

This submission and accompanying annex arise from my observation, whilst driving the B645 on 22 August 2026, of construction signs for the High Wood Solar Farm. The submission raises three matters: first, that the Applicant's Chapter 17 cumulative assessment was based on construction timelines that now appear to have been materially overtaken by events; second, that the B645 — the only direct route for an entire cluster of villages — will face concurrent construction traffic from High Wood and East Park simultaneously, earlier than Chapter 17 modelled; and third, a question about grid connection capacity at Eaton Socon. The submission also addresses solar clustering, the PS Manor Farm Solar land rights issue, BMV land and food security in the current national context. An annotated cumulative map is provided as an annex.

EAST PARK ENERGY (EN010141)

Deadline 7 Submission

Cumulative Solar Development: Assessment Overtaken by Events, Solar Clustering, and Grid Connection Capacity at Eaton Socon

Submitted by: M T Benford

Interested Party Reference: [REDACTED]

Date: August 2026

1. Why I Am Writing This Now

1.1 I live in Great Staughton and drive the B645 regularly. On Saturday 22 August 2026, coming back from St Neots, I noticed construction signs for the High Wood Solar Farm. This surprised me. I knew High Wood had been approved — it had come up in my research into this examination — but I had not realised construction was already beginning. It immediately prompted two thoughts that I believe are directly relevant to this examination.

1.2 The first thought was straightforward: High Wood is right next to the East Park Energy site. If it is already under construction, then the East Park cumulative assessment — which I went away and read carefully — may have been based on construction timelines that are no longer accurate. They did assess High Wood and Cobholden in Chapter 17 of the Environmental Statement. But they assessed them on the basis of assumed construction programmes that now appear to have been overtaken by what is actually happening on the ground.

1.3 The second thought was harder to ignore because I was sitting in it. The B645 — the road I had just driven — is the only direct route east for everyone in Great Staughton, Hail Weston, Kimbolton, Tilbrook, and the surrounding villages. It is not one of several options. It is the only one that is remotely practical for daily life — for going to work, taking children to school, visiting the doctor, getting to St Neots, reaching the railway. The alternative via East Perry and Buckden is 11 miles and 19 minutes compared to 4.4 miles and 6 minutes on the direct route. Nobody is going to add 13 minutes each way to every journey for three years. And now, if High Wood is already starting construction, that road will be carrying the traffic of two major solar farms simultaneously, potentially much sooner than anyone modelled.

1.4 This submission addresses three things: whether the cumulative assessment still holds up given the actual construction timeline now emerging; what that means for the B645 and the communities that depend on it; and a separate concern about whether the grid connection capacity at Eaton Socon can actually accommodate everything being claimed. An annotated map showing the spatial relationship between all the solar schemes in this area is provided as an annex.

2. The Cumulative Assessment Was Based on Timelines That Have Been Overtaken

2.1 I want to be clear about what I am and am not arguing here. Chapter 17 of the Environmental Statement (document reference EN010141-000189) does assess High Wood Solar Farm and Cobholden Solar Farm as cumulative schemes. I am not saying they were ignored. What I am saying is that the conclusions drawn from that assessment were based on assumptions about when construction would happen that now appear to be wrong — and that matters, because the conclusions follow directly from those assumptions.

2.2 On High Wood specifically, Chapter 17 paragraph 17.4.59 states that construction 'will need to commence by December 2027 at the latest.' Paragraph 17.4.60 then builds on that with a 40-week construction programme estimate. But I observed construction signs for High

Wood on 22 August 2026 — more than 16 months before the assessment assumed construction would even need to begin. If construction is already starting or imminent, then the assessment's conclusions about cumulative effects being 'temporary, experienced in the short-term, and reversible' were based on a timeline that simply does not reflect what is actually happening.

2.3 On Cobholden, Chapter 17 paragraph 17.4.65 is even more striking. It says construction would commence 'in late-2025' with the development 'likely to be operational by late-2026 / early-2027.' If that is correct, Cobholden is already under construction and will be operational before East Park's own construction even begins. The assessment treated it as a future scheme. It may now be a current reality.

2.4 I am therefore asking the Examining Authority to require the Applicant to confirm the actual current construction status of both High Wood and Cobholden, and to address whether the Chapter 17 cumulative conclusions still hold given that the actual construction programmes appear to be running considerably ahead of what the assessment modelled.

3. This Area Is Becoming a Solar Cluster — and the Evidence Is in the Examination Record Itself

3.1 The Applicant has consistently resisted any suggestion that this area is heading towards a solar cluster. But when I read Chapter 17 carefully, I found something unexpected: the Applicant's own assessment acknowledges exactly that. Paragraph 17.4.20 states that 'the Scheme would result in an increased concentration of solar development in this part of the Southern Wolds LCA.' Paragraph 17.4.21 uses almost identical language. Yet the overall conclusion is that cumulative landscape effects are Not Significant — reached by pointing to the large scale of the Southern Wolds LCA and anticipated planting. That conclusion has already been directly challenged by Rebecca Condillac of AECOM, the landscape expert retained by the host authorities, who told ISH3 on 9 June 2026 that there is 'some under-representation of significant effects' in the Applicant's LVIA. I would ask the Examining Authority to weigh those two positions carefully.

3.2 But there is further evidence of clustering that goes beyond landscape assessment methodology, and it is sitting in the examination record for anyone to see. The Applicant's own thematic response document devotes a substantial section to responding to Eaton Socon Power Limited — the Cobholden developer — which has objected to the East Park scheme. There is a separate section responding to Nextpower SPV 16 Ltd, another solar developer. And most recently, PS Manor Farm Solar Limited, represented by Osborne Clarke solicitors, has entered the examination as a late-arriving objector, directly causing the Rule 8(3) timetable extension of 20 August 2026 that pushed the close of examination to 16 September 2026.

3.3 I have now read the Nextpower SPV 16 Ltd relevant representation, filed on 14 January 2026, and it is directly relevant to both the clustering argument and the construction traffic argument. Nextpower SPV 16 Ltd is the owner of High Wood Solar Farm — the scheme whose construction signs I observed on 22 August 2026. Their representation states that the High Wood consented development is 'located immediately adjacent to, and in some areas abutting, the land subject to the above NSIP application.' That is not a scheme at some distance from East Park — it is a scheme that shares a boundary with it. Nextpower's representation raises specific concerns about 'safety and logistics conflicts during overlapping construction periods' and asks for 'a Construction Interface Strategy demonstrating how both schemes can coexist without prejudicing the delivery of our consented project.' That is a developer-level confirmation, from the owner of the adjacent scheme, that the cumulative construction concern I raise in Section 4 below is real. I do not have access to the full text of the Eaton Socon Power Limited objection, and I am not trying to characterise what it says beyond what is visible from the examination record.

3.4 The PS Manor Farm Solar situation is particularly striking, and I can speak to it directly because I have now read the Osborne Clarke letter. It confirms that PS Manor Farm Solar Ltd is the operator of an existing solar farm at Manor Farm, Pertenhall, Bedfordshire — which adjoins and is, in part, surrounded by the land proposed for East Park Energy. Not nearby. Partially surrounded. Pertenhall is the location of East Park's Site A, lying west of the B660. If there is already an operational solar farm there that is partially enclosed within the East Park order limits, it should appear in the Chapter 17 cumulative baseline as an existing operational scheme. I have read Chapter 17 and Manor Farm Solar does not appear in it. Stop East Park Energy have told me they believe it was scoped out. I would ask the Examining Authority to confirm whether this is correct and, if so, on what basis.

3.5 The Osborne Clarke letter also makes a serious point about how PS Manor Farm Solar's position has been represented in the Land Rights and Negotiation Tracker — a statutory document in this examination. Their solicitors state clearly that their client has not been corresponding on this matter since 2021, has not appointed an agent, and has not been contacted about negotiations at all. They say their client was not even notified of the DCO submission. The Tracker apparently said otherwise. The Examining Authority has already noted concerns about the accuracy of the tracker in the Rule 8(3) letter — the letter that extended the examination as a direct consequence of this objection.

3.6 Taken together — the Applicant's own acknowledgment of an increased concentration of solar development, the professional challenge to the LVIA methodology, the active disputes with three solar operators, and the confirmation that an existing operational solar farm is partially surrounded by the East Park order limits — I find it difficult to understand how the Examining Authority can conclude that there is no solar clustering in this area.

4. The B645: The Only Road, for Every Journey, for Every Village

4.1 Chapter 17 paragraph 17.4.61 confirms what I already knew from driving it: the High Wood Solar Farm accesses from the A1 via the B645, with its site entrance at Sharp's Barn approximately 700 metres west of the A1. During peak High Wood construction, Chapter 17 paragraph 17.4.62 forecasts approximately 40 two-way movements per day on that road, including around 8 daily two-way HGV movements. The Chapter 17 assessment describes the cumulative impact as 'limited to link 1' — the B645 stretch between the A1 and the B660. That is precisely the stretch I drive.

4.2 But the Chapter 17 assessment made that calculation on the basis that High Wood construction would not start before December 2027. I saw the construction signs in August 2026. If that assessment is now 16 months out of date, the overlap between High Wood and East Park on the same road could be far greater — and arrive far sooner — than anyone planned for.

4.3 I want to explain why this matters so much to the people who live here, because I am not sure it comes across in the technical documents. The B645 is not a road that happens to be used by commuters and school buses. It is the only road. For everyone in Great Staughton, Hail Weston, Kimbolton, Tilbrook, and the villages along this corridor, there is no realistic alternative for reaching the A1, St Neots, the shops, the schools, the railway, the hospital, the doctor. The alternative via East Perry and Buckden is 11 miles and takes 19 minutes. The direct route is 4.4 miles and takes 6 minutes. That is not a minor inconvenience — adding that detour to every journey, twice a day, for potentially three years, would be a serious and sustained impact on daily life for everyone in these villages.

4.4 This point was made at the first Open Floor Hearing on 17 March 2026. Multiple people spoke about it — about the school buses to Kimbolton School and Longsands Academy, about the commuter traffic, about the Cleve Hill precedent where 'Golden Hours' embargoes were required to allow communities to function during construction. The Examining Authority's own closing action points from that hearing directed that school times and commuting times be considered for a firm DCO requirement. I filed a separate

supplementary submission on this under reference S7CC2614C. That action point, as far as I can see, remains unresolved.

4.5 Now add High Wood to the picture. High Wood also accesses via the B645. Its construction traffic will be on the same road. If, as the construction signs suggest, its construction phase is already beginning, then for a period that East Park's own Chapter 17 did not model, these villages will be dealing not just with East Park's construction traffic but with concurrent construction traffic from High Wood as well — on a road that already has a documented accident history including a fatal collision between a car and an HGV. It is worth noting that Nextpower SPV 16 Ltd — High Wood's owner — has itself asked for a Construction Interface Strategy in its relevant representation, specifically to address 'safety and logistics conflicts during overlapping construction periods.' If the two developers recognise that a Construction Interface Strategy is needed, it follows that the residents who live on the only road connecting those construction sites to the A1 are entitled to know what that strategy is and how it addresses the cumulative impact on communities who have no alternative route.

4.6 I am asking the Examining Authority to require the Applicant to confirm the actual High Wood construction timeline, to address whether the Chapter 17 B645 traffic conclusions remain valid on that timeline, and to confirm whether the school and commuting times action point from OFH1 has been addressed in any document — and if so, which one — on the basis of the combined East Park and High Wood traffic rather than East Park's traffic alone.

5. The Grid Connection and What the Scheme Will Actually Generate

5.1 Clearstone Energy is developing a co-located solar and storage project connecting to the National Grid substation at Eaton Socon — the same substation East Park proposes to use — and has confirmed it has secured a Gate 2 connection. East Park's solar element also has a Gate 2 offer. But East Park's BESS remains at Gate 1, with National Grid not currently progressing any design work for it. There are therefore at minimum two Gate 2 solar connection offers at Eaton Socon, plus East Park's unresolved Gate 1 BESS position.

5.2 I am not in a position to say whether Clearstone's connection conflicts with East Park's — that requires technical information about substation capacity that I do not have. But I do think it is reasonable to ask the Examining Authority to satisfy itself that there is sufficient capacity at Eaton Socon for East Park's full scheme, including the BESS, before the end of the Examination.

5.3 Which brings me to a broader point that Roy, my husband, keeps raising and that I think deserves to be on the record. The scheme is classified as a 400MW NSIP on the basis of its nameplate capacity. But solar panels in Cambridgeshire do not generate at 400MW. The Department of Energy Security and Net Zero's own published data for 2024 puts the UK solar capacity factor at 9.4% — a figure that was raised at the Compulsory Acquisition Hearing on 10 June 2026. At that capacity factor, the average continuous power equivalent of this scheme is somewhere in the region of 37 to 38MW. That is barely above the output of the existing operational Top Farm and Little Staughton Airfield scheme at 40MW — a scheme that occupies a fraction of the land.

5.4 The BESS can only store and discharge energy that the solar panels actually produce. Its grid balancing contribution is therefore constrained by that intermittent, weather-dependent output — not by the 100MW nameplate figure. I am not asking the Examining Authority to refuse the scheme on this basis. But I do think it matters that the benefits attributed to the scheme in the recommendation report should reflect what it will realistically deliver, not what its nameplate capacity implies it could deliver on a perfect day.

6. BMV Land and Food Security: A Changed Context

6.1 My original Relevant Representation, filed in December 2025, raised the best and most versatile agricultural land question as a material consideration under NPS EN-1. The site is predominantly Grade 2 and Grade 3a BMV land — approximately 74-75% of the 1,900-acre site — and at the time I noted this as one of the highest BMV proportions ever presented for a solar NSIP. That point stands. But the context in which it now falls to be weighed has changed materially since December 2025, and I think the Examining Authority should have the current position before it.

6.2 In February 2026, the Sustainable Food Trust published an analysis of a UK Government security report produced by the Joint Intelligence Committee — comprising the heads of MI5, MI6 and GCHQ — titled 'Global Biodiversity Loss, Ecosystem Collapse and National Security.' This report was initially blocked by Downing Street and only released following a Freedom of Information request by the Green Alliance. The report states in terms: 'Without significant increases in UK food system and supply chain resilience, it is unlikely the UK would be able to maintain food security if ecosystem collapse drives geopolitical competition for food. The UK relies on imports for a proportion of both food and fertiliser and cannot currently produce enough food to feed its population based on current diets.' The report also states directly that 'the UK does not have enough land to feed its population.' (Sustainable Food Trust, Can the UK feed itself in the face of ecosystem collapse?, sustainablefoodtrust.org, 3 February 2026.)

6.3 This is not a campaigning organisation's opinion. It is the UK's own intelligence community's assessment of national food security, published in 2026. Against that backdrop, the food security provisions of NPS EN-1 — which require the Examining Authority to consider whether the proposed use of BMV land is justified, having regard to the need for the development and the availability of alternatives — take on a weight they would not have carried even a year ago. The government's own intelligence assessment says the UK cannot currently produce enough food to feed its population and does not have enough land to do so. The scheme proposes to permanently remove approximately 1,425 acres of Grade 2 and Grade 3a BMV land from agricultural production for 40 years.

6.4 The current harvest position adds immediate, local context to that strategic assessment. Analysis published by the Energy and Climate Intelligence Unit on 5 August 2026 confirms that the 2026 harvest is on track to be the worst on record, going back to 1984 when detailed Defra data begins, with a projected shortfall of up to 2.5 million tonnes and losses to UK arable farmers of between £305 million and £390 million. July 2026 was the driest on record in England and Wales, with a near-total absence of rainfall since mid-June concentrated in the East of England — the region where this site sits. A further ECIU commentary on 10 August 2026 noted that the National Drought Group had assessed that more than two thirds of England is now in drought, and that England has now had three droughts in five years. (ECIU, Impact of heatwaves and drought on UK harvest prospects in 2026, eciu.net, 5 August 2026; ECIU, Over two-thirds of England now in drought, eciu.net, 10 August 2026.)

6.5 I want to be careful about how I frame this, because there is an argument that runs in the opposite direction — that poor harvests and climate stress demonstrate the need for renewable energy, and that drought-affected land might as well be used for solar. I do not accept that argument in this context, and I think the distinction matters. Grade 2 and Grade 3a BMV land is not marginal agricultural land. It is the opposite: it is the land with the deepest topsoil, the best soil structure, and the greatest inherent resilience to climate variability. The NPS EN-1 food security provisions protect BMV land specifically because it represents the most durable and productive agricultural resource — the land that will still be productive under climate stress when poorer quality land struggles. A bad harvest on good land is a reason to protect that land for the long term, not to remove it from production. What becomes marginal under climate change is poorer quality land, Grade 3b and below.

Removing Grade 2 and 3a land from production for 40 years is removing precisely the land the government's own intelligence assessment identifies as most needed.

6.6 The proportionality question therefore falls to be weighed in this context: approximately 1,425 acres of the most resilient agricultural land in Cambridgeshire, permanently removed from food production for 40 years, at a time when the government's own intelligence community has assessed that the UK cannot currently produce enough food to feed its population and does not have enough land to do so — in exchange for an average continuous power equivalent of approximately 37-38MW at the UK solar capacity factor of 9.4%. That is barely above the output of the existing operational Top Farm and Little Staughton Airfield scheme at 40MW, which occupies a fraction of the land. I am not arguing that renewable energy and food security are simply opposed. But I do think the Examining Authority should weigh both the actual energy benefit on realistic output figures and the food security cost in its proper national context before concluding that this use of BMV land at this scale is justified.

7. What I Am Asking the Examining Authority to Do

7.1 I am asking the Examining Authority to require the Applicant to address the following six points before the end of the Examination on 16 September 2026:

- (a) What is the current actual construction status of High Wood Solar Farm and Cobholden Solar Farm, and do the Chapter 17 construction timeline assumptions remain accurate? Construction signs were observed at High Wood on 22 August 2026 — over 16 months before the assumed December 2027 commencement. Chapter 17 stated Cobholden construction would begin in late-2025. The Applicant should confirm the current position for both.
- (b) Do the Chapter 17 cumulative landscape, visual, and traffic conclusions remain valid on the actual construction timelines now unfolding? In particular, does the conclusion that cumulative effects are temporary, short-term, and reversible still hold when High Wood construction appears to be already beginning?
- (c) Does the Applicant maintain that there is no solar clustering in this area? If so, how does it reconcile that position with its own Chapter 17 language acknowledging an increased concentration of solar development, AECOM's professional challenge to the cumulative LVIA methodology, the active disputes with at least three solar farm operators, and the confirmation that an existing operational solar farm at Manor Farm, Pertenhall is partially surrounded by the East Park order limits?
- (d) Does the Chapter 17 cumulative B645 traffic assessment remain valid if High Wood construction commences materially earlier than December 2027? Has the school and commuting times action point from OFH1 been addressed in any submission document — and if so, which one — on the basis of the combined East Park and High Wood traffic?
- (e) What is the current position on available capacity at Eaton Socon substation, having regard to Clearstone Energy's Gate 2 connection offer? Does this have any bearing on the deliverability of the BESS connection, which remains at Gate 1?
- (f) On what basis will the recommendation report attribute substantial weight to the scheme's claimed generation output and grid balancing benefits, having regard to the UK solar capacity factor of 9.4% cited by the Department of Energy Security and Net Zero for 2024, which places the scheme's average continuous power equivalent at approximately 37-38MW? Has the BESS's claimed grid balancing contribution been assessed on the basis of that realistic average output?

8. Conclusion

8.1 I started writing this because I noticed a sign on a Saturday afternoon drive home. What I found when I went back to the examination documents surprised me: an assessment whose conclusions appear to be based on construction timelines that may already be out of date, an applicant whose own words acknowledge a concentration of solar development whilst concluding it is not significant, and a statutory document that appears to have misrepresented the engagement position with an operator whose solar farm is partially surrounded by the proposed development. I appreciate this is a complex examination with many competing interests. But I live here, I drive this road, and I think these are real questions that deserve real answers before the end of the Examination. I am grateful for the opportunity to put them on the record.

EAST PARK ENERGY (EN010141)

Annex to Deadline 7 Submission

Cumulative Solar Development in the LVIA Study Area

Annotated map and explanatory narrative

1. Purpose of this Annex

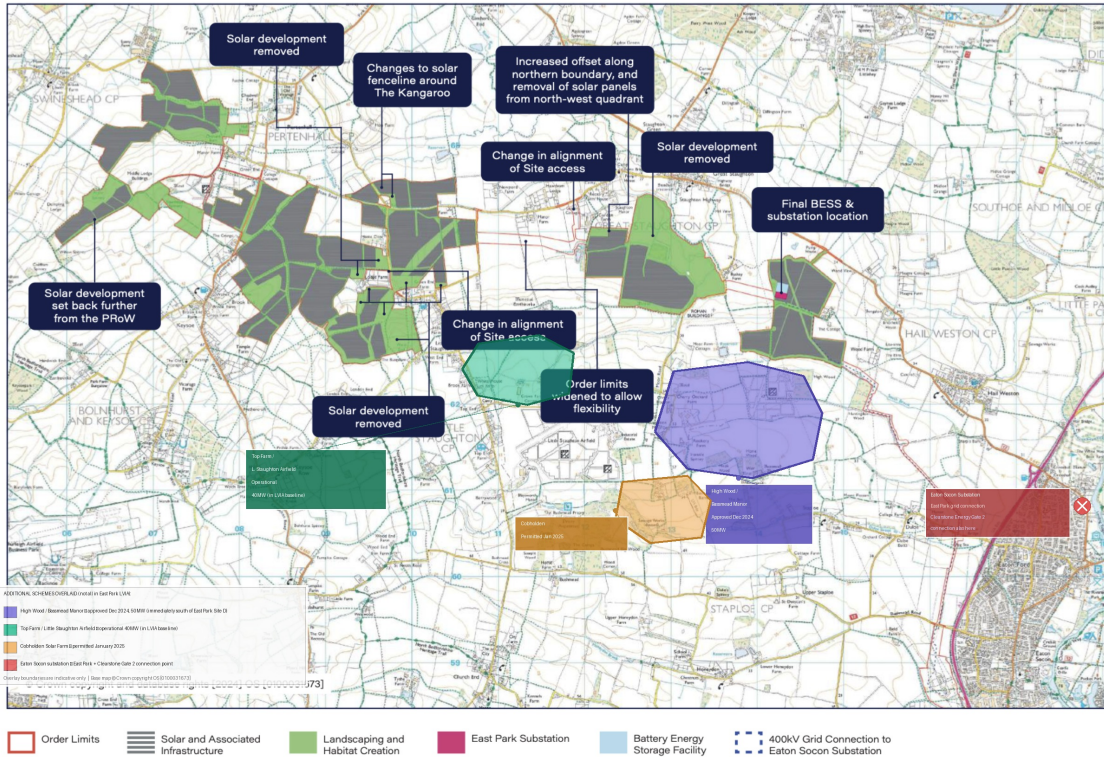
1.1 This annex accompanies my Deadline 7 written submission on cumulative landscape and visual impact. It presents an annotated map showing the spatial relationship between the proposed East Park Energy development (Sites A to D) and the other solar farm developments already operational, consented, or permitted within the same landscape study area. I have produced it to make the cumulative picture visible in a single image — something that I found was not easy to piece together from the documents alone.

1.2 The coloured overlays showing the additional schemes are indicative only. Their boundaries are approximate, drawn from I's knowledge of the relevant planning applications, and are intended to convey the relative scale, location, and proximity of each scheme rather than their precise order limits. The primary record of each scheme's boundaries is the relevant planning application or DCO documentation.

2. The Map

2.1 The base map below is taken from the Applicant's own site layout document submitted to this examination, which itself uses Ordnance Survey mapping data (© Crown copyright and database rights [2024] OS [0100031673]). The Applicant's original annotations — showing the four East Park Energy sites (dark grey), landscaping and habitat creation areas (green), the BESS and substation location (pink/blue markers), the 400kV grid connection corridor to Eaton Socon substation (dashed blue line), and the Applicant's own design evolution callout boxes — are reproduced exactly as submitted.

2.2 The coloured polygon overlays for High Wood / Bassmead Manor (purple), Top Farm / Little Staughton Airfield (teal), and Cobholden (amber) have been added by me for the purpose of this annex, to show the cumulative context not visible on the Applicant's own map. The Eaton Socon substation marker (red) has also been added to identify the shared grid connection point referenced in the written submission.



Base map: East Park Energy site layout, reproduced from examination library document EN010141. Ordnance Survey data © Crown copyright and database rights [2024] OS [0100031673]. Coloured overlays added by submitter — indicative only.

Map key

	East Park Energy Sites A–D (proposed NSIP, 400MW) — as shown on the Applicant's own site layout map
	High Wood / Bassmead Manor Solar Farm (approved December 2024, up to 50MW) — overlay added by submitter
	Top Farm / Little Staughton Airfield Solar Farm (operational, 40MW) — overlay added by submitter
	Cobholden Solar Farm (permitted January 2025) — overlay added by submitter
	Eaton Socon National Grid substation — grid connection point for East Park Energy and Clearstone Energy

Note: The applicant's original site layout map shows East Park Energy's four sites and associated infrastructure in dark grey and green. The three coloured overlays and the Eaton Socon substation marker have been added by I and were not part of the original document.

3. Narrative Description of the Cumulative Picture

3.1 East Park Energy (Sites A to D)

The proposed East Park Energy development (EN010141) covers four discrete solar generation sites — A, B, C, and D — connected by underground cable corridors, with a 400kV grid connection running east to the Eaton Socon National Grid substation. The total generation capacity is 400MW with 100MW co-located battery energy storage (BESS). Site A lies west of the B660 near Pertenhall and Swineshead. Site B lies between Pertenhall, Keysoe, and Little Staughton. Site C lies south of Great Staughton north of the River Kym. Site D lies between Great Staughton and Hail Weston around Pastures Farm. Together the four sites and cable corridors cover approximately 773 hectares of order limits, of which 74–75% is Grade 2 or Grade 3a best and most versatile agricultural land. The scheme is currently being examined as a Nationally Significant Infrastructure Project under case

reference EN010141. The site layout shown on the base map is taken from the Applicant's own examination documents.

3.2 High Wood / Bassmead Manor Solar Farm (approved December 2024)

The High Wood Solar Farm (Huntingdonshire District Council reference 22/01813/FUL) was approved on 4 December 2024. It comprises a solar farm generating up to 50MW located on land on Kimbolton Road, Hail Weston. The East Park Energy Environmental Statement's own long list of other development (Appendix 4-4) records this scheme as located less than 0.1km from the East Park order limits. The annotated map makes plain that this understates the significance of the proximity: the High Wood scheme sits immediately south of and directly abutting the East Park Site D southern boundary, forming a continuous arc of solar development when viewed together with East Park's Site D. The scheme's own Landscape and Visual Impact Assessment, prepared in February 2022, identified Great Staughton and Staughton Highway Conservation Areas and Hail Weston as visual amenity receptors — the same receptors assessed in the East Park Energy LVIA. The Bassmead Manor and Home Wood Solar Farm (Bedford Borough Council reference 22/01998/MAF) is a cross-boundary extension of the same site, also approved on 4 December 2024, described in media reports as partially encircling the existing Top Farm solar farm. Construction signs for the High Wood Solar Farm were directly observed on 22 August 2026 whilst driving along the B645, indicating that the scheme is at or approaching the construction phase. The approximate location of the scheme shown on the overlay has been drawn by I from the planning application documents; the Ordnance Survey base map itself carries the field name "High Wood" at the relevant location, confirming the scheme's position.

3.3 Top Farm / Little Staughton Airfield Solar Farm (operational, 40MW)

The Top Farm and Little Staughton Airfield solar farm (40MW) is already operational. It sits on the Little Staughton Airfield site, which is clearly identifiable on the Ordnance Survey base map, and connects via a substation in Hail Weston parish. Planning conditions for this scheme are currently being discharged (reference 25/80286/COND). This scheme was present in the East Park Energy LVIA baseline as an existing operational development. The overlay confirms its position immediately south-west of East Park Site D, completing the picture of continuous solar development across this landscape when High Wood, Top Farm, and East Park are considered together.

3.4 Cobholden Solar Farm (permitted January 2025)

The Cobholden Solar Farm (Bedford Borough Council reference 24/00858/MAF) was permitted on 31 January 2025. It is located to the south of the East Park Energy order limits, in the Staploe area. Like the High Wood scheme, it was consented after the East Park Energy Environmental Statement was prepared and does not appear in the submitted LVIA cumulative assessment as a consented scheme. Its approximate position is shown on the overlay, drawn from the planning application documents.

3.5 Clearstone Energy at Eaton Socon substation

Clearstone Energy is developing a co-located solar and storage project that will connect to the National Grid substation at Eaton Socon — the same substation to which East Park Energy's 400kV grid connection runs, as shown on the base map. Clearstone has publicly confirmed it has secured a Gate 2 connection for Phase 1 of the Government's Clean Power Action Plan. The examination record confirms that East Park Energy's BESS connection remains at Gate 1 only, with National Grid not currently progressing any design work for that connection. There are therefore at minimum two Gate 2 solar connection offers at Eaton Socon, in addition to East Park's Gate 1 BESS position. The Examining Authority has been asked in the accompanying written submission to require the Applicant to confirm the available capacity position at Eaton Socon before the close of examination.

4. The Cumulative Picture

4.1 The annotated map makes visible for the first time, in a single image, the cumulative extent of solar development in this landscape study area. The most striking feature is the direct adjacency of High Wood / Bassmead Manor to East Park Energy's Site D: the two schemes effectively share a boundary, forming a continuous solar footprint across the southern flank of the East Park order limits. Together with the operational Top Farm scheme immediately to the south-west and Cobholden to the south, the total solar infrastructure in this landscape substantially exceeds what any single scheme's LVIA was able to assess in isolation.

4.2 The approximate combined generation capacity of the schemes shown (excluding Clearstone, which is pre-application) is as follows:

East Park Energy (proposed): 400MW

High Wood / Bassmead Manor (approved December 2024): up to 50MW

Top Farm / Little Staughton Airfield (operational): 40MW

Cobholden (permitted January 2025): capacity not confirmed

4.3 The submitted East Park Energy LVIA cumulative assessment concluded that no significant cumulative inter-project effects would arise. That conclusion was reached without the benefit of the High Wood and Cobholden consents, and — as the map demonstrates — without the ability to show the direct physical adjacency of High Wood to East Park's Site D. The professional challenge to that conclusion made by the host authorities' landscape expert (AECOM, Rebecca Condillac) at ISH3 on 9 June 2026, identifying under-representation of significant effects and methodological concerns about the treatment of mitigation planting, applies with additional force when the newly consented schemes and their positions relative to East Park are included in the picture.

4.4 The Examining Authority is asked to ensure that the recommendation report does not rely upon a cumulative landscape and visual impact assessment that was prepared without knowledge of these consented schemes and without the ability to reflect their direct adjacency to the proposed development, and that the Applicant is required to address this material gap in the evidence base before the close of examination on 16 September 2026.

5. Map Attribution and Sources

5.1 The base map used in this annex is the East Park Energy site layout map as submitted to the examination by the Applicant (BSSL Cambsbed 1 Limited). The Applicant's map incorporates Ordnance Survey mapping data under licence: © Crown copyright and database rights [2024] OS [0100031673]. The map is reproduced here for the purpose of this examination submission, in the context of a planning examination conducted under the Planning Act 2008.

5.2 The coloured polygon overlays for High Wood / Bassmead Manor, Top Farm / Little Staughton Airfield, and Cobholden Solar Farm, and the Eaton Socon substation marker, have been added by I. Their positions have been estimated from the relevant planning application documents and from the Ordnance Survey place names visible on the base map itself (notably the field name "High Wood" which appears on the OS base at the High Wood Solar Farm location). These overlays are indicative only and do not represent the precise boundaries of any planning application or consent.

5.3 Planning application references: High Wood Solar Farm — HDC 22/01813/FUL (approved 4 December 2024); Bassmead Manor and Home Wood Solar Farm — BBC 22/01998/MAF (approved 4 December 2024); Cobholden Solar Farm — BBC 24/00858/MAF (permitted 31 January 2025); Top Farm / Little Staughton Airfield Solar Farm — operational, planning conditions being discharged under reference 25/80286/COND.