



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 2 April 2026
Ref. EPE 23-02405LPA/2.4 STRR
Summary

RELEVANT REPRESENTATIONS (SUMMARY)

Dear Sir/Madam,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141). Response to Examining Authority to submit a Local Impact Report (Summary)

BBC Reference No.: 25/01836/DCO | Examination Ref. FB8D70A75

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: 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... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) [\[REDACTED\]@bedford.gov.uk](mailto:[REDACTED]@bedford.gov.uk) [\[REDACTED\]@bedford.gov.uk](mailto:[REDACTED]@bedford.gov.uk) (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]
[REDACTED]: Head of Planning and Building Control

Date: 2 April 2026

[REDACTED], Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

1. INTRODUCTION

- 1.1 Bedford Borough Council (the ‘Council’) has reviewed the Applicant’s East Park Energy NSIP DCO Application and supporting material (EN 010141) and have submitted Relevant Representations to PINs (14 January 2026) setting out their matters of concerns and requests for clarification. As requested by the Examining Authority (Ref. Rule 6 Letter, Annex D, Item 7 Deadline 1) this report is a summary of the Relevant Representations submitted.
- 1.2 The Summary is solely that of the Council, and not the other Host Authorities. It is submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

2. RELEVANT REPRESENTATION SUMMARY

- 2.1 The ‘Council’ has reviewed the Applicant’s DCO Application and supporting material and note that the Council wish to raise the following by way of the Examination:
- a) Aspect: as currently worded the Applicant’s ‘Scheme description for planning consent’ is not supported as it requires clarity and definition of terminology; and, there is a risk that the Applicant hasn’t discharged their obligations under EIA Regulations Schedule 4 (Information for Inclusion in Environmental Statements): this is identified as a significant material concern;
 - b) Aspect - Public Rights of Way and Bridleway: the Council raises significant concerns and associated matters with this aspect;
 - c) Matters: numerous matters have been identified against the Environmental Statement’s chapter aspects and supporting material. Currently these matters are set out but are given no weighting as it is accepted that some of these will be discussed / addressed as part of the Local Impact Report (LIR) preparation during Examination;
 - d) Where applicable, the Council notes that technical and / or detailed design resolution could potentially be addressed and resolved post consent, subject to agreement with the other Host Authorities; and,
 - e) The Council notes that, as currently drafted, the Council is NOT supportive of [APP-016] Draft Development Consent Order as it requires clarity, definition of terminology, and understanding of powers sought which to date have not been discussed nor agreed with the Host Authorities.
- 2.2 To aid the Examination in attaining agreement between Parties on Matters raised in the Council’s Relevant Representations, the Council sets out the broad position on each Aspect of the Environmental Statement and Application below:
- 1. Executive Summary (to aid reading the Council have kept the same chapter headings as the Environmental Statement).
 - 2. Introduction (as above).

3. **The Scheme (Description) (Aspect 1.1 – 1.6):** it is suggested that this Aspect requires clarification of intent, description of works, and terminology regarding consent sought by the Applicant as this will be critical to the drafting of the [APP-016] DCO Agreement. Currently as tabled, this Aspect is NOT supported and is identified as a significant material concern with the Application.
4. **Alternatives And Design Evolution:** the Council has no comment to make on this Aspect as to raise an aspect objection.
5. **Environmental Impact Assessment Methodology:** the Council has no comment to make on this Aspect as to raise an aspect objection.
6. **Landscape And Landscape Visual Impact Assessment (Matters 6 to 10):** broadly, the Council has raised matters of clarification (e.g. for the operational replacement phase) but the overall conclusion is that, while there is some slight under-representation of significant effects (significant residual landscape effects in Bedford LCA 1B (Riseley Clay & Farmland) and Huntingdonshire Southern Wolds in construction and operation Year 1 have been identified and PRoW users and some residential receptors will experience notable visual impacts), these are of themselves not sufficient as to raise an aspect objection. Overall, no significant landscape effects are assessed for Year 10 or beyond. Mitigation helps but does not eliminate moderate adverse long-term effects.
7. **Glint And Glare (Matter 12):** apart from a minor matter, the Council has no comment to make on this Aspect as to raise an aspect objection.
8. **Cultural Heritage And Archaeology (Matters 13 to 19):** less than substantial harm to several designated heritage assets has been identified with specific concerns regarding to All Saints Church, Little Staughton (Grade I). The archaeological evaluation is incomplete, the mitigation strategy is over-reliant on 'No Dig' solutions and the draft DCO archaeology requirement is not supported. The Council has concluded that these are matters that do require further discussion and resolution between Parties, but these are of themselves not sufficient as to raise an aspect objection.
9. **Ecology And Nature Conservation (Matters 20 to 37):** the Council has raised several survey and / or technical matters that require further work and / or mitigation to address by the Applicant. Concerns remain in respect of: (1) hedgerow removal, insufficient buffers (BBC requests $\geq 8\text{m}$); (2) impacts on ancient woodland and County Wildlife Sites; (3) incomplete species surveys (skylarks, bats, dormouse, otter, water vole, GCN); and, (4) lack of detailed mitigation / compensation strategies. Furthermore, the BNG commitments (70% habitats, 30% hedgerows, 5% watercourses) are high-level only and may not be deliverable or secured. Nonetheless, these matters are of themselves not sufficient as to raise an aspect objection.
10. **Flood Risk, Drainage And Surface Water (Matters 38 to 43):** the Council has raised several technical and management matters that require further work and / or mitigation to by the Applicant. Clarity is required in relation to: (1) the use of culverts and impact on stormwater flows; (2) SuDS for large impermeable areas under solar arrays; (3) emergency containment of contaminated firewater from potential BESS

incidents; and, (4) long-term maintenance of watercourse infrastructure. Nonetheless, these are not matters of themselves sufficient as to raise an aspect objection.

11. **Traffic And Transport** (Matters 44 to 56): the Council has raised several technical and DCO contractual / enforcement matters that require further work and / or mitigation to address by the Applicant, but these are of themselves not sufficient as to raise an aspect objection.
12. **Public Rights Of Way And Bridleways** (Matters 57 to 66): the Council has raised several in-principle, technical and DCO contractual matters that requires further work and / or mitigation to address by the Applicant. Key concerns include: (1) undefined corridor widths (BBC requests 8m footpaths / 9m bridleways); (2) opposition to PRoW being used for construction or maintenance vehicle access; (3) lack of detail on diversions, permissive routes, reinstatement, legal status; and, (4) safety concerns for walkers, cyclists, equestrians. Currently as tabled, this Aspect and the wording of the draft DCO is NOT supported by the Council and is identified as a significant material concern to the Application.
13. **Noise And Vibration** (Matters 67 to 72): consideration of traffic noise and plant and machinery impacts should be given to the operational (replacement) and decommissioning phases as well as construction and operational phases. The operational noise impacts from the Proposed Development are considered to represent a neutral to minor level of effect in terms of EIA and therefore not considered to be significant. Matters require further work and / or address by the Applicant, but these are of themselves not sufficient as to raise an aspect objection.
14. **Air Quality (Dust)** (Matters 73 to 74): the Council has raised several technical and management matters that require further work and / or address by the Applicant, but these are of themselves not sufficient as to raise an aspect objection.
15. **Ground Conditions (Land and Water Contamination)** (Matters 75 to 79): the Council opposes cabling being left underground post-decommissioning due to its contamination risk. The Council expects full removal of underground infrastructure at decommissioning.
16. **Land And Soils** (Matters 80 to 84): the Council has raised several technical and management matters that require further work and / or address by the Applicant (e.g. there is missing Agricultural Land Classification for 5.4% of the application site and the approach to soil health and restoration is disputed), but these are of themselves not sufficient as to raise an aspect objection.
17. **Socio-Economics, Land-Use And Tourism** (Matters 85 to 89): the Council identifies that the construction phase benefits the local economy moderately but that regional benefits are considered to be minor. Tourism effects are further considered to be negligible albeit not fully assessed. The Council has no further comment to make as to raise an aspect objection.
18. **Climate Change** (Matters 90 to 93): the Council has concluded that there are Aspect matters that do require further discussion and resolution between Parties (e.g. relating to concerns that there is an inadequate lifecycle assessment of materials and

waste, including solar panels, BESS units and cabling), but these are of themselves not sufficient as to raise an aspect objection.

19. **Other Environmental Matters** (Matters 94 to 97): the Council has raised several in-principle, technical and management matters that requires further work and / or mitigation to address by the Applicant. In light of the absence of a Health chapter in the ES or submission of a Health Impact Assessment, which the Council would like to have seen, information is required justifying that there will be no impacts (reference to be made to any mitigation measures as appropriate). Currently as tabled, the Council reserves the right to comment further on these matters during the Examination.
20. **DCO Agreement [APP-016]** (Matter 100): the Council is currently **NOT** supportive of the Draft Development Consent Order - this requires clarification particularly in terms of the Proposed Development's description, terminology, detailed resolution of matters, and understanding of agreed powers.
21. **Cumulative and In-Combination Effects** (Matter 102): other than as set out, the Council has no comment to make on this Aspect as to raise an aspect objection.

3. OVERALL CONCLUSION

Bedford Borough Council concludes that two Aspects and numerous Matters remain unresolved. Therefore, the Council cannot support the Draft DCO and requires further substantial clarification, supporting evidence and amendments during the Examination. On this basis, the Council reserves the rights to raise further matters should they arise during the course of the Examination.

PD.QA/5pg