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14<sup>th</sup> January 2026

Dear Sir/Madam

## RELEVANT REPRESENTATION

**Project:** East Park Energy

**Applicant:** BSSL Cambsbed 1 Limited

**Your Ref:** EN010141

### 1.0 Introduction

- 1.1 Following the Planning Inspectorate's decision on 30 October 2025 to accept the application for a Development Consent Order (**DCO**) for the East Park Energy project, Huntingdonshire District Council (**HDC**) requests to be registered as an **Interested Party** at the Examination.
- 1.2 This letter is HDC's Relevant Representation (**RR**) and provides a summary of the main aspects of the proposal with which the Council agrees and/or disagrees together with explanations as appropriate in accordance with published guidance.
- 1.3 It is acknowledged that the development will have a range of impacts, some of which involve technical matters that fall within the responsibility of Cambridgeshire County Council (**CCC**). Furthermore, this scheme crosses the administrative boundary with Bedford Borough Council (**BBC**). For clarity, this response relates to the areas of land within HDC's administrative boundary only and comments only on matters where HDC holds technical expertise or statutory function. HDC intends to defer to other statutory agencies on technical matters where they hold primary responsibility for providing advice such as highway safety, public rights of way, minerals and waste, fire safety, surface water, flooding and drainage. HDC is aware of community and public concerns regarding the potential impacts of the development, some of which may overlap with technical matters within HDC's remit, as well as those addressed by other statutory bodies or falling beyond HDC's scope. Interested parties have been advised to submit comments directly to the Planning Inspectorate.

- 1.4 The three host authorities have engaged in a Memorandum of Understanding (03.06.2024) to enable discussions between the local planning authorities, enable joint discussions with the Applicant, and enable the appointment of External Consultants to act on behalf of the three Host Authorities to assess certain aspects of the Application and make representations to the Examination.

## **2.0 Scope and context of this Relevant Representation**

- 2.1 This representation is made without prejudice to the future views that may be expressed by HDC in its capacity as an interested party in the examination process. The comments are made following an initial review of the extensive DCO application material and identifies the main topics/aspects of the proposal which HDC has an interest in and which HDC are likely to want to discuss further as part of the Examination.
- 2.2 Issues and effects are identified where practicable, although further submission will be made via the Local Impact Report (**LIR**) and Written Representations (**WR**) in due course. HDC will be engaging with the Applicant on a Statement of Common Ground (**SoCG**). HDC understands its role in the examination process is to respond to written questions directed to them and to participate in Hearings as scheduled by the Examining Authority.
- 2.3 The Cabinet of Huntingdonshire District Council formally considered the East Park Energy project in its role as a statutory consultee and host authority at its meeting held on 10th September 2024. The Cabinet delegated authority to the Chief Planning Officer, in consultation with the Leader and Executive Councillor for Planning to take all associated action necessary in the interests of the efficient and timely conduct of the Council's compliance with the above DCO.

## **3.0 Planning Policies and Local Context**

- 3.1 Whilst not determinative under the Planning Act 2008, the Examining Authority can consider other important and relevant matters, including national and local planning policy. The local policies that HDC considers of relevance to this application are highlighted below and should be considered as important and relevant to the determination of the application.
- 3.2 In Huntingdonshire the Development Plan (relevant to this project) consists of:
- Huntingdonshire's Local Plan to 2036 (2019)
  - Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)
  - Great Staughton Neighbourhood Plan (2021 to 2036)
- 3.3 Supplementary Planning Documents (SPDs) and other guidance relevant to the project:
- Landscape and Townscape SPD (2022)
  - Cambridgeshire Flood and Water SPD (2017)
  - Developer Contributions SPD (2011) (costs updated annually)
  - Huntingdonshire Strategic Flood Risk Assessment (2025)
- 3.4 The Great Staughton Neighbourhood Plan (2021 to 2036) was made on 15 October 2025 and now forms part of the statutory Development Plan. It sets out locally specific policies on housing, design, and environmental protection, which must be considered

in determining development proposals within the neighbourhood plan area. The relevant Neighbourhood Plan policies are:

- GSNP 7 – Landscape and Townscape Characteristics
- GSNP 9 – Great Staughton Conservation Areas
- GSNP10 – Non Designated Heritage Assets
- GSNP 11 – Biodiversity and Wildlife Habitats
- GSNP 13 – Community-Led Renewable Energy Projects
- GSNP 15 – Surface Water Flood Risk
- GSNP 17 – Road Safety and Parking

3.5 **Huntingdonshire's Local Plan to 2036** sets out the long-term vision and planning policies for development across the district, including housing, employment, infrastructure and environmental considerations. It was formally adopted by Huntingdonshire District Council on 15 May 2019. The key Local Plan policies relevant to this project are:

*LP 2: Strategy for Development*

The development strategy for Huntingdonshire is set out in Policy LP 2 of the Local Plan. This seeks to, amongst other things, recognise the intrinsic character and beauty of the countryside, conserve and enhance the historic environment; and provide complementary green infrastructure enhancement and provision to balance recreational and biodiversity needs and to support climate change adaptation.

*LP 10: The Countryside*

The application site is deemed to be open countryside for planning purposes. Policy LP 10 of the Local Plan sets out that development in the countryside will be restricted to the limited and specific opportunities as provided for in other policies of this plan.

All development in the countryside must:

- a. seek to use land of lower agricultural value in preference to land of higher agricultural value:
  - i. avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible, and
  - ii. avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land;
- b. recognise the intrinsic character and beauty of the countryside; and
- c. not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.

*LP 35: Renewable and Low Carbon Energy*

Policy LP 35 states that a proposal for a renewable or low carbon energy generating scheme, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable. When identifying and considering the acceptability of potential adverse planning impacts their significance and level of harm will be weighed against the public benefits of the proposal. Special regard must be given to protecting heritage assets and their settings, and landscape and visual impacts should be assessed in line with the Huntingdonshire Landscape and Townscape SPD (2022). All reasonable efforts to avoid, minimise and, where appropriate, compensate will be essential for significant adverse impacts to be considered fully addressed.

- 3.6 Further relevant Local Plan policies include:
- LP 5: Flood Risk
  - LP 11: Design Context
  - LP 12: Design Implementation
  - LP 14: Amenity
  - LP 15: Surface Water
  - LP 16: Sustainable Travel
  - LP 17: Parking Provision and Vehicle Movement
  - LP 30: Biodiversity
  - LP 31: Trees, Woodland, Hedges and Hedgerows
  - LP 34: Heritage Assets and their Settings
  - LP 36: Air Quality
  - LP 37: Ground Contamination and Groundwater Pollution
- 3.7 The planning policies listed are broadly consistent with those identified by the Applicant in the Policy Compliance Document **[APP-032]**.

#### **4.0 Emerging Local Plan**

- 4.1 In October 2025, the Council issued its Preferred Options consultation on the emerging Local Plan. Paragraph 49 of the National Planning Policy Framework sets out that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework.
- 4.2 At the time of writing, the emerging Local Plan remains at an early stage, meaning that little, if any, weight can currently be attributed to the Preferred Options document. This position may evolve as responses to the consultation are received, collated, and published. Later stages in the DCO process may mean that greater weight is given to emerging policies.

#### **5.0 Key Considerations**

- 5.1 It should be noted that this representation only comments on issues and impacts where HDC has a statutory function or holds technical expertise relevant to the assessment of the project. The relevant issues which HDC expects to be scrutinised in detail through the examination phase are:
- Compliance with relevant legislation
  - Policy compliance including EN-1, EN-3 and EN-5 and development plan policies
  - Agricultural Land/Land and Soils
  - Landscape and Visual Impact
  - Ecology and Biodiversity Impacts, including Biodiversity Net Gain
  - Heritage Impacts
  - Amenity, including impacts from noise and vibration, air quality and contamination
  - Socio-economics, land-use, and tourism
  - Climate change
- 5.2 HDC provides initial comment in relation to the following important and relevant considerations. Further submission will be made via the LIR and WR in due course. This

response has been set out using the same headings as the Applicant's Environmental Statement September 2025 where appropriate.

## **6.0 Principle of development**

- 6.1 HDC has formally recognised that there is a climate crisis and ecological emergency in Huntingdonshire and [HDC's Climate Strategy and Action Plan \(2023\)](#) adopted the aspiration of a net carbon zero Council by 2040 and seeks to strongly influence district-wide action on emissions and biodiversity. Furthermore, [Huntingdonshire Futures Place Strategy](#) emphasises the importance of climate action.
- 6.2 The Council accepts that there is a compelling need, as a matter of principle, to increase renewable energy generation and consumption to support the Government's national agenda to reach net zero carbon by 2050.
- 6.3 The application site is located outside a built-up area and is therefore considered to be within the countryside for planning purposes. In such a location development is restricted under Local Plan Policy LP 10 to those that are provided for in other policies within the Local Plan. The supporting text to that policy notes that this is in order to balance support for a thriving rural economy and land-based business, while protecting the character and beauty of the countryside.
- 6.4 Local Plan Policy LP 10 states that all development in the countryside must seek to use land of lower agricultural value in preference to land of higher agricultural value, avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible and avoiding Grade 1 land unless there are exceptional circumstances. Initial comments on the Applicant's Land and Soil chapter of the ES **[APP-049]** are set out in Section 14 of this representation. HDC intends to provide further commentary on the amount of agricultural and BMV land that would be impacted and a detailed assessment of the Scheme against Policy LP 10 within the LIR and WR.
- 6.5 Policy LP 35 is of particular relevance which states "a proposal for a renewable or low carbon energy generating scheme, other than wind energy, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable". As set out in paragraph 8.52 of the Local Plan, these impacts will include, but are not limited to:
- any on the surrounding environment
  - amenity, and in particular impacts from noise and air quality
  - heritage assets and/ or their settings
  - biodiversity
  - landscape
- 6.6 The potential for cumulative impacts will need to be considered and addressed.
- 6.7 As stated above, Policy LP 35 provides support in principle for renewable and low carbon energy generation projects and is therefore considered be one of the specific opportunities for development in the countryside supported in the local plan, subject to a detailed assessment of the proposal, its impacts and appropriate mitigation of any significant adverse impacts.

- 6.8 The acceptability of the proposal is fundamentally dependent on the impacts arising from the development. The scheme represents a solar installation of significant scale in a rural context. While the project would make a significant positive contribution toward reducing carbon emissions over its operational lifespan, it is inevitable that adverse effects will occur and these impacts must be carefully assessed and balanced against the benefits.

## **7.0 Landscape and Visual Impact**

- 7.1 It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities, and as subsequently notified to the Applicant who confirmed agreement, to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters. As assessment of this aspect and related matters may vary in terms of the Host Authority's planning policy, the assessment is set out against the three Host Authorities as set out below.

- 7.2 This content is duplicated in Bedford Borough Council's RR but is included in Huntingdonshire District Council's RR for completeness.

### *Overview*

- 7.3 Landscape and Landscape Visual Impact Assessment matters are considered within Chapter 5 of the Environmental Statement (ES) **[APP-041]** and supporting figures and appendices. The development has the potential to transform the local landscape by altering the character and by virtue of the scale of the proposals, there will be significant residual landscape character and visual impacts that cannot be mitigated. Effects will primarily be derived from the introduction of construction (albeit temporary and reversible) and solar PV panels over a large area, rather than by modification of landform, field patterns or loss of characteristic elements such as hedgerows or woodland, which will be retained. The main landscape receptors are Bedford LCA 1B: Riseley Clay and Farmland and Huntingdonshire LCA: Southern Wolds. Significant effects are assessed in construction and operation Year 1 for LCA 1B: Riseley Clay and Farmland and for Huntingdonshire LCA: Southern Wolds in construction but not operation. No significant landscape effects are assessed for Year 10 or beyond.
- 7.4 All Landscape and Landscape Visual Impact Assessment matters raised by the Planning Inspectorate in its Scoping Opinion have been addressed in the ES. However, the completeness of the responses is discussed in this representation.
- 7.5 The development has been identified in the LVIA as resulting in a significant change to a variety of visual receptors, with significant residual visual effects identified for residential locations at Year 1 (reducing to non-significant by Year 10) and from PROW in the immediate vicinity of the solar panels and more distant open and elevated views from higher land (some remaining significant at Year 10). There will be sequential changes in views and adverse visual impact for users of PROWs. This includes the different users of the network, such as equestrians and cyclists as well as walkers. No significant visual effects have been identified on residential receptors located directly within the villages located within the study area.
- 7.6 A Residential Visual Amenity Assessment (RVAA) for the Scheme has been produced and considers the construction, operational and decommissioning stages of the Scheme. The RVAA concludes that the Scheme would not result in an overbearing effect

on residential visual amenity. Effects would remain below the Residential Visual Amenity Threshold during construction, operation, and decommissioning, and no dwelling would experience a reduction in outlook or visual amenity, sufficient to make it an unattractive place to live.

- 7.7 The Scheme would be introduced into the same LCA as the majority of the High Wood Solar Farm and would result in cumulative change in landscape character in this part of the Southern Wolds LCA, which is already influenced by a solar farm south of the Scheme, (and which largely would be surrounded by the proposed High Wood Solar Farm) and Staughton Airfield Solar Farm, which is located 1.4km south-west of the Scheme at its closest point.

*Bedford Borough Council*

- 7.8 For Bedford LCA 1B: Riseley Clay and Farmland effects at Y10 are assessed as minor and nonsignificant. Given the primary source of landscape change is the introduction of the PV panels, the effect of mitigation by Year 10 is overstated and although the scheme may be better integrated/mitigated it is still a large area of increased industrialisation in the long term, which constitutes a significant effect on LCA1B. At Year 10 the ES LVIA indicates there will be a Moderate Adverse level of effect on the landscape character of LCA 1B, under the LVIA methodology this could be significant or non-significant, the former being more appropriate.

- 7.9 Effects on visual receptors are broadly accepted as appropriate, noting that there is a heavy reliance on the mitigation to screen the solar panels but any effects of obstructed or truncated views are not referenced and will adversely change the experience of users of PRoW. Similar to the comments for landscape character, it is noted that wherever there is a moderate effect on visual amenity this is taken to be non-significant, noting the methodology indicates it could and in some cases should be a significant effect.

- 7.10 The overall conclusion is that there is some slight under-representation of significant effects.

*Cambridgeshire County Council and Huntingdonshire District Council*

- 7.11 The non-significant effect on Huntingdonshire LCA: Southern Wolds in operation is contrary to what might be expected given the PV panels would occupy a central and high percentage of the LCA, at least in relation to the extent of the LCA south of Grafham Water. Some justification is provided in that there are industrialising influences present in the LCA, however this seems to be given too much weight, along with mitigation, in what is, as described in the LVIA, a rural landscape.

- 7.12 Comments regarding visual amenity as per BCC para 7.8 above.

- 7.13 The overall conclusion is that there is an under-representation of significant effects.

*Glint and Glare Study*

- 7.14 It is accepted that based on The Glint and Glare study extract in paras. 5.8.73 to 5.8.76 of the ES LVIA that due to the existing screening and / or proposed screening in the landscape, glint and glare impacts would be acceptable unless revised, new or additional information is received.

*The mitigation proposals*

- 7.15 ES Vol 3 Figure 2-1: Illustrative Environmental Masterplan **[APP-121]** shows the proposed landscape and visual mitigation for the Scheme.
- 7.16 The landscape proposals are tailored to the location and required functions of each part of the Scheme, noting that these change across the DCO site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where possible, especially for visual receptors, at the edges of settlements, and along routes connecting settlements.
- 7.17 Most importantly, as set out in Design Principle 7: The Scheme as drawn on the landscape Illustrative Environmental Masterplan will leave a positive legacy through the delivery of strengthening and supplementing the landscape character within the Order Limits post operation. The means of securing these benefits are as yet unclear.

## **8.0 Arboriculture**

- 8.1 The following comments are provided by HDC's Arboricultural Officer following a review of ES Vol 2 Appendix 2-2: Arboricultural Assessment **[APP-056]**.
- 8.2 The Arboricultural Impact Assessment is considered robust and identifies numerous valuable trees, including veterans, across the landscape. The anticipated impact on these trees is assessed as minimal.
- 8.3 A small number of trees are in direct conflict with the proposals; therefore, equipment should be located outside the falling distance of trees to avoid future pressure for removal and to mitigate shading effects from canopies.
- 8.4 No objection is raised at this stage; however HDC reserves the right to comment on the draft DCO requirements in relation to arboricultural matters in its WR and LIR.

## **9.0 Cultural Heritage and Archaeology**

- 9.1 *Archaeology:* Comments are deferred to the Historic Environment Team at Cambridgeshire County Council (CCC).
- 9.2 *Above-ground Heritage Assets:* The following comments are provided in respect of Environmental Statement Vol 2 Appendix 6-4: Settings Impact Assessment **[APP-083]**.
- 9.3 With the exception of Warren House (discussed below), the submitted documents relating to the potential impacts of the proposed solar farm on the setting of Heritage Assets within Huntingdonshire accord with initial assessments.
- 9.4 Discovery of the Romano-British small town south of Great Staughton has helped mitigate the likely visual impact of the solar farm on the conservation area and associated heritage assets by creating a buffer of open space between the built form and the solar arrays. In particular, it will help maintain the setting of the medieval ridge and furrow located between The Highway and The Town.
- 9.5 The proposed belts of planting will also help screen those arrays closest to the village but there will still be some visual impact in views where the topography elevates the



arrays over the proposed screening and existing vegetation. Taken as a whole, the impact of the solar farm on the significance of Great Staughton heritage assets is likely to be less than substantial.

- 9.6 The additional assessments of Kimbolton Conservation Area and its associated heritage assets confirm the ZTV illustration showing limited intervisibility between the solar arrays and the built form. This is primarily because Kimbolton sits at a lower elevation within the landscape. The impact of the solar farm on these heritage assets is therefore likely to be minor. As described below, the impact of the solar farm on the significance of Warren House remains unclear and further work is required.
- 9.7 With reference to Asset No.984 – Warren House – Grade II\* listed building, at page 40 the Plates / LVIA viewpoints references are incorrectly labelled as ES Volume 1; the Viewpoints are in ES Volume 3. The Viewpoints in Environmental Statement Volume 3 – Figures; Chapter 5 Figures – Landscape and Visual are not labelled with a determining suffix contrary to the references given in ES Vol 2, Appendix 6-4: Settings Impact Assessment **[APP-083]**.
- 9.8 The assessment incorrectly identifies Warren House as being built as a ‘vista building’. Research indicates that it was initially built as a warrener’s lodge, other examples of which were constructed to offer views across the estate rather than simply to feature within views from the house and its grounds. The buildings significance therefore also derives from its association with the wider views of the estate within the Kym valley that are afforded by its elevated outlook.
- 9.9 The impact of the solar farm on views from Warren House are therefore relevant and should be included in an additional viewpoint from the building. The current assessment based on views from the opposite side of the valley is inadequate to identify the level of harm to the significance of this highly graded heritage asset. HDC considers it essential that this matter is addressed to ensure a robust assessment of heritage impacts. We therefore invite the applicant to engage with the LPA at the earliest opportunity to agree an appropriate additional viewpoint from Warren House.

## **10.0 Ecology and Nature Conservation**

- 10.1 It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities, and as subsequently notified to the Applicant who confirmed agreement, to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters.
- 10.2 The ecology and nature conservation concerns raised are consistent across the three Host Authorities and therefore are not in this case separated out for each of the three Host Authorities.
- 10.3 This content is duplicated in Bedford Borough Council’s RR but is included in Huntingdonshire District Council’s RR for completeness.
- 10.4 6.1 Environmental Statement - Vol 1 Chapter 7 Ecology and Nature Conservation P01 [APP-043] and accompanying appendices **[APP-091 to APP-097]** provide details of a broad suite of ecological surveys and investigations undertaken by the Applicant to inform the Environmental Statement. These are supported by 6.3 Environmental

Statement - Vol 3 Chapter 7 Ecology and Nature Conservation Figures P01 **[APP-145]** and; 6.3 Environmental Statement - Vol 3 Chapter 7 Ecology and Nature Conservation Figures P01 – Confidential **[APP-146]** which provides accompanying figures.

10.5 The following documents are also of relevance providing further information on the avoidance, mitigation and compensation measures that form part of the project: 6.3 Environmental Statement - Vol 3 Figure 2-1 Illustrative Environmental Masterplan P01 **[APP-121]**; 7.2 Commitments Register P01 **[APP-154]**; 7.3 Outline Construction Environmental Management Plan P01 **[APP-155]**; 7.5 Outline Environmental Management Plan P01 **[APP-157]**; 7.6 Outline Decommissioning Environmental Management Plan P01 **[APP-158]**; 7.7 Outline Landscape and Ecological Management Plan P01 **[APP-159]**; and 7.17 Biodiversity Net Gain Report P01 **[APP-168]**.

10.6 All Ecology matters raised by the Planning Inspectorate in its Scoping Opinion have been addressed in the ES. However, the completeness of the responses is discussed in this representation.

*Designated Sites*

10.7 The additional information that has been incorporated into the assessment since statutory consultation is welcomed, including 2025 bird survey data and additional rationale for the scoping out of Grafham Water SSSI. Based on the updated information the Host Authorities are content that the Scheme is unlikely to result in significant effects on statutory designated sites of nature conservation importance.

10.8 The Scheme will involve works adjacent to two non-statutory sites, Huntingdon Wood County Wildlife Site (CWS) (designated for its ancient woodland, an irreplaceable resource), and Kangaroo Meadows CWS (designated for neutral grassland communities). While no direct loss of habitat within these sites is expected, the Host Authorities are concerned that there is currently insufficient information to verify the applicant's conclusion that these sites will not be adversely impacted during construction. Further information is required to assess the potential for hydrological impacts through trenching in close proximity to Huntingdon Wood CWS, potential impacts of construction lighting, and potential impacts of the use of an existing culvert for construction access. At Kangaroo Meadows CWS clarification is required on the potential for adverse effects on existing grassland through shading by proposed mitigation woodland planting once mature.

10.9 The Host Authorities welcome that the design and assessment have evolved to take account of previous consultation feedback on ecological issues. However, we remain concerned that the assessment for certain species groups is based on incomplete survey information (e.g. spot check surveys only for water vole/otter and some areas inaccessible for bird and newt survey). It is not always clear within the assessment how these shortfalls in data have been considered and their impact on the final assessment conclusions.

10.10 The Host Authorities are concerned that without suitable mitigation and compensation provision the Scheme has potential to result in a significant adverse effect on ground nesting birds, in particular skylarks (125 territories recorded within the Site). The ES **[APP-043]** sets out at paragraph 7.8.112 the intention to create large areas of open grassland 'to be of benefit for skylark and lapwing and to encourage nesting attempts within these areas'. The oLEMP **[APP-159]** currently provides insufficient detail to

demonstrate that the proposed measures will be sufficient. It is recommended that a detailed farmland birds mitigation strategy (covering both breeding and non-breeding birds) is produced to include (but not be limited to):

- details of proposed habitat losses and gains (overall area and territory numbers);
- measures to be employed to protect ground nesting birds during construction and operational phases;
- consideration of the phasing of both impacts and proposed mitigation/compensation provision; and
- how the proposed management regime will ensure that habitats are managed in a suitable manner to ensure they remain suitable for use by skylark and other ground nesting birds.

10.11 These details are required to assess the appropriateness of the measures proposed and determine if further off-site compensation is required.

10.12 The Host Authorities are concerned that trees within and adjacent to the Site have not been surveyed to identify their potential to support roosting bats. The applicant has stated at paragraph 7.7.20 of the ES **[APP-043]** that ‘trees present within the Site would be retained and protected during construction’, however we consider that as a minimum the location of PRF-I and PRF-M trees should be established in order that it can be demonstrated within the CEMP or oLEMP that suitable protection buffers can be incorporated into the design for all relevant trees. The minimum 6m hedgerow buffer outlined in the ES would be insufficient to prevent disturbance where roosts are confirmed or have the potential to be present.

10.13 The Host Authorities note that while the presence of hazel dormouse is unlikely, in the absence of survey it is not possible to fully rule out its presence. The small scale of potential hedgerow impacts is acknowledged; however further detail should be provided on how any residual risks of impacts on hazel dormouse will be avoided (e.g. through the application of a precautionary method of works incorporating sensitive timing and working methods).

10.14 A single combined survey visit for water vole and otter has been undertaken for each proposed watercourse crossing point during June 2025. This survey appears to have consisted of spot checks of crossing point location rather a more comprehensive survey of suitable habitat within/adjoining the Site. The Host Authorities are concerned that for water vole in particular the presence of dense vegetation may have obscured field signs leading to under recording, and due to the restricted survey undertaken areas identified for ‘enhancement’ have not been subject to baseline surveys. The Host Authorities are content that the proposed pre-construction checks detailed in Section 5 of the oLEMP **[APP-159]** alongside the commitment to positive management of retained ditches provided in paragraphs 6.4.8 to 6.4.13 of the oLEMP are likely sufficient to demonstrate potential impacts can be mitigated if they are found to be present. However, further clarification is required on enhancement proposals including proposals for baseline surveys of areas identified for enhancement to check their existing water vole status.

10.15 It is noted that 2025 surveys have confirmed the presence of great crested newt within the Site at waterbody references P14 and P25. The great crested newt survey report **[APP-095]** identifies P46 as adjacent to the Site but does not include details of this waterbody. Confirmation is required what (if any) survey has been undertaken at P46.

The ES acknowledges that a Natural England licence will be required to cover the proposed works, however currently no letter of impediment has been obtained from Natural England.

*Avoidance/Mitigation/Compensation*

- 10.16 The Host Authorities welcome the proposed biodiversity mitigation / compensation set out in the ecology chapter **[APP-043]**, however, some have not been adequately incorporated into other submission documents (e.g. environmental masterplan, engineering drawing and management plans) and therefore, delivery cannot be assumed. For example, references to incorporation of sensitive lighting design need to be better reflected in the content of the oLEMP and CEMP to ensure adverse effects on adjoining habitats such as Huntingdon Wood CWS and ancient woodland are avoided.
- 10.17 The proposed woodland planting and that plants of local provenance are to be utilized is welcomed. The proposed woodland planting stock list should be further discussed with local authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease).
- 10.18 It is the Host Authorities' understanding that the powers requested under the DCO will not seek to remove any of the habitats created or established at the Site. However, following decommissioning (i.e. the removal of the physical infrastructure) all habitats would be returned to landowners, and at this point habitats could potentially be removed subject to the relevant legislative and policy requirements at the time being adhered to. The Council seeks agreement from the applicant that areas of species-diverse grassland to be created under the Scheme will be retained and their long-term management secured to ensure the beneficial effects identified in the ES are permanent.
- 10.19 The Host Authorities welcome the inclusion of the expected biodiversity net gain metric outputs as commitment C12 of the Commitments Register **[APP-154]**. However, are concerned that these commitments are not currently reflected in the oLEMP, and currently the calculation undertaken is high level only. We request commitments are clearly stated in the oLEMP to ensure clarity on targets post construction. We also note that the final biodiversity net gain outcomes will be dependent on created habitats being maintained and suitably managed. Given the temporary nature of the development, and that the ongoing management of created habitats after demobilisation are not currently secured, we consider the current BNG calculation outputs (and linked beneficial effects) may therefore overstate the likely final scheme outcome.
- 10.20 The Host Authorities note that the minimum 6m buffer between the fenceline of the solar farm and the surround hedgerows specified in Section 3.4 of the oLEMP is low, in particular for hedgerows containing standard trees. We request that these minimum buffers are extended, and greater consideration is given to varying the overall extent of panels at the margins of the site to provide larger buffer zones that will enhance their value for a range of species.
- 10.21 The Host Authorities have concerns regarding the method identified for establishment of species diverse grassland in the areas identified within the illustrative Environmental Masterplan **[APP-121]** and the oLEMP **[APP-159]**. These areas are largely currently in

arable use and therefore likely to have high nutrient levels. Current proposals do not initially incorporate methods to reduce soil fertility (e.g. soil inversion) or promote diversity (e.g. sowing of yellow rattle). If there is a need to rely on frequent early cutting of the sward to reduce nutrient levels, this may be in conflict with the proposed use of the same areas to provide habitat for ground nesting birds.

- 10.22 The embedded mitigation measures for veteran trees and trees with veteran features outlines in the oCEMP **[APP-155]** are welcomed. We request that for consistency, reference to these measures is also included within the oLEMP **[APP-159]**.

*Monitoring*

- 10.23 The frequency of monitoring set out within Section 8.0 of the OLEMP is welcomed, but we note that the existing monitoring proposals appear largely aimed at assessing progress towards the Biodiversity Net Gain (BNG) targets. Given that the Site is utilised by a range of protected and/or notable species, including a significant ground nesting bird population, a more holistic monitoring strategy including bird surveys is necessary. This should include the consideration of species and wider ecosystem characteristics. Adherence to the standard approach to monitoring biodiversity promoted in Solar Energy UK guidance is strongly recommended.

*Biodiversity Net Gain Assessment*

- 10.24 Biodiversity Net Gain (BNG) has been considered by the Applicant as part of the Environmental Statement, building on matters raised during earlier pre-application and PEIR consultation stages. The submission of a standalone BNG Report **[APP-168]** represents a progression from previous material and provides a clearer basis on which the Scheme's proposed biodiversity outcomes can be examined.
- 10.25 The BNG assessment has been undertaken using the Statutory Biodiversity Metric and is informed by an illustrative design and outline management proposals. As such, the reported biodiversity gains represent a high-level assessment and are subject to refinement as the Scheme design is progressed. In recognition of this, the Applicant has set specific project commitments that are lower than the headline gains indicated by the illustrative metric outputs. However, the extent to which measures proposed to mitigate significant effects are clearly distinguished from those intended to deliver BNG remains a matter for further examination.
- 10.26 All BNG matters raised by the Planning Inspectorate in its Scoping Opinion are considered to have been addressed in the ES with the exception of the following with the Host Authorities comments on this provided in this representation:
- Clear differentiation between measures proposed to mitigate significant effects and measures proposed to support BNG.
- 10.27 The Applicant is not currently subject to a mandatory requirement to deliver 10% BNG, as statutory BNG does not yet apply to Development Consent Order schemes. However, it is acknowledged that mandatory BNG for NSIPs is anticipated from May 2026 and that national policy and industry practice are increasingly moving towards the delivery of measurable biodiversity enhancements in advance of statutory requirements.

- 10.28 The Applicant does note Bedford Borough Council's requirement within its Local Plan 2030 to achieve a net increase in biodiversity and the Draft 2040 Local Plan, Policy DM 7 to secure a minimum of 10% BNG.
- 10.29 The Applicant has committed to delivering 70% net gain in area-based habitat units, 30% net gain in hedgerow units, and 5% net gain in watercourse units, as set out within the submitted BNG Report. These commitments provide transparency regarding the level of biodiversity enhancement proposed; however, it is noted that the figures are derived from high-level calculations based on outline design assumptions and do not, at this stage, represent secured or fully defined outcomes. It is noted that the current commitment made in BNG Report **[APP-168]** does not detail that this commitment will be secured onsite. The presumption based on the BNG report is that it will be possible to achieve this level of commitment onsite, however confirmation should be sought.
- 10.30 The Host Authorities note that expectations in relation to BNG vary across the administrative areas affected by the Scheme. In particular, Cambridgeshire County Council has articulated aspirations for higher levels of BNG through strategic policy and consultation responses, reflecting wider regional ambitions for nature recovery, while Bedford Borough Council and Huntingdonshire District Council similarly seek measurable net gains for biodiversity through local plan policy. The Examination will provide the appropriate forum to consider how the Applicant's proposed BNG commitments align with these differing local expectations and emerging national guidance.
- 10.31 With regard to methodology, the BNG Report describes the use of UK Habitat Classification and the Statutory Biodiversity Metric condition criteria to inform baseline assessments. While this approach is appropriate in principle, further clarity would be beneficial on how baseline condition judgements have been applied consistently across extensive habitat areas, particularly where professional judgement has been relied upon. At this stage, no detailed habitat condition information has been provided.
- 10.32 The Host Authorities support the Applicant's robust and transparent application of the biodiversity trading rules, which is considered appropriate at this stage.
- 10.33 The Scheme comprises a large-scale ground-mounted solar photovoltaic development, and further clarification would be beneficial on how under-panel habitats are classified, managed and condition-scored within the BNG assessment over the operational lifetime of the Scheme, and the extent to which these areas contribute to the reported biodiversity gains.
- 10.34 The Host Authorities note that delivery of the proposed BNG outcomes is reliant on outline management measures, with limited detail currently provided on how habitats will be secured, managed and monitored over the lifetime of the Scheme. While it is indicated that further detail will be secured through a Requirement attached to the draft DCO, additional clarity will be required through the Examination process to ensure that the proposed BNG commitments are capable of being delivered and maintained in practice.
- 10.35 In addition, limited detail is provided regarding how habitats of biodiversity value established during the operational phase would be treated at decommissioning. Given

the proposed operational lifetime of up to 40 years, further clarification will be required to ensure that biodiversity gains are not inadvertently lost at that stage.

- 10.36 Overall, the submitted BNG approach is considered to provide a suitable basis for Examination, subject to the matters identified above being addressed through the Examination process.

## **11.0 Flood Risk, Drainage and Surface Water**

- 11.1 The following comments are made with reference to the applicant's ES Vol 1 Chapter 8: Hydrology and Flood Risk **[APP-044]** and the supporting documentation.
- 11.2 It is noted that small areas of the site within the Order Limits are located within Flood Zones 2 and 3, however all critical infrastructure (excluding watercourse crossings) have been sequentially located in areas at the lowest possible risk of fluvial flooding (Flood Zone 1). Where solar arrays are to be located within areas at risk of flooding, it is proposed to install these such that the underside of the panels would be above the maximum predicted flood levels, with only supporting legs of the mounting tables within the flood extent. Comments on the acceptability of this approach, and the proposed watercourse crossings are deferred to the Environment Agency.
- 11.3 In terms of surface water flooding and drainage, comments are deferred to the Local Lead Flood Authority (Cambridgeshire County Council).
- 11.4 It is also noted that the Sequential and Exception Tests have been carried out by the applicant for the Examining Authority to consider in determining whether the proposed development satisfies national policy requirements.
- 11.5 HDC reserves the right to provide further comments on these matters within the LIR.

## **12.0 Amenity (in particular impacts from noise, vibration and air quality)**

- 12.1 The following comments include input from HDC's Environmental Health Officer and references specific chapters of the Applicant's Environmental Statement **[EN010141/DR/6.1]**.

### *Noise and Vibration (Chapter 10) [APP-046]:*

- 12.2 Following a detailed review, the methodology and baseline data are considered acceptable, and proposed limits set out are agreed. The following management plans have been reviewed and should be secured as requirements of the DCO:
- Outline Construction Environmental Management Plan **[APP-155]**
  - Outline Operational Environmental Management Plan **[APP-157]**
  - Outline Decommissioning Environmental Management Plan **[APP-APP-158]**

### *Air Quality (Chapter 11) [APP-047]:*

- 12.3 The assessment is considered acceptable and agreed. Dust would be controlled through the outline Construction Environmental Management Plan **[APP-155]** and the associated Dust Management Plan. In a worst-case scenario, construction dust could pose a medium risk of adverse impacts if unmitigated; however, the proposed mitigation measures would reduce this risk to negligible. Regarding air pollutants such as nitrogen dioxide, it is agreed that potential effects on human health from

construction vehicle emissions are not significant. The Considerate Contractor Scheme would be implemented, and it is agreed that its overall significance in relation to air quality effects is not significant.

*Other Environmental Topics (Chapter 16) [APP-052]:*

- 12.4 The assessment is considered acceptable and agreed in respect of waste. The outline Waste Management Plan **[APP-164]** has been reviewed and should be secured as requirement of the DCO. Further comments on waste are deferred to CCC as the Minerals and Waste Planning Authority.

**13.0 Ground Conditions**

- 13.1 The following comments include input from HDC's Environmental Health Officer and are made with reference to Chapter 12 of the Applicant's Environmental Statement **[APP-048]**.
- 13.2 It is agreed that intrusive ground investigations would only be required where ground disturbance is proposed. Particular attention should be given to the locations of former buildings, infilled ponds and the former oil pipeline. The CEMP should set out the necessary procedures. The outline Soil Management Plan **[APP-161]** has been reviewed and should be secured as a requirement of the DCO.

**14.0 Land and Soils**

- 14.1 It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities, and as subsequently notified to the Applicant who confirmed agreement, to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters.
- 14.2 The Land and Soils matters raised are consistent across the three Host Authorities and therefore are not in this case separated out for each of the three Host Authorities.
- 14.3 This content is duplicated in Bedford Borough Council's RR but is included in Huntingdonshire District Council's RR for completeness.
- 14.4 Land and Soils has been considered by the Applicant in Environmental Statement – Vol 1 Chapter 13 Land and Soils. [APP-049] with supporting appendices which are:
- ES Volume 2 Appendix 13-1: Agricultural Land Classification and Soil Resources **[APP-015]**
- 14.5 All Land and Soils matters raised by the Planning Inspectorate in its Scoping Opinion have been addressed in the ES. However, the completeness of the responses is discussed in this representation.
- 14.6 Responses to Natural England's scoping opinion had outlined how continuation of data collection would be conducted. A subsequent change to the approach adopts a less intensive method than was originally proposed, which for the most part equated to one survey point per 2 ha. However, where impacts were anticipated to be greater (BESS, on-site sub-station and compounds and cable corridors) the standard methodology of 1 sample per hectare was adopted. It is indicated that the revised methodology followed further discussion with Natural England.



- 14.7 It is not apparent whether the discussions with Natural England extended to the absence of data for an area of land (ungraded) amounting to 5.4 % of the site. Access to this land was not available. The response to the absence of data, for the purpose of the EIA, is to assume a worst-case outcome by assuming the land to be Grade 2. Whilst this enables assessment of project worst-case project effects, the absence of data hinders development of a detailed soil management plan (proposed post consent and to be substantially in accordance with the outline soil management plan). The missing data should also be available for restoration of land, upon decommissioning, to its original condition.
- 14.8 Discussion recognising that mineral resources would not be sterilised by the scheme is adequately developed and that conclusion is supported.
- 14.9 A permanent change of land use in the form of landscaping and habitats, referenced as substantially in accordance with the illustrative outline landscape and ecological management plan, includes approximately 19 ha of native species woodland and 17.4 km of native hedgerows. Table 13.12 acknowledges that the creation of the habitats, which should be considered permanent in respect of areas of woody vegetation, will have adverse impacts from the loss of biomass production (from agricultural land) but potential benefits to soil resources. These permanent effects are not addressed in the presentation of residual effects, including an absence from the summary Table 13.5. The conclusion that the scheme would result in a permanent adverse impact to approximately 5.86 ha does not incorporate the effects of habitat creation.
- 14.10 Assessment of residual effects is summarised by receptor, namely the agricultural land classification (ALC) grade and soil type and mineral reserves. This does not differentiate between the effects of various design elements that resulted in different sampling intensities of land and soil. In this survey approach was recognition that the potential effects of some parts of the scheme were elevated relative to others. It was anticipated that this differentiation would be reflected in section 13.10 presenting residual effects. Further breakdown of how the receptor is impacted by various components of the scheme would be expected, particularly to justify the stated low magnitude of impact. The absence of detail has the potential to obscure the extent of effects to Grade 2 and ungraded (potential Grade 2) land. Similarly, the low magnitude effect to Subgrade 3a land yields a minor (not significant) adverse effect but further detail on the extent of land use change was anticipated to justify this conclusion. Magnitude has not incorporated land use change for the creation of permanent woody habitat.
- 14.11 The beneficial effects to soil resources during the operational phase, as the land would not be cultivated and permanent vegetation cover maintained, are acknowledged. The application of magnitude and sensitivity criteria to the assessment to present a significant beneficial effect is likely to be overstated, with the beneficial effect felt by the Host Authorities to be minor and not significant.
- 14.12 Notwithstanding concerns over missing data and more detailed analysis of how scheme components result in adverse effects, the overall conclusions broadly meet professional judgement regarding the significance of residual effects. However, the significant benefit to the soil resource from resting the land from arable agriculture is considered overstated.

- 14.13 The use of embedded mitigation in preparation of a soil management plan (including records of soil movements and storage) is recognised. Additional missing information on soils and ALC grade is required for completion of a pre-construction detailed soil management plan. The statement that further mitigation, beyond the good practice measures of the soil management plan, is not practicable is acknowledged.
- 14.14 Overall, the submitted approach is considered to provide a suitable basis for Examination, subject to the matters identified above being addressed through the Examination process.

## **15.0 Socio-economics, land-use, and tourism**

- 15.1 It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities, and as subsequently notified to the Applicant who confirmed agreement, to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters.
- 15.2 The Socio-economics, Land-use and Tourism concerns raised are consistent across the three Host Authorities and therefore are not in this case separated out for each of the three Host Authorities.
- 15.3 This content is duplicated in Bedford Borough Council's RR but is included in Huntingdonshire District Council's RR for completeness.
- 15.4 Socio-economics, Land-use and Tourism matters are considered within Chapter 14 of the ES [APP-050]. The development has the potential to impact the economy, and land-use and tourism receptors through; land-take arising from construction activities and for operation of the project; worker requirements during all phases; changes in access to facilities during construction and decommissioning, and; when any of these impacts act in-combination with those from other developments. Effects will principally arise from employment and related impacts during construction and decommissioning and on journeys both for recreation and accessing services and facilities.
- 15.5 All Socio-economics, Land-use and Tourism matters raised by the Planning Inspectorate in its Scoping Opinion are considered to have been addressed in the ES with the exception of the following with the Host Authorities comments on this provided in this representation:  
a) ID 3.7.3 Effects on local services
- 15.6 The development has been assessed by the Applicant as resulting in a significant moderate beneficial effect on the economy at the local level and a not significant minor beneficial effect at a regional level during construction and decommissioning. The Applicant assesses economic impacts in relation to 30-minute and 90-minute drive times from the Site as explained at Paragraph 14.4.6. However, which constitutes a local and a regional level of impact for the purpose of the assessment is not explained. Estimated employment creation is presented for a 90 minute drive time only, with no further breakdown provided to confirm the scale of employment creation within a 30 minutes' drive time, which would, from the Host Authorities perspective, constitute local impact. For a significant moderate beneficial local economic effect to be realised as concluded in Chapter 14 of the ES, appropriate provision must be made in the DCO to deliver employment and skills benefits/opportunities locally.

- 15.7 An outline Skills Supply Chain and Employment Plan (oSSCEP) **[APP-163]** sets out the Applicant's strategy to maximise local employment, skills development and supply chain opportunities. This lacks specific detail with regards to existing local skills gaps and current levels of provision, and on specific initiatives which are tailored to addressing local employment issues and need. Detail of these should be provided in the document along with informed measures and outputs for delivering appropriate local employment and skills benefits/opportunities. A route map for developing the oSSCEP further should also be provided, including setting out when stakeholder engagement is needed and how it will take place.
- 15.8 The development has been identified as resulting in negligible effects on tourism during all phases. This includes in respect of impacts on users of Public Rights of Way. Mitigation measures in the outline Public Rights of Way Management Plan **[APP-160]** are referred to which would limit impacts. Paragraph 14.4.19 states that effects on PRoW are considered in relation to recreational and tourism use. However, no assessment of impacts on journey length and duration by residents for recreation has been presented, only impacts on tourism-related PRoW use. The Host Authorities consider that an assessment of impacts on all users of PRoWs should be provided to confirm that no significant effects would arise. HDC reserves the right to make further comment on the potential effect on tourism of the proposed development, subject to additional data gathering.
- 15.9 Impacts on local services have been addressed in respect of effects on the visitor accommodation sector from potential use of these facilities by construction workers. Effects on other services have not been identified in the ES. The Host Authorities consider there to be potential for effects in terms of severance of access to facilities, subject to the completion and findings of junction counts and assessments requested in Section 9 of this representation. The Host Authorities consider there to be the potential for impacts on healthcare services, and request that the Applicant provides information if no impacts are expected justifying why this will be the case, with reference to any mitigation measures as appropriate. This is particularly important in light of the absence of a Health chapter in the ES or Health Impact Assessment, which the Host Authorities would also liked to have seen in the Application to demonstrate that their residents health and wellbeing would not be adversely impacted by the Scheme during all phases of development.
- 15.10 There are some apparent errors and/or inconsistencies in application of the assessment methodology by the Applicant for some aspects. These will be explained in more detail in the Local Impact Report.
- 15.11 Overall, the submitted approach is considered to provide a suitable basis for Examination, subject to the matters identified above being addressed through the Examination process.
- 16.0 Climate Change**
- 16.1 It is noted that AECOM has been appointed under a Memorandum of Understanding between the three Host Authorities, and as subsequently notified to the Applicant who confirmed agreement, to act as an External Consultant on behalf of the three Host Authorities to assess this aspect and related matters.

- 16.2 The assessment of this aspect is common to each of the three Host Authorities, so the assessment does not differentiate between them. Instead, all of the points noted in relation to Climate Change below apply equally to each of the Host Authorities.
- 16.3 This content is duplicated in Bedford Borough Council's RR but is included in Huntingdonshire District Council's RR for completeness.
- 16.4 Climate Change has been considered by the Applicant as part of the Environmental Statement in Chapter 15 **[APP-051]** and supporting figures and appendices, building on matters raised during the earlier pre-application and PEIR consultation stages.
- 16.5 There are three distinct aspects to the climate change assessment: a Greenhouse Gas (GHG) Assessment looking at the impact on the climate of the Scheme; a Climate Change Risk Assessment (CCRA) looking at the resilience of the Scheme to a changing climate; and an In Combination Climate Change Impact (ICCI) assessment that considers how climate change may alter the potential effects identified by other technical assessments within the Environmental Statement.
- 16.6 The Host Authorities welcome the approach taken by the Applicant in carrying out the GHG Assessment and recognises that this is broadly aligned with the guidance issued by ISEP in February 2022. In relation to the GHG Assessment, the Host Authorities make the following observations, noting that none of them materially affect the overall outcome of the assessment:
- The assessment should explicitly recognise that the receptor for the GHG assessment is the global climate. This is implied but not stated.
  - The replacement frequency of components such as battery modules has the potential to affect the embodied emissions during the operational phase of the Proposed Development, and the impact of shorter life expectancies than those assumed should be considered.
  - The consumption of imported grid electricity during the operational phase has not been considered; the emissions impact is likely to be negligible in the overall context of the Scheme's whole life GHG impact, but it should be included for completeness.
  - The possibility of peat being discovered during the construction phase is acknowledged, but there is insufficient detail on the approach that the Applicant would take in this eventuality. The presence of peat within the site has the potential to substantially increase the GHG impact from land use change, so it is important that there is more clarity around any future peat management methodology.
  - The use of the BESS in a grid balancing capacity has the potential to make further GHG impacts through the displacement of fast response, gas fired peaking plant. Any savings so achieved would generally fall outside the scope of the core GHG assessment, but a discussion of the potential benefits would be useful. The December 2025 update to the National Policy Statement for nuclear energy generation (EN-7) should be taken into account in this respect.
  - The use of existing, unabated CCGT generating capacity as a counterfactual scenario is noted and broadly accepted, but PINS has been unwilling to accept the counterfactual use of CCGTs in previous planning decisions and the Beneficial evaluation of significance is contingent on this approach. The impact on the

evaluation of significance in the event of PINS not agreeing with this approach should be more fully considered.

- The Beneficial evaluation of significance means that embedded GHG mitigation measures have not been considered necessary; the Host Authorities would note that suitable GHG mitigation measures across all phases of the Scheme should always be considered and secured by the DCO if found practicable.

- 16.7 The Host Authorities welcome the methodology applied to the Climate Change Risk Assessment (CCRA) and note that it is consistent with guidance issued by ISEP.
- 16.8 In reference to the CCRA, an inconsistent use of historic climate data is apparent. The current baseline uses data for Bedford for the period 1991-2020 while the future baseline uses data for the same location from 1981-2010. This inconsistency is unlikely to compromise the overall outcome of the CCRA, but it should be addressed.
- 16.9 The Host Authorities welcome the approach taken in relation to the In-Combination Climate Change Impacts (ICCI) assessment, and do not have any comments to make in relation to it.
- 16.10 Overall, the submitted approach is considered to provide a suitable basis for Examination, subject to the matters identified above being addressed through the Examination process.

## **17.0 Cumulative and In-Combination Effects**

- 17.1 The following comments are made with reference to the following documents:
- Environmental Statement - Vol 1 Chapter 17 Cumulative and In Combination Effects P01 **[APP-053]**
  - ES Vol 2 Appendix 4-4: Long List of Other Development **[APP-067]**
  - ES Vol 2 Appendix 4-5: Short List of Other Development **[APP-068]**
- 17.2 The long and short list of 'Other Developments' is supported, however the status of High Wood Solar (HDC ref. 22/01813/FUL; BBC ref. 22/01998/MAF) should be updated on the Short List **[APP-068]** to reflect that a decision has been issued.
- 17.3 Cumulative and in-combination effects are a key consideration given that there are a number of existing and approved solar developments and a BESS scheme in the surrounding area (falling within both HDC's and BBC's administrative boundaries). This Scheme, High Wood Solar Farm, and the existing Staughton Airfield Solar Farm would increase the concentration of solar development in this part of the Southern Wolds LCA, which is acknowledged in the Applicant's ES.
- 17.4 High Wood Solar Farm (HDC ref. 22/01813/FUL; BBC ref. 22/01998/MAF) is immediately adjacent to Site D (southern boundary of Site D abuts High Wood's northern boundary), and Site C lies ~0.7 km north-west of High Wood at its nearest point. High Wood is the primary cumulative scheme considered across all topic areas in the ES due to its proximity and potential overlap for all phases (construction, operational and decommissioning) which is supported.

- 17.5 The Council will provide detailed comments on cumulative and combined impacts in its WR and LIR, focusing on topic areas where it holds technical expertise or statutory responsibilities.

#### **18.0 Draft Development Consent Order/s106 Agreement**

- 18.1 HDC will provide detailed comments on the draft DCO [APP-016] in due course. The key issues for focus will include the scope of the authorised development, the schedule and drafting of requirements. HDC expect their views on the drafting and approvals process for DCO requirements to be given significant weight in their role of ensuring that the impacts upon our local environment and communities are minimised, and as an approving and enforcement authority. HDC will also provide further detailed comments on the submitted Outline Management Plans [APP-155 to APP-167] where appropriate.
- 18.2 It is noted that the Applicant is committing to delivering 70% net gain in area-based habitat units, 30% net gain in hedgerow units and 5% in watercourse units, a proportion of which will fall within HDC's administrative boundary. The Council has recently introduced fee charging for BNG monitoring on planning applications. It will therefore seek to ensure that an appropriate fee is set for monitoring BNG, ecology and landscape mitigation works in respect of the project should the responsibility for this duty fall upon HDC. We expect that as this will involve a financial element a Section 106 Agreement will be required.
- 18.3 Financial provisions to ensure the funding and delivery of the strengthened and supplemented landscape character post-operation as per Design Principle 7 and as shown on the landscape Illustrative Environmental Masterplan will be required within the Section 106 agreement, potentially to include a bond or other insurance-backed funding guarantee.

#### **19.0 Community Benefits**

- 19.1 Although Community Benefits are not a material planning consideration, HDC and other host authorities intend to work with affected parishes on a suitable mechanism for collecting and implementing a community benefit fund as a means by which to secure benefits if the project receives consent.
- 19.2 The amount currently being offered by the applicant (£400 per MW per year) is noted. Negotiations on a community benefit are expected to continue alongside the planning process and will be supplemental to any section 106 agreement required to mitigate the adverse impacts of development.

#### **Summary and Conclusion**

In conclusion, these RR contain high level observations made by Council Officers under delegated authority, however, as the Council's formal statements of impact will be set out in our LIR and Written Representations, the broad content of this RR is made without prejudice. As host authority and interested party for the project, the Council will be taking a full and active role in the examination process and welcomes the opportunity to provide our views on matters of local importance.

I trust that this information is of assistance to you. Should you wish to discuss this matter further then please contact Lucy Pateman by email: [lucy.pateman@huntingdonshire.gov.uk](mailto:lucy.pateman@huntingdonshire.gov.uk).

Yours Sincerely

A handwritten signature in dark ink, appearing to read 'C. Kerr'.

**Clara Kerr – Head of Planning, Infrastructure & Public Protection (Chief Planning Officer)**  
**Development Services**  
**Corporate Delivery**  
**Huntingdonshire District Council**