agency. We therefore have no comments to make.
	Page 18 – Table 1	Flood Risk Activity Permits and responsibilities of main rivers fall within the remit of the Environment Agency. We therefore have no comments to make.

6.1 ES Vol 1 Chapter 2 The Scheme (Tracked) P03 [\[REP3-024\]](#)

Topic	Paragraph Number	Council's Comments
Visibility splays	2.4.164	Please can the applicant confirm what is meant by <i>“existing verges and vegetation sitting within or adjacent to visibility splays will be managed to maintain visibility by coppicing vegetation to 1m in height.”</i> The council are concerned this may result in coppicing of veteran / ancient trees or trees with potential to support roosting bats or nesting schedule 1 birds. This is of particular concern given that the ecological assessment to date has: (a) stated that no veteran / ancient trees will be impacted by the scheme; (b) no detailed bat surveys have been completed to identify whether roosts are present in trees on the site and may be impacted by the visibility works (c) management of visibility splays doesn't appear to have been considered within the ecological assessment, particularly for impact on veteran / ancient trees, bats or schedule 1 birds The council seek that the applicant provide further clarification as to what 'coppiced to 1m in height' means and how the ecological features (mentioned above) will be adequately protected.

6.1 ES Vol 1 Chapter 8 Hydrology and Flood Risk (Tracked) P03 [\[REP3-026\]](#)

Topic	Paragraph Number	Council's Comments
Sensitivity Classification Very High - Ecology	Table 8.7, Page 8-43	The Council welcome the addition of irreplaceable habitat to the ecology criteria, as requested in our 'Comments on any updated or additional documents from the applicant' submitted at deadline 2 [REP2-049].
Land Use and Designated Sites	8.6.19	The Council welcomes the addition of Huntingdon Wood, as requested in our 'Comments on updated or additional documents from the applicant' submitted at deadline 2 [REP2-049].
Summary of Baseline, and Sensitivity of Receptors	Table 8.11, Page 8-64	The Council welcomes the addition of Huntingdon Wood within designated sites, as requested in our 'Comments on updated or additional documents from the applicant' submitted at deadline 2 [REP2-049].
Construction Phase Impact Assessment	Table 8.12, Page 8-73 & 8-76	The Council welcomes the addition of Huntingdon Wood (ancient woodland / County Wildlife Site) and notes there will be negligible impact. This addresses the Council's concerns regards adequately assessing impact to ancient woodland / County Wildlife Site as part of the hydrological assessment [REP2-049].
	Table 8.12, Page 75	The updated assessment identifies ancient woodland as a potential sensitive receptor and, whilst the proposed SuDS approach (following natural drainage patterns and providing water quality treatment) is acceptable from a surface water perspective, input from the biodiversity team would also be appropriate to consider whether any additional mitigation is required.
	Table 8.12, Page 78	The assessment notes that water supply would be drawn from a licensed source and groundwater levels are unlikely to be affected by the scheme; however, this falls outside the LLFA's remit and the Environment Agency should be consulted.
Operational Phase Impact Assessment	Table 8.13, Pages 8-80 & 8-84	The Council welcomes the addition of Huntingdon Wood (ancient woodland / County Wildlife Site) and notes there will be negligible impact. This addresses the Council's concerns regards adequately assessing impact to ancient woodland / County Wildlife Site as part of the hydrological assessment [REP2-049].
	Table 8.13, Page 82	The updated assessment identifies ancient woodland as a potential sensitive receptor and, whilst the proposed SuDS approach (following natural drainage patterns and providing water quality treatment) is acceptable from a surface water perspective, and as it related to ecology the council welcomes the response and update to hydrology and flood risk. See comment under REP3-073 below.

	Table 8.13, Page 86	The assessment notes that water supply would be drawn from a licensed source and groundwater levels are unlikely to be affected by the scheme; however, this falls outside the LLFA's remit and the Environment Agency should be consulted.
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ES Vol 1 Chapter 9 Traffic and Transport (Tracked) P03 [\[REP3-028\]](#)

Topic	Paragraph Number	Council's Comments
Forecast Daily Construction Vehicle Trip Generation	9.8.10	The Transport Assessment Team note the revisions which do not lead to any concerns
Impact of Construction Traffic	Table 9.15, Page 76	Transport Assessment Team note the revisions which do not lead to any concerns
	Table 9.16, Page 77	Again, the revisions are noted. However, there are no concerns with the amendments
	Table 9.17, Page 78	The Transport Assessment Team are happy with the revisions and thus have no concerns
	Table 9.18, Page 80	Again, the Transport Assessment Team are happy with the revisions and thus have no further concerns
Driver delay	9.8.25, Page 82	As above there are no concerns in respect of this element of the proposal
	Table 9.20, Page 101	The Transport Assessment Team are satisfied with the revised information and would not raise any concerns as a result of the revisions

ES Vol 2 Appendix 8-1 Flood Risk Assessment (Tracked) P03 Transport [\[REP3-039\]](#)

Topic	Paragraph Number	Council's Comments
	4.3	The council have no comments to make. The council would expect the Environment Agency to review the modelling and confirm acceptability.
	4.4	The applicant has confirmed that there are no offsite impacts and this is therefore supported by the LLFA. The greatest changes in depth are seen within in East Park Site B, which is not within the remit of CCC.
	5.0	The applicant has confirmed that there are no offsite impacts and this is therefore supported by the LLFA. The greatest changes in depth are seen within in East Park Site B, which is not within the remit of CCC.

ES Vol 2 Appendix 9-1 Transport Assessment (Tracked) P03 [\[REP3-043\]](#)

Topic	Paragraph Number	Council's Comments
	Section 3.5	The Transport Assessment Team are satisfied that there are no inherent safety issues on the section of road that would be exacerbated by the development
	5.5	The Transport Assessment Team note the amendments and have no concerns or comments.
	Table 5.5	Again the Transport Assessment Team have no concerns or comments to make. The revisions are noted
	Table 6.4, Page 67	The figures do show a marked increase in the percentage flows. However, the Transport Assessment Team agree that this is due to the very low baseline and thus have no concerns or comments
	6.6.13	The Transport Assessment Team accept that the figures do represent a worse case scenario and that the introduction of minibus pick up would reduce this.
	8.1.19	This paragraph refers to the modelling of the A1/B645 junction although there is no indication as to whether the modelling itself has been updated to reflect the increase in flows through this junction.

ES Vol 2 Appendix 9-2 Traffic Flow Diagrams (Tracked) P02 [\[REP3-045\]](#)

Topic	Paragraph Number	Council's Comments
	Whole Document	Theses appear to be satisfactory, having undertaken 'spot checks'

6.3 ES Vol 3 Chapter 7 Ecology and Nature Conservation Figures P03 [\[REP3-047\]](#)

Topic	Paragraph Number	Council's Comments
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Figure 7-3	Figures 7-3a to 7-3d	No tracked changes version of the document has been provided and therefore, it is difficult to understand what has been altered, since the previous versions. The council assume that all drawings with the original version (P01) indicated on the drawings have not been changed. This suggests that only Figure 7-3 has been updated. The Council seeks confirmation as to what has changed on figures 7-3a to 7-3d
Figure 7-3 – Habitat Survey	Figures 7-3e to 7-3g	The Council welcomes clarification as to the extent of areas of limited survey access.

Outline Construction Environmental Management Plan (Tracked) P04 [\[REP3-049\]](#)

Topic	Paragraph Number	Council's Comments
	4.1.33, Page 32	The Council welcomes the inclusion of a list of sensitive ecological receptors. Huntingdon Wood, linear features and retained individual trees are identified as sensitive receptors <i>“for which lighting control measures will be implemented”</i>. The Council is still concerned that the scheme will potentially result in lighting of these features and that insufficient bat survey work has been provided to be able to determine the level of impact of the scheme on roosting bats as a result of the proposed works. The council seek that further bat surveys are completed in respect of all trees that may be impacted by the proposed lighting for the site. Or alternatively, the lighting scheme should confirm that a dark corridor will be retained around all trees within the site or immediately adjacent to the site, including Huntingdon Wood. The council would ask that the following typos are amended in the paragraph: - Huntingdon Wood Local Wildlife Sites should be Huntingdon Wood County Wildlife Sites (the term Local Wildlife Site is not used in Cambridgeshire) - Bullet point 4 should read ‘ponds; and’

	4.1.34, Page 31	The council welcome the potential of additional ecological receptors being identified through pre-construction. There is reference to barn owls. The council recommend this reference is expanded to other schedule 1 birds.
Summary of the construction mitigation and management measures – Ecology (bats)	Table 5.3, Page 43	It is unclear how the applicant has determined that the trees within the site would only <i>“have the potential to result in low level disturbance to individual bats potentially roosting within trees”</i> without completing any detailed bat roost surveys at the site. It is known that trees in Cambridgeshire support a variety of bats species and types of roosts including maternity roosts and mating roost, as well as roosts supporting ‘individual bats’. Ancient woodland, such as Huntington Woods, also have the potential to support rarer bat species, such as barbastelle bats. Given the lack of bat survey information, the Council is considered that the oCEMP does not adequately mitigate any potential impacts on roosting bats.
	Table 5.4, Page 49	Addition welcomed, no further comments.
	Table 5.8, Page 58	Contamination of ground and controlled waters from bentonite has some additions and may need review.
	Table 5.11, Page 65	Addition of fugitive emissions is welcomed, however no monitoring approach has been included in the table. This should be added.

Outline Construction Traffic Management Plan (Tracked) P03 [\[REP3-051\]](#)

Topic	Paragraph Number	Council's Comments
Highways Condition Survey	5.8	Detailed Design Section has been added – the council support the changes made.
Highways Condition Survey	5.9	Highways Condition Survey Section has been updated and reviewed – the council notes that 5.9.4 remedial works should have a time limit reasonable related to the scale and nature to the defect found in accordance with the county councils HOS document.
Use of Banksman	6.3	The council has no objections to the use of banksman, but it should be indicated that the banksman will control site traffic as and when required however, it should be highlighted that they are not controlling the traffic within the public highway and the construction traffic would remain subservient to the highway.

Highways Condition Survey	6.6	Parking and Onsite Vehicle Management Section has been updated – the council support the changes made.
Highways Condition Survey	9.1	Monitoring and Compliance section has a number of updates – the council support the changes made.
Highways Condition Survey	9.2	Communications Strategy has been updated to include contact methods to the LHA and LPA – the council support the changes made.
Highways Condition Survey	9.3	Enforcement and Corrective Measures Section has been amended – the council support the changes made.

Outline Operational Environmental Management Plan (Tracked) P03 [\[REP3-053\]](#)

Topic	Paragraph Number	Council's Comments
	2.4.10	The council believes more than 20% replacement is not an appropriate trigger and it would be better to reflect the step change from operation to at scale replacement. Whilst accepting the impact is less than at construction, 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). 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. Whilst it is welcome the applicant states any at scale replacement will adhere to the Construction Environmental Management Plan, Public Rights of Way Management Plan, Construction Traffic Management Plan and Operational Environmental Management Plan, the council believes the applicant needs to demonstrate to the authorities ahead of at scale replacement an assessment of the impacts has been carried out and the mitigation

		measures proposed are appropriate. Discussions are ongoing with the applicant to resolve this matter through further updates to the Management Plans.
	Table 5.5, Page 41	"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. "...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, especially if there is to be any review of identified impacts and the mitigation measure proposed by the applicant. 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. It is suggested HGV movements extending through Great Staughton. At the construction phase this is 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. The council welcome 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.

Topic	Paragraph Number	Council's Comments
	5.3.46	Both Cambridgeshire and Bedford Borough would welcome discussions with the applicant about the proposed steps in the event of anti-social behaviour. The LHA would request entry into a formal agreement outlining the terms, and introduction of a mechanism for ensuring the terms are observed.
	6.5.47	The Council welcomes the commitment to seeding 'Open Grassland suitable for Ground Nesting Birds' as part of Site Preparation Works prior to construction.
	8.2.5 7 Table 8.2, Page 78 - 79	The Council welcomes the inclusion of ecological monitoring to meet industry standard. However, the Council still considers bespoke surveys / research for skylark, which will be adversely impacted by the scheme, is still inadequate – please see response to Outline Farmland Bird Mitigation Strategy (para 6.1.5-6.1.6), Appendix C below.
Outline Farmland Bird Mitigation Strategy	Table 4.2, page 19-20	We welcome the inclusion of the size of areas to be allocated for ground nesting birds (total of 125 ha). However, we are still unclear how this relates to the number of skylark territories that will be lost or created as a result of the scheme. It also doesn't provide adequate figures to show the scheme will result in greater skylark productivity and therefore the assumptions the scheme will support nesting skylarks from surrounding farmland. We suggest that further assessment, such as the usage of a 'skylark metric' are undertaken to demonstrate the mitigation is adequate.
Outline Farmland Bird Mitigation Strategy	Appendix C, Table 4.2, page 19-20 & Open Grassland for Ground Nesting Birds - Sheet 3 of 3 drawing	Site C is shown to contain three defined areas of Open Grassland suitable for Ground Nesting Birds – areas 6, 13, 15. The council assumes these have been separated because they are defined fields, with boundaries that easily separate the sections and help calculate the already available land for skylarks (given the assumptions they will not nest within 50m of a boundary). However, the council are unclear why Area 6 was not separated into two smaller areas, given that the location of a permissive path through the field which may act as a boundary feature / barrier to ground-nesting birds. We welcome further clarification from the applicant on this issue, and whether the potential impact of a footpath has been already factored into the mitigation calculations.

Outline Farmland Bird Mitigation Strategy	Appendix C, 6.1.5 - 6.1.6, page 28,	While breeding bird surveys is welcomed for assessment of farmland bird assemblage; we consider it not adequate to demonstrate that the level of impact (positive or negative) for skylarks. Therefore, we seek a more robust research to be completed to demonstrate that the assumption that the solar farm will delivery increased skylark productivity, and that assumptions made in the skylark mitigation were correct. The data should also be utilised to inform future skylark 'metrics' / mitigation schemes for large scale solar farms.
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Outline Public Rights of Way Management Plan (Tracked) P03 [\[REP3-059\]](#)

Topic	Paragraph Number	Council's Comments
	7.1.16	Any temporary closures or diversions to public rights of way during the Operational Phase to provide for maintenance activities must be approved through the correct processes with a Temporary Traffic Regulation Order (TTRO) being applied for and accepted by the LHA before any temporary closure or diversion is implemented.
	7.2.4	Both Cambridgeshire and Bedford Borough 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. CCC would request entry into a formal agreement outlining the terms, and that introduces 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].
	9.1	Monitoring reports should be shared with the LHA.
	9.4	Any permanent repairs to PROW surfaces should be agreed with the LHA.
	6.16.3, 6.17.3, 6.17.6, 6.18.3, 6.19.3	We 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.

	7.1.5	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.
	6.17.7, 6.18.4	Use of 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 closed to the public is made clear to all potential users.
	6.18.1, 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 traffic will have no direct impact on Footpath 112/8.

Outline Surface Water Management Plan (Tracked) P03 [\[REP3-065\]](#)

Topic	Paragraph Number	Council's Comments
	6.3.2	The climate change allowances appear to have been updated which is supported by the LLFA, however, Table 2 'Greenfield Runoff Rates' still refers to a 20% allowance rather than a 40% allowance. It remains unclear why the Greenfield runoff rate for the climate change scenario would be increased as suggested in Table 2. In accordance with Environment Agency guidance the 3.3%AEP storm event should also include an allowance for climate change.
	6.4.4	Section 6.4.4 refers to a total depth of the basin as 1.5m, which includes 300mm freeboard, however, section 6.5.10 refers to a <u>water depth</u> of 1.5m. The applicant must clarify maximum water depths in each design storm and the firewater scenario along with the available freeboard for each.
	Annex 1	Discharge rates At present the discharge rates seem excessive. Annex 1 shows that the 1 in 100 year greenfield runoff rate is 6.36l/s/ha. Which, based on an impermeable area of 2.7ha, would suggest the greenfield runoff rate for the impermeable BESS area in the 1 in 100 year + 40% CC storm event should be 17.17l/s. It therefore remains unclear as to why a discharge rate of 24.95l/s is proposed and used to assess the required volumes of attenuation. The same applies for the storage calculations in relation to the main swale.

		Long term storage The drainage strategy appears to adopt a flow matching approach rather than limiting discharge to QBar; therefore the applicant will need to demonstrate how increases in runoff volumes will be mitigated, typically through provision of long-term storage, which has not been set out within the report. Firewater volumes Annex 2 states that the storage feature should be able to accommodate the entire firewater stores of 456m³. Section 6.4.5 of the report sets out that the remaining available volume of 1,448m³ is approximately equivalent to the storage volume required for the 2% AEP plus climate change storm event. No evidence has been provided to demonstrate that this is the case. Outline drainage plan The report sets out appropriate best practice design principles (e.g. side slopes, top area of basin and depths); however, these should also be clearly reflected on the drainage plan demonstrating that this design can be provided within the order limits.
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Outline Heritage Enhancement Strategy (Tracked) P03 [\[REP3-067\]](#)

Topic	Paragraph Number	Council's Comments
	6.2.2	We welcome paragraph 6.2.2 and the maintenance proposed pursued to the final Historical Enhancement Strategy.

Biodiversity Net Gain Report (Tracked) P03 [\[REP3-069\]](#)

Topic	Paragraph Number	Council's Comments
	4.1.5	The Council welcomes clarification regarding how BNG uplift will be implemented on the River Kym and notes it will be delivered through enhancement of land within 10m of the watercourse, rather than in-channel enhancements. The Council's position [REP2-049] remains, that opportunities to maximise biodiversity enhancement of the watercourses, including enhancements to in-channel habitats, should be explored.
Other Mitigation and Compensation Measures	5.2.3 & 5.2.4	The Council welcomes details provided regarding the amount biodiversity units of the scheme that will form great crested newt mitigation (under licence) and farmland bird mitigation. The Council is satisfied these habitats form part of the baseline, and do not include the BNG 10% uplift and are therefore in keeping with the rules / guidelines of delivering biodiversity net gain.
Statutory Biodiversity Metric	Appendix A, Irreplaceable area habitats on-site, page 14,	There appears to be some text missing / not visible within the 'User comments' column for the individual trees – rural trees. Please can the cell be enlarged to allow all text to be read.
Statutory Biodiversity Metric	A-1 On-Site Habitat Baseline	The council assume the rural tree category only includes veteran / ancient trees, given the comments (regarding 18 veteran and 5 trees with veteran features) and that the area of rural trees is identical to the irreplaceable habitat (listed on the previous page). The council are concerned that: 1. The value of irreplaceable habitat (e.g. veteran / ancient trees) should not be included in the on-site habitat baseline, as explained within paragraph 8.4 of Defra (2026) Nationally significant infrastructure projects: biodiversity gain statement for energy: <i>"8.4. All irreplaceable habitats must be recorded in the irreplaceable habitat sheet of the biodiversity metric tool as detailed in the user guide. However, the biodiversity value of the irreplaceable habitat will not be included in the baseline"</i>. 2. The on-site habitat does not include other individual trees (not classed as veteran / ancient) located on the scheme. We refer the applicant to at least 33 trees shown on the Figure 3 – Habitat Survey of 6.3 ES Vol 3 Chapter 7-3 Ecology and Nature Conservation Figures P03 [REP3-047], and assume at least some of these trees are not classed as irreplaceable habitat.

		The council seek the applicant clarify how individual trees are categorised on the on-site habitat baseline calculations, and clarify why irreplaceable habitat has been included.
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Applicant Response to Deadline 2 Submissions - Host Authorities and Statutory Environmental Bodies P01 [\[REP3-073\]](#)

Topic	Paragraph Number	Council's Comments
Ecology and Biodiversity – Great Crested Newt	CCC-D2-02, Table 2, page 113	The Council welcomes additional information supplied by the applicant and considers this issue resolved.
Biodiversity net gain (watercourses)	CCC-D2-05 Table 2, page 113	The Council acknowledge that enhancements to tributary of the River Kym may be constrained by the scheduled monument. However, part of the tributary of the River Kym falls outside of the scheduled monument, and, there might be some opportunities to work with the project archaeologist to identify opportunities to enhance the watercourse for benefit of both archaeology and biodiversity. The Council notes the commitment within Table 13 of the Design Parameters and Principles Statement [REP1-030] to enhance watercourses and seek commitment from the applicant that this will include exploring opportunities to enhance the tributary of the River Kym.
Biodiversity Net Gain – S106	CCC-D2-06	The Council agrees that delivery of Biodiversity Net Gain could form part of the monitoring of DCO requirements, specifically delivery of the Landscape and Ecological Management Plan – with the final LEMP including a Biodiversity Net Gain Habitat Management and Monitoring Plan. The Council still considers a S106 agreement, rather than a PPA, to be the most appropriate way to ensure adequate resources / officer time can be secured to participate in the Landscape and Ecological Management Plan Steering Group – which will review monitoring documents, including delivery of Biodiversity Net Gain, and ensure scheme is delivering on its commitments,

Hydrology and Flood Risk [REP1-010]	CCC-D2-48 to CCC-D2-52, pages 130-131	The Council welcomes the response and updated Hydrology and Flood Risk [REP3-026] relating to wildlife sites, ancient woodland and irreplaceable habitats – these issues are considered resolved.
Ecological Baseline Report [REP1-025]	CCC-D2-55 - CCC-D2-55	The Council considers the issue regarding the missing 'areas of limited access' resolved.
Great Crested Newt	CCC-D2-56	The Council considers the issue regarding the lack of Great Crested Newt survey work is resolved
Reasonable Avoidance Measures Method Statement – breeding birds	CCC-D2-59	The council welcome the update to table 5.3 to include land that has been left fallow – issue resolved.
Farmland Bird Mitigation	CCC D2-62, page 135 CCC D2-65	The Council welcomes the evidence provided regarding skylark breeding success of different habitat, albeit recognising there is limited data regarding the usage of grassland for these species, with the applicant concluding that skylark productivity increases on set a side of x2.5 that of spring cereal. This calculation is useful; however, it doesn't fully demonstrate how the number of territories / breeding success of the proposed Outline Farmland Bird Mitigation compares with the baseline. Based on grassland / set-a-side delivering x2.5 skylark productivity of spring cereal, we would assume that the outline bird mitigation areas are of insufficient size to off-set the current availability of skylark habitat within the scheme. Since Deadline 2, a new Solar Energy UK (2026) publication about solar farms and skylark publication has been published (see link below). This shows there is no standardised measures for skylark mitigation and solar farms, it does refer to two published mitigation frameworks - Fox (2022) and Arventus (2025) pilot 'skylark metric'. The Arventus 'skylark metric' takes into account increased carry capacity of adjacent fields and creation of high-quality grassland within the solar farm and calculates potential displacement / loss of individuals. It is also stated that RSPB and Natural England have had sight of the pilot Arventus 'skylark metric' and have not raised any significant concerns. In light of this, and given that carrying capacity under pins the applicant's skylark mitigation, we seek the applicant to confirm how this scheme compares to these mitigation frameworks

		and how applicable it is to large solar farms of size of East Park. Confirmation is also sought that Natural England consider this metric approach to be the most effective tool available for measuring impacts to skylarks. If it is demonstrated, through the mitigation frameworks that off-site mitigation is required, we are in agreement that skylark plots are ill-advised. Instead, the applicant should be looking for delivery of set-a-side / grassland habitat to be managed for benefit of nesting skylark for the duration of the operational phase of the scheme. We do appreciate that these impacts to skylarks are ‘temporary’ in planning terms. The skylark population has continued to decline for the last 50 years, with the UK breeding population declining by 9% between 1995 to 2024 (Heywood <i>et al</i> 2026). Therefore, impacting their population for the next 40 years will have a lasting impact beyond the lifetime of this development – for which will take generations to recover. The Council would like to reiterate that adverse impacts to skylarks continue to be a key issue relating to all types of development across the county, whether it be transport and infrastructure, housing development or solar farms (both small and large scale). Therefore adverse impacts to skylarks are considered unacceptable. The approach to skylark mitigation schemes throughout Cambridgeshire is to compensate skylark territories on a 1:1 basis - for example, Sunnica solar farm and housing development at Northstowe and Eddington (new towns). The Council’s position to seek compensation of 1:1 territory for East Park is therefore considered consistent with other schemes; unless evolving skylark metrics can be demonstrated to apply and deliver a more effective approach to skylark conservation. Citations: Solar Energy UK (2026) Solar Farms & Skylarks publication Heywood, J.J.N., Massimino, D., Baker, L., Balmer, D.E., Brighton, C.H., Kelly, L.A., Noble, D.G., Pearce-Higgins, J.W., White, D.M., Workman, E. & Wotton, S. 2026. The Breeding Bird Survey 2025. BTO Research Report 802 British Trust for Ornithology, Thetford, Norfolk
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Farmland Bird Mitigation monitoring	CCC-D2-63, page 138 & 139	We welcome the update to the monitoring scheme within the Outline Landscape and Ecological Management Plan to reflect industry standards. However, we are still concerned about the lack of monitoring for skylarks, to adequately demonstrate the proposed mitigation will be effective. We note reference to ‘skylark is a species subject to extensive research’, however we have seen no research specifically linked to large solar farms of the equivalent size to East Park. As discussed above, there is no standardised national approach to skylark mitigation for solar farms. Given this lack of data, that skylarks are the key species that will be adversely impacted by solar farm, and that the Arventus ‘skylark metric’ is still a pilot, the Council considers it proportionate for complete detailed surveying of skylark productivity associated with the solar farm to monitor whether skylark mitigation and assumptions on which it is based are correct. The Council therefore strongly recommends detailed skylark research is completed during the operational phase of this development, which can then be utilised to improve efficiencies of future ‘skylark metrics’ and skylark mitigation for future NSIP projects.
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