



EAST PARK ENERGY

East Park Energy

EN010141

Potential Main Issues for Examination

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September 2025

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EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Potential Main Issues for Examination

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1.0 INTRODUCTION

1.1 Introduction

- 1.1.1 This Potential Main Issues for Examination (PMIE) document has been prepared by BSSL Cambsbed 1 Ltd (the 'Applicant') to accompany an application for a Development Consent Order (DCO) for the East Park Energy project (the 'Scheme').
- 1.1.2 The application for the DCO will be submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for the Department for Energy Security and Net Zero pursuant to the Planning Act 2008 ('the PA2008').
- 1.1.3 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of up to 100 MW of electricity in the battery energy storage system (BESS). The precise generating capacity and storage capacity will be subject to detailed design.
- 1.1.4 The Scheme is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council and Huntingdonshire District Council.
- 1.1.5 A full description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

1.2 Purpose of this Document

- 1.2.1 This document has been prepared and submitted in compliance with the Planning Inspectorate's Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (September 2024) ('the Pre-application Prospectus') and Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.
- 1.2.2 Regulation 5(2)(q) of the APFP Regulations provides that "the application must be accompanied by... any other documents considered necessary to

support the application”. The inclusion of this PMIE document as part of the DCO application is therefore intended to fulfil the latest guidance for NSIP applicants, by providing an additional supporting document that aids the examination process.

- 1.2.3 The primary purpose of the PMIE is to provide the Examining Authority (ExA) with a concise summary of the main issues that remain unresolved or of concern to key stakeholders at the time of the application’s submission. In preparing this document, the Applicant has drawn on feedback from the pre-application consultation and engagement process and identified the principal issues or areas of potential disagreement based on input from relevant statutory bodies and the local authority. The format of this document follows the template and expectations set out by the Planning Inspectorate’s 2024 guidance, ensuring that it is presented in a manner consistent with other NSIP submissions.
- 1.2.4 It is important to note that the issues highlighted in this PMIE are not intended to be an exhaustive or definitive list of all matters that may be examined or indeed all of the issues known of at the point the application is submitted. It is intended to highlight those issues considered of particular relevance and importance to the determination of the application. The Examining Authority will carry out its own initial assessment of principal issues once the examination commences, and this document does not constrain that process nor preclude any interested party from raising additional topics or concerns during the examination. Rather, the PMIE serves as an indicator of the potential main issues, demonstrating the Applicant’s awareness of key concerns and commitment to transparency.
- 1.2.5 The Applicant acknowledges that some of the issues identified here may be resolved or narrowed in the period between the application submission and the examination. It is anticipated that ongoing engagement, the provision of clarifications, and the negotiation of any necessary protective provisions will continue during the pre-examination and examination stages. The Applicant is committed to working proactively with stakeholders to address outstanding

points of concern wherever possible, with the goal of reducing the number and complexity of issues that need to be examined formally. This approach aligns with the broader objectives of the Planning Inspectorate's 2024 pre-application reforms, which encourage early issue resolution and a smoother, more efficient examination for all parties.

- 1.2.6 Finally, the Applicant plans to establish Statements of Common Ground ('SoCG') with relevant stakeholders, as is expected to be required in the Rule 6 and Rule 8 letters issued by the ExA pursuant to The Infrastructure Planning (Examination Procedure) Rules 2010 ('the EPR 2010') after the application is accepted. These SoCGs will stay active throughout the Examination process as the Applicant seeks to address any remaining issues, with a final stance submitted before the Examination concludes.

2.0 POTENTIAL MAIN ISSUES FOR EXAMINATION

- 2.1.1 **Table 1** below has been prepared using the Planning Inspectorate's preferred format for the PMIE as set out in the Pre-application Prospectus. The table sets out the main issues which have been discussed with statutory bodies and local authorities throughout the pre-application stage and which have not yet been formally resolved.
- 2.1.2 In most instances, the Applicant has sought to provide information within the application which it considers will enable the matters identified to be resolved. Following submission of the application, the Applicant will continue to engage with the various parties to reach an agreed position.
- 2.1.3 The table summarises the issue, identifies the most relevant stakeholders concerning the issue raised, and lists the application documents that provide information and data on the issue.
- 2.1.4 A RAG status has been applied, as explained below, and the Applicant's position on the likelihood of the issue being resolved during the Examination is set out, with a brief rationale for this position:
- Red – fundamental disagreements which are unlikely to be resolved during Examination;
 - Amber – issues which are in discussion and may be resolved during Examination; and
 - Green – issues that are likely to be resolved prior to or during Examination.

Table 1: Potential Main Issues for Examination

| Ref. | Description of Potential Main Issue (PMI) | Affected Stakeholder(s) | Signposting (to application evidence) | RAG | Likelihood of the issue being resolved during the Examination |
|-------------|---|---|--|-----|--|
| PMI1 | <p>Landscape and Visual:</p> <p>The Applicant has prepared a comprehensive Landscape and Visual Impact Assessment (LVIA) for the Scheme. As the Host Authorities do not have in-house landscape and visual advisers they have provided very limited comment on the scope of the LVIA, but the Applicant understands that they have recently appointed an external consultant to comment during pre-examination and examination. As such, the Applicant is not fully aware of the Host Authorities' position on the scope of the LVIA, or impacts of the Scheme. The Applicant has, however, taken a robust and thorough approach to the LVIA, conservatively identifying viewpoints for inclusion in the assessment.</p> <p>The landscape and visual effects of the Scheme are likely to be a general point of contention during the examination, based on the</p> | <p>Bedford Borough Council</p> <p>Huntingdonshire District Council</p> <p>Cambridgeshire County Council</p> | <ul style="list-style-type: none"> ES Vol 1 Chapter 5: Landscape and Visual [EN010141/DR/6.1] ES Vol 2 Appendix 5-3: Effects on Landscape Character [EN010141/DR/6.2] ES Vol 2 Appendix 5-4: Effects at Viewpoints [EN010141/DR/6.2] ES Vol 2 Appendix 5-5: Effects on Receptors [EN010141/DR/6.2] ES Vol 3 Figures 5-1 to 5-87 [EN010141/DR/6.3] outline Landscape and Ecological Management Plan [EN010141/DR/7.7] | | <p>Medium</p> <p>At this stage, the Applicant does not know the extent to which the host authorities agree or disagree with the conclusions of the LVIA. The Applicant expects to further consult with the host authorities (and their appointed external consultant) in advance of examination following receipt of the relevant representations of each authority. It is expected that any potential areas of disagreement would be narrow.</p> |

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|-------------|--|---|---|-----|--|
| | feedback received from the public during statutory consultation. | | | | |
| PMI2 | Heritage Assets: The Applicant has prepared a comprehensive assessment of impacts on designated and non-designated heritage assets and set out the likely significant effects. The statutory consultation responses from host authorities and Historic England indicated there could be some difference of opinion in relation to the level of effect on designated assets, including the grade I listed church at Little Staughton. | Historic England Bedford Borough Council Huntingdonshire District Council | <ul style="list-style-type: none"> ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] ES Vol 2 Appendix 6-2: Desk Based Assessment [EN010141/DR/6.2] ES Vol 2 Appendix 6-4: Settings Impact Assessment [EN010141/DR/6.2] ES Vol 3 Figure 6-1 to 6-36 [EN010141/DR/6.3] ES Vol 3 Figures 5-5 to 5-87 [EN010141/DR/6.3] Design Approach Document [EN010141/DR/5.6] | | Medium The Applicant has provided an updated assessment of likely impacts and effects on heritage assets as part of the application, which is reported in Chapter 6 of the ES. The assessment includes justification where professional judgement has been used to determine the level of impact and effect. Additional information on the approach to avoiding and minimising impacts (including on views towards the church at Little Staughton) is set out within the Design Approach Document (with particular reference to the evidence on Design Principle 2.1 in Section 5.6 of the Design Approach Document). At this stage the Applicant does not know whether there will ultimately be a difference of professional opinion, but will continue to consult with the affected stakeholders during the pre-examination period once their views are established. |

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| PMI3 | <p>Archaeology:</p> <p>The Applicant has undertaken desk-based research, non-intrusive surveys, and intrusive surveys to establish the archaeological resource across the Order Limits. The investigations during the pre-application phase identified the site of a Roman small town south of Great Staughton, which working with Historic England, the Applicant applied to schedule as a scheduled monument (which was designated by the Secretary of State in September 2024).</p> <p>The Applicant has developed an outline Archaeological Mitigation Strategy (oAMS) as part of the application which sets out specific measures to be adopted in relation to the scheduled monument, and consulted on this with Historic England. Historic England have indicated they agree with the approach proposed in the oAMS, and have advised they expect this to be secured by a Requirement of the draft DCO. Historic England have indicated</p> | <p>Historic England</p> <p>Bedford Borough Council</p> <p>Cambridgeshire County Council</p> | <ul style="list-style-type: none"> ES Vol 1 Chapter 6: Cultural Heritage and Archaeology [EN010141/DR/6.1] ES Vol 2 Appendix 6-5: Archaeological Geophysical Survey Report ES Vol 2 Appendix 6-6 to 6-9: Trial Trench Evaluation Reports [EN010141/DR/6.2] outline Archaeological Mitigation Strategy [EN010141/DR/7.15] outline Heritage Enhancement Strategy [EN010141/DR/7.16] | | <p>High</p> <p>The Applicant has committed to further archaeological investigation post-consent, which is secured by the oAMS.</p> <p>The oAMS has been prepared to include safeguards that the AACs will continue to be refined and agreed with relevant stakeholders (post-consent), which could include the identification of additional AACs, or the removal of currently identified AACs should further investigation determine that the AAC is too broad or no longer required based on the likely level of impact.</p> <p>The Applicant expects that by continuing to work with the County Archaeologists and Historic England during pre-examination, the oAMS will provide appropriate mitigation or offsetting for impacts on archaeology.</p> |

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| | <p>they would raise no objection to the DCO granting scheduled monument consent for the Applicant's proposed works within the extent of the scheduled monument.</p> <p>In relation to the other non-designated archaeology across the site, the Applicant's approach to mitigation is set out in the oAMS which is focused on the conservative identification of 'Areas of Archaeological Constraint' (AACs) where specific mitigation measures will be adopted, such as no-dig solutions. There could be disagreement with the County Archaeologists as to the location, extent, and mitigation measures to be adopted as part of the oAMS for these areas.</p> | | | | |
| PMI4 | <p>Agricultural Land:</p> <p>The Applicant's agricultural land survey has established that the Site includes large areas of best and most versatile (BMV) land.</p> <p>The inclusion of broad areas of BMV land within the Site is likely</p> | Natural England | <ul style="list-style-type: none"> ES Vol 1 Chapter 13: Land and Soils [EN010141/DR/6.1] ES Vol 2 Appendix 13-1: Agricultural Land Classification and Soil Resources [EN010141/DR/6.2] | | <p>Medium</p> <p>The Applicant's assessment of impact on agricultural land and soils is set out in Chapter 13 of the ES. Whilst broad areas of BMV land are included within the development area, the Applicant has set out</p> |

| Ref. | Description of Potential Main Issue (PMI) | Affected Stakeholder(s) | Signposting (to application evidence) | RAG | Likelihood of the issue being resolved during the Examination |
|------|---|-------------------------|--|-----|--|
| | to be a point of contention during the examination. | | <ul style="list-style-type: none"> outline Soil Management Plan [EN010141/DR/7.9] | | <p>justification for their inclusion within the Site, and mitigation measures to protect and manage soils within an outline Soil Management Plan.</p> <p>The Applicant's policy appraisal with respect to agricultural land is set out within Section 7.15 of the Planning Statement.</p> <p>The Applicant notes there is the potential for general disagreement about the appropriateness of development on BMV land.</p> |

