

**Representation by Christopher Lacey interested party responding to the BSSL
Cambsbed 1 Limited updated document EN010141 5.3 Planning Statement REP6-
110 Section 8 Planning Balance and Conclusions.**

In their assessment of Planning Balance, the applicant has listed benefits that it believes the Secretary of State should consider in 8.3.12 table 3 and in 8.3.50 table 4 the applicant has listed what it believes are adverse effects that the Secretary of State should consider.

Paragraph 4.1.3 of NPS EN1 sets out that in the case of Critical National Priority infrastructure the Secretary of State will start out with the presumption in favour of granting consent. Paragraph 4.1.5 says that the Secretary of State should consider the environmental, social and economic potential positive and adverse impacts at national regional and local levels.

Paragraph 4.1.7 of the NPS EN1 sets out that an applicant should mitigate a particular adverse impact as far as possible however where a residual adverse impact remains, the Secretary of State should weigh those residual adverse effects against the benefits of the proposed development.

Paragraph 4.2.14 sets out that the presumption in favour of granting consent for what NPS EN1 defines as Critical National Priority infrastructure will not apply where the mitigation hierarchy has not been applied properly. For numerous reasons set out in multiple written representations this mitigation hierarchy has not been adequately demonstrated on this project. It should be noted amongst other failings that:

- The duty to carry out a proper site selection process and the methodology used in evaluating alternatives sites was flawed and therefore the opportunity to mitigate and avoid the most substantial adverse impacts at the outset were missing.
- The opportunity to avoid siting the proposal on high-quality farmland sites where the agricultural land content was over 75% in Best and Most Versatile land category was not prioritised
- Inadequate assessment of the potential safety implications were a BESS fire to occur and public safety related hazards such as the resultant contamination risk and not demonstrating adequately how these very high impact risks could be effectively mitigated.
- Failure to demonstrate how the construction traffic impacts including flows of HGVs and project workers cars onto this inadequate rural local network of B roads and country lanes with known accident black spots could be mitigated safely.
- Failure to demonstrate the effective mitigation of glint and glare on multiple receptors.

- Inadequate mitigation and failure to demonstrate how the adverse effects on ecology and biodiversity would be avoided.
- Failure to mitigate flood risk resulting from increased and more rapid run off following particularly heavy rainfall and its potential impact on the flooding of various watercourse including the River Kym, Keysoe Brook and Pertenhall Brook.

The Secretary of State may wish to consider therefore whether the mitigation hierarchy has been properly applied.

The attached table A to my submission sets out an appropriate weighting based on the various submissions of interested parties and after reviewing the applicant's various statements and reports.

This planning balance has been applied to identify both the positive and negative impacts of the proposed EPE scheme.

The hierarchy is weighted as set out in the glossary to NPS EN-1, however not all categories of; limited, moderate, great, significant and substantial have been used for both positive and negative impacts in table A to my submission.

For the reasons stated above I do not believe that the Critical National Priority infrastructure presumption should apply and as such the harm very clearly outweighs the benefits of the proposed EPE scheme. Even if the Secretary of State were to take a differing view of the applicability of the presumption this is an exceptional case where the residual harms militate against the need for infrastructure of this type.

The Secretary of State should therefore refuse consent.

TABLE A - EAST PARK ENERGY -PLANNING BALANCE

Impact Identified	Weight in arriving at Planning Balance as per NPS EN1 Glossary
National need for renewable energy infrastructure	Substantial positive weight-albeit presumption in favour of development is compromised due to the lack of properly applied mitigation hierarchy and rigorous site selection and risks to public safety (traffic increased RTA risk on B645 and B660,BESS possible fire and contamination risks , human health (mental health)and increased runoff creating greater flood risk
GHG emissions	Unclear - A comprehensive Lifetime Carbon Assessment has not been produced. The Applicant claims GHG Emissions savings from EPE however alternative calculations produced by SEPE indicate an argument that the construction, operation, refurbishment and decommissioning of EPE are likely to generate more CO2e than it saves.
Loss of agricultural land	Substantial negative weight-The agricultural land on site is slightly above 75% Best & Most Versatile proportion which makes EPE amongst the highest for UK large scale ground mounted PV solar NSIP proposals.The cumulative impact on UK Food Security has been highlighted in written representations.
Traffic & Transport	Substantial negative weight - The network of local B roads and country lanes are totally unsuitable for the heavy construction traffic that would be required to build this project and the applicant's proposed mitigation strategy is inadequate.
Biodiversity Net Gain	Limited positive weight -Whilst new hedgrows and areas of 'species rich grassland' are proposed these will take time to establish and have to be set against the initial loss of existing hedgrows and natural features which are part of the current wildlife habitats on site
Ecology & Biodiversity	Great negative weight-The applicant has failed to demonstrate sufficient measures to mitigate adequately the damage that would be done to wildlife habitats and in particular to ground nesting birds during the 2-3 year construction phase. Recent evidence from solar developments particularly Llantarnam in Wales has demonstrated that once disturbed by the initial construction phase key species have not returned to previous populations.
Landscape	Substantial negative weight- The EPE proposal would industrialise a currently tranquil North Bedfordshire Wolds landscape of rural undulating clayland countryside with ancient bluebell woods and quiet historic villages.
Visual	Substantial negative weight- The impact on views to and across the whole EPE project area and on multiple residential properties which are in very close proximity to the proposed EPE sites.
PROWs	Great negative weight- Whilst there would be some new permissive footpaths included in the EPE scheme elsewhere the existing PROW network and views from it would become less attractive to local and visitor users due to the industrial landscape resulting from the solar complex.
Flood risk & Drainage	Substantial negative weight - Increased run off and reduced ground permeability would materially increase flood risk during times of very heavy rainfall.
Historic environment	Substantial negative weight - Multiple significant adverse impacts on the siting and views of Scheduled monuments on and near to the 4 sites. This includes the Small Roman town and Roman villa and bathhouse and the links between these Roman features and nationally important Roman road Ermine Street road nearby. Along with the impact on several Grade 1 listed churches and grade 2* and grade 2 listed buildings .

Noise & Vibration	Significant negative weight - Loss of quiet background noise level firstly to an enormous extent with very loud noise level during piling and construction and then to a lower constant level during operational phase and the applicant is not seeking to mitigate to below Lowest Observed Adverse Effect Level.
Glint & Glare	Significant negative weight -Due to impact of glare on sensitive receptors including to road and aircraft users.
Soil health & Fertility	Moderate negative weight -Compaction of soil and leaching of fertility.
Air quality	Moderate negative weight- Arising from air quality effects of any potential BESS fire. The risk of which has not been adequately mitigated.
Economic benefits	Moderate negative weight- Significant disruption to local businesses during 2-3 year construction period. Reduced cereals and agricultural commodity production.
Tourism & Recreation	Great negative weight- Based on the loss of amenity value of local countryside to walkers, ramblers and other visitors, impact on the local road network and the industrialised landscape making the North Bedfordshire Wolds less attractive.
Employment	Limited positive weight -Whilst a small number of local jobs may be created the majority of the specialist overseas construction workers required to build the EPE scheme are likely to be brought in by the overseas firms selected to build the project .
Public safety	Substantial negative weight- The risk of a BESS fire and any resultant contamination knock on are not adequately mitigated. Gas and Oil pipelines in close proximity to site D create a heightened risk. As well as the specific risks related to road safety and the potential for increased road traffic accidents during the construction phase and subsequently in the operational phase to road users and aircraft due to glint and glare which are set out above.
Human Health	Great negative weight- Damage to the mental health of nearby residents and many local village populations in the surrounding area during the construction phase and in long term loss of attractive tranquil countryside for recreation.
Water Quality & Resources	Great negative weight- Risk of contamination from a potential BESS fire. Pressure on water resources in the wider area and region from cumulative major developments including Universal Studios Theme Park and Tempsford new town and Dennybrook housing proposals exacerbated by need to support fire services and washing panels

Security

Limited negative weight- The risk of attracting thieves and criminal activity during the construction phase remains.

Colour Key	Impact
	Substantial positive
	Limited positive
	Unclear
	Substantial negative
	Significant negative
	Great negative
	Moderate negative
	Limited negative