

2 April 2026

██████████  
Senior Planning Officer (Strategic Team)  
Huntingdonshire District Council  
Pathfinder House  
St Mary's Street  
Huntingdon PE29 3TN

Dear Ms ██████████

**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 Huntingdonshire District Council with a copy of SEPE's Written Representation (WR) and to identify those sections of it that may be of assistance in relation to the matters identified by the Examining Authority for inclusion in any Statement of Common Ground between the Applicant and the 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 Cambridgeshire County 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 planning policy, landscape, heritage, ecology and infrastructure matters. 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 the principle of development 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), Section 20.0 (Draft Development Consent Order) and Section 21.0 (Planning balance). These sections address SEPE's case on alternatives, BMV land, local policy interaction, proportionality and compulsory acquisition.

These passages may assist consideration of Huntingdonshire Local Plan Policy LP10, which seeks to prioritise lower-grade agricultural land and avoid irreversible loss of Best and Most Versatile land wherever possible, and whether the applicant has demonstrated that this policy test is satisfied.

They may also assist consideration of the long-term implications for the rural economy and food production associated with the removal of productive agricultural land.

### **2. Economic and Social Effects, including Local Plan strategy and transport effects on local communities**

The most relevant material is in Section 9.0 (Socio-Economic and Community Impacts), supported by Section 5.0 on agricultural productivity and Section 21.5 on community amenity impacts within the planning balance. These passages address areas including rural employment, farming continuity, food-system resilience, residential amenity, population and human-health assessment, and community-security issues.

Along with other issues, procedural-deficiency signposts associated with these topics are set out in Appendix M, including the socio-economic and population/health deficiencies discussed in the WR.

### **3. Construction Traffic**

The core traffic material is in Section 13.0 (Construction traffic and routing impacts), supported by Section 14.0 (Construction environmental management and mitigation). Section 13.0 addresses routing through local communities, overspill and diversion risk, peak HGV effects, PRow and amenity impacts, and abnormal loads.

Supporting cumulative context is also provided in Section 19.0 and Appendix I.

The WR also highlights the importance of enforceable routing controls and monitoring mechanisms to ensure compliance with any agreed construction traffic routes.

### **4. Environmental Impact Assessment, including cumulative effects**

The principal EIA adequacy material is in Section 4.8 (Review of applicant's EIA methodology), Section 4.9 (Non-Technical Summary: treatment of key environmental effects), Section 4.10 (Summary of policy and legal implications), Section 19.0 (Cumulative effects with neighbouring solar, BESS and NSIP projects) and Section

21.8 (Adequacy of environmental information and decision-stage confidence). These sections address baseline completeness, methodology, cumulative assessment and whether the environmental information is sufficient to enable a reasoned conclusion.

Given the concentration of existing and proposed solar developments within the area, these sections may assist consideration of cumulative landscape, ecological, visual and infrastructure effects.

Procedural-deficiency signposts in Appendix M should be read with Section 21.8, where the WR states that the cumulative deficiencies affect decision-stage confidence under the EIA Regulations and EN-1.

## **5. Landscape and Visual Effects, including lighting**

The principal sections are Section 8.0 (Landscape and rural character), together with Section 14.7 (Construction and operation lighting: assessment and controls) and Section 17.0 (Public Rights of Way, Recreational Amenity and Community Access) where visual and amenity effects on users of the rights-of-way network are addressed. These passages discuss LVIA adequacy, visual evidence, receptor proximity, mitigation assumptions and amenity effects.

These passages may be particularly relevant given the scheme's location and the scale of change identified by the host authority review.

Supporting appendices include Appendix G and Appendix R.

## **6. Any other potential effects, including heritage assets, biodiversity, noise and vibration, air quality, emissions, contamination and emergency planning**

For heritage, the key section is Section 12.0 (Cultural heritage and archaeology), supported where relevant by Sections 8.1–8.2 on heritage setting and landscape context.

These passages include discussion of archaeological uncertainty and impacts on heritage assets and their settings, including views within the Kym Valley landscape.

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

The WR also addresses the delivery, distribution and long-term securing of Biodiversity Net Gain measures.

For noise and vibration, the key material is in Section 16.0 (Noise and vibration), with related BESS-specific evidence in Section 15.0.

Further relevant material is spread across Sections 6.0, 14.0, and 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.

## **7. Good Design**

The WR's comments most relevant to good design appear in Sections 8.0 (Layout, design and operational coherence) and 10.0 (Spatial configuration, design efficiency and land-use optimisation), together with Section 20.0 (Absence of defined design parameters). These sections address fragmented layout, fencing extent, mitigation-led design, residential proximity, north-facing slopes (see procedural deficiency #4B) and whether the layout represents an efficient and proportionate use of land.

## **8. Environmental Management Plans, both during construction and operation**

The most relevant sections are Section 6.0 (Outline soil management plan), 14.0 (Construction environmental management and mitigation), 15.0 (Critical review of the applicant's outline battery safety management plan) and the DCO-related securing provisions in Section 20.0. These sections may assist the Council where it is considering whether outline plans are sufficiently detailed at this stage and whether the draft Requirements adequately secure the mitigation assumed in the ES.

## **9. The draft DCO, including requirements and discharge mechanisms**

The key section is Section 20.0 (Draft Development Consent Order). In particular, Huntingdonshire District Council may find content useful in relation to adequacy of safeguards, decommissioning and financial security, design parameters, BESS safety, noise / lighting / replacement-phase controls, traffic / workforce logistics and soil restoration. The WR also signposts relevant precedent in Appendix N.

Because the WR links many of these concerns to the enforceability of mitigation and the adequacy of the dDCO, the Council may also find it useful to review the concluding discussion in Section 21.0 and the consolidated table in Appendix M.

## **10. Procedural Deficiencies and Evidence Gaps**

For ease of navigation, the consolidated schedule is at Appendix M – Procedural Deficiency and evidence gap table, with supporting traceability in Appendix L – Cross reference table of supporting insertions, and precedent material in Appendix N – DCO precedent Summary table. The WR expressly states that Appendix M is intended to consolidate the principal procedural and evidential concerns raised throughout the Representation.

SEPE hopes this cross-reference is of practical assistance to Huntingdonshire District 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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