

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

### **Comments on the Applicant's Virtual Site Inspection Plan**

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.

### **Comments regarding the Applicant's proposed UAV drone and 360-degree video walkover surveys**

SEPE recognises that digital survey material may have some limited utility as a supplementary aid to the Examining Authority, particularly in assisting with recall of locations viewed during physical inspections. However, SEPE submits that such material should not be relied on as a substitute for on-the-ground inspection of the affected landscape, Public Rights of Way (PRoWs), roads, settlements and visual receptors.

SEPE's principal concern is that drone footage, panoramic video and body-mounted camera surveys materially flatten and simplify the lived experience of the landscape. The East Park area is characterised by rolling topography, long-distance views, enclosed valleys, changing gradients, and complex visual relationships between settlements, ridgelines, vegetation and open countryside. These characteristics are experienced dynamically by walkers, riders, residents and road users moving through the landscape. In SEPE's submission, digital media cannot adequately replicate:

- the changing sense of enclosure and openness across the landscape;
- the cumulative effect of industrial infrastructure across multiple viewpoints;
- the physical relationship between receptors and proposed infrastructure;
- the experience of elevation, gradients and landform;
- the impact of fencing, haul roads, BESS infrastructure and security features on PRoWs;
- the interaction between construction traffic and constrained rural routes; or
- the experiential and amenity value presently associated with the area.

SEPE therefore submits that any digital survey material should be treated only as supplementary contextual information and not as a replacement for direct site inspection by the Examining Authority.

## **1 General concerns regarding digital surveys**

### **1.1 Landscape character and topography**

The Applicant's proposed drone and video surveys risk materially understating the sensitivity of the receiving landscape. Video, drone footage and photography inherently compress distance and flatten topography, thereby reducing the apparent prominence and spatial extent of large-scale infrastructure.

The East Park area derives much of its character from expansive elevated views, open countryside, ridgelines, valleys, and the sequential experience of moving through the landscape. SEPE submits that these characteristics cannot be adequately appreciated through digital media alone.

In particular, the cumulative effect of extensive solar arrays, fencing, CCTV infrastructure, substations, a BESS compound and associated development on the perceived openness of the landscape is likely to be materially diminished in drone and panoramic footage.

SEPE further notes that visual impacts associated with the Scheme are not limited solely to static viewpoints. The proposal would alter the experiential quality of numerous walking, riding and driving routes throughout the area. Such effects are inherently experiential and are not readily conveyed through edited or selective digital surveys.

### **1.2 Public Rights of Way and user experience**

SEPE is particularly concerned that digital surveys may fail adequately to convey the likely impact of the development on PRowS and recreational users.

The existing network of footpaths and bridleways is presently experienced as predominantly rural, open and tranquil in character. The proposed development would introduce fencing, security infrastructure, haul roads, construction activity and industrial-scale infrastructure into many of these routes.

The human experience of enclosure, proximity, visual dominance and interaction with construction or operational activity cannot be reliably replicated through body-mounted cameras or aerial footage.

SEPE further notes that the surface treatments and access arrangements required for construction and maintenance traffic are materially different from the present character and use of many PRowS.

### **1.3 Construction traffic and operational activity**

SEPE submits that digital surveys also risk understating the impact of construction traffic and operational activity on constrained rural roads and shared-access routes.

Many affected roads are narrow, winding and heavily used by local residents, walkers, cyclists, horse riders and agricultural traffic. The practical experience of interacting with substantial HGV movements along these routes cannot adequately be conveyed through selective camera footage.

The limitations of filmed surveys are particularly relevant where:

- gradients materially affect visibility and manoeuvrability;
- bends and junctions constrain vehicle movements;
- roads already function as sensitive rural access routes;
- PRowS are closely adjacent to operational infrastructure; or
- users experience the landscape sequentially rather than from isolated viewpoints.

## **2 Comments on specific proposed routes and viewpoints**

### **Route A1–A2**

SEPE submits that digital surveys would not adequately demonstrate the likely impact of the proposed development on walkers and equestrians using the bridleway in close proximity to the proposed BESS compound.

This route should also be experienced from ground level using the footpath towards High Wood in order properly to appreciate how the proposed East Park infrastructure would interact cumulatively with the existing solar installation and the additional consented solar development in the surrounding area.

Only an in-person inspection enables appreciation of the altered environmental character likely to result from the cumulative presence of large-scale infrastructure.

### **Route B1–B2**

This route demonstrates the elevated nature of the surrounding landscape and the extensive views across the proposed development area.

SEPE submits that camera-based surveys materially reduce the apparent significance of elevation and landscape prominence. The visual relationship between the viewer and the wider landscape can only properly be appreciated on the ground.

### **Point E**

SEPE considers this location particularly important because it demonstrates the visibility of the proposed site from the crossroads and along the route towards Pertenhall.

The site is relatively open and visually exposed from this location. The area also incorporates shared access arrangements associated with existing agricultural activity.

A physical inspection is required fully to appreciate the relationship between the proposed infrastructure, surrounding receptors and the openness of the existing landscape.

### **Point F**

This route is currently well used by walkers and experiences relatively limited agricultural vehicle traffic.

SEPE is concerned that use of this route by construction vehicles, together with additional fencing and infrastructure, would materially alter its character and create potential safety concerns.

The route is already enclosed in places by existing boundaries. Additional infrastructure would further intensify the sense of enclosure.

SEPE submits that a site visit by the Examining Authority is essential in order properly to assess these effects.

### **Route G1–G2**

This route involves a gradual slope with expansive views across the countryside.

SEPE submits that the significance of these views and the relationship between the proposed infrastructure and the wider landscape can only properly be appreciated through direct on-the-ground experience.

### **Route H1–H2**

This route follows the ridgeline and provides important views towards the Moat and surrounding countryside.

SEPE considers that the proposed development would materially diminish the present landscape value and openness experienced along this route.

### **Route I1–I2**

This route provides reduced but still important views towards the Great Staughton Road corridor.

SEPE submits that the relationship between the viewer, the surrounding topography and the proposed infrastructure is not adequately conveyed through digital media.

## **Route J1–J2**

SEPE submits that this route should be extended and physically walked by the Examining Authority.

This location provides important views from Birds Egg Farm across Site A and demonstrates how the proposed arrays would extend up the lower slopes of the opposing ridge and sweep behind St Peter’s Church towards Green End, Great Staughton Road and the B660 corridor.

The route also illustrates the degree to which the brook corridor and adjacent footpaths may become enclosed by fencing and solar infrastructure.

SEPE submits that only direct visual experience allows full appreciation of the proximity of infrastructure to rural dwellings and the cumulative industrialisation of the landscape.

## **Route K1–K2**

SEPE considers this route insufficiently represented within the proposed digital survey material and submits that it requires direct on-the-ground inspection.

At present, this route functions as a relatively quiet pedestrian corridor separated from vehicular traffic along the B660.

SEPE further notes that this route coincides with the sewer corridor, which is a material consideration in relation to the proposed use of substantial HGV movements and construction activity.

The extent to which the proposed development could create a visually channelled and enclosed industrial corridor can only properly be appreciated in person.

## **Route L1–L2–L3**

SEPE submits that video and drone imaging are particularly unsuitable for this area.

This route traverses an existing traveller site subject to an enforcement notice and includes sensitive residential receptors together with habitat associated with protected species, including badgers.

An in-person visit is necessary properly to appreciate the extent to which nearby dwellings may become enclosed both to the front and rear by the proposed development.

SEPE also notes the existing hedgerow growth associated with Manor Farm Solar and the tunnel effect created along Footpath 35, notwithstanding that planting has been in place for many years.

This provides relevant real-world evidence regarding the likely effectiveness and experiential impact of proposed mitigation planting.

## **Route M1–M2**

SEPE considers that views of the proposed development from this location are comparatively limited and therefore does not regard this as an essential location for digital recording.

### **3 Additional viewpoint of importance**

SEPE further identifies Footpath 14 leading from Wood End Lane as an additional viewpoint of particular importance.

This footpath rises steeply before crossing into Cambridgeshire. SEPE submits that the Examining Authority should view the landscape from this location looking back towards Birds Egg Farm, the ridge towards Middle Lodge and St Peter's Church.

This viewpoint demonstrates the visibility of the proposed development across rising landform and is frequently used both by local residents and visitors to the area.

SEPE submits that the cumulative visual relationship between the proposed infrastructure, ridgeline and surrounding countryside can only properly be appreciated through direct site inspection.

## **4 Conclusion**

SEPE submits that:

1. Drone surveys, panoramic video and body-mounted camera footage should not be treated as a substitute for direct site inspection;
2. Digital media materially underrepresents the experiential effects associated with topography, enclosure, openness and cumulative industrialisation of the landscape;
3. The likely impacts on PRowers, recreational users and rural amenity are inherently experiential and require physical inspection;
4. The relationship between construction traffic, operational infrastructure and constrained rural routes cannot adequately be conveyed through selective digital footage alone; and
5. A substantial number of the proposed viewpoints and routes require direct on-the-ground assessment in order properly to understand the likely significant effects of the Scheme.

SEPE therefore respectfully requests that the Examining Authority affords limited weight to digital survey material when considered in isolation and ensures that key viewpoints, routes and receptors are inspected in person wherever reasonably practicable.