

2 April 2026

██████████
Cambridgeshire County Council
PO Box 761
Huntingdon
Cambs PE29 9QR

Dear Mr ██████████

East Park Energy DCO Examination (EN010141)

Stop East Park Energy (SEPE) is an independent, community-led group representing more than 1,000 residents, landowners and stakeholders across the affected area. SEPE operates on an entirely unfunded basis. We are writing to provide Cambridgeshire County Council with a copy of SEPE's Written Representation (WR) and to identify sections that may be of assistance in relation to the matters identified by the Examining Authority in its Rule 6 letter for inclusion in any Statement of Common Ground between the Applicant and Cambridgeshire County Council.

The WR is a structured document with numbered topic sections, a legal appendix, a cross-reference appendix and a consolidated procedural-deficiency table intended to assist navigation and traceability. We have today submitted the Written Representation to the Planning Inspectorate; however, it will not enter the public domain until the Examining Authority authorises publication of Deadline 1 submissions. The document should therefore be treated as confidential and embargoed until that time.

We understand that the relevant local authorities are working collaboratively in relation to this development, and for completeness we have also shared this document with Bedford Borough Council and Huntingdonshire District Council. We would be grateful if it could be handled on a restricted basis within the authorities' officer teams and not circulated more widely pending formal publication.

We appreciate the detailed work already undertaken by the Council across its statutory responsibilities, including highways, public rights of way, archaeology and flood risk.

This letter is provided in a constructive spirit to help signpost parts of the WR that may assist officers in reviewing the application, preparing the Local Impact Report and considering areas where further clarification, evidence or drafting changes may be required.

1. Principle of Development

The principal sections relevant to this topic are Section 4.0 (Planning policy and context), Section 5.0 (Agricultural land quality and food production), Section 10.0 (Site selection and spatial alternatives) and Section 21.0 (Planning balance). Sections address alternatives, BMV land, proportionality and the wider planning balance.

These passages may also assist consideration of the wider rural economic implications of long-term removal of productive agricultural land.

2. Traffic and Transport, including traffic modelling and assessment of alternatives

The core traffic material is in Section 13.0 (Construction traffic and routing impacts), supported by Section 14.0 where construction controls interact with routing and management. Passages address strategic routing, overspill via the B660 corridor, peak HGV modelling, methodological concerns, abnormal indivisible loads and route-control safeguards.

This material may be particularly relevant to Cambridgeshire County Council's consideration of modelling assumptions, network effects and enforceability of routing controls.

The WR also highlights the importance of a comprehensive Routing Management Plan covering all HGV movements (not solely abnormal loads), together with enforceable monitoring mechanisms and sanctions to ensure compliance.

3. Effects on the Public Rights of Way network and on non-motorised users

The key section is Section 17.0 (Public Rights of Way, Recreational Amenity and Community Access). This section addresses landscape and visual effects on PRoW users, construction-phase impacts, comparative precedent and the adequacy of mitigation. Relevant supporting material also appears in Section 13.9.

4. Economic and Social Effects

The most relevant material is in Section 9.0 (Socio-Economic and Community Impacts), supported by Section 5.0 and Section 21.5 where community amenity and rural economic impacts are weighed in the planning balance.

5. Environmental Impact Assessment, including cumulative effects

The principal sections are Section 4.0, Section 19.0 (Cumulative effects with neighbouring solar, BESS and NSIP projects) and Section 21.8. These passages address adequacy of baseline information, methodology, cumulative effects and decision-stage confidence under the EIA Regulations.

The key consolidated signpost is Appendix M, read with Section 21.8.

6. Water Environment and Flood Risk

The most relevant material is in Section 6.0 (Soil resources, hydrological function and environmental baseline adequacy), supported by Section 14.3 (Hydrology and surface water control). These passages address soil-hydrology interaction, drainage

systems, flood-risk methodology, SuDS standards, dewatering and ground-condition baseline issues.

The WR notes that key hydraulic calculations, detailed drainage layouts and pollution-risk management information may be required before confirming that flood risk will not increase elsewhere.

7. Good Design

The key passages are Section 8.4 (Layout, Design and Operational coherence), Section 10.0.2 and Section 20.7. These sections address layout fragmentation, operational coherence, mitigation-led design and the absence of clearly defined design parameters.

8. Any other potential effects, including heritage assets, biodiversity, air quality, emissions and contamination

For heritage, the key section is Section 12.0 (Cultural heritage and archaeology), with related landscape-setting analysis in Sections 8.1–8.2.

These passages include discussion of archaeological uncertainty and potential impacts on designated assets and buried remains.

For biodiversity, the key material is Section 11.0 (Ecology and Biodiversity), supported by Appendix P.

The WR also raises issues regarding completeness of baseline survey data, farmland bird impacts and the robustness and enforceability of Biodiversity Net Gain delivery.

For air quality, emissions, contamination and emergency planning, the relevant material is spread across Section 6.2, Section 6.6, Section 14.3, Section 14.8 and Section 18.0 (Lifecycle carbon, recycling obligations and decommissioning funding), together with Section 15.0 (Battery energy storage system safety and environmental risk). These passages address soil and groundwater contamination risks, construction and operational emissions, lifecycle carbon transparency, recycling assumptions, replacement impacts and decommissioning funding/security, as well as BESS-specific issues including emergency response capacity, thermal-runaway scenarios, fire-water contamination, EMF and tonal noise, and operational safety evidence.

The WR also notes that the BESS is designed to operate on both import and export, which may be relevant to the balance of policy support relied upon. These sections may therefore assist consideration of pollution risk, environmental protection, emergency planning arrangements and the adequacy of the Outline Battery Safety Management Plan. The corresponding procedural signposts include #6A, #6E and the BESS-related safety deficiencies identified elsewhere in the WR and Appendix M.

9. Environmental Management Plans, both during construction and operation

The principal sections are Section 6.3, Section 14.0, Section 15.8, Section 17.6 and the DCO securing provisions in Sections 20.0. These address outline management plans, soil controls, BESS safety planning, PRoW mitigation and how these matters are or are not secured through the draft DCO.

10. The draft DCO, including requirements and protective provisions

The key section is Section 20.0 (Draft Development Consent Order), supported by Appendix N. Section 20.0 addresses BESS safety, noise, lighting, replacement-phase controls, traffic, soil protection and protective provisions.

11. Procedural deficiencies and evidence gaps

For ease of navigation, the principal consolidated schedule is at Appendix M, with supporting traceability in Appendix L and cumulative context in Appendix I. The WR identifies these appendices as part of the structured evidential framework supporting the Representation.

SEPE hopes this cross-reference is of practical assistance to Cambridgeshire County Council in navigating the WR against the SoCG topics identified by the Examining Authority. We would be pleased to clarify any of the references above if that would assist officers in reviewing the material.

Yours sincerely,

Stop East Park Energy (SEPE)

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