

East Park Energy Solar Project

DCO Application 010141

DEADLINE 8 SUBMISSION BY PHIL WAYLES

My final submission summaries some key material matters that have either:

- Not been covered in the application, or
- Not received a substantive or complete response by the Applicant

These material matters must be considered by the Inspector in preparing his Recommendation Report.

Site Identification and Assessment of Reasonable Alternatives

Despite responses provided by the Applicant during the Examination process, it is evident that they did not identify and consider all reasonable alternatives for the potential sites or Point of Connection, nor did they adopt a rigorous, comprehensive assessment process that is standard practice for NSIP's. The Applicant's approach failed to consider several other significant, material factors applicable to the crucial decision-making process, including:

- Archaeology and Cultural Heritage effects
- Landscape and Visual effects
- Ecology and Nature Conservation effects
- Hydrology and Flood Risk effects
- Traffic and Transport effects

Thus, the assessment was fundamentally flawed and could have resulted in a different outcome for the preferred site if all these factors had been considered based on appropriate details contained in the Environmental Statement (ES) and Transport Assessment.

Additionally, there is no evidence presented to demonstrate the Little Barford substation was considered as a reasonable alternative. The Little Barford substation is much closer to Zone C and the ALC at this location is lower grade land than present in Zone B (the proposed location).

Best and Most Versatile Land

This solar project results in the significant loss of high-quality farmland for at least for 40 years (not including construction and decommissioning). Some land will be lost permanently due to mitigations measures such as the "green lanes", hedgerows, visual screening and habitat connectivity and for the permissive paths.

It is unacceptable that approximately 72% of Best and Most Versatile (BMV) land will be taken out of food production. This percentage area far exceeds Natural England's estimate that 42% of agricultural land in England is BMV. The Applicant has not sought to avoid or minimise the impact on BMV land. The planning balance is a material matter, and due weight must be given to the proposed use of BMV in this rural area. Food security is also a nationally significant concern. Food production is climate dependent and Local farmers have said yields are

reduced by 20-30% this summer. We must try to retain as much BMV agricultural land for food security and these sites should not be used for a solar farm.

No solar farms have completed their operational life and been decommissioned and so it remains unproven if the soil quality of the site will be reinstated to achieve the same BMV land classification following decommissioning of the site in over 40 years' time.

Traffic and Transport Issues

Incomplete Traffic Modelling

It is concerning the Environmental Statement and Transport Assessment have not been updated to consider and model the traffic impact of U turning HGV construction traffic at the A1 Little Paxton Junction and/or A1 Buckden Roundabout to north of the A1/B645 junction and the A1/A428/B1428 Wyboston Roundabout Junction and/or Black Cat Junction to the south. These U turn movements are necessary because construction traffic will only join and leave the B645 off the A1 northbound carriageway. This Applicant has not addressed this material matter during the Examination. The lack of evidence of the related traffic modelling means that highway authority agreements rely on incomplete traffic modelling evidence and impact assessment.

Road Traffic Accidents

Significant road safety issues have been overlooked by the Applicant in the assessment of effects. The Transport Assessment records three fatalities on routes used by construction vehicles but the fatalities at two locations - the B645 / Moor Road junction and A1 / B645 junction - are not included in the assessment of effects. The A1/B645 junction is the main access to the site and will be used by construction traffic in the three phases of works. Construction traffic will pass through the B645 /Moor Road junction during the replacement work. Safety should be the number one consideration for the scheme, and this omission questions the validity of construction traffic management proposals.

Permitted Routes Plan for Construction Traffic

The Applicant has not provided a comprehensive Permitted Routes Plan covering all three works phases. Local residents (and the local authorities) have expressed deep concern that traffic volumes would increase through quiet villages and pass sensitive receptors without necessary controls. The Applicant relies on the Proposed Construction Access Strategy plan, but this does not show which are the permitted access routes in the wider area and those where all construction traffic is not permitted. This is unacceptable. Preparation of a Permitted Routes Plan within the outline Construction Traffic Management Plan is standard practice on NSIP schemes. Additionally, the permitted and restricted routes must be enforced and align with the Design Approach Document which identifies a key requirement at Section 4.2.55 "*Access to the Site avoiding narrow routes through villages of Great Staughton, Little Staughton, Keysoe, Pertenhall and Swineshead*".

Traffic impacts during the Replacement Works

The removal of some sections of the internal access tracks post-construction means that HGV and other construction traffic will travel through Great Staughton and Pertenhall during the replacement works phase. The Applicant's Replacement Works assessment identifies up to 30 additional two-way movements per day through Great Staughton for example, with effects lasting around 12 weeks for each replacement phase or 60 weeks in total over five years. This increases safety risks especially past the highly sensitive location of Great Staughton Primary School and accident risk at the B645 / Moor road junction – sadly the scene of a fatal road accident in recent years. The Applicant's current proposal is unacceptable and would be overcome by not removing these sections of the access tracks after the completion of the construction phase or by reinstating them for the replacement works

Construction Traffic Volumes

The Applicant has acknowledged there are some errors in their estimated construction traffic volumes. Construction traffic movements will be much higher than those stated in the application submissions which questions the validity of the transport assessment and greenhouse gas emissions evaluation. The Applicant needs to update these assessments so results and adverse effects are transparent and established on a more robust, realistic basis.

Site Access SA09

I still have significant concerns about the introduction of the satellite compound and access (reference SA09) at Green End, Little Staughton. This required permanent highways improvements, regular traffic management and will impact on the well-used FP4 where it is coincident with the access track and on the school bus service from Little Staughton. Access to this satellite compound should be routed in internal access tracks to avoid unnecessary disruption and disturbance in the village

Effects on the environment

The project will have a significant adverse effect on some cultural heritage assets in the area, including the setting of the prominent Grade I listed All Saints Church at Little Staughton and the nearby Old Manor House, Cretingsbury Scheduled Monument. The effects on these valuable heritage assets and the impact on views across the valley are deeply concerning. The design should be revised so that the solar panels are not visible from these and other important heritage assets.

Eaton Socon Substation

The timeline for construction of the solar farm is not guaranteed because of the uncertainty for the programme for the planning process, design and construction of the expansion, rebuild or provision of a new substation at Eaton Socon. NGET's Relevant Representation says, "the substation is currently full and will require expansion, rebuild or provisions of a new substation to facilitate future connections (this includes the Project)". However, the Applicant has stated their connection can be made by October 2028. This is highly optimistic in view of NGET's

position. This uncertainty is not acceptable for the local communities who are already experiencing disruption from construction works associated with other solar farms in the area. I note the BESS status is Gate 1 and does not have a guaranteed connection and further increases uncertainty about the scope and timing of the East Park Energy project.