Appendix 2 – Cambridgeshire County Council's response to Statutory Consultation 2024

Our Reference: EPE–StatCon-291024

East Park Energy: Comments on the promoter's Statutory Consultation

This document sets out the comments by Cambridgeshire County Council (**the Council**) regarding Brockwell Storage and Solar 's Statutory Consultation for the East Park Energy proposals.

Please note each of the three Host Authorities - Cambridgeshire County Council, Huntingdonshire District Council, and Bedford Borough Council are responding separately. The authorities continue to work closely together and co-ordinate efforts to respond to this scheme. To aid reading the response to the statutory consultation, the three local planning authorities have adopted a similar template in addressing the chapters set out in the promoter's PEIR. The promoter has engaged in seeking pre application advice with the Host Authorities collectively and consequently there may be a similarity of response to matters across technical disciplines.

The following table contains comments to chapters of the PEIR and across a number of technical specialisms.

Topic areas and Specialism	Proposal aspect referred to	Comments
Introduction	PEIR Chapter 1	1.1.2 '*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*'. This statement is noted, and Cambridgeshire County Council reserves the right to comment further on matters as they arise and to material submitted by the promoter in any future Application made. Further, in this regard, it is noted the Council reserves the right to comment further through technical working groups and future consultation. The Host Authorities are engaged with the promoter to conclude a Planning Performance Agreement (PPA) to allow for the instruction of external consultants where authorities do not have the expertise in-house.

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		1.2.3 Whilst it is outlined there being a construction phase, operational phase and a decommissioning phase, Cambridgeshire County Council queries if there are further phases for the replacement of photovoltaic panels and batteries over the course of the 40 years, understanding both technologies are not anticipated to have a productive lifespan for such a time. (PEIR Chapter 2, Table 2-35 'Indicative Operational Lifespan of Scheme Components' indicates 20-40 year lifespan for such components which we do not consider an adequate description and needs to be supported by evidence.) Currently the PIER does not consider replacement of such infrastructure and the associated impacts. We would welcome further discussion with the promoter and how this can be captured and assessed as part of the Environmental Statement and mitigation measures captured in relevant management plans.
The Scheme	PEIR Chapter 2	<u>Specific comments on the PEIR</u> 2.3.2 – We welcome the acknowledgement 'The technology associated with solar development is advancing rapidly,…'. This brings with it uncertainty and unproven assumptions that need to be reflected in the Environmental Impact Assessment. In particular related to the replacement of equipment (as mentioned above), the recycling of Solar panels and batteries, as well as the decommissioning of a solar site and re-establishing arable land. 2.4.12 – Final design principle - whether or not the approach to archaeological mitigation in the final Design Principle is supported depends entirely on the nature of the archaeology in that area (following evaluation). 2.4.17 – In order to determine the potential impact on archaeology, what would the density of the inverters be among the solar arrays (i.e. how many of them will be needed per hectare)? 2.4.26 – In order to determine the potential impact on archaeology, what would the density of the transformers be? 2.4.30 & 2.4.63 – Battery Storage Energy System – Either option to location BESS in site C or D have potentially major impacts. Whilst locating BESS at Site D would avoid the known archaeology in site C, it is worth noting Site D is pending trial trenching.

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		2.4.58 Further detail is required relating to the management of polluted water including in the event there is an emergency situation such as a fire. 2.4.60 The decommissioning of the BESS site needs to include the removal of all infrastructure, including underground, in order to avoid long term leaching and to enable the return of the land to agricultural use. 2.5.4 (xi) (Construction of East Park Sites A, B C and D (Months 2 to 30)): (m) 'Establishment of soft landscaping in areas of habitat mitigation'. We would seek soft landscaping works are implemented within the first year of construction, to then enable a two-year establishment and replacement review with potential remediation strategy. 2.5.5 and 2.5.14 The promoter 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 Replacement Phase. §2.6.2 'three FTE roles working in land management including landscape maintenance and agriculture'. We welcome the promoter's commitment to appointing this workforce to manage the landscape and habitat for the duration of the Development and we would like to see these roles set out specifically as part of both the Construction Environment Management Plan and the Landscape and Ecological Management Plan. §2.7.1 We note it is describe as part of the Decommissioning Phase 'Any infrastructure that is more than 1m below ground level, such as cable conduit and casing, would be left in situ. The principle approach ought to be to seek to recycle as much as is possible and that includes that underground, and to remove all that may cause contamination. We note the promoter commits to returning the site to a condition suitable for its original use, however we would encourage to extend this to 'no less quality than the original use'. Assessment of the soil quality is needed for the duration of the scheme.
Alternatives and design evaluation	PEIR Chapter 3	The Council reserves the right to comment on this subject through technical working groups and future consultation.
EIA Methodology	PEIR Chapter 4	Please see comments related to each chapter.

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Landscape and Visual	PEIR Chapter 5	By virtue of the scale of the proposals, there will be substantial residual landscape character and visual impacts that cannot be mitigated. There are concerns about the visual impact on PROWs. This includes the different users of the network including equestrians. (See PROW comments on page 28.) The Council reserves the right to comment on this subject through technical working groups and future consultation. The Host Authorities do not have the expertise in landscape and visual impact to comment in detail at this time and are engaged with the promoter to conclude a Planning Performance Agreement (PPA) to instruct an External Consultant with the necessary technical disciplines to respond.
Cultural Heritage and Archaeology	PEIR Chapter 6	The promoter and archaeological agents have consulted extensively with Cambridgeshire County Council's Cambridgeshire Historic Environment Team (CHET) regarding the level of information needed to support DCO submission, along with the broad approach to archaeological evaluation and mitigation at the proposed East Park Energy development. In particular CHET supports removing the area of the (now scheduled) Roman town in Site C from development, and arable agriculture, and reverting it to meadow. The promoter has thus far acted in the best interests of the historic environment with regard to this area. Please note these comments are restricted (in so far as is appropriate) to Sites C, D, and areas of cabling within Cambridgeshire/Huntingdonshire. The DCO application should be supported by appropriate archaeological information. In this case that is geophysical survey followed by trial trenching of a scale agreed with stakeholders. Trial trenching is currently ongoing across Sites A to D in accordance with a brief set by CHET and Bedford Borough Historic Environment Team (BBHET). Geophysical survey is proposed for the cable routes linking sites B and C, sites C and D, and site D to the grid connection, but note trial trenching is not clearly proposed. It is CHET's position that there are areas (particularly between site C and D) where national significant archaeology may be present, and that some level of intrusive trenching is needed to inform the DCO. Three approaches to mitigating areas of significant archaeology are proposed, as per PEIR para 6.9.4 – the utility of each of these techniques depends on the nature, depth and significance of

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		archaeological remains in a given area, and the potential impact on those remains. One particular technique appears to be preferred in the non-specialist parts of the PEIR (e.g. para 2.4.12), however this technique (mounting of panels on concrete slabs/shoes) is only appropriate in certain circumstances, and only given further information regarding related impacts (e.g. cabling, inverters, transformers, access roads) in those areas. It is noted a Decommissioning Environmental Management Plan (DEMP) is proposed for submission. However, the Outline DEMP provided here (Appendix 2-5), and paras. 2.7.5 and 6.8.61 of the PEIR, state that decommissioning impacts are 'assumed' to be less than or no more extensive than construction. This assumption does not provide reassurance of the potential impact of removing piles or below ground cabling in the future. Appropriate detail needs to be included in the DEMP to fully assess the potential impact of decommissioning on below ground archaeological remains. Opinions are sought on whether the BESS and substation should be within Site C or D. The potential for significant archaeological remains is considerably higher within Site C, and we would provisionally recommend Site D. This may change pending the results of ongoing trial trenching, however. A cable route is proposed to cross the newly scheduled Roman town. It would be greatly preferable to re-route this, away from the nationally significant archaeology. I'm aware that this will be drilled at considerable depth, and therefore unlikely to have significant physical impact on the monument, but to fully judge its appropriateness or otherwise further information regarding the technique and depth is needed. Equally, a temporary access road is proposed to cross the scheduled monument. While the information provided suggest that there will be zero below ground impact, more information is needed on what damage might be caused by compression from a volume of heavy vehicles using this road. Specific comments on the PEIR: 6.4.6 – It is stated that trial trenching for the grid connections will follow 'in due course' Cambridgeshire Conty Council would like further engagement with the promoter as to the timescale for this to ensure the information is available at the appropriate stage of planning?

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		6.6.32 – Cambridgeshire County Council has concerns that the potential for nationally significant Roman remains associated with the Roman town is not appropriately assessed for the cable corridor from Site C to D which has high potential for schedulable remains. 6.7.8 - The appropriateness of the techniques in PEIR Volume 3 Figure 2-3a depends entirely on the depth, nature, and significance of the archaeological remains within the Area of Archaeological Constraint (AAC). Other potential mitigation measures include removing it entirely from development or mitigation by record via archaeological excavation. We do not support 'non-intrusive' construction techniques as the only mitigation. The impact of cabling, inverters, transformers, access tracks within AACs should be considered. 6.7.13 – The temporary access track across the scheduled monument will have to have absolutely no below ground impact and will need permission from Historic England. 6.7.14 – is there an indicative depth that is considered appropriate for directional drilling beneath the Scheduled Monument? The full depth of the remains within the town was only determined within the easternmost trench in the targeted evaluation and is closest to the proposed cable route. Table 6.11 Likely Direct Effects within Site C – Whilst broadly agreeing with the assessment of impact and significance of impact in the table, the full significance of impact is pending results of the ongoing trial trenching. 6.8.28 –Intrusive evaluation is also strongly recommended within the Site C to Site D corridor. Table 6.13 Likely Direct Effects within Site D – Broadly in agreement. 6.8.35 – Areas of Archaeological Constraint are proposed to be identified post-determination. Cambridgeshire County Council would like to see potential EIA-significant impacts identified pre-determination? Table 6.14 – It is noted the first six items in this table, and the last, could involve impacts that are significant in EIA terms, pending evaluation. 6.8.61 - The extent of Areas of Archaeological Constraint (AACs) will depend on likely below impact within areas proposed for piled solar arrays. This includes the extent and magnitude of

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		impact proposed during decommissioning. Detail regarding the removal of piling and other below ground infrastructure should be within the DEMP accompanying the application, because there is no guarantee that this would not exceed the impact of their installation/construction. 6.9.4 – Agreed. 6.10.1 – Agreed. 6.10.7 – More information is needed regarding decommissioning impacts here. 6.11.11 - There are potential areas of significant archaeological impact along the proposed cable routes - these should be trenched to inform the application. If cable routes are not to be trenched the reason for this will require considerable support in the application documentation.
	Outline Construction Environmental Management Plan (Appendix 2-3)	2.5.8 & 2.5.9 – Construction compounds will have a major impact on any below ground archaeological remains in the area. 3.1.1 Cambridgeshire County Council supports the provision of an Archaeological Clerk of Works during operation. Table 5.2 : Summary of the construction mitigation and management measures – Cultural Heritage – Cambridgeshire County Council recommends that Archaeological Management Plans (AMPs) are provided for areas to be preserved in situ, while Written Scheme of Investigation (WSIs) are used for those areas where archaeological investigation is needed. The OCEMP has a clear preference for preservation in situ via the foundation design proposed in PEIR Vol 3 Fig 2-3a. We only support this in certain circumstances, and the other mitigation options listed in PEIR para 6.9.4 are very likely to be needed.
	Outline Decommissioning Environmental Management Plan (ODEMP) (Appendix 2-5)	2.4.4 – How will piles be removed? Incorrect removal could conceivably have major impact on archaeological remains. 2.4.5 – How will care be taken not to impact on archaeology. Measures to mitigate the risk of damage needs to be included in the DEMP.

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		Table 5.2 – It is noted that careful removal of infrastructure within Areas of Archaeological Constraint (AACs) is proposed. Details of how this will be monitored, for example by the Archaeological Clerk of Works, would be welcome. Furthermore, details for areas outside AACs? If decommissioning is likely to cause major below ground impacts even in areas not originally proposed to be AACs, then the boundaries to AACs may have to take in more marginally significant archaeology.
Ecology and Natural Conservation	PEIR Chapter 7	The Council is concerned that ecological features have been prematurely scoped-out prior to the completion of adequate baseline survey work, including habitat and botanical surveys and protected species surveys (bat roosts, Great Crested Newt, water vole, otter, reptiles and wintering birds), as well as arboricultural impact assessment. Furthermore, it is not possible to determine the level of impact of the scheme on these habitats / species. The Council is concerned that the assessment doesn’t adequately consider the potential impact on wildlife sites, protected / priority species or habitats. Or particular concern is the impact of solar panels and the BESS (noise pollution) on bird and invertebrates, including invertebrates found in Moor Road Marshy Fields CWS and designatory species of Grafham Water SSSI. As well as Impact of cabling route, including hydrological impacts, on Huntingdon Wood County Wildlife Site / ancient woodland and pond and ancient woodland County Wildlife The site has the potential to support breeding bird assemblage of county importance. We are concerned there will be an adverse impact on nesting habitat for ground nesting birds (supports 104 breeding pairs of skylark), as a result of displacement from fields with solar arrays, and consider this to be a significant impact. The scheme must be redesigned to fully compensate for this impact, through removal of solar panels, better proposed management of land for these birds, or expansion of red-line boundary to include habitat to accommodate these birds. If this is not possible, then any residual effect should be resolved through the development of a comprehensive off-site compensatory farmland bird scheme, secured through Section 106. More detailed comments below:

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		Section 7.2 - the Huntingdonshire Priority Natural Landscapes document is currently going through approval stages at Huntingdonshire District Council (see https://democracy.huntingdonshire.gov.uk/moderngov/ieDecisionDetails.aspx?AIId=59563). If approved, it will set out nature conservation prioritised within Huntingdonshire and should be considered as part of any planning application. Please consult Huntingdonshire District Council for further information. Table 7.5 – the council does not agree that the following ecological features should be scoped out at this stage: - Grafham Water SSSI, given the potential for designatory species (wetland birds) to be affected by solar panels - irreplaceable habitats - roosting bats, given that an arboricultural impact assessment has not been completed - notable flora at this stage, given that no detailed botanical surveys have been completed, particularly for arable margins, other neutral grassland and woodland (PEIR Figure 7-3 Habitat Survey). It is considered that an initial habitat survey does not provide an accurate assessment of the importance of a site for arable flora, particularly given their abundance can vary between season / years. 7.6.27 - the importance of the site for breeding birds had not been adequately considered. The site has the potential to support breeding birds of county importance (Criteria 9bi, Cambridgeshire & Peterborough County Wildlife Site Selection Criteria 2023– Version 7.3). 7.6.35 - no consideration is given to the implications for incomplete wintering birds surveys that were undertaken, with no surveys completed in October. The Council would expect a fully survey season to have been completed. 7.6.38 - the Councils expects detailed surveys be completed for trees identified as “possessing potential roost features (PRF) of up to PRF-M” within the site, as well as any trees within close proximity to the site. 7.6.45 - the Council is concerned that comprehensive surveys of ponds for Great Crested Newts has not been completed, including lack of surveys of pond (P43) located within the Application

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		site. Details surveys must be completed on all three ponds identified on-site and the 23 ponds identified within 250m of the Application site. 7.6.49 - it is unclear why reptiles surveys have not been completed, given the presence of suitable habitat, including ‘other neutral grassland’ within Site C (PEIR Figure 7-3 Habitat Survey). 7.6.52 & 7.6.54 - it is unclear why detailed water vole and otter surveys have not been completed, particularly where the scheme will impact watercourses and adjacent habitat, and potentially pond P43. It will be important to confirm whether there will be any impacts because currently, there is no proposal within the Outline Landscape and Ecological Management Plan (OLEMP) to provide watercourses enhancement and as such, no scope to mitigate losses of water vole / otter habitat. 7.6.54 - it is unclear why detailed water vole surveys have not been completed, particularly where the scheme will impact watercourses and potentially pond P43. It will be important to confirm whether there will be any impacts because currently, there is no proposal within the OLEMP to provide watercourses enhancement and as such, no scope to mitigate losses of water vole habitat. 7.6.60 - there no recorded white-clawed crayfish records. However, occasionally small remnant populations have been found. We are therefore unclear why eDNA surveys were not completed to confirm their absence. 7.6.62 - given the present of notable flora records within woodland on Site C, we expect detailed botanical surveys to be completed to confirm its current condition and identify opportunities for enhancement. 7.8.15 - insufficient evidence has been provided to demonstrate that the scheme will have no impact on Huntingdon Wood CWS. We note that a 15m buffer zone is shown on the Figure 2-2 Illustrative Environmental Masterplan. However, no consideration has been undertaken as to the hydrological impact of digging a trench onto the underlying ground water etc. and the impacts that could have on the woodland.

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		7.8.26 - no consideration has been given to direct or indirect impact of installation of the cabling route on pond P43, particularly any hydrological impact. 7.8.57 - it is disappointing that no consideration has been given to the usage of the site by otters beyond 8m of the watercourses. Further survey work is required to identify potential locations of couches, lay-ups etc that should be excluded. 7.8.80 - no consideration is given the impact of noise pollution from the BESS on barbastelle bats 7.8.92 - The Council requires further evidence to demonstrate how the scheme will mitigation impacts to displacement of ground nesting birds, particularly those associated with nesting in open habitats (e.g. skylarks) because we cannot fin how large areas of open grassland will be managed for "*to be of benefit for skylark and lapwing and to encourage nesting attempts within these areas"* within the OLEMP. The OLEMP states that the aim of 'Proposed Grazing Pasture or Neutral Grassland' will be grazed pasture with *"suitable foraging (and potentially breeding) habitat for grassland birds such as skylark"*, however, these areas are proposed within solar arrays and therefore unsuitable as nesting habitat for skylarks. While the 'Proposed Diverse-Species Grassland', which will provide large areas of open grassland, are only to be only managed as foraging habitat *(*para 5.2.7 & 5.2.9, Appendix 2-2, OLEMP). We assume management requirements within the Schedule Monument for archaeology may also restrict its ability to support nesting habitat. We therefore require much greater details as to how the habitats will be management and realistically, how many breeding pairs (nest sites) can be achieved within the scheme. Any adverse impacts should be mitigated through creation of additional land for nesting farmland birds within the scheme. Any residual impacts should be addressed through off-site compensation scheme for farmland birds. Paragraph 7.8.96 - the Council agrees that the displacement of ground nesting species as a result of panels will result in an adverse effect to ground nesting birds. However, the magnitude and significance of this impact to have been undervalued.

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		Paragraph 7.8.101 - The impact of noise pollution, as a result of the BESS, on breeding bird should also be considered, particularly if it is to be located immediately adjacent to woodland within Site C. Paragraph 7.8.102 - the impact of noise pollution, as a result of the BESS, on bats should also be considered. Paragraph 7.8.108 - this GCN assessment is based on incomplete survey work. GCN assessment of pond P43 (on-site) and an additional 12 ponds (located within 250m) were not completed due to access restrictions. These must be completed. If not, as a precaution, the issue should be addressed through a District Level License application (if applicable). Paragraph 7.8.115 - given the proposal will result in adverse impacts to (albeit short) sections of in-channel habitat, we would except mitigation to also include enhancement to in-channel & bank side habitat for water vole. Paragraph 7.8.119 - No consideration has been given for adverse impact of solar arrays on the lifecycle of invertebrate species that may lay eggs on the solar panels. Consideration of aquatic invertebrates of the rivers drains, standing water and swamp (e.g. Moor Road Marshy Fields CWS) located within and adjacent to the Application site, particularly species with lifecycles that can be adversely impacted by solar panels. Paragraph 7.8.121 - This assessment is considered inaccurate given that the oDEMP only confirms that woodland and trees will be retained and therefore grassland habitats to be created and managed through the operational stage and recorded as delivering up to moderate beneficial effect (significant) on a range of protected species, including reptiles, amphibians and bats during the operational phase will be lost. Therefore, the decommissioning phase should accurately reflect the loss of these habitats, based on the assumption of their condition to be created within 40 years. The Council is of the view that all habitat that provides significant benefit to protected species and/or delivers priority habitat, or habitat of district/county importance should be retained in perpetuity.

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Ecology and Natural Conservation	PEIR Appendix 7-1: Ecological Baseline Report	The Council is concerned that habitat surveys have not been completed for the entire site. There appears to have been no surveys of the cabling or access routes or around Eaton Socon. In addition, the report doesn't provide description / assessment of all habitats shown on the PEIR Figure 7-3 Habitat Survey, for example other neutral grassland, while the habitat shown in orange is unknown.
Ecology and Natural Conservation	PEIR Appendix 7-3 Wintering Bird Survey Report	Paragraph 2.1.10 - the Council is concerned that comprehensive surveys for wintering bird was not completed
Ecology and Natural Conservation	PEIR Figure 2-2 Illustrative Environmental Masterplan	The Council is concerned that the Illustrative Environmental Masterplan fails to adequately mitigation / compensate for the loss of nesting habitat for ground-nesting birds. The scheme must be redesigned to fully compensate for this impact, through removal of solar panels, better proposed management of land for these birds, or expansion of red-line boundary to include habitat to accommodate these birds. If this is not possible, then any residual effect should be resolved through the development of a comprehensive off-site compensatory farmland bird scheme, secured through Section 106. Pond 43 (Figure 7-7 Location of Ponds) is located along the alignment of the cable route between Site D and Eaton Socon substation. No production measures (e.g. buffer zone) has been identified in the Illustrative Environmental Masterplan (Figure 2-2o). Further evidence is required to demonstrate that the installation of the cable will impact the pond either directly (digging within the pond) or indirectly (affecting hydrology and water quality /quantity) of the hydrology of the pond. It would be helpful to identify the land that will be managed as nesting habitat for farmland birds of open habitat (e.g. skylarks)
Ecology and Natural Conservation	PEIR Figure 7-2 Non-Statutory Designated Sites within 2km	It would be helpful for all wildlife sites to be named - Moor Road Marshy Fields County Wildlife Site located south of site C is not labelled.
Ecology and Natural Conservation	PEIR Figure 7-3 Habitat Survey	We are concerned that Figure 7-3 shows that habitat surveys have not been completed across the entire site (e.g. access and cabling route and Eaton Soton substation). It is unclear what 'solid orange' areas indicate, while pond (P43), watercourse across Site C, woodland / trees in Site D (shown on Google Earth) and hedgerows are not shown.

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		A ‘zoomed in’ version of each site should be provided, so that it’s easier to identify the type and extent of these habitats.
Ecology and Natural Conservation	PEIR Appendix 2-2 Outline Landscape and Ecological Management Plan	The Council welcomes the preparation of the Outline Landscape and Ecological Management Plan, however we are concerned that it doesn’t fully address adverse impact to biodiversity (particularly farmland birds), nor does it propose to enhance all existing habitats (e.g. ditches) present within the Application Site. Further detail is also required to ensure the scheme is resilient to climate change and reflective of local landscape character. The development of the Landscape and Ecological Management Plan and its implementation should be overseen by a steering group, comprising local authority officers (landscape, ecology, archaeology, rights of way etc.) and local interested groups (e.g. Wildlife Trust) and local experts to advise on monitoring and management of the site throughout the 40 years. Funding for this group should be secured as part of this planning application. All compensatory habitat must be created prior to the removal of existing habitats for protected / notable species, for example nesting habitat for ground-nesting birds. More details below 4.2.15 - greater consideration must be given for protection of ground-nesting birds that may nest on areas of bare earth / arable fields during construction phase. 4.2.18 - we are concerned that trees present within the site, which has the potential to be removed as part of the scheme, have not been surveyed to identify them to support roosting bats. 4.2.26 - any works within 10m of the ditch bank should be subject to a pre-construction inspection 4.3.5, 4.3.7, 4.3.13 & 4.3.18 - in Cambridgeshire, we have seen high failure rates of new hedgerows and tree planting as a result of dry conditions. It is important that planting is completed in Oct – Dec, so allow establishment before any dry weather (from spring onwards). Consideration should also be given to usage of cellular rather than bare-root stock.

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		5.5.2, 5.5.13 & 5.5.24 - in Cambridgeshire, we have seen high failure rates of new hedgerows and tree planting as a result of dry conditions. A comprehensive watering programme must be implemented for all new planting during the establishment phase. 4.3.4 – 4.3.17 - the proposed woodland planting stock list should be further discussed with local authorities. Species should be chosen that are characteristic of the local landscape and resilient to climate change. Opportunities should be taken to incorporate locally important species, include native black poplar and Huntingdonshire elm (resilient to Dutch elm disease) 5.2.5 - hedgerow management should also be managed for the benefit of farmland birds, particularly those that nest in hedgerow / mature scrub (turtle dove). 5.2.7 - we understand the proposed grazed pasture / neutral grassland is proposed within the fields with solar arrays, which are highly unlikely to provide suitable breeding habitat for ground-nesting species. Therefore, suggest Is considered unlikely that grassland within the solar panel arrays will provide suitable breeding habitat for ground-nesting birds. Suggest reference to breeding habitat is removed, unless evidence can be provided to substantiate these claims. 5.3.2 - gap should be provided within the fenceline, or fences raised off the ground, to allow access to solar array fields by mammals. However, it should also be confirmed that no mammal access should be provided within areas identified as potential nest sites for ground-nesting bird, to help control predation and maximise successful fledging. 5.4.9 - existing ditches should be managed sensitively for wildlife as part of the scheme. This should be included within the OLEMP. 6.1.2 - the Council is concerned that after decommissioning, habitats of important for biodiversity, including species-rich grassland and well as any other habitats of local / county value which have developed through the lifetime of the scheme, may be lost following returning land to the landowner. This would effectively result in a loss of biodiversity value as a result of decommissioning and therefore, the Council seeks these habitats are retained in perpetuity. The OLEMP does not consider the management restrictions of schedule monument to protect its archaeological interest. Confirmation sought as to how the grassland can be managed for nesting ground-birds and archaeological interest

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Ecology and Natural	Appendix 2-3 Outline Construction Environmental Management	The ecological mitigation set out in Table 5.3 is very brief and should be expanded. Greater consideration should be given to impacts of water pollution, particularly on pond P43. More detailed methodology for pre-commencement surveys should be provided, for example – what length of watercourse will be addressed for water vole? Compensatory habitat must be constructed prior to commencement of habitat destruction works.
Ecology and Natural Conservation	PEIR Appendix 2-5 Outline Decommissioning Environmental Management	The Council welcomes confirmation that woodland, hedgerow and tree planting will be retained as part of the decommissioning process. However, the Council is concerned that other habitat, that may have developed into priority habitat or habitat of district / county importance, supporting notable species or provided as ecological mitigation, will be removed during the decommissioning process. This would include habitat that has been provided to secure up to moderate benefits to protected species throughout the operational phase. Therefore, the Council considers it appropriate to seek retention of priority habitat or habitat of district / county importance, or supporting notable species, that have developed on the site. The DEMP should also consider long-term management of this habitat and how it will be achieved.
Water	PEIR Chapter 8	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 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. The proposals have also 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 promoter 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. It is proposed that appropriate measures will be remediated and retained during the operational which is also supported by the LLFA phase and we 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

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		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 PV 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. High surface water flood risk is present on both sites C and D. Altering natural flow paths should be avoided where possible and consideration should be given to the design and layout of the BESS. 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. What we require under the wider DCO: - 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. - Details drainage layout plans for the PV rows and BESS unit areas for each catchment - Detailed SuDS and drainage proposals to protect the receiving watercourse for the construction, operation and decommission - Modelling for the 0.1% AEP SWFR extent not available – Figure 8-3 - Demonstration of pollution risk areas and how water is managed during all stages in detail for each catchment, ensuring water is suitably managed at all stages - Infiltration testing to confirm rates if viable - Flow rates for each individual catchment - Maintenance proposals in line with best practice guidance - Sight of the Watercourse Crossings Review document
Traffic and Transport	PEIR Chapter 9	H.D.M.

Topic areas and Specialism	Proposal aspect referred to	Comments
		It is noted no details have been provided regarding the geometric layouts of the proposed accesses to the public highway. Cambridgeshire County Council would ask this is provided. As part of the DCO the Local Highway authority will see protective provisions. This is to include condition surveys prior to construction phase commencing, to assess any related damage to the approach roads in Cambridgeshire and an agreement to remediate any damage caused by the development subsequently. Restoration of temporary access points to pre-development condition are to be agreed with and authorised by the Local Highway Authority. **<u>Accesses</u>** **Access SA16** 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. Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used. Can the promoter confirm the level of use for this access at the operational phase and any changes to the access between construction and operational. Please note any alteration or piping of ditches to or improvements to existing accesses will require Lead Local Flood Authority approval. 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 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. We welcome engagement to confirm the highway

Topic areas and Specialism	Proposal aspect referred to	Comments
		boundary. Detailed highway boundary information is available upon requested from Cambridgeshire County Council's Highway Records Team via searches@cambridgeshire.gov.uk. We encourage the promoter to request this and show on access drawings. **Accesses SA14 and SA15** 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. Cambridgeshire County Council asks the available splays to be increased in these locations and to supply locations of speed surveys and data. The visibility splay shown for Access SA14 appears to extend outside of the highway. It is shown cutting into a hedge feature. Hedges are not considered to form part of the highway and would typically be a boundary feature. There is evidence to suggest the hedge feature 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. **Access SA13.** Access is indicated within document PIER Fig 2-5however there are no details of traffic movements associated with this access. The promoter should be invited to clarify why it is necessary to use this element of public highway. Mitigation measured are needed on Moore Road to accommodate construction traffic. Details of traffic movements associated with this access should be provided during and after construction, Visibility splays do not appear to have been supplied for this access point. Proposals for this access point to be clarified. Applicant to note that there are physical features in this location that might cause the legal extent of the highway to be questioned. **Access SA12**

Topic areas and Specialism	Proposal aspect referred to	Comments
		Access visibility looks to be in accordance with recorded speeds. We ask the locations of speed surveys and data are supplied. Full details will be required for simultaneous two-way tracking of the largest vehicles likely to be used. It is noted that no traffic is indicated to be going into or coming from Great Staughton. Could we ask the promoter to confirm this is the case. 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. Similar to Moor Road the promoter 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 SA 11 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. I can see no benefit in using the public highway when a further access track adjacent the route of the cable would remove many issues. **Accesses SA10 & SA11** Northern Junction splays indicated at 2.4m x 103m based on 39.9mph recorded speeds which is acceptable. Please supply speed date and location of survey. Southern junction splays indicate 2.4m x 119m based on 43.6mph 85%ile recorded speeds which is acceptable. Please supply speed date and location of survey. 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 Cambridgeshire County Council 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

Topic areas and Specialism	Proposal aspect referred to	Comments
		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 the extent of the public highway that exists on the ground. Where there is any doubt as to the physical public highway extent, please contact the Highways Records team at Cambridgeshire County Council for further guidance. All other junctions appear to be in Bedfordshire for which we refer to Bedford Borough Council's consultation response. The Local Highway Authority would require accesses and highway works to be secured using section 278 agreements, with our standard document being included within the DCO and Protective Provisions. **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. Typically, capacity issues relating to highway in this area happen at junctions, and therefore junction counts will better inform proposals. **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 from Cambridgeshire County Council. This data will also highlight any cluster sites. **9.6.30** It is noted the construction phase will last 30 months. **9.6.32** The use of TEMPRO is acceptable. **9.6.35**

Topic areas and Specialism	Proposal aspect referred to	Comments
		The promoter should check with Huntingdonshire District Council regarding any committed development. **9.7.1** HGVs movements should seek to avoid driving through Great Staughton, instead utilising haul roads. **9.8.4** Trip generation has been calculated by using the promoters experience, however there is a lack of evidence provided to support this. **9.8.6 and Table 9.12: Estimated Construction Traffic** We invite the promoter to provide further evidence of their estimated construction traffic. **9.8.8** The promoter's assumptions are based on HGV's not entering the site during the network AM/PM peaks. Therefore, this would need to be secured through a Requirement for a Construction Traffic Management Plan to be approved by the Local Highway Authorities. **9.8.9** It is noted the promoter is suggesting 22 HGV movements per day, and 88 HGV movements per day for construction of the access track for the first 12 weeks. **9.8.10** In addition to the HGV movements the promoter is suggesting an additional 854 staff visiting the site per day. The promoter 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 evidenced ordata provided to support them. If there are 854 staff and all drive, then there will be 1708 two way vehicle movements per day. Whilst this is unlikely, no justification has been provided on how many staff will car share. **9.8.20**

Topic areas and Specialism	Proposal aspect referred to	Comments
		A percentage impact assessment does not show how the network or junctions are currently operating. Cambridgeshire County Council would seek further discussion with the promoter as to how this can be shown. **9.8.22** Note Cambridgeshire County Council's Transport Assessment Requirements requires all junctions which experience more than 30 new movements in either peak to be modelled. **Conclusion –** Further information as identified above is asked to be added and included in the application when it is submitted. 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. Cambridgeshire County Council recommends the promoter reviews the County's Transport Assessment Requirements document which can be found in the link below. Furthermore, Cambridgeshire County Council is happy to engage with the promoter in further pre application advice.
Noise and Vibration	PEIR Chapter 10	The Council is not the statutory consultee for this subject area and so would expect the promoter to consult Huntingdonshire District Council and Bedford Borough Council on this matter regarding the site and any associated infrastructure that falls within the relevant council's boundary. Cambridgeshire County Council would defer to Huntingdonshire District Council and Bedford Borough Council for a detailed response.
Air Quality	PEIR Chapter 11	The Council is not the statutory consultee for this subject area and so would expect the promoter to consult Huntingdonshire District Council and Bedford Borough Council on this matter regarding the site and any associated infrastructure that falls within the relevant council's boundary. Cambridgeshire County Council defers to Huntingdonshire District Council and Bedford Borough Council for a detailed response.
Ground Conditions	PEIR Chapter 12	The Council reserves the right to comment on this subject through technical working groups and future consultation.

Topic areas and Specialism	Proposal aspect referred to	Comments
Land and Soils	PEIR Chapter 13	The Council reserves the right to comment on this subject through technical working groups and future consultation.
Socio Economics	PEIR Chapter 14	The Council reserves the right to comment on this subject through technical working groups and future consultation.
Climate Change	PEIR Chapter 15	Carbon emissions: The Council agree that, for the purpose of the GHG assessment, it is reasonable to assume that the baseline GHG emissions for the Site, without the proposed development, would be zero. The GHG emissions from the construction phase (2027 to 2030), are estimated by the promoter at 330,882 tCO_2e, and further emissions during the operational phase (from 2030 to 2070) are estimated by the promoter to be 282,378 tCO_2e, plus 6,736 tCO_2e for decommissioning. The total project lifetime emissions are therefore estimated by the promoter 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. 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 scheme is a small proportion of local carbon budgets, except for the decommissioning phase. 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 project will only ever displace gas-fired power stations, for its entire lifetime. For most types of projects, we believe that the long-run marginal emissions factors from DESNZ's Green Book supplementary guidance are the most appropriate comparator (15.8.16). However, the Council recognises that the forecast grid decarbonisation over time will only occur

Topic areas and Specialism	Proposal aspect referred to	Comments
		if more renewables projects are implemented. This results in a ‘Catch-22’ situation for the purposes of assessing GHG emissions from such projects. The Council note that the Scheme is expected to produce 15,980,748 MWh electricity for export to the national grid over its 40 year lifetime. The lifetime carbon intensity (38.8gCO_2e/kWh) is also a useful figure, and we recognise that this is far lower than most other forms of electricity generation other than wind (Table 15.18). Overall, The Council would agree that the scheme is likely to have a beneficial significant effect on GHG emissions. However, we 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. Climate resilience: The assessment of resilience appears adequate. The Council have no further comments to add at this stage.
Other Environmental Topics	PEIR Chapter 16	<u>Health</u> Please see below comments related to Health. <u>Waste</u> 16.3.27 – Further to that raise earlier relating to replacement of PV panels and batteries during the operation phase, this needs to be recognised in documents. We invite the promoter to provide more detail as to what is meant by ‘vast majority’ of PV infrastructure being recycled providing more of a breakdown to better understand the impact. Major Accidents and Disasters 16.4.16 – Cambridgeshire County Council welcomes the proposal to prepare an Outline Battery Safety Plan (oBSMP) and compliance secured through a requirement in the DCO. We welcome

Topic areas and Specialism	Proposal aspect referred to	Comments
		further engagement with the local authorities and Fire and Rescue Services who are responding the statutory consultation separately.
Cumulative Effects	PEIR Chapter 17	Cambridgeshire County Council welcomes the 10KM area from the scheme boundary as shown in Figure 17-1. 17.6.1 Recognising the further work proposed Cambridgeshire County Council reserves the right to comment on this subject through technical working groups and future consultation. There are a number of existing 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 considered in the collective.
Summary of Effects	PEIR Chapter 18	Please note the comments above.
General comments not specific to a chapter of the PEIR		
Health	Preliminary Environmental Information Report Volume 1 – Main Report Chapter 16: Other Environmental Topics	16.1.2 Due to the statement 'significant effects were not predicted at the EIA Scoping stage and the Planning Inspectorate confirmed that individual assessment chapters are not required.' Subsection 16.2 It appears that matters pertaining to traffic; air, dust and odour; hazardous waste and substances; noise; have been discussed however the Council remain concerned it is limited and has not considered mental health impacts resulting from visual amenity, given the size, scope and timeline of this project. A further concern is around the cumulative health/ mental health impacts from the development in conjunction with surrounding shortlisted development (the additional solar farms, East West Rail etc). 16.2.7 states 'Environmental Statement should assess, through consideration within the full EIA process, health effects for each element of a project, identifying adverse impacts and the mitigation measures to avoid, reduce or compensate for them. It is further noted that cumulative developments should be considered where relevant' Yes, The Council consider as stated above that mental health impacts and potential cumulative impacts both intra project and with the surrounding development must be considered very closely. 16.2.13 'Huntingdonshire Local Plan to 2036, adopted in May 2019, also includes specific reference to HIA with Policy LP 29 requiring different levels of HIA for differing scales of

Topic areas and Specialism	Proposal aspect referred to	Comments
		development, to support the overriding purpose of facilitating safe, health and inclusive communities. As per the comparative policy for Bedford identified in 16.2.12, the inclusion of Human Health within the EIA process is considered an appropriate mechanism for addressing the human health impacts for the Scheme.' Cambridgeshire County Council does not agree with this statement. HIAs are a best practice response, and we would have preferred a proportionate HIA however as a this has been scoped out we still would like to see a Mental Health Impact Assessment as standalone document or mental health addressed as part of Health in the ES.
Health	PEIR Volume 2 Appendix 2-3: Outline Construction Environmental Management Plan (oCEMP) & Appendix 2-5 Outline Decommissioning Environmental Management Plan (oDEMP) PEIR Volume 2 Appendix 2-4: Outline Operational Environmental Management Plan (oOEMP):	The Site will be secured by temporary fencing (e.g. Heras fencing) during the Construction Phase. Throughout the operational life of the Scheme, the Site will be secured by security fencing, with overall management of security resting with the Site Owner / Operator. All of the fencing though entirely necessary for risk management and safety, affects the overall visual amenity of the sites. It is very important that the site is screened with planting. Also considerations need to be given around severance and access through / around the site- possibly via a new Public Right of Way.
	Community safety	'No health pathway has been identified between the Scheme and this wider determinant of health'

Topic areas and Specialism	Proposal aspect referred to	Comments
		The Council would like to raise a questions regarding the BESS considerations (Battery Storage). We would like to gain more information about health (including fire risk and EMF) of those in proximity to the BESS in the Outline Battery Fire Safety Plan.
	Community identity, culture, resilience and influence	‘No health pathway has been identified between the Scheme and this wider determinant of health’ Some of this information has been addressed in Bio Physical Environment documentation however, the Council has Concerns around the community resilience to construction phase with simultaneous decommissioning of certain elements and associated impacts for 30 months with the cumulative effects. Any perceptions of negative health impacts and community concerns need to be addressed in an open channel between the developer and local communities & LGA if needed.
	Open Space Leisure and Play Preliminary Environmental Information Report Volume 1 – Main Report Chapter 5: Landscape and Visual	‘No health pathway has been identified between the Scheme and this wider determinant of health’ The Council considers Open Space, Leisure and Play includes green space, the visual amenity of the site and the views of said green space– any potential impacts of the solar park and associated health outcomes including mental health have not been discussed in this documentation. Construction Short term landscape effects Operation Longterm 10 yrs+
	Preliminary Environmental Information Report Volume 1 – Main Report Chapter 4 –	4.3.6 Temporal scope Construction- the impact of the 30 months Operation 40 years Decommissioning 1-2 years

Topic areas and Specialism	Proposal aspect referred to	Comments
	Environmental Impact Assessment Methodology	The Council has concerns around the community resilience to construction phase with simultaneous decommissioning of certain elements and associated impacts for 30 months with the intra-project cumulative effects as well.
	Substation	The Council would like to raise a Substation expansion query – regarding community impacts on residents in the St Neots Area – we would like to review the EHO responses so that we can have a discussion with the promoter regarding any possible impacts.
	Further Note	Due to availability of resources and the relatively short period in which to respond to the promoter's extensive PEIR, and with Health not in a standalone chapter nor HIA but rather embedded across multiple documents - we acknowledge that The Council's Public Health Team may identify further areas requiring greater detail going forward.
Public Rights of Way (PROW)		Where any works are required within PROW, for example where construction access or cable routes utilise or cross Public Rights of Way, then prior to the commencement of development, a condition survey needs to be submitted to and authorised by Cambridgeshire County Council. The restoration of paths to an acceptable condition must also be authorised by CCC. There are two Definitive Map Modification Order (DMMO) applications within the Cambridgeshire section of the proposed development. Without prejudicing the outcome of these applications, we would request that permissive rights for equestrians and cyclists are provided along those routes until either the lifespan of the development ends, or in the case of the DMMO application being upheld, public bridleway(s) are confirmed along the routes. This would provide improved east-west off-road connectivity for non-motorised users which would support the aims of the Cambridgeshire County Council Rights of Way Improvement Plan. There is an opportunity to provide a new circular permissive bridleway around the edge of the proposed grassland area on the Northeastern side of site D, which would extend the options of circular routes available to the benefit of Great Staughton residents. Information boards could be placed to explain the value of the proposed scheduled monument. The Council note that after ten years and once planting is established there will still be significant level of impact on the visual receptors on the following paths: • Little Staughton parish o Public footpath 312/1: Moderate-Major Adverse (Significant) • Hail Weston Parish

Topic areas and Specialism	Proposal aspect referred to	Comments
		o Public footpaths 112/5, 112/6, 112/7 and 112/8: Moderate Adverse (Significant) This has the potential to diminish the public enjoyment of the PROW network. Taking this into account, we would seek that the scheme proactively delivers, or provides appropriate funds for, public rights of way or public access improvements within the landscape and visual assessment study area, to mitigate the loss of visual amenity on the routes listed above.
Legacy Fund		Cambridgeshire County Council welcomes the proposal for a legacy fund. The response by the public to the three options for how this fund could be delivered is key to shaping the legacy fund. We would welcome further engagement with the promoter to discuss the appropriate governance arrangements and how best to secure this for the communities.

END