

## **East Park Energy Development Consent Order (EN010141)**

### **Comments on the Applicant's draft itinerary for the ASI**

Stop East Park Energy (SEPE) is an independent, community-led group established in response to the proposed East Park Energy solar and Battery Energy Storage System (BESS) development. The group, which operates on an unfunded, entirely voluntary basis, has more than 1,000 registered supporters, and comprises residents, landowners and stakeholders from across Hail Weston, Great Staughton, Little Staughton, Pertenhall, Keysoe, Swineshead, and neighbouring settlements including Perry, Stonely, Kimbolton, Catworth, Buckden and St Neots, all of whom may be directly or indirectly affected by the project.

This submission considers the Applicant's draft itinerary for the Accompanied Site Inspection (ASI), in relation to those locations set out by SEPE in its submission on suggested locations for the site visit and a range of others previously identified by Interested Parties. Many of the same broad locations are included. However, in several cases, the proposed stopping points do not appear to illustrate the specific effects identified within the SEPE and other submissions, particularly in relation to constrained sections of the B645, settlement-edge transitions, the wider River Kym valley landscape relationships, cumulative views between solar developments, and impacts on sensitive localities.

#### **1. Drive from Great Staughton to the A1 and return via site D**

Interested Parties requested that the Examining Authority consider the construction route from the A1 slip road to Site D and views from the B645 towards the site. While one representation includes travel along this section of the B645 between Great Staughton and the A1 junction, it is currently identified as a drive-through with no stopping locations.

As a result, the opportunity to fully appreciate the relationship between Site D, the surrounding landscape, and the highway network may be limited. Concerns regarding the safety and constraints of the B645 have been raised across multiple Relevant Representations by individuals, local authorities and parish councils.

It is respectfully suggested that it would assist the Examination if this location were considered as a stopping point.

## **2. Point B – Staughton Moor**

Interested Parties identified the importance of an on-foot assessment from Moor Road via Staughton Moor Road and Bridleway 112/7 towards Site D (the proposed Battery Energy Storage System), including reference to LVIA viewpoints 67 and 68 and the cumulative context of nearby solar developments at High Wood Solar Farm.

Given the importance of understanding the visual experience from publicly accessible rights of way, a clearly defined on-foot assessment at this location would assist in understanding both landscape character and cumulative effects associated with Site D and surrounding infrastructure.

## **3. Point C – St Andrews Church, Great Staughton**

At present, no specific objectives are identified to explain how this location will be used to assess effects arising from the development. In particular, there is limited reference to the relationship between the proposed scheme and existing archaeological interest, the surrounding rural landscape, and the sensitivity of this location, including the Grade I listed St Andrews Church and associated conservation area.

Consideration of LVIA viewpoints 61 and 62, alongside a more detailed assessment of heritage impacts and archaeological potential, would assist the Examination.

## **4. Drive-through from point C to point D**

The applicant proposes a drive-through along Great Staughton Road to the Kangaroo crossroads. This section includes access point SA12, where construction traffic would join the main road. At New Farm, there is an opportunity to consider relevant LVIA viewpoints and the openness of the landscape, where screening may be challenging.

Given the significance of this location, a stopping point would enable a more detailed understanding of the potential interaction between construction traffic and the existing rural road network, including the implications of large vehicles joining and travelling along a constrained route.

## **5. Point D – Kangaroo crossroads**

LVIA viewpoint 46 is identified for consideration at this location. However, there is limited reference to the potential effects on an existing kennels business, including the implications of being surrounded by solar panels and the potential for noise and disturbance during construction.

It would be appropriate for the Examination to consider the economic and operational implications for this business, particularly during the multi-year construction phase.

## **6. Point F/G – Lodge Farm and Green End**

The itinerary identifies a 'pause' rather than a formal stop at this location, despite the presence of several features of relevance, including construction access points SA07, SA08 and SA09, LVIA viewpoint 42, Lodge Farm equestrian centre, a school bus route, and local road crossings affected by construction traffic.

Given the interaction between construction traffic, equestrian use and school transport movements, this location represents a sensitive point within the network. A brief pause may not provide sufficient opportunity to understand:

- the narrow rural character of the road
- visibility at access junctions
- interactions between construction vehicles and horse riders
- implications for regular school transport

A formal stop would therefore allow a more complete appreciation of safety and amenity considerations.

## **7. Point H – All Saints Church, Little Staughton**

This location illustrates the open character of the landscape and the setting of rural historic churches. Positioned on a high ridge, it provides extensive views across the River Kym valley and surrounding settlements.

Given its prominence and popularity as a local route, additional time at this location would assist in understanding the scale of the proposed development and its visual effects on the wider landscape.

## **8. Point I – Hoo Farm**

Hoo Farm represents one of the highest points in North Bedfordshire and offers extensive views. From Footpath 20 and LVIA viewpoint 23, cross-valley views are available across settlements and the wider landscape to the south and south-west.

This location enables an understanding of how the scheme would appear across the landscape as a whole, rather than from isolated viewpoints. It also demonstrates how the valley system and settlement pattern contribute to landscape character.

A longer stop, including a short walk to the top of the hill (with permission granted), would assist in understanding the scale and visual impact of the scheme, as well as its relationship to the River Kym floodplain. This includes consideration of panel locations within flood-risk areas and the relationship between access routes and the river corridor.

## **9. Point J – Wood End, Pertenhall**

This location, including Footpath 5 and LVIA viewpoints 20 and 21, provides an opportunity to consider the relationship between settlement and heritage.

A broader appreciation of the wider landscape context, rather than a focus solely on discrete viewpoints, would assist in understanding these relationships.

## **10. Point L – Grange Court Barn**

This location has also been identified by the British Horse Society and Bedford Borough Access Forum. It is relevant in relation to concerns about the interaction between construction traffic and existing equestrian and recreational use of rural roads.

Consideration should be given to changes in landscape openness, as well as the suitability of the local highway and access network for mixed use during construction. Adequate time at this location would assist in assessing these matters.

This stop would also allow the Examining Authority to inspect a badger sett within the Order Limits (the precise location is withheld from the public domain due to legal protections), one of the many protected setts across the proposed construction sites.

## **11. Drive from Manor Farm to Sandy Lane, Swineshead**

A stop is acknowledged at this location; however, the itinerary does not clearly identify the specific sensitivities to be assessed.

SEPE requested that the site visit include the Manor Farm solar power plant to allow direct observation of the limited effectiveness of existing landscape screening. The absence of any reference to this in the draft itinerary may limit the Examination's ability to assess how proposed mitigation could perform in comparable real-world conditions.

Swineshead Wood is a Site of Special Scientific Interest and SEPE understands that it supports several rare bat species, including Barbastelle, Nathusius' Pipistrelle, Noctule and Daubenton's bats. It is also a valued local amenity, noted for its ancient woodland and biodiversity.

A visit would enable direct consideration of the proximity of the proposed development to this sensitive environment and the potential implications for bat foraging patterns and ecological function.

## **12. Consideration of additional local road network**

Interested Parties, including parish councils, identified the importance of visiting a number of local roads that may be affected either directly or indirectly by project construction traffic. This includes routes that could be used by construction vehicles

outside of the defined traffic routing strategy, as well as roads likely to experience increased use as a result of displacement of local traffic.

At present, these routes do not appear to be included within the proposed itinerary.

While the Applicant's traffic management approach sets out defined construction routes, it does not necessarily preclude the potential for deviation in practice, whether through driver behaviour, navigation systems or changing site conditions. In addition, the displacement of existing traffic away from affected routes may result in increased use of alternative local roads, including those with limited capacity or sensitivity.

The absence of these routes from the itinerary may therefore limit the ability of the Examination to fully understand:

- the wider distribution of traffic effects beyond the defined construction corridors
- the suitability of the surrounding rural road network to accommodate displaced traffic
- potential impacts on smaller settlements and wider areas of rural highway infrastructure
- the cumulative interaction between construction traffic and existing local movements

Given these considerations, it would assist the Examination if representative examples of these routes were included within the site visit. This would enable a more complete appreciation of the potential extent of traffic-related effects across the wider network, rather than focusing solely on the primary proposed construction routes.

It may also assist the Examination if the ASI were, so far as practicable, to include inspection of the principal proposed accesses where they interact directly with the public highway, in order to inform understanding of local geometry, visibility, turning constraints and the relationship between access design and surrounding road conditions. This could include, as representative examples: SA01/SA02 at the B660; SA03/SA04/SA05/SA06 in relation to Great Staughton Road (including sections before and after the Kangaroo crossroads); SA07/SA08/SA09 at Green End; SA10/SA11 at Spring Hill/Green End; SA12 at the Zantra Business Park access with Great Staughton Road; SA13/SA14/SA15 at Moor Road; and SA16 at the proposed main site access on the B645.

## **Summary**

In summary, it is considered that these matters would benefit from further consideration within the final site inspection arrangements, in order to support a more complete understanding of landscape, heritage, ecological and safety-related effects.