



# EAST PARK ENERGY

**East Park Energy**

EN010141

**Statement of Common Ground**

Cambridgeshire Fire and Rescue Service

**Document Reference: EN010141/DR/8.6**

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Regulation 5(2)(q)

**March 2026**

Version P01

# EAST PARK ENERGY

Planning Act 2008

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

## Statement of Common Ground

### between the Applicant and Cambridgeshire Fire and Rescue Service

|  |   |
|--|---|
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| <b>Author:</b>                                 | Axis PED Ltd / Cambridgeshire Fire and Rescue Service |

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*East Park Energy*

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Statement of Common Ground – Cambridgeshire Fire and Rescue Service  
March 2026  
Version P01

## 1.0 INTRODUCTION

### 1.1 Purpose of this Document

1.1.1 This is a Statement of Common Ground (“SoCG”) made between the following parties:

***BSSL Cambsbed 1 Ltd (hereafter referred to as the ‘Applicant’)***

***and***

***Cambridgeshire Fire and Rescue Service (CFRS)***

1.1.2 The purpose and scope of this SoCG is to identify areas of agreement, areas under discussion and, as appropriate, areas of disagreement, between the parties in respect of the assessment of the Applicant’s proposals.

### 1.2 The Scheme

1.2.1 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.

1.2.2 Subject to the Scheme securing Development Consent in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning.

### 1.3 The Site

1.3.1 The ‘Site’ is located to the north-west of the town of St Neots, and is across

two administrative areas; Bedford Borough Council (BBC) (a unitary authority) and Huntingdonshire District Council (HDC) (a two-tier authority with Cambridgeshire County Council). The Site location is shown on **ES Vol 3 Figure 1-1: Site Location [APP-120]**. The Site area extends to approximately 773 hectares (ha).

1.3.2 With reference to **ES Vol 3 Figure 1-2: Site References [APP-120]**, for ease of reference the Site has been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the National Grid's Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon Substation. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either side of the Pertenhall Brook, with access proposed from the B660 to the east.
- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary, and from Little Staughton Road to the north-west.

- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

1.3.3 With reference to **ES Vol 3 Figure 1-2: Site References [APP-120]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are identified as:

- **Cable Corridor** – Site B to Site C – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor** – Site C to Site D – which connects Site C to Site D across Moor Road and an arable field.
- **Grid Connection** – Site D to Eaton Socon Substation – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

## 1.4 Status of the SoCG

1.4.1 This SoCG is a ‘live’ document that will be updated and amended as the Examination phase progresses. It identifies the matters relating to the Scheme that have been agreed between the parties, the matters under discussion, together with other matters not agreed. It is intended that it will be finalised and signed by the Applicant and CFRS as requested by the Examining Authority during the Examination of the submitted application.

## 1.5 Structure of the SoCG

1.5.1 This SoCG is structured as follows:

- Section 2.0 – provides a summary of consultation undertaken with CFRS; and
- Section 3.0 – sets out whether matters are ‘agreed’, ‘under discussion’, or ‘not agreed’.

1.5.2 A signing sheet between the Applicant and CFRS is provided at Appendix A.

## 2.0 SUMMARY OF CONSULTATION

### 2.1 Summary of Consultation Undertaken

2.1.1 The SoCG has been informed by the meetings summarised in Table 1 below:

**Table 1: Consultation between the Applicant and CFRS**

| Date       | Method of Consultation | Points of Discussion  |
|------------|------------------------|---|
| 9/02/2024  | MS Teams               | <ul style="list-style-type: none"> <li>• Introduction to the Scheme.</li> <li>• Outline Battery Safety Management Plan to be prepared.</li> <li>• CFRS expect NFCC (National Fire Chiefs Council) guidance to be considered.</li> <li>• CFRS to consult with Bedford Fire and Rescue.</li> </ul>                      |
| 15/08/2024 | Email                  | <ul style="list-style-type: none"> <li>• CFRS provided joint response with Bedfordshire Fire and Rescue Service to the statutory consultation.</li> </ul>   |
| 20/08/2025 | MS Teams               | <ul style="list-style-type: none"> <li>• Update on Scheme layout and application documentation.</li> </ul>  |
| 20/08/2025 | Email                  | <ul style="list-style-type: none"> <li>• Applicant provided a range of BESS safety materials for fire service training and education purposes, and a number of BESS destruction testing.</li> <li>• Applicant confirmed that NFCC guidance will be followed, with any deviations to be discussed with CFRS</li> </ul> |
| 03/03/2026 | MS Teams               | <ul style="list-style-type: none"> <li>• Meeting to discuss this Statement of Common Ground as part of the examination of the application.</li> </ul>   |

## 3.0 MATTERS OF AGREEMENT AND DISAGREEMENT

### 3.1 Introduction

3.1.1 The matters covered by the SoCG on which agreement between the parties has been sought include (but are not necessarily limited to) the following matters as requested in Annex F of the Examining Authority's **Rule 6 Letter [PD-005]**:

- Agreement on access routes; • Water volumes for fire fighting; and
- Positioning of BESS.

3.1.2 The matters that have been agreed between the Applicant and CFRS are set out in Table 2.

**Table 2: Position between the Applicant and the CFRS on matters of discussion / consultation**

| Ref.                     | Summary of Matter                                     | CFRS Position   | Applicant Position  | Status               |
|--------------------------|---|---|---|----------------------|
| <b>Topic: The Scheme</b> |   |   |   |                      |
| 001                      | The Applicant's approach to BESS design.              | CFRS request that the enclosure design for the BESS should be a cabinet type system to allow maintenance to take place without entering the BESS, to reduce risk.                         | <p>The Applicant can confirm a cabinet system is likely to be selected. Paragraph 2.2.8 of the <b>oBSMP [APP-162]</b> stipulates safety features that must be integrated in the unlikely event that a walk in design is selected.</p> <p>BESS enclosure design will be fully communicated with CFRS at detailed design and factored into all risk assessments and Emergency Response Plans (ERP).</p> | <b>Matter Agreed</b> |
| 002                      | The Applicant's approach to BESS positioning/spacing. | CFRS request that adequate separation between the BESS enclosures and provision of fire-resistant materials are included in the design to ensure fire does not spread between BESS units. | <p>The Applicant will only select a BESS design where minimum equipment spacing has been validated through Large Scale Fire Testing (LSFT).</p> <p>The <b>oBSMP [APP-162]</b> stipulates these requirements in detail at paragraphs 1.4.3, 2.1.3, 2.2.2, 2.2.3, 2.4.2, 2.4.6, 2.6.11, 2.6.12, 2.7.1, 4.5.2, 5.1.1, 5.1.4, and 5.1.7.</p>  | <b>Matter Agreed</b> |

|     |  |   |  |                      |
|-----|--|---|--|----------------------|
| 003 | The Applicant's approach to batteries. | CFRS note the need for the Applicant to provide details on the style of batteries to be used and the appropriate testing carried out. | The <b>oBSMP [APP-162]</b> confirms that the battery system will be lithium-ion, but full details will not be known until detailed design stage. Battery system details will be promptly shared with CFRS once known and in advance of construction. | <b>Matter Agreed</b> |
|-----|--|---|--|----------------------|

| Ref. | Summary of Matter                                     | CFRS Position   | Applicant Position   | Status               |
|------|---|---|--|----------------------|
| 004  | The Applicant's approach to BESS system requirements. | CFRS note the need for a method of early detection of faults within batteries, and the need for a fire suppression system to prevent a fire spreading to ancillary modules. | <p>The <b>oBSMP [APP-162]</b> confirms in Section 2.6 (Detection and fire protection systems) that detection systems will meet all NFPA 855 and NFCC requirements and be approved by CFRS.</p> <p>The <b>oBSMP [APP-162]</b> also confirms in Section 2.6 how suppression system efficacy will be validated through UL 9540A or 3rd party testing.</p> | <b>Matter Agreed</b> |
| 005  | The Applicant's approach to BESS explosion control.   | CFRS note BESS containers should be fitted with explosion protection or deflagration venting appropriate to the hazard and battery technology deployed.                     | Section 2.7 of the <b>oBSMP [APP-162]</b> confirms that comprehensive explosion prevention and mitigation systems must be integrated into the BESS selected at the detailed design stage. The active and passive control systems will meet NFPA 855 and NFCC requirements and be approved by CFRS prior to construction.                               | <b>Matter Agreed</b> |

| <b>Topic: Traffic and Transport</b>         |  |   |  |                      |
|---|--|---|--|----------------------|
| 006   | The Applicant's approach to site design regarding access for emergency responders. | <p>CFRS request that suitable facilities for safely accessing and egressing the site be provided.</p> <p>Designs should be developed in close liaison with the local fire and rescue service.</p> <p>Firefighters should not have to enter the BESS site and drive through a vapour / gas cloud and so CFRS would prefer an</p> | <p>The Applicant has provided suitable and appropriate access to the BESS.</p> <p>Section 4.2 of the oBSMP [APP-162] provides details of how the Applicant will comply with NFCC guidance and accommodate all CFRS operational requirements for safe emergency response.</p> | <b>Matter Agreed</b> |
| Ref.  | Summary of Matter  | CFRS Position   | Applicant Position   | Status               |
|   |  | alternative access point as per the likely wind direction.  |  |                      |
| <b>Topic: Major Accidents and Disasters</b> |  |   |  |                      |

|     |   |  |  |                      |
|-----|---|--|--|----------------------|
| 007 | The Applicant's approach to providing water supplies for firefighting | CFRS request that the site be supplied with a water supply for fire and rescue services to utilise in the event of an emergency.   | <p>The Applicant has proposed an adequate water supply through the provision of two firefighting water storage tanks of no less than 228,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours.</p> <p>This is set out at paragraph 4.3.3 of the <b>oBSMP [APP-162]</b>, which is secured by Requirement 10 of the <b>draft DCO [AS-008]</b>.</p>  | <b>Matter Agreed</b> |
| 008 | The Applicant's approach to hydrants.                                 | <p>CFRS request any fire hydrants and connections to any dry pipe systems that are required to be installed on the BESS site be installed in accordance with BS 9990 Nonautomatic firefighting systems in buildings code of practice (Current Edition) and should be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition).</p> <p>Fire Hydrants provided should achieve a flow rate of no less than 25 litres / second at any hydrant on the site.</p> | <p>Section 4.3 and paragraph 4.3.5 of the <b>oBSMP [APP-162]</b> confirm that any fire hydrants and connections to dry pipe systems will be installed in accordance with BS 9990. The oBSMP is secured by Requirement 10 of the <b>draft DCO [AS-008]</b>.</p> <p>As set out at paragraph 4.5.6 of the <b>oBSMP [APP-162]</b>, the Applicant has proposed an adequate water supply through the provision of two firefighting water storage tanks of no less than 228,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours. This is the equivalent of at least 31.5 litres per second.</p> | <b>Matter Agreed</b> |

| Ref. | Summary of Matter | CFRS Position | Applicant Position | Status |
|------|-------------------|---------------|--------------------|--------|
|------|-------------------|---------------|--------------------|--------|

|     |  |  |   |                      |
|-----|--|--|---|----------------------|
| 009 | The Applicant's approach to static water supplies.       | CFRS requests that, where a hydrant flow of 25 litres / second cannot be achieved, an equivalent static supply of water on site that will provide for the same flow rate for a duration of 120 minutes should be provided.   | As set out at paragraph 4.5.6 of the <b>oBSMP [APP-162]</b> , the Applicant has proposed an adequate water supply through the provision of two firefighting water storage tanks of no less than 228,000 litres in capacity, capable of delivering 1,900 litres per minute for 4 hours. This is the equivalent of at least 31.5 litres per second.                               | <b>Matter Agreed</b> |
| 010 | The Applicant's approach to vegetation management.       | CFRS request that the site is maintained to prevent a fire spreading elsewhere due to combustible vegetation.<br><br>Areas within 10 metres of BESS units should be kept clear of combustible vegetation and all other vegetation within the curtilage of the site should be kept in a condition such that it does not increase the risk of a fire on the site | The Applicant has integrated this measure into the Scheme. Paragraph 2.4.6 (bullet 5) of the <b>oBSMP [APP-162]</b> confirms that areas within 10m of BESS units will not contain combustible vegetation.   | <b>Matter Agreed</b> |
| 011 | The Applicant's approach to Emergency Response planning. | CFRS request the site operator to develop and share an emergency response plan with the local fire and rescue service point of contact.  | The Applicant's <b>oBSMP [APP-162]</b> commits to the preparation of an emergency response plan as part of the final BSMP.<br><br>Requirement 10 of the <b>draft DCO [AS-008]</b> sets out that the final BSMP must be submitted to and approved by the local planning authority in consultation with Cambridgeshire Fire and Rescue Service prior to commencement of the BESS. | <b>Matter Agreed</b> |

| Ref. | Summary of Matter  | CFRS Position   | Applicant Position  | Status               |
|------|--|---|---|----------------------|
| 012  | The Applicant's approach to environmental impact plans.      | CFRS request that suitable environmental protection measures be provided.   | The Applicant's approach to environmental protection is adequate. The Applicant notes that paragraph 4.5.7 of the <b>oBSMP [APP162]</b> commits to measures to prevent contaminated fire water (or other material) leaving the BESS area in the event of a fire.  | <b>Matter Agreed</b> |
| 013  | The Applicant's approach to emergency planning requirements. | CFRS request that plans be providing showing all sensitive receptors within 1km of the site that may be affected by fire. | <p>The Applicant's <b>oBSMP [APP-162]</b> sets out at paragraph 4.2.8 that the final BSMP must include a site plan that shows all sensitive receptors within a 1 km radius of the Order Limits that could be affected by a fire.</p> <p>The Applicant has prepared a BESS Fire Emissions Modelling Report (Plume Study) at <b>Appendix A of the oBSMP [APP-162]</b> which assesses the battery fire emission impact in the five worst case fire locations (using the concept BESS design) on sensitive receptors within a 1 km radius of the BESS area. This is summarised at paragraphs 4.5.9 to 4.5.12 of the <b>oBSMP [APP-162]</b>.</p> | <b>Matter Agreed</b> |

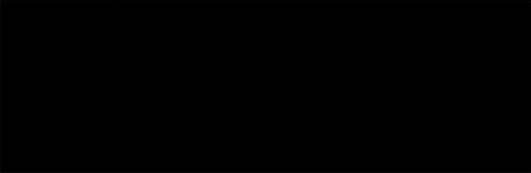
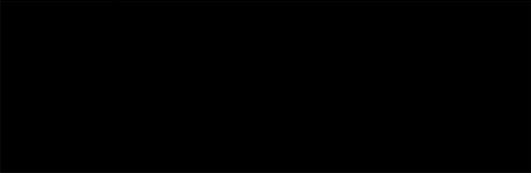
|             |   |   |  |                      |
|-------------|---|---|--|----------------------|
| 014         | The Applicant's approach to consultation. | CFRS suggest the Applicant seek out engagement with local fire and rescue services at an early stage. | <p>The <b>oBSMP [APP-162]</b> commits to engagement with local fire and rescue services at an early stage.</p> <p>Requirement 10 of the <b>draft DCO [AS-008]</b> sets out that a final BSMP must be submitted to and approved by the local planning authority in consultation with Cambridgeshire</p> | <b>Matter Agreed</b> |
| <b>Ref.</b> | <b>Summary of Matter</b>                  | <b>CFRS Position</b>  | <b>Applicant Position</b>  | <b>Status</b>        |
|             |   |   | Fire and Rescue Service prior to commencement of an phase of the BESS.   |                      |



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# APPENDIX A

## BSSL Cambsbed 1 Ltd

Name: Gary Bird  
  
Signature:   
Position: Head Of Project Development

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On behalf of: BSSL Cambsbed 1 Ltd

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Date: 04/03/2026

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## Cambridgeshire Fire and Rescue Service

Name: Jeff Whitlam

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Signature: 

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Position: Group Commander

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On behalf of: Cambridgeshire Fire and Rescue Service

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Date: 06/03/2026

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