EAST PARK ENERGY

East Park Energy

EN010141

Applicant's Response to Deadline 4 and 5 Submissions – Other Interested Parties

Document Reference: EN010141/DR/8.70

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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 the Deadline 4 and 5 submissions submitted by Other 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 4 or 5, this response document sets out that the relevant updated document is "**[as updated alongside this submission]**".

1.1.3 The Applicant previously submitted the **Applicant Response to Deadline 4 Submissions [EN010141/DR/8.63]** which provided thematic responses to selected matters raised by interested parties at Examination Deadline 4.

1.1.4 In preparing this document, the Applicant has sought, where practicable, to avoid repeating points addressed in its previous submissions. The Applicant has therefore responded only to substantive points, in particular where it considers that matters set out in the Application have been misunderstood or misinterpreted, where clarification or additional information has been requested, or where a point of disagreement has been raised that may not have been addressed in the Applicant's previous written submissions. Where the same or a substantially similar point has been raised by multiple Interested Parties, the Applicant has not necessarily provided a separate response to each party.

1.1.5 Accordingly, whilst the Applicant has considered all submissions made at Deadlines 4 and 5, 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 DEADLINE 4 SUBMISSIONS

2.1 Response to British Horse Society – Bedfordshire and BOBLAF

Table 1: Response to [REP4-044]

Our Ref.	Comment	Applicant Response
BHSB-D5-01	I have attached to this submission an appendix that captures six of the presented photographs and photomontages in respect of VP12 so that they can be compared more easily. This VP is described as on FP34 but it is also on BW37, roughly mid-way along the ridge line part of that bridleway. You will see that the current view to the north (7 degrees) is of distant views towards Swineshead and that these are replaced, initially with views of panels, and ultimately with trees (and in winter, the panels will be visible through these trees). It is accepted that the views to the south are not obstructed but those to the north are completely obliterated. The views to the west will also be dominated by panels initially and then eventually by trees. In REP3-033 in the summary of effects (Table 18.2, page 18-10) – the magnitude of this effect in year 10 is described as "medium" and the residual effect as "moderate adverse, not significant"– how can this be when one of the major attractions of the route is the far-reaching views which will be lost? We consider the impact to be very high, major adverse and significant.	The Applicant has addressed the visual impact at Viewpoint 12 in Appendix C of the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) and Action Points [REP4-110]**. In addition, the Applicant's assessment from this viewpoint is set out in **ES Vol Appendix 5-4 [APP-072]**. The Applicant does not agree that the visual effect at Viewpoint 12 has been understated. The Landscape and Visual Impact Assessment assesses the change experienced by users of the route in accordance with the methodology in **ES Vol 2 Appendix 5-1 [APP-069]**, taking account of receptor sensitivity, the scale and extent of change, duration, reversibility and the retained components of the view. The Applicant notes that far-reaching and panoramic views out across the Kym valley to the east will remain open, but the views to the west will ultimately be screened from this section of the bridleway.
BHSB-D5-02	The BHS starting point on this is that it is unacceptable to use a bridleway for construction access unless unavoidable, in which case an alternative safe off road route should be provided.	The Applicant has previously responded with regard safety along the bridleway in Table 1 of **Applicant Response to Deadline 2 Submissions - Other Interested Parties [REP3-074]**.

Our Ref.	Comment	Applicant Response
	In the BHS WR (REP1-099) I identified that the risks to riders and horses arise from four sources: • Proximity of HGVs and other vehicles • Pinch points in the farmyard with a deep ditch alongside • Noise of construction - pile driving in particular - alongside • Noise and activity related to the cable laying along nearly a mile of bridleway At the hearing today, the Applicant focussed only on the first of these and did not address the other three. I acknowledge that the changes made to the oPROWMP in the last iteration, REP3-058, do largely address my concerns in respect of HGV traffic. However, there are some places along the track where visibility of oncoming horses may be restricted, even from the elevated position of an HGV driver. For example, a horse approaching BW37 from BW40 in either direction may not be seen until the vehicle is closer than 50/100m away. I would therefore suggest a 5mph speed limit for HGVs and other large vehicles on the bridleway. The BHS accepts that operational traffic will be at a level not significantly different from existing agricultural traffic and has not raised any objection of that aspect.	The Applicant can however offer a recent update with regard a temporary construction phase diversion of Bridleway 37 and Bridleway 26 that has now finally been agreed with the relevant landowner. The Applicant has secured a temporary diversion as shown on **Figure 2** in the updated **outline Public Rights of Way Management Plan [as updated alongside this submission].** This temporary diversion will be provided for as long as construction phase works are happening that would affect the relevant PRoW. The approach to delivering temporary diversions is set out at paragraphs 5.1.4 to 5.1.8 as well as paragraph 5.1.14 of the **oPROWMP [as updated alongside this submission]**. Whilst the Applicant maintains its previous position that the safety measures proposed for the bridleway are adequate to ensure PRoW user safety, the Applicant also acknowledges the request for this temporary diversion, which is secured by Requirement 11 of the **draft DCO [EN010141/DR/3.1]**.
BHSB-D5-03	I acknowledge that most horseriders in the area have other options to ride and will, in all likelihood, avoid these routes during construction (18 months for Site A) and indeed during any refit and decommissioning if they can. The dangers associated with two pinch points on Bridleway 26 in and near the Manor Farm farmyard are perhaps of a lesser concern than the dangers on BW37/40 because Pertenhall riders would	

Our Ref.	Comment	Applicant Response
	have the option to ride across towards Swineshead Woods and beyond, mostly on off-road routes. But nonetheless, the current proposals are tantamount to closing this bridleway for the duration of construction - which is contrary to EN-3. But horse owners in Brook End do not have the option to use alternative bridleways, without significant roadwork. Such riders will use BW40 to reach BW37 and then either turn west along BW37 or go ahead on BW40 towards Swineshead (and, in either case, their return route would involve these bridleways again). They would be exposed to the loud and percussive noises of the pile-driving required for the installation of the panels, to the noises of HGVs being unloaded and materials moved around on the site and many other potentially disturbing noises. There will also be noise and movements related to the cabling along part of BW37, in particular at the BW37/40 junction. There are not many riders affected, but they include the disabled boy I have previously described (and mentioned by Cllr [redacted]) and his mum. I don't know if you are a parent, but would you be happy to take [redacted] on his pony past this work? Or to do about 2km on the increasingly busy roads, in order to do a circuit away from the work? They will not be able to ride out in confidence for 18 months, except maybe on Saturday afternoon and Sundays – so summer after-school riding will be lost for possibly two summers. The recent changes to the oPROWMP and oCEMP, whilst well-intentioned, do not go far enough to address the BHS concerns.	

Our Ref.	Comment	Applicant Response
BHSB-D5-04	The oPROWMP clarifies that the banksman at the BW37/40 crossing will be deployed only when there is activity in the immediate vicinity of the crossing. So, for much of the time, there will be no banksman to raise the awareness of the workers to pause or reduce work in the presence of equestrians as required by the oCEMP. The oCEMP remains unchanged in this respect and remains not credible in our view. • It is not possible for a user who approaches the site from the west (so via VP9) to be seen by anyone for most of the length of the route next to the arrays • If the banksman at the crossing is only there when work is ongoing close to the crossing, then horses will not be seen at other times even if there is work going on adjacent to BW37 • It may be argued that the banksman at BW26 can sound the alarm about horses coming up the bridleway from the farmyard but horses approaching from north or south on BW40 will not be seen (indeed even when the banksman is in position they will not be seen until very close) • So it is not credible that this system will work for any horses arriving at the site from the north, south or west. The oCEMP requires (Table 5.6 of REP3-048) that the Prinicipal Contractor will give instructions to pause or reduce non-essential noisy activities (particularly impulsive or intermittent sources) until the equestrian user has cleared the immediate works interface, applying best practicable measures in accordance with BS 5228. This approach is just not credible. How is the Principal Contractor going to be able to achieve this? Firstly, because the horse will in all probability not be seen and secondly, even if it is, how can this	The Applicant considers that the temporary diversion set out in the row above resolves the concern about the banksman at the BW37/40 crossing. Nonetheless, the Applicant is still committed to providing a banksman, and has provided greater clarity at paragraph 6.9.3 of the **oPROWMP [as updated alongside this submission]** about when a banksman will be in place.

Our Ref.	Comment	Applicant Response
	be communicated and acted upon in the moments between when a horse is spotted and the horse is alongside the noise source?	
BHSB-D5-05	I have tried to be constructive and suggest a safe off road route that could be offered. See BHS Beds WR (REP1-099). I am not tied to this alternative route, but I have demonstrated that such a safe route could be provided with goodwill on the part of the applicant and the landowner. It is mostly outside the red line but is in common ownership with much of Site A (possibly all of it). Another option, if an alternative safe diversion cannot be provided, would be to remove the panels from the section alongside BW37. This has already been suggested by Bolnhurst & Keysoe Parish Council to address visibility issues (REP-128). It would then be possible for construction traffic to reach all the panels through the site, without using the BW to the west of Manor Farm, bar one short section to access the panels closest to the B660. Some safety measures would be required when work was going on very close to BW40, but this should be a for a short time only.	As set out in the Applicant's responses above to BHSB-D5-02 to BHSB-D5-06, a temporary diversion has now been agreed.
BHSB-D5-06	Mitigation and Enhancement The host authorities drew your attention to the various provisions of the National Policy (in EN-1 and EN-3) for the requirement firstly to minimise the visual impacts and secondly to maximise opportunities to facilitate enhancements to PRoW and the adoption of new PRoW. (See also p5-8 of the ES - APP-041). It is our view that the applicant's proposals do not achieve either of these objectives and so fail to comply with National, as well as local, policy.	In addition to retaining the existing PRoW network, the Scheme will provide approximately 5.3 km of new permissive access for the operational lifetime of the Scheme. This includes a 2.35 km, 4 m-wide route available for equestrian use between the B660 Kimbolton Road and Green End, Little Staughton, together with additional pedestrian connections and a circular recreational route within Site C. The Applicant therefore does not accept that the Scheme has failed to provide meaningful enhancement to public access or connectivity. The policy requirement in paragraph 2.10.44 of NPS EN-3 is to consider and maximise opportunities for enhancement, taking account, where appropriate, of the views of landowners. It does not require an applicant to provide every conceivable opportunity or to
BHSB-D5-07	Neither BOBLAF nor BHS considers the mitigation/enhancement offered is sufficient to compensate for the significant adverse impact on the PRoWs, particularly on views and on enjoyment of	

Our Ref.	Comment	Applicant Response
	the existing routes, let alone to provide enhancement of the network. I do however acknowledge that an upgrade of footpaths to bridleway in Site B creates a very helpful, but permissive, equestrian link between two roads – 2.35km. I stress that this is an upgrade not new PRoWs and will not be of any benefit to walkers. Table 2 on p49 of the oLEMP (REP3-056) shows that the only true new access that is being provided is under 3km of permissive footpath. Is 3km of additional access in a site of this scale and impact, really appropriate mitigation? We think not and have made several suggestions for further access opportunities – including further new footpaths and the upgrade of the proposed loop near Great Staughton to bridleway, connecting to the nearby to Hail Weston BW112/7– and the host authorities not only support these but have made further requests.	deliver a wider strategic network regardless of landownership, environmental constraints or deliverability. The Applicant is not seeking compulsory acquisition powers over the landowners of Sites A to D. New permissive or permanent access rights over that land cannot therefore be imposed by the Applicant and require the agreement of the relevant landowner. The permissive paths constitute an additional recreational benefit, although the Applicant has consistently acknowledged that this should only attract limited positive weight.
BHSB-D5-08	The proposed additional routes and upgrades are to be permissive paths. We consider this inadequate – permanent adverse impacts deserve permanent mitigation. These routes should be dedicated so that they remain available to the public for the long-term and so that they cannot be closed without the agreement of the host authority. If they are not dedicated, they are not PROWs – as there is no Right of Way – they are merely Permissive paths. The oLEMP (p50 of REP3-056) envisages that these routes might be temporarily or permanently closed in the event of anti-social	

Our Ref.	Comment	Applicant Response
	behaviour. This closure does not require the agreement of the highways authority, as it would for a dedicated right of way, but is at the discretion of the operator. We don't consider this appropriate as it means that the mitigation or enhancement offered by these new routes may be removed.	

2.2 Response to Christopher Faulkner

Table 2: Response to [REP4-048]

Our Ref.	Comment	Applicant Response
CL-D5-01	I respectfully state that the panels proposed for the ridgeline north of the Bolnhust and Keysoe Bridleway 37 are on the top of the ridge line. I acknowledge the fact that, following the initial consultation, the applicant moved the panels back from the bridleway in a northerly direction by about 50m. However the top of the ridgeline is relatively flat, so this change will have made very little difference. The panels will be seen from many miles in both an easterly and southerly direction, and in addition they will create a new ridgeline when viewed from Mill Hill (B660) and church road in Keysoe, as well as from the historic church of Saint Mary's in. Thus, I believe this area of proposed panels is breaching the principle stated in section 2.2.	The Applicant does not agree that the Scheme will create an unacceptable new ridgeline. The layout has been refined by setting development back from BW37 and avoiding solar development on its south-east side, thereby retaining open views across the Kym Valley. The LVIA has assessed views from BW37, Mill Hill, Keysoe and the surrounding landscape, including effects on the setting of heritage assets where relevant.
CL-D5-02	I ask why the applicant has chosen the proposed development in an area with such a high density of public rights of way? The sheer number of bridleways and footpaths in the area of Norh Bedfordshire is one of the outstanding qualities of the area and offers unrivalled opportunities to walk freely and joyfully in beautiful open countryside. I understand that this area has one of the highest densities of public rights of away in the UK and this surely makes it an inappropriate location to locate such a huge solar farm.	PRoW were considered as part of the site selection exercise and the subsequent iterative design process, but it is not a policy or environmental exclusion criterion. It had to be balanced with the fixed grid connection, agricultural land quality, landscape, heritage, ecology, flood risk, topography, access, existing utilities and deliverability. This was considered at Issue Specific Hearing 3 as set out in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) and Action Points [REP4-110]**, including at Hearing Action Point 1 of that document.
CL-D5-03	I ask the applicant to commit to using not tree whips at 18 inches but more established planting, for example 4ft saplings. I have researched this with a number of the leading UK growers, and they have all confirmed that they grow at circa 30cm per annum so an order placed before the build commences would ensure saplings of at least 1m or more. So, saplings are readily available if planned for	This was considered at Issue Specific Hearing 3 as set out in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) and Action Points [REP4-110]**, including at Hearing Action Point 9 of that document.

Our Ref.	Comment	Applicant Response
	and should be treated as part of the cost of the application and should be ordered in the expectation of getting permission or at the very worst immediately on the granting of a DCO.	

2.3 Response to Emma Glass

Table 3: Response to [REP4-054]

Our Ref.	Comment	Applicant Response
EG-D5-01	An alternative route has been identified from Bushmead Crossroads to connect with the adjacent solar farm currently under construction near Staploe on the Bushmead road by Pathfinder Clean Energy. It is understood that this option would result in significantly less disruption, would have minimal impact on Public Rights of Way (PRoW), and would affect very few residential properties. The land required for this alternative route is understood to be owned by [redacted], one of the landowners associated with EPE. However, it has been suggested that this option was not pursued because the landforms part of a private shooting estate.	The Applicant is not proposing the use of Bushmead Road for access, other than a crossing along the alignment of the grid connection to the north of the Eaton Socon Substation.

2.4 Response to Jillian Lane

Table 4: Response to [REP4-057]

Our Ref.	Comment	Applicant Response
JL-D5-01	Parity of Importance for Local Footpaths vs. National Trails The Applicant sought to minimise the project's impacts by highlighting that no designated National Trails would be physically disrupted by the scheme. This distinction is arbitrary from an amenity perspective. Whether a path is a designated national trail, or a localised right of way used by residents from the immediate and surrounding areas, it provides the exact same physical and mental health amenities. Local paths must be accorded the same weight and level of environmental protection as national routes.	The Applicant does not suggest that local public rights of way are not important, or that their recreational and health benefits are dependent upon national designation. All public rights of way potentially affected by the Scheme have been considered within the ES, including effects on their accessibility and visual amenity. The Applicant's point related to the value or sensitivity assigned, in visual receptor terms, to different types of public rights of way. National Trails are nationally designated and promoted long-distance routes and are generally attributed a higher landscape and visual value because of their recognised importance, wider catchment, recreational function and the expectations of users. However, this does not mean that all local routes are treated as having low value or sensitivity. The value and susceptibility of each route and its users have been assessed in ES Vol 1 Chapter 5 [REP4-008] having regard to its particular characteristics, including its location, surrounding landscape, scenic quality, recreational function, level and nature of use, and any association with promoted or long-distance routes. Local public rights of way may have a high sensitivity where justified by their particular context and users' experience.
JL-D5-02	The Applicant conspicuously failed to answer direct questions from the Examiners regarding the implementation of early planting strategies. They similarly evaded suggestions to utilise more mature plant stock to accelerate visual screening and growth.	This was considered at Issue Specific Hearing 3 as set out in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) and Action Points [REP4-110]**, including at Hearing Action Point 9 and paragraph 2.2.16 of that document. As set out in the **outline Landscape and Ecological Management Plan [REP4-101]**, the planting stock for proposed native woodland,
JL-D5-03	The Applicant failed to confirm whether native species would be strictly utilised across the site. However, they explicitly conceded	

Our Ref.	Comment	Applicant Response
	that the sheer volume of plants required creates substantial sourcing and cost challenges. This admission signals that the Applicant intends to rely on cheap, small tree whips and a prolonged, phased planting schedule to meet their numbers. This approach guarantees that effective visual screening will not be achieved for many years, leaving the community exposed to severe visual blight in the interim.	native hedgerows and individual native trees would be of certified local provenance from seed zone 402, subject to availability. Stock from immediately adjacent seed zones 401, 403 and 406 is also identified as suitable, both to provide an appropriate local provenance and to support resilience to potential climate-related effects. The final LEMP will confirm the detailed planting specification including species, provenance, stock size, planting method and establishment requirements. Planting stock will also be required to be healthy and viable and to comply with the relevant British Standard for nursery stock and applicable plant handling requirements.

2.5 Response to Mark York

Table 5: Response to [REP4-061]

Our Ref.	Comment	Applicant Response
MY-D5-01	The issues I raised at the Open Floor Hearing on March 17th, 2026, and provided in a written contribution dated March 18th, have not been dealt with. The level of solar irradiation is much too low for any such scheme. Placing it on good quality agricultural land in a country heavily - and increasingly - reliant on food imports is foolish.	The Applicant provided a response in relation to solar irradiation and the 'capacity factor' used for the Scheme with reference to paragraphs 2.2.1 to 2.2.6 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**.

2.6 Response to M Benford

Table 6 Response to [REP4-063]

Our Ref.	Comment	Applicant Response
MB-D5-01	This submission concerns an unresolved action point from the first Open Floor Hearing on 17 March 2026, relating to the impact of construction traffic on the school transport service for children travelling from Great Staughton and surrounding villages to senior school in St Neots. The Examining Authority's own closing action points at that hearing directed that this matter be taken away for consideration, including whether the relevant traffic management provisions should become a firm DCO requirement. No resolution of this point appears in the Transport Assessment or in the hearings examined since. The attached document sets out the position and asks the Examining Authority to confirm whether the action point has been closed out, and if not, to require a substantive response from the Applicant before the close of examination.	The Applicant has provided a response to this matter at paragraphs 2.2.51 to 2.2.56 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**. The Scheme's construction traffic strategy has been specifically designed to minimise interaction with local settlements and school transport routes. HGVs would be directed to the Site from the A1 via the B645 and would then use the prescribed construction accesses and internal haul-road network. The internal haul roads would allow construction traffic to move between the different parts of the Scheme without travelling through Great Staughton, Little Staughton, Keysoe, Pertenhall or along unsuitable sections of the B645, B660 and B661 in the vicinity of Kimbolton. The Applicant is proposing that construction deliveries would be coordinated to avoid the conventional highway peak periods of 08:00–09:00 and 17:00–18:00. Construction staff movements are expected principally to occur before and after those periods. Consequently, the highest levels of construction traffic would not coincide directly with the busiest school and commuter periods. The **outline Operational Environmental Management Plan [REP4-097]** includes a commitment in Table 5.5 that operational phase traffic will be scheduled to avoid highway network peak hours and school drop-off and pick-up periods on school days. The relevant school drop-off and pick-up periods will be confirmed in the final OEMP, having regard to the operating hours of Great Staughton Primary School and any relevant advice from the local highway authority.

2.7 Response to Peter Mills

Table 7: Response to [REP4-069]

Our Ref.	Comment	Applicant Response
PM-D5-01	Mass flooding that is likely to run off the fields as the ground is covered over 1900 acres encompassing steep hills and dips with umbrella like structures (panels proposed to cover the ground).What are the calculated volumes of water expected particularly at peak rainfall/snow periods, as part of applicants assessment and how will this be discharged and flooding avoided ?	The issue of Flood risk and drainage from the Scheme has been robustly assessed through **ES Vol 1 Chapter 8 [REP4-010],** the **Flood Risk Assessment [REP4-017]** and the **outline Surface Water Management Plan [REP3-064]**. The majority of the Scheme lies within Flood Zone 1, and only limited development is proposed in areas of Flood Zones 2 and 3 (associated with local watercourses). Critical infrastructure would be located outside those areas at higher risk of flooding wherever practicable, appropriate stand-offs would be maintained from watercourses, and panels in areas of surface-water risk would be raised above the modelled flood level. Post-development hydraulic modelling shows that the panel supports would not materially obstruct flows or displace floodwater, with changes in modelled flood depth generally less than approximately 0.01 m across most of the Site. The Applicant notes that the solar arrays would not create extensive impermeable areas. Rainwater would continue to drain onto the vegetated ground beneath and between the panels, while the change from arable cultivation to managed grassland is expected to improve ground cover and infiltration. Runoff from panelled areas is therefore expected to remain at greenfield rates. Formal SuDS would be provided for the BESS, substation, compounds, access tracks and other hardstanding. These systems would attenuate runoff within swales and detention basins and restrict discharge to the relevant greenfield runoff rate.
PM-D5-02	How will the current limited drainage of ditches encompass any increase in water, as flooding exists already in the area with closed roads into villages, what is the plan to mitigate this getting much worse..see my pics loaded under comments on the inspectorate portal for examples where large ditches flow into culverts of much smaller ditches and already flood, or are damaging the already poor road surface, risk in winter particularly ?	

Our Ref.	Comment	Applicant Response
		Following consultation with the Lead Local Flood Authority (LLFA), the drainage calculations were updated to apply the 40% upper-end climate-change allowance. The wider pluvial modelling also uses projections aligned with the 2070s climate epoch for the 3.3% and 1% annual exceedance probability events. The assessment has shown the drainage to be appropriate even in t extreme / future weather events. The final drainage details, including storage volumes, flow controls and discharge rates, would be approved through the final Surface Water Management Plan under the DCO requirements. The Applicant's position is that the Scheme would not increase flood risk on or off-site and would result in neutral, or in some circumstances minor beneficial, effects.
PM-D5-03	Access site point at Green end in Little Staughton (see pics in my objection), how can this be a sensible place on a bend right next to houses in Little Staughton be the right place, dangerous as on a bend and widening the road to accommodate will impact the village character and residents with volume of traffic crossing the road or queued up . Surely must be better places for it to be cited in many straighter bits of road and away from residents ?	Access SA09 has been used as it is the existing operational access to the fields in question, and there was no better alternative access identified. The **oCTMP [REP4-095]** includes a series of drawings, in Appendix D, showing the site access drawings and the associated temporary speed limit and traffic management measures that are set out within Articles 12, 17 and Schedule 8 of the draft DCO. Junction visibility splays are indicated that correspond to either the posted speed limit or observed design speeds, and the reduced temporary speed limits that are proposed at the majority of the site accesses. The proposed access has been demonstrated through the Applicant's **Transport Assessment [REP4-019]** to be safe.
PM-D5-04	What damage will be done when putting all the access points in to get this construction completed, how big will the access points be and what level of hedge. Tree screening will be damaged for all site access points, also what limitation on signs that are likely to be there for 3 years will be put in place?	The **oCTMP** [**REP4-095**] includes a series of drawings, in Appendix D, showing the site access drawings. The required vegetation clearance is best shown on **ES Vol 3 Figure 2-6 Indicative Vegetation Clearance [APP-126]**, supported by the description in Table 2-34 of **ES Vol 1 Chapter 2**

Our Ref.	Comment	Applicant Response
PM-D5-05	What level of hedge and tree removal is planned to achieve this development, where is the overall assessment of the impact to wildlife/villagers and visual appearance been made. What will happen to gaps within hedgerow is there are planting statement if removal is needed or damaged, rather than a sea of panels as far as the eye can see ? A timebound plan that happens at set points during construction not at the end of the project when it could get overlooked	**[APP-038]**. A Tree Impacts Plan is also provided as part of **ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [APP-056]**. Mitigation measures to control impacts such as signage at access points are set out in the **oCTMP [REP4-095]**.

2.8 Response to Richard Finston

Table 8: Response to [REP4-073]

Our Ref.	Comment	Applicant Response
RFi-D5-01	At the ISH3 the applicant said they had not yet reached a decision as to the proposed mix of tree and hedgerow species that would be planted. I would like them to decide this now, and confirm that the species used will only be species native to this area, and will be sourced as locally as possible and as a minimum from British nurseries to avoid the risk of importing pests and disease. Local broadleaf species are likely to do best in this situation, to fit in with what will remain of the landscape and to be of most use to any local fauna. I believe this should be a condition of any permission granted.	This was considered at Issue Specific Hearing 3 as set out in the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) and Action Points [REP4-110]**, including at Hearing Action Point 9 and paragraph 2.2.16 of that document. As set out in the **outline Landscape and Ecological Management Plan [REP4-101]**, the planting stock for proposed native woodland, native hedgerows and individual native trees would be of certified local provenance from seed zone 402, subject to availability. Stock from immediately adjacent seed zones 401, 403 and 406 is also identified as suitable, both to provide an appropriate local provenance and to support resilience to potential climate-related effects. The final LEMP will confirm the detailed planting specification including species, provenance, stock size, planting method and establishment requirements. Planting stock will also be required to be healthy and viable and to comply with the relevant British Standard for nursery stock and applicable plant handling requirements.

2.9 Response to Richard Fuller MP

Table 9: Response to [REP4-074]

Our Ref.	Comment	Applicant Response
RF-D5-01	**Financial Viability and Security of Decommissioning** The applicant's funding statement fails to provide a clear, legally binding framework or an indicative funding structure for site restoration at the end of its operational lifespan. Instead, it relies on a vague commitment to "seek further funding." This absence of stewardship responsibility on the part of the applicant represents an unacceptable level of risk to my constituents that their local environment will be blighted by stranded assets of no economic value. Furthermore, because UK large-scale solar construction only began around 2013, no domestic site has yet reached decommissioning to prove that the applicant's assumptions are viable. International cases highlight a significant risk of site abandonment when financial security is absent.	The Applicant has provided a response to this matter at paragraphs 2.2.43 to 2.2.47 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**.
RF-D5-02	**Battery Energy Storage System (BESS) and Solar Arbitrage** The applicant's claimed public benefit from this project rests on its contribution to national green energy generation. However, the co-located BESS features both import and export capabilities without any restrictive framework in the draft DCO The BESS could autonomously grid-charge using fossil-fuel-generated power during cheap periods and discharge during peak times purely for financial arbitrage, detached from the solar plant's output.	The Applicant has provided a response to this matter at paragraphs 2.2.45 to 2.2.52 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**. The BESS has no confirmed import connection, and it would only operate as part of the co-located solar generation.

Our Ref.	Comment	Applicant Response
RF-D5-03	**Financial Security for Gas Pipeline Damage** A high-pressure gas transmission pipeline runs in proximity to the proposed BESS compound. Damage to this critical infrastructure would result in substantial repair costs The applicant has so far resisted providing financial security, relying on risk mitigation, standard insurance, and unbacked indemnities, all of which could prove ineffective if the developer faces insolvency following pipeline damage.	The National Gas pipeline has been identified and designed around with a design buffer agreed with National Gas. The Applicant has included draft protective provisions for the benefit of National Gas within the **draft DCO [REP5-005]**, and is continuing to engage with National Gas about the final protective provisions.

2.10 Response to Shaun Woodward

2.10.1 The Applicant has responded to the substantive points raised by Mr Woodward in Table 10, below. Where comments have been made which reflect points raised in BBC's Deadline 4 submission **[REP4-031]** and / or Stop East Park Energy's Deadline 4 submission **[REP4-082]**, the Applicant has not repeated those responses, in order to avoid unnecessary repetition and maintain brevity.

Table 10: Response to [REP4-077]

Our Ref.	Comment	Applicant Response
*The **Technical Note on Replacement Works [REP3-075]** has been incorporated into the Environmental Statement and is now included as **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2]**. Several modifications have been made to the original technical note to incorporate feedback from BBC and other interested parties. References below to the **Technical Note on Replacement Works [REP3-075]** should be interpreted in light of these changes.*		
SW-D5-01	Mr Woodward questions whether the replacement of fencing has been adequately considered, including concerns relating to how vegetation may be affected by fencing replacement works.	Paragraphs 2.3.55-2.3.56 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2]** set out that fencing would be inspected and maintained, with isolated sections repaired or replaced in response to damage, localised corrosion, vandalism, weather events or vegetation pressure. Such works would be localised and condition-led rather than a planned wholesale campaign. Any interaction with established planting would remain subject to the approved LEMP. Section 3.11 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2]** confirms that **ES Vol 2 Appendix 15-1 Greenhouse Gas Emissions Assessment [REP2-021]** includes replacement of solar modules, transformers, inverters, batteries and

Our Ref.	Comment	Applicant Response
		fencing, including manufacture, transport to the Scheme and disposal and transport of removed equipment. The Applicant does not consider there is a need to update the assessment.
SW-D5-02	Mr Woodward questions the assumption that the BESS units would require only one replacement during the 40-year operational period.	The Applicant refers to its response to BBC-D5-78 in the separate **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]** and to SEPE Point 4. **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] adopts the reasonable assumption that all battery storage units would be replaced once during the operational phase. It remains possible that an individual module, rack or unit could require additional repair or replacement following a fault or abnormal event. However, this is not considered likely, and the impact of any such isolated replacement has been considered as part of the assessment work undertaken in relation to replacement works. Paragraphs 2.3.37-2.3.43 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] explain that the BESS is modular and can be maintained, isolated and renewed on a unit-by-unit basis. The sensitivity assessment considers the unlikely scenario in which all BESS units and battery transformers are replaced within a single year. Those movements would be confined to the B645 between the A1 and Site D, and the **oOEMP [as updated alongside this submission]** limits delivery of replacement BESS units to no more than one unit on any working day.
SW-D5-03	Mr Woodward questions if the potential cabling replacement has been adequately assessed, accounting for the associated fault-finding, workforce, traffic and GHG effects. He suggests that the carbon effects of all replacement works should be itemised.	Table 1 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] assumes that up to 20% of cabling could require replacement over the operational life due to defects, but paragraphs 2.3.51-2.3.54 explain that any intervention would be

Our Ref.	Comment	Applicant Response
		localised and targeted in response to a specific fault, damage, water ingress or underperformance. Inter-panel cabling would largely be above ground and attached to the panels. Buried cables would typically be ducted, allowing a defective cable to be pulled out and replaced without significant excavation. Works would be undertaken by a small team, with cable and equipment distributed by van. There would therefore be no continuous planned programme involving replacement of cables. Section 3.11 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] cross-refers to **ES Vol 2 Appendix 15-1 Greenhouse Gas Emissions Assessment [REP2-021]**. The Applicant does not consider that a separate itemised calculation for every possible localised repair activity would provide a more meaningful assessment than the lifecycle approach adopted in the ES.
SW-D5-04	Mr Woodward questions the reference to spare parts for sealed solar modules and argues that future incompatibility, different panel dimensions or changes in technology could require more extensive and labour-intensive works than the replacement process described by the Applicant.	The reference to spare parts is intended to encompass compatible replacement modules and associated connectors, clamps, cabling and monitoring components. It does not assume that the internal components of a sealed module would be repaired on Site. The use of a future or more efficient technology would not permit replacement equipment to fall outside the authorised development or assessed environmental envelope. Replacement equipment must remain within the Order Limits, the description of the authorised works, the relevant design parameters and the physical and environmental controls secured through the DCO and approved management plans.
SW-D5-05	Mr Woodward considers that describing panel replacement as maintenance understates its scale and is intended to avoid construction-phase traffic controls. He argues that commercial	The Applicant does not dispute that a planned campaign involving up to 20% of the panels would be a substantial operational activity or that it would be capable of generating temporary effects. Those effects have been identified, described and assessed, in **ES Vol 2**

Our Ref.	Comment	Applicant Response
	considerations could lead the operator to replace all panels over a compressed period rather than in 20% campaigns.	**Appendix 2-4: Replacement Works [EN010141/DR/6.2**] and this appendix also now includes a sensitivity assessment of a Major Replacement Campaign involving replacement of 100% of the Scheme's panels. The term maintenance does not remove the works from environmental control. All repair, renewal and replacement activities are subject to the controls specified in the **oOEMP [as updated alongside this submission]**. The 20% threshold is a conservative trigger for an additional LPA review and written approval process. It is not the point below which works are uncontrolled. A campaign exceeding the 20% threshold cannot commence until a Major Replacement Campaign Method Statement and Environmental Review has been approved in writing. Commercial considerations cannot override the assessed parameters and secured controls. The Applicant does not accept Mr Woodward's inference that commercial considerations would necessarily result in all panels being replaced at the same time, or that a phased replacement programme would mean that the Scheme was operating inefficiently. The timing, sequencing and scale of panel replacement would be influenced by a range of factors, and it remains the Applicant's position that the most efficient and likely approach would be a series of campaigns involving replacement of less than 20% of the panels in any year. In any event, **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] now assesses a range of scenarios, including partial and phased replacement over several years and a sensitivity scenario involving replacement of 100% of the panels within a single campaign. The oOEMP secures the necessary controls relating to crew numbers, phasing, sequential and localised working, traffic, access, waste, soils, noise, air quality and other environmental matters.

Our Ref.	Comment	Applicant Response
SW-D5-06	Mr Woodward argues that replacement of approximately 20% of the panels would represent a solar scheme of NSIP scale in its own right.	The Applicant does not understand the basis of this point. The Applicant has applied for consent to construct, operate and decommission an NSIP-scale solar farm, including the maintenance and replacement of components necessary to maximise renewable energy generation throughout the Scheme's operational life. The Applicant has provided the required environmental assessment and secured appropriate controls to avoid and mitigate the effects identified. Whether a particular replacement campaign involves panels representing more than 50 MW of generating capacity is therefore not relevant.
SW-D5-07	Mr Woodward questions who would monitor and enforce the number of panels replaced, traffic levels and the timing of works. He considers that treating replacement as maintenance would allow unrestricted use of local roads by all vehicle types without the controls applied during construction.	The **oOEMP [as updated alongside this submission]** has been updated to require the preparation and maintenance of a replacement register so that the LPA can inspect the number and location of panels replaced within any 12-month period. Compliance with the final OEMP is secured through Requirement 9 of the DCO and is enforceable by the relevant planning authority. Operational and replacement traffic would not have unrestricted use of local roads. The oOEMP controls vehicle types, delivery bookings, routing, timing, parking, queuing and interaction with PRoWs, and requires deliveries passing Great Staughton Primary School to avoid peak periods and school arrival and departure times. A Traffic Coordinator has also been added to the Site team. Any Major Replacement Campaign submission must identify staff, delivery, collection and waste movements, vehicle types, routes, accesses, booking arrangements and traffic-management measures, and must be approved in writing before the works commence.
SW-D5-08	Mr Woodward disputes the assumption that a five-person crew could replace approximately 420 panels per day. He raises the time required for distribution, removal and handling of old panels, future	The figure of approximately 420 panels per day is an indicative throughput assumption based on the Applicant's experience of a coordinated production-line operation. Recognising that any

Our Ref.	Comment	Applicant Response
	panel compatibility, packaging, weathered or corroded fixings, storage capacity at Site D, temporary storage and security, just-in-time deliveries, potential off-site storage and double handling.	replacement campaign is likely to be in 20 years' time and noting that new automated replacement rigs, which lift and position panels in place, are becoming increasingly common, this could further enhance the speed of panel replacement. The response to BBC-D5-75 in the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]** explains the crew composition and the sequential process for disconnection, removal, installation, torque checking and electrical testing. The environmental assessment is not dependent on every crew achieving precisely 420 panels on every working day. A lower productivity rate would extend the programme rather than increase the maximum daily workforce, plant or vehicle movements, which are limited by the assessed crew and traffic parameters. Conversely, an increased replacement rate would reduce the programme. For any Major Replacement Campaign, the actual proposed throughput, duration, crew numbers, equipment condition, compatibility and programme would have to be identified and approved through the Method Statement and Environmental Review. The Applicant does not accept that potential corrosion of panel fixings would materially undermine the assumed replacement rate. Solar arrays and mounting systems are modular installations designed to allow individual modules to be inspected, maintained, removed and replaced, consistent with recognised design-for-disassembly and end-of-life principles. While isolated fixings may require additional attention after an extended period of operation, there is no basis to assume widespread corrosion across the Scheme. Such localised issues would be managed through the normal replacement process and would not materially affect the assumptions used in the assessment. Several activities identified by Mr Woodward, including the careful disconnection, stacking, securing and transportation of removed

Our Ref.	Comment	Applicant Response
		panels, are inherent in the efficient and systematic working method described by the Applicant and have been reflected in the proposed crew composition and logistics. The comments concerning deliveries, storage capacity and double handling are speculative and do not reflect the supply-chain, booking, phased delivery, temporary laydown and backloading arrangements that would be established for a replacement campaign. Furthermore, the logistics assumptions do not require the full quantity of panels for a 20% campaign to be stored within the Site D building. New panels would be delivered progressively to Site D and distributed to active work areas in consolidated loads. Each crew would typically receive two 18-tonne rigid-vehicle deliveries per day with vehicles returning to Site D would backload removed panels. Panels would not be stockpiled across the wider Scheme, and any temporary laydown, storage, security, ground-protection and reinstatement arrangements would be controlled through the OEMP and, for a Major Replacement Campaign, would require approval. **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] expressly recognises packaging and removed equipment as waste streams. The approved Waste Management Plan would control segregation, temporary storage, collection, reuse, refurbishment and recycling. **ES Vol 2 Appendix 15-1 Greenhouse Gas Emissions Assessment [REP2-021]** includes manufacture, transport to the Scheme and disposal and transport of removed equipment. The condition of existing fixings and any need for compatible clamps or connectors would be inspected and allowed for when the detailed campaign programme is prepared.
SW-D5-09	Mr Woodward considers that substantial parking would be provided at each Site and that replacement workers would be able to use local roads without restriction.	The Operations and Maintenance Area in Site D would be the primary operational hub for component storage, staff welfare and parking. The proposal does not rely on the creation of replacement

Our Ref.	Comment	Applicant Response
		car parks or reinstatement of construction compounds within Sites A, B or C. Replacement crews would travel from Site D to the relevant work area using vans or minibuses. **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] assesses crew-vehicle movements in addition to panel-delivery traffic. The 100% sensitivity assessment also adopts a conservative assumption that each worker could travel individually to Site D and concludes that the resulting traffic on the B645 would remain substantially below the maximum construction traffic assessed in the ES and Transport Assessment. Any temporary welfare, parking or laydown required for a Major Replacement Campaign would need to be identified in the Method Statement and Environmental Review and approved in writing. Vehicles would remain subject to the routing, booking, timing, parking and no-queuing controls in the OEMP.
SW-D5-10	Mr Woodward asks what water supply has been secured for BESS cooling and firefighting, particularly in a thermal-runaway event, and questions whether the proposed tanks would provide sufficient firefighting water during periods of water-use restriction.	The operational fire-safety strategy for the BESS, including containment, firefighting arrangements and emergency response, is addressed in the **Outline Battery Safety Management Plan [REP4-026]** which is secured through Requirement 10 of the **draft DCO [REP5-005]** and will be developed in consultation with Cambridgeshire Fire and Rescue Service and the Environment Agency. BESS cooling and fire-safety requirements are set out in the Outline Battery Safety Management Plan and full details will be determined through the final system design and the approved safety-management framework, in accordance with the relevant manufacturer requirements and standards. The tanks will be filled from an appropriate licensed and controlled source and will not rely on a live mains supply during an incident;

Our Ref.	Comment	Applicant Response
		water-use restrictions would therefore not affect the availability of the stored firefighting water.
SW-D5-11	Mr Woodward questions reliance on natural rainfall to clean the panels. He assumes that the full array would require at least annual washing, estimates a substantial water demand and argues that cleaning-related workforce, traffic and GHG effects should be assessed.	The **oOEMP [as updated alongside this submission]** explains that solar panels generally require little maintenance because natural weather conditions assist in keeping them clean, although site-specific conditions will be monitored. A precautionary worst-case assumption of biennial cleaning has been adopted, with the actual frequency likely to be lower and determined by operational performance. Where cleaning is required, it would use water and mechanical brushing only, with no chemical cleaning agents. A tractor-mounted system is currently assumed, and tractors, trailers and bulk tankers would be retained at the Operations and Maintenance Area for landscape maintenance and panel cleaning. The activity would therefore use the existing Site infrastructure and operational vehicles and would remain subject to the OEMP's access, pollution-prevention, surface-water and working-hour controls. Mr Woodward's estimate assumes that every panel would be washed at the same time, at least annually, using an assumed water quantity per panel. That is not the operational scenario set out in the oOEMP. The Applicant has considered the operational water supply requirements within the **ES Vol 2 Appendix 15-1 Greenhouse Gas Emissions Assessment [REP2-021]**. The precise water-supply arrangements for panel cleaning will be confirmed as part of the detailed operational arrangements and the final OEMP.

2.11 Response to Simon Lane

Table 11: Response to [REP4-079]

Our Ref.	Comment	Applicant Response
SL-D5-01	Reconcile Firewater Discrepancies: Provide engineering calculations explaining the massive variance between the 1,900-liter baseline and the independent 8-million-litre estimate.	The rate of 1,900 litres per minute is derived from National Fire Chiefs Council guidance for BESS developments, which recommends that an on-site firefighting water supply should be capable of delivering no less than 1,900 litres per minute for at least two hours. The purpose is principally to provide the sustained water flow needed by the fire and rescue service to cool adjacent BESS enclosures and prevent fire or thermal runaway from spreading, rather than necessarily to extinguish the affected battery enclosure itself.
SL-D5-02	Submit Sloping Site Runoff Modelling: Deliver an updated, topographically accurate fluid-dynamics model showing where contaminated firewater will flow on the site's sloping terrain.	The Applicant does not consider that a separate fluid-dynamics model is necessary or proportionate. The comment assumes that firefighting water would flow uncontrolled across the natural sloping terrain. In practice, the BESS and substation compounds will comprise an engineered impermeable drainage area, with firewater directed through the designed drainage system to the adjacent detention basin. The outfalls will be fitted with automatically actuated, failsafe isolation valves linked to the BESS fire-alarm system, so that potentially contaminated water is retained rather than discharged from the Site. The **outline Surface Water Management Plan [as updated alongside this submission]** already includes hydraulic modelling of the impermeable BESS area and requires the detention basin to accommodate the full 456,000-litre firefighting-water volume.
SL-D5-03	Disclose Lagoon Capacity Metrics: Provide exact volumetric data proving the proposed lagoon can hold and manage peak emergency water requirements.	The **outline Surface Water Management Plan [as updated alongside this submission]** shows the runoff volumes for a range of return periods (including climate change). The required storage for the detention basin is approximately 1,900 m^3 (excluding

Our Ref.	Comment	Applicant Response
		freeboard) and the firewater storage requirement is 456 m3. This leaves over 1,400 m^3 of headroom should the basin be filled with the specified firewater volume. When considering climate change impacts, the 1,400 m^3 headroom can accommodate the 3.3% AEP plus climate change event (which is approximately 1,300 m3) and almost the 2.0% AEP plus climate change event. The Outline Drainage Plan at Figure 3 of the **oSWMP [as updated alongside this submission]** shows dimensions for the detention basin, accounting for the top area of 1,270 m3. It also shows the bottom area based on the 1.5m top depth (1.2m maximum water level plus 300mm freeboard), and 1:3 side slopes.
SL-D5-04	Produce a Joint Risk Assessment for the Gas Main: Submit a risk assessment coordinated with the national gas grid operator detailing the blast radius and thermal runaway safety margins regarding the nearby high-pressure gas main.	The Applicant does not consider that a separate joint risk assessment in the form requested is necessary. The operational National Gas pipeline has been identified and the Scheme designed around its easement. The **draft DCO [REP5-005]** contains protective provisions for National Gas requiring plans and method statements for specified works within 15 metres of National Gas apparatus. Such works cannot commence without National Gas's written approval, and National Gas may require design modifications or protective works necessary to safeguard the pipeline.
SL-D5-05	Define the Detailed Design Auditing Body: Clearly name the independent body or authority that will hold legal accountability for auditing the BESS layout during its active lifespan.	It would not be appropriate for a third-party to assume legal accountability for the BESS. Legal responsibility for compliance with the DCO and the approved Battery Safety Management Plan (BSMP) will remain with the Applicant. The **oBSMP [as updated alongside this submission]** requires specialist technical verification by an independent Fire Protection Engineer, including review of the applicable UL 9540A and large-scale fire-testing results, fire and explosion evidence, suppression systems and equipment spacing. The final BSMP must identify both

Our Ref.	Comment	Applicant Response
		the role responsible for its implementation during each phase and the independent Fire Protection Engineer's technical-verification responsibilities.

2.12 Response to Stop East Park Energy

Response to Stop East Park Energy Submission on Construction Traffic [REP4-081]

2.12.1 Section 2 of SEPE's response document reiterates points previously raised by SEPE with regard to the traffic generation forecasts during the construction phase. The Applicant has previously provided its response to these comments at Deadline 3 in its **Response to Deadline 2 Submissions – Other Interested Parties [REP4-109]** (Ref. SEPE-D3-26). To reiterate, both Bedford County 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 (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)).

2.12.2 Section 3 of SEPE's response document references a "potential omission of construction traffic categories". In this regard, the Applicant would comment as follows:

- The forecast HGV trip generation includes for delivery of construction plant and vehicles to site.
- Section 2.4 of **ES Vol 1 Chapter 2: The Scheme [REP3-023]** sets out that construction compounds, which would include car parking areas, would be constructed using a base of heavy duty matting which would be removed following completion of the construction phase. As such, there would be no requirement for a bituminous surface layer.
- SEPE's estimation of the number of HGV movements required for delivery of trees and shrubs for landscaping works equates to approximately 0.2 additional two-way movements per day on average across the construction period. This is negligible and does not materially change the conclusions of the environmental assessment.

- The forecast trip generation includes for an estimated 9 fuel deliveries per month (18 two-way movements), on average, across the construction phase, using LGVs (approximately 4 two-way movements per week). SEPE's contention that fuel deliveries would instead be made by HGV tanker would effectively replace the forecast LGV movements with a single HGV movement per week. Again, this volume of traffic is negligible and does not materially change the conclusions of the environmental assessment.
- Section 2.4 of **ES Vol 1 Chapter 2: The Scheme [REP3-023]** sets out that the temporary access tracks would be formed of heavy-duty construction matting. This would not require excavation to install, and which could be removed without generating significant volumes of HGV traffic.

2.12.3 Section 4 of SEPE's response asserts that the perceived inaccuracies and omissions in the construction traffic forecasts would lead to understated impacts affecting the conclusions of the assessments submitted by the Applicant. The Applicant would refer to the previous response set out in Section 6.0 of the **Applicant Response to Stop East Park Energy [REP2-045]**. This identified that the forecast peak traffic flows used in the ES and TA were in line with the claimed peak number of movements previously presented by SEPE.

2.12.4 Section 5.1 of SEPE's response relates to concerns over the forecast number of construction staff trips. The Applicant would note that there is no inconsistency in the way that estimated construction staff trips have been presented within the various assessments. During the peak of construction there would be a maximum of 854 construction staff on site per day. It is standard practice on large construction projects to encourage construction staff to car share where practical, and the average car occupancy of 1.4 that was used as a basis for establishing the forecast trip generation was suggested by National Highways as being a reasonable assumption for the level of car sharing that would be expected to occur at a large-scale energy

project within a rural area. This figure was subsequently used to calculate the anticipated baseline peak construction staff trip generation for use in the ES and TA, resulting in the forecast peak trip generation of 610 arrivals and 610 departures per day.

2.12.5 The stated parking provision of 500 spaces and the proposal to implement a minibus shuttle service comprise the principal mitigation measures that would be put in place to reduce the total number of construction staff trips compared to the baseline peak figure.

2.12.6 The statement in paragraph 4.4.3 of the oCTMP that there would be sufficient space within the compound in Site D to provide overspill parking for the full peak construction workforce, if required, reflects the fact that in the worst-case scenario with no mitigation in place the site is large enough to accommodate the peak construction staff trip generation on-site without any parking occurring on the public highway.

2.12.7 Since the assessment is based on the forecast peak construction staff trip generation before mitigation measures are taken into account, the potential worst-case impacts have not been under-estimated.

2.12.8 Section 5.2 of SEPE's response raises concerns about the potential for increased congestion and queuing at junctions along the A1 as a result of the routing restriction requested by CCC, whereby construction HGVs would be restricted to using the northbound slip roads at the A1 St Neots junction. The Applicant would note that this routing has been discussed with National Highways who have not raised any concerns on the grounds that HGV movements during the construction phase would peak at 60 two-way movements (30 in each direction) per day. This level of traffic generation is minimal, and in any case would only occur for a short period of time. Throughout the majority of the construction phase the daily number of HGV movement would be substantially lower than this.

2.12.9 Section 5.3 of SEPE's response refers to the accident analysis presented in the TA. The Applicant has responded to this comment at Deadline 3 in its

Response to Deadline 3 Submissions – Other Interested Parties [REP4-109] (Ref. SEPE-D3-18 and SEPE-D3-19).

2.12.10 Section 5.4 of SEPE's response refers to perceived ambiguity regarding the proposed reinstatement of the network of temporary internal haul routes during the decommissioning phase. However, SEPE's response makes reference to paragraph 2.5.3 of the outline Decommissioning Environmental Management Plan, which clearly sets out the commitment to mirror the mitigation measures implemented in the construction phase. The requirement to prepare a decommissioning environmental management plan and decommissioning traffic management plan is secured within Requirement 18 of the draft DCO. This requirement also stipulates that no decommissioning activity can be undertaken until these documents have been approved by the relevant local authorities.

2.12.11 Section 5.5 of SEPE's response concerns the assessment of cumulative developments. The Applicant's approach to considering the appraisal of cumulative developments was clearly set out at **Issue Specific Hearing 2 [REP1-059]** (Section 2.5).

2.12.12 Section 5.6 of SEPE's response re-states previously raised concerns relating to the proposed location of the main site access junction. The Applicant's response in regard to this matter was provided within its **Response to Deadline 2 Submissions – Other Interested Parties [REP3-074]** (Ref. SEPE-D2-25). This clearly sets out that the proposed main site access junction was appraised as being a suitable location from the perspective of design standards and highway safety, and that these conclusions were verified by the local highway authority, CCC, in their response to the examination. The Applicant's response also highlights the fact that the relevant planning policy test is whether a proposed site access is acceptable in highway safety and operational terms, not whether another access arrangement may be preferable. The Applicant would reiterate the fact that since the proposed access meets all necessary highway safety / visibility standards set out in the Design Manual for Roads and Bridges, any

requirement to assess alternatives would be disproportionate and beyond what is necessary to make the Scheme acceptable in planning terms.

2.12.13 Section 5.7 of SEPE's response concerns the perceived absence of a Traffic Safety and Control Officer. In this regard, the Applicant would note that the **outline Construction Traffic Management Plan [REP4-095]** identifies that traffic management at the site would be the responsibility of the Construction Project Manager or their appointed deputy, and that a Health and Safety Manager would be appointed who would be responsible for the monitoring and control of health and safety. Whether any of these roles is specifically given the title of 'Traffic Safety and Control Officer', or whether a separate post would be created to fill this role, would be a matter for the Principal Contractor, once appointed, and would be set out within the final CTMP.

Response to Stop East Park Energy Submission on Replacement Works [REP4-082]

2.12.14 The Applicant has responded to the substantive points raised by Stop East Park Energy in Table 12, below. Where comments have been made which reflect points raised in BCC's Deadline 4 submission **[REP4-031]**, the Applicant has not repeated those responses, in order to avoid unnecessary repetition and maintain brevity.

Table 12: Response to [REP4-082]

Our Ref.	Comment	Applicant Response
*The **Technical Note on Replacement Works [REP3-075]** has been incorporated into the Environmental Statement and is now included as **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2]**. Several modifications have been made to the original technical note to incorporate feedback from BBC and other interested parties. References below to the **Technical Note on Replacement Works [REP3-075]** should be interpreted in light of these changes.*		
SEPE-D5-01	SEPE contends that the Applicant has not demonstrated that the full extent of the operational flexibility sought for replacement works would remain within the environmental envelope assessed in the Environmental Statement. It considers that the Technical Note relies on assumptions about future working practices and management arrangements without demonstrating that those assumptions are secured through enforceable provisions of the DCO and oOEMP. SEPE also questions whether the controls would apply effectively throughout the 40-year operational period and to the replacement of equipment other than solar panels.	The matter raised by SEPE substantially duplicates the concerns raised by Bedford Borough Council at paragraphs 1.2.1–1.2.3 of its **Deadline 4 submission [REP4-031]**. The Applicant therefore refers to its responses at BBC-D5-64 to BBC-D5-66 of the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]**. The ES has also been updated to incorporate the Technical Note on Replacement Works as **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**]. The assessment and conclusions set out in the Technical Note therefore form part of the ES and the environmental envelope against which future replacement activities must be considered. The **oOEMP [as updated alongside this submission]** has been substantially amended so that its controls apply expressly to all operational maintenance, repair, renewal and replacement activities. Replacement works are therefore not dependent upon

Our Ref.	Comment	Applicant Response
		unsecured operational assumptions. The relevant controls, monitoring requirements, record-keeping arrangements and corrective actions will form part of the final OEMP secured through Requirement 9 of the **draft DCO [REP5-005].** In addition, no Major Replacement Campaign may commence unless a Major Replacement Campaign Method Statement and Environmental Review has been approved in writing by the relevant planning authority and demonstrates that the proposed works would not give rise to materially new or materially different environmental effects from those identified in the Environmental Statement, which now integrates **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2].**
SEPE-D5-02	SEPE considers that the proposed 20% threshold has not been justified by environmental evidence and appears to be based principally on the perceived likelihood of replacement rather than the significance of its effects. It argues that a larger programme could be divided into successive campaigns at or below 20%, thereby avoiding campaign-specific approval, and questions whether the cumulative effects of repeated replacement works over the operational life of the Scheme have been assessed.	The Applicant refers to its response to BBC at reference BBC-D5-80 in the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]**. SEPE's criticism does not recognise the purpose of the 20% threshold or the relationship between the assessment of replacement works and the construction phase assessment contained in the ES. The construction phase assessment considered the types of environmental effects that could also arise during a replacement campaign, including those associated with vehicle movements, workforce activity, noise, air quality, waste, soils, drainage, ecology and effects on local communities. **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] considers the nature and scale of the activities that would be required during the operational phase and explains why the magnitude of those effects would be lower than during construction. In particular, replacement works would not require major ground disturbance, the construction of new access tracks, the installation of new foundations or below-ground cable runs, or the wholesale erection of panel-support structures. The works would instead take place within an

Our Ref.	Comment	Applicant Response
		established operational solar farm using existing accesses, tracks, infrastructure and environmental management arrangements. Even if successive replacement campaigns were undertaken at a level just below the 20% threshold, those works would not be uncontrolled. They would remain subject to all mitigation, monitoring and management measures secured through the **oOEMP [as updated alongside this submission]** and the associated topic-specific management plans. The oOEMP has also been amended to require a minimum of two crews for any planned panel replacement campaign and to ensure that replacement activities are undertaken on a phased, sequential and localised basis. All active crews would operate within the area served by a single operational Site access on any working day, with each crew progressing systematically through a defined work area before moving to the next. Unnecessary dispersed or uncoordinated working across the Scheme would therefore be avoided. Consequently, although successive campaigns could extend the overall Scheme-wide replacement programme, the activity experienced at any individual work area, access, settlement or environmental receptor would be limited in both magnitude and duration and would remain materially less intensive than the construction phase. There is therefore a clear technical and environmental basis for concluding that the effects of replacement works would remain within the environmental envelope assessed in the Environmental Statement. The mitigation and management measures secured through the oOEMP have been derived from the findings of that assessment and would apply to all replacement activities, including campaigns involving up to 20% of the panels within a rolling 12-month period. The Applicant considers that those controls would also be likely to remain suitable for a Major Replacement Campaign.

Our Ref.	Comment	Applicant Response
		In this regard the 20% threshold is not intended to represent the point at which significant environmental effects would necessarily arise, nor the point below which replacement works would be uncontrolled. It is a prudent and conservative trigger for an additional review and approval process. A larger campaign may take place many years after construction, when the environmental baseline, surrounding development, regulatory requirements, available technology and operational experience of the Scheme may have changed. It is therefore appropriate that, above that threshold, the Operator must demonstrate through a Major Replacement Campaign Method Statement and Environmental Review that the approved OEMP controls remain suitable or identify any additional or amended measures required to ensure that the works do not give rise to materially new or materially different environmental effects.
SEPE-D5-03	SEPE considers that the description of major replacement works as routine maintenance understates their potential scale, noting that the replacement of 20% of the Scheme would involve approximately 140,000 panels and substantial associated logistics. It questions whether this scale has been adequately assessed and whether the assumptions underpinning the assessment are secured.	The Applicant does not dispute that a planned replacement campaign involving 20% of the solar panels would constitute a major operational activity in its own right, or that the associated works would be capable of generating environmental effects across a range of receptors. Nor has the Applicant sought to dismiss those effects merely by describing replacement as a maintenance activity. Nonetheless, these are routine maintenance works in the life of a utility scale solar farm. The material consideration is whether the nature, magnitude and significance of the potential effects have been properly identified, described, assessed and made subject to appropriate controls. In this instance, the relevant types of effects were assessed as part of the construction phase assessment in the ES, and to the maximum construction parameters. The **Technical Note on Replacement Works [REP3-075]** then considered how the scale and intensity of those effects would differ during replacement activities and demonstrated why they would be of a lower magnitude than during

Our Ref.	Comment	Applicant Response
		construction, including because the works would not require major ground disturbance, new access tracks, foundations, below-ground cable runs or the wholesale erection of panel-support structures. The **oOEMP [as updated alongside this submission]** applies the mitigation and management measures derived from that assessment to replacement activities and provides the necessary controls, monitoring and corrective action process. The Applicant has therefore acknowledged the scale and potential effects of a replacement campaign and has provided both an assessment of those effects and an enforceable framework for their management and mitigation. On that basis, the Applicant considers that the ES, which now incorporates **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] establishes an appropriate environmental envelope within which the likely effects associated with the operational flexibility required to undertake those works have been properly identified and assessed.
SEPE-D5-04	SEPE sets out that the Applicant acknowledges that future replacement equipment may differ from that originally installed because of technological advances, obsolescence and compatibility requirements, but has not explained how such future equipment would be shown to remain within the assessed design and environmental envelope. It also questions why the campaign-specific approval mechanism applies principally to solar panels rather than to replacement of BESS units, transformers, inverters and other principal electrical infrastructure.	The fact that replacement equipment may use an alternative or more efficient technology does not mean that it may fall outside the authorised development or the assessed environmental envelope. To the contrary, the DCO application is based upon defined parameters and the environmental effects that would arise from those parameters rather than a commitment to a particular manufacturer or model. Replacement equipment must remain within the Order limits, the description of the authorised works, the relevant design parameters and the physical and environmental controls secured through the DCO, approved OEMP and other management plans which impact control on the development undertaken e.g. LEMP. If a proposed technological change could not be accommodated within the authorised development or would result in effects outside

Our Ref.	Comment	Applicant Response
		the assessed envelope, it could not simply be undertaken as operational replacement under the DCO and any necessary further consent would have to be obtained. Replacement of BESS units, inverters, transformers and other equipment will remain subject to the approved OEMP, relevant topic-specific management plans and the Operational Access Strategy. **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**] has also assessed the unlikely scenario of full BESS replacement within a year, and the **oOEMP [as updated alongside this submission]** limits deliveries to one BESS unit on any working day.
SEPE-D5-05	SEPE considers that a requirement merely to notify the LPA would not provide meaningful regulatory control. It seeks clarification as to whether the LPA could require further mitigation, amend or refuse a campaign, determine that it fell outside the assessed environmental envelope, or prevent works from commencing pending further assessment.	The revised **oOEMP [as updated alongside this submission]** does not provide for notification alone when a Major Replacement Campaign is proposed. It expressly prohibits its commencement until a Major Replacement Campaign Method Statement and Environmental Review has been approved in writing by the relevant planning authority. The authority may require additional information, amendments to the programme or further mitigation before determining whether the environmental test is satisfied. If it is not demonstrated that the works would avoid materially new or materially different effects, the campaign could not be approved under that procedure. Once approved, the approved method statement would form part of the OEMP framework secured through Requirement 9 and would be enforceable accordingly.
SEPE-D5-06	SEPE contends that the Technical Note's conclusion that replacement-related traffic would remain within the effects assessed for construction depends upon assumptions concerning panel-replacement productivity, workforce numbers, campaign duration and the number of crews deployed. It argues that the evidential	As set out with reference to BBC-D5-69 in the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69],** the **oOEMP [as updated alongside this submission]** has been updated to include a commitment to use a minimum of two crews in any replacement campaign of up to 20% of panels, and with reference to BBC-D5-70 describes other commitments made in relation to the phased and sequential basis

Our Ref.	Comment	Applicant Response
	basis for those assumptions is insufficiently explained and that they are not adequately secured through the draft DCO.	of any replacement campaigns. The OEMP must be prepared in substantial accordance with the oOEMP, and therefore these controls are enforceable under the DCO. The Applicant has explained the basis of the assumptions it has used and considers them reasonable and appropriate to allow the likely significant effects of the Scheme to be established. Additional explanation on the replacement productivity and programme duration is provided with reference to BBC-D5-74 to BBC-D5-75 of the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]**.
SEPE-D5-07	SEPE raises concern that the removal of internal construction haul roads would require replacement traffic to use public roads through Great Staughton, Pertenhall and other settlements, including routes past Great Staughton Primary School. It questions whether these routes and receptors have been adequately assessed, aggregates potential movements associated with panels and other electrical equipment, and argues that workforce, commuter, delivery and waste movements should be considered cumulatively.	The potential traffic effects associated with panel replacement, including the concurrent replacement of inverters, solar transformers, BESS units and associated transformers, have been assessed at paragraphs 3.6.24–3.6.31 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**]. As explained at paragraph 3.6.26, deliveries of centralised inverters and solar transformers would be limited to one delivery per day, equating to a maximum of one HGV movement in each direction. All replacement BESS units would be delivered directly to Site D and would therefore not travel through Great Staughton or Pertenhall. The oOEMP also expressly limits the delivery of replacement BESS units to no more than one unit per day. The scenario identified by SEPE, comprising the replacement, within a single year, of 20% of the solar panels together with all inverters, solar transformers, BESS units and associated transformers, is considered exceptionally unlikely. Nevertheless, that combined scenario has been assessed. As set out at paragraph 3.6.30 of **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2**], it would generate a cumulative maximum of 22 two-way delivery trips per day along Little Staughton Road and the B660 Kimbolton Road through Pertenhall. This maximum would arise on only 15 days over the course of the replacement

Our Ref.	Comment	Applicant Response
		programme. It would not result in any additional traffic on the B645 through Staughton Highway and Great Staughton beyond that already associated with panel replacement activities. In the theoretical worst-case scenario in which all relevant components were replaced in the same year alongside a 20% panel replacement campaign, there could be up to six additional two-way HGV movements per day on the B645, in addition to the maximum of 20 panel-related movements. These movements would be temporary, limited in duration and subject to the routing, scheduling and traffic-management controls secured through the **oOEMP [as updated alongside this submission]**. The resulting traffic levels have been assessed and would not give rise to significant environmental effects.
SEPE-D5-08	SEPE requests that a dedicated Traffic Safety and Control Officer, or equivalent competent person, be appointed for operational replacement works to coordinate traffic movements, incidents, roadworks, local events and emergency responses and to act as a single point of contact for highway matters.	Section 3.0 of the **oOEMP [as updated alongside this submission]** already makes clear that the identified Site roles are not definitive and that additional roles and responsibilities may be included in the final OEMP. Nevertheless, to provide further clarity and assurance, the oOEMP has now been amended to include a Traffic Co-ordinator within the Site team. This role will complement the existing responsibilities of the Site Manager, Environmental Manager and Health and Safety Manager, the latter who is responsible for the monitoring and control of health and safety matters during the operational phase. The introduction of the Traffic Co-ordinator should also be considered alongside the wider operational controls already contained in the oOEMP. These include the management of activities where public rights of way interact with operational access routes; the maintenance of Site security and protection of the public; the provision of permanent and temporary warning signage at accesses and PRoW crossings; controls preventing operational vehicles from parking, queuing or waiting on the public highway; and arrangements governing deliveries and collections. Together

Our Ref.	Comment	Applicant Response
		with the campaign-specific controls and approval process, these measures provide an appropriate and proportionate framework to safeguard highway users, PRoW users, local communities and other receptors potentially affected by operational traffic.
SEPE-D5-09	SEPE raises concern that HGVs, handling plant and temporary laydown between panel rows could compact or damage soils and grassland during replacement campaigns. It considers that the effects have not been adequately assessed or secured and seeks enforceable measures covering ground protection, inspection, remediation and restoration.	The potential for soil compaction and damage during replacement activities is expressly recognised within the application and the **outline Soil Management Plan (oSMP) [as updated alongside this submission]**. Temporary laydown is restricted to the Operations and Maintenance Area, existing tracks or hardstanding, or suitable locations between panel rows. Where ground conditions require it, temporary ground-protection matting must be installed to prevent compaction, rutting and damage to grassland and soils. On completion, temporary materials must be removed, the affected land inspected, and the land promptly reinstated. The oSMP requires vehicle movements to use established tracks wherever practicable, limits off-track movements to appropriate ground and moisture conditions, requires the use of low-pressure tyres where possible and provides for monitoring and remediation under the approved Soil Management Plan. For a Major Replacement Campaign, the Method Statement and Environmental Review must identify the proposed laydown, ground protection, reinstatement and soil-management arrangements. The management and mitigation measures described above are described in the oOEMP and the outline Soil Management Plan, both of which are secured via the DCO pursuant to Requirements 9 and 7, respectively.

Response to Stop East Park Energy Submission on Decommissioning [REP4-083]

Table 13: Response to [REP4-083]

Our Ref.	Comment	Applicant Response
SEPE-D5-10	The Applicant has identified neither the likely costs of decommissioning and restoration nor any mechanism by which those costs would be independently secured throughout the operational life of the Scheme. Instead, the Applicant invites the Examining Authority to rely on future plans, future regulatory controls and future compliance by future owners. SEPE respectfully submits that this provides insufficient assurance for a development with a proposed operational life of 40 years. The Examining Authority should therefore consider whether an independently secured and periodically reviewed financial mechanism, sufficient to meet independently verified decommissioning and restoration costs, is necessary to ensure that the Scheme can be fully restored in all reasonably foreseeable circumstances.	The Applicant has provided a response to this matter at paragraphs 2.2.43 to 2.2.47 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**.

Response to Stop East Park Energy Submission on BESS Safety [REP4-084]

Table 14: Response to [REP4-084]

Our Ref.	Comment	Applicant Response
SEPE-D5-11	Key concerns raised by SEPE included: 1. Whether the impacts assessed today remain representative given that the final BESS technology, battery chemistry and supplier have not been selected, particularly where detailed supplier engagement and technology evaluation had been undertaken pre-application on other DCO projects. 2. The extent to which emergency response arrangements, fire behaviour and thermal runaway risks may vary with future technology choices. 3. Whether the fire modelling assesses the maximum credible thermal runaway scenario rather than only a single-enclosure fire event. 4. Whether future approval processes will provide scrutiny equivalent to that available through the Examination. 5. Whether the flexibility sought remains within the bounds of the impacts assessed and whether substantial weight can therefore properly be attached to the claimed benefits of the BESS. 6. The Applicant's claimed Gate 2 connection position, noting that when asked by the Examining Authority (ExQ1 Q1.1.20) to provide evidence of that position, the Applicant directed the Examination to the NESO TEC Register, yet the relevant entry does not identify any Gate status. SEPE therefore invites the Examining Authority to require clear evidence and details of the Scheme's actual connection position.	1. The fact that the final BESS supplier, enclosure design and battery chemistry have not yet been selected does not mean that the effects of the BESS are uncertain or that the assessment is incomplete. As explained in response to Q1.1.1 in the **Applicant Response to the Examining Authority's First Written Questions [REP3-072]**, the concept design assumes lithium iron phosphate (LFP) technology because this is a commonly deployed BESS chemistry and was considered to provide a reasonable worst-case basis for assessing toxic and explosive gas-production risks. The Applicant also made clear that the final chemistry would be confirmed through detailed design. This matter was considered further with reference to SEPE-D3-11, SEPE-D3-14 and SEPE-D3-15 in the **Applicant's Response to Deadline 3 Submissions – Other Interested Parties [REP4-109]**. Any final system must remain within Work No. 2, the design parameters and the assessed environmental envelope and must satisfy the minimum safety outcomes established by the **oBSMP [as updated alongside this submission]**. 2. As explained with reference to SEPE-D3-11 and SEPE-D3-12 in the **Applicant's Response to Deadline 3 Submissions – Other Interested Parties [REP4-109]**, the oBSMP establishes the applicable safety objectives, testing standards, mitigation requirements and minimum performance outcomes. The final BSMP and Emergency Response Plan will then incorporate the actual battery chemistry, enclosure configuration, fire and gas-

Our Ref.	Comment	Applicant Response
	7. The continued reliance on substantial BESS benefits despite NGET's confirmation that the BESS has neither been allocated its own grid connection nor qualified for 'Gate 2' status, and the absence of any quantified reassessment of how this affects the capabilities and benefits attributed to the project.	detection systems, suppression and ventilation arrangements, and supplier-specific thermal-runaway data. 3. The selected BESS must have completed large-scale fire testing demonstrating that fire does not propagate beyond the enclosure of origin and that equipment loss is limited to one enclosure without direct firefighter intervention. The **oBSMP [REP4-026]** also requires a final system-specific plume and consequence assessment using the characteristics and test data for the equipment actually selected. Accordingly, modelling a single fully consumed unit is consistent with the secured propagation-prevention strategy and does not understate the credible effects of the authorised development. 4. Requirement 3 of the **draft DCO [REP5-005]** requires approval of the detailed BESS design before Work No. 2 may commence. Requirement 10 separately prevents Work No. 2 from commencing until a final BSMP has been approved by the relevant planning authority following consultation with Cambridgeshire Fire and Rescue Service and the Environment Agency. As set out in the **oBSMP [REP4-026]**, the approval process will be supported by recognised testing regimes and specialist independent technical verification. It also includes pre-delivery and pre-energisation hold points and requires the evidence demonstrating release of those hold points to be retained. 5. As explained at paragraphs 2.2.21 to 2.2.44 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**, the Scheme is outline in its specification but not uncertain in its scope or environmental outcome. The ES assesses a defined reasonable worst-case envelope, and the draft DCO secures maximum

Our Ref.	Comment	Applicant Response
		parameters, design principles and minimum mitigation requirements. Detailed design may refine the authorised Scheme but cannot authorise development outside Work No. 2 or give rise to materially new or materially different environmental effects. 6. The BESS currently has a Gate 1 offer in respect of its separate 100 MW import capability and does not presently have a confirmed Gate 2 import connection. This distinction was set out with reference to SEPE-D3-01 in the **Applicant's Response to Deadline 3 Submissions – Other Interested Parties [REP4-109]** and at paragraphs 2.2.45 to 2.2.47 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**. 7. As explained with reference to SEPE-D3-01, SEPE-D3-03, SEPE-D3-09 and SEPE-D3-10 in the **Applicant's Response to Deadline 3 Submissions – Other Interested Parties [REP4-109]**, the BESS should presently be assumed not to import electricity from the transmission network. It can nevertheless be charged from the Scheme's solar generation and export the stored electricity through the Scheme's Gate 2 generation export connection. The Applicant has not relied upon a quantified benefit attributable to future grid import or standalone arbitrage. As previously explained with reference to SEPE-D3-03 in **[REP4-109]**, the BESS was included in the assessment of embodied greenhouse-gas emissions, but operational carbon benefits were not counted in the Scheme's quantified carbon benefits given their uncertainty. The loss or deferral of a supplementary import capability therefore does not remove a quantified benefit previously relied upon or alter the assessed physical and environmental effects of the BESS. As set out at CP-D3-01 in **[REP4-109]**, the public benefits identified at Section 5 of the **Planning Statement [APP-031]** are not

Our Ref.	Comment	Applicant Response
		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. 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.

Response to Stop East Park Energy Submission on the BESS grid connection [REP4-085]

Table 15: Response to [REP4-085]

Our Ref.	Comment	Applicant Response
SEPE-D5-12	SEPE question the deliverability and planning benefits of the Scheme based on the status of the BESS grid connection. SEPE's full submission can be found in the examination library at **[REP4-085]**.	The Applicant has provided responses to this matter at paragraphs 2.2.45 to 2.2.52 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**, as well as in responses to a number of interested parties within the **Applicant Response to Deadline 3 Submissions - Other Interested Parties [REP4-109]**.

Response to Stop East Park Energy Submission on Carbon Assessment [REP4-086]

Table 16: Response to [REP4-086]

Our Ref.	Comment	Applicant Response
SEPE-D5-12	SEPE question the accuracy and validity of the greenhouse gas assessment undertaken by the Applicant as part of the ES. SEPE's full submission can be found in the examination library at **[REP4-086]**.	The Applicant has provided an overarching response to this matter at paragraphs 2.2.7 to 2.2.20 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**. In addition, the Applicant has provided a response to similar comments raised with reference to response SW-D6-01 in Section 3.7 of this document.

3.0 RESPONSE TO DEADLINE 5 SUBMISSIONS

3.1 Response to Borough of Bedford Local Access Forum

Table 17: Response to [REP5-032]

Our Ref.	Comment	Applicant Response
BOBLAF-D6-01	Pertenhall BW 26 and Bolnhurst & Keysoe BW 37 The BHS has set out its comments on the two videos of this bridleway and we support their position. We consider that the videos do illustrate the shortcomings in the proposals to ensure the safety of users, particularly equestrian users, during the construction phase of Site A. We agree with the assessment that the bridleways will be effectively closed to equestrian users whenever construction or cabling work is being undertaken. And we support the Society's call for a safer alternative diversion route for use on such occasions.	As set out in the Applicant's responses above to BHSB-D5-02 to BHSB-D5-06 in Table 1, a temporary diversion has now been agreed.
BOBLAF-D6-02	The 'crossroad' junction of B&K FP13 and B&K FP47 within Site B – this is viewpoint 33 in APP-129 and APP-135. This point is at 5:17 of Video 3. By rotating the view, the ExA will be able to see the openness of views of the existing footpaths: • FP47 westbound, ahead of the operator, has a hedge to one side (the north) • FP13 northbound, to the right, crosses a small footbridge between hedges and then also has a hedge to one side (the east)	Visualisations from Viewpoint 33 are contained within the application at **ES Vol 3 Figure 5-37a to 5-37x [APP-135]**. It is acknowledged that the proposed mitigation planting would reduce some longer distance views currently available from the PRoW network in the vicinity of Viewpoint 33. However, baseline views from this location are already partly filtered and enclosed compared to other viewpoints, largely by existing hedgerow. Native hedgerows and trees are characteristic components of the local landscape and have been integrated through the design process to reinforce existing landscape structure, strengthen field boundaries and reduce visual effects whilst remaining consistent with local landscape character. It is therefore not inappropriate or inconsistent with the local landscape that, over time, these

Our Ref.	Comment	Applicant Response
	• FP47 eastbound, behind the operator – which he has already crossed – is an open cross-field path • FP13 southbound, to the left of the operator, is also an open path but on a headland rather than cross field. All of these paths will become enclosed within a corridor of hedges, albeit slightly wider for part of FP47 eastbound. We hope that the Inspector, by viewing the 360 degree panorama at this point, will understand the loss of enjoyment and amenity that results from the proposed development.	characteristic landscape features would alter some existing views experienced by users of the PRoW network. The assessment recognises those changes and has taken them into account in determining the residual visual effects.

3.2 Response to Stop East Park Energy

Table 18: Response to [REP5-033]

Our Ref.	Comment	Applicant Response
NOTE: Only the headings from SEPE's submission are provided below, for their full submission see [REP5-033]		
SEPE-D6-01	1. Eaton Socon Substation – uncertainty over connection programme and impact assessment	The Applicant has previously addressed this matter in response to SEPE-D3-01 in the **Applicant's Response to Deadline 3 Submissions – Other Interested Parties [REP4-109]**, and Q1.1.21 in the **Applicant Response to the Examining Authority's First Written Questions [REP3-072]**. The Scheme has a connection offer to Eaton Socon Substation with a connection date of October 2028. The remaining uncertainty concerns the detailed scope and programme of NGET's works within or around the substation, not the Scheme's agreed connection. The expectation is that if an upgrade is required of the Eaton Socon Substation, NGET will have completed the required works by the time the Scheme needs to connect. However, the Applicant is not in a position to confirm this. There are no sufficiently developed proposals from which a meaningful cumulative assessment can be undertaken, and the Applicant's assumption is therefore that the Scheme would connect into a new generation bay within the existing Eaton Socon Substation. This is secured by Work No. 5 in the **draft DCO [REP5-005]** and shown on the **Works Plan [APP-009]**. The Applicant does not consider that inventing a hypothetical NGET substation scheme would provide a more robust assessment.
SEPE-D6-02	2. East Park Energy battery energy storage system – discrepancy between Application and Scheme under review	The Applicant has reviewed the following application documents to amend the references to a grid connection agreement for 100 MW import in relation to the BESS:

Our Ref.	Comment	Applicant Response
		• **ES Vol 1 Chapter 1 Introduction [as updated alongside this submission]**; • **ES Vol 2 Chapter 2 The Scheme [as updated alongside this submission]**; • **Planning Statement [as updated alongside this submission]**; and • **Policy Compliance Document [as updated alongside this submission]**. The Applicant has provided a response above with reference to SEPE-D5-11 on the connection position of the BESS and the benefits of the Scheme. The Applicant disagrees with the statements made by SEPE at section 2.2.1 of the submission **[REP5-033]**. The reference at paragraph 5.2.3 of the **Planning Statement [APP-031]** is consistent with the proposed role of the BESS as part of the Scheme, with the BESS providing flexibility as to when electricity generated by the Scheme can be provided to the National Grid – helping balance supply and demand.
SEPE-D6-03	3. Live high-pressure gas pipeline alongside BESS	The suggestion that the operational pipeline has only emerged late in the Examination is incorrect. The Applicant has always acknowledged the locations of gas pipelines which cross the Site, and these have been identified in the application documents since submission in October 2025. The Applicant has never suggested these pipelines were not 'live'. The buried gas pipeline in question was identified in the following submission documents: • Paragraphs 2.5.42-44, and Tables 2-18, 2-21, 2-25, 2-27 of **ES Vol 1 Chapter 2 [APP-038]**;

Our Ref.	Comment	Applicant Response
		• **ES Vol 3 Figure 2-1k Illustrative Environmental Masterplan [APP-121]**; • **ES Vol 3 Figure 2-3d Indicative Crossings Plan [APP-123]**; In addition, the utilities crossing the Site were considered at paragraphs 16.4.25-26 of **ES Vol 1 Chapter 16 [APP-052]**. Protective provisions for the benefit of National Gas Transmission are included at Part 4 of Schedule 13 of the **draft DCO [REP5-005]**.
SEPE-D6-04	4. Transport assessment and construction traffic management: evidential deficiencies and inadequate controls	This point substantially repeats matters already addressed in response to **[REP4-081]** at paragraphs 2.12.1-13 above.
SEPE-D6-05	5. Further errors acknowledged in Applicant's carbon dioxide emissions calculations	The Applicant has provided an overarching response to this matter at paragraphs 2.2.7 to 2.2.20 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**. In addition, the Applicant has provided a response to similar comments raised with reference to response SW-D6-01 in Section 3.7 of this document.
SEPE-D6-06	6. Scheme generation assumptions and overplanting	The Applicant has addressed this matter with reference to SEPE-D3-35 and SEPE-D3-40 in the **Applicant Response to Deadline 3 Submissions - Other Interested Parties [REP4-109]** and paragraphs 2.2.1-6 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**.
SEPE-D6-07	7. Interpretation of case law and the High Court judgment in Lullington Solar Park Ltd [2024] EWHC 295	The Applicant acknowledges that the words quoted by SEPE appear in paragraph 36 of Lullington, but the quote mischaracterises the judgement and is provided without material context. The Court did not establish a general rule that a solar site selection exercise is inadequate whenever off-site intrusive soil surveys have not been undertaken. Rather, it held that it was *not necessarily*

Our Ref.	Comment	Applicant Response
		inconsistent for the Inspector, on the particular evidence before him, on that particular case, to reach that conclusion. The court found that the Inspector did not err in law in reaching the conclusion they made on dismissing that appeal, rather than supporting a case for off-site soil surveys. SEPE quotes HHJ Jarman KC as stating that "*an assessment which involves no soil surveys outside the [appeal] site is not sufficiently robust*." This quotation is misleading in two respects. First, this is not a direct quotation from the judge's own reasoning articulating a legal test. It is a paraphrase of the inspector's finding of fact, which the judge held was not irrational. The judge stated at [36]: "*It is not then necessarily inconsistent to conclude that an assessment which involves no soil survey outside the appeal site is not sufficiently robust*". The word "necessarily" is critical as the judge was holding that such a conclusion was *open to* the inspector, not that it must always follow. Second, the finding must be read in its proper factual context. In *Lullington*, the deficiency in the assessment was not merely the absence of off-site soil surveys in isolation. The critical issue was that the claimant's Site Selection Assessment made a specific unsupported assumption. This is not the case in respect of the Application where the Applicant made worst case assumptions as a matter of principle. The legal principles articulated in *Lullington* in fact support the Applicant's case: • It is "*not practicable or reasonable fully to investigate every possible location for a solar farm within a wide study area*" (at [20], endorsed by the judge at [36]).

Our Ref.	Comment	Applicant Response
		• It is "*not incumbent on appellants to demonstrate that there are no possible alternatives to an application site*" (at [20], endorsed by the judge at [36]). • Whether the availability of alternative sites is a material consideration "*depends on the circumstances*" (*R (Mount Cook Land Limited) v Westminster City Council* [2017] PTSR 116, cited at [33]). • A planning inspector's assessment of the adequacy of evidence is a matter of planning judgment with which the court will not interfere absent irrationality (at [31] and [40]). These principles confirm that the question of whether a particular site selection assessment is adequate is a matter of planning judgment for the decision-maker, not a mechanistic checklist. SEPE's attempt to convert *Lullington* into a rigid rule requiring off-site soil surveys in all circumstances is unsupported by the judgment itself.

3.3 Response to British Horse Society – Bedfordshire

Table 19: Response to [REP5-034]

Our Ref.	Comment	Applicant Response
BHSB-D6-01	**Digital Survey 9a** This video shows an ariel view of Pertenhall BW26 close to Manor Farm, a farm track that would also be used as access to Site A with all vehicles entering or leaving the site via the joining track from the B660. The video clearly shows the two pinch points that create safety concerns for equestrian users of the bridleway. These points were mentioned in both the BHS Beds RR and WR and were more fully described in our submission of suggested locations for the Inspector's site visit (PDA-026). At 02:56 of the video, the junction of the track from the B660 with the BW can be seen. Note the width of the vehicle track marks and the way that the gravel has been swept onto the verge opposite the access track. All traffic will pass this point and it is intended that a banksman will be in position here. Some traffic may be directed to the left towards the construction up the hill to the west of the site. But the majority will turn right and head, presumably, to the main construction depot for Site A. A banksman at this point will be able to see traffic approaching from the B660 quite easily, traffic approaching from either direction on the bridleway will only be visible from about 140m away. The safety measures proposed by the Applicant require that HGVs stop 100m away from a horse. Is this feasible? At 3.16, the narrow width of the left-hand grass verge adjacent to the BW can be seen, and the deep ditch alongside can be identified	Whilst the Applicant maintains its previous position that the safety measures proposed for the bridleway are adequate to ensure PRoW user safety, as set out in the Applicant's responses above to BHSB-D5-02 to BHSB-D5-06 in Table 1, a temporary diversion has now been agreed which the Applicant considers to resolve the concern. Nonetheless, the Applicant is still committed to providing a banksman, and has provided greater clarity around when a banksman will be deployed within the **oPROWMP [as updated alongside this submission]**.

Our Ref.	Comment	Applicant Response
	by the darker vegetation colour at the base of the hedge. Most of the traffic will pass this point. Should a horse be required to squeeze between a stopped (or indeed moving) HGV at this point there is, in my view, a high risk of an accident. Especially as HGV air brakes can go off at any time, even when stopped. As I noted in my post ISH3 submission, the impact of this development and the proposed 'safety' arrangements is effectively to close the bridleway to equestrian users throughout the construction phase of Site A. This is contrary to the Applicant's stated intentions and in our view unacceptable, given that a safe diversion could be provided with cooperation from a benefitting landowner.	
BHSB-D6-02	**Digital Survey 9b** I would encourage the Inspector to view the video from about 1:40 to the end (5:50) with the view to the right of the track visible – this is the view that will be lost behind the most westerly arrays of Site A and, eventually, behind the trees being planted as screening. This will be permanent loss. The operator takes over 12 minutes to walk that stretch of bridleway (the video is at 3 times speed – see 3.2.1 of REP4-114) so the loss is not just a fleeting impact but a sustained one. The Inspector heard at the ISH how valued this open view from the ridgeline is by local walkers as well as by equestrians. The Society considers that this video supports our view that the impact of this development on this bridleway is very significant adverse and has been understated by the Applicant and its advisers.	The Applicant has provided a response in relation to this location with reference to BHSB-D5-01 in Table 1 of this document.

Our Ref.	Comment	Applicant Response
BHSB-D6-03	**Digital Survey 9b** It is proposed that a banksman may (NB not will) be positioned at the point where BW37 and BW40 cross and that his role, no doubt amongst other things, will be to warn of equestrian users so that instructions can be given to cease non-essential noisy activity when horses are passing. This point is at about 1:39 on the video. By revolving the video around through 360 degrees, it can be seen that • A banksman at that point would have a reasonable view of horses arriving up BW40 from Brook End but limited views in the other three directions. • A horse on BW37 from Pertenhall will have passed the access road banksman so fore warning in that direction might be achievable but • Horses on BW37 from the west will not be visible until they are well along the bridleway. Indeed, at the very end of the video, the inspector will see the bridleway emerging out of the spinney at the end of Site A – there is no possibility that a horse will be noticed by anyone before it emerges from this woodland area – even workers in that far corner of the site. • Horses on BW40 from Swineshead will not be seen by any banksman before they have already been alongside the works from some time.	The Applicant has provided a response in relation to this location with reference to BHSB-D5-04 in Table 1 of this document.
BHSB-D6-04	**Digital Survey 10** As I noted in my comments on the VSI plan, I see the value in this 360 walkover to show the Inspector what a PRoW within a relatively narrow corridor looks and feels like – this will be the longterm experience of many of the PRoW within the site, including Hail	The Applicant provided Digital Survey 10 as requested by Jonathan Hart at Procedural Deadline A. The Applicant disagrees that this is should be considered a comparison for the future PRoW within the Site, as it is a narrower corridor than those which will be secured through the Site. The Applicant would instead refer the Examining Authority to the visualisations of the Scheme presented as part of

Our Ref.	Comment	Applicant Response
	Weston bridleway 112/7 (Route A1 to A2) and the promised bridleway across site B. He will be able to compare this with the current open experience on Route 9b (and indeed many of the other videos).	the ES which accurately illustrate the Scheme in accordance with the methodology presented in **ES Vol 2 Appendix 5-2 [APP-070]**.

3.4 Response to Brian Watson

Table 20: Response to [REP5-035]

Our Ref.	Comment	Applicant Response
BW-D6-01	In addition to my earlier objection I wish to add to my reasons that I am now also concerned that the developer has just confirmed, at this late stage, that the high-pressure gas pipeline that runs alongside the proposed battery storage compound is live. This important point has emerged very late in the Examination and raises more questions about the implications of locating a 100MW BESS alongside nationally significant gas infrastructure.	The Applicant has always acknowledged the locations of gas pipelines which cross the Site, and these have been identified in the application documents since submission in October 2025. The Applicant has never suggested these pipelines were not 'live'. The buried gas pipeline in question was identified in the following submission documents: • Paragraphs 2.5.42-44, and Tables 2-18, 2-21, 2-25, 2-27 of **ES Vol 1 Chapter 2 [APP-038]**; • **ES Vol 3 Figure 2-1k Illustrative Environmental Masterplan [APP-121]**; • **ES Vol 3 Figure 2-3d Indicative Crossings Plan [APP-123]**; In addition, the utilities crossing the Site were considered at paragraphs 16.4.25-26 of **ES Vol 1 Chapter 16 [APP-052]**. Protective provisions for the benefit of National Gas Transmission are included at Part 4 of Schedule 13 of the **draft DCO [REP5-005]**.

3.5 Response to Lisa Marie Chapman

Table 21: Response to [REP5-040]

Our Ref.	Comment	Applicant Response
LMC-D6-01	The applicant has provided documents only days before the deadline and made public with only 4 days for local people to review them. What I am most alarmed at is the siting of the Batteries next to a live gas pipeline. Whilst all measures to protect the enviroment are in place now, experience has taught us that people forget, governments change quickly and regulations along with it. Solar power is always promoted as a safe, environmentally friendly power source. But if not maintained properly, they can pose a risk of fire, either with the batteries or the panels themselves. To be placed so close to a gas pipeline seems unsafe at best, and lethal at worse. Add to the increasingly hot summers, where we are already experiencing field fires due to tinder dry land, I feel this poses a real and significant threat to life and should be reviewed with the utmost urgency and consideration.	The Scheme design includes minimum design buffers to the gas pipeline that have been agreed with National Gas Transmission, which are in line with national standards. Protective provisions for the benefit of National Gas Transmission are included at Part 4 of Schedule 13 of the **draft DCO [REP5-005]**. Protective provisions establish the procedures that must be followed where works could affect National Gas Transmission's pipeline or other infrastructure, including requirements for consultation, approval of detailed works, access, protective or diversionary measures, and responsibility for associated costs or damage.

3.6 Response to Sara Knightley

Table 22: Response to [REP5-044]

Our Ref.	Comment	Applicant Response
SK-D6-01	The applicant is still referring to "outline drainage principles and storage calculations" surely at this stage of the application more definitive data should be made available – the applicant reply does not give an assurance that any firewater will not contaminate the surround land.	The Applicant has addressed the matter of outline design at paragraphs 2.2.21 to 2.2.44 of the **Applicant Response to Deadline 4 Submissions [REP5-023]**. The **outline Surface Water Management Plan (oSWMP) [as updated alongside this submission]** includes hydraulic modelling of the BESS and substation area using the 1% annual exceedance probability storm event with a 40% climate-change allowance. It identifies an attenuation-storage requirement of 1,904 m^3 and an indicative detention basin with a top area of 1,270 m^2, a depth of 1.5 metres and 300 mm freeboard. The drainage design must also accommodate the full 456 m_3 firefighting-water volume. Whilst the final construction details will appropriately be confirmed at the detailed design stage, the necessary capacity has already been established and is secured through Requirement 14 of the **draft DCO [REP5-005]**.
SK-D6-02	The applicant replies that "It requires the National Fire Chiefs Council (NFCC) guidance to be followed to ensure minimum separation distances and emergency access arrangements are established" but this response does not give any assurance that 400m separation distance is sufficient. Will the BESS be re-sited if the NFCC guidance recommends more than 400m?	The 400m figure referenced by the ExA in Q1.1.9 is not a minimum distance prescribed by NFCC guidance. As explained in response to Q1.1.9 in the **Applicant Response to the Examining Authority's First Written Questions [REP3-072]**, the closest residential receptor is approximately 478m from the BESS, with the nearest receptor to the west approximately 495m away. A later revision to the NFCC's (non-statutory) guidance would not, by itself, retrospectively invalidate the DCO or require the BESS to be moved. It would remain necessary for the Site Operator to comply with applicable health and safety legislation and to review and manage risks appropriately throughout the BESS lifecycle.

Our Ref.	Comment	Applicant Response
SK-D6-03	The Applicant states that there are currently no contracts with tenant farmers to graze and manage the use of sheep on the grassland. What measures has the Applicant in place to maintain the grassland should these potential tenant farmers remove their expressions of interest?	The availability of tenant farmers to graze sheep is not relied upon as the sole means of maintaining the grassland. As previously explained with reference to SMW-WR-01 in the **Applicant Response to Written Representations [REP2-044]**, grazing is a preferred management technique because of its agricultural and ecological benefits, but it is not a mandatory component of the Scheme. The secured outcome is the successful establishment and maintenance of the grassland habitats in their specified target condition. The **oLEMP [REP4-101]** therefore provides for both grazing and mechanical management, including an annual August cut by the appointed Landscape and Ecological Maintenance Contractor. Should the existing expressions of interest not result in grazing agreements, or should a grazing arrangement subsequently cease, responsibility for maintaining the grassland would remain with the undertaker or Site Operator. A specialist Landscape and Ecological Maintenance Contractor will be appointed throughout the operational phase, overseen by a suitably qualified Landscape Manager responsible for reviewing progress against the approved LEMP objectives and administering the maintenance contract. The grassland would consequently be maintained by mechanical cutting, with the timing, frequency and other management interventions adjusted where necessary to achieve the required sward height, composition and habitat condition.

3.7 Response to Shaun Woodward

Response to Shaun Woodward in relation to Greenhouse Gas Assessment [REP5-046]

Table 23: Response to [REP5-046]

Our Ref.	Comment	Applicant Response
SW-D6-01	Mr Woodward disputes the Applicant's assumptions used in the greenhouse gas assessment presented at **ES Vol 2 Appendix 15-1 [REP4-021]** and that the assessment insufficiently evidenced or based on optimistic assumptions about the materials used in key components, their places of manufacture, construction and operational fuel consumption, water use, workforce travel and associated transport emissions.	**Greenhouse Gas Emissions Assessment** The Applicant has reviewed the further comments made by Mr Shaun Woodward in his Deadline 5 submission **[REP5-046]** relating to **ES Volume 2, Appendix 15-1: Greenhouse Gas Emissions Assessment [REP4-021]** ('the GHG assessment'). The Applicant does not accept the contention that the matters raised within Mr Woodward's response demonstrate that the Scheme's lifecycle greenhouse gas emissions have been materially understated. The response queries the basis of the GHG assessment in relation to mounting structures, transformers, inverters, fencing, construction fuel, water consumption, worker travel, equipment replacement, waste transportation and recycling. It is proposed that a series of alternative assumptions, emission factors and future scenarios should be substituted for those adopted by the Applicant. The Applicant accepts that lifecycle greenhouse gas assessments necessarily involve assumptions and that alternative assumptions may produce different numerical outputs. The Institute of Sustainability and Environmental Professionals (ISEP) guidance followed in the GHG assessment provides a framework for assessment rather than prescribing one mandatory methodology. The Applicant notes that it provided a response at Deadline 5, which included a response to queries raised over the greenhouse gas assessment and lifecycle carbon savings, see paragraph 2.2.7 to 2.2.20 **[REP5-023]**. The points raised in REP5-023 are relevant to Mr Woodward's response, however, the Applicant has provided further consideration of the matters raised by Mr Woodward below. This approach taken by the Applicant is consistent with the purpose and requirements of environmental impact assessment. The Environmental Statement is required to contain the information reasonably required, having regard to current knowledge and methods of assessment, to reach a reasoned conclusion on the likely significant effects of the development. It is not

Our Ref.	Comment	Applicant Response
		required to model every conceivable permutation of future events or to arrive at a single, objectively correct prediction of the future. In R (Finch) v Surrey County Council [2024] UKSC 20 (the 'Finch' case), the Supreme Court explained at paragraphs 74-78 that determining whether a possible effect is "likely" requires evidence on which that determination can be based, the judgement was clear that "*Conjecture and speculation have no place in the EIA process*". There are several other well-established principles arising from case law which establish the sufficiency of information that is reasonably required to be included within an Environmental Statement, to enable the decision maker to determine the likely significant effects of the proposed development on the environment: • *Information must be sufficient but does not need to be perfect*: the statutory basis lies in the EIA Regulations, which require the ES to contain the information "*reasonably required*" for reaching a reasoned conclusion on the significant effects of the development; • *The "informed decision-making" purpose of EIA*: a well-established principle running through case law authorities is that EIA is a mechanism to ensure informed decision-making, not to eliminate uncertainty. The purpose of an ES is to identify the likely significant environmental effects, explain their significance, allow consultees and the public to understand those effects and enable the decision-maker to reach a reasoned conclusion. • *Information need only be provided to the extent it is reasonably required*: The courts recognise that an ES must be proportionate. • *The Rochdale principle: flexibility is lawful if its environmental consequences are assessed*: an applicant may seek consent for a project with a degree of flexibility, provided that the parameters of the development are adequately defined, the likely significant effects of all realistic outcomes within those parameters are assessed and the decision-maker understands the environmental consequences of granting that flexibility. More recently, R (Boswell) v Secretary of State for Energy Security and Net Zero [2025] EWCA Civ 669 concerned disputes over greenhouse gas assessment methodology, the application of IEMA guidance and the evaluation of significance. It reinforces that the EIA regime does not prescribe one exclusive methodology and that the application of professional guidance and the

Our Ref.	Comment	Applicant Response
		assessment of significance involve matters of expert and planning judgment for the decision-maker. The Applicant does not dispute that there may be alternative assumptions for calculating greenhouse gas emissions, and some of the points raised by Mr Woodward represent possible alternatives to those used by the Applicant. However, it is considered that the principal physical components and lifecycle stages identified by Mr Woodward have already been assessed in the GHG assessment in a reasonable, proportionate and evidenced manner, enabling the likely significant effects of the Scheme to be determined and allowing a reasonable judgement to be made on the planning merits of the Scheme's climate change benefits. In relation to the points raised by Mr Woodward, the Applicant considers that a number of the suggested scenarios are unsupported and speculative rather than evidenced likely effects and in other cases the suggested alternatives would be disproportionate to their contribution to total lifecycle emissions. **Assessment of identified components and activities** The GHG assessment has considered the mounting structures, transformers, inverters, fencing, construction and operational energy use, and the supply and treatment of water. Where the final equipment specification, material composition, source of manufacture or working method cannot yet be known, the assessment applies transparent and reasonable assumptions and recognised emission factors. Mr Woodward identifies a number of alternative variables which could produce different numerical results. Those variables cannot necessarily be applied uniformly to all equipment or activities, or throughout the Scheme's lifetime. Whether they arise, and the extent to which they arise, will depend on matters including the final design, supplier, material composition, procurement route, construction method, maintenance regime, plant selection and source of water. The ISEP guidance recognises that greenhouse gas assessment should be proportionate and focused on sources which are capable of materially influencing the result. Activities or emission sources which would not significantly alter the overall assessment may be excluded. The Applicant is satisfied that, whether considered individually or collectively on a reasonable basis, the alternatives put forward by Mr Woodward would make only a negligible difference to the total lifecycle emissions calculation and would not alter the scale or significance of the assessed

Our Ref.	Comment	Applicant Response
		effect, the substantial net greenhouse gas savings delivered by the Scheme, or the conclusions of the Environmental Statement. **Worker travel** The GHG assessment does not ignore worker travel. For construction workers it assumes that every worker travels individually for a 100 km round trip on each working day, for an average of 19 days per month. This is a conservative assumption because it makes no allowance for local recruitment, car sharing, collective transport or temporary accommodation near the Scheme. Mr Woodward suggests that the construction contract is likely to be awarded to a Greek or Spanish company, that a majority of the workforce would therefore come from those countries and that they would make multiple flights home during construction, replacement and decommissioning. No evidence is provided to establish any of those propositions. The identity and nationality of future contractors have not been determined, contractor nationality would not establish workforce residence, and the frequency or mode of any personal journeys cannot presently be known. These suggestions exemplify the type of conjectural scenario identified in Finch. They depend on a series of undetermined future commercial and personal decisions and are not an evidenced likely effect capable of reliable assessment. **Recycling, disposal and future infrastructure** The assessment conservatively assumes that 50% of the equipment and materials would be recycled and 50% would be disposed of to landfill. It assumes a 100km journey to both a licensed recycling facility and a licensed landfill. It also includes the manufacture and transportation of replacement equipment, transport of replaced equipment, and its recycling or disposal. The 100km assumption is a modelling assumption rather than a prediction that a particular present-day facility will necessarily be used in 2070. Equally, the Mr Woodward's suggestion that the panels should be assumed to be transported to a specified recycling facility in Texas is not an evidence-based likely scenario. It assumes that:

Our Ref.	Comment	Applicant Response
		• present recycling capacity will remain static for several decades; • no additional UK or European facilities will be developed; • the identified Texan operator will remain the only facility capable of accepting the equipment; • the equipment will be exported there notwithstanding future waste regulation and commercial arrangements; and • no nearer recycling, recovery or producer-responsibility route will be available. Those assumptions are questionable in light of the Government's Solar Roadmap, Department for Energy Security and Net Zero, *Solar Roadmap: United Kingdom Powered by Solar* (June 2025). The Roadmap identifies increasing volumes of solar panels reaching end of life, records existing recycling activity and development of more advanced recycling and recovery practices in the UK, and commits government and industry to further work on the likely availability of conventional and innovative recycling practices. It therefore anticipates development of this sector rather than its remaining fixed at present-day capacity. The proportionate approach is to use a reasonable transparent transport assumption, which is the approach taken by the Applicant. **<u>Consistent comparison boundaries</u>** The Applicant set out in REP5-023 that the greenhouse gas comparison exercise should be considered in the context of consistent system boundaries. The operational greenhouse gas intensity of 0.246 gCO_2e/kWh was calculated for comparison with the operational generation-intensity figures presented in **ES Vol 1 Chapter 15 [REP4-014]**. Those comparator figures, published by the Department of Energy Security and Net Zero, expressly exclude fuel-supply-chain and maintenance activities. Mr Woodward's alternative figure of 18.6 gCO_2e/kWh includes maintenance and replacement equipment. It is therefore not comparable with operational generator figures from which equivalent lifecycle and maintenance emissions have been excluded. Adding the Scheme's maintenance and replacement emissions while leaving those emissions outside the comparator creates a potentially misleading comparison, unless this limitation is recognised.

Our Ref.	Comment	Applicant Response
		This does not mean that maintenance and replacement emissions should be excluded from the Scheme's whole-life assessment. To the contrary, they are included within the separate whole-life calculation presented by the Applicant. The distinction is between: • a like-for-like comparison of operational generation intensity; and • the whole-life assessment of construction, operation, replacement and decommissioning emissions. **Alternative assumptions** In suggesting a series of assumptions that could result in higher emissions, albeit in the Applicant's view relatively minor in the context of the total greenhouse gas balance, Mr Woodward has not considered the converse situation. The Applicant has not sought to maximise the stated climate benefit by relying on every potentially favourable future assumption. A range of alternative assumptions could reasonably result in lower lifecycle emissions or greater renewable-energy benefits, including: • equipment operating beyond its warranty period and therefore not requiring complete replacement after 20 years; • partial or targeted replacement rather than wholesale replacement of modules, transformers, inverters, batteries and fencing; • declining embodied emissions as electricity generation and manufacturing processes decarbonise; • replacement components being manufactured in the UK or Europe rather than China; • improvements in panel efficiency, degradation performance and energy yield; • increasing use of electric or lower-emission construction, maintenance and transport equipment; • local recruitment, shared transport and reduced worker travel;

Our Ref.	Comment	Applicant Response
		• higher recycling and material-recovery rates, closer recycling facilities and avoided production of virgin materials; and • inclusion of the potential land-use carbon benefit identified in Appendix 15-1 but not credited within the headline lifetime-emissions calculation. The Applicant does not put these assumptions forward as reliable predictions. They have not been relied upon precisely because the Applicant considers that it would be inappropriate to base the assessment on uncertain future improvements, judgements on the specific components that may be used, or speculative assumptions of why embodied carbon values may well fall over time. Mr Woodward has assembled a series of adverse scenarios, from a range of possible future assumptions, including international worker flights and recycling in Texas, without demonstrating that those scenarios are likely. A reasonable assessment is not required to adopt every adverse possibility while disregarding equally or more plausible factors when assessing the Scheme's lifecycle performance. The Applicant's position is that the matters raised by Mr Woodward are not capable of changing the scale of the assessed greenhouse gas effect in a material way that would alter the conclusions reached. Modifying or refining inputs that align with Mr Woodward's assumptions might produce a different numerical total, but it would not alter the reasoned conclusion that the Scheme would deliver substantial net greenhouse gas savings. This conclusion accords with the applicable national policy framework. NPS EN-1 establishes an urgent need for new energy infrastructure, particularly low-carbon electricity generation, and directs that substantial weight should be given to that need. It does not require the decision-maker to establish the individual contribution of each project to the national need. EN-1 also expressly recognises that the construction, operation and decommissioning of necessary energy infrastructure will themselves generate emissions. The policy objective is to assess and reduce those emissions as far as possible. The assessment conclusion is consistent with the Secretary of State's established approach to nationally significant solar development. Solar NSIP decisions have consistently recognised that large-scale solar provides important renewable-energy, decarbonisation and climate-change benefits, notwithstanding differences between projects in the precise comparator, methodology or numerical estimate adopted. The Secretary of State has continued to grant development consent

Our Ref.	Comment	Applicant Response
		for large-scale solar projects, including Fenwick, Springwell, Dean Moor, Peartree Hill and One Earth during 2026, all of which took slightly different approaches to calculating greenhouse gas emissions, but all identified substantial climate change benefits. The conclusion on whether the Scheme meets the policy requirements of NPS EN-1 does not depend on demonstrating one uniquely correct lifecycle figure. Alternative calculations may produce different estimates of the precise scale of benefit. However, they do not change the established position that the generation of substantial quantities of low-carbon electricity by large-scale solar is necessary to decarbonise the electricity system and carries substantial weight in the planning balance. **Conclusion** The Applicant therefore does not dispute that alternative greenhouse gas calculations can be prepared. However, it does dispute the inference that the existence of those alternatives renders the findings set out in the Environmental Statement deficient or incapable of informing the necessary policy judgements on greenhouse gas emissions. The assessment includes the principal physical components and lifecycle activities identified by Mr Woodward and uses transparent assumptions based on current information. Where precise future details cannot presently be known, reasonable proxies have been used. The assessment has not relied on speculative technological improvements or other assumptions selected to maximise the Scheme's stated benefit. Equally, there is no requirement to replace those reasonable assumptions with a combination of adverse but unsupported assumptions. The additional refinements suggested by Mr Woodward may alter the precise numerical estimate to a limited degree. They would not materially affect the Scheme's total lifecycle emissions, the scale of its net greenhouse gas savings, the assessment of significance or the substantial weight to be afforded to its renewable-energy and climate-change benefits. The Applicant is therefore satisfied that the Environmental Statement provides sufficient information to enable the ExA and the Secretary of State to reach a reasoned conclusion on the likely significant greenhouse gas effects of the Scheme. No further revision to the assessment is necessary to establish that conclusion.

Our Ref.	Comment	Applicant Response

Response to Shaun Woodward in relation to Replacement Works [REP5-047]

Table 24: Response to [REP5-047]

Our Ref.	Comment	Applicant Response
SW-D6-02	Mr Woodward contends that the assumptions the Applicant has used in considering replacement works are optimistic.	The matters raised in **[REP5-047]** substantially repeat the comments made by Mr Woodward in relation to logistics of solar panel replacement in his Deadline 4 submission **[REP4-077]**. The Applicant refers to its response at SW-D5-08 in Section 2.10 above, read together with response BBC-D5-75 in the **Applicant's Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]**.

Response to Shaun Woodward [REP5-050]

Table 25: Response to [REP5-050]

Our Ref.	Comment	Applicant Response
SW-D6-03	**Response to my points SW-D3-01 and SW-D3-02 page 113** Mr Woodward considers that treating replacement works as 'maintenance' weakens Host Authority control and would allow less restrictive use of the local road network, arguing that the Applicant is likely to favour a compressed replacement programme, potentially concentrating traffic and associated emissions, and therefore considers that construction, replacement and decommissioning should all be subject to the same DCO traffic controls.	The Applicant has provided responses in relation to replacements with reference to Table 1 responding to Bedford Borough Council in the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]**, and in Table 12 (above) of this document responding to Stop East Park Energy. The updated **oOEMP [as updated alongside this submission]** distinguishes between Routine Replacement Works, Planned Panel Replacement Campaigns and Major Replacement Campaigns. A Replacement Register must record all panels replaced, including those replaced under separate contracts or programmes. No replacement work may cause the cumulative total to exceed 20% within a rolling 12-month period unless the Major Replacement Campaign approval has first been obtained. The **oOEMP [as updated alongside this submission]** identifies an indicative panel life of 20 to 40 years and requires replacement decisions to be informed by inspections of condition and performance. Panels may be replaced at different times because of faults, damage, deterioration, obsolescence, compatibility issues or technological change. Nevertheless, **ES Vol 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2]** now includes a sensitivity assessment of the replacement of 100% of the panels within a single campaign. The potential for a commercially accelerated programme has therefore not been excluded from the assessment. Traffic movements during the operational phase (and replacement works) would remain subject to the Operational Access Strategy set out in the **oOEMP [as updated alongside this submission]**. The

Our Ref.	Comment	Applicant Response
		Applicant has set a limit on the number of crews and HGV vehicle movements each day. It would therefore not be necessary or proportionate to apply the construction phase traffic controls.
SW-D6-04	**Response to my points SW-D3-03** Mr Woodward remains concerned that the Host Authorities will not have sufficient resources to monitor and enforce compliance with the DCO throughout the Scheme's lifetime.	The Applicant has engaged with BBC and HDC regarding post consent cost arrangements, and both parties are now agreed with the Applicant on this matter (refer to BBC-D5-01 and HDC-05-02 in the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]**). The amended statutory fees regime now provides the Host Authorities with a route to recover reasonable costs post consent, including reviewing management plans and monitoring reports, undertaking inspections and obtaining specialist technical advice.
SW-D6-05	**Response to my points SW-D3-04** Mr Woodward considers that there are no physical means of controlling construction and commuting traffic from using the local road network whatever the DCO states. In addition, he questions how compliance with the approved routes would be monitored and enforced in practice.	Compliance will be secured through prescribed routes, delivery bookings, contractual instructions, traffic monitoring, records, signage, investigation of reported breaches and corrective action. The **oCTMP [REP4-095]** requires HGVs to be identifiable from other traffic and requires data to be collected concerning vehicle routes, timings and speeds. Compliance with the prescribed HGV routes will be monitored through either an automatic number plate recognition system or GPS-based geofencing. The final system, monitoring responsibilities and monitoring timetable must be included in the final CTMP approved by the relevant planning authority following consultation with the highway authority.
SW-D6-06	**Response to my point SW-D3-06** Mr Woodward considers that his calculations of traffic movements indicate materially more vehicle movements than the Applicant's assessment, particularly when replacements and decommissioning are included.	The Applicant has undertaken a further review of Mr Woodward's original calculations in **[REP1-152]** and subsequently within **[REP3-105]**. The Applicant disagrees that those calculations demonstrate a material error in either the traffic or greenhouse gas assessments. Mr Woodward's headline figure of approximately 724,000 vehicle movements is not a direct comparator with the assessment made

Our Ref.	Comment	Applicant Response
		by the Applicant within the ES. **ES Vol 2 Appendix 9-1 [REP4-019]** identifies 5,402 HGV deliveries and 790 LGV deliveries, equating to 12,384 two-way delivery movements during the construction phase. Traffic movements from the construction workforce are identified and assessed separately. Mr Woodward's figure instead combines HGV and LGV deliveries with workforce movements across construction, 40 years of operation, replacement works and decommissioning. This single undifferentiated total over the Scheme's lifetime does is not an appropriate measure of traffic and transport impacts and effects. There are also inconsistencies or errors in Mr Woodward's calculations, which include approximately 676,448 movements, or 93% of the total claimed by Mr Woodward. On page 6 of **[REP1-152]**, values which are described as the 'number of movements' are entered again as 'trips to site' and then again doubled in the final 'to and from movements' column of the table. In the operational row, 150,000 worker attendance days become 300,000 movements and are then doubled again to 600,000. The construction row also describes 14,866 ' total number of man days', although that figure is simply the average workforce of approximately 495.5 multiplied by 30 months and does not account for the working days within each month. Similar inconsistencies between deliveries and movements appear in a number of the workforce and HGV lifecycle calculations. Mr Woodward also acknowledges using generic and artificial intelligence derived component specifications and that those estimates may not be perfectly accurate. The Applicant's position is that the spreadsheet does not represent a consistent or reliable alternative traffic assessment. The Applicant has applied an appropriate methodology to the assessment and ES Vol 2 Appendix 9-1 Transport Assessment **[REP4-019]** considers the vehicle class, route, distribution and daily and peak flows that are capable of affecting the local highway network. It assesses a peak of 60 two-way HGV movements per

Our Ref.	Comment	Applicant Response
		day, rather than relying only on an average. Bedford Borough Council and Cambridgeshire County Council have confirmed that the trip generation appraisal follows a robust methodology and have not raised concerns regarding the assessed construction traffic volumes. There is agreement with the Host Authorities and National Highways on the study areas, methodology, baseline data and assessment conclusions in respect of the traffic and transport impacts and effects, which is reflected in the Statements of Common Ground with Bedford Borough Council and Cambridgeshire County Council **[REP5-019, REP5-021]**. The Applicant considers that the traffic assessment is robust, precautionary and more than adequate to enable a reasoned conclusion on the Scheme's likely significant effects. In relation to greenhouse gas emissions, emissions have been calculated using the relevant activity data, transport distances and emission factors. The assessment of greenhouse gas emissions is also covered further under SW-D6-01 in Table 23 above.
SW-D6-07	**Response to my point SW-D3-07** Mr Woodward considers that the Applicant's diesel-use figures cannot be relied on as small errors or underestimates can impact disproportionately on CO_2 figures.	The 864,000 litre diesel assumption relates to the use of construction plant and generators (not vehicle movements to / from site) and 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. Over a 30 month period this breaks down as an average of approximately 6,640 litres a week. In the Applicant's experience this is a reasonable assumption to make. It is noted that that, with reference to Table 16 of **ES Vol 2 Appendix 15-1 [REP4-021]** this equates to 0.7% of the total estimated greenhouse gas emissions during the construction

Our Ref.	Comment	Applicant Response
		phase. Any marginal difference of either less or more fuel usage would not materially change the conclusions of the ES. The Applicant also refers to response SW-D6-01 in Table 23, above.
SW-D6-08	**Response to my point SW-D3-09** Mr Woodward considers that retaining planting after decommissioning is inconsistent with claiming the Scheme is temporary.	The Scheme is temporary because the consent for the electricity generation is time-limited and will cease at the end of 40 years from first commissioning, with decommissioning secured by the **draft DCO [REP5-005]**. The retention of mature planting does not make the Scheme permanent – at decommissioning the planting will form part of the established landscape and ecological network, and has been designed to be consistent with the characteristic pattern of local hedgerows, trees and woodland. The removal of planting to recreate the precise pre-development baseline would cause unnecessary landscape and ecological harm and would not be required to secure the temporary nature of the Scheme.

3.8 Response to Simon Lane

Table 26: Response to [REP5-048]

Our Ref.	Comment	Applicant Response
SL-D6-01	Section 3-5.4 – Flooding encroaching onto the BESS Compound 150-300mm to be managed by SUDS drainage – my query is how? Regards flooding to the BESS, the developer should demonstrate that the SUDS drainage system will be capable of restricting flooding to that area to an acceptable level without downstream detriment.	As previously explained in response to SCEL-D3-01 in the **Applicant's Response to Deadline 3 Submissions – Other Interested Parties [REP4-109]**, the two minor mapped flow routes originate within the proposed compound footprint and are principally the result of rainfall falling on that area under the existing, pre-development conditions. Once developed, rainfall within the impermeable BESS and substation compounds will no longer be permitted to form uncontrolled overland flow. The capacity of the drainage system has been modelled using Causeway Flow to calculate the storage required for the BESS and substation area during the 1% annual exceedance probability event with a 40% climate-change allowance. Discharge from the drainage system will be restricted to the equivalent greenfield runoff rate for the design event, rather than releasing the rainfall falling on the compound without attenuation.
SL-D6-02	Section 4.1.18 – Panelling in archaeologically sensitive areas to be supported on Precast Cast Concrete foundations in lieu of piles. The flood modelling will have to be re-run when the full extent of the archaeology is known. If the archaeology proves to be significant this could have a major effect on the viability of the scheme.	The potential hydraulic effect of any pre-cast concrete foundations has been assessed at section 6.1.2 of the **Hydraulic Modelling Report [REP4-107]**.