



BSSL Cambsbed 1 Limited
c/o Tom Roseblade
Axis
Issued by email:
info@eastparkenergy.co.uk

Ext:
Email: planning@bedford.gov.uk
Date: 29 October 2024

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT PROCEDURE ORDER BBC APPLICATION NO: 24/01934/LPA

REF: East Park Energy

Bedford Borough Council has the following COMMENTS to make with regard to the proposed Development as notified – PINs Ref. EN010141

BBC Reference No.: 24/01934/LPA

PROMOTOR: BSSL Cambsbed 1 Limited, a subsidiary of Brockwell Storage and Solar Limited (the 'Promotor').

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT:

The Promotor's EIA Scoping Report (October 2023): The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site Battery Energy Storage System (BESS) on land to the north-west of St Neots. The Development includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

BBC's consultation response (28.11.2023): The Application comprises the construction of a new ground-mounted solar photovoltaic energy generating station (upto 400MW), an on-site Battery Energy Storage System (BESS)(storage upto 100MW) and East Park substation, infrastructure for connection to the national grid at the Eaton Socon National Grid Substation, a storage and maintenance building and associated parking, site accesses, internal access tracks, and associated landscaping and biodiversity enhancements on (circa 768 hectares) land to the north-west of St Neots between Keysoe Pertenhall and Little Staughton, Bedfordshire.

Promotor's Section 48 notification (24 September 2024): the description as set-out in totality.

(the proposed 'Development')

ASSESSMENT & COMMENT

In terms of the Promotor's notification letter, 23 September 2024, Bedford Borough Council (BBC) acting as statutory consultee under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations) and Notification under Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), have reviewed the Promotor's submitted material and, as assessed, raise the matters set out in this response for consideration.

Further, in the Promotor's letter *'The proposed development is also an Environmental Impact Assessment ("EIA") development under the EIA Regulations, An Environmental Statement CES') will accompany the DCO application. To support the statutory consultation, we have published and are consulting on a Preliminary Environmental Information Report ("PEIR")*. For completeness, BBC note that they have made an extensive response to the Promotor's EIA Scoping Report (October 2023), dated 28.11.2023, matters raised remain applicable to this PEIR consultation and, for brevity, will not be revisited in this response. However, BBC recognises the Planning Inspector's Scoping Opinion, dated 8 December 2023, as the final matter in this regard.

EXECUTIVE SUMMARY (Matters)

1. BESS facility

- 1.1 **Significant concern:** while it is acknowledged that the National Fire Chiefs Council's 'Grid Scale Battery Energy Storage Systems planning – Guidance for Fire and Rescue Services' (November 2022; Version 1) is not adopted planning policy and carries no weight in determination, in light of a near total lack of planning policy with regards to BESS fire safety management, it is suggested that the matters raised in the Guidance suggesting the need for dual points of access (to address changing wind directions); the requirements for open water storage ponds to contain contaminated fire water (which may be subject to flooding, breaching and/or potential leaching of contaminated fire water into the surrounding ground water and water courses) which needs to be discharged safely as part of a fire management strategy; and, noting that the LPA Fire Officer may review the Promotor's fire management strategy but is not empowered to 'sign-off' such a strategy, that these matters find some address in the considerations, recommendations, and determination with the Promotor. This is stated in reference to the Illustrative Environmental Masterplan showing the proposed alternative location of the BESS facilities.
- 1.2 It is noted in the PEIR Chp2 §2.4.51-54 and 2.4.58 that the Promotor has had initial discussions with the Cambridgeshire Fire and Rescue Service with regards to water storage tanks. This is most welcomed. Similar discussions should be held with Bedfordshire Fire and Rescue Service.

2. Cable route

- 2.1 For completeness, it is noted that the proposed cable route (Illustrative Environmental Masterplan Key Plan, Ref. Figure 2-2a; dated Sept 2024) crosses several public highways and consequently the Promotor will need to attain the necessary consent,

including agreeing to s106/ s278 etal and other financial contributions prior to construction. These should be negotiated with the relevant local planning authorities, specifically noting that this will be a cross-boundary Application.

- 2.2 It is noted that the Host Authority is not supportive of leaving underground ducting and cables in-situ at the Decommissioning Phase. The ducting and cables contain plastics and metals which are toxic and with gradual breakdown have the potential to leach into the surrounding ground and groundwater causing contamination. The Promotor should be obligated to return the Site, Cable Corridor, and possible servitudes within the Public Highways used by the proposed Development, free of such known contamination. It is noted that this approach would be supported by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 regarding long-term harm.

3. Fire/ Risk Management Plan

- 3.1 The Institute of Environmental Management and Assessment defines major accident and/or risk as *'Events that threaten immediate or delayed serious environmental effects to human health, welfare and / or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g. train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events'*. This should be read alongside the Chief Fire Officer's Guidelines. It is therefore incumbent on the Promotor to prepare a management plan accordingly.
- 3.2 While it is acknowledged that battery/ BESS fires are considered by the industry as rare, their occurrence should they occur should be seen as severe in terms of their impact on human health and potential environmental damage.
- 3.3 While not a direct planning matter, this risk, and related insurance, should be stated as solely the responsibility of the Promotor for the duration of the Development.

4. Operational Phase (inclusive of replacement)

- 4.1 Industry acknowledges that over time solar arrays lose their efficiency and are typically replaced on a circa 20-year time frame. Similarly, the batteries / BESS have a theoretical life span of 20-years. The time frame for this proposed Development is suggested as 40-years. In this regard, this replacement will generate considerable construction activity in say 20-years, comparable with the construction activity created at inception (i.e. it is not a benign Site for 40-years). Consequently, this replacement within the Operational Phase should have been addressed within the Environmental Statement and taken forward into the planning application. Currently this matter is not addressed.
- 4.2 For completeness it is suggested that the Operational Phase recognises this replacement during the lifetime of the proposed Development and that any 'severity'/ significant effect identified and then mitigated in the Construction Phase should then also be applicable to the Operational Phase. This should then be drawn through in to related address.

5. Manufacture, decommissioning and recycling

- 5.1 Should the solar arrays and BESS be made outside the UK (currently 80% of all arrays are manufactured in China and exported); and, after c.20/40-years be decommissioned / recycled outside the UK (currently, the bulk of used solar arrays are exported to and end up in landfill / landfill farms), then it is suggested that the international, cumulative impact should be acknowledged and addressed within the Promotor's submitted material. It is suggested that this statement is supported by the reading of the current High Court Ruling R (Finch) v Surrey County Council and others [2024] UKSC20, 20 June 2024, regarding effect generated by a development. It is noted that with current understanding, the short to long-term effects of solar array and BESS life-cycle supply chains are unknown to both the Host Authority and Promotor and consequently some caution has to be set-out in any future Application regarding such matters.
- 5.2 In terms of both the Operational (replacement and maintenance) and Decommissioning Phases regarding the recycling of materials / waste, the Promotor should have some acknowledgement / reference to the Waste Electrical and Electronic Equipment Regulations 2013. For the purposes of compliance with the Regulations, a producer refers to those that: a) manufacture and sell electrical and electronic equipment (EEE) under their own brand in the UK; b) buy EEE and then make changes to rebrand the product and resell to the UK market (If the maker's brand appears on the equipment, then they are the producer); c) import EEE on a commercial basis into the UK; and, d) are established outside of the UK and supply EEE directly to the UK market by distance selling (e.g. online, mail order or by phone). The definition of producer is sufficiently broad that businesses importing solar / PV panels for installation on large-scale commercial and renewable developments are likely to be included. All producers of EEE are legally required to register with an approved producer compliance scheme (PCS), an industry-managed take-back and recycling initiative. Through registration with a PCS, producers finance the cost of collection, treatment, recycling and disposal of both their own EEE placed on the UK market and any WEEE that their products replace. Potential evidence of registration could potentially be made a Condition.
- 5.3 Research on potentially hazardous materials used in solar panel manufacture indicates that different solar panels have different metals present in the semiconductor and solder. Some of these metals (for example lead and cadmium) are harmful to human health and the environment at high levels and may leach out / be released during repairs / maintenance to individual site panels, permeating into the local soils, ground water, and water courses. The same applies to BESS facilities.
- 5.4 Whilst these matters are not strictly a planning matter (rather one of compliance with other legislation), a more detailed assessment of the operational and decommissioning phases regarding the recycling of materials / waste is required by the EIA Regulations in terms of an assessment of long-term, transboundary effect.
- 5.5 In this regard, the Promotor is referred to Schedule 4(5) of the EIA Regulations '*the description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, **transboundary**, short-term, medium-term and **long-term**, permanent and temporary, positive and negative effects of the development. This description should take into*

*account the environmental protection objectives established at Union level or United Kingdom level which are relevant to the project...'; and, Schedule 4(6) 'A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or **lack of knowledge**) encountered compiling the required information and the main uncertainties involved'. [enbolded by Case Officer]*

- 5.6 As a minimum, these matters should be addressed by the Promotor in supporting material to a future Application.

6. Post-decommissioning: soil

- 6.1 §13.1.2 It is noted that *'a detailed agricultural land classification is currently being undertaken across the Site, and this Chapter therefore presents a preliminary assessment of the likely impacts and effects of the Scheme'*. Consequently, the Host Authorities reserves the right to comment on this chapter aspect through technical working groups and future consultation.
- 6.2 Currently, there is no evidence that after decommissioning the Site will revert to arable use for food production/ habitat creation (with ref. NPS EN5 §2.0.25 *'to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment **must guarantee** appropriate handling of soil, backfilling, and **return of the land** to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land'*). Arable soil is a three-dimensional, living bio-habitat and there is very limited research regarding the actions required (in terms of augmenting soil nutrients) and duration to bring soil back to production potential after lying 40-years dormant. Consequently, the Promotor's address should be read with some caution.
- 6.3 While the Promotor recognises the matter of soil health, NPS EN5 requires the Promotor to 'guarantee' bringing the soil back to its baseline ALC. The Promotor has submitted no such strategy.

7. Conclusion

- 7.1 Bedford Borough Council notes their in-principle agreement with the material as submitted to support any future Application, albeit that matters have been raised in this response which in its opinion needs address by the Promotor prior to submission.
- 7.2 BBC reserves its right to comment upon any further material submitted by the Promotor to support this application.

This response is solely that of Bedford Borough Council, submitted without prejudice.

Should you require any clarification, please contact: Peter Dijkhuis (BBC Planning Case Officer): Peter.dijkhuis@bedford.gov.uk.

Planning Services

Date: 29 October 2024

East Park Energy: comments on the Promotor's statutory consultation

This document sets out the response by Bedford Borough Council (BBC) regarding the Promotor's Preliminary Environmental Information Report (PEIR) (September 2024) for the East Park Energy proposals.

To aid reading and assessment, the three Host Authorities (Cambridgeshire County Council, Huntingdonshire District Council, and BBC) have adopted a similar template in addressing the chapters set out in the Promotor's PEIR. It is noted that there is regular consultation between the Promotor and the Host Authorities and consequently there may be a similarity of response across technical disciplines to matters.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
PEIR Chapter 1: Introduction (BBC Review: Planning Case Officer - Peter Dijkhuis)	§1.1.2 <i>'Regulation 12 states that the purpose of the PEIR...is to provide sufficient information to enable stakeholders to develop an informed view of the likely significant effects...(Section 8) explains that the PEIR does not need to constitute a complete assessment and is a compilation of the environmental information available at the point in time the PEIR has been produced'</i>. This statement is noted, and the Host Authorities reserve the right to comment further on matters as they arise and to material submitted by the Promotor in any future Application made. Further, in this regard, it is noted that the Host Authorities do not have a full complement of in-house technical disciplines to respond to such a complex Pier and future Application and are engaged with the Promotor through a Planning Performance Agreement (PPA) in instructing an External Consultant with the necessary technical disciplines to respond, but this Agreement has not yet been concluded between Parties. §1.2.3 BBC would suggest that the statement <i>'construction is anticipated to commence in Summer 2027 and to be completed for operation in late 2029 or early 2030'</i> is misleading. Industry acknowledges that, over time, solar arrays lose their efficiency and are typically replaced on a circa 20-year time frame. Similarly, the batteries / BESS have a theoretical life span of 20-years. The time frame for this proposed Development is suggested as 40-years. In this regard, this replacement will generate considerable construction activity in say 20-years, commiserate with the construction activity created at inception (i.e. it is not a benign Site for 40-years). Consequently, this replacement within the Operational Phase should have been addressed within the PIER and taken forward into the Environmental Statement and future planning application. Currently this matter is not addressed. Consequently, for completeness it is suggested that the Operational Phase recognises this replacement during the lifetime of the proposed Development and that any 'severity'/ significant effect identified and then mitigated in the Construction Phase may also be

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	applicable to the Operational Phase. This should then be drawn through in to related address.
PEIR Chapter 2: The Scheme (BBC Review: Planning Case Officer - Peter Dijkhuis)	§2.3.2 <i>'The technology associated with solar development is advancing rapidly,...'</i>. In this regard, BBC refers the Promotor to the Executive Summary Issue No.5 (Manufacture, decommissioning and recycling) and Issue No. 6 (Post-decommissioning: soil) in reference to Schedule 4(5) of the EIA Regulations <i>'the description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union level or United Kingdom level which are relevant to the project...'</i>; and, Schedule 4(6) <i>'A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved'</i>. The nature of both recycling of materials and re-establishment of arable soil are either unknown and/or unproven and consequently the current open-ended statements made by the Promotor in this regard needs some caveat and caution in both the 20-year replacement and 40-year decommissioning phase. §2.4.2, §2.4.3 and PIER Vol3 Figures 2-1b to 2-1g <i>'Work No. 8 – works to create, enhance and maintain green infrastructure'</i>: a) BBC suggest that these Figures are <u>indicative</u> in terms of intent regarding landscaping works, but that they remain open to discussion with the Host Authorities; b) While the Promotor has introducing landscape buffers/ corridors to boundary areas it is unclear if these are of sufficient width to form meaningful screening to the development. As a minimum suggest eight-meter widths should be agreed and annotated on the Figures accordingly (It is noted in the body of the reports dimensions are mentioned, but Plan annotations would aid clarify); c) BBC express concern that the retained landscape to the various river corridors appear either non-existent, or exceptionally narrow, and that these should be protected, say at a minimum of eight-meters from watercourse centreline; d) The Figures do not identify protected woodlands and hedgerows making it difficult to read if these too will be afforded a margin of landscape protection; and, as currently presented, BBC are not supportive of these Figures 2-1b to 2-1g. BBC are supportive of the Illustrative Environmental Masterplan (1of14) subject to the above clarification. §2.4.4 onwards Work No.1 (ground mounted solar photovoltaic generating station, inverters, solar transformers, switchgear), Work No. 2 – a Battery Energy Storage System (including battery transformers, auxiliary transformers, control building), Work No. 3 – an on-site substation (East Park Substation), etc: it is unclear from these paragraphs how the cabling between individual components

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	internal to the solar farm are addressed (refer to §2.4.11 which BBC suggests needs more clarification). Should any cabling be located underground, then it would be a requirement that these are all removed at the Decommissioning Phase. §2.4.58 [Firewater] <i>'The NFCC guidance for BESS notes that consideration should be given within the site design to the management of water run-off such that in an emergency situation where polluted water may run-off from the facility this can be safely contained and treated, rather than risking pollution of groundwater or local watercourses'</i>. It is noted that the management and <u>removal</u> of contaminated firewater needs specific address in any Operational Environmental Management Plan including an emergency strategy should such firewater breach into river catchment areas and/or leach into ground water or soils. §2.4.60 <i>'The internal roads to the BESS would be constructed of tarmac, concrete or similar to allow for heavier vehicles during construction and decommissioning, and safe access for fire services in emergency situations'</i>. It would be a requirement that all routes, hardstanding areas, §2.4.87/96-98 Cable Joining Chambers, §2.4.133 Retention Basin, Work No. 9 (access), and all concrete foundation/ works are removed at the Decommissioning Phase (to prevent long-term leaching, contamination, and in the interest of public safety regarding sunken chambers). §2.4.119 (and Table 2-26/27/28) <i>'The access tracks will be required to cross a number of watercourses...will be culverted'</i>. It is suggested that this matter is addressed as a detailed design matter and may require consent from the LLFA. The matter could be addressed by way of a pre-commencement Condition. It would be a requirement that all culverts are removed at the Decommissioning Phase and the watercourse topography and vegetation reinstated. §2.4.147/151 and Illustrative Environmental Masterplan (PEIR Volume 3 Figure 2-2) (Work No.8 Green infrastructure): refer to response above. §2.4.149 <i>'An Outline Landscape and Ecological Management Plan (oLEMP) has been prepared which covers the Construction, Operational and Decommissioning Phases'</i>. In light of the potential significant works that may be required circa 20-years at the replacement of the solar arrays and BESS, it is suggested that when this occurs, the oLEMP is reviewed in terms of any harm occurring to the landscape/ habitat and that the Promotor is required to produce a mitigation and planting/ habitat strategy to address such harm; i.e. the LEMP should remain 'live' for the duration of the Development. §2.5.4 (xi) (Construction of East Park Sites A, B C and D (Months 2 to 30)): (m) <i>'Establishment of soft landscaping in areas of habitat mitigation'</i>. BBC are not supportive of this extensive period to undertake soft landscape and habitat works (with reference to the Promotor's Illustrative Environmental Masterplan). BBC would seek a Condition that the soft landscaping works are

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	implemented within the first year of construction, to then enable a two-year establishment and replacement review with potential remediation strategy, prior to construction moving off site. Further, strong penalties should be put in place in any consent given, should the Promotor not instate the soft landscape and habitat works as then consented. §2.5.5 vs 2.5.14 (Construction staff) the Promotor anticipates construction staff to be circa 496. For completeness this figure needs to be cross-checked against the Transport Statement for both the Construction Phase and any 20Y Replacement Phase. §2.5.22/24 (Vegetation clearance) For completeness it is assumed that woodlands, trees and/or hedgerows that are cleared will be replaced on a like-for-like basis and addressed within the Construction Environmental Management Plan (CEMP). Vegetation to be removed to facilitate access and/or visibility splays will be replaced on a similar basis to mitigate the long-term fragmentation of the countryside hedgerows currently framing fields and the public highway. §2.5.25/28 (Public Rights of Way) It is noted that some of these routes may be bridleways and consequently any temporary relocation should make provision for the access and safety of horse and horse-riders. §2.6.2 <i>'three FTE roles working in land management including landscape maintenance and agriculture'</i>. BBC note our support to the Promotor's commitment to appointing this workforce to manage the landscape and habitat for the duration of the Development but would like to see these roles set out specifically as part of both the CEMP and the Landscape and Ecological Management Plan. §2.6.5/7 and Table 2-35 (Indicative Operational Lifespan of Scheme Components): BBC are not supportive of this rather generic table as noted above in terms of a possible Maintenance (Construction) Phase which should have some address in this Application and Outline Operational Environmental Management Plan (oOEMP). §2.7.1 (Decommissioning Phase) <i>'When the operational phase ends the Scheme will require decommissioning. All solar PV modules, mounting poles, cabling, inverters, transformers, BESS equipment, the East Park Substation, and fencing would be removed from the Site and recycled or disposed of in accordance with good practice and market conditions at that time. Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would be left in situ. The Site will be returned to a condition suitable for return to its original use...'</i>. BBC comment as follows: a) Recycling of all materials should be undertaken in accordance with say the Waste Electrical and Electronic Equipment Regulations 2013 or similar national legislation/ regulations. This is not a 'market conditions' matter; b) As noted, all hard standing and concrete works should be removed;

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	c) BBC are not supportive of leaving underground ducting and cables in-situ at the Decommissioning Phase. The ducting and cables contain plastics and metals which are toxic and with gradual breakdown have the potential to leach into the surrounding ground and groundwater causing contamination. The Promotor should be obligated to return the Site, Cable Corridor, and possible servitudes within the Public Highways used by the proposed Development, free of such known contamination. It is noted that this approach would be supported by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 regarding long-term harm; and, d) Currently, there is no evidence commitment that after decommissioning the Site will revert to arable use for food production/ habitat creation (with ref. NPS EN5 §2.0.25 '<i>to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land</i>'). Arable soil is a three-dimensional, living bio-habitat and there is very limited research regarding the actions required (in terms of augmenting soil nutrients) and duration to bring soil back to production potential. Consequently, this matter should be addressed within any decommissioning strategy inclusive of soil testing and the potential for an augmentation strategy. §2.7.5 '<i>The effects of decommissioning are often similar to, or to a lesser magnitude than, the construction effects and will be considered where possible in the relevant sections of the ES. However, there can be a high degree of uncertainty regarding decommissioning as engineering approaches and technologies evolve over the operational life of the Development</i>'. BBC would suggest that this is a rather open-ended statement, and that the Promotor should carry such known and unknown risk for, as a minimum, for the duration of the Development and that this matter should be reflected in any Operational Environmental Management Plan. The Promotor has submitted the following outline management plans to guide Development. These, as a minimum, should form part of any consent given: a) Landscape and Ecological Management Plan (LEMP). This should include a Five-year replanting strategy (to address failure of first-planting) during both the Construction Phase and the Operational Phase – Replacement. b) Construction Environmental Management Plan (CEMP). It is suggested that this includes an approach to the operational replacement of solar arrays and the BESS facility during the lifetime of the proposed Development. c) Operational Environmental Management Plan (OEMP) d) Decommissioning Environmental Management Plan (DEMP) e) Construction Transport Management Plan (CTMP) The Host Authority notes that, as this is a cross-boundary Application, the Promotor may wish to give some consideration as to

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	how these management plans are discharged.
PEIR Chapter 3: Alternatives and design evolution (BBC Review: Planning Case Officer - Peter Dijkhuis)	In terms of §3.3.1/3 (site requirements), BBC do not have the necessary technical expertise to comment and consequently take these project requirements as read. §3.4.4 ‘...the construction corridor for the grid connection is expected to be up to 25m wide’. For clarity, this dimension should be denoted on the Illustrative Environmental Masterplan(s) to understand potential harm (width) to the existing landscape along this corridor.
PEIR Chapter 4 EIA Methodology (BBC Review: Planning Case Officer - Peter Dijkhuis)	§4.2.2 (PPA) and §4.2.3 (Technical meetings): The Host Authorities acknowledge both statements made. §4.3.11 (Operational Phase) ‘<i>The effects of the Scheme once operational will be restricted to its operation, use, and maintenance of the equipment and landscaping</i>’. A central approach to the PEIR and all supporting material, is the Promotor’s broad assumption that the Operational Phase will be benign (i.e. limited to landscape and infrastructure maintenance). In reality this Phase may include the total replacement of all solar arrays and BESS batteries when they fall below operational efficiencies, and that this replacement will generate considerable construction activity in say 20-years, commiserate with the construction activity created at inception. Further, this construction activity may require the cut-back/ removal of existing and instated landscaping to facilitate access. Consequently, this replacement within the Operational Phase needs to be addressed within the Environmental Statement. Currently this matter is not addressed. §4.3.15 (Decommissioning Phase) ‘<i>The effects of the Scheme at decommissioning are similar in nature to the Construction Phase</i>’ – again the matter of harm to an existing and instated landscaping to facilitate access is raised and will need address. Further, the Promotor will need to table a Soil Management Plan to ensure that the land is brought back to arable use. §4.3.26 (Design Objectives) In principle, BBC are supportive of the seven Design Objectives set out. However, the Promotor offers no methodology regarding an assessment when there are conflicting demands and effects as to how the Design Objectives will then be weighted-up. §4.3.28/29 ‘<i>The final management plans would be in substantial accordance with the outline management plans, and will be a requirement of the DCO for submission and approval by the relevant planning authorities</i>’. BBC are supportive of the intent to submit the outline/ detailed management plans as listed.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
PEIR Chapter 5 Landscape and Visual (BBC Review: Planning Case Officer - Peter Dijkhuis)	It is noted that the Host Authorities do not have a full complement of in-house technical disciplines to respond to such a complex Pier and future Application and are engaged with the Promotor through a Planning Performance Agreement (PPA) in instructing an External Consultant with the necessary technical disciplines to respond, but this Agreement has not yet been concluded between Parties. The Host Authorities reserves the right to comment on this chapter aspect through technical working groups and future consultation.
PEIR Chapter 6 Cultural Heritage and Archaeology (BBC Review: Archaeology Officer - Geoff Sanders)	1. Thank you for consulting the Bedford Borough Historic Environment Team (Archaeology) on the above s46 consultation. BBC (Archaeology) have had regular meetings and correspondence with the Promotor and their archaeological consultants where BBC have set out their requirements for archaeological evaluation of the proposed Development. These have also included preliminary discussions on the likely mitigation requirements at the Site should development proceed, although it should be noted that any detailed mitigation strategy will need to be based on the full detailed evaluation results. Note that these comments only apply to the areas of the Development that fall within Bedford Borough. It is noted that the Cambridgeshire Historic Environment Team has commented on the parts of the site that fall within Cambridgeshire. 2. The PEIR includes an archaeological desk-based assessment that appears to be well researched and presents a relatively accurate appraisal of the current known archaeological resource within the Site as well as an account of the development of the historic landscape through time. 3. With regards to the Settings Impact Assessment in Appendix 6-4, BBC are broadly in agreement with the conclusions reached in relation to impacts on the scheduled monuments within Bedford Borough. Note that more detailed consideration of setting impacts on heritage assets is provided by the Conservation Officer (see below). 4. Work on the agreed archaeological evaluation strategy has been progressing with a programme of geophysical survey and archaeological trial trenching. To date it should be noted that the trenching has only commenced within the Cambridgeshire parts of the scheme. Currently the proposed approach to evaluating the cable routes and the grid connection is to undertake further geophysical survey, other than in §6.4.6 no clear commitment has been made to allow trenching in these areas. In order to provide sufficient information to inform a suitable mitigation strategy that needs to be submitted with the DCO application BBC consider that intrusive trial trenching based upon the results of the geophysical survey in the cable routes and grid connection will be required.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	5. The PEIR identifies three potential mitigation options in §6.9.4 comprising 'no dig' construction, preservation by record (excavation), and revisions to the design and layout of the Development to avoid impacts. In theory these are potentially acceptable options, however they will need to be informed by the completed evaluation results. BBC have some concerns over 'no dig' solutions as in many instances these still require a reasonable amount of excavation i.e. for cabling, transformers, inverters and other associated infrastructure. BBC also note that while §6.9.4 sets out these three approaches to mitigation the 'preferred' option appears to be 'no dig' construction using concrete feet for the panels as set out in the final design principle in §2.4.12 and again in §6.7.8 as well as elsewhere in the PEIR. The 'no dig' option may not be appropriate in all archaeological areas. The detailed mitigation strategy based upon the results of the archaeological evaluation should be agreed with the relevant Host Authority in advance of the DCO. 6. With regards to §6.7.4, if green infrastructure is proposed in areas that have not been subject to archaeological evaluation or in areas proposed for preservation in situ then it will need to be designed in such a way as to achieve minimal ground disturbance. 7. To date little archaeological research has been undertaken on the potential impact that decommissioning of solar farms can have on underlying archaeological remains that have been 'preserved' within their area. BBC note that §6.8.61 states that potential harm to buried archaeological features from the removal of piles will be discussed with stakeholders, further to this an assumption is made regarding the removal of additional infrastructure that disturbance will be no greater than construction. BBC would like to see far more detail than that which has been provided to date in Chapter 6 of the PEIR or the outline Decommissioning Environmental Management Plan (DEMP), further assessment of the potential impacts on archaeological remains at this stage should be provided together with an appropriate methodology designed so as to minimise these impacts. Proceeding on the basis of 'assumptions' is not acceptable. 8. Table 6.8 will require updating following completion of the evaluation works. Woodland planting should be avoided over areas containing archaeological features unless mitigation measures are in place. Planting along existing boundaries excepted. 9. Table 6.9 will require updating following completion of the evaluation works. Woodland planting should be avoided over areas containing archaeological features unless mitigation measures are in place. Planting along existing boundaries excepted. 10. Table 6.10 should be updated following completion of the evaluation works. 11. With regards to §6.8.35, BBC have concern that areas of archaeological significance will be 'identified post determination'

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	this suggests an intention to undertake evaluation along the Grid Connection after determination of the DCO, this should be completed ahead of the any submission made so that appropriate detailed mitigation measures in this area can be agreed as part of the DCO process. 12. Table 6.14 will require updating following completion of the evaluation works. 13. With regards to §6.11.11, BBC have concerns with the first bullet point that notes completion of the geophysical survey '<i>so far as possible</i>' and the second bullet point that notes completion of the archaeological trial trenching '<i>so far as possible</i>'. BBC expect this work to be completed prior to submission and further to this additional trial trenching is likely to be required in the cable corridors and grid connection. 14. Given the lifespan of the proposed Development, BBC expect the archaeological mitigation strategy or the individual site WSIs to include ongoing management proposals so that areas where archaeological remains have been preserved are recognised in the event of maintenance requiring additional groundworks being identified during the Operational Phase. Provision should be made for these works to be mitigated if necessary. 15. The illustrative masterplan (PEIR Figure 2-2) shows the indicative locations of centralised inverters and transformers as well as proposed construction compounds - are these locations flexible so that they can be moved to avoid areas of significant archaeology? BBC note the plan is illustrative and would not expect it to be finalised until the completion of the archaeological evaluation. 16. In summary, the assessment of the archaeological potential of the proposal site is still at an early stage. The archaeological evaluation work should be completed ahead of the DCO submission. The results of the archaeological evaluation should be used to inform a detailed archaeological mitigation strategy for the scheme that will ideally be agreed with the relevant Host Authority ahead of the submission of the DCO. Dependent on the results of the evaluation the illustrative masterplan provided will also require updating to reflect necessary design changes. Further information is also required regarding potential impacts at the decommissioning stage of the development. 17. BCC has reviewed the response by Cambridgeshire Historic Environment Team and note that these responses should be read collectively.
PEIR Chapter 6 Cultural Heritage	1. The PEIR is intended to present the preliminary findings of the EIA and should allow consultation bodies to develop an informed view of the likely significant environmental effects. Appendix 6 is entitled 'Cultural heritage and archaeology' and

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
and Archaeology (BBC Review: Archaeology Officer - Jack Watkins)	includes a Desk Based Assessment (DBA) (Appendix 6-2); Photographic Record (6-3) and a Settings Impact Assessment (6-4). An Illustrative Environmental Masterplan (IEM) also indicates a way in which the Development might come forward. The DCO will be determined in accordance with EN-1 and EN-3, both of which have sections relating to the Historic Environment/Cultural Heritage. 2. Taking into account the ZTV assessment and nature of the Development in Sites A and B, BBC previously raised no issues with the 3km study area proposed at the Scoping Opinion stage. However, in their Scoping Opinion the Inspectorate considered that there was no robust justification for the 3km limit and advised that the ES should include an assessment of the potential setting impacts to designated heritage assets beyond 3km, or provide information demonstrating agreement with the relevant consultation bodies. In a subsequent meeting between the Proponent, Historic England and the local planning authority, it was confirmed that following further consideration BBC were content that there were no clear examples of assets located within the Borough beyond the 3km study area which might be impacted by the Development, although it is understood that in a separate meeting the Principal Archaeological Officer at the time asked for the non-designated ridge and furrow located in close proximity to All Saints Church, Little Staughton to be scoped into the ES (Asset No.299 in Document 6-4). BBC therefore raise no concerns regarding the study area or those assets scoped in/out of the PEIR. 3. The PEIR outlines the likely setting impacts on heritage assets in Document 6-4. The Historic Environment Team undertook a number of site visits in March 2024 relating to the proposed development, as well as further site visits in October 2024 following the submission of the PEIR. In most instances, BBC agree with the conclusions reached in the Settings Assessment Table in section 2 of the DBA. However, Officers wish to raise the following points relating to the Development: a) The Church of All Saints, Little Staughton (Grade I) is located on a ridge overlooking the wider landscape to the northwest, north and northeast – Pevsner describes it as a “dramatic picture” from this perspective. Due to its four-stage 15th century tower with 19th century spire (rebuilt 1910) and its prominent, exposed location, the church’s setting is extensive and it is clear that the church was originally designed to dominate the local landscape. As noted in the DBA, this includes the proposal Site where there would be ‘clear intervisibility’ not only from within the churchyard and immediate setting of the church (see PEIR Figures 5-55, 5-56 and 5-57), but also in a number of medium and long distance views to the north looking back towards the church; some of which include clear views of the nave and chancel as well as the tower (so that one is able to fully appreciate its significance). The Site’s rural character makes a strong contribution to the way in which the asset is experienced and understood – it reflects its original agricultural setting and its historic ties to the wider landscape. Views from within and around the site including from Staughton Road, footpaths 1 and 19 take in the immediate fields to the south of the church, including blocks of ridge and furrow. Peripheral in such views is the village (identified by

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	mature planting and rooftops) as well as St Peter's Church in Pertenhall to the west. Such views provide evidence of a historic, rural landscape and All Saints Church's place within it. The effect of placing large swathes of solar panels orientated southwards within the Site would be to erode the rural character of the landscape and introduce conspicuous and incongruous development in its place that would be highly visible given the change in levels. It would also take away from one's experience to the north where the relationship between the Church, Little Staughton and the wider landscape would be disrupted. The DBA suggests the Development would not affect the Church's prominence within the landscape, but from different perspectives the panels would draw undue attention away from the Church and its landmark value. Elements of its rural setting would be retained including immediate fields to the north and northeast, and there would be no direct impact on the fabric of the listed building. However, given the strong contribution setting makes to significance, of which the site forms a significant element, the Operational Phase would likely result in a moderate level of less than substantial harm to the significance of the Church, subject to full details. This would constitute a 'moderate significant effect' in EIA terms based on Table 11.6 of the Scoping Report. b) Glint and glare – this does not seem to be considered as a potential impact on heritage assets. For example, there are no 'glint and glare' receptors located within the churchyard at All Saints, Little Staughton, including from one apparent designed view from north of the church (where vegetation has been cleared in line with a bench). It is suggested that this should be considered in Appendix 5-6. c) The Setting Assessment Table identifies a number of circumstances in which an asset of low 'relative sensitivity' and a low 'magnitude of impact' would occur, a 'neutral impact' from the Operational Phase would arise. BBC appreciate that the assessment takes into account a large number of assets and the methodology attempts to provide a proportionate approach to assessing the likely impact of the development (and whether such impacts would result in 'significant effects' in EIA terms). 'Relative Sensitivity' was defined in §11.6.10 of the Scoping Report as an asset's '<i>capacity to retain its ability to contribute to our understanding and appreciation of the past in the face of changes to its setting</i>'. In a number of cases, especially relating to Grade II listed farmhouses and agricultural buildings, BBC are of the view that the relative sensitivity is likely to be higher than the 'low' level typically attributed in the Table where their rural setting has been largely retained. This is because such assets tend to draw strongly upon the rural landscape as part of their significance, and as such are likely to warrant a 'medium' or 'high' relative sensitivity. A low magnitude of impact in that instance is likely to translate to a low or minor level of less than substantial harm. Whilst not likely to be a 'significant effect' in EIA terms, such effects still need to be identified and the harm weighed accordingly against the public benefits flowing from the development as per §5.9.32 of EN-1.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	d) It would be useful to include Tables 11.4, 11.5 and 11.6 found within the EIA Scoping Report as part of Methodology section of the DBA, in order to provide context for the Settings Assessment Table. e) There is no real discussion relating to potential mitigation measures. The aim of any Development of this nature should be to identify adverse effects on heritage assets and seek to mitigate them as far as possible (particularly when 'significant effects' are identified). Whilst it is accepted that this currently appears to be a matter of disagreement between the Promotor and BBC, there are likely to be ways of mitigating the impact on All Saints Church further by through sensitive changes to the design and layout. If this is not possible – i.e. the amount of mitigation required would fundamentally compromise the aims of the Development, then this should be spelled out in the PIER in order to justify the harm caused to the asset. 4. In summary, BBC disagree with the findings of the PEIR in relation to the impact on All Saints Church, and whether or not a 'significant impact' is likely to arise. BBC would wish to see the ES explore potential ways of mitigating this impact. BBC note that the Settings Assessment Table has been provided without context and should be supported with the preamble provided in the Scoping Report. Though the table and the chosen methodology is effective in terms of identifying significant effects, there is concern that in a number of cases a degree of less than substantial harm may arise to a number of listed buildings where a neutral impact has been recorded.
PEIR Chapter 7 Ecology and Natural Conservation (BBC Review: Planning Case Officer - Peter Dijkhuis)	It is noted that the Host Authorities do not have a full complement of in-house technical disciplines to respond to such a complex PEIR and future Application and are engaged with the Promotor through a Planning Performance Agreement (PPA) in instructing an External Consultant with the necessary technical disciplines to respond, but this Agreement has not yet been concluded between Parties. §7.8.6 and §7.8.21 <i>'Hedgerow habitats will be almost entirely retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening required to permit Site access at ten locations and totalling 54m with no individual length of removal greater than 6m. Post-construction, seven crossing points, totalling 37m, will be reinstated. Implementation of the landscape design is discussed in relation to operational impacts'</i>. This matter should be read against the Highway Officer's comments regarding visibility splays at access points; and, concern stated elsewhere regarding the construction of temporary access routes and cable corridor widths across the Site and their effect on existing hedgerows and their related habitats. It is suggested that the harm/ effect could be larger than originally stated. If this is the case, then any mitigation measures would need to be re-visited. Consequently, the statements in §7.8.8, §7.8.9 et al <i>'Minor hedgerow removal'</i> may need review and are currently not supported.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	§7.8.71/73 (Operational Phase) As noted elsewhere, the Operational Phase - Replacement will include replacement of infrastructure and potential have a similar effect as that of the Construction Phase. §7.8.87 <i>'The illustrative landscape proposals on PEIR Volume 3 Figure 2-2 include the seeding of approximately 197 ha of species-diverse grassland and 464 ha of grazing pasture, and the planting of 13 ha of woodland and 352 trees'</i>. It would aid assessment if such environmental enhancements were set-out in a single table so that these can be reflect in management plans proposed. The Host Authorities reserves the right to comment on this chapter aspect through technical working groups and future consultation.
PEIR Chapter 7 Ecology and Natural Conservation (BBC Review: Tree Officer – Alan Elderton)	1. The vast majority of solar panels and underground cabling appear to have been positioned a suitable distance from nearby established trees and hedgerows so not to cause damage during their installation. Additionally, there appears to be a suitable distance between areas of existing trees and solar panels to not result in future pressure to prune or remove trees for reasons such as shading or leaf litter. 2. Regarding the Construction Phase, Section 5 of the PEIR Volume 2 Technical Appendices, Appendix 2-3: Outline Construction Environmental Management Plan states that existing trees and vegetation will be protected in accordance with British Standard (BS) 5837:2012. However, details such as Tree Protection Plans specifying where protective measures in accordance with BS 5837:2012 will be implemented have not been provided. 3. Without Tree Protection Plans (TPPs), the PEIR cannot clearly demonstrate exactly how nearby trees and hedgerows will be protected during construction. TPPs for areas such as new site accesses are likely to be required as trees in these areas have higher public visibility and construction traffic and movement of materials will be most prevalent. 4. Areas of hedgerow to be removed for temporary access within the Site will mostly have minimal impact upon local amenity due to their secluded locations. In areas along the Public Highway these will be highly visible. Appropriate mitigation planting has been proposed to reinstate hedgerow lost for access purposes (although concerns is raised elsewhere regarding the fully length of visibility splays to be used at access points). 5. Proposed species for Woodland and Woodland Belts could benefit from incorporating additional large native tree species.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	Including species such as Common Beech, Dutch Elm Disease resistant Elm species, Hornbeam and Lime will provide long-term improvements to woodland biodiversity and ecological habitat. 6. Additionally, incorporating fruit trees such as Cherry and Plum species could improve habitat for pollinating insects. Given the significant size of the Development, incorporating UK native non-deciduous species such as Yew, Pine and Holly where site conditions allow would further improve biodiversity. This would aid in diversifying the character and appearance of different sections of woodland throughout the Development. 7. Vast areas of land are designated as proposed species diverse open grassland. To improve local tree cover it is recommended more areas of woodland or woodland belts are incorporated into the Development. Conclusion: 8. To ensure nearby trees and hedgerows are protected during construction, there should be conditions imposed requiring the installation of protective measures and that working methods are undertaken in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction – Recommendations. 9. It is recommended the discussed amendments are made to the environmental masterplan and included in the related management plans. 10. It is suggested that the comments made if incorporated will aid in improving woodland and woodland belt biodiversity and ecological habitat. 11. REASON: To make adequate provision for the appropriate preservation of trees and hedgerows to ensure the long-term success and establishment of trees and other landscaping to enhance the appearance of the proposed development in accordance with s197 of the Town and Country Planning Act 1990, current industry guidance and Policies 35s, 37, 38 and 39 of the Bedford Borough Local Plan 2030.
PEIR Chapter 8 Hydrology and Flood Risk	Host Authority response (CCC): 1. The proposals with regard to the Construction Phase of the solar farm are supported by the Lead Local Flood Authority (LLFA) and give consideration to water quality aspects as well as management of surface water. The use of swales promotes

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
(CCC Review: Flood Officer)	biodiversity. It is noted that proposed lagoons will be utilised during construction for sediment settlement, and these will be retained for the Operational Phase, however, it is not clear that there will be a suitable control on runoff rates during the Construction Phase. 2. The Development has given consideration for access for maintenance of the existing and proposed surface water drainage features. It is proposed that 3m maintenance strips are provided to the swales which is supported by the LLFA. The Promotor should ensure that all watercourses are maintained and remediated (where necessary) throughout each phase of the development, with obstructions to flows (such as debris, litter, and fallen trees) removed. 3. It is proposed that appropriate measures will be remediated and retained during the Operational Phase which is supported by the LLFA and the Host Authority look forward to more details being provided. However, these aspects mainly focus on the access tracks and Battery Energy Storage System (BESS) areas. Rainfall upon solar arrays are generally shed between rows and allowed to run onto the ground. This concentration of water flow can create channelised flows which can erode the soil and allow a greater volume to enter watercourses or flow to adjacent areas at a greater rate than would otherwise occur in greenfield conditions. Therefore, further consideration should be given to drainage of the solar array areas - particularly during the establishment of vegetation. This may include the inclusion of filter drains between solar arrays or swales at the lowest points of the site to prevent channelling of water and promote infiltration. 4. High surface water flood risk is present on all sites (A - D). Altering natural flow paths should be avoided where possible and consideration should be given to the design and layout of the BESS. 5. Watercourse crossings will be subject to agreement with the LLFA. It is assumed this will be through the DCO protective provisions. Further clarity should be provided at this point around the culvert design, as this will make up part of the agreed drainage under the DCO permission. 6. What the Host Authority and LLFA would require under the wider DCO: a) Hydraulic calculations including the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storms. FEH 2022 rainfall data required and suitable climate change for 3.3% and 1% AEP. b) Details drainage layout plans for the solar array rows and BESS unit areas for each catchment. c) Detailed SuDS and drainage proposals to protect the receiving watercourse for the construction, operation, and decommission. d) Modelling for the 0.1% AEP SWFR extent not available (see Figure 8-3).

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
(BBC Review: Flood Officer - Ollie Ewington)	e) Demonstration of pollution risk areas and how water is managed during all phases in detail for each catchment, ensuring water is suitably managed. f) Infiltration testing to confirm rates if viable. g) Flow rates for each individual catchment. h) Maintenance proposals in line with best practice guidance. i) Sight of the Watercourse Crossings Review document. Host Authority response (BBC): 7. BBC have read the Promotor's Chapter 8 (Hydrology and Flood Risk) report and support the more detailed comments made by CCC (set out above). 8. Infiltration testing is required to confirm rates if viable for each catchment. 9. Flow rates for each individual catchment are required. 10. Rows of solar arrays lead to rainfall shed to the ground between the rows and depending upon infiltration rates can lead to additional runoff to adjacent watercourses, especially as gradients increase. This can exceed Greenfield runoff rates. Detailed information is required to demonstrate how this additional runoff will be managed for the solar array areas via swales, filter drains etc. This is particularly important prior to vegetation becoming fully established. 11. The Promotor should ensure that all existing watercourses are maintained and remediated throughout each phase of the Development. All obstructions to watercourses should be removed during and after construction. Maintenance proposals are required for SuDS proposals and existing watercourses during and post construction. 12. Any structures within the banks of watercourses such as culverts to allow access over, will require Ordinary Watercourse Consent from the LLFA. 13. Detailed drainage layout plans are required for the BESS unit areas and solar array rows and for each catchment.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	14. Detailed hydraulic calculations are required including the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storms. FEH 2022 rainfall data is required and suitable climate change values for 3.3% and 1% Annual Exceedance Probability (AEP) storms. 15. BBC reserves the right to comment on this chapter aspect through technical working groups and future consultation.
PEIR Chapter 9 Traffic and Transport (CCC Review: Highways Officer)	Host Authority response (CCC): 1. No details have been provided regarding the geometric layouts of the proposed accesses to the public highway. 2. Condition surveys will be required prior to the construction phase commencing, to assess any related damage to the approach roads and an agreement to remediate any damage caused by the Development subsequently. Restoration of temporary access points should be subject to a pre-development condition as to be agreed with and authorised by the relevant Host Authorities. 3. Access SA16: a) Given the amount of access movements, consideration should be given to the signalisation of this main access through peak hours of operation which may require a temporary traffic regulation order to reduce the speed limit locally, on the approaches to the signals. b) Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used. c) The access future use, after construction: will the accesses be returned to verge / closed or continued to be used through the operational phase for maintenance purposes; and, if so at what frequency. d) Any alteration or piping of ditches and/or culverts to provide or improvements to existing accesses will require LLFA approval. e) After comparison with highway boundary records, the visibility splays shown appear to fall outside the highway extent. This contradicts the statement at §2.4.154 and 2.4.155. There may be features present on the ground, which are not captured on mapping, that alter the assumed location of the highway boundary. For example not all ditches are shown

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	on Ordnance Survey mapping, but these are generally considered not to form part of the highway. Therefore any proposed visibility splay will need to be considerate of on-the-ground features and not simply modelled from a map. Acquisition of additional land may be required to ensure visibility splays can be delivered as part of the highway. Detailed highway boundary information can be requested from the relevant Host Authority's Highways Records Team but may also require consultation with the Archaeology Officer regarding removal of non-designated hedgerows. 4. Accesses SA14 and SA15: a) Observed vehicle speeds are indicated at 41.4 mph 85%ile speeds. As this is above the MfS threshold of 37mph this would require to be derived from DMRB not MfS criterion. Correct splays need to be 109m not the indicated 69m. Promotor to amend plans of the visibility splays in these locations and supply locations of speed surveys and data. b) The visibility splay shown for Access SA14 appears to extend outside of the highway. It is shown cutting into a hedgerow. Hedgerows are not considered to form part of the highway and would typically be a boundary feature. There is evidence to suggest the hedgerows in this location is not the boundary, as it is situated at the rear of a ditch that runs along Moor Road. The highway only extends to the top of the carriageway-side slope into the ditch and therefore the proposed visibility line extends outside the highway. 5. Access SA13: a) Access is indicated within document PIER Fig 2-5 'Proposed site access', however there are no details of traffic movements associated with this access. Movements along Moore Road for construction as indicated previously, it is not of nature suitable to carry construction vehicles without mitigation. Details of any traffic movements associated with this access should be provided during and after construction. b) Visibility splays do not appear to have been supplied for this access point. Proposals for this access point to be clarified. Promotor to note that there are physical features in this location that might cause the legal extent of the highway to be questioned. 6. Access SA12:

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	a) Access visibility looks to be in accordance with recorded speeds, supply locations of speed surveys and data. Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used to be provided. It is noted that no traffic is indicated to be going into or coming from Great Staughton (this should be expressly confirmed). b) Following the inclusion of access SA12 as a construction route into and from sites A and B, it requires the use of both Great Staughton Road from the Zantra access to the West and Spring Hill Road. Details of the visibility splays at the junction of Spring Hill Road should be provided and the details of the geometry of this junction along with tracking to ensure it is suitable for two-way simultaneous movements of the largest vehicles likely to use this junction. Tracking should also be supplied from the Zantra access (SA12) to the accesses SA10 and SA11 on Spring Hill for largest vehicles likely to use this road simultaneously to ensure it is suitable. 7. Option: similar to Moor Road, the Promotor should be invited to clarify why it is necessary to use this element of public highway (Great Staughton Road/Spring Hill?) when the access to SA11 could be routed similarly internally removing any issues with construction and staff vehicles using the public highway? It is noted that the access track/ cable route adjoins site C, South of the Zantra access. CCC can see no benefit in using the public highway when a further access track adjacent the route of the cable would remove many issues. 8. Accesses SA10 & SA11: a) Northern Junction splays indicated at 2.4m x 103m based on 39.9mph recorded speeds which is acceptable. Promotor to supply speed date and location of survey. b) Southern junction splays indicate 2.4m x 119m based on 43.6mph 85%ile recorded speeds which is acceptable. Promotor to supply speed date and location of survey. c) Visibility splays should be checked against highway records to ensure required visibility is achievable within public highway. Any highway boundary data that has previously been supplied by the Host Authority is likely to be indicative in nature. Such data is a digital representation of the legal highway records that has been plotted as accurately as possible against Ordnance Survey mapping. However, owing to the inherent differences in accuracy between OS data and topographic surveys, users of highway boundary data should exercise caution when overlaying this information with topographic or other site survey data. Features on the ground may not be in the same location as those shown on any highway extent plans or data. Physical features present on the ground (such as ditches or embankments etc) will affect

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	the extent of the public highway that exists on the ground. Where there is any doubt as to the physical public highway extent, The Promotor is to contact the relevant Host Authority's Highways Records team for further guidance. 9. The Host Authorities would require access and highway works to be secured using section 278 agreements, with these standard documents being included within the DCO. 10. Chapter 9 Report: a) (Baseline Conditions) §9.6.21: ATC have been undertaken on straight sections of roads only, the only information this will give is the number of vehicles using that part of the road daily. No junction counts have been undertaken. Assessing the number of vehicles using a section of road is meaningless, these do not suffer from capacity issues. Capacity issues happen at junctions. b) §9.6.26: The use of Crash Map is not acceptable as it does not contain the most up to date data. Accident data must be obtained by the Host Authorities, this data will also highlight any cluster sites. c) §9.6.30: It is noted the construction phase will last 30-months. However, the same traffic volume and effect may be generated during any subsequent Operational Phase replacement. d) §9.6.32: The use of TEMPRO is acceptable. e) §9.6.35: The Promotor should check with all Host Authorities regarding any committed development which may impact on the road network and will need address in terms of cumulative impact. f) §9.7.1: HGV should not be driving through Great Staughton, the sites should be connected via haul roads. g) §9.8.4: Trip generation has been calculated by using the Promotors experience, no evidence has been provided to back this up. h) §9.8.6: No details have been provided on how these figures have been calculated. i) §9.8.8: The Promotors assumptions are based on HGV's not entering the site during the network AM/PM peaks. Therefore this would need to be conditioned on any granting of permission. j) §9.8.9: It is noted the Promotor is suggesting 22 HGV movements per day and 88 HGV movements per day for

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
(BBC Review: Highways Officer – Melanie McGuinness)	construction of the access track for the first 12 weeks. k) §9.8.10: In addition to the HGV movements the Promotor is suggesting an additional 854 staff visiting the site per day. The Promotor has assumed staff would car share and is stating a worst-case scenario of 854 two-way staff movements per day. Again, these assumptions have not been backed up by any evidence or data. If there are 854 staff and all drive, then there will be 1,708 two-way vehicle movements per day. Whilst this is unlikely, no justification has been provided on how many staff will car share. l) §9.8.20: A percentage impact assessment is meaningless, it does not show how the network or junctions are currently operating. m) §9.8.22: Cambridgeshire's CC Transport Assessment Requirements requires all junctions which experience more than 30 new movements in either peak to be modelled. 11. In conclusion, against the matters raised above but not limited to, the information submitted to support this PEIR and any future Application as currently presented is below requirement. The proposed trip rates are not evidenced or justified, and a percentage impact assessment does not show how the highway network is currently operating and therefore does not show what impact the development will have on the network. 12. CCC's Highway is unable to support the PEIR and any future Application at this stage. Host Authority response (BBC): 13. BBC have read the Promotor's Chapter 9 (Traffic and Transport) report and broadly support the more detailed comments made by CCC Highways (set out above), noting that similar matters should be assessed regarding the public highways within Bedford Borough Council. 14. The Construction Traffic Management Plan (CTMP) will be the critical mechanism for managing the impact of construction traffic throughout the 30-month Construction Phase (and possibly the Operational Phase – Replacement), and an Outline CTMP has been prepared to support the PEIR. BBC welcomes the opportunity to be involved in the iterations of the CTMP. At an early stage, the monitoring assessment methodology should be established specifically to ensure that responsibilities are clearly allocated across the relevant local planning authorities.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	15. Generally it is noted that, while most of the matters have been set out, these are not necessarily concluded. For example, there may need to be further discussion on the details of the visibility splays at the numerous site access points, temporary signage and traffic signals, etc, but it is assuming that the Promotor will be picked up such matters in further conversations with the relevant Host Authority's Highway Officers. 16. It is noted that there appears to be limited information regarding staff travel (Travel Plan) other than a broad assumption that some people would car-share to Site, and that minibuses between sites may be provided. BBC suggest that this is insufficient information. 17. Further, it is noted that the various sites may be under construction over a similar period and this would suggest that there may be on-site, off-site travel, and construction movement between the sites which appears not to have been addressed by the Promotor. 18. In conclusion, BBC's Highways would require more clarity from the Promotor against collective highway's matters raised prior to been in a position to support the PEIR and any future Application at this stage.
PEIR Chapter 10 Noise and Vibration (HuntsDC Review: Environmental Protection Officer – Aaron Morley) (BBC Review: Housing and Pollution – Neil Polden)	Host Authority response (CCC): 1. The Host Authority largely agree with the content of Chapter 10 in relation to noise and vibration. 2. With regards to Table 10.6 'Construction Time Period LOAEL and SOAEL', it would be preferred that the threshold figure be set-out as a single figure rather than a range of dB values; and, to see the assessment against the lowest value. 3. §10.6.15 (Noise limits) identifies the noise limits derivation method as agreed, however, Table 10.18 'NSR Locations' lists the 'Baseline Noise Location and Background dB' as a range of dB values. It would be preferred to use the single lowest value rather than the highest value when transposing to Table 10.29 'NSR Noise Limits'. Host Authority response (BBC): 4. BBC are support of the detailed comments made by CCC (set out above). 5. In respect of the predicted night-time contribution (night-time 23:00 – 05:00 & sunrise night-time 05:00 – 07:00) further

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	justification is required to explain why character correction for site noise should be excluded. 6. The Promotor notes that tonality correction should not be applied in terms of tonality from transformers or fan assisted cooling systems, given the separation distance to noise sensitive receptor (NSR). It states that predicted noise levels which are relatively low at NSR and the existing residual sound levels at NSR being much higher (to provide effective masking) any tonal noise is not predicted to be perceptible at the NSR and therefore a tonal character penalty would not be required. BBC do not consider that sufficient justification has been given noting that a tonal sound may be audible if distinctive from the existing residual sound and what components of sound form that residual sound environment. BBC assume form locality that distance road traffic may be present as well as biphonic environmental sound, e.g. birdsong. However plant noise which will be electrical in nature may emit prominent low frequency sound resulting in a distinctive hum and so is in contrast to the residual sound environment. 7. Similarly, BBC would query whether equipment would have potential to emit any pulsing sound and further subjective description around plant and equipment would be advantageous in supporting the conclusion that adverse impact from this development would be unlikely. 8. BBC would advise that if the site is likely to be associated with emission of low frequency sound which is outside the scope of BS 4142, then additional assessment for low frequency noise (LFN) needs to be considered and scoped out if not relevant. 9. BBC acknowledge that BS 4142 does specify that where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night. This appears to have been agreed in methodology with South Cambridgeshire DC, but no record of this being agreed with BBC. 10. BS 4142 does not define low in the context of background or rating levels and so the assessor should make a judgement and justify where appropriate, for example where sound is regarded as steady and continuous (benign) and absent any correction for character then absolute levels may be relevant. The report does propose a criteria based on emergence above background or absolute levels based on background. 11. Based on predicted levels, BBC would agree with the current assessment of adverse impact being unlikely or negligible, subject to additional detail around character correction and absence of any low frequency components.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	f) Development of a proposed dust monitoring plan for during the Construction Phase; and, BBC would expect these to be reviewed and approved by the relevant body prior to permission being granted. 7. Notwithstanding the comment made by the Promotor regarding '<i>very low potential for significant environmental effect on air quality to occur in the operational phase</i>' it is specifically noted that, while BESS fires are rare, should they occur they can have a significant effect on the public health of the surrounding community in terms of release of toxic fumes into the air for a prolonged period of time; and, that if contaminated firewater is not managed on-site this could affect receiving water courses and groundwater to the long-term detriment of the environmental. It is therefore noted that this low probability/ significant effect should be addressed in the Promotor's submission.
PEIR Chapter 12 Ground Conditions (HuntsDC Review: Environmental Protection Officer – Aaron Morley) (BBC Review: Environmental Health Officer – Vicky Persen)	The Host Authority acknowledge that there may be isolated areas of made ground which will be investigated further by the Promotor in line with the Environment Agency guidance, Land Contamination Risk Management (LCRM). Contaminated Land In terms of the following material submitted by the Promotor as part of the PEIR, namely: a) Preliminary Environmental Information Report Volume 4 – Non-Technical Summary (September 2024); b) Phase 1 Geo-Environmental Assessment (Smith Grant Environmental Consultants, Ref: R3053; dated August 2024); and, c) Preliminary Environmental Information Report Volume 1 – Main Report Chapter 11: Air Quality (September 2024) and associated appendices, BBC raise no significant matters of concern or objection. The Development is not for a sensitive land use. Any Works carried out on Site should be done in line with a) remediation as proposed; b) verification resulting from the findings of site investigation; c) the conclusions and recommendations of the submitted reports; and, d) signed off by the relevant statutory body, so as to ensure that the Site is deemed safe and suitable for its intended use.
PEIR Chapter 13 Land and Soils (BBC Review: Planning Case Officer - Peter Dijkhuis)	§13.1.2 It is noted that '<i>a detailed agricultural land classification is currently being undertaken across the Site, and this Chapter therefore presents a preliminary assessment of the likely impacts and effects of the Scheme</i>'. Consequently, the Host Authorities reserves the right to comment on this chapter aspect through technical working groups and future consultation. Table 13.1 (National Policy Statement EN-1; Paragraph 5.11.14) indicates that '<i>Promotors are encouraged to develop and implement a Soil</i>

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	<i>Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination', or lie dormant for 40-years;</i> (NPS EN-3; Paragraph 2.10.33) '<i>...accordance with the grading criteria and identify the soil types to inform soil management at the construction, operation and decommissioning phases</i>'; (NPS EN-3; Paragraph 2.10.81) '<i>...to minimise soil damage and to provide optimal conditions for site restoration</i>'; It would be a requirement that an outline Soil Management Plan is prepared to address the above matters and submitted as part of any future planning application coming forward. It is noted by the Promotor in Table 13.6 Natural England – response to consultation, that an SMP will be submitted. With reference to PEIR Table 13.2, the Bedford Local Plan 2030, Policy 56 (as shown on Figure 13) sets out broad locations where solar farms will be acceptable in relation to agricultural land – Grade 1 and 2 (Best and Most Versatile Agricultural Land). A more detailed soil classification is presented by the Promotor in Table 13.7 indicating that BMV soils comprise Grade 2 (20.5%), Grade 3a (43.0%), and Ungraded (assumed Grade 2)(11.5%). Total BMV = 75.9%. It is noted that the Host Authorities do not have a full complement of in-house technical disciplines to respond to such a complex PEIR and future Application and are engaged with the Promotor through a Planning Performance Agreement (PPA) in instructing an External Consultant with the necessary technical disciplines to respond, but this Agreement has not yet been concluded between Parties. The Host Authority reserves the right to comment on this chapter aspect through technical working groups and future consultation.
PEIR Chapter 14 Socio Economics, Land Use and Tourism (BBC Review: Planning Case	It is noted that the Host Authorities do not have a full complement of in-house technical disciplines to respond to such a complex Application and are engaged with the Promotor through a Planning Performance Agreement (PPA) in instructing an External Consultant with the necessary technical disciplines to respond, but this Agreement has not yet been concluded between Parties. The Host Authorities reserves the right to comment on this chapter aspect through technical working groups and future consultation.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
Officer - Peter Dijkhuis)	
PEIR Chapter 15: Climate Change (CCC Review: EnvCase Officer)	Host Authority response (CCC): Carbon emissions: 1. The Host Authority agree that, for the purpose of the greenhouse gas (GHG) emissions assessment, it is reasonable to assume that the baseline GHG emissions for the Site, without the proposed development, would be zero (§15.6.9). 2. (Table 15.12) The GHG emissions from the Construction Phase (2027 to 2030) are estimated at 330,882 tCO₂e; emissions during the Operational Phase (from 2030 to 2070) are estimated to be 282,378 tCO₂e; and, 6,736 tCO₂e for Decommissioning Phase. The total project lifetime emissions are therefore estimated by the Promotor at 619,996 tCO₂e; a very large source of emissions. The vast majority of these GHG emissions in all phases are from embodied carbon in the equipment and materials – from raw materials extraction and manufacturing. 3. It is helpful to consider the local carbon budgets in §15.6.15 and §15.8.10 as well as the national carbon budgets. Overall the Development is a small proportion of local carbon budgets, except for the Decommissioning Phase. 4. Whilst it is true that the purpose of solar schemes such as this one is to displace fossil fuel electricity generation, it is helpful to recognise that the UK grid mix will change over time, therefore it is welcomed that sensitivity analysis has considered other comparators. It cannot be assumed that the Development will only ever displace gas-fired power stations, for its entire lifetime. 5. For most types of developments, it is suggested that the long-run marginal emissions factors from DESNZ's Green Book supplementary guidance are the most appropriate comparator (§15.8.16). However, it is recognised that the forecast grid decarbonisation over time will only occur if more renewables projects are implemented. This results in a 'Catch-22' situation for the purposes of assessing GHG emissions from such Development. 6. It is noted that the Development is expected to produce 15,980,748 MWh electricity for export to the national grid over its 40-year lifetime (assuming current technology).

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
(BBC Review: Planning Case Officer - Peter Dijkhuis)	7. The lifetime carbon intensity (38.8gCO₂e/kWh) is also a useful figure, and the Host Authorities recognise that this is far lower than most other forms of electricity generation, other than wind (Table 15.18). 8. Overall, the Host Authorities would agree that the Development is likely to have a significant beneficial effect on GHG emissions. 9. However, the Host Authorities would disagree with the statement that 'no additional mitigation is required'. Steps should be taken to minimise the GHG emissions, especially from embodied carbon, through the detailed design process. Host Authority response (BBC): 10. In terms of GHG emissions, it is noted that: a) The figures tabled excludes the Operational Phase – Replacement activity which could generate a similar GHG emission as that of the Construction Phase. b) §15.4.3 The GHG emissions in all phases are from embodied carbon in the equipment and materials – from raw materials extraction and manufacturing. The Promotor notes that this includes the manufacture of solar arrays and BESS batteries overseas and then the international and national logistics to bring such completed elements to site during the Construction Phase. This is noted as a 'conservative estimate'. BBC note that these figures do not include the Operational Phase – Replacement of such elements (refer to Table 15.6 in this regard). c) BBC are not in agreement that Table 15.6 '<i>Transportation and disposal of waste materials</i>' is not scoped in in all phases (refer to PINS comments in Table 15.7 (8)). d) §15.4.6 '<i>Emissions from the decommissioning process at the end of the design life are very difficult to estimate due to the substantial uncertainty surrounding decommissioning methodologies and approaches so far into the future. It has been assumed that the resources and effort required for decommissioning will be equivalent to those required for construction</i>'. It is suggested that the related GHG emissions figures for these two Phase as tabled are not reflective of this statement (Table 15.12) or requires clarification. e) BBC would suggest that the Promotor models the volume of toxic fumes created by a potential BESS fire as a worst-case scenario in terms of GHG emissions.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
PEIR Chapter 16: Other Environmental Topics (HuntsDC Review: Environmental Protection Officer – Aaron Morley) (BBC Review: Planning Case Officer - Peter Dijkhuis)	1. <u>Environmental Management Plans</u>: the outline cEMP, oEMP and dEMP are acceptable and it is understood that more detailed versions will be prepared by the Promotor as part of the DCO planning application (Ref: Preliminary Environmental Information Report - Volume 2: Technical Appendices. Appendices 2-3, 4 and 5: Outline Construction, Operational and Decommissioning Environmental Management Plan). 2. <u>Waste</u>: (§16.3.27) <i>'PV panels would be dismantled and the panels separated into their component parts to allow the constituent elements to be recycled. At the point of decommissioning, all of the panels would be removed to a PV panel recycling facility. The resource value of the various components of the panels, along with the legislative requirements of the waste management regime, mean that the vast majority of the PV infrastructure would be recycled'</i>. Further to that raise elsewhere in this response relating to replacement of PV panels and batteries during the Operational Phase, this strategy needs more clarity/ conviction. Currently, a potential significant contribution to the waste of this Development is too generically worded. 3. <u>Major Accidents and Disasters</u>: (§16.4.16) <i>'An Outline Battery Safety Management Plan (oBSMP) will be prepared and submitted with the application for development consent, with compliance secured by a requirement of the DCO. The oBSMP will detail the regulatory guidance reviewed to ensure that all safety concerns around the BESS element of the Scheme are addressed so far as is reasonably practicable such that likely significant effects would not arise'</i>. It is noted that: a) The National Fire Chiefs Council have issued a Guidance note but this carries no weight in law or planning; further the Fire Officers have stated that they have no authority to approve/ endorse any Battery Safety Management Plan or similar. While the Host Authority and the Fire Officers welcomes the proposal to prepare an oBSMP and compliance secured through a requirement in the DCO neither have the authority to approve such a Plan. Consequently, all risk remains with the Promotor/ Developer. b) <i>'reasonably practicable'</i>, with regards to public health and safety, while a BESS fire is considered rare, its severity is considered significant. In light of the fact that the Promotor's BESS facility will be located 3.6km or 5km west of St Neots, a large urban settlement, greater clarity and commitment should be set-out by the Promotor in terms of wind-borne fire/ lithium particles.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	c) This should be read against §16.1.1 (Human Health; Major Accidents and Disasters) and §16.1.2 <i>'For each of these environmental topics, significant effects were not predicted at the EIA Scoping stage and the Planning Inspectorate confirmed that individual assessment chapters are not required. The purpose of this chapter is to present an overview of the likely impacts of the Scheme to confirm that effects would not be significant in EIA terms'</i>. The Host Authority's concerns are raised in this regard. 4. <u>Fire/ Risk Management Plan:</u> a) The Institute of Environmental Management and Assessment defines major accident and/or risk as <i>'Events that threaten immediate or delayed serious environmental effects to human health, welfare and / or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g. train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events'</i>. This should be read alongside the Chief Fire Officer's Guidelines. It is therefore incumbent on the Promotor to prepare a management plan relating to BESS fire risk, in consultation with the relevant Fire and Safety authorities. b) While it is acknowledged that battery/ BESS fires are considered by the industry as rare, their occurrence should they occur should be seen as severe in terms of their impact on human health and potential environmental damage. This needs address. c) While not a planning matter, this risk, and related insurance, should be stated as solely the responsibility of the Promotor/ Developer for the duration of the Development. 5. <u>Hedgerow Regulations:</u> the Promotor's attention is drawn to a) the Pre-Parliament Inclosure Act (1845) and Hedgerow Regulations 1997 Schedule 1 Part 2 where some of the hedgerows within the Site and surrounding area may consequently be defined a non-designated asset; and, b) NPPF §209 <i>'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'</i>. The Promotor should give due regard and attain consent from the Host Authority prior to works been undertaken.

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
	regarding matters raised. 7. The Promotor is referred to the British Horse Society's Scoping Opinion response (dated 14 November 2023), which addresses the issue of Public Rights of Way (PRoW) used as footpaths and bridleways and proposed corridor widths. Their response remains on file, submitted by independent cover. 8. The impact on any PRoW is a material planning consideration. This is set out in the various Local Plans (and national policy) which supports the protection/safeguarding of rights of ways of the various routes affected by the proposal as identified in the East Park Energy report. In this regard, the Promotor is referred to the BBC Local Plan 2030 Policy 91 (Access to the countryside). 9. The Host Authority has a statutory duty in respect of PRoWs and will ensure that members of the public are not inconvenienced in their use of PROW. Therefore, where works are required within/ across PRoW, for example where construction access or cable routes utilise or cross PRoWs, then prior notice to the commencement of Development, a condition survey shall be submitted to and approved by the relevant Host Authority. During the Construction Phase, and possibly the Operational Phase – Replacement, temporary closures will be required for each route that is affected. 10. Details of reinstatement, enhancement, new routes to PRoW, not limited the restoration of paths to an acceptable condition and including hedgerow planting if applicable, must be approved by the relevant local planning authority. Details should be provide regarding the proposed permissive paths which should be multiuse routes suitable for walkers, cyclists and equestrians. Routes should improve connectivity and provide recreational enhancement for users. 11. There must be no adverse effect on public enjoyment as a result of the Development, and therefore any possible loss of visual amenity on any of the PRoW routes must be fully considered. Details of maintenance management for hedgerows and additional landscape planting along buffer routes and green lane corridors should be included in the PRoW management plan.
PEIR Chapter 17: Cumulative Effects	§17.1.5/6 The Host Authority supports the long and short list of 'Other Development', and Figure 17.1 Long List of Cumulative Schemes. BBC are broadly supportive of this list but suggest that this should include Major Development sites in current discussion that may come forward during the DCO process. Of immediate address is:

PIER Chapter (Technical discipline)	Response (Matter's raised) § - paragraph
(BBC Review: Planning Case Officer - Peter Dijkhuis)	a) EN010170 Green Hill Solar Farm: consists of an electricity generating station with a capacity of up to 500 megawatts (MW) comprising of ground mounted solar arrays and associated development including energy storage, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance of the scheme. The sites and cable route search area are situated in an area of countryside within the administrative boundaries of North Northamptonshire, West Northamptonshire and Milton Keynes Councils, located between the towns of Northampton, Wellingborough and Bedford. The sites cover an area of approximately 1,194.8 hectares (ha) excluding the cable route search area and cable corridor(s). b) (Table 17.5) Tier 3 sites with specific regard to BBC's emerging Local Plan. c) It is noted that there are a number of consented and proposed solar developments in the area, as well as a battery energy storage system with permission next to the Eaton Socon Substation. Therefore the impacts associated with such infrastructure need to be considered in terms of cumulative effect. §17.4.4 In light of comments made by BBC in the Scoping Report regarding cumulative Zone of Influence (ZoI), BBC are supportive of this statement <i>'The largest ZoI is 10km and that has been used in the establishment of a Long List of 'other developments'</i>.
PEIR Chapter 18: Summary of Effects	No comment in this regard at this stage.

