



EAST PARK ENERGY

East Park Energy

EN010141

Applicant's Response to Deadline 3 Submissions – Other Interested Parties

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1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This document sets out the responses of BSSL Cambsbed 1 Limited ('the Applicant') to Deadline 3 submissions submitted by Interested Parties in relation to the Development Consent Order (DCO) application for the East Park Energy project (the 'Scheme').
- 1.1.2 The documents submitted with the application and at previous examination deadlines are referenced using the reference number assigned by the Planning Inspectorate (PINS) i.e. **[APP-XXX]**. Where application documents have been updated based on feedback received at Deadline 3, this response document sets out that the relevant updated document is "**[as updated alongside this submission]**".
- 1.1.3 In preparing this document, the Applicant has sought to avoid repeating points made in other submissions where practicable. In addition, the Applicant has only responded to substantive points, in particular where the Applicant considers matters set out in the application have been misunderstood/misinterpreted, or the interested party has requested clarification, additional information or has raised a point of disagreement that may not have been addressed in the Applicant's previous written submissions.
- 1.1.4 Accordingly, whilst the Applicant has considered all submissions made at Deadline 3, the Applicant has only responded to a selection and has not responded to every individual submission.

1.2 Note about National Policy Statements

- 1.2.1 Section 1.6 of the 2026 NPS EN-1 confirms that for schemes accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect. East Park Energy was accepted

for examination in October 2025 prior to the final publication of the 2025 amendments. The 2024 NPSs therefore have effect for decision making.

- 1.2.2 All references to the NPSs in this document made by the Applicant are to the 2024 NPSs unless stated otherwise.
- 1.2.3 The Applicant has prepared a separate **Note on updated National Policy Statements EN-1, EN-3 and EN-5 [PDA-018]**.

2.0 RESPONSE TO OTHER INTERESTED PARTIES

2.1 Response to British Horse Society - Bedfordshire

Table 1: Response to British Horse Society – Bedfordshire Comments on D2 Submissions (REP3-087)

Our Ref.	Ref.	BHSB Comments	Applicant Response
BHSB-D3-01	BHSB-WR-02	The Applicant acknowledges that the provision of a permissive route is a more limited public benefit than a permanent PROW. The route is already a permanent PROW, being a footpath, so the impact of agreeing to an upgrade to bridleway status is not a major change for the Applicant or the landowner but would be of significant long term benefit to local riders. The Society remains of the view that only dedication (or agreed creation) can provide an appropriate mitigation for the permanent adverse impact on views from other bridleways as a result of the development. The ExA will no doubt consider the balance the of the adverse impacts on PROWs and the limited permissive mitigation offered.	The Applicant has no further comment to make, and agrees it is for the ExA / Secretary of State to consider this matter as part of the wider overall planning balance. The Applicant has set out its consideration of the overall planning balance in Section 8 of the Planning Statement [APP-031] and considers the adverse visual effects on PROWs should attach great weight (Table 4 [APP-031]), whilst the benefits provided in delivering additional recreational opportunities should be afforded limited weight (Table 3 [APP-034]).
BHSB-D3-02	BHSB-WR-03	In our response (REP2-061) to the Applicant's responses to our RR-1253 (REP1-055 and REP1-056), we set out in some detail why we find the Applicant's proposals to address our safety concerns totally implausible and impractical. In summary, the proposed banksman will not be able to see all approaching horses,	The Applicant has provided a response to this matter with reference to BHSB-D2-03 to BHSB-D2-06 in the Applicant Response to Deadline 2 Submissions - Other Interested Parties [REP3-074]. The Applicant maintains that the mitigation measures put forward would ensure the safety of all PROW users.

Our Ref.	Ref.	BHSB Comments	Applicant Response
		• the suggestion that lorries stop or follow at a distance is unrealistic and could create further safety issues, and • the idea that instructions to stop work can be communicated in time is implausible. I would like to point out that, as I no longer ride, this issue is of no direct concern to me. I am however concerned about the safety of local riders and their horses, particularly the young boy I have previously mentioned who has no access to alternative off road routes. The Society remains of the view that the only safe option here is to provide an alternative diversion further away from the construction traffic and activity. This is within the gift of one of the landowners who is benefitting from this development. To continue with the current proposals is to close the bridleway to equestrian users during construction hours, without acknowledging that this is the case. And thus to deprive some local riders of access to off-road riding for some 18 months (possible two summers). Alternatively, the Applicant could consider removing the panels from the section alongside the bridleway on the ridge at the western end of the development. This has already been suggested by Bolnhurst Keysoe Parish Council to address visibility issues (REP-128). Access to and cabling from the other panels in Site A would via the access roads within the northern array areas. This would remove the need for any construction traffic to use the bridleway to the west of the Manor Farm, save for about 100m to reach the track to the panels within Site A that are next to the B660. Array installation and cable laying on or adjacent to this BW could be	

Our Ref.	Ref.	BHSB Comments	Applicant Response
		eliminated. There would be some installation noise alongside BW44 near Middle Lodge, which should be manageable for the presumably small period of time involved, as alternative equestrian routes would be available. The traffic associated with the green infrastructure installation could also be diverted away from the BWs for the most part and presumably the work involved would not be unduly noisy nor require the vibration inducing pile driving associated with panel installation.	
BHSB-D3-03	BHSB-WR-04 and 05	The Applicant acknowledges the concern about the safety of horses on the road but fails to accept that more could be done to reduce the risk to local riders. It appears to the Society that the statement that “The Applicant has sought to minimise where possible use of the local highway” is inaccurate. We have pointed out three changes that could be made to the construction access strategy that would reduce significantly the use of roads used by horses (and cyclists) as part of the prescribed routing for construction traffic. The safety measures referred to (driver induction and awareness, compliance with the Highway Code, speed management and signage) are potentially helpful though we are all aware that HGV drivers are not 100% reliable in observing such things. The only sure way to reduce the risk is to genuinely minimise the use of these small country lanes by HGVs.	The Applicant has provided a response to this matter with reference to BHSB-D2-08 in the Applicant Response to Deadline 2 Submissions - Other Interested Parties [REP3-074] .

Table 2: Response to British Horse Society – Bedfordshire Response to ExQ1 (REP3-089)

Our Ref.	Ref.	BHSB Comments	Applicant Response
BHSB-D3-04	Q1.11.7	There are a number of PRow organisations that could sensibly be invited to participate in the community liaison group in relation to alterations to the PRow network: The Local Access Forums (LAFs) are independent, statutory advisory bodies established under the Countryside and Rights of Way Act 2000. Their core role is to advise local authorities, Natural England, and other decision-makers on improving public access to land for outdoor recreation, enjoyment, and sustainable travel. At a minimum, in our view, the two LAFs covering the area – Borough of Bedford and Cambridgeshire – should be participants. There are a number of individual user groups representing different user categories and the British Horse Society (equestrians) and the Ramblers (walkers) have participated in this examination. Certainly, the BHS would like to be included, and we assume that the Ramblers would too. We are not aware of any cycling groups that have shown a particular interest – though there are cyclists within the membership of the LAFs.	The Applicant agrees that the two Local Access Forums, the two British Horse Society branches, and the Ramblers would be invited to join the Community Liaison Group, should they so wish.

2.2 Response to British Horse Society – Cambridgeshire

Table 3: Response to British Horse Society – Cambridgeshire Comments on D2 Submissions (REP3-091)

Our Ref.	BHSC Comments	Applicant Response
BHSC-D3-01	The Applicant's response to our WR is set out in Table 9 of its response document and amounts to a complete refusal of our and CCC's request. The Applicant does not appear to understand that the provision of additional public rights of way is one of the relatively few ways in which it can mitigate the adverse impact of the development on local communities. Permissive access has been offered but (with one exception in Site B in Bedfordshire) this additional access is for walkers only. The BHS position, which we believe to be supported by CCC, is that such permissive access should be available to all members of the community – walkers, off-road cyclists and equestrians as all member of the community suffer the adverse effects of the development. We continue to press for equestrian access to be included within the proposed additional access in Site C. The five comments we made about such access stand (points 2 and 3 have been combined within Table 9).	The Applicant has engaged with Historic England in relation to the positioning of the permissive access in this area, and for reasons of site security both to the Scheme and the archaeology is not seeking to extend the permissive access to the highway to the south – instead preferring a single public access to the scheduled area from the direction of Great Staughton to the north. The Applicant has further engaged with landowners at Site C and is not in a position to agree further permissive access within the Site C area. The Applicant's position, as set out previously, is that whilst this additional permissive access would be a potential further enhancement, it is not essential mitigation required to make the Scheme acceptable. Mitigation measures to ensure the safety of PRoW users are set out in the outline Public Rights of Way Management Plan [REP3-058].

2.3 Response to Bedford Local Access Forum

Table 4: Response to Bedford Local Access Forum Comments on D2 Submissions (REP3-085)

Our Ref.	Ref.	BLAF Comments	Applicant Response
BLAF-D3-01	BLAF-WR-01	This response would imply that the Applicant can see benefits in providing such a route but can not do so due to the need to provide an additional bridge. The cost of a footpath bridge must be insignificant compared to the total cost of this development and would not appear to us to be sufficient grounds for rejecting our proposal.	As the Applicant has set out previously, and as was explained during Issue Specific Hearing 3, the Applicant has not currently got agreement with the landowner to provide this structure. It is also not the cost of a structure which is a restriction, but that the Pertenhall Brook is a main watercourse with areas of adjacent flood risk. The Applicant would require not only the consent of the landowner to provide this route, but also permits from the Environment Agency. The Applicant is not currently pursuing this additional permissive connection.
BLAF-D3-02	BLAF-WR-02	A definitive map modification order can easily be made for this short connecting route based on the fact that it has been used by local walkers for decades. This will involve the significant work by Council officers, as well as by users and the landowner, so our suggestion was to avoid this workload. We hope that the landowner will see the benefit in agreeing to this short connection being recorded on the definitive map and will agree.	The Applicant notes that this suggested route is an existing surfaced track. The Applicant understands this route is not currently formally designated on the definitive map and is consulting with the landowner but is not currently proposing to amend the definitive map in this location.
BLAF-D3-03	BLAF-WR-03	The provision of this connecting route for horses is welcomed but should be a definitive route. In BHSB-WR-02 in Table 10 of the same document, the Applicant acknowledges that the provision of a permissive route is a more limited public benefit than a permanent PROW. The route is already a permanent PROW, being a footpath, so the impact of agreeing to an upgrade to bridleway status is not a major change for the Applicant or the landowner	The Applicant is proposing permissive access, and not the dedication of permanent public rights of way, as this is the position that has been agreed with the landowners.

Our Ref.	Ref.	BLAF Comments	Applicant Response
		and we continue to support the BHS's request for dedicated status. The Applicant has not responded to the comment that all our requested routes should be dedicated.	
BLAF-D3-04	BLAF-WR-04	The Applicant is correct that there is already access between Bolnhurst and Keysoe Footpath 36 and Bolnhurst and Keysoe Footpath 13 but this additional access would create additional circuits that would be attractive to local walkers. This can clearly be seen in the diagram presented in our WR (Request 4). Further, the existing footpaths are all within the development, within corridors, whereas the additional route we have suggested would provide open views, particularly to the west, similar to those that are being lost for these existing footpaths. The suggested route would also pass a section of grassland providing an opportunity to view wildlife.	The Applicant is consulting with landowners but is not currently in a position to propose additional permissive access in this location, and nor is this necessary in order to mitigate the impacts of the Scheme.
BLAF-D3-05	BLAF-WR-05	The Applicant is correct that there are mature hedges along much of the proposed route – but there are several gaps. Furthermore, the provision of such a route would provide a circuit for local walkers, particularly those in the southern part of Pertenhall, connecting to FPs 26, 13 and 47.	The Applicant is consulting with landowners but is not currently in a position to propose additional permissive access in this location.
BLAF-D3-06	BLAF-WR-06	We hope that the consultations with the landowner are successful as this would be an important improvement in PROW user safety. The applicant has not responded to the rest of our WR presented in this comment box – that all additional access should be provided on a permanent basis. And that EN-3	The Applicant is consulting with landowners but is not currently in a position to propose additional permissive access in this location. The Applicant has considered and explored the possibility of all suggested additional permissive or permanent access routes, but as paragraph 2.10.44 of NPS EN-3 notes, this requires

Our Ref.	Ref.	BLAF Comments	Applicant Response
		reinforces national and local policy that additional access should be provided. We note that in document PDA-018, the Applicant has made the case that the Scheme should be determined in accordance with the 2024 NPPs. In our WR we quoted from the para 2.10.36 of the 2025 edition of EN-3 which reads ‘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.’ This wording was in para 2.10.44 of the 2024 NPPs’ EN-3 and so does apply to this Scheme. We concluded that “We restate our belief the opportunities for the developers and landowners to provide some benefit to local residents (and indeed those from further afield) has been largely ignored. Our proposals seek to ensure that the recreation, sustainable transport, enjoyment and health benefits of the PROW network are preserved and enhanced, in accordance with both local and national policy.” Our position is unchanged by the disappointing responses included in the Applicant’s document.	<i>“taking into account, where appropriate, the views of landowners”</i>. The Applicant is in a position where compulsory acquisition powers are not being used for Sites A to D, and therefore agreement is required from landowners for any additional public access onto their land.
BLAF-D3-07	BLAF-WR-07	We will leave it with the host authorities to determine whether they are satisfied that the DCO provides sufficient	The Applicant notes this comment and is consulting with the host authorities in relation to the draft DCO.

Our Ref.	Ref.	BLAF Comments	Applicant Response
		powers for them to ensure that changes to PROWs are made appropriately.	

Table 5: Response to Bedford Local Access Forum Response to ExQ1 (REP3-086)

Our Ref.	Ref.	BLAF Comments	Applicant Response
BLAF-D3-08	Q1.11.7	BOBLAF would very much wish to be included in the community liaison group in relation to alterations to the PRow network. We would regard it as part of our statutory advisory role to do so. The Local Access Forums (LAFs) are independent, statutory advisory bodies established under the Countryside and Rights of Way Act 2000. Our core role is to advise local authorities, Natural England, and other decision-makers on improving public access to land for outdoor recreation, enjoyment, and sustainable travel. We would also welcome the inclusion of other groups representing the main user categories, although our membership does encompass walkers, cyclists and equestrians plus landowners. And we would suggest that the Cambridgeshire LAF should also be a member of this liaison group.	The Applicant agrees that the two Local Access Forums would be invited to join the Community Liaison Group, should they both wish.

2.4 Response to C Patel

Table 6: Response to C Patel Comments on D2 Submissions (REP3-092)

Our Ref.	CP Comments	Applicant Response
CP-D3-01	The Applicant's response set out in its 'Applicant Response to Written Representations' does not adequately address the central issue raised in my Written Representation: that the Application presents East Park Energy as a coherent hybrid solar-and-battery scheme delivering integrated public benefits, while the evidence before the Examination increasingly suggests that: • the battery component may never secure a deliverable connection pathway; • the battery would operate substantially independently from the solar installation for large parts of the year; and • the claimed relationship between the solar and battery elements is materially weaker in practice than presented within the Application. This issue is fundamental because the Applicant repeatedly relies on the combined operation of the solar farm and Battery Energy Storage System (BESS) to support claims regarding: • energy security; • intermittency mitigation; • flexibility; • decarbonisation; and • wider public benefit.	The Applicant disagrees with this statement. The Scheme comprises a co-located solar and BESS, with the BESS' primary function being to store electricity generated by the solar PV modules at times of low demand and releasing that electricity at times of peak demand. Any additional role in importing excess electricity from the grid and providing grid-balancing services is supplementary to that core co-located storage function. This is set out at paragraph 2.4.19 of the Planning Statement [APP-031]: <i>"Installing a BESS alongside the solar array directly mitigates curtailment and strengthens grid stability and reliability. Instead of being shut off during periods of surplus generation, the solar farm's excess output can be stored on-site and released later when demand rises or when network capacity is available. This ensures that renewable energy which would otherwise be wasted is put to use, maximising the clean power contribution of the project and improving overall system efficiency."</i> The Applicant's statement of need for the Scheme (including the BESS) in Section 2 of the Planning Statement [APP-031] is not dependent on the BESS having an 'import' connection. The statement of need makes it clear that the BESS would be of benefit by capturing solar energy when it is abundant and dispatching it during peak demand or lower renewable periods, thereby improving system resilience and energy security. The public benefits identified at Section 5 of the Planning Statement [APP-031] are not dependent on the BESS providing grid balancing services through an import connection, and therefore not affected by the BESS receiving a 'Gate 1' offer. The planning

Our Ref.	CP Comments	Applicant Response
		balance set out by the Applicant in Section 8 of the Planning Statement [APP-031] is also not dependent on the BESS providing grid balancing services through an import connection. NPS EN-1 and EN-3 are supportive of solar that is co-located with other functions including BESS, recognising that storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.
CP-D3-02	The Applicant continues to rely on the proposition that East Park Energy is an integrated hybrid development, yet NGET's evidence to the Examination expressly confirms that its present infrastructure design work relates only to the solar generating station. The battery component remains at Gate 1 status and is therefore not presently regarded as connection-ready. The significance of that uncertainty is reinforced by the recent Department for Energy Security and Net Zero and Ofgem open letter* concerning battery oversupply and Connections Reform. The letter expressly acknowledges that only some Gate 1 battery projects are expected to progress toward Gate 2 and that: • "some projects will likely leave the queue". DESNZ and Ofgem further stress the need to ensure that: • "non-viable projects leave the queue before the network companies have committed significant capital expenditure". The implication is clear: Gate 1 status does not provide any assurance that a battery project will ultimately proceed to connection or implementation.	The Applicant disagrees with this statement. The Gate 1 position relates to the BESS's separate ability to import electricity from the grid for wider grid-balancing services. It does not determine whether the BESS can be consented, constructed, charged from the Scheme's solar generation, or used to export stored solar electricity under the Scheme's solar generation connection offer. ES Vol 1 Chapter 2 [APP-038] is clear that the Scheme allows the generation and export of 400 MW of electricity from the solar generating station, with the BESS designed to be capable of exporting and importing up to 100 MW. Accordingly, the absence of a Gate 2 import offer for the BESS at this point in time does not make the BESS or solar development undeliverable. At most, it relates to the timing and extent of the BESS's ability to provide separate grid import and balancing services. The BESS remains viable as temporary storage for the Scheme's solar generation, with stored solar electricity capable of being exported through the Gate 2 solar generation connection offer. The Applicant remains hopeful that the BESS component will be able to provide additional grid balancing services through an

Our Ref.	CP Comments	Applicant Response
	Accordingly, the Applicant's continued presentation of the development as a deliverable integrated hybrid scheme is difficult to reconcile with the evidence presently before the Examination.	import connection in the future, but reiterates that the viability of the Scheme is not dependent on this.
CP-D3-03	The Representation included detailed insolation modelling and accompanying output graphs for a proxy 400MW solar installation using actual 2024 and 2025 regional data. Those graphs demonstrated extremely pronounced seasonal variability, with exceptionally low output during quarters 1 and 4 ; in other words, materially depressed generation across prolonged autumn and winter periods. The evidence presented showed regional annual capacity factors of approximately 9.88% for 2024 and 11.09% for 2025, the latter being the sunniest year on record. The Representation specifically questioned how the Applicant's claimed first-year generation estimate – equivalent to a 12.4% capacity factor – could realistically be characterised by the Applicant as "conservative" when compared against actual recent regional performance. The inclusion of 2025 particularly highlights the overly optimistic nature of the Applicant's estimate; this record-breaking year delivered a regional capacity factor more than 10% lower than the Applicant's projected capacity factor for its first year of operation. The Applicant's response does not substantively engage with this evidence.	The Applicant's calculated capacity factor is considered suitable and allows for factors such as solar irradiance, current and emerging panel technology, and overplanting to maximise generation (as set out in paragraph 5.6.6 of the Design Approach Document [APP-034]). Solar technology has developed rapidly over the course of the past decade, and therefore analysing capacity factors based on installed panel technology that predominantly relates to solar farms installed prior to 2020 does not necessarily reflect the capacity factors of more efficient panels now available and expected for this Scheme. In July 2025, the Department of Energy Security and Net Zero published <i>Renewable Energy Generation Cost and Technical Assumptions – Onshore Wind and Solar PV</i> which identifies (in Tables 4 and 39) that in 2023-2024 a range of 11.5% to 14.5% was the typical capacity factor (or 'net load factor') for solar. The Applicant is confident in the capacity factor that has been used for their technical modelling, and that this presents a realistic calculation, based on the specific parameters of this Scheme, including for overplanting.
CP-D3-04	The seasonal evidence set out in my Representation goes directly to the practical operational relationship between the solar installation and the battery component. During prolonged low-output autumn and winter periods, the BESS would necessarily become increasingly dependent on imported grid	The Applicant disagrees that this creates any 'tension' within the Applicant's case. As set out in the rows above, the BESS' primary function is to store electricity generated by the solar PV modules at times of low demand and releasing that electricity at times of peak demand.

Our Ref.	CP Comments	Applicant Response
	electricity rather than on-site solar generation in order to operate at scale. Yet the Applicant simultaneously seeks to: • rely on the battery as part of the integrated renewable energy and energy security case for the scheme; while • downplaying or avoiding substantive discussion of the battery's likely commercial role as a grid-connected trading asset importing and exporting electricity according to market conditions. This creates a significant tension within the Applicant's case.	
CP-D3-05	The Applicant therefore seeks to rely on the battery component when asserting public benefits, while simultaneously avoiding substantive examination of how the battery is likely to operate in practice. That position becomes particularly problematic given that: • the battery may never ultimately secure a deliverable connection pathway at all; • NGET is not presently progressing battery connection design work; • solar output during autumn and winter periods is demonstrated by the submitted regional modelling to be extremely limited; and • the battery's practical operation during those periods would likely depend substantially on imported grid electricity, from a variety of sources, rather than co-located renewable generation.	For the reasons set out in the rows above, the Applicant disagrees that the BESS is relied upon to assert public benefits.
CP-D3-06	Taken together, the evidence increasingly suggests that the Examination is not presently considering a clearly deliverable integrated hybrid renewable energy scheme in the form described by the Applicant. Rather, the evidence points toward: • a solar generating station with highly seasonal and materially constrained autumn and winter output; and	For the reasons set out in the rows above, the Applicant disagrees with this statement.

Our Ref.	CP Comments	Applicant Response
	• a separate battery component whose connection status, operational role, practical integration with the solar installation and ultimate deliverability all remain uncertain. That distinction is fundamental to the planning balance because the Applicant repeatedly relies on the claimed integrated operation of the solar and battery elements in support of assertions regarding energy security, decarbonisation and system flexibility. If the battery component may never obtain connection approval, and if its practical operation would in any event become increasingly detached from on-site solar generation during prolonged low output periods, then the coherence of the Applicant's claimed hybrid renewable energy case is fundamentally weakened	

2.5 Response to Christopher Lacey

Table 7: Response to Christopher Lacey Comments on D2 Submissions (REP3-093)

Our Ref.	CL Comments	Applicant Response
CL-D3-01	The applicants comment that ‘This section notes that if the Secretary of State grants development consent for the Scheme, then, as is common in privately funded infrastructure projects, Brockwell Energy would seek further funding with the support of its legal and financial advisors. Brockwell Energy would consult with a variety of financial institutions and its investors to enable the construction, operation and decommissioning of the proposed development. It also notes that while a final decision has not yet been taken on the type of finance that will be used, this approach is tried and tested in the market and Brockwell Energy has no concerns that it would be unable to obtain finance for the construction, operation and decommissioning of the proposed development’. On the contrary it is clear from reviewing the latest accounts for BSSL Cambsbed 1 Limited and the other companies above it within the group structure of parent company Lantern Holdco Limited that there is insufficient financial strength to enable BSSL Cambsbed 1 Limited to fund the construction, operation, maintenance and ultimately to decommission and restore the scheme land back to food producing farmland without very substantial long term external funding. Whilst Lantern Holdco Limited's shareholders may have substantial financial resources that is academic as without legally binding guarantees they have no legal or financial obligations beyond their equity interests in that group of companies. Adequate funding or the likelihood of it should be demonstrated before granting a DCO is considered and not left as a post DCO requirement.	The Applicant's position remains as stated in its Response to Stop East Park Energy [REP2-45]. It is crucial to understand that this is an application for a development consent order under the Planning Act 2008 for a nationally significant infrastructure project and the extent of what is a material planning consideration weighing in the consideration of this application. The extent to which the Applicant is required to demonstrate funding is set out in the Applications: Prescribed forms and Procedure) Regulations 2009 (the “APFP Regulations”) read in conjunction with the Department for Communities and Local Government (now known as the Ministry of Housing, Communities and Local Government) guidance entitled ‘Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land’ (the “Guidance”). Under Regulation 5(2)(h) of the APFP Regulations, the Applicant is required to submit a funding statement because the DCO, if made, would authorise the compulsory acquisition of land and rights in land. Under the Guidance, applicants should be able to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of. This is confirmed in the Applicant's Funding Statement [REP3-015].

Our Ref.	CL Comments	Applicant Response
	The applicant's response to the written representations made by SEPE in deficiency 7A does nothing to mitigate concerns regarding the likelihood of them funding of this scheme.	A Funding Statement must demonstrate the estimated project cost, funding sources and a confirmation that the Applicant would be able to meet the costs relating to the delivery of the Scheme and any compensation liability arising from the exercise of compulsory acquisition powers. The Applicant's Funding Statement [REP3-015] addresses all of these issues.
CL-D3-02	A material concern for a potential long-term funder is that there is no longer term certainty of tax or billpayer support for UK large scale ground mounted PV Solar continuing beyond the next general election. This risk combined with serious concerns over UK food security resulting from developing these large-scale ground mounted PV Solar schemes on BMV Farmland coupled with the inefficiency of UK solar with a capacity factor of 8-12 % could render these schemes no longer viable. With this background the likelihood of obtaining external funding for this scheme is severely reduced	The Applicant's position is that the issues noted in this representation are not material planning considerations relevant in the context of an application for a development consent order.

2.6 Response to Fred Wood

Table 8: Response to Fred Wood Comments on D2 Submissions (REP3-095)

Our Ref.	FW Comments	Applicant Response
FW-D3-01	I am concerned that insufficient consideration has been given to the extent and value of the Roman settlement to the area of Great Staughton and not enough time or money has been earmarked to access the site and discover further the historical significance of the site.	The Applicant has assessed the impact of the Scheme on the newly discovered Roman town at Great Staughton, which has been designated as a scheduled monument, recognising its national value. The Applicant has prepared an outline Heritage Enhancement Strategy [REP3-066] which sets out actions that will be taken to further historical research and understanding of the Roman town should the Scheme be consented.
FW-D3-02	The size of the overall projects is on an industrial scale and little consideration has been given at this stage as to the social impact of the development goes ahead, the area is not of outstanding natural beauty but it is a rural district within Cambridgeshire county and much of the community is dedicated to sustaining the countryside and keeping it in order for future generations.	The Applicant has assessed the landscape and visual impacts of the Scheme within ES Vol 1 Chapter 5 [APP-041] , and socio-economic effects are assessed within ES Vol 1 Chapter 14 [APP-050] .
FW-D3-03	The economics of the installation have not been fully explained, estimated costs of Installation, the preventive maintenance costs, the dispersal of income, the derisory size of charitable local funding, and then the demolition costs at end of life, will there be land reinstatement costs and who will be responsible for those costs at the termination of the project, this project is being hastened through the system for its purported benefits to energy security, have those benefits been analysed and scrutinised to their fullest extent.	The extent to which the Applicant is required to demonstrate funding is set out in the Applications: Prescribed forms and Procedure) Regulations 2009 (the "APFP Regulations") read in conjunction with the Department for Communities and Local Government (now known as the Ministry of Housing, Communities and Local Government) guidance entitled 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land' (the "Guidance"). Under Regulation 5(2)(h) of the APFP Regulations, the Applicant is required to submit a funding statement because the DCO, if

Our Ref.	FW Comments	Applicant Response
		made, would authorise the compulsory acquisition of land and rights in land. Under the Guidance, applicants should be able to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of. This is confirmed in the Applicant's Funding Statement [REP3-015]. A Funding Statement must demonstrate the estimated project cost, funding sources and a confirmation that the Applicant would be able to meet the costs relating to the delivery of the Scheme and any compensation liability arising from the exercise of compulsory acquisition powers. The Applicant's Funding Statement [REP3-015] addresses all of these issues. The Applicant's Planning Statement [APP-031] sets out the benefits and need for the Scheme against national and local policy and how the Scheme would directly contribute to national decarbonisation and meeting net zero targets (in line with the statutory requirements) through a supply of clean renewable energy, replacing existing fossil fuel generation in the grid. The Scheme is fully aligned with the net zero strategy and can make a valuable contribution towards decarbonising the energy sector before the critical 2030 deadline for a predominantly clean electricity supply. The Applicant has committed to providing a Community Benefit Fund of £400 per MW per year. This is expected to amount to approximately £6.4 million, over the 40-year life of the solar farm. It is anticipated that the Community Benefit Fund will be delivered in partnership with an independent third-party

Our Ref.	FW Comments	Applicant Response
		organisation that has expertise in the management of community funds. Whilst the Community Benefit Fund will provide local benefits, it cannot and should not be taken into account within the planning balance.
FW-D3-04	Can the planning consent be restricted to only installation of solar panels , and a codasyl inserted that no housing applications can be made on this site at termination by the land being referred to as grey , rather than green belt.	The application is for a solar development, and not for housing. The Applicant notes that the Site is not currently designated as green belt, and therefore would not be considered grey belt under any circumstance at decommissioning. Upon decommissioning, the land would not have the characteristics of brownfield or previously developed land.

2.7 Response to Leslie James Rant

Table 9: Response to Leslie James Rant Comments on D2 Submissions (REP3-098)

Our Ref.	LJR Comments	Applicant Response
LJR-D3-01	Regarding the above document, I note that the applicant has responded directly to only one of the issues that I raised, namely the applicants assertion that the proposed site should be within 15Km of the substation. Their response appears to be that the decision was entirely down to the profitability of the project. If profitability is so important to the applicant, why have they chosen a site with large north facing areas?	The Applicant is selectively responding to matters raised by interested parties in order to avoid repetition where possible. As set out with reference to LR-WR-01 in the Applicant Response to Written Representations [REP2-044], there is no statutory or policy requirement to set an area of search based on a specific radius, it is a matter of judgement for the Applicant to decide in relation to the commercial feasibility of the development. The Applicant considers that the area of search was reasonable and proportionate. North-facing slopes are not inefficient to develop when gradients are relatively shallow. There is no specific slope gradient parameter that a developer considers unsuitable, but generally speaking, gradients shallower than an average 5% are preferred as any layout changes or loss of yield are negligible. None of the areas covered by Work No 1 (as shown on the Works Plan [APP-009]) have an average gradient of more than 5%, and therefore any loss of yield based on a standard layout is considered negligible.

2.8 Response to North Bedfordshire Ramblers

Table 10: Response to North Bedfordshire Ramblers Comments on D2 Submissions (REP3-099)

Our Ref.	NBR Comments	Applicant Response
NBR-D3-01	Following my objection on behalf of North Beds Ramblers, I have yet to receive a direct response. Furthermore, there was no justification given for the lack of response I do not consider that the points I raised have been addressed in the following documents; APP-121 - the masterplan REP1-042 - the outline PROW mgmt plan REP1-055 - applicants response to RRs REP2-044 - applicants response to WRs I believe a direct response is required rather than being part of a thematic response. I reiterate that I am still objecting most strongly to this proposed development.	To avoid excessive repetition the Applicant is not responding to every representation made during the examination, instead making use of thematic responses where necessary to provide a response or additional information for the benefit of the examination. This approach was agreed by the Examining Authority during the Preliminary Meeting with a record contained under Item 5 in the Preliminary Meeting Note [EV4-003]. The Applicant has reconsidered the points raised by the North Bedfordshire Ramblers [RR-942] and considers the matters are adequately addressed in the Applicant Response to Relevant Representations – Thematic Responses [REP1-056].

2.9 Response to Peter C Blades

Table 11: Response to Peter C Blades Comments on D2 Submissions (REP3-101)

Our Ref.	PCB Comments	Applicant Response
PCB-D3-01	The practical consequence is that the entity making commitments to the Examination, and to the UK public, is a thinly capitalised UK SPV whose ability to deliver on those commitments is entirely contingent on the continued financial support and strategic intent of a parent structure that has made no enforceable commitments to UK regulators.	The Applicant notes the comments made in this representation but strongly disagrees with them. The use of an SPV for the purposes of undertaking solar development in the UK is a well-established mechanism that does not undermine the commitments made by the Applicant. The draft DCO [EN010141/DR/3.1/P06] and outline management plans contain the necessary safeguards that ensure that the commitments made by the Applicant will be legally secured in the event that the authorised development is implemented. This is fundamentally how the planning system operates and how Planning Act 2008 formulates the delivery of nationally significant infrastructure projects. As previously explained by the Applicant in its submissions and at hearings, the terms of the DCO must be complied with as it is a criminal offence under section 161 of the Planning Act 2008 to fail to do so. In respect of the assertion that the Applicant is entirely contingent on the continued financial support of a parent structure, the Applicant would refer Mr Blades to the Applicant's Funding Statement [REP3-015], which provides a clear explanation of how the authorised development is proposed to be funded.

Our Ref.	PCB Comments	Applicant Response
PCB-D3-02	The risks created by this structure are not evenly distributed across the 40-year project lifecycle. They concentrate at two specific points of maximum vulnerability: At project end (decommissioning): The legal obligation to decommission, remove infrastructure, and restore land to agricultural use falls on the UK SPV. That SPV will, at Year 40, have no revenue stream, no operational raison d'etre, and will be subject to whatever instruction its parent chooses to issue. If the parent has by that point been acquired, refinanced, wound up, or relocated, the UK SPV's ability to fund decommissioning is entirely dependent on the adequacy of whatever financial security instrument has been placed with the authority — an instrument that was already contested during the examination. At points of economic stress (early or mid-life): If subsidy regimes change, energy prices shift materially, or the parent's financial covenants are triggered, the parent structure can execute a strategic withdrawal from the UK operation in ways that leave the local SPV without funding but with all the legal obligations. The UK local authority cannot reach through the corporate veil to enforce obligations on the parent.	The Applicant does not wish to repeat its previous submissions in full, but notes that the draft DCO [REP3-009] and the outline Decommissioning Environmental Management Plan [REP3-054] secure decommissioning and restoration in a clear and enforceable manner, which is consistent with established practice on solar DCOs. The approach taken by the Applicant is also consistent with and well supported by policy. In particular, the Applicant has complied with all the following requirements of NPS EN-3: • Paragraph 2.10.146 on decommissioning, requires an Applicant to put forward outline plans for decommissioning; • Paragraph 2.10.147 provides that where the consent for a solar farm is to be time-limited, there should be a requirement in the DCO setting that time-limit from the date the solar farm starts to generate electricity; and • Paragraph 2.10.149 provides that the requirements should secure the actual decommissioning itself. It is also well-established that policy does not require a decommissioning bond or financial security for solar development as a matter of principle. This position was notably upheld by the Secretary of State in the decision on The Oaklands Farm Solar Park Order 2025, where the Secretary of State omitted the recommendation to include a decommissioning fund requirement. In doing so, the Secretary of State held that <i>"there is no policy requirement for a decommissioning fund to be imposed"</i>, that <i>"the Secretary of State does not consider that imposing a decommissioning fund requirement is necessary"</i> and further that this approach <i>"is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in</i>

Our Ref.	PCB Comments	Applicant Response
		<i>paragraph 4.1.16 of NPS EN 1 that only relevant requirements should be imposed."</i> This was also recently confirmed by the Secretary of State in its decision to grant the Springwell Solar Farm Order 2026. Here, the Secretary of State agreed with the position predated in Oaklands Solar DCO and declined to include a requirement for a bond for a decommissioning fund within the DCO. This confirms that sufficient reliance and weight should be given to the controls available within the planning regime (notably the existence of offences for breach) which are sufficient protection to prevent abandonment of works. If there were a need for the Scheme to be decommissioned early this would be carried out in accordance with Requirement 18, which is triggered when any part of the solar farm works and grid connection works are to be decommissioned, regardless of whether or not the 40 year lifespan of the development has been reached. The Applicant would also refer again to its Funding Statement [REP3-015], which provides a clear explanation of how the authorised development is proposed to be funded.
PCB-D3-03	Bedford Borough Council's Local Impact Report (para 23.5) explicitly identifies the pervasive use of permissive rather than obligatory language throughout the applicant's control documents. This is not an isolated drafting infelicity. It represents a coherent, and presumably deliberate, approach to framing commitments in terms that resist enforcement. The distinction between "could" and "shall" in a planning control document is not semantic. A condition framed as an obligation can be	The Applicant has considered the comments made by Bedford Borough Council and has previously responded to these in its Response to Local Impact Reports [REP2-043]. In this document the Applicant clarified that the Applicant considers the commitments made in the framework of outline management plan documents to be appropriate for this stage of the project and consistent with the proposed mitigation measures included in the ES and requirements within the draft DCO [REP3-009].

Our Ref.	PCB Comments	Applicant Response
	enforced; a condition framed as a possibility cannot. The difference is the entire architecture of public accountability.	A degree of flexibility is inevitably required in outline documents to cover different eventualities at the detailed design stage once a contractor is appointed. The host authorities, in consultation with key stakeholders, will be required to approve the various final management plans prior to different phases of works commencing on site, and the Applicant considers that this provides suitable and sufficient control for the host authorities to agree the final wording of the management plans before impacts could occur. It is these final management plans that will need to be implemented under the draft DCO. The Applicant remains actively engaged with the host authorities regarding the content of the outline management plans.
PCB-D3-04	The 24-month pre-application engagement period resulted in significant areas of ongoing disagreement rather than convergence. This is not unusual for a project of this scale, but the specific character of the disagreements is significant. The major unresolved issues — DCO Agreement structure, financial security, decommissioning obligations, heritage assessment, and language of control — are not technical details amenable to further data submission. They reflect fundamental differences about the governance and accountability architecture of the project. The Rothamsted agrisolar research partnership and the removal of solar arrays near the Scheduled Monument represent genuine positive outcomes of pre-application engagement. These should be acknowledged. However, they represent marginal adjustments to a project whose structural framework remained contested throughout.	The Applicant does not accept that the existence of unresolved matters following pre-application engagement indicates any deficiency in the Scheme's governance or accountability framework. For a project of this scale, it is expected that some matters will remain for examination, and the Planning Act 2008 process is specifically designed to test those matters transparently. The Applicant has continued to engage constructively with stakeholders and has made substantive refinements where appropriate or necessary.
PCB-D3-05	The temporary/permanent paradox identified in the LIR (paras 23.9-10) is directly relevant here: a 40-year occupation of BMV agricultural land is, for practical purposes, a generational removal of that land from	The Applicant does not accept that there is a "temporary/permanent paradox". The assessment has treated the operational effects of the Scheme by reference to its

Our Ref.	PCB Comments	Applicant Response
	food production. The planning benefits cannot be assessed as permanent while the land occupation is treated as temporary.	proposed 40-year operational life, while also recognising that the use is reversible and that the land would be restored following decommissioning. The occupation of land for a defined operational period is not the same as permanent and irreversible loss, particularly where decommissioning and restoration are secured through the draft DCO. The planning benefits of the Scheme, including renewable electricity generation and carbon reduction, would accrue during the same operational period. The decision-maker can therefore properly weigh both the duration of land occupation and the temporary, reversible nature of the development. Paragraph 2.10.66 of NPS EN-3 acknowledges that where a time-limited consent is granted then the development can properly be described as temporary.
PCB-D3-06	The WMS explicitly requires planning authorities to consider cumulative impacts where multiple solar proposals come forward in the same area. The three counties affected by East Park are also experiencing significant development pressure from other large-scale solar proposals. The examining authority should require an explicit assessment of cumulative agricultural land take in the sub-region. Solar Energy UK's argument that even a fivefold increase in solar capacity would have "minimal" impact on food security is not credible as a site-specific defence. The relevant question is not national aggregate impact but localised agricultural land loss and the contribution of any individual large-scale project to that loss	The Applicant has assessed the cumulative effects of the Scheme with other development in ES Vol 1 Chapter 17 [APP-053]. The Applicant does not agree that the WMS requires a separate sub-regional cumulative agricultural land-take assessment.
PCB-D3-07	The World Bank's Global Solar Atlas ranks the United Kingdom 229th out of 230 countries for solar power potential. This is not a marginal difference from European comparators, it reflects fundamental climatic realities: the UK's northerly latitude, its position in the North Atlantic	National policy proceeds on the clear basis that solar PV is an established, effective and necessary technology in the UK's energy mix, with Government identifying solar as a key part of

Our Ref.	PCB Comments	Applicant Response
	weather system, persistent cloud cover, and the extreme seasonal variation in both day-length and solar angle.	the Clean Power 2030 mission and recognising large-scale solar as viable in the UK context.
PCB-D3-08	The examining authority should require the applicant to demonstrate, quantitatively, why alternative deployment on rooftops, brownfield land, contaminated land, and lower-grade agricultural land in the same region is insufficient to meet the identified energy need. The NPS EN-3 requirement to prefer brownfield and lower-quality land is not a preference to be noted and set aside — it is a policy requirement to be demonstrated as either met or shown to be unachievable.	NPS EN-3 states at paragraph 2.10.31 that “<i>Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land</i>”. This is what the Applicant has transparently done as part of the Site Identification Report [APP-058]. A clear sequential approach was followed to rule out brownfield or previously developed land and demonstrate that agricultural land was necessary to meet the project objectives; and that once it was established that agricultural land was necessary, development was directed towards areas of land where best and most versatile land was less likely to occur — thus, poorer quality land was demonstrably preferred by the Applicant, whilst taking into account other factors (set out in NPS EN-3) which influence site selection. The Applicant does not consider that rooftop construction provides a practicable or reasonable alternative for the delivery of a 400 MW solar scheme connecting into the Eaton Socon Substation.
PCB-D3-09	The government's energy security argument for large-scale solar does not withstand scrutiny when applied to a site of this climatic productivity profile. 39.6MW average output from a 400MW installation is equivalent to a capacity factor that, in any other infrastructure investment context, would render the project unviable without subsidy. The implicit public subsidy embedded in planning consent — the occupation of BMV agricultural land for 40 years at opportunity cost to food production — is not accounted for in the applicant's case. If it were, the energy yield per unit of agricultural land occupied would	National policy proceeds on the clear basis that solar PV is an established, effective and necessary technology in the UK's energy mix, with Government identifying solar as a key part of the Clean Power 2030 mission and recognising large-scale solar as viable in the UK context. The Scheme is commercially viable and proposed without public subsidy. Planning consent is not a public subsidy, nor does national policy require an applicant to demonstrate that a solar scheme on BMV land is superior to all alternative deployment options on an energy-per-hectare basis. The Applicant has

Our Ref.	PCB Comments	Applicant Response
	need to be demonstrated as materially superior to alternative deployment options. No such demonstration has been made	assessed the effects of the Scheme including on agricultural land as part of the application.
PCB-D3-10	In the planning balance for a Nationally Significant Infrastructure Project, the presumption in favour of development is a starting point, not a conclusion. The applicant bears the burden of demonstrating that the benefits of the development outweigh the identified harms, and that the identified risks can be managed through robust and enforceable conditions. This applicant has not discharged that burden. The DCO Agreement is rejected by all three Host Authorities. The commitment language is permissive. The submission quality is materially inadequate. The corporate structure provides no reliable enforcement reach. The agricultural land impacts are unmitigated in the meaningful sense. The productivity case is structurally weak. Each of these findings, individually, represents a material gap in the applicant's case. Collectively, they represent its absence	The Applicant recognises that the National Policy Statements require the decision-maker to consider both the benefits and the adverse effects of a proposal, and that national need does not remove the requirement to avoid, reduce and mitigate harm where possible. In developing the Scheme, the Applicant has applied the mitigation hierarchy from the outset. This is set out within topic-specific ES chapters, and summarised for each subsection within Section 7 of the Planning Statement [APP-031]. The Applicant disagrees that the language used through the application lacks necessary commitment, or that the submission quality is inadequate, or that the corporate structure provides no reliable enforcement reach, or agricultural land impacts are unmitigated, or that the productivity case is 'structurally weak'. The planning balance is ultimately a matter for the Secretary of State, with the Applicant's case set out in Section 8 of the Planning Statement [APP-031].
PCB-D3-11	If the examining authority is inclined to recommend consent, the minimum conditions that would need to be satisfied to address the systemic risks identified in this submission are: 8. Full restructuring of the DCO Agreement to the satisfaction of all three Host Authorities, with all obligations in mandatory rather than permissive terms 9. Transparent disclosure of the parent corporate structure, ultimate beneficial ownership, and inter company financial arrangements, with independent verification of adequacy	The Applicant acknowledges these comments and has addressed each in turn below. <u>PCB-D1-11.8</u> The Applicant would firstly like to clarify that a DCO is not an 'agreement', but is instead a statutory instrument that, if development consent is granted, will be made by the Secretary of State under section 114(1) of the Planning Act 2008. The Applicant is actively engaging in discussions with the three Host Authorities regarding the form of the draft DCO [REP3-009] and it is considered that good progress is being made towards

Our Ref.	PCB Comments	Applicant Response
	10. A fully funded, independently held decommissioning bond equivalent to independently assessed full decommissioning cost, with step-in rights for the Host Authorities 11. A standalone Replacement Phase Environmental Impact Assessment 12. Independent third-party compliance monitoring, funded through the DCO, with enforcement powers 13. Full Agricultural Land Classification survey with explicit assessment of BMV land affected, and demonstration that alternatives on lower-grade or brownfield land have been genuinely exhausted 14. Resolution of BESS safety and firewater containment issues to the satisfaction of the relevant fire authority 15. Resolution of the Grade I heritage impact, including removal of relevant panel fields if necessary 16. Completion of the full archaeological assessment programme prior to consent	resolving their remaining concerns whilst ensuring that any amendments are proportionate and reasonable. In response to the specific concern raised, the Applicant disagrees that the draft DCO uses permissive rather than mandatory wording, as all of the requirements contained at Schedule 2 of the draft DCO are expressed in mandatory terms. The draft DCO was informed by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities guidance document “<i>Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects</i>” (April 2024), <i>The National Archives Statutory Instrument Practice 5th edition</i> (November 2017), and Planning Inspectorate guidance document “<i>Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders</i>” (updated March 2025). The mechanisms included in the draft DCO to secure compliance and ensure the appropriate delivery of the Scheme draw on the Model Provisions and a significant number of consented DCOs where appropriate. If the concern relates to the wording used in the outline management plans then this is addressed in the Applicant’s response to PCB-D3-03 above. It is therefore the Applicant position that a full restructuring and drafting of the DCO is not appropriate nor necessary. <u>PCB-D1-11.9</u> The Applicant has addressed this in Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055], in response to question SEPE-RR-08. The extent to which the Applicant is required to demonstrate funding is set out in the Infrastructure Planning (Applications: Prescribed forms and

Our Ref.	PCB Comments	Applicant Response
		Procedure) Regulations 2009 (the “APFP Regulations”) read in conjunction with the Department for Communities and Local Government (now known as the Ministry of Housing, Communities and Local Government) guidance entitled ‘<i>Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land</i>’ (September 2023) (the “Guidance”). A Funding Statement must demonstrate the estimated project cost, funding sources and confirmation that the Applicant would be able to meet the costs relating to the delivery of the Scheme and any compensation liability arising from the exercise of compulsory acquisition powers. It is the Applicant’s position that it is not a requirement of the APFP Regulations or the Guidance for an applicant to provide the wider corporate disclosure, beneficial ownership information, inter-company financial arrangements or independent verification. The Applicant’s Funding Statement [REP3-015] addresses the matters that are required to be demonstrated under the relevant statutory and guidance framework. <u>PCB-D1-11.10</u> The Applicant maintains for all the reasons outlined in its previous submissions, including its response to PCB-D3-02 above and the Applicant Response to Stop East Park Energy [REP2-045], that policy does not require a decommissioning bond or financial security for solar development as a matter of principle and that decommissioning liabilities are appropriately secured in the draft DCO through Requirement 18 and associated control documents in a clear and enforceable manner, which is both consistent with established practice on solar DCOs and the Secretary of State’s position on this issue. <u>PCB-D3-11.11</u>

Our Ref.	PCB Comments	Applicant Response
		The Applicant has provided a Technical Note on Replacement Works [REP3-075] at Deadline 3 to provide clarity on the nature of any replacement works. <u>PCB-D3-11.12</u> The Applicant's position is that this request is already secured through the draft DCO. In particular, each of the requirements contained at Schedule 2 of the draft DCO [REP3-009] must be discharged by the relevant local planning authorities (in consultation with various statutory bodies and other relevant consultees where specified). The host authorities will fulfil the role of an independent third-party who, as is common in all DCOs, will have responsibility for monitoring compliance with the DCO and carrying out enforcement action in the event of non-compliance. The Applicant notes that there has been a recent material change in relevant legislation that enables the host authorities to recover costs incurred in providing services in relation to NSIPs, including funding for the post-decision stage and implementation of the consent. Government has recently amended the Infrastructure Planning (Fees) Regulations 2024 and that as of the 8th June 2026, host local authorities for NSIPs now have a statutory route to recover all reasonable costs incurred in relation to NSIP applications. The guidance can be viewed here: https://www.gov.uk/guidance/planning-act-2008-infrastructure-planning-fees-regulations-2010-cost-recovery-by-the-planning-inspectorate-and-public-authorities The guidance states that:

Our Ref.	PCB Comments	Applicant Response
		<i>“Cost recovery through the charging of fees enables specified public authorities to recover the costs of providing their services in relation to NSIP applications/proposed applications and is designed to resource public bodies so they can provide reliable, high-quality advice on the Pre-application, Acceptance, Pre-examination, Examination, Decision, and <u>Post-decision/implementation stages</u> of NSIP applications/proposed applications.” [emphasis added]</i> For the post-decision and implementation stage the guidance states that the following services can be charged for: <i>“Services provided to the applicant, the Secretary of State or any other person (for example, the Local Planning Authority), after the decision is made by the Secretary of State or in relation to implementation of the decision, <u>such as the discharge of requirements</u>.” [emphasis added]</i> The Applicant considers that the host authorities will be able to recover all reasonable costs in accordance with a charging schedule that must be prepared by the host authorities and published by them transparently setting out the relevant services for which they are charging. On this basis the Applicant considers that the draft DCO does not require amendment. <u>PCB-D3-11.13</u> The Applicant has undertaken an agricultural land classification survey which is presented as ES Vol 2 Appendix 13-1 [APP-115] supporting ES Vol 1 Chapter 13 [APP-049]. There is a commitment to undertake further agricultural land surveys prior to construction as set out within the outline Soil Management Plan [REP3-060]. A consideration of alternatives is set out in the Site Identification Report [APP-058] with additional explanation provided in the response to ‘Procedural Deficiency

Our Ref.	PCB Comments	Applicant Response
		4A' in Table 3 of the Applicant Response to Stop East Park Energy [REP2-045]. <u>PCB-D3-11.14</u> The Applicant has a signed Statement of Common Ground with Cambridgeshire Fire and Rescue Service [PDA-019]. <u>PCB-D3-11.15</u> The Applicant has assessed the potential setting impacts on Grade I listed buildings within ES Vol 2 Appendix 6-4 [REP1-022]. Historic England has provided comments to which the Applicant has responded in Table 3 of the Applicant Response to Written Representations [REP2-044]. <u>PCB-D3-11.16</u> The Applicant has committed to the further archaeological investigation within the outline Archaeological Mitigation Strategy [REP2-034].

2.10 Response to Phil Wayles

Table 12: Response to Phil Wayles Comments on D2 Submissions (REP3-102)

Our Ref.	PW Ref.	PW Comments	Applicant Response
PW-D3-01	PW-WR-01	Noted, although it is still a major concern that Zone B has the largest BMV% of the three alternatives.	The Applicant transparently set out its justification for selecting Zone B within the Site Identification Report [APP-058] .
PW-D3-02	PW-WR-02	The response misses the point that these important factors were not used in the appraisal of the 3 Zones in Section 6.0 of the Site Identification Report. Furthermore, the spatial constraints did not form part of the actual appraisal of the 3 Zones, nor do they consider the necessary level of detail to undertake a robust assessment for the 3 Zones. For example, the Designated heritage sites constraint does not consider scheduled monuments, Grade 1 listed building etc. The important matter of traffic and transport was not considered in this assessment. I still maintain the assessment of alternative sites may have resulted in a different outcome if all these factors had been considered.	As set out at paragraphs 5.1.1 to 5.1.2 of the Site Identification Report [APP-058]: <i>“Stage 3 of the SIR has involved the mapping of planning, environmental and other spatial constraints which have been identified through a desk-based review of the area’s context.</i> <i>The purpose of this stage is to try and identify broad areas of land that are less constrained, and therefore likely to be less environmentally sensitive. Planning and environmental constraints have been reviewed within the Area of Search where they are of a spatial extent large enough to influence site selection. In this regard, smaller features such as listed buildings or scheduled monuments have not been considered owing to their very small scale in the context of the Area of Search.”</i> The assessment of the search zones was based on the ‘Factors influencing site selection’ for solar development set out in Section 2.10 of NPS EN-3 (with additional reference to ES Vol 2 Appendix 3-6 [APP-063]). This included a high level appraisal of traffic and transport under the ‘Accessibility’ factor. The Applicant disagrees that an alternative outcome would have been found, and the justification for selecting Zone B is transparently set out within the Site Identification Report [APP-058].

Our Ref.	PW Ref.	PW Comments	Applicant Response
PW-D3-03	PW-WR-03	The response still does not address the issue that the assessment of reasonable alternatives for the Point of Connection and associated appraisal of the Search Zones should have occurred before the substation connection application was made. It is NSIP best practice to undertake a robust and transparent assessment of all reasonable and plausible alternatives solutions. There is no evidence presented in the application that a Point of Connection to the Little Barford power station/substation was not a viable alternative for this project.	The Applicant disagrees that a connection to the Little Barford Power Station is a reasonable alternative that should have been considered. As set out previously, the point of connection is with the Eaton Socon Substation which had capacity to accept a connection. Such an approach was considered by the Secretary of State on the consented Gate Burton Energy Park NSIP – on that case, at paragraph 3.2.77 of the Examining Authority's Recommendation Report the ExA concluded that it is not an unreasonable starting point for an Applicant to take the agreed point of connection with the grid as a basis for considering alternatives.
PW-D3-04	PW-WR-04	My original comment was made to highlight the recent UKPN scheme demonstrated there were no technical barriers to providing a connection to Zone C, which was the main constraint in the qualitative appraisal of Search Zones in the Site Identification Report. Costs/commercial viability did not form part of this appraisal.	The Applicant maintains its response with reference to PW-WR-04 in the Applicant Response to Written Representations [REP2-044].
PW-D3-05	PW-WR-05	It would be helpful if the Applicant could set out the timeline for EPE construction, the Gate 2 connection process and how this aligned with the work required for the expansion, rebuild or provision of a new substation at Eaton Socon. I note the BESS status is Gate 1 and does not have a guaranteed connection.	The indicative construction programme is set out in Section 2.5 of ES Vol 1 Chapter 2 [REP3-023] supported by ES Vol 2 Appendix 2-1 [APP-055]. The ES explains that, subject to the Scheme securing development consent in winter 2026/27, construction is anticipated to commence in early 2028 and to last approximately 30 months, with completion by mid to late 2030. The ES identifies construction of the East Park Substation as occurring indicatively during months 2 to 12 and construction of the 400 kV grid connection as occurring indicatively during months 3 to 10, including works associated with the connection at Eaton Socon Substation and testing and commissioning.

Our Ref.	PW Ref.	PW Comments	Applicant Response
			Following the Gate 2 connection process, the Applicant has received a connection offer for the Scheme with a connection date of October 2028 and an October 2030 backstop. The Applicant's construction programme has therefore been developed on the basis that the Scheme can be connected from October 2028, with the remaining construction and commissioning activities continuing within the overall programme assessed in the ES. The Applicant understands that works may be required at Eaton Socon Substation to accommodate the Scheme and other projects, and that those works may involve upgrade, expansion, rebuild or other works to the existing substation infrastructure. Those wider works are matters for National Grid/NESO through the grid connection and network design process and are outside the Applicant's direct control. The Applicant remains in regular dialogue with National Grid, but the precise scope and timing for those works have not yet been confirmed to the Applicant. The Applicant has assumed that the necessary works at Eaton Socon Substation would be completed to enable connection from October 2028, consistent with the connection offer.
PW-D3-06	PW-WR-07	The lack of precedent on other solar farms (let alone for the soils in this area) remains a concern as does which company will actually be responsible to manage / do this work following decommissioning. No response was provided as to why the NFU have not been consulted nor submitted representations on the important matter of BMV and food security versus construction of so many solar farms in the area.	The National Farmers Union is not a prescribed statutory consultee for the purposes of section 42 of the Planning Act 2008 or Schedule 1 to the APFP Regulations 2009. Consultation with the NFU is therefore not a statutory pre-application requirement. The NFU has had the opportunity to register as an Interested Party to the examination but appears to have elected not to do so.
PW-D3-07	PW-WR-08	Noted, although I wasn't clear this approach had been agreed with National Highways (and CCC?) because NH	The Applicant is continuing to consult with both National Highways and Cambridgeshire County Council.

Our Ref.	PW Ref.	PW Comments	Applicant Response
		often require more detailed modelling junctions on the Strategic Road Network, for example on the local A428 Black Cat to Caxton Gibbet scheme (where CCC also requested modelling of some LA junctions) I am also surprised that NH and CCC have not requested traffic modelling to be undertaken for the junctions to the north and south of the A1/B645 junction where U turn manoeuvres are required. These include the A1 Buckden Junction, A1 Little Paxton Junction, Black Cat Junction and A428 Wyboston Roundabout.	The Applicant has a fully agreed position with National Highways, as set out in the Statement of Common Ground with National Highways [as updated alongside this submission] which accompanies this Deadline 4 submission.
PW-D3-08	PW-WR-10	Response is noted, but details about location of the access points and satellite compound were not shown on the display boards and so were not clear to those attending the consultation events or who are unfamiliar with the PEIR documents. Proposed access SA09 currently has very limited usage and is shared with the well-used FP4 for approximately 150m. The level of effect and significance on the key receptor viewpoint for FP4 was assessed as “Major Adverse / (Significant)” in ES Chapter 5 Landscape and Visual 5.10 - Effects on representative viewpoints during construction. As one of many local residents who use this footpath frequently, I would ask the Inspector to consider recommending an alternative route to access this satellite compound via an amended internal haul road network.	The proposed management measures for Footpath 4 are set out in Section 6.13 of the outline Public Rights of Way Management Plan [REP3-058]. The Applicant has set out how access during the construction phase would be safely managed, and does not consider that an alternative route is necessary.
PW-D3-09	PW-WR-11	The response misses the point that significant numbers of additional HGV traffic movements will cause damage to the many local roads that are already damaged or in poor	The Applicant refers to Section 5.9 of the outline Construction Traffic Management Plan (oCTMP) [REP3-050] which clearly sets out the Applicant’s commitment to undertaking pre- and

Our Ref.	PW Ref.	PW Comments	Applicant Response
		condition and which are unsuitable for large volumes of heavy construction vehicles. Proof of which is the need to widen some roads on access routes and near site access points. Also, the suspension proposed (and so CCC's response) related to the B645 between the A1 and main compound site entrance. HGV construction movements are required along/across other sections of the local roads and will cause further damage – not just during construction but also during the operational replacement work and decommissioning phase	post-construction highway condition surveys, as well as regular interim monitoring during the construction phase, in conjunction with the Local Highway Authorities, in order to identify and remediate any defects resulting from construction traffic. These measures will also be carried through to management plans dealing with the management of large volumes of development traffic that may result from major replacement campaigns and during the decommissioning phase (as set out in para 2.4.10 of the outline Operational Management Plan [REP3-052] and para 2.5.1 of the outline Decommissioning Management Plan [REP3-054]).
PW-D3-10	PW-WR-12	I am unsure how the Applicant can guarantee “The required visibility splays would not involve the removal of any hedgerows, but could involve annual pruning of hedgerows should foliage grow out to obstruct visibility” because the outline design for the accesses and crossings and associated visibility splays are based on lines on the OS base plans rather than an accurate topographical survey data. These plans do not accurately show the location, width or height of the adjacent edges I still contend it is very likely that longer lengths of hedgerow need to be removed and/or trimmed to provide the necessary visibility in accordance with DMRB standards.	The Applicant disagrees based on site surveys that have been undertaken, accurate geo-referenced aerial imagery, and on the visibility splay drawings presented at Appendix D of the oCTMP [REP3-050].
PW-D3-11	PW-WR-13	My point here related to the significant overall cumulative impact of the existing and proposed solar farms in the rural landscape. It is acknowledged the landscape and visual cumulative effects of these solar farms are assessed in ES Chapter 5. However, the Applicant confirms in Section 5.11.9 “The Scheme would result in an	As set out previously, the Applicant has assessed the likely significant cumulative effects of the Scheme within ES Vol 1 Chapter 17 [APP-053].

Our Ref.	PW Ref.	PW Comments	Applicant Response
		increased concentration of solar development in this part of the Southern Wolds LCA..... At Year 0, the cumulative level of effect would be Moderate Adverse, which is judged to be Not Significant.” This describes the assessed effects from a theoretical desktop study, versus the reality of the large number and vast extent of farmland and countryside covered with the existing and proposed solar farms as shown graphically below on the plan taken from the Stop East Park Energy website.	

2.11 Response to Sara Collar

Table 13: Response to Sara Collar Comments on D2 Submissions (REP3-103)

Our Ref.	SC Comments	Applicant Response
SC-D3-01	Speaking as a local resident, I remain concerned that the Applicant's Traffic and Transport plans pay insufficient attention to the distinctly rural nature of the roads that both construction traffic and construction workers will use, both on the designated routes and on the routes which will necessarily be used if the designated routes are blocked or unavailable. Both drive through videos submitted to the ExA demonstrate clearly that there are no street lights along the proposed or alternative routes and that the majority of the roads lack footpaths or suitable verges on which horse-riders, cyclists or pedestrians can take refuge. Indeed in many cases, the verges are often bordered by steep ditches which may contain significant quantities of water at times of excess rain or flooding. The ExA's site visit will support this.	The Applicant notes this comment. It should be reiterated that the proposed construction traffic access strategy has been designed specifically to minimise the use of the local rural highway network, as evidenced by the proposed construction of internal haul routes through the Site. Where it is necessary to use short sections of the public highway, mitigation measures in the form of localised widening have been proposed as necessary. It should also be noted that the only permissible use of any alternative access routes would be as part of an authorised diversion route put in place by the police / National Highways / Local Highway Authorities in the event of road closures.
SC-D3-02	With construction worker vehicle movements predicted to be at their highest preceding 08:00 and following 18:00, together with construction work which will begin at 08:00 and continue until 17:00, there will be significant vehicle movements during winter time when the roads are dark or visibility is limited. Are these routes suitable for the volume of traffic predicted? And what mitigations are being put in place to protect the safety of road users and in particular, the safety of more vulnerable road-users, such as motorcyclists, horse-riders, cyclists, pedestrians or bus passengers (including school children using school buses) who often need to wait on the roadside and/or walk along the road to reach their homes? The scheme also allows for several places where construction traffic will cross existing roads and no details have been provided of how these crossing points will be managed, particularly when it is dark or visibility is limited. At these crossing points, similar hazards will exist and is adequate provision	The assessments undertaken in ES Vol 1 Chapter 9 Traffic and Transport [REP3-027], ES Vol 2 Appendix 9-1 Transport Assessment [REP3-042] and the Technical Note on Impact on B645-A1 St Neots Junction [REP1-066] clearly identify to the satisfaction of the relevant local highway authorities and National Highways that the proposed construction traffic access route is suitable to accommodate the forecast volumes of construction traffic. The proposed construction traffic access route has been designed to avoid routing construction traffic through local villages. As set out in the section 6.3 of the oCTMP [REP3-050], where the construction access route crosses the public highway, the proposed crossing points would be controlled.

Our Ref.	SC Comments	Applicant Response
	being made to ensure that ALL road users, not just vehicle drivers, will be able to safely use these crossing points?	
SC-D3-03	And finally have our local highway authorities taken into account the cost and effort required to maintain these rural roads, many of have no formal kerbing to protect road edges or verges. How will the inevitable increase in road maintenance be funded and more importantly managed at times when the roads need to be resurfaced or repaired, creating further restrictions upon vehicle movements which will need to be planned and managed.	Section 5.9 of the outline Construction Traffic Management Plan (oCTMP) [REP3-050] sets out the Applicant's commitment to undertaking pre- and post-construction highway condition surveys, as well as regular interim monitoring during the construction phase, in conjunction with the Local Highway Authorities, in order to identify and remediate any defects resulting from construction traffic.

2.12 Response to Stop East Park Energy

Table 14: Response to Stop East Park Energy Response to ExQ1 / D2 Submissions (REP3-108)

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-01	2.1 Uncertainty over grid connection and BESS viability	The NGET WR confirms that with only a “Gate 1 offer for the battery connection”, the BESS element of the scheme does not currently feature in its plans for the Eaton Socon Substation Project. The NGET WR additionally establishes that there are caveats associated with the “solar farm” component of the scheme: “The East Park Project is reliant on the construction and operation of the Eaton Socon Substation Project in order to connect into the National Grid and therefore NGET requires absolute control over the land around the Eaton Socon substation as well as other land in close proximity to the Eaton Socon substation in order to facilitate the Eaton Socon Substation Project and the East Park Project’s connection. The Eaton Socon Substation Project is critical infrastructure to enable the connection of multiple projects at this location, with the East Park Project being only one of a number of projects referred to on the National Energy System Operator Transmission Entry Capacity (TEC) register as requiring a future connection to the Eaton Socon substation, including for Clearstone Energy Limited’s and Telis Energy’s projects.”	The Applicant confirms that it has received a Gate 2 offer for the 400 MW solar generation export connection, and a Gate 1 offer for the 100 MW BESS import connection. Information in respect of the Applicant’s connection offer is publicly available at NESO’s TEC Register. This lists all projects, both existing and future, that hold contracts with NESO for Transmission Entry Capacity (i.e. projects which have secured capacity to export to the transmission network). The Applicant is in regular dialogue with National Grid, however National Grid has not yet been able to confirm the scope and exact timeline for the proposed works required to the Eaton Socon Substation. The date of connection committed in the Connection Offer received by the Applicant is October 2028. Therefore, the expectation is that the upgrade of the existing substation would be completed by this point. However, the Applicant is not in a position to confirm this. The confirmed connection date and the commitment to be connected is the only certainty the Applicant currently has on this matter. The fact that National Grid may need to undertake wider reinforcement, expansion or optimisation works at the Eaton Socon Substation is not unusual for a nationally significant infrastructure project, and does not mean the Scheme lacks a defined or deliverable connection. Such matters are properly managed through the grid connection process and National Grid’s detailed design work. They do not alter the Applicant’s
	2.1 Uncertainty over grid	The uncertainty surrounding the proposed East Park BESS is further reinforced by the April 2026 open letter issued jointly by the Department for Energy Security and	

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	connection and BESS viability	Net Zero (DESNZ) and Ofgem1, which explicitly acknowledges that the current grid connections queue contains what it describes as a “battery surplus” – a substantial oversupply of battery storage projects – and that many schemes may never ultimately secure viable connections or proceed to delivery. As set out in NGET’s Written Representation, the East Park BESS currently holds only Gate 1 status, unlike the solar element which has obtained a Gate 2 offer, meaning the battery component does not presently have a confirmed or deliverable route to connection under the reformed regime. The recent DESNZ/Ofgem letter appears to undermine any assumption that the proposed co-located battery infrastructure can be treated as certain or inevitable.	connection point or undermine the assessment of the authorised development. The Gate 1 in relation to the BESS relates to its separate ability to import electricity from the grid for wider grid-balancing services. It does not determine whether the BESS can be consented, constructed, charged from the Scheme’s solar generation, or used to export stored solar electricity under the Scheme’s solar generation connection offer. ES Vol 1 Chapter 2 [APP-038] is clear that the Scheme allows the generation and export of 400 MW of electricity from the solar generating station, with the BESS designed to be capable of exporting and importing up to 100 MW. The primary function of the BESS is as an integral element of the Scheme, storing electricity generated by the solar PV modules at times of low demand and releasing that electricity at times of peak demand. Its additional role in importing excess electricity from the grid and providing grid-balancing services is supplementary to that core co-located storage function. Accordingly, the absence of a Gate 2 import offer for the BESS at this point in time does not make the BESS or solar development undeliverable. At most, it relates to the timing and extent of the BESS’s ability to provide grid import and balancing services. The BESS remains viable as temporary storage for the Scheme’s solar generation, with stored solar electricity capable of being exported through the Gate 2 solar generation connection offer.
	2.1 Uncertainty over grid connection and BESS viability	In these circumstances, the current connection position introduces uncertainty as to the timing, deliverability and operational role of the BESS component, raising important questions about whether the Scheme can properly be assessed and justified as a single integrated solar and battery NSIP, particularly where the operational characteristics of the development would be materially altered in the absence of the battery component.	
SEPE-D3-02	2.1 Uncertainty over grid connection	1. Does the Applicant still maintain that there are “no uncertainties” in relation to the Scheme’s grid connection arrangements, given the content	1. The Applicant considers there are no uncertainties in its position that it holds a Connection Offer for the project, with an agreed connection date from October 2028. The Gate 1

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	and BESS viability	of NGET's Representation and its identification of the BESS as holding only Gate 1 status? - Given that it appears the BESS currently has no assured progression from Gate 1 to Gate 2, on what basis does the Applicant consider the battery element to be deliverable and viable? - In light of the apparently differing connection status of the solar and BESS elements, on what basis does the Applicant continue to describe the Scheme as a single 'hybrid' or co-located NSIP? - Which elements of the Applicant's need case and claimed benefits depend specifically on delivery of the BESS element? - In the absence of a confirmed and deliverable connection route for the BESS, what weight does the Applicant consider should be attached to the claimed benefits of the battery element?	connection offer for the BESS is, in the Applicant's view, not a material consideration. - The BESS currently has no import connection offer from National Grid, but retains the ability to export electricity under the export connection offer. A co-located BESS therefore remains deliverable and viable. - The Scheme remains a 'hybrid' or co-located NSIP, in that the BESS will support the electricity generation from the Scheme, as set out above with reference to SEPE-D3-01. 4 & 5. As set out with reference to CP-D3-01 in Table 6 of this document, the public benefits identified at Section 5 of the Planning Statement [APP-031] are not dependent on the BESS providing grid balancing services through an import connection, and therefore not affected by the BESS receiving a 'Gate 1' offer. The planning balance set out by the Applicant in Section 8 of the Planning Statement [APP-031] is also not dependent on the BESS providing grid balancing services through an import connection.
SEPE-D3-03	2.2 BESS arbitrage and grid services – including low season solar power operational profile	The Applicant asserts that the BESS will contribute to grid balancing and renewable integration but provides no supporting operational evidence, such as: - an operational model, dispatch logic or cycling strategy; - state-of-charge modelling demonstrating integration with solar generation;	The intended operational model, dispatch logic and cycling regime is not a matter that needs to be considered as part of the planning merits of the approach taken, and nor is it something that the Applicant could accurately quantify or define in any meaningful way at this stage. Accordingly, the BESS has been considered as part of the embodied carbon impact in the various phases of the Scheme, as set out in ES Vol 2 Appendix 15-1 Greenhouse Gas Assessment [APP-116], but has not been accounted for in offsetting carbon given that its precise operational usage is at this stage undefined. This provides an appropriate worst-case

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		• identification of specific system-service roles (e.g. frequency response, balancing reserve, inertia or resilience services); • evidence of contractual or operational linkage with National Grid ESO or equivalent system operators; or • confirmation of charging sources and whether grid-charging will occur independently of the solar generation.”	assessment in that whilst the BESS would be expected to deliver additional carbon benefits, they cannot accurately be assessed and so are not accounted for in the benefits.
SEPE-D3-04	2.2 BESS arbitrage and grid services – including low season solar power operational profile	The Applicant’s response to concerns raised regarding the operational role of the proposed BESS appears to rely primarily on broad assertions regarding flexibility, grid balancing and co-location without engaging with the principal evidential concern identified by SEPE: namely, that the operational characteristics and economic rationale of the BESS are likely to extend substantially beyond the storage of surplus on-site solar generation during spring or summer months. SEPE’s concern is that the Examination has not yet been provided with sufficient evidence to understand the extent to which the proposed 100MW BESS would operate as a wider market-trading and grid-services asset importing and exporting electricity independently of the solar facility. This distinction is important because it affects the assessment of need, operational impacts, cycling intensity, safety, component replacement assumptions, traffic associated with maintenance and replacement, and the claimed carbon and system benefits relied on in the planning balance. It also bears directly on whether the BESS should properly be regarded as a fully integrated component of the	Government guidance on associated development under section 115 of the Planning Act 2008 says there must be a direct relationship with the principal development, that associated development should support the construction or operation of the principal development or help address its impacts, and that it must be subordinate to it. NPS EN-1 confirms that associated development may be included in a DCO and that EN-1, together with the relevant technology-specific NPS, is the primary policy for determining it. NPS EN-3 states that solar proposals may include associated infrastructure such as energy storage, which may be treated as associated development on a case-by-case basis. The inclusion of BESS as part of a solar NSIP application is well-precedented, and this Scheme is not an anomaly. The planning regime does not require the BESS to be restricted to charging only from the co-located solar array, or to be restricted from wider grid-balancing services, in order to remain associated development. National policy positively supports solar co-located with storage, and the policy framework treats battery capacity as part of the flexible system needed to store renewable output and balance the grid.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		renewable-energy scheme or as a distinct commercial storage asset.	The Applicant has transparently assessed the likely significant effects that would result from the Scheme, including from the BESS.
SEPE-D3-05	2.2 BESS arbitrage and grid services – including low season solar power operational profile	The Applicant's response does not appear to substantively address the subsequent related points set out in the SEPE WR and reproduced above, other than a brief dismissal: "The planning regime does not require the BESS to be restricted to charging only from the co-located solar array, or to be restricted from wider grid balancing services, in order to remain associated development. National policy positively supports solar co-located with storage, and the policy framework treats battery capacity as part of the flexible system needed to store renewable output and balance the grid." SEPE submits that the concerns and requests it has raised remain highly relevant. They go directly to the function and status of the BESS and how the Applicant justifies its treatment as "associated development", when its operational profile, in relation to key details around storage of imported energy from the grid and the extent of its operational integration with the co-located solar generation across the annual cycle, is not yet transparently established for scrutiny under the Examination.	The Applicant fundamentally disagrees with this point, for the reasons set out in the rows above.
SEPE-D3-06	2.2 BESS arbitrage and grid services – including low season	The commercial viability of large-scale co-located battery systems is inherently dependent on forecasting future operational behaviour and revenue streams. At £73 million, the BESS forms a substantial proportion of the estimated cost to construct the Scheme (nearly	The Applicant's position remains that the matters noted in this representation are not material planning considerations relevant in the context of an application for a development consent order under the Planning Act 2008, and that the inclusion of a BESS as part of a solar NSIP application is well-precedented and in

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	solar power operational profile	20%); is likely to incur significant ongoing component replacement costs; and introduces considerable additional infrastructure, safety and environmental considerations. It is therefore difficult to reconcile the Applicant's claimed inability to provide even broad operational parameters with the level of financial commitment and engineering design evidently underpinning the proposal. The evidence before the Examination strongly indicates that co-located BESS infrastructure is deployed not merely to avoid curtailment of solar generation in higher output months, but to enable wider arbitrage trading and participation in ancillary grid-service markets throughout the year. Such operation necessarily involves import and export activity independent of contemporaneous on-site solar generation, including charging from the wider grid during periods of low pricing and discharging during periods of higher demand and elevated pricing.	compliance with relevant government guidance and national policy statements. In particular, Government guidance on associated development under section 115 of the Planning Act 2008 provides that there must be a direct relationship with the principal development, that associated development should support the construction or operation of the principal development or help address its impacts, and that it must be subordinate to it. NPS EN-1 confirms that associated development may be included in a DCO and that EN-1, together with the relevant technology-specific NPS, is the primary policy for determining it. NPS EN-3 states that solar proposals may include associated infrastructure such as energy storage, which may be treated as associated development on a case-by-case basis The Applicant also maintains that the function and role of the BESS as an integral element of the Scheme has been clearly described in ES Vol 1 Chapter 2 [APP-038]. In particular, paragraph 2.4.41 of ES Vol 1 Chapter 2 [APP-038] is clear that <i>"The BESS will be an integral element of the Scheme, used to store electricity generated by the solar PV modules at times of low demand from the National Grid and release the electricity at times of peak demand"</i> and paragraph 2.4.42 also confirms that <i>"In addition to the BESS' function as an essential part of the Scheme, it will also be available to the National Grid for grid-balancing services"</i>. ES Vol 1 Chapter 2 [APP-038] also confirms that the Scheme allows the generation and export of 400 MW of electricity from the solar generating station, with the BESS designed to be capable of exporting and importing up to 100 MW.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-07	2.2 BESS arbitrage and grid services – including low season solar power operational profile	Recent analysis of large-scale solar and co-located battery systems, conducted by a renewable energy policy academic, indicates that the commercial viability of BESS infrastructure is increasingly dependent on import/export trading and ancillary grid service revenues rather than solely on storing surplus on-site renewable generation. The analysis notes that electricity imported from the grid for later resale “will be from any source on the network, including gas” and that import capability is essential to access these wider revenue streams. In practical terms, particularly during autumn and winter months when solar output is low, the BESS may therefore operate extensively using electricity imported from the wider grid rather than contemporaneous on-site solar generation. This is directly relevant to the Applicant’s description of the Scheme as clean-energy infrastructure, because the electricity subsequently discharged and exported by the BESS would not necessarily constitute renewable generation originating from the co-located solar arrays. Regional and local evidence presented in the SEPE WR supports this conclusion: it includes data showing the extreme seasonal variation in regional insolation over the past two years, alongside capacity factors recorded at a local solar power site that remained consistently below the national average during its first two years of operation (SEPE WR; Appendix F – Solar generation performance and indicative system contribution evidence, and section 5 of this submission).	The Applicant notes that the BESS presently has a Gate 1 offer and no confirmed import connection. It should therefore currently be assumed that the BESS will not import any electricity from the grid. As set out above, this does not affect the need case for the Scheme, or the claimed Scheme benefits.
SEPE-D3-08	2.2 BESS arbitrage and grid services	While SEPE recognises that the Shepway NSIP is a separate scheme with a different solar-to-storage ratio, SEPE notes that during recent engagement between	The Applicant cannot comment on the proposed approach to be taken by another developer on another project. As set out above, the BESS presently has a Gate 1 offer and no confirmed import

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	– including low season solar power operational profile	SSE Renewables and local community representatives regarding the proposed Shepway Energy Park in Kent, it was apparently indicated that the proposed BESS would not be connected to the project's co-located, multi-site solar arrays, reportedly because the solar generation alone would not produce sufficient surplus electricity to make dedicated storage commercially worthwhile, but would instead operate as a grid-balancing and import/export asset. The example appears consistent with the wider commercial and operational trends discussed in the SEPE WR and above, namely that large-scale co-located BESS infrastructure may derive substantial operational value from wider arbitrage and ancillary grid-service functions rather than primarily from storing surplus on-site solar output. This reality is directly relevant to the Applicant's description of the BESS as merely "associated development ... subordinate" to the principal solar generating station. The greater the extent to which the BESS may derive value from year-round trading, balancing and wider network services rather than direct solar storage, the more important it becomes that the Examination understands the anticipated operational profile of the battery element in its own right.	connection. It should therefore currently be assumed that the BESS will not import any electricity from the grid. As also set out above, this does not affect the need case for the Scheme, or the claimed Scheme benefits. NPS EN-3 states that solar proposals may include associated infrastructure such as energy storage, which may be treated as associated development on a case-by-case basis. The inclusion of BESS as part of a solar NSIP application is well-precedented, and this Scheme is not an anomaly.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-09	2.2 BESS arbitrage and grid services – including low season solar power operational profile	SEPE does not suggest that precise future trading behaviour can be predicted with certainty over the lifetime of the development. However, it seems entirely reasonable for the Examination to expect the Applicant to provide evidence-led assumptions regarding likely charging patterns, seasonal operation, cycling intensity and the anticipated balance between solar-storage activity and wider grid-service operation. These matters are material to the assessment of environmental effects, safety considerations, replacement cycles, carbon performance and the overall planning balance. In the absence of that information, SEPE maintains that the Examination is presently being asked to assess a substantial battery storage development without a sufficiently transparent explanation of how it is realistically expected to operate over its operational lifetime.	The Applicant notes that the BESS presently has a Gate 1 offer and no confirmed import connection. It should therefore currently be assumed that the BESS will not import any electricity from the grid. As set out above, this does not affect the need case for the Scheme, or the claimed Scheme benefits. The intended operational model, dispatch logic and cycling regime is not a matter that needs to be considered as part of the planning merits of the approach taken, and nor is it something that the Applicant could accurately quantify or define in any meaningful way at this stage. The Applicant has transparently assessed the likely significant effects that would result from the Scheme, including from the BESS.
SEPE-D3-10	2.2 BESS arbitrage and grid services – including low season solar power operational profile	1. During periods of low or negligible on-site solar generation, particularly in autumn and winter months, what proportion of the BESS's anticipated operational activity does the Applicant expect will involve charging directly from the wider electricity grid rather than from co-located solar generation? 2. What evidence-based assumptions has the Applicant used in its financial modelling regarding the anticipated proportion of BESS revenue derived from wholesale electricity arbitrage and ancillary grid-service markets, as	1 & 2. The BESS has no confirmed import connection, and therefore the BESS will only operate as part of the co-located solar generation. 3. The Applicant has been able to provide a reasonable and proportionate assessment of the likely significant effects that could occur as a result of the BESS based on best practice taken from professional experience.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		distinct from the storage and export of on-site solar generation? 3. The Applicant's position is that it cannot "accurately quantify or define in any meaningful way at this stage" future operational behaviour. How has the Applicant assessed likely annual cycling intensity, degradation rates, replacement intervals and associated maintenance activity for the BESS over the operational lifetime of the Scheme?	
SEPE-D3-11	2.3 Battery safety	SEPE notes that, while the Applicant's oBSMP references many relevant safety topics and future assessment processes, substantial elements of the detailed BESS safety case remain dependent on future studies, testing, consultation and post consent approvals. These include matters such as: • large-scale fire testing; • detailed plume analysis; • hazard mitigation analysis; • FMEA/HAZOP/DSEAR assessments; • detailed suppression system design; • emergency response planning; and • final agreement with Cambridgeshire Fire and Rescue Service.	The oBSMP [APP-162] establishes the safety principles, assessment framework and mitigation requirements for the BESS. The detailed studies identified by SEPE necessarily depend upon the final battery technology, supplier, layout and fire protection systems selected through detailed design. Those assessments will therefore be undertaken, where applicable, at the appropriate design stage and their findings incorporated into, or provided in support of, the final BSMP. The final BSMP is secured through the draft DCO and will be prepared in consultation with Cambridgeshire Fire and Rescue Service.
SEPE-D3-12	2.3 Battery safety	SEPE further notes that the Applicant's own BESS Fire Emissions Modelling appendix identifies that the detailed Emergency Response Plan will be developed at detailed	The reliance on supplier-specific test data at detailed design stage does not indicate that the safety case is deficient, but instead it ensures that the final emergency procedures are

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		design stage and will incorporate procedures and actions based on future thermal runaway test data supplied by the eventual BESS system provider. SEPE does not suggest that such staged development is inappropriate in principle, nor that all technical detail must necessarily be fixed at application stage. However, SEPE submits that this illustrates the extent to which certain operational safety assumptions and emergency response measures remain dependent on future technology selection, provider-specific testing and post-consent detailed design development.	tailored to the battery technology, equipment and protection systems actually installed.
SEPE-D3-13	2.3 Battery safety	SEPE further notes that the Host Authorities' own LIR responses identified limitations in specialist in-house expertise in certain technical areas and reliance on the Examination process itself to test aspects of the Applicant's evidence base. In that context, SEPE notes that a number of additional Requirement provisions and operational controls proposed by SEPE have been characterised by the Applicant as "unnecessary", notwithstanding that equivalent detailed provisions do not presently appear to be fixed within either the dDCO Requirements or the current oBSMP drafting.	The Applicant does not agree that the Host Authorities' identification of limitations in their in-house expertise demonstrates any deficiency in the Applicant's evidence or in the controls secured through the draft DCO. The Host Authorities have consented other BESS facilities in their respective areas through the TCPA process without issues of in-house expertise. The purpose of the Examination is to enable the ExA, Host Authorities and other Interested Parties to scrutinise the application evidence, seek clarification and, where necessary, obtain specialist advice. The Applicant has considered each of SEPE's suggested provisions and where a proposal has been described as unnecessary, this reflects the Applicant's view that it would duplicate existing controls, prescribe matters more appropriately determined through detailed design, or impose requirements that are not justified by the assessed risks.
SEPE-D3-14	2.3 Battery safety	Battery safety experts are concerned that lithium iron phosphate (LFP) batteries, which are suggested by some scheme promoters to be safer because higher	The Applicant does not dispute that LFP batteries are not risk-free. However, LFP chemistry generally has greater thermal stability than other common lithium-ion chemistries, reducing, but

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		temperatures are typically required before thermal runaway occurs, can still undergo thermal runaway under certain failure conditions. They may also present explosion hazards associated with electrolyte vapour clouds and can emit fluorinated compounds during fires.	not eliminating, the probability of thermal runaway. LFP is not a novel or unproven battery chemistry and is widely deployed in electric vehicles and grid-scale energy storage. The oBSMP [APP-162] adopts a hazard-based approach under which the final system will be subject to technology-specific testing, risk assessment and appropriate prevention, detection, containment and emergency-response measures.
SEPE-D3-15	2.3 Battery safety	1. Which specific provisions within the Applicant's submitted oBSMP are said to provide equivalent control and enforceability to the Requirement wording proposed by SEPE? 2. Does the Applicant accept that substantial aspects of the detailed BESS safety case remain subject to future assessment, testing, consultation and post consent approval? 3. How does the Applicant consider that substantial post-consent technical submissions and approvals relating to the detailed BESS safety case would be independently scrutinised and validated in practice, particularly where Host Authorities have already identified limitations in specialist in-house expertise and reliance on the Examination process to test certain technical matters? 4. Would the Applicant's current drafting of the dDCO and oBSMP permit materially different BESS technologies, layouts or operational strategies to be implemented post-consent from those assessed within the Environmental Statement?	1. The Applicant does not rely upon the oBSMP in isolation as the enforcement mechanism. Requirement 10 prevents the commencement of Work No. 2 until a final BSMP has been approved by the relevant planning authority, following consultation with Cambridgeshire Fire and Rescue Service and the Environment Agency. The final BSMP must be in substantial accordance with the oBSMP and must thereafter be implemented and maintained throughout the Scheme's lifetime. Requirement 3 separately controls the detailed BESS design and prevents the approval of changes that would give rise to materially new or materially different environmental effects. The substantive matters sought by SEPE are already addressed through, among other provisions, sections 2.2 and 2.4 of the oBSMP [APP-162] concerning UL 9540A testing, LSFT, equipment separation and containment of failure to a single enclosure; sections 2.6 and 2.7 concerning detection, suppression, ventilation and explosion protection; sections 4.3 and 4.5 concerning firefighting water and contaminated-water containment; and sections 4.4 and 5.1 concerning emergency planning, hazard analysis and independent specialist validation. 2. The Applicant does not accept that substantial elements of the safety case remain unresolved in a manner that prevents consent. It is necessary that detailed design and supplier-specific

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		5. Which minimum BESS safety and operational parameters are intended to remain fixed regardless of future detailed design evolution?	information will inform the final BSMP. The oBSMP [APP-162] identifies the relevant hazards, safety objectives, applicable standards, minimum performance outcomes and evidence that the selected system must provide. 3. The premise that post-consent scrutiny would depend solely upon the Host Authorities' in-house expertise is incorrect. The oBSMP expressly requires specialist independent validation at several stages. UL 9540A and large-scale fire testing must be undertaken through recognised testing regimes; the HMA must be undertaken by a BESS-specialist independent Fire Protection Engineer; and the fire protection, explosion protection, spacing, consequence-modelling and firefighting-water evidence must also be reviewed by an independent Fire Protection Engineer. The resulting evidence will inform the final BSMP submitted for approval, with CFRS and the Environment Agency consulted through Requirement 10. The Host Authorities have consented other BESS facilities in their respective areas through the TCPA process without issues of in-house expertise. 4. The draft DCO [REP3-009] permits appropriate detailed-design flexibility, but it does not permit materially different environmental effects. The final BESS may use a different supplier, chemistry, enclosure configuration or protection system from the concept design, provided that it remains within Work No. 2 and the approved design envelope, complies with the final BSMP and satisfies the minimum safety outcomes established by the oBSMP. Requirement 3 of the draft DCO further prevents any design departure that would produce materially new or materially different environmental effects from those reported in the ES.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			5. The location of the BESS is fixed by Work No. 2 as shown on the Works Plan [APP-009] with the design parameters set out at Table 2 of the Design Parameters and Principles Statement [REP1-030]. In addition the framework of control measures are secured by Requirement 10 of the draft DCO and the requirement to prepare a final BSMP in substantial accordance with the oBSMP [APP-162], to include (but not limited to) successful UL 9540A and large-scale fire testing; demonstration that failure and equipment loss will be limited to one enclosure without direct firefighter intervention; independent specialist validation; non-stacking of BESS enclosures; local and remote emergency shutdown; 24-hour monitoring; tested explosion-prevention, ventilation and pressure-relief systems; safe emergency access; and a detailed Emergency Response Plan.
SEPE-D3-16	2.3(i) High-pressure gas pipeline	While the Applicant has provided evidence that an oil pipeline crossing the proposed site is redundant, SEPE has so far been unable to locate similar evidence within the application materials demonstrating that the gas pipeline also has 'redundant' status.	The gas pipelines which cross East Park Site B, the corridor between Site B and C, and East Park Site D are not redundant. They are operational assets managed by National Gas Transmission (NGT) that the Applicant is aware of and has designed around. The Applicant is in the process of agreeing protective provisions with NGT for inclusion within the draft DCO. The pipelines are indicated on ES Vol 3 Figure 2-3 [REP1-029].
SEPE-D3-17	2.3(i) High-pressure gas pipeline	Can the Applicant indicate where evidence can be found to show the status of the high-pressure gas pipeline in close proximity to the BESS compound in site D?	As above, the gas pipeline which crosses Site D is an active pipeline. The design easements that will be applied are set out at paragraph 2.5.44 of ES Vol 1 Chapter 2 [REP2-008] and are also described and secured at Section 2.3 of the outline Landscape and Ecological Management Plan [REP3-056].

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-18	3.1(i) Issues with personal injury accident data	SEPE notes that Image 3.3 'Road Safety Record Along Local Highway Network in Vicinity of Scheme (2020-2025 Inclusive)' in the 'ES Appendix 9-1: Transport Assessment' shows an accident cluster, including a fatal injury accident, at the A1/B645 junction. This figure also shows that a fatal injury accident occurred at/near the B645/Moor Road Junction. However, SEPE notes that these accidents are excluded from the data in Table 3.2 which follows Image 3.3. This misrepresents the recent safety record at these junctions, which is a material matter because: • the A1/645 junction will see a significant increase in traffic volumes for access to and from the main site compound during construction and decommissioning (as set out in the Construction Access Strategy); and • the B645/Moor Road junction will be used during the operation phase for traffic movements to and from Site Access SA13 (as confirmed on Figure 11 in Appendix D of the oCTMP).	The summary of accident data set out in Table 3.2 of ES Vol 2 Appendix 9-1 Transport Assessment [REP3-042] (the TA), covers the highway links on the local highway network which comprise the defined study area for the assessment of potential traffic and transport impacts of the Scheme, as identified in section 3.3 of the TA. A review of all of the accidents shown on Image 3.3 which fall outside of the defined study area is provided in the commentary set out in paragraphs 3.5.7 to 3.5.11 of the TA. This clearly acknowledges that while the occurrence of any fatal accident is regrettable, nevertheless none of the accidents along the proposed construction traffic access route constitute a cluster site as defined by Cambridgeshire County Council. It should also be noted that the number of vehicle movements along the B645 north of the Main Site Access during the operational phase would be extremely low, even during periods of replacement activity, as set out in Section 3.6 of the Technical Note on Replacement Works [REP3-075].
SEPE-D3-19	3.1(i) Issues with personal injury accident data	It goes on to set out personal injury accident data for the period 1 April 2020 to 31 March 2025 inclusive. It does not appear, however, to acknowledge that this date range includes both part of the Covid-19 pandemic period, during which road use patterns were materially affected, and the immediate post-pandemic period, during which Department for Transport data⁴ shows that traffic volumes remained below pre-pandemic levels. SEPE would also suggest that the Applicant's identification of specific times associated with certain recorded accidents, together with references to those	The Applicant would note that in the latest version of the TA [REP3-042] submitted at Deadline 3, the accident history has been updated to cover the most recently available five-year period, which covers the period between 1st March 2021 to 28th February 2026. As such, the majority of the accident analysis period falls outside of periods when Covid-19 travel restrictions were in place. The Applicant would note that commentary noting where accidents occurred outside of the proposed construction hours was provided to add context to the accident analysis. This was

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		times falling outside the proposed construction hours, appears to place undue emphasis on whether certain incidents occurred during proposed construction hours, despite the wider relevance of the accident record to baseline highway safety conditions and network sensitivity.	not used as a reason to exclude accidents from the appraisal of the potential impacts of the Scheme on highway safety.
SEPE-D3-20	3.1(ii) Concerns over plans for haul roads and future traffic impacts	Additionally, SEPE is concerned about the potential adverse safety impact on the B645, Moor Road and Great Staughton Road following removal of the temporary access tracks (haul roads) after construction, as shown in Figure 15 in Appendix C of the oCTMP. This will impact on the operation phase and, more importantly, the decommissioning works.	As noted above in response SEPE-D3-18, the number of vehicle movements along the B645 north of the Main Site Access during the operational phase would be extremely low, even during periods of replacement activity, as set out in Section 3.6 of the Technical Note on Replacement Works [REP3-075]. Section 2.5 of the outline Decommissioning Environmental Management Plan [REP3-054] clearly sets out that access during the decommissioning phase will follow the same principles as in the construction phase, and that the mitigation measures set out in the outline Construction Traffic Management Plan (oCTMP) [REP3-050] would also apply to the decommissioning phase. This would include the re-provision of the temporary internal haul routes during decommissioning.
SEPE-D3-21	3.1(ii) Concerns over plans for haul roads and future traffic impacts	Traffic volumes are projected to grow over the 40-year period, resulting in greater potential for more personal injury accidents. According to Table 6.2 in the Transport Assessment, traffic volumes are anticipated to increase by up to 5% in the period 2022–2028, and growth will continue. Longer-term increases in traffic are also likely to have implications during replacement campaigns and the decommissioning phase at the end of the project's operational life, when additional heavy vehicle	The Applicant notes this comment. However, the number of vehicle movements generated by the Scheme during the operational phase would be extremely low, even during periods of replacement activity, as set out in Section 3.6 of the Technical Note on Replacement Works [REP3-075]. As noted above in response SEPE-D3-19, it is set out within the outline Decommissioning Environmental Management Plan [REP3-054] that access during the decommissioning phase will follow the same principles as in the construction phase, and that the mitigation measures set out in the outline Construction

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		movements and associated road safety impacts may arise.	Traffic Management Plan (oCTMP) [REP3-050] would also apply to the decommissioning phase, including the re-provision of the temporary internal haul routes during decommissioning.
SEPE-D3-22	3.1(iii) Potential omission of cumulative impact and new traffic category	SEPE notes that the Transport Assessment and Cumulative Impacts Assessment do not appear to consider the increased traffic generated for construction works for the expansion, rebuild or provision of a new Eaton Socon substation, nor water tanker movements (see section 4).	There are no known detailed proposals for the expansion, rebuild or provision of a new Eaton Socon substation that the Applicant is able to meaningfully assess.
SEPE-D3-23	3.2 Traffic volumes – transparency and confidence in calculations	SEPE's sample exercise modelling the Scheme's aggregates requirement, set out in the SEPE WR and reproduced above, suggests there may be a material lack of transparency and internal reconciliation within the Applicant's construction traffic assessment. This is potentially significant given the sensitivity and limited capacity of the surrounding rural road network, where even modest underestimation of HGV and other project-related traffic volumes could materially affect routing, junction performance, amenity and highway safety impacts. The issue is also directly relevant to the robustness of the Scheme's wider lifecycle carbon calculations, since traffic movements form an integral component of embedded and transport-related emissions (see section 4).	The Applicant has previously responded on this point within Section 6.0 of the Applicant Response to Stop East Park Energy [REP2-045] .
SEPE-D3-24	3.3 Construction traffic control measures and lifecycle	SEPE notes that a number of the construction traffic controls proposed within its draft Requirements, set out in the SEPE WR, do not presently appear to be expressly secured within either the dDCO Requirements or the current oCTMP drafting, including for example:	The requirement to implement the measures set out within the oCTMP is secured in Requirement 8 of the draft DCO [REP3-009] . This Requirement also clearly sets out that the final CTMP must be approved by the local planning authority in consultation

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	replacement/ maintenance activities	• defined no-go/no-through route restrictions through sensitive villages and constrained rural roads; • enforceable HGV routing controls; • school-hour and peak-hour movement restrictions; • GPS/geofencing or equivalent route compliance mechanisms; • monitoring and compliance reporting provisions; • communications strategy and procedures; • restrictions on construction traffic re-routing during congestion or incidents; and • clear trigger mechanisms for corrective action where non-compliance occurs. SEPE submits that these measures are directly relevant to the Applicant's own assessment assumptions regarding construction traffic impacts and community safety. In particular, SEPE requests clarification as to what specific enforceable mechanism would prevent HGV drivers, subcontractors or delivery vehicles from utilising alternative local routes through surrounding villages or constrained rural roads if those routes are not expressly prohibited and controlled within the approved traffic management framework. This applies to the construction, decommissioning and operation phases. At present, the Applicant's position appears to rely substantially on assumed contractor adherence to management plans rather than clearly secured and independently enforceable controls.	with the relevant local highway authority prior to any construction work commencing.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-25	3.3 Construction traffic control measures and lifecycle replacement/maintenance activities	In particular, there remains limited clarity regarding the likely scale and frequency of substantial replacement activities; the distinction between routine maintenance and large-scale replacement campaigns; the likely duration and intensity of such works; associated HGV movements, crane operations and waste handling requirements; and the cumulative interaction of replacement activities with surrounding receptors, villages and transport corridors.	An appraisal of the likely scale and frequency of replacement activities, including an analysis of the likely traffic impacts, is included within the Technical Note on Replacement Works [REP3-075] .
SEPE-D3-26	3.3 Construction traffic control measures and lifecycle replacement/maintenance activities	1. Can the Applicant explain why personal injury collisions, including fatal incidents, appear to have been omitted from its Transport Assessment, and clarify how the Examining Authority can therefore have confidence that the baseline highway safety assessment fully and accurately reflects conditions along the B645 corridor as well as at the A1/B645 and B645/Moor Road junctions? 2. Given that the Applicant's five-year accident analysis substantially overlaps with the Covid-19 and immediate post-pandemic periods, when traffic patterns and flows were materially atypical, has any sensitivity testing or adjustment been undertaken to determine whether the baseline highway safety assessment may understate likely risks under normalised or future traffic conditions, especially given the projected increases in traffic volumes presented by the Applicant, and growth factors in the National Transport Model? 3. Given SEPE's sample analysis of vehicle movements required for aggregates delivery, can the Applicant provide a transparent construction logistics reconciliation demonstrating how the stated quantities of:	1. The Applicant has responded to this point with reference to SEPE-D3-18 above. 2. The Applicant has responded to this point with reference to SEPE-D3-19 above. 3. The Applicant has responded to this point with reference to SEPE-D3-23 above. 4. Matters identified as "under discussion" with local highway authorities do not relate to the forecast traffic generation of the Scheme. As identified within Bedford Borough Council Comments on responses to RRs [REP2-047] (ref. BBC-RR-100/11.13), and Cambridgeshire County Council Written Representation [REP1-073] (para 11.5), both Bedford Borough Council and Cambridgeshire County Council have acknowledged that they are satisfied that the appraisal of trip generation has followed a robust methodology, and that there are no concerns in respect of the volume of traffic during the construction phase. 5. The Applicant has responded to this point with reference to SEPE-D3-24 above. 6. The Applicant has responded to this point with reference to SEPE-D3-25 above.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		• aggregates • PV modules and frames • cabling and ducting • BESS containers and electrical plant • transformers and substation components • concrete and civils • fencing and security infrastructure • delivery of construction plant/vehicles • fuel for construction plant/vehicles • trees and shrubs • pavement materials for car parks • compound offices and welfare facilities • waste and spoil movements • construction support logistics, and • all other materials, products or equipment associated with the Scheme translate into the headline HGV/LGV movement totals relied on within the Transport Assessment, including all assumptions regarding payloads, vehicle types, delivery sequencing and backhauling? 4. In light of Statements of Common Ground indicating that aspects of the traffic baseline, transport impacts and mitigation measures remain “under discussion” with relevant authorities, what weight should the Examining Authority place on the Applicant’s assertion that the trip	7. The Scheme must be determined on its own environmental assessment and mitigation measures secured through the framework of environmental management plans. The Applicant considers the framework of management plans provide appropriate controls which are robust and enforceable.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		generation forecasts and transport conclusions are already “accepted” and “robust”? 5. What specific enforceable mechanisms, secured through the dDCO Requirements or approved management plans, would prevent HGVs, subcontractors and delivery vehicles from deviating onto unsuitable local roads or through sensitive villages during construction, operation, replacement campaigns and decommissioning activities? 6. Can the Applicant clarify the likely scale, duration, frequency and cumulative traffic implications of substantial operational replacement campaigns, including scenarios involving replacement of up to 20% of Scheme components, and explain the extent to which such activities have been assessed within the Environmental Statement and operational traffic modelling? 7. Having regard to the construction-phase experience of the Cleve Hill Solar Park, what assurance can the Applicant provide that reliance on outline management plans, contractor-led compliance and future mitigation detail would be sufficient to avoid comparable prolonged traffic, amenity and highway safety impacts on the constrained rural road network surrounding the proposed Scheme?	
SEPE-D3-27	4 Lifecycle carbon case	SEPE has undertaken an alternative emissions analysis of a selected range of components/activities associated with the Scheme: BESS cells, PV panels and PV framework. More details and provisional sample	The Applicant has noted SEPE’s alternative emissions analysis and provided a response over the rows below.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response																
		calculations are set out in Appendix A and the headline totals are set out in Table 1. <table><tr><th>Activity</th><th>Emissions (tCO₂e)</th></tr><tr><td>Production (China)</td><td>623,104</td></tr><tr><td>Production – transport</td><td>14,871</td></tr><tr><td>Replacement</td><td>862,395</td></tr><tr><td>Decommissioning – waste</td><td>17,961</td></tr><tr><td>Decommissioning – waste transport</td><td>1,658</td></tr><tr><td>Decommissioning – other</td><td>4,217</td></tr><tr><td>Total</td><td>1,524,206</td></tr></table> Table 1: Alternative calculations for selected sample of GHG emissions associated with the Scheme	Activity	Emissions (tCO ₂ e)	Production (China)	623,104	Production – transport	14,871	Replacement	862,395	Decommissioning – waste	17,961	Decommissioning – waste transport	1,658	Decommissioning – other	4,217	Total	1,524,206	
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SEPE-D3-28	4 Lifecycle carbon case	In its ‘Environmental Statement Volume 2 – Technical Appendices. Appendix 15-1: Greenhouse Gas Emissions Assessment’, the Applicant summarises total GHG emissions over the lifetime of the Scheme as: “As shown, using the conservative assumptions the total emissions over the lifetime of the Scheme are ~666,000 tCO₂e.” This comparison of alternative assessments of GHG emissions associated with a sample range of activities undertaken by SEPE may indicate the potential for lifecycle carbon dioxide emissions to be materially higher than those reflected in the Applicant’s total assessment of activities.	The largest difference between the Applicant’s calculations and SEPE’s calculations appears to be the production emissions and replacement emissions associated with the batteries. <u>Production emissions associated with the batteries</u> The Applicant has reviewed the calculations and has found errors in both the Applicant’s calculations and SEPE’s calculations. As batteries have a peak output of 100 MW and a storage capacity of 400 MWh, the production emissions associated the batteries should be calculated by multiplying the storage capacity (400 MWh) by the emissions factor from Forbes of 89 kgCO₂e / kWh battery = 35,359 tCO₂e. This is four times higher than the value currently stated in ES Vol 2 Appendix 15-1 Greenhouse Gas Emissions Assessment [REP2-021] and ES Vol 1 Chapter 15 Climate Change [REP2-012] as the Applicant had multiplied the peak output (rather than the storage capacity) by the emissions factor from Forbes. The Applicant has amended the calculations in ES Vol 2 Appendix 15-1 [as updated alongside this submission] and ES Vol 1 Chapter 15 [as updated alongside this submission] to reflect this amendment. The amendment increases the total																

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			GHG emissions to 735,000 tCO₂e, but this does not affect the conclusions of the assessment, as outlined in ES Vol 1 Chapter 15 [REP2-012]. The Applicant does not agree with SEPE's calculations for the production of the batteries, as they are four times greater than the amended calculations outlined above. It appears that SEPE has used the installed capacity of the solar farm, rather than the storage capacity of the batteries. <u>Replacement emissions associated with the batteries</u> The Applicant has reviewed SEPE's calculations and notes that SEPE has assumed three battery replacements over the operational lifetime of the Scheme, equating to one replacement every 10 years. Alternatively, the Applicant has assumed one battery replacement over the operational lifetime of the Scheme, equating to one replacement at 20 years. The Applicant has reviewed the literature and has concluded the batteries generally have a service life of 10-20 years and has completed a sensitivity analysis for the batteries having at the lower end of the service life range (i.e. a 10-years). The sensitivity would increase the total GHG emissions to 809,000 tCO₂e, but this would still not affect the conclusions of the assessment as the Scheme would still have a net carbon benefit over its lifetime and would still be fully consistent with existing and emerging policy requirements and fully in line with measures necessary to achieve the UK's trajectory towards net zero. <u>Taking forward SEPE's alternative analysis</u> Although the Applicant disagrees with the production emission calculations within SEPE's alternative analysis, even if SEPE's calculations were taken forward (which are 4 times higher than the Applicant's), the conclusions of ES Vol 1 Chapter 15 Climate Change [REP2-012], would not change as the Scheme

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			would still have a net carbon benefit over its lifetime and would still be fully consistent with existing and emerging policy requirements and fully in line with measures necessary to achieve the UK's trajectory towards net zero.
SEPE-D3-29	4 Lifecycle carbon case	SEPE notes that examination of GHG emissions associated with grid-scale solar power schemes is preceded in the NSIP regime. For example: Cranfield University's assessment of carbon calculations related to the 500MW Sunnica solar power scheme suggested that: "1) Sunnica may have overestimated their energy output at 23.5 TWh, unless they are intending an installed capacity of at least 625 MWp. 2) Sunnica's methodology for calculating GHG (greenhouse gas) emissions throughout the lifecycle stages of the Scheme is not transparent and has led to an underestimation of the lifetime emissions of the scheme." More recently, the promoter of the Great North Road solar NSIP, Elements Green, corrected its carbon calculations three times during the recently concluded Examination6. As an Interested Party, a local community group highlighted mathematical and factual errors, incorrect data, misleading statements, missing materials and unsustainable assumptions in the Applicant's original assessment. The Interested Party's final analysis indicates the project could produce between 1.8	The Applicant acknowledges SEPE's comments regarding precedent within the NSIP regime for scrutiny of GHG emissions associated with solar schemes, including reference to Sunnica and Great North Road. The Applicant recognises that the GHG assessments for NSIP solar schemes vary depending on the scope, assumptions, methodology, data sources and level of design maturity at the time the assessment is undertaken. At the current stage of development, prior to design freeze, where key equipment has not yet been selected, it is difficult to calculate the GHG emissions associated with the Scheme with precision. However, reasonable assumptions have been used which are in line with literature and other projects. The Applicant also notes that NSIP solar schemes, such as the Scheme, are an essential part of delivering the Government's net zero by 2050 ambitions. Progress towards delivering the Government's net zero by 2050 ambition requires action now, especially where proven technologies, such as solar, are available. Additionally, solar energy is significantly more sustainable and secure long-term option than continued reliance on oil and gas which are exposed to geopolitical instability. As set out in section 15.9 "Additional Mitigation and Monitoring" of ES Vol 1 Chapter 15 [REP2-012], one of the key mitigation measures for the Scheme is the development of a lifecycle assessment (LCA) based on the GHG Assessment in ES Vol 2 Appendix 15-1 [REP2-021]. This commitment will maintain

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		million and 2.6 million tonnes more carbon dioxide than it would save over its lifetime.	awareness of lifecycle GHG emissions and support ongoing emissions reduction as the design progresses. The Applicant further notes that GHG accounting practices, emissions factors and underlying datasets continue to evolve. A broader evidence base and improved data sources are now available compared with those that were accessible when the basis of ES Vol 2 Appendix 15-1 [REP2-021] was produced. The commitment to prepare a LCA, as secured through section 15.9 of ES Vol 1 Chapter 15 [REP2-012], will ensure that the most up-to-date methodology and data are used at the appropriate stage of the Scheme's development, as well as maintaining awareness of lifecycle emissions and supporting ongoing emissions reduction as the design progresses.
SEPE-D3-30	4.2 Additional source of carbon emissions and existing accepted errors in Applicant's carbon calculations	Recent BESS explosions and fires further underline the importance of robust construction-phase contingency planning. According to reports, two of the UK BESS fires in early 2025 occurred during construction/commissioning: the fire at Statera Energy's 300MW/600MWh East Tilbury BESS site in Essex; and the fire at Anesco's 49MW/49MWh Rothienorman BESS site in Aberdeenshire. International examples include the 300MW/450MWh Tesla Megapack facility in Victoria, Australia, which caught fire during commissioning in 2021. In circumstances involving a significant construction or commissioning-stage battery fire, reliance on tankered-in water alone may prove insufficient, further reinforcing the need for credible alternative water supply arrangements and associated traffic impacts to be fully assessed.	The scope of the GHG Emissions Assessment has been outlined in Table 15.8 of ES Vol 2 Appendix 15-1 [REP2-021] and this does not include the GHG emissions associated with increased construction traffic in the event of a battery fire. Battery fires are exceedingly rare per MWh installation and therefore; it is not reasonable to account for emissions that not anticipated to happen during the design life of installation. This would only arise during an emergency scenario.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		Increases in construction traffic will inevitably add to the carbon calculation underestimates suggested by SEPE's preliminary sample analysis.	
SEPE-D3-31	4.2 Additional source of carbon emissions and existing accepted errors in Applicant's carbon calculations	Further, SEPE notes that the Applicant has acknowledged at least one error within its carbon calculations following examination-stage scrutiny by Interested Parties. While the identified error may be numerically limited in isolation, its significance lies in the wider question of confidence and verification.	The Applicant can confirm that the errors are isolated incidents which do not change the conclusions of the assessments.
SEPE-D3-32	4.2 Additional source of carbon emissions and existing accepted errors in Applicant's carbon calculations	Where an assessment intended to demonstrate the climate efficiency and public benefit case for a nationally significant infrastructure proposal contains acknowledged calculation errors and has been described by the Applicant as having "limitations", the Examination is entitled to consider whether assumptions, inputs or methodological elements may also require clarification or verification. This is particularly relevant given that: • construction traffic assumptions remain challenged; • construction-phase emissions may therefore be understated; • lifecycle emissions assumptions depend on uncertain replacement and maintenance profiles; and	Regarding limitations to the assessment, the Applicant acknowledges that there will always be some limitations with ES Vol 2 Appendix 15-1 [REP2-021]. At the current stage of development, prior to design freeze, where key equipment has not yet been selected, it is difficult to calculate the GHG emissions associated with the Scheme with precision. However, reasonable assumptions have been used which are in line with literature and other projects. The assessment has been produced to fulfil the requirements of the EIA Regulations using the information available at this stage and appropriate assumptions. The commitment to prepare a LCA will ensure that the most up-to-date methodology and data are used at the appropriate stage of the Scheme's development. This commitment will also maintain awareness of lifecycle GHG emissions and support ongoing emissions reduction as the design progresses.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		operational carbon benefits are themselves linked to uncertain generation assumptions (see section 5).	
SEPE-D3-33	4.2 Additional source of carbon emissions and existing accepted errors in Applicant's carbon calculations	1. The Applicant's assessment relies on assumptions which it describes as "conservative", yet SEPE's partial alternative assessment alone exceeds the Applicant's total whole-scheme figure by a substantial margin. In those circumstances, can the Applicant explain how the Examination can reasonably exclude the possibility that the Scheme's true lifecycle emissions may be materially higher still, and therefore potentially undermine the claimed net climate benefit over the operational lifetime of the development? 2. The Applicant has acknowledged limitations within its assessment and accepted at least one calculation error during the Examination process. In the context of a nationally significant infrastructure proposal where carbon efficiency forms part of the public-interest justification, can the Applicant clarify what independent verification or sensitivity testing has been undertaken to ensure the assessment remains reliable?	Please see response to SEPE-D3-32.
SEPE-D3-34	5 Capacity factors and the Applicant's projected Scheme power generation	On the issue of capacity factors and likely real-world site performance, the Applicant's response to SEPE appears not to have engaged with the substance of SEPE's WR. While the Applicant's response addresses procedural and policy matters, it does not address in any meaningful technical way SEPE's evidence concerning regional insolation data, cited local solar performance, or the credibility of the scheme's projected electricity generation figures.	National policy proceeds on the clear basis that solar PV is an established, effective and necessary technology in the UK's energy mix, with Government identifying solar as a key part of the Clean Power 2030 mission and recognising large-scale solar as viable in the UK context. The Applicant's calculated capacity factor is considered suitable and allows for factors such as solar irradiance, current and emerging panel technology, and overplanting to maximise

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	5 Capacity factors and the Applicant's projected Scheme power generation	As summarised in Table 2, SEPE's regional insolation analysis indicates that the Applicant's projected generation materially exceeds the levels that would have been achieved under both unusually favourable solar conditions experienced in the record 2025 solar year and more typical 2024 regional conditions. In the table, SEPE introduces DESNZ's national capacity factors for 2025 and 2024 which are also materially below the Applicant's generation projection capacity factor. SEPE therefore continues to assert that the Applicant's assumptions may be inherently optimistic, particularly when assessed against long-term regional irradiance conditions rather than exceptional years.	generation (as set out in paragraph 5.6.6 of the Design Approach Document [APP-034]. Solar technology has developed rapidly over the course of the past decade, and therefore analysing capacity factors based on installed panel technology that predominantly relates to solar farms installed prior to 2020 does not necessarily reflect the capacity factors of more efficient panels now available and expected for this Scheme. In July 2025, the Department of Energy Security and Net Zero published <i>Renewable Energy Generation Cost and Technical Assumptions – Onshore Wind and Solar PV</i> which identifies (in Tables 4 and 39) that in 2023-2024 a range of 11.5% to 14.5% was the typical capacity factor (or 'net load factor') for solar. The Applicant is confident in the capacity factor that has been used for their technical modelling, and that this presents a realistic calculation, based on the specific parameters of this Scheme, including for overplanting.
SEPE-D3-35	5 Capacity factors and the Applicant's projected Scheme power generation	In Appendix B, SEPE presents part of the evidence put before the Great North Road solar NSIP Examination. Analysis and comparative data contained within an Interested Party submission ⁷ provides relevant corroborative technical and methodological support for SEPE's concerns regarding the realism of the Applicant's projected generation assumptions and implied capacity factors across comparable solar NSIP schemes. In particular, the submission examines the relationship between PVsyst-derived projections, DESNZ national capacity factors, bifacial panel performance assumptions and observed capacity factors across a range of UK solar projects, while noting that even schemes using bifacial panels and tracking systems may achieve materially lower real-world performance than projected; this is relevant to East Park	The material reproduced in Appendix B of the SEPE submission comprises analysis advanced by an Interested Party in the Great North Road Solar Park Examination. The fact that material has been submitted in another examination does not establish that its methodology or conclusions are correct or transferable to this Scheme. Dividing the Scheme's forecast first-year generation of approximately 433.2 GWh by 400 MW produces a capacity factor figure of approximately 12.4%. However, 400 MW is the Scheme's maximum AC export capacity at the grid connection and is not the indicative installed DC nameplate capacity of the solar PV array. As set out above, paragraph 5.6.6 of the Design Approach Document [APP-034] identifies an indicative installed capacity of approximately 485 MWp, representing approximately 21.3% overplanting. Calculated against that installed DC capacity, the same 433.2 GWh first-year generation estimate

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		given that the Scheme proposes conventional fixed-panel solar arrays rather than tracker technology.	equates to approximately 10.2%. Overplanting is specifically intended to increase generation relative to the 400 MW export limit, including during periods of lower irradiance and as panels degrade, without increasing the maximum permitted export capacity. Overplanting is supported by national policy at paragraph 2.10.55 of NPS EN-3, along with footnote 92. As set out in the response above, the Applicant is confident in the capacity factor that has been used for their technical modelling, and that this presents a realistic calculation, based on the specific parameters of this Scheme, including for overplanting.
SEPE-D3-36	5 Capacity factors and the Applicant's projected Scheme power generation	SEPE notes that caution is required in relation to projected bifacial panel performance assumptions within UK solar NSIP-scale schemes. Evidence submitted during the Great North Road Examination and cited above has highlighted that modelled bifacial gain assumptions may rely on optimistic assumptions regarding albedo, panel spacing, layout efficiency and long-term operating conditions. Typical albedo values for grassed agricultural land are lower than more reflective bare-earth or artificial surfaces. SEPE also notes that the only apparently identified UK field study ⁹ , cited in the evidence referred to above, examined bifacial panel performance at a solar site with an installed capacity of 34.7MW and featuring a "ground surface, covered with thick soil" which "played a vital role in determining the albedo", limiting the extent to which such evidence can confidently be extrapolated to the East Park Scheme's proposed design and operational assumptions. The York study also found that bifacial panels had a marginally higher degradation rate per annum.	The Applicant does not agree with SEPE's suggestion that the Scheme's projected generation is founded on optimistic bifacial performance assumptions. The Applicant has provided comment on its assumed capacity factor in the responses above. The study referenced by SEPE relates to another Scheme and does not demonstrate that the assumptions adopted for the Scheme are unrealistic. The marginally higher degradation recorded for the particular modules studied do not establish a universal degradation rate, and degradation has already been incorporated into the Applicant's assessment.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-37	5 Capacity factors and the Applicant's projected Scheme power generation	Against this evidential background, the Applicant's response does not provide: • revised generation modelling; • explanation of capacity-factor assumptions; • sensitivity testing against lower irradiance years; • comparison with observed regional performance; or • any substantive rebuttal of SEPE's analysis regarding likely operational output. This omission is important because the planning balance advanced by the Applicant relies heavily on asserted public benefits arising from renewable electricity generation and carbon displacement. If projected generation figures may be materially optimistic, then the claimed public benefits may also be overstated. SEPE expressly raised this concern within its proportionality and need case, contending that the Examination had not yet been provided with sufficient evidence to evaluate whether the proposal represents an efficient contribution to national decarbonisation objectives relative to the scale of land-take and environmental harm.	National policy proceeds on the clear basis that solar PV is an established, effective and necessary technology in the UK's energy mix, with Government identifying solar as a key part of the Clean Power 2030 mission and recognising large-scale solar as viable in the UK context. It is established at paragraphs 3.2.6 to 3.2.8 of NPS EN-1 that there is a need for the Scheme, that the need is urgent, and that the Secretary of State should give substantial weight to that need: <i>"The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part. [3.2.6]</i> <i>In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008. [3.2.7]</i> <u><i>The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS."</i></u> [3.2.8] In relation to the Applicant's generation modelling and capacity factor assumptions, as set out in the responses above, the Applicant is confident in the capacity factor that has been used for their technical modelling, and that this presents a realistic calculation, based on the specific parameters of this Scheme, including for overplanting.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-38	5 Capacity factors and the Applicant's projected Scheme power generation	The issue becomes particularly significant given the scale of Best and Most Versatile (BMV) land affected by the proposal. Where a scheme proposes the long-term change in land use of a nationally significant agricultural resource for more than forty years, the credibility and robustness of the claimed generation benefits become central to the planning balance. If actual operational performance at East Park may be materially lower than the Applicant's projection, then the justification for the loss of such a substantial area of high-quality agricultural land may be correspondingly weakened.	The effects of the Scheme on BMV agricultural land have been assessed and are matters to be weighed in the overall planning balance. The planning balance must consider the assessed benefits and harms as a whole, including the substantial policy weight afforded to the urgent need for renewable energy infrastructure, the temporary nature of the land-use change, and the secured measures for soil protection and restoration. There is no separate policy test requiring the Applicant to guarantee a particular annual output or demonstrate generation benefits per hectare. However, for the reasons set out in the responses above, the Applicant is confident in the capacity factor that has been used for their technical modelling, and that this presents a realistic calculation, based on the specific parameters of this Scheme, including for overplanting.
SEPE-D3-39	5 Capacity factors and the Applicant's projected Scheme power generation	1. Given the highly intermittent and seasonally variable nature of UK solar generation identified in publicly available DESNZ and National Energy System Operator data, can the Applicant clarify whether the statement that the Scheme could supply "almost half" of the non-renewable electricity consumed within BCC and HDC refers only to an aggregated annualised energy calculation rather than any continuous or real-time supply capability, and whether the claim assumes the "Scheme" contribution comprises electricity generated directly by the solar arrays alone rather than electricity imported from and re-exported to the grid via the proposed BESS? 2. Can the Applicant provide an hourly and seasonal breakdown, or equivalent modelling, demonstrating the extent to which the Scheme's projected generation profile aligns with actual electricity demand patterns across BCC and HDC, particularly during autumn and	1 & 2. The Applicant's calculations in drawing a comparison to the electricity requirements in the BBC and HDC areas are set out between paragraphs 2.6.6 and 2.6.10 of the Planning Statement [APP-031]. Further explanation is also provided in response to Q1.7.2 in the Applicant Response to Examining Authority's First Written Questions [REP3-072]. The Applicant's calculations are based on on-site solar generation only. BESS operations are not included for in the estimates of electricity generation to be supplied to the national grid. The seasonal variability of solar generation is accounted for in the capacity factor used, which is as set out in the above responses. It is not possible to predict a precise hourly or seasonal breakdown for the Scheme's projected generation, which is why

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		winter periods and evening peak demand when solar generation is limited or absent, and distinguishing between direct solar generation and any electricity discharged from the proposed BESS?	capacity factors are used as a proxy to establish forecast generation as far as reasonably required. As set out in previous responses, national policy proceeds on the clear basis that solar PV is an established, effective and necessary technology in the UK's energy mix, with Government identifying solar as a key part of the Clean Power 2030 mission and recognising large-scale solar as viable in the UK context. The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS.
SEPE-D3-40	5 Capacity factors and the Applicant's projected Scheme power generation	1. Can the Applicant explain, with supporting calculations and irradiance assumptions, how the projected annual generation figure of approximately 433.2GWh has been derived, given that this appears to imply a capacity factor materially above both local and regional performance and typical UK ground-mounted solar averages? 2. Has the Applicant undertaken any sensitivity testing using lower irradiance or average long-term meteorological conditions and, if so, what annual generation outputs and capacity factors result from those scenarios? 3. What consideration has the Applicant given to observed operational performance at nearby solar installations, including the Manor Farm solar site adjacent to the proposed Scheme? 4. In the event that actual operational generation were materially lower than the figures presently relied on by the Applicant, what assessment has been undertaken of the consequential effect on the Scheme's claimed	1. The Applicant has provided a response on the assumed capacity factor with reference to SEPE-D3-35 above. 2. The Applicant has not undertaken any specific sensitivity testing using lower irradiance or average long-term meteorological conditions. The Applicant is confident in the capacity factor that has been used for their technical modelling, and that this presents a realistic calculation, based on the specific parameters of this Scheme, including for overplanting. As set out in the responses above, the Applicant's assumptions are consistent with national average solar capacity factors published by DESNZ in 2025, whilst accounting for the specifics of this Scheme. 3. The Applicant has given limited consideration to any observed operational performance at nearby solar installations as the Applicant does not have access to the specifics of any of those Schemes. This includes the current installed panels, the maintenance regime, any unexpected downtime, etc.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		carbon savings and the overall planning balance, particularly in relation to the extent of BMV agricultural land affected?	4. Any variation in actual operational generation is expected by the Applicant to be negligible in relation to the Applicant's carbon calculations reported in ES Vol 1 Chapter 15 [REP2-012] . Any variation would not (in the Applicant's opinion) alter the conclusions in relation to the planning balance. The Applicant has set out their consideration of the planning balance at Section 8 of the Planning Statement [APP-031] .
SEPE-D3-41	6 Crime, security infrastructure and rural community impact	SEPE notes that to date, only one NSIP-scale solar complex has so far been constructed (the solar power component of Cleve Hill went into operation in mid 2025). Available national data from Opal, the Serious Organised Acquisitive Crime national intelligence unit, therefore relates to smaller scale sites. SEPE here presents data on solar power site crime, according to Opal (Figure 2). The Cleve Hill project also offers evidence of additional security measures introduced post DCO. High-intensity floodlighting had to be installed as illustrated in Figure 3. Given both national data on serious organised acquisitive crime associated with ground-mounted solar sites, evidence from the Cleve Hill solar NSIP, and the four related principal concerns set out in the SEPE WR, SEPE contends that it is not appropriate for the Applicant to attempt to dismiss concerns set out in its WR on criminal gang targeting of rural solar sites, and suggests that this is an area which warrants continued scrutiny under the Examination.	The Applicant does not dismiss the possibility that ground-mounted solar infrastructure may be targeted for theft or other criminal activity, and has designed the Scheme to include appropriate security measures such as perimeter fencing, controlled access arrangements, CCTV and other appropriate monitoring and alarm systems. These are normal features of a commercial solar development and are not unusual or exceptional in nature. The impacts of such infrastructure have been assessed within the ES. The Opal information provides a national intelligence context with Opal's function to develop intelligence and coordinate the response to serious organised acquisitive crime. The information demonstrates that asset security is an operational matter requiring management, but it does not establish the probability of an incident at East Park or a likely consequential effect on surrounding communities. The purpose of the ES is to identify, describe and assess the likely significant effects of the Scheme on the environment, which the Applicant has done. The matters raised by SEPE are principally matters of site security, operational management and crime prevention. The oOEMP [REP3-052] sets out there would be permanent security fencing, CCTV and other monitoring systems, the securing of plant and materials, and regular

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			inspection and prompt repair of security infrastructure. It does not provide for widespread or continuous floodlighting. No part of the Scheme would be continuously lit. Lighting at the East Park Substation would be manually operated and would not remain illuminated when staff are absent, while temporary mobile lighting elsewhere would be infrequent, directional and used only where necessary. CCTV would use infrared technology to minimise lighting effects. Accordingly, SEPE's assumed requirement for extensive permanent floodlighting, and the associated landscape, ecological and privacy effects, does not form part of the Scheme and has not been shown to be necessary. The Applicant is not able to comment on the specifics as to the context as to why lighting was being deployed on Cleve Hill at the time the photograph was taken, whether such lighting was approved under the DCO, or whether it falls outside the environmental effects assessed for that development. Construction-phase vulnerability would be managed through the CEMP and by the Principal Contractor, including temporary fencing, secured equipment and materials, and remote intrusion detection. The possibility of an isolated security incident does not itself demonstrate a likely significant increase in police or emergency-service traffic. The Applicant has also confirmed that it will liaise with the local police so that security measures and responses remain proportionate and effective, while the Community Liaison Group provides an ongoing mechanism through which relevant concerns may be raised during operation. The information relied upon by SEPE does not demonstrate an unassessed likely significant environmental effect, a likely displacement of crime into neighbouring communities, or a need for the extensive lighting and surveillance measures assumed in its representation. The Applicant therefore maintains the conclusions of the ES.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-42	6 Crime, security infrastructure and rural community impact	1. What assessment has the Applicant undertaken of whether theft risk could require additional fencing, CCTV, patrols, alarms or night-time lighting over time, and how would those measures affect landscape, ecology, dark skies and residential amenity? 2. Has the Applicant assessed fear of crime, disturbance from alarms or patrols, and reduced perceived safety on rural lanes and PRowS as potential effects on population and human health? 3. How has the Applicant assessed the particular risks arising from unauthorised access or criminal damage at the BESS compound, including fire risk, system interference and obstruction of emergency access? 4. Has the Applicant assessed how theft or attempted theft during construction could affect traffic assumptions, emergency access, police attendance, programme delay and disturbance to nearby communities?	1. The Applicant has assessed crime and theft as operational risks and has incorporated proportionate security measures into the Scheme design, including perimeter fencing, infrared CCTV and monitoring systems, the securing of plant and materials, and regular inspection and repair of security infrastructure. These measures form part of the assessed design envelope and are secured through the detailed design and operational management requirements. The assessment does not assume that extensive patrols, enhanced fencing or permanent night-time lighting would be required. CCTV around the solar arrays would operate using infrared technology and would not require associated lighting. No part of the Scheme would be continuously illuminated, and operational lighting would be limited, directional and used only where necessary. The ES has assessed the resulting effects on landscape character, views, ecological receptors, dark skies and residential amenity. Security arrangements may appropriately respond to experience and changing threat intelligence over the Scheme's lifetime, however, measures giving rise to materially new or different effects from those assessed in the ES would require further assessment and consent from the relevant local planning authority. 2. The Applicant has assessed the impacts of criminal activity on human health within Table 16.3 of ES Vol 1 Chapter 16 [APP-052]. This concluded that whilst the Scheme represents a potential opportunity for criminal activity during all phases of development, the adoption and implementation of robust site safety and security measures will mean that health risks associated with crime are likely to be negligible. Therefore, there

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			are unlikely to be any significant health effects arising from the Scheme. 3. The Applicant has not undertaken any separate specific assessment of criminal-related activity at the BESS compound. Fire risk resulting from the BESS has been assessed separately, with control measures set out in the outline Battery Safety Management Plan [APP-162]. 4. The Applicant does not consider that a speculative individual incident requires a separate traffic assessment, or assessment of programme impact, as whilst it is a potential hazard it is not reasonably foreseeable that it would give rise to likely significant effects. Any police or emergency-service attendance would be occasional incident-response traffic, rather than routine Scheme traffic, and would not materially alter the assessed construction traffic flows. Programme delay arising from theft would principally be a construction and commercial matter. Where an incident required replacement deliveries, repairs or resequencing, those activities would remain subject to the approved routes, working hours and environmental controls.
SEPE-D3-43	7 Funding, restoration and long-term deliverability	In its response to the SEPE WR, the Applicant appears to argue that the law only requires a Funding Statement sufficient for compulsory acquisition purposes; future project finance would fund the scheme including decommissioning; Requirement 18 of the DCO legally obliges restoration and decommissioning; and this approach is standard and precedented in NSIP practice.	The Applicant refers to the Applicant Response to Stop East Park Energy [REP2-045] , specifically Section 4 (Response on Project Funding and Deliverability), where the requirements in respect of funding for an application for a development consent order under the Planning Act 2008 are addressed in full. The Applicant maintains that the Applicant's Funding Statement [REP3-015] addresses these requirements appropriately.

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		It does not appear to provide any concrete long-term secured funding mechanism specifically guaranteeing restoration liabilities many decades into the future.	With respect to decommissioning and restoration obligations, the Applicant maintains for all the reasons outlined in its previous submissions, including the Applicant Response to Stop East Park Energy [REP2-045], that policy does not require a decommissioning bond or financial security for solar development as a matter of principle and that decommissioning liabilities are appropriately secured in the draft DCO (in particular, Requirement 18) as well as control documents in a clear and enforceable manner which is both consistent with established practice on solar DCOs and the Secretary of State's position on this issue. In particular, this position was notably upheld by the Secretary of State in the decision on The Oaklands Farm Solar Park Order 2025, where the Secretary of State omitted the recommendation to include a decommissioning fund requirement. In doing so, the Secretary of State held that <i>"there is no policy requirement for a decommissioning fund to be imposed"</i>, that <i>"the Secretary of State does not consider that imposing a decommissioning fund requirement is necessary"</i> and further that this approach <i>"is consistent with paragraph 4.1.16 of NPS EN-1 which stipulates that the Secretary of State should only impose requirements that are, amongst other things, necessary, and the requirement in paragraph 4.1.16 of NPS EN-1 that only relevant requirements should be imposed."</i> This position was subsequently reaffirmed in the decision on the Springwell Solar Farm Order 2026, where the decision letter provided that <i>"the ExA considered a decommissioning funding</i>

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			<i>bond was not required” and “The Secretary of State...agrees with the ExA that a decommissioning funding bond is not required.”</i> As such, the approach taken in the draft DCO (and other solar DCOs) reflects a deliberate and consistent application of national policy, and the settled position that reliance and weight can be given to the controls available with the planning regime (notably the existence of offences for breach), which offer protection to enforce decommissioning and restoration obligations and/or liabilities.
SEPE-D3-44	7 Funding, restoration and long-term deliverability	SEPE notes that the Applicant has previously relied on the existence of legal obligations within the dDCO as the basis for concluding that future restoration and decommissioning activities would be adequately secured. SEPE does not dispute that compliance with the dDCO would constitute a legal obligation. However, SEPE submits that the existence of a legal obligation does not, in itself, necessarily demonstrate that sufficient financial resources would be available to discharge those obligations at the relevant time, particularly where the operational lifecycle of the Proposed Development may extend over several decades; ownership structures, operators and financing arrangements may materially evolve over time; and the detailed scope, methodology and cost of decommissioning activities are themselves substantially deferred until a relatively late stage in the lifecycle of the Scheme. In those circumstances, SEPE contends that the Examination presently contains limited information	The Applicant maintains for all the reasons outlined in its previous submissions, including the Applicant Response to Stop East Park Energy [REP2-045] and those above, that policy does not require a decommissioning bond or financial security for solar development and that decommissioning liabilities are appropriately secured in the draft DCO (in particular, Requirement 18) as well as control documents in a clear and enforceable manner which is both consistent with established practice on solar DCOs and the Secretary of State's position on this issue.

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		regarding the practical mechanism through which long-term decommissioning, infrastructure removal and land restoration liabilities are intended to remain financially deliverable in practice. This is particularly relevant given that substantial decommissioning and restoration obligations may arise within a comparatively short timeframe following cessation of operation, potentially requiring significant capital expenditure at a point when future project revenues, ownership structures and financial arrangements cannot presently be known with certainty.	
SEPE-D3-45	7 Funding, restoration and long-term deliverability	SEPE further notes that concerns regarding the absence of any secured or ring fenced decommissioning funding mechanism were discussed during Issue Specific Hearing 1 ('Issue Specific Hearing 1, on (ISH1) – Part 1, Hearing Transcript'). The Applicant's senior legal representative acknowledged that no dedicated remediation or restoration fund presently exists and instead suggested that some "comfort" could be taken from the likelihood that landowners would wish to see the land restored at the end of the Scheme's operational life. SEPE submits that these comments are material because they appear to confirm that the current approach relies primarily on future compliance with legal obligations under the dDCO, rather than any identified secured financial mechanism capable of guaranteeing that sufficient resources would remain available to fund decommissioning, infrastructure removal and land restoration several decades into the future. The ISH1 exchange also highlighted the potential risk that liability could ultimately fall on landowners or public authorities	The Applicant maintains for all the reasons outlined in its previous submissions, including the Applicant Response to Stop East Park Energy [REP2-045] and those above, that the issues raised by SEPE in respect of decommissioning and restoration are appropriately covered in the draft DCO as well as control documents read alongside and certified by the draft DCO, and that this is entirely consistent with established practice on solar DCOs and the Secretary of State's position on this issue. The Applicant further does not agree that the absence of a decommissioning bond gives rise to a risk that liability could ultimately fall on landowners or public authorities. The decommissioning and restoration obligations in the draft DCO apply to the undertaker and any successor benefiting from the Order. The DCO is therefore personal to the undertaker (save where the benefit of the Order is lawfully transferred) and does not 'run with the land' like a typical planning permission. Any

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		in circumstances where future operating entities no longer exist or lack the financial capacity to discharge those obligations.	enforcement action can therefore only be taken against the undertaker, not any third party. The Applicant also notes that there is no precedent for a DCO imposing obligations on landowners following decommissioning, notwithstanding that this issue has been considered in other solar DCO examinations, including Sunnica. For the avoidance of doubt, the Applicant is fully aware of its obligations with regards to decommissioning, and notes that any undertaker that has the benefit of the Order would similarly be required to comply with those obligations. Further, the Applicant's position remains that the controls available within the draft DCO and planning regime offer sufficient protection to enforce decommissioning and restoration obligations and/or liabilities. In particular, it is a criminal offence under the Planning Act 2008 ("the PA 2008") (Section 161 of the PA 2008) not to comply with a requirement in a DCO, and the Proceeds of Crime Act 2002 acts as a further deterrent to such a breach given that the solar infrastructure would represent a valuable asset for the Applicant. The Applicant notes that this position has been clearly and consistently articulated in its previous submissions, including at Issue Specific Hearing 1.
SEPE-D3-46	7 Funding, restoration and long-term deliverability	1. What is the Applicant's intended approach to ensuring long-term financial deliverability of restoration and decommissioning obligations? 2. Is any form of lifecycle financial assurance, parent company support or shareholder backing anticipated in relation to those obligations?	The Applicant's position is that the matters noted in this representation are not material planning considerations relevant in the context of an application for a development consent order under the Planning Act 2008.

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		3. How does the Applicant consider that long-term decommissioning and restoration liabilities would remain practically deliverable throughout the operational lifecycle of the Scheme?	As stated in the Applicant Response to Stop East Park Energy [REP2-45] , the extent to which the Applicant is required to demonstrate funding is set out in the Applications: Prescribed forms and Procedure) Regulations 2009 (the “APFP Regulations”), read in conjunction with the Department for Communities and Local Government (now known as the Ministry of Housing, Communities and Local Government) guidance entitled ‘Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land’ (the “Guidance”), and the Applicant’s Funding Statement [REP3-015] addresses the requirements of the APFP Regulations and the Guidance in full.
SEPE-D3-47	8.1 Uncertainty over aspects of the ecological baseline and subsequent assessment of specific environmental impacts	While individual, discrete habitats have been referred to, and impacts of the Scheme, to some degree, assessed, overall habitat loss on this scale is irreversible due to the large land-take of the Scheme. The whole of the Scheme’s area is important for ecosystem functioning, including habitat for fauna; for example, in the case of skylark, which need a large area for singing and displaying. They are not currently confined to ‘skylark plots’, as is the planned mitigation under the Scheme. It should be noted that mobile species do not recognise boundaries. The loss of habitat mosaics is significant. Habitat mosaics, different habitats occurring both spatially and temporally, are important for all species (flora and fauna), for example, in terms of interrelated food webs. These cannot be re-created if the main area of the Scheme is covered by solar panels and related infrastructure.	ES Vol 1 Chapter 7 [APP-043] and proposed mitigation measures acknowledge the mobility of species, for example through the inclusion of minimum 6m hedgerow buffers providing 12m wildlife corridors, through the inclusion of mammal gates within solar fencelines to allow continued movement through the landscape and through the creation of significant areas of open grassland habitat. The Applicant wishes to clarify that ‘skylark plots’ are not proposed as mitigation, but instead a more holistic approach has been taken through the creation of extensive meadow grassland of benefit to skylark and a range other species as detailed within the outline Farmland Bird Mitigation Strategy forming Appendix C of the outline Landscape Ecological Management Plan [REP3-056]. Further, it has been shown that skylark will utilise land within solar farms for foraging and as a nursery area for young birds. It should be noted that the full breadth of habitats within the Site is accounted for within the Biodiversity Net Gain Report [REP3-068], which indicates a biodiversity net gain of +77.85% in

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			habitat units, +36.91% in hedgerow units and +5.95% in watercourses.
SEPE-D3-48	8.1 Uncertainty over aspects of the ecological baseline and subsequent assessment of specific environmental impacts	In general, disturbance effects to all species, including plants, mammals, birds, amphibians and reptiles and invertebrates, from both preparation of the site (including clearance), and construction of the Scheme, have been underestimated. In some cases, the ecological survey coverage (area, timings, species) has been inadequate to fully assess the impacts on all habitats and species affected by the Scheme. These aspects are likely to have under-recorded habitats and species, and therefore, led to a lower number of adverse impacts being identified.	The effects of disturbance have been assessed within ES Vol 1 Chapter 7 [APP-043]. Construction is restricted to the construction and decommissioning phases, with negligible Site presence required through operation and so unlikely to result in disturbance during this phase. It is noteworthy that construction across the site will be staggered as indicated in the Indicative Construction Phasing and Resource Schedule [APP-055] and as such disturbance would not be concurrent across the whole Order Limits at any one time. Further, works within each Site would themselves be staggered. The Applicant has set out in previous submissions the reasons why it considers the ecological survey coverage to be adequate.
SEPE-D3-49	8.2 'Statement of Common Ground (Draft) between the Applicant and Environment Agency'	SEPE questions how the Applicant will address the Environment Agency's concerns with respect to otter surveys and potential disturbance of this protected species. The Applicant reports that the oCEMP: "includes for a pre-construction survey to identify otter holts". SEPE notes that the Applicant makes no reference to their large territories of 20 30km, which mean that otter are likely to be moving over a far larger area than currently identified by the Applicant, and therefore, the impacts of the development may be wider. SEPE considers that otter surveys should be undertaken in advance of any site work.	The Applicant has acknowledged the extensive home range of otters within ES Vol 1 Chapter 7[APP-043] '<i>Taken together with desk study records and considering the <u>extensive home range</u> [emphasis added] and recent population increases of otters, it is considered likely that otters are utilising watercourses located within and adjacent to the Site, including the River Kym, Pertenhall Brook and Duloe Brook, and may occasionally utilise smaller tributaries of these watercourses</i>'. As such, field surveys were undertaken as presented in ES Vol 2 Appendix 7-6 [APP-096]. Further otter survey will be undertaken in advance of site work, with the outline Construction Environmental Management Plan (oCEMP) [REP3-048] requiring a pre-construction survey of suitable aquatic and terrestrial habitat within 100m of proposed

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			works. Additionally, Reasonable Avoidance Measures (RAMS) will be implanted as outlined in the oCEMP.
SEPE-D3-50	8.4 'Applicant Response to Stop East Park Energy'	SEPE considers that important gaps may remain in the ecological data and assessment presented by the Applicant, particularly in relation to ecosystem functioning, protected species, invertebrates, farmland birds, hedgerows and Biodiversity Net Gain. In SEPE's view, these matters may affect the robustness of the assessment of likely significant effects and the appropriateness of proposed mitigation measures.	The Applicant has set out in previous submissions the reasons why it considers the ecological survey coverage to be adequate.
SEPE-D3-51	8.4 'Applicant Response to Stop East Park Energy' para. 3.2.7.	SEPE challenges the Applicant's claim that it does not need to: "...provide comprehensive information on all conceivable environmental matters, irrespective of whether those matters are likely to generate significant effects, or are capable of influencing the reasoned conclusion". As stated previously by SEPE, the development area functions as an ecological 'whole', in which ponds, ditches, hedgerows, trees and open fields operate as interconnected components of a wider ecosystem. Most species will not be confined to one habitat type. At the same time, not all species are entirely mobile and able to find other suitable habitats. Impacts on one habitat or species may generate indirect or cumulative effects across the wider ecological network.	The Applicant maintains that the Assessment has identified appropriate ecological features and maintains existing comments referenced by SEPE, however further information is provided as follows. Ecological features to be scoped in have been determined through consultation with relevant bodies through consultation as detailed within Section 7.3 of ES Vol 1 Chapter 7 APP-043. This included the production of an EIA Scoping Report, Preliminary Environmental Information Report (PEIR) and 'ad hoc' consultation including meetings and engagement of Natural England Discretionary Advice Service. As detailed within Section 7.8 of ES Vol 1 Chapter 7 [APP-043]: <i>'In accordance with the CIEEM guidance (2018)¹, the assessment only assesses in detail, impacts upon important ecological features i.e., those that are considered important and potentially affected (as set out in Section 7.4 Methodology [of the</i>

¹ CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2 (updated April 2022)*. Chartered Institute of Ecology and Environmental Management, Winchester.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		Consequently, SEPE contends that it is not sufficient for the Applicant to consider environmental effects in isolation or to dismiss matters on the basis that they are not considered individually significant at first instance. A decline in beetle, earthworm and caterpillar populations, for example, may detrimentally affect hedgehogs and predators higher within the food chain, such as badgers, demonstrating how apparently limited impacts can produce wider ecological consequences.	<i>Ecology Chapter]). It is not considered necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened, and resilient to project impacts and will remain viable and sustainable, unless there is potential for a significant beneficial or adverse effect as a consequence of the Scheme.</i> <i>Where ecological features are not considered important enough to warrant further consideration, or where they will not be significantly affected, these can be scoped out of the assessment process, and justification for exclusion is provided. Where a feature has been scoped out of the detailed assessment, due to a lack of significant effects, measures to protect, enhance or ensure legislative compliance are included in Section 7.6 [of the Ecology Chapter] embedded mitigation.'</i> As such, the assessment has been undertaken in line with industry standard best practice guidance. It is further noted that the assessment does account for impacts on important ecological features that may occur due to effects on the wider ecosystem, for example a change in food source availability, or change in predation and as such important ecological features are not assessed in isolation of wider ecological effects.
SEPE-D3-52	8.4 'Applicant Response to Stop East Park Energy' paras. 3.2.9 and 3.2.11.	Scoping out bat populations by the Applicant (in and around Swineshead Wood Site of Special Scientific Interest, which is of note for several bat species, some of which have conservation status) is considered inadequate by SEPE. Bats are protected species under the relevant legal frameworks. In the wider context of the overall development area, SEPE notes that there is a question from the Examining Authority in relation to bat flight paths. SEPE also notes that different bat species feed on different invertebrates, including moths, midges,	Foraging and commuting bats (i.e., bats that may roost within Swineshead Wood, but use habitats within the Site for foraging and commuting) have been scoped in to the assessment. It is noted that Swineshead wood SSSI is designated for its woodland, and while these designated habitats may support bats they are not a designated feature themselves.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		gnats and mayflies, so it is also important to understand the location or potential locations of various invertebrates within the wider ecosystem. Failure to do this could lead to impacts on bats in relation to the loss of foraging routes and effects on feeding.	
SEPE-D3-53	8.4 'Applicant Response to Stop East Park Energy' paras. 3.2.9 and 3.2.11.	Likewise, the Applicant has not undertaken a beetle survey (see above, in relation to food sources for other fauna). A number of rare beetles in the UK are associated with ponds and ditches on agricultural land and hence this is a gap in the ecological baseline provided by the Applicant.	Ponds and ditches, along with other high value habitats for invertebrates, will be retained and protected, and as such invertebrate surveys are not considered necessary. It is considered that habitat improvements and cessation of agricultural use (including insecticides and other pesticides) would also have benefits to the invertebrate population within the Site.
SEPE-D3-54	Applicant's response to Procedural Deficiency table set out in SEPE's WR 11A Ecology.	11A Ecology. SEPE's comments stand as it contends that it is not possible to determine an ecological impact without adequate data. The importance of ecosystem functioning is highlighted above due to the fact that species and habitats are interrelated, both directly, such as through feeding relationships, and indirectly, such as with respect to predation.	ES Vol 1 Chapter 7 [APP-043] and assessment of ecological impacts within has been undertaken following industry standard best practice guidance, including CIEEM Guidelines for EclA.
SEPE-D3-55	Applicant's response to Procedural Deficiency table set out in SEPE's WR 11B Farmland bird importance	SEPE suggests that mitigation for other ground-nesting birds should be considered alongside skylark-specific mitigation to maximise gains for birds overall. The Applicant states: "Research undertaken by the RSPB and Natural England has found that well managed UK solar farms can significantly boost both bird abundance and species richness..."	The Farmland Bird Mitigation Strategy that forms part of the oLEMP [REP3-056] considers likely outcomes on a range of ground nesting and non-ground nesting bird species. It is confirmed that one of the papers referred to is as identified by SEPE, full reference as follows: Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. <i>Bird Study</i>, 72(3), 217–222. https://doi.org/10.1080/00063657.2025.2450392

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	and territory mapping.	The Applicant does not cite specific studies. SEPE suggests that one of the papers it is referring to may be a study by the University of Cambridge, in association with the RSPB, on bird populations on six small-scale solar farms in the East Anglian Fens. SEPE notes that its findings may not readily be extrapolated to significantly larger transmission-scale solar power schemes. The study findings are complex and qualified. For example, the paper states: “...care should be taken when siting solar farms on high grade farmland...” “...careful planning is needed to ensure solar farms are sited in suitable areas, if managed with biodiversity in mind then their impact can be beneficial...” “...simple habitat solar farms apparently offered only marginally greater structural diversity than arable fields...” “Solar farms have been shown to negatively affect the activity of bats ... studies focused on solar sites that were situated on grassland that was grazed or mown...”	Further studies are also referenced, including Montag <i>et al</i> (2016)² and Solar Habitat UK reports³ It is acknowledged that research pertaining to the effects of solar farms, and particularly large scale (e.g., DCO schemes) is relatively sparse in a UK context due to the recent rapid expansion of the technology, and as such the Applicant has proposed monitoring as set out in the oLEMP [REP3-056]. The assessment of impacts within ES Vol 1 Chapter 7 [APP-043] has been undertaken with reference to the best available scientific literature. The results of such studies has informed the Site design, for example measures outlined in Tinsey <i>et al</i>⁴ including maintaining boundaries and including planting to improve foraging habitat.
SEPE-D3-56	Applicant's response to Procedural Deficiency table set out	SEPE's comments stand with respect to potential collision, disturbance and displacement risks. The impacts should be assessed and mitigation measures	The Applicant maintains previous comprehensive comments provided as Table 3 ref 11c to Applicant Response to Stop East Park Energy [REP2-045] in relation to this matter and has nothing further to add.

² Montag, H., Parker, G. & Clarkson, T. 2016. *The effects of solar farms on local biodiversity: a comparative study.* Clarkson and Woods and Wychwood Biodiversity.

³ <https://solarenergyuk.org/wp-content/uploads/2025/04/SEUK-Solar-Habitat-2025-3.pdf>

⁴ Tinsley, E., Froidevaux, J. S. P., Zsebők, S., Szabadi, K. L., & Jones, G. (2023). *Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity.* *Journal of Applied Ecology*, 60, 1752–1762. Available at: <https://doi.org/10.1111/1365-2664.14474>

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	in SEPE's WR 11C Red kite collision and disturbance risk.	included in the Construction Environmental Management Plan.	Red kite collision risk is not a known impact of solar PV installations in a UK context.
SEPE-D3-57	Applicant's response to Procedural Deficiency table set out in SEPE's WR 11D Precautionary assessment under NEER012 Framework.	SEPE considers that observations of invertebrates were undertaken at a general level as part of the wider habitat survey of the development area. At present, it is not possible for the Applicant to state that there will be benefits for the invertebrate assemblage within the development site or the surrounding area. Specific, baseline invertebrate surveys, such as for flying and ground invertebrates, would allow better assessment of impacts, particularly in relation to bird and bat feeding.	The applicant considers that the survey effort for invertebrates is proportionate to the level of impacts. The ecological assessment as presented in ES Vol 1 Chapter 7 [APP-043] has been produced with reference to best available scientific evidence. It is notable that the Scheme is situated principally on agricultural land of negligible value to biodiversity and for which management typically includes use of insecticides.
SEPE-D3-58	Applicant's response to Procedural Deficiency table set out in SEPE's WR	SEPE states that the grid connection is an integral component of the authorised development. Gaps in the ecological baseline and impact assessment may not enable the Examining Authority to determine the likely significant effects of the development. This has implications for the targeting of site specific mitigation measures	ES Vol 1 Chapter 7 [APP-043] has assessed the grid connection as part of the proposed development.
SEPE-D3-59	Applicant's response to Procedural Deficiency	SEPE's comments stand, on the basis that hedgerows are important for the overall ecological functioning of the development site, being refuges and potential refuges	The Applicant maintains previous comprehensive comments provided as Table 3 ref 11g to Applicant Response to Stop East Park Energy [REP2-045] in relation to this matter and has nothing further to add.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
	table set out in SEPE's WR 11E Grid connection.	for invertebrates, badgers, hedgehogs and other fauna and flora. One issue is that replacement hedgerows cannot replicate the ecological value of established hedgerows. In particular, newly planted hedgerows do not provide equivalent shelter, connectivity or foraging opportunities for larger mammals and other species dependent on mature hedgerow habitats.	It is noteworthy that the Proposed Development proposes to plant 17.4km of hedgerow against 84m of loss, represented an increase in length over 200x greater than loss. It is also noted that Cambridgeshire County Council have accepted the Applicant's position in relation to hedgerows as reference 2.3.11 in their comments at deadline 2 [REP3-076].
SEPE-D3-60	Applicant's response to Procedural Deficiency table set out in SEPE's WR 11G Hedgerow Regulations consent strategy.	SEPE's comments remain relevant in the context of the development and the regional ecological importance of the development site.	The Applicant maintains previous comprehensive comments provided as Table 3 ref 11g to Applicant Response to Stop East Park Energy [REP2-045] in relation to this matter and has nothing further to add.
SEPE-D3-61	Applicant's response to Procedural Deficiency table set out in SEPE's WR	1. To what extent has the Applicant assessed the cumulative ecological impacts of this development in relation to other proposed solar power sites, BESS facilities, and NSIP projects within the wider area, particularly in relation to habitat connectivity and species displacement? 2. Given the acknowledged uncertainty and gaps in baseline ecological data, how can the Examining Authority be satisfied that the mitigation hierarchy has been properly applied and that significant adverse	1. ES Vol 1 Chapter 17 [APP-053] assesses cumulative effects with other developments. 2. It is not clear what specific gaps are being referred to, however the Applicant would welcome a clarification at the next deadline and will address any concerns in future submissions. 3. It should be noted that the habitats within the Order limits are overwhelmingly dominated by agricultural farmland, a habitat type that is entirely characterised by human intervention, offers a simple habitat structure, and is of negligible value for biodiversity. The habitats within the Order limits are not considered to represent a complex mosaic. The industry standard biodiversity

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		effects on protected and priority species have been fully identified and addressed? 3. What evidence can the Applicant provide to demonstrate that proposed habitat creation and Biodiversity Net Gain measures will replicate not only habitat area, but also the ecological functionality, complexity and long-term resilience of the existing habitat mosaics currently present across the development area? 4. How will Biodiversity Net Gain be 'translated' into real biodiversity gains? 5. How can the Applicant ensure adequate environmental monitoring and management takes place over this large, fragmented development site?	net gain metric calculator clearly demonstrates an uplift in biodiversity units, and it is also noted that high value habitats offering locally more complex and higher ecological value conditions (e.g. field boundaries, woodland and mature shrub) are retained and protected as part of the Scheme. 4/5. The biodiversity net gain objectives will be implemented through delivery of the oLEMP [REP3-056] which includes specific monitoring in relation to biodiversity net gain targets (habitat type and condition).
SEPE-D3-62	9 Relationship of the SEPE submissions to Local Impact Reports and wider Examination evidence	SEPE notes that a number of concerns raised within the Written Representation align materially with issues identified elsewhere within the Examination process, including within Local Impact Reports and submissions from statutory consultees. The significance of this alignment is that the concerns raised by SEPE are not isolated or speculative observations. Rather, a number of independent participants within the Examination have identified related concerns regarding matters including: • construction traffic; • environmental assessment completeness; • hydrology and drainage; • BESS safety;	It is a central purpose of the Examination to identify, scrutinise and test such matters through written submissions, hearings and responses from the Applicant and other participants. The Applicant has actively worked to address issues being raised during the examination and is confident that any remaining areas of disagreement can be resolved or narrowed before the conclusion of examination.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		• secured mitigation; • cumulative impacts; • operational uncertainty; and • adequacy of supporting evidence.	
SEPE-D3-63	10.1 Case law cited by SEPE	The Applicant's critique of SEPE's reliance on case law appears overstated. For example, for <i>Blewett</i>, the Applicant identifies alternative readings of the authorities cited by SEPE, but then appears to incorrectly treat those interpretations as negating SEPE's position altogether. That is a non sequitur. In <i>Blewett</i>, the Court recognised both that an Environmental Statement need not be "perfect" and that it must nevertheless contain sufficient information to enable an informed and reasoned conclusion on likely significant effects. Those propositions are not mutually exclusive. SEPE's reliance on <i>Blewett</i> for the principle of intelligible and sufficiently robust environmental assessment therefore remains entirely legitimate, even if the Applicant seeks to emphasise a different aspect of the judgment. The existence of nuance or competing emphasis within a case does not necessarily undermine the credibility of SEPE's submissions or the relevance of the authorities cited.	The Applicant has addressed its significant concerns in respect of SEPE's reliance on the case law it cited, including <i>Blewett</i>, in its previous submissions in considerable detail. The Applicant does not consider that these submissions impact that analysis, nor does the Applicant consider it proportionate to revisit that analysis. Accordingly, the Applicant refers to Appendix A (Review of Case Law cited by SEPE) of the Applicant Response to Stop East Park Energy [REP2-045], where these matters are dealt with in full. The Applicant notes that out of the 19 cases referred to in Appendix A (Review of Case Law cited by SEPE) of the Applicant Response to Stop East Park Energy, SEPE has identified specific concerns with only two of the cases that the Applicant commented on, being <i>Blewett</i> and <i>Holborn Studios</i> (see SEPE-D3-64 below). The Applicant's position therefore remains that many of the legal principles relied upon by SEPE were not supported by the case law cited, that a number of the authorities appear to have been misinterpreted or misconstrued, and that several are of little or no relevance to the Scheme or to the principles SEPE purports to derive from them. The Applicant submits that this goes beyond merely identifying alternative readings of these cases as SEPE suggest.

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
SEPE-D3-64	10.1 Case law cited by SEPE	Similarly, the Applicant's treatment of <i>Holborn Studios</i> appears to draw an unduly narrow distinction between the withholding of material and the adequacy of consultation. While the case was not an EIA authority as such, the Court expressly linked the failure to disclose underlying material with the inability of the public to engage meaningfully in the decision-making process. As the judge observed at paragraph 71: "The failure to provide the background material underpinning the viability assessment ... was a clear and material error in the decision-taking process. In reality, in my judgment, the material with which the public was provided failed [the] test of being adequate to enable the member of the public to make a sensible response to the consultation on the application". SEPE's reliance on the case for the broader procedural principle that decision-making requires sufficiently intelligible and accessible supporting information was therefore legitimate, even if the Applicant seeks to emphasise the narrower factual context concerning exempt material.	The Applicant notes SEPE's comments but disagrees that the Applicant's consideration of the <i>Holborn Studios</i> case was unduly narrow. The Applicant notes that Appendix B of SEPE's written representation [REP1-156] primarily sought to rely on the case in support of the legal principle that "<i>Conditions and requirements must provide sufficient certainty to ensure that mitigation will be implemented as assessed</i>" and similar principles relating to mitigation. The Applicant's comments explain that interpretation is not supported by the case as it is not a planning conditions case and the Court did not lay down any principles concerning the lawfulness of planning conditions, the precision or enforceability of conditions, or the use of conditions to secure mitigation. SEPE's comments at SEPE-D3-64 seek to rely on the case for a different legal principle, relating to the case's relevance in relation to the disclosure of information and public engagement in the decision-making process. While this was not the main focus of SEPE's submissions in their written representation, this is something that was acknowledged by the Applicant in the Applicant Response to Stop East Park Energy [REP2-045], which states that - <i>"SEPE note: "The courts have consistently emphasised that environmental information must be presented in a manner that enables an informed and rational decision, including in Blewett [2003], Holborn Studios [2020], and ClientEarth [2021]." (Page 31).</i> <i>This was somewhat a consideration in the case as the viability assessment published was redacted and the</i>

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
			<i>LPA failed to list background papers or to provide them for inspection. However, the key issue in this case was when it was justifiable to withhold exempt materials rather than information provided being informed or rational."</i> It is therefore the Applicant's position that the Applicant's treatment of the <i>Holborn Studios</i> case was not unduly narrow, but instead responded to the main principles that SEPE sought to draw from the case. The Applicant refers to Appendix A (Review of Case Law cited by SEPE) of the Applicant Response to Stop East Park Energy [REP2-045], where these matters are dealt with in full.
SEPE-D3-65	10.1 Case law cited by SEPE	By way of additional submission, SEPE also notes the relevance of <i>Lullington Solar Park Ltd v Secretary of State for Levelling Up, Housing and Communities and South Derbyshire District Council</i> [2024] EWHC 295 (16 February 2024), a recent Planning Court authority concerning the proposed development of a solar farm on 49% BMV agricultural land. <i>Lullington</i> further supports SEPE's position that policy-compliant site selection for solar development on BMV land requires a transparent and sufficiently robust assessment of reasonable alternatives. In that case, the Court upheld criticism of a site-selection exercise that relied on incomplete evidence regarding the availability of lower-quality agricultural land within the relevant grid-connection area, and accepted that uncertainty over the grading and comparative suitability of alternative sites could	The Applicant has considered the <i>Lullington</i> judgment but does not agree that it establishes the general proposition advanced by SEPE. <i>Lullington</i> concerned a fact-specific statutory challenge to an Inspector's decision under the TCPA regime. The Court did not hold that solar proposals involving BMV land must demonstrate that the application site is the "least harmful" available option, nor did it prescribe a particular alternatives methodology. Indeed, the judgment records that the relevance of alternative sites depends on the circumstances and that an applicant is not required to investigate every possible location or demonstrate that no possible alternative exists (paragraphs 33 and 36). The Court's conclusion was that the Inspector's planning judgment was one he was legally entitled to reach (paragraph 45). The Applicant has previously set out in detail how its approach to alternatives and site selection is consistent with national policy,

Our Ref.	SEPE Ref.	SEPE Comments	Applicant Response
		legitimately undermine confidence in the justification for developing BMV land. That reasoning aligns closely with SEPE's case that a grid-constrained and landowner-led search process does not, without more detailed and objective comparative analysis, demonstrate that the proposed BMV-intensive scheme is necessary or represents the least harmful available option.	such as in the Applicant's response to 'Procedural Deficiency 4A' in Table 3 of the Applicant Response to Stop East Park Energy [REP2-045] .

2.13 Response to Simon Christopher Ellis Lane

Table 15: Response to Simon Christopher Ellis Lane Comments on D2 Submissions (REP3-106)

Our Ref.	SCEL Comments	Applicant Response
SCEL-D3-01	The applicants hydraulic modelling report (EN010141 April 2026) does not provide an assessment of flooding pre and post development and only seems to review the on-site implication of flooding. Presumably, it is assuming that there is no off-site implication, on the basis that the solar farm will not change the runoff characteristics of the land. However, this is unlikely to be the case as such a development can reduce the amount of rainfall absorbed into the ground and increase the rate and volume of surface water runoff, which can increase flood risk. Specifically, the panels themselves can contribute to increases in total runoff, while the ability of the land to absorb water will be significantly reduced through the replacement of large areas of existing greenfield with access tracks. Modelling has also not considered the potential influence of the following engineering proposals that could interrupt or change overland flow routes in comparison to the existing situation. * Proposals to erect panels on concrete foundations raised above ground level in areas of archaeological constraints. * Proposals to erect fencing around the perimeter of solar panel compounds. * Proposals to construct access tracks over existing ditches and watercourses in multiple locations by means of culverting and localised raising of ground levels for construction of suspended slabs and bridges. * Proposals to construct the BESS facility within a flood flow path. In conclusion, the report is insufficient to demonstrate that the solar farm will not increase flood risk, because it appears to assess only on-site	The Hydraulic Modelling Report [as updated alongside this submission] and ES Vol 2 Appendix 8-1 Flood Risk Assessment [as updated alongside this submission] have been updated to provide commentary on the post-development hydraulic modelling work undertaken for the Site. This work has considered the hydraulic impacts of the panel support frames (including where concrete foundations have been proposed) on surface water flooding. The conclusions of this assessment have been reported within ES Vol 2 Appendix 8-1 Flood Risk Assessment [as updated alongside this submission] (Section 4.4 and Figures 12a-12b) and show there to be no significant impacts. The change in depth caused by the panel frames is less than +/- 0.01 m (10 mm) across most of the Site. The maximum depth change is an increase of 0.032 m (32 mm) within the west of East Park Site B. The results show no change in flood depth greater than +/- 0.01 m outside of the Order limits. Because of the small gauge wire mesh and widely spaced, narrow posts which will present insignificant obstruction to flows the impact of perimeter fencing on surface water flow routes is considered to be negligible. The surface water flow routes across the solar panelled areas are generally shallow and low energy, therefore there is not expected to be significant transportation of large debris (which might cause blockages across a fence mesh). ES Vol 2 Appendix 8-3 Watercourse Crossing Assessment [APP-100] describes how all but one of the new watercourse crossings will be clear span bridge structures, rather than culverts. During the detailed design stage, hydrological and

Our Ref.	SCEL Comments	Applicant Response
	flooding impacts and fails to account for several development features that are likely to alter runoff patterns and overland flow routes. As a result, there is a material risk that the development could increase both on-site and off-site flooding compared with the existing greenfield conditions.	hydraulic assessments will be undertaken (including for both the clear span bridges and culvert) to ensure that the soffit levels are appropriate for the design flood event. In this way the crossing structures will be designed so that they will not have any significant impacts upon flow conveyance and therefore upstream or downstream flood risk. With regard to the BESS facility, there are two minor flow routes apparent in surface water flood mapping, both of which emanate from within the BESS compound. The surface water flow routes emanating from the BESS compound are considered to be the product of rainfall within the BESS compound. Rainfall within the BESS compound is managed by the drainage design presented within the outline Surface Water Management Plan [REP3-064], which provides attenuation storage so that runoff is discharged to the receiving watercourse at greenfield (baseline) rates. In this way flood risk will not be increased by the BESS compound.
SCEL-D3-02	Regarding the BESS proposals, has consideration been given in the event of the worst-case flood event coinciding with a fire? In such an instance how would contaminated run off be managed – this needs to be addressed.	The outline Surface Water Management Plan [REP3-064] has demonstrated that in the event of a BESS fire and complete emptying of the fire water tanks within the compound, there is sufficient capacity within the lagoon to also provide storage for the 1 in 2yr +CC return period storm (rainfall) event. This is considered to be a very conservative provision, since the probability of coincidence of a BESS fire with a storm equal to or greater than the 1 in 2yr event, is negligible.
SCEL-D3-03	The long timescales quoted for new hedge row growths and planting are misleading based on the planting at the existing Manor Farm which are completely ineffective after circa 10 years. I urge the inspector to examine these as part of his site visit – several of the routes will enable this to be viewed. By contrast other new hedgerows on Manor Farm [redacted] have reached a decent height in a much shorter	The Applicant cannot comment on the hedgerow growth rates at the Manor Farm Solar Farm and why planting may have failed to establish effectively. The Applicant notes however that other hedgerows on Manor Farm have established more successfully. Successful establishment of any planting comes down the approach taken to the planting, and then the ongoing

Our Ref.	SCEL Comments	Applicant Response
	timescale. Our own boundary hedgerow consisting normal native species has reached 2.5m in less than 4 years with no special attention so I would suggest the size of the initial planting needs to be reconsidered to make any significant impact on screening in what amounts to a quarter of the planned lifespan of the project.	maintenance afterwards. The Applicant's framework approach is set out in the outline Landscape and Ecological Management Plan [REP3-056] , which will be developed into a final Landscape and Ecological Management Plan for approval by the Local Planning Authority prior to construction.

2.14 Response to Tim Price

Table 16: Response to Tim Price Comments on D2 Submissions (REP3-109)

Our Ref.	TP Comments	Applicant Response
TP-D3-01	All of the land surrounding my property, in Little Staughton, is classified as Grade 2 agricultural land. This directly conflicts with the applicant's assertion that alternative sites closer to the existing solar installations were rejected on the basis of being Grade 2 agricultural land. If the land surrounding is of the same agricultural grade as the land that was rejected, then it is unclear why one area was considered suitable while the other was dismissed. The applicant has not provided a consistent or convincing explanation for this distinction. Furthermore, siting the scheme closer to Little Staughton Airfield would appear to make significantly more sense given its proximity to existing solar schemes and the grid connection infrastructure. This would logically reduce the need for additional infrastructure and further concentration of development elsewhere. Given that the agricultural quality of the land is the same in both locations, I fail to see how the applicant's justification can be considered valid or consistent.	The site selection process did not treat the presence of Grade 2 agricultural land as an absolute exclusion criterion, nor were alternative areas rejected solely because they contained any Grade 2 land. Agricultural land quality was one of a number of factors assessed alongside proximity to the Eaton Socon Substation, environmental constraints, land availability, and the ability to accommodate a scheme of the required scale. In accordance with national policy the Applicant has sought to prefer lower-quality land where possible during the site identification process (as reported in ES Vol 2 Appendix 3-1 [APP-058]), before proceeding with the land identification for the Scheme reported in ES Vol 2 Appendix 3-2 [APP-059]. The Site that has been taken forward for the Scheme is as a result of the early optioneering work completed and reported in ES Vol 2 Appendix 3-2 Land Identification Report [APP-059]. The agricultural grade of land immediately surrounding an individual property does not demonstrate that the site selection exercise was inconsistent. The selected Site has been identified through a multi-criteria process, and the effects on agricultural land have subsequently been assessed using detailed, site-specific evidence.

2.15 Response to William Scurry

Table 17: Response to William Scurry Comments on D2 Submissions (REP3-110)

Our Ref.	William Scurry Comments	Applicant Response
WS-D3-01	The applicant states that “There would be a neutral or beneficial effect on on-site and off-site surface water flood risk” If the Applicant or their many experts really believe this, will they accept any future responsibility and therefore offer compensation to any buildings/property that floods after they start their building work and throughout the life of the development?	The Applicant’s position is that the liability and compensation for any potential damage to buildings/property as a result of floods caused exclusively by the implementation of the Scheme are private law matters. Appropriate remedies are available on private law to anyone with a relevant claim. The purpose of the DCO examination, and the scope of the Planning Act 2008 which falls within the realms of public law, is to assess whether the Scheme is acceptable in planning and environmental terms, including whether flood risk has been appropriately assessed and whether suitable mitigation measures are secured. The Planning Act 2008 regime does not require an applicant to provide a general indemnity or compensation scheme for all future flooding events. Rather, the relevant question for the Examining Authority and Secretary of State is whether the evidence demonstrates that the Scheme would not give rise to unacceptable flood risk and whether appropriate mitigation, design measures and management controls are secured through the DCO, which includes any other control documents. The Applicant’s assessment concludes that the Scheme would not increase off-site flood risk and that, with the proposed mitigation and controls in place, effects would be neutral or beneficial. The conclusion is therefore not that flooding could never occur, particularly during an extreme rainfall event, but that the development would not increase surface water flood risk and may reduce it. The Applicant understands that this position is not disputed by the Environment Agency or the Lead Local

Our Ref.	William Scurry Comments	Applicant Response
		Flood Authority, and that it is a commonly accepted approach for solar farm development on land currently in intensive agricultural use. If a specific flooding incident were alleged to have been caused by the authorised development, any question of liability would fall to be determined under the relevant legal framework applicable at that time, including principles of common law, statutory nuisance, negligence or other relevant causes of action. Those matters are separate from, and do not form part of, the planning merits of the application.

2.16 Response to Jillian Lane

Table 18: Response to Jillian Lane Response to ExQ1 / D2 Submissions (REP3-097)

Our Ref.	JL Ref.	JL Comments	Applicant Response
ExA First Written Questions			
JL-D3-01	Q1.8.3	This question relates to maintained roads and whilst it is welcomed, there is no reference to noise levels of traffic on unmade roads whether these are temporary or otherwise. I would therefore suggest it be extended to include these.	The Applicant has assessed noise and vibration from the construction and operational phase within ES Vol 1 Chapter 10 [APP-046] .
6.1 ES Vol 1 Chapter 10 Noise and Vibration P01			
JL-D3-02	-	I would suggest this study is extended to the boundary [redacted] on the opposite side of the B660 in Green End and closer to the hardcore, single-track road which is to be used for access to site A. The track runs the length of [redacted] boundary and the noise of HGVs and other construction traffic traversing the unmade, hardcore track for most of the day between 7 am to 6pm for 30 months should be anticipated.	The noise and vibration assessment [APP-046] assesses the impact at representative noise sensitive receptors (NSR). Each NSR therefore provides a reasonable worst-case proxy for other properties in the same locality that are at a similar or greater distance from the relevant source. Predicted noise levels have been calculated at each representative NSR, while noise contour modelling considers propagation across the wider surrounding area. Background noise was measured at 22 monitoring positions, including over weekend periods selected to capture the lowest likely background sound levels when road traffic was reduced. Noise impacts were then modelled and compared against those representative measured background and residual levels in accordance with BS 4142.
JL-D3-03	-	To include my property in the list on page 66 due to the proximity to Site A and to the access road. "Routing of plant and vehicles will be optimised to minimise noise at sensitive locations' – how will that work when temporary roads or unmade roads have already been designated?	The list of properties on page 66 [APP-046] sets out the noise sensitive receptors that were used for the assessment, which are identified as being representative of the nearest residential properties and representative of multiple properties where there

Our Ref.	JL Ref.	JL Comments	Applicant Response
			are clusters of buildings. The location of noise sensitive receptors are shown on ES Vol 3 Figure 10-1 [APP-148]. The reference to routing of plant and vehicles to minimise noise at sensitive locations related to the design of routes internal to the site between site compounds and work areas. Site access points and principal haulage routes have been defined and are not expected to change.
JL-D3-04	-	Also, to measure the sound from the existing Solar installation at Manor Farm, Pertenhall	The Applicant undertook background noise monitoring from a number of locations as shown on ES Vol 3 Figure 10-1 [APP-148]. This included monitoring location 5 which was reasonably proximate to the existing solar farm at Manor Farm, whilst also remaining representative in relation to noise sensitive receptors.

2.17 Response to Pauline McCafferty

Table 19: Response to Pauline McCafferty Response to ExQ1 (REP3-100)

Our Ref.	PM Ref.	PM Comments	Applicant Response
PM-D3-01	Q1.1.9	Where is the specific evacuation plan needed for the Health and Safety of residents and workers in case of a Battery fire. The procedures need to be well publicised so all parties are aware of procedures. Have the Fire Service been involved?	The outline Battery Safety Management Plan (oBSMP) [APP-162] sets out that an Emergency Response Plan would be prepared once the BESS has undergone detailed design, with paragraph 4.3.3 of the oBSMP setting the minimum requirements for the Emergency Response Plan. The Applicant has consulted with the fire service during the pre-application period, and has agreed a signed Statement of Common Ground with Cambridgeshire Fire and Rescue Service [PDA-019].
PM-D3-02	Q1.1.19	How many apprenticeships will be available? What will be the specific Recruitment and Retention processes to ensure workers are recruited in line with legal requirements and in particular to guard against the possibility of the employment of vulnerable workers being subjected to [redacted]? Where will up to 800 workers be accommodated? The proposed site is in a rural environment with little accommodation available.	The Applicant has outlined in the outline Skills Supply Chain and Employment Plan [APP-163] that it will facilitate the creation of apprenticeship positions in relevant trades to enable local and especially young people to earn and income and learn new skills on the Scheme. The specific quantity of apprenticeships available will be subject to detailed design, as this will determine the number of total employment opportunities available. All workforce procurement will be undertaken in accordance with the relevant laws and requirements in line with the Applicant's commitments to ethical and sustainable procurement, as detailed in the outline Skills Supply Chain and Employment Plan [APP-163]. The Applicant has provided an assessment of local accommodation at paragraphs 14.8.7-10 of ES Vol 1 Chapter 14 [APP-050]. This concludes that there would be no anticipated adverse effect on availability within the overall hotel, bed and

Our Ref.	PM Ref.	PM Comments	Applicant Response
			breakfast, and inn accommodation sector arising from the Scheme, and it is anticipated that accommodation providers would be able to accommodate employees working at the Scheme without any adverse effects on the sector.
PM-D3-03	Q1.62	Q1.62 Precisely who will be responsible for the maintenance of newly planted visual landscaping. There needs to be a clear statement on this as the experience of the A14 development between Huntingdon and Cambridge highlights the problems that can rise namely hundreds of trees planted and left to die. A huge wastage of money and an adverse impact on the environment.	The Applicant has prepared an outline Landscape and Ecological Management Plan [REP3-056] which sets out how the proposed landscaping will be implemented and managed through the lifetime of the Scheme. As set out in ES Vol 1 Chapter 2 [REP3-023], the Applicant expects that there would be 20 full time equivalent (FTE) roles for the Scheme during the operational phase covering the various activities, this would breakdown broadly as twelve FTE roles working on site maintenance, five FTE roles working in management and administrative roles, and three FTE roles working in land management including landscape maintenance and agriculture. The Applicant currently intends for the three roles supporting land management to be permanent positions directly employed by the Scheme to provide continuity in the management and maintenance of Scheme habitats, however this will be subject to review and the Applicant may seek to instruct a landscape and ecological contractor on a multi-year maintenance contract.
PM-D3-04	Q1.11.2	Why will construction work include all day Saturday. From a Health and Safety and the Well Being of local communities work should finish at lunch time at the latest. This would provide much needed respite for local communities from HGV thundering along quiet country lanes.	The proposed construction working hours on Saturdays are restricted to 08:00 to 13:00, as secured by Requirement 17 of the draft DCO [REP3-009] .
PM-D3-05	Q1.11.3	What will be the specific parking arrangements for up to 800 workers? How will this be controlled? By what methods will workers be compelled to use sustainable travel options and	Proposed measures for the management of on-site parking for construction staff and measures to prevent off-site parking are

Our Ref.	PM Ref.	PM Comments	Applicant Response
		what will be the consequences, penalties if they are non-compliant?	set out in Section 6.6 of the outline Construction Traffic Management Plan (oCTMP) [REP3-050] .
PM-D3-06	Q1.11.4	More specific information required on the methods of monitoring HGVs movements. How will it be monitored and enforced and by whom, bearing in mind that the Plans are for a number of sites across the proposed development? What will be the consequences and penalties for non-compliance. What measures will be used to ensure that no HGVs travel along the B645 through Kimbolton where a 1,000 pupils attend school every day including some on Saturday mornings. Also most of the housing along the Main Street are listed and some have no foundations as they are timber framed with lath and plaster which could be easily damaged by HGVs thundering past. Who will pay for the ongoing maintenance and repairs of the country roads damaged by the movement of HGVs during the construction phase? The council is already stretched trying to fill dangerous pot holes that have developed just by the use of light, local traffic	Proposed measures for the management and monitoring of HGV access to and from the Site are set out within Sections 6.1 and 9.1 of the oCTMP [REP3-050]. Details of the proposed Enforcement and Corrective Measures are set out in Section 9.3 of the oCTMP. Section 5.9 of the oCTMP sets out the Applicant's commitment to undertaking pre- and post-construction highway condition surveys, as well as regular interim monitoring during the construction phase, in conjunction with the Local Highway Authorities, in order to identify and remediate any defects resulting from construction traffic.

2.18 Response to Sara Jane Knightley

Table 20: Response to Sara Jane Knightley Response to ExQ1 (REP3-104)

Our Ref.	SJK Ref.	SJK Comments	Applicant Response
SJK-D3-01	Q1.1.3	Q1.1.3 the revised guidance from NFCC to BESS has been published and includes the need for a comprehensive risk management process leading to a robust battery safety management plan and emergency response plan. It also includes specific explosion control guidance. It is imperative that the Applicant has read and included this in their submission.	The Applicant can confirm that revised NFCC guidance was published in February 2026 and the oBSMP [APP-162] is fully compliant with the revised guidance.
SJK-D3-02	Q1.1.8	it is imperative that the Applicant has included adequate bunds in the scheme to ensure that any firewater does not contaminate the surrounding land.	The Applicant responded to this point with reference to Q1.1.8 in the Applicant Response to Examining Authority's First Written Questions [REP3-072] .
SJK-D3-03	Q1.1.9	400 meters separation from properties is not a considerable distance when the impact of an explosion is considered	The Applicant responded to this point with reference to Q1.1.9 in the Applicant Response to Examining Authority's First Written Questions [REP3-072] .
SJK-D3-04	Q1.1.10	surely the Applicant should be required to engage with the Police and Designing out Crime Officer? The risks from this type of develop leading to increased crime are well known and measures to reduce/prevent should be written into the Scheme.	The Applicant responded to this point with reference to Q1.1.10 in the Applicant Response to Examining Authority's First Written Questions [REP3-072] .
SJK-D3-05	Q1.1.11	The ExA has questioned how often the cyclical preplanned maintenance operations will take place. Surely the Applicant also needs to confirm that these extra traffic movements have been included in their calculations both for the impact on the roads and the resulting increased carbon emissions.	The GHG emissions associated with the cyclical pre-planned maintenance operations has not been calculated within ES Vol 2 Appendix 15-1 [REP2-021] or presented within ES Vol 1 [REP2-012] . This is due to the lack of information at this stage to support a reasonable and accurate calculation. Uncertainties include the frequency (6-12 months depending on the risk profile of the

Our Ref.	SJK Ref.	SJK Comments	Applicant Response
			equipment); the total distance of road the vehicles would cover; the type of vehicles used; and whether the cyclical pre-planned maintenance would be completed by the operational workers already on-site.
SJK-D3-06	Q1.1.16	The applicant proposes to use sheep to graze the grassland at certain times of the year. Where is the applicant proposing to get these sheep from and what will happen to them when they are not grazing the grassland? As the site is so enormous a lot of sheep will be required to keep the grass levels under control! Sheep cannot just be put out and left alone to graze - what measures has the Applicant got in place to monitor the sheep from a welfare point of view.	The outline Landscape and Ecological Management Plan [REP3-056] sets out at paragraph 6.5.44 that it would be the responsibility of tenant farmers to manage and monitor the sheep grazing, in co-ordination with the Landscape Manager. This includes the provision of all infrastructure required to graze the land. The Applicant has already had a number of expressions of interest from local livestock farmers and smallholders wishing to graze the solar panel areas, should the Scheme be consented. At this time, the Applicant sees no reason why these expressions of interest would not be followed up on, but does not have contracts in place.
SJK-D3-07	Q1.1.17	There is absolutely no doubt that human health will be adversely affected by this development. The applicant did not give this sufficient consideration during the consultation phase but must be required to consider and justify the considerable amount of harm that will be caused to residents well-being. NPS EN-1 recognises that energy infrastructure has the potential to impact on the health and well-being of the population. Applicants must assess the effects of each element of the project and identify any potential adverse health impacts and any measures to avoid, reduce or compensate for these impacts. NPPF promotes the preservation of healthy and safe communities and observes that access to a network of high quality open spaces is important for health and well-being of communities, Taking these away from residents over such a vast area must be considered.	The Applicant has assessed the impact of the Scheme on human health within Section 16.2 of ES Vol 1 Chapter 16 [APP-052]. This concludes there would not be likely significant effects on human health as a result of the Scheme.

Our Ref.	SJK Ref.	SJK Comments	Applicant Response
SJK-D3-08	Q1.1.21	Surely consent for this project cannot even be considered until the outcome of NESO's Connection Reforms process has been published.	The outcome of NESO's Connection Reform has been published in late 2025, and this confirmed the Scheme has a confirmed 'Gate 2' connection offer for the export of 400 MW of electricity generation to the National Grid at the Eaton Socon Substation.
SJK-D3-09	Q1.3.1	AS the Applicant currently has no funding secured for decommissioning how can substantial hedgerow planting (over 17km) be guaranteed?	The proposed planting is secured by Requirement 4 of the draft DCO [REP3-009] . The proposed planting is an embedded part of the Scheme development and must be delivered alongside other infrastructure during the construction phase. Funding of the construction of the Scheme will therefore include for all planting.
SJK-D3-10	Q1.3.3	The Applicant mentions mammal gates but does not give details of size or spacing. Mammals have specific routes they use to cross land it is imperative that the gates are placed across all of these routes – unfortunately mammals are not able to follow signs indicating the provision of mammal access routes!!!	Table 6 of the Design Parameters and Principles Statement [REP1-030] sets out that <i>"Small mammal gates will be provided at the base of the fence with maximum dimensions of 0.3m in height by 0.25m in width. A minimum of two small mammal gates will be provided to each fenced area."</i>
SJK-D3-11	Q1.7.2	The Applicant suggests that the proposed development count theoretically supply almost half all electricity that BCC and HDC collectively consume but source from non renewable generation. Surely if this is the case the supply from this development should be sold to BCC and HDC thereby at least giving some benefit to the communities that will suffer from this development?	The electricity generated by the Scheme will be supplied to National Grid's transmission network via the Eaton Socon Substation. Given the interconnected nature of the national grid it is not possible to specify that electricity would be specifically used in defined geographic area.
SJK-D3-12	Q1.7.4	Not only should the applicant be required to justify the size of the proposed development but why it has been proposed to go over four sites thereby increasing the overall spread of the development.	The Applicant has set out the approach to land identification within ES Vol 2 Appendix 3-2 [APP-059] , with the overall design approach summarised within the Design Approach Document [APP-034] . The Applicant has assessed the impacts of the full extent of the development within the submitted Environmental Statement.

Our Ref.	SJK Ref.	SJK Comments	Applicant Response
SJK-D3-13	Q1.11.3	The applicant suggests that construction staff would be encouraged to consider ways of travelling to site other than by individual private car. Encouraged is very different to required. Have the carbon emission calculations and traffic movement calculations assumed that shared transport would be used? If so then additional calculations should be shown assuming individual journeys are there appears to be no requirement to insist on shared/sustainable travel.	The calculations in ES Vol 1 Chapter 15 [REP2-012] do not rely on staff car sharing or shared transport. ES Vol 2 Appendix 15-1 [REP2-021] adopts a conservative assumption that, because the origin of construction workers is unknown, each construction worker would travel 50 km to the Site and return, and that each worker would travel individually by car. The carbon assessment therefore already reflects the scenario requested and no further sensitivity calculation is required. The Applicant considers this to be a reasonable worst-case scenario.
SJK-D3-14	Q1.1.15	not only should the impact on the A1/B645 junction be considered but also the impact on the northbound exit and southbound entrance to the A1 at Little Paxton	It is not proposed that any construction traffic would use the Little Paxton junctions with the A1.
SJK-D3-15	Q.1.12.5	Not only should the Applicant be required to prove that they have an adequate suitable and sustainable water supply in place not only for the construction but for any fire fighting needs, but they should also ensure that the cost in emissions and additional transport requirement have been included in their calculations	The greenhouse gas assessment at ES Vol 2 Appendix 15-1 [REP2-021] includes for water in the construction and operational phases.

2.19 Response to Shaun Woodward

Table 21: Response to Shaun Woodward Comments on D2 Submissions (REP3-105)

Our Ref.	SW Comments	Applicant Response
SW-D3-01	There are many statements within the draft DOC which end with phrases such as:- “as far as practical”, “where possible”, and “where viable” etc or words to this effect. I suggest these phrases are included to gain future flexibility beyond the granting of the DOC or and indicates that those points where these comments appear have not been firmly resolved as yet. I hope the inspector will require tightening of such points within the final DOC where possible to bring clarity to what might be granted, particularly with respect to traffic routing. If developers and constructors are allowed scope, I fear they could further seek to adjust their stated position at a later date, detrimental to the spirit of any granted permissions to the detriment of the landscape and the interests of local people affected by the scheme. For example: it is particularly important that detail plans for the BESS, traffic movements, routes to site, and timing of deliveries are tied down, firm and are totally unambiguous.	The Applicant does not accept that qualified terms such as “where practicable” provide unrestricted flexibility following the grant of a DCO. Such wording is used where an absolute obligation would be inappropriate because implementation may depend on matters such as detailed design, site conditions, safety requirements or circumstances arising during construction. The authorised development will be controlled through the articles set out in the draft DCO, together with the requirements and importantly, the certified documents. Where further detail is appropriately developed following consent, relevant plans must be prepared in substantial accordance with the approved outline documents and submitted to the relevant local authority for approval. Any material departure from the authorised development or secured controls would require the appropriate formal approval and could not be undertaken unilaterally by the Applicant. The Scheme cannot commence until the final detail set out in the final management plans is approved by the relevant local authorities.
SW-D3-02	Traffic rules variance - I read that large construction projects are able to seek variance of traffic weight limits and access limits for roads for the duration of a project if required. If so, does this mean variance could be sought for any traffic plan submitted by the applicant after the DOC is granted to include more local roads in the overall traffic access plan from that proposed now (which still has unresolved issues – eg route of South bound traffic leaving the site).	The final Construction Traffic Management Plan would be required to substantially accord with the outline Construction Traffic Management Plan [REP3-050] and other certified documents, including the identified access points, routing principles and measures for managing HGV movements. The Applicant could not unilaterally add further local roads or materially alter the approved routing strategy. Any proposed change would require approval by the relevant local authority,

Our Ref.	SW Comments	Applicant Response
		following consultation with the local highway authority, and would need to remain within the scope and assessed environmental effects of the authorised development.
SW-D3-03	Policing - I am very concerned that once granted the DOC will be insufficiently policed to be effective. I am unsure which body will have the resources and policing duties to oversee such a large project as East Park Energy over the 30 36mths of the initial construction and at the 20 year major renewal and the 40 year decommissioning stage. This should be firmly resolved in the DOC. The local authority have no budget or staff to do this at the level required for proper policing. Oversight should be thorough and independent.	The local planning authorities would be responsible for enforcement of the requirements of the DCO during the construction phase and beyond. The Applicant is consulting with the local authorities regarding cost recovery for the local authorities during the post-consent stage to ensure they have the resources required to monitor and enforce the DCO.
SW-D3-04	Unmonitored traffic movements - Once construction starts, I believe irrespective of any traffic plan, vehicles will be travelling in every direction on every local road using which is the easiest and shortest for them to access the site in order to save time and cost. It would be possible for workers who are likely to be billeted radially from the site, to use many unsuitable roads before accessing the main entrance.	Construction staff would be required to adhere to the measures set out within the outline Construction Traffic Management Plan oCTMP) [REP3-050] and the embedded outline Construction Workers Travel Plan (oCWTP). Measures to ensure the monitoring and compliance of the oCTMP and oCWTP are set out in Section 9.0 of the oCTMP.
SW-D3-05	Applicant responses to interested parties - Is it correct that in the NSIPs process that the applicant has no obligation to directly answer all questions fielded by residents, only questions asked by the inspectorate? I am unhappy that my last submissions were not fully answered, only points which I believe the developer felt were weak or could be defended. Surely the developer must respond to all rational sensible questions in WR's from all at the examination stage of the project, particularly those living closest to it whose properties are named in the application.	It is correct that the NSIP examination process does not impose a general obligation on an applicant to provide a separate answer to every question raised by every Interested Party. The examination is managed by the Examining Authority, which determines the principal issues, sets opportunities for parties to comment on submissions and may require the Applicant to answer written questions or provide further information. Written representations nevertheless form part of the examination evidence and are considered by the Examining Authority whether or not each point receives an individual Applicant response.

Our Ref.	SW Comments	Applicant Response
		The Applicant reviews submissions made by Interested Parties and seeks to respond proportionately to material matters concerning the Scheme. Where several parties raise the same or closely related issues, these may be addressed collectively or by reference to information already contained in the application documents or earlier submissions. The absence of a separate response to every sentence or question does not mean that the representation has been disregarded or that only points considered easy to answer have been selected. To avoid excessive repetition the Applicant is not responding to every representation made during the examination, instead making use of thematic responses where necessary to provide a response or additional information for the benefit of the examination.
SW-D3-06	lack of response to details in WR - In my previous WR I offered clear information relating to traffic volumes which in turn would affect greenhouse gas and carbon calculations. Over the life of the plant I calculated the number of traffic movements to be in excess of 700,000. This is a considerable figure if then included correctly within carbon calculations. The applicant states 12,146 movements for the 'construction' stage but it is vague as to the figures for stages beyond that.	GHG emissions for transport have been calculated throughout the lifetime of the Scheme (including construction, operation and decommissioning) within ES Vol 2 Appendix 15-1 [REP2-021]. The assessment calculates emissions by applying the number of trips required, the distance travelled per trip, and the relevant vehicle emission factor, including well-to-tank (WTT) emissions. The GHG emissions associated with transport have been calculated when the information supports a reasonable and accurate calculation. The following transport emissions have been calculated: Construction: • Transportation of equipment and construction materials to the Scheme • Travel of construction workers

Our Ref.	SW Comments	Applicant Response
		Operation • Travel of workers to site • Transportation of replacement equipment to Scheme • Transportation of replaced equipment to recycling and disposal Decommissioning • Transportation of waste materials • Travel of workers
SW-D3-07	Lack of breakdown for Diesel usage - There appears to be no breakdown of how the diesel figure quoted in the greenhouse gas calculations had been arrived at: For example which vehicles and generators are to be used on site, what fuel consumption is used and how many days each vehicle is projected to work. I request more detailed information on this aspect, or direction as to where it is in the application if I have missed it.	The diesel usage figure (864,000 L) within ES Vol 2 Appendix 15-1 [REP2-021] currently represents a preliminary assumption and will be reviewed and updated as part of the detailed design process, when more specific information on plant, vehicles, generators, fuel consumption, and programme duration becomes available. This would not materially change the conclusions of the ES.
SW-D3-08	Potentially understated GHG calcs - My overarching concern is that greenhouse gas calculations are understated for the whole life of the plant. When compared to energy created by gas how much saving does this solar scheme truly save? We believe the savings versus the carbon cost of building are potentially worse than using gas. Whilst probably all solar plants fall into this calculation it's important that we have accurate figures to judge the green credentials of this scheme. I request the applicant provide a more thorough cradle-to-grave carbon	The GHG emissions offset over the lifetime of the Scheme has been calculated using several comparators (including gas) in Table 15-16 in ES Vol 1 Chapter 15 [REP2-012]. It states 6,104,646 tCO₂e is offset over the lifetime. This value is much larger than the 681,329 tCO₂e calculated in ES Vol 2 Appendix 15-1 [REP2-021] and presented in ES Vol 1 Chapter 15 [REP2-012] and also the value calculated by SEPE's alternative

Our Ref.	SW Comments	Applicant Response
	calculation which is fully transparent for comparison with our own calculations which are ongoing.	analysis of 1,524,206 tCO₂e. Therefore, the Scheme will have a net GHG benefit. The Applicant recognises that the GHG assessments for NSIP solar schemes vary depending on the scope, assumptions, methodology, data sources and level of design maturity at the time the assessment is undertaken. At the current stage of development, prior to design freeze, where key equipment has not yet been selected, it is extremely difficult to calculate the GHG emissions associated with the Scheme with precision. The commitment to prepare a lifecycle carbon assessment will ensure that the most up-to-date methodology and data are used at the appropriate stage of the Scheme's development. This commitment will also maintain awareness of lifecycle emissions and support ongoing emissions reduction as the design progresses.
SW-D3-09	Temporary Status - My final point is that the like all the other NSIP's solar schemes that they have only 'Temporary' status and by definition, the landscape will return back to how it is now, after 40 years of solar. But the applicant suggests an enormous amount of screening and planting is required, which is required trying to mask clearly unsuitable placement of many solar arrays. This is particularly evident around footpaths and rights of way where fences and screening are proposed across crop fields on a vast scale. My point is that if the site is to be returned to its pre-scheme state as defined by the 'Temporary' status of the planning, all the planting, fencing and hedging will need to be removed which will be damaging to wildlife, but if not removed after 40 years will have totally changed the nature of the current open rolling landscape. It can't on this basis be regarded as 'Temporary'. I would like clarification that all hedges,	The Applicant is proposing that all proposed planting will be retained upon decommissioning and handed back to the landowners. The Applicant has consulted with landowners through the design development to ensure that proposed planting is consistent with their future land management requirements, including for arable farming if necessary. The proposed planting has been designed to be consistent with the established landscape character guidelines for the local area. The proposed planting will at the time of decommissioning form a beneficial and established part of the landscape and ecological network whereby its removal would cause unnecessary harm. The Scheme is rightly considered as temporary because the energy infrastructure and associated operational use would cease and be removed at decommissioning.

Our Ref.	SW Comments	Applicant Response
	planting, fencing and specially constructed roads for movement about the site and associated materials will be removed after 40+ years. Without this hedges and fencing, and new access roads will interfere with arable farming machinery.	

