

| | | |
|--|--|--|
| REPORT 1: RELEVANT REPRESENTATION (Date: 14.01.2026) 1.1 Pre-application Issues Tracker (work-in-progress) 1.2 Potential Main Issues for the Examination (marked as Red) | Red (High Risk): Fundamental issues with the assessment, methodology, or scheme that are unresolved and could significantly impact the Examination or delay the decision. (BBC Red: read as a 'Significant Material Consideration') Amber (Medium Risk): Outstanding issues where disagreement exists with statutory bodies/ Host Authorities (e.g., Natural England, EA), but a resolution is identified/ can be attained. Green (Low Risk): Issues that are considered resolved or agreed upon with relevant stakeholders. (BBC Green: matter can be resolved at/ post Examination) | REPORT 2: LOCAL IMPACT REPORT (Local Perspective; Examination/ April) Content: Detailed local knowledge; assessment of effect/ impact; mitigation of local concerns (Ref. Environmental Impact Assessment (EIA) process) |
|--|--|--|

| ES Aspect (Chp) | Matter No. | Matter (Description of Matter/ issue) | IDENTIFICATION OF ASPECTS & MATTERS | | | Resolution 1 (likelihood of the issue being resolved during/ post Examination) | Local Plan Policy Ref. | EIA ASSESSMENT & GRADING OF IMPACT | | | | | | LIR | Comment (For in-house only) |
|-----------------|------------|---------------------------------------|--|---|-----|--|------------------------|---|---|--|--|--|------------------------------------|-----|-----------------------------|
| | | | Affected Parties (stakeholder(s)/ in-house discipline) | Signposting (to Application's evidence/ Ref.) | RAG | | | Magnitude/ Intensity (Significant/ High/ Medium/ Low) | Extent/ Scale (Sub-regional/ Host Authority/ Local/ Isolated) | Duration/ Moment (permanent/ long/ medium/ short-term) | Reversibility (irreversible/ reversible) | Frequency (continuous/ periodic/ intermittent) | Mitigability (reduced/ eliminated) | | |

| | | | | | | | | | | | | | | |
|--|----|---|-------------------------------------|---|-----------|--------|--|-------------|--------------|-------------|--------------|------------|------------|--|
| Chp.1: Introduction | 0 | No comment | | | drop-down | | These are all drop-down cells | | | | | | | |
| Chp.2: The Scheme | A1 | Aspect 1.1: 'Principal', 'Associated', and 'Authorised' Development; Order Limits; Work Packages; limits of deviation - flexibility: - define | Host Authorities, Statutory Parties | APP-002(pg5 Consent Flexibility); APP-016(DCO); APP-017(Memo); APP-031(1.4.1; 4.2.3; 4.5 Design Flex); APP-037 (1.6.6) | | During | Heads of Terms | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Contractual issue (can be resolved within the DCO Agreement, s106, s278 et al; and related Management Plans) |
| | | Aspect 1.2: full extent of works (ES Chp.2 The Scheme: Order Limits; Design Principles; Work Packages; 'ancillary development': - define | Host Authorities, Statutory Parties | APP-038 (2.1.3 Description; 2.2; 2.3; 2.4.3; 2.4.6; 2.4.8; 2.4.175; | | During | Heads of Terms | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Contractual issue (see above) |
| | | Aspect 1.3: 'Work Packages' / 'Works Plan' / 'Works': - define | Host Authorities, Statutory Parties | APP-016, APP-017, APP-038: as ref above | | During | Heads of Terms | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Contractual issue (see above) |
| | | Aspect 1.4: 'Order Limits' + 'adjacent land': - define | Host Authorities, Statutory Parties | APP-009 (Plan Key); APP-016 | | During | Heads of Terms | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Contractual issue (see above) |
| | | Aspect 1.5: 'Temporary': - define | Host Authorities, Statutory Parties | APP-016(Part 1 Interpretation etal); APP-017(Glossary); APP-037(1.2.3) | | During | Heads of Terms | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Contractual issue (see above) |
| | | Aspect 1.6: NSIP (flexibility): - incorporate S15(3B) | Host Authorities, Statutory Parties | Planning Act Section 15(3B) | | During | Heads of Terms | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Contractual issue (see above) |
| Matter No. > | M1 | Local Policy 3S (control on type of development): - address policy | Bedford Borough Council | APP-032(7.1.1;T1) | | During | General: LP3s Spatial strategy LP28S Place making (i-vii, viii) LP29 Design quality and principles | Low | Local | Short-term | Reversible | Periodic | Eliminated | (Minor) DM: technical matter that, with address by Applicant, can be resolved/ agreed between Parties |
| | 2 | Operational (replacement) Phase: - impact of sub-phase needs to be addressed in ES/ Scheme | Host Authorities, Statutory Parties | BBC PEIR 2024; APP-038 (2.6; T2-35; 2.6.6); APP-157 (oOEMP) | | During | | Significant | Host | Long-term | Reversible | Periodic | Eliminated | Effect/ harm as then identified to be mitigated through DCO Agreement and associated |
| | 3 | Access: - needs to be addressed in ES/ Scheme & - | Host Authorities, Statutory Parties | BBC PEIR 2024; PINs Scoping ID.2.1.9; APP-159 (oLEMP) | | During | | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Will need address/ review in ES, potentially additional plans to evidence Phase, and then |
| | 4 | Manufacture, replacement, decommissioning, recycling: - address/ harm/ concerns | Host Authorities, Statutory Parties | EIA Regs s4(5); WEEER 2013; BBC PEIR 2024; APP-038 (2.7.1); APP-158 (oOEMP; 2.4.2; T5.12 pg48) | | During | LP49 Waste (i-iv) | Significant | Sub-regional | Long-term | Irreversible | Continuous | Eliminated | Requires a comprehensive Waste Management Strategy. While we note Rule 6 Letter annex F(9) Statement, this has the potential to remain a long- |
| Chp.3: Alternatives and Design Evolution | 5 | BESS location: environmental pollution risk (Lithium) + waste management wrt design & locational decisions: - address | Host Authorities, Statutory Parties | APP-034 (4.3.27-32; 5.6.104 - Red Flag); APP-165 (oSWMP; 6.1.3; 6.4; 6.5.6) | | During | LP56 Renewable energy - broad locations (+ Fig. 13) LP57 Renewable energy general impact (i-vi, xi-xv) | Significant | Sub-regional | Long-term | Irreversible | Continuous | Eliminated | Effect/ harm as then identified to be mitigated through DCO Agreement and associated Management Plans |
| Chp.4: Environmental Impact Assessment Methodology | | No comment | | | | | | | | | | | na | |
| Chp.5: Landscape and LVIA | 6 | Site boundary/ Public Highways/ RedLine: - confirm/set 10m as minimum to all screen planting width; PRoW; Permissive Footpaths; water courses | Host Authorities | BBC Scoping (2023); APP-121 (MP); APP-159(oLEMP; 3.4.1) | | During | LP37 Landscape character (i-vi) | Significant | Host | Long-term | Reversible | Continuous | Eliminated | Address through reviewed ES - a) RedLine procedural; b) landscape mitigation |
| | 7 | Landscape establishment (Months 2 to 30): period too extensive; phased implementation; operational (replacement) phase: - address | Host Authorities | BBC PEIR 2024; APP-038 (2.5.4vm); APP-159 (oLEMP; 6.4; 6.5) | | During | LP38 Landscape in new development (i-viii) | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address through revised LEMP/ other Management Plans regarding Programme |
| | 8 | Vegetation clearance: CEMP (replacement phase; vis displays; temp haul roads): harm/ replacement/ haul routes (operational phase): - address | Host Authorities | BBC PEIR 2024; APP-045(9.7); APP-101 (4.6; AnnexB); APP-155(oOEMP; 2.4.6; T5.3); APP-157 (oOEMP; 2.4.16); APP-158 (oDCMP; 2.5); APP-159 (oLEMP) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address through revised LEMP/ other Management Plans regarding Programme |
| | 9 | Employment: 3No. Full Time Employment (Landscape): - define commitment 40Yrs | Host Authorities | BBC PEIR 2024; APP-159(oLEMP; 4.1); APP-016 | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address through revised LEMP/ other Management Plans regarding Programme & DCO Agreement |
| | 10 | LVIA: impact at operational (replacement) phase: - impact(s) not referenced | Host Authorities | APP-041 (5.1.3) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Effect/ harm as then identified to be mitigated through DCO Agreement and associated |
| | 11 | Legacy: status of all landscape works, PRoW post decommissioning phase: - assessment against planning benefit, weight and balance | Host Authorities | APP-034 (Principle 7, pg57); APP-159(oOEMP; Chp.7) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Reduced | Nature of development wrt temporary landscape mitigation needs discussion/ clarity |
| Glint & Glare | 12 | Airfields: Thurlough Airfield (Bedford Aerodrome) and Little Staughton Airfield: reference | Bedford Borough Council | BBC Scoping (2023); APP-074 (Vol2 Part1 T5.4) | | During | LP41S Historic environment and heritage assets (i, ii, iv, viii) | High | Local | Long-term | Irreversible | Continuous | Reduced | To be addressed in ES review + assessment |
| Chp.6: Cultural Heritage and Archaeology | 13 | All Saints Church: setting impacts: - screening etal mitigation measures required | Bedford Borough Council | BBC PEIR (2024); APP-028(pg35-7); APP-042(6.8.56-62); APP-083(pg74); APP-138; APP-139 | | During | | High | Local | Medium-term | Reversible | Continuous | Eliminated | With additional landscape, harm can be mitigated and over time (10Y+) be eliminated |
| | 14 | Mitigation measures: unidentified remains (as per East of England Regional Research Framework): - address in APP-166 (oAMS) other MP | Bedford Borough Council | APP-042(6.6.4; Tables) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Potential for long-terms archaeology strategy to preserve finds & educational interest (caveated re post decommissioning phase) |
| | 15 | Evaluation trenching: first phase & additional trenching: - address in APP-166 (oAMS) other MP | Bedford Borough Council | APP-042(6.3.6iii; 6.5.7); APP-166 (oAMS) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Potential for long-terms archaeology strategy to preserve finds & educational interest (caveated re post decommissioning phase) |
| | 16 | Outline Mitigation Strategy 1: No Dig solutions to actually involve some excavation: - address in APP-166 (oAMS) other MP | Bedford Borough Council | APP-166(6.1.4 T1) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Potential for long-terms archaeology strategy to preserve finds & educational interest (caveated re post decommissioning phase) |
| | 17 | Operational & Operational (replacement) Phase: archaeology monitoring: - address in APP-166 (oAMS) other MP | Host Authorities | APP-158(oOEMP; T5.2b); APP-166(7.4; 7.5) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Potential for long-terms archaeology strategy to preserve finds & educational interest (caveated re post decommissioning phase) |
| | 18 | Ladder Settlement in Site B (Asset 275): possible further intrusive investigation proposed: - address in APP-166 (oAMS) other MP | Bedford Borough Council | APP-167(4.4) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Potential for long-terms archaeology strategy to preserve finds & educational interest (caveated re post decommissioning phase) |
| | 19 | (DCO) Archaeology requirement: DCO as drafted not supported | Host Authorities | APP-016(DCO) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Potential for long-terms archaeology strategy to preserve finds & educational interest (caveated re post decommissioning phase) |
| Chp.7: Ecology and Nature Conservation | 20 | Hedgerow Regulations (1997) and Inclosure Act (1845): - concerns regarding reference and protection; op(replace) phase | Host Authorities, Statutory Parties | BBC Scoping (2023); PINs (ID3.2.4); APP-012; APP-016(Interpretation); APP-017 (Schedule 12) | | During | LP40 Hedgerows | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Hedgerow protection requirements set-out in LEMP Management Plan (caveated re post decommissioning phase) |
| | 21 | Cable corridor (25m width vs 6m Hedgerow gaps): - clarification | Host Authorities | BBC PEIR (2024); APP-038(2.4.98) | | During | LP40 Hedgerows | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Subject to Applicant agreeing to Council's position |
| | 22 | Visibility displays: harm to existing/ historic hedgerows: - suggest consolidation with Matter 8 | Host Authorities | BBC PEIR 2024; APP-045(9.7); APP-101 (4.6; AnnexB); APP-155(oOEMP; 2.4.6; T5.3); APP-157 (oOEMP; 2.4.16); APP-158 (oDCMP; 2.5); APP-159 (oLEMP) | | | | na | na | na | na | na | na | Matter 8 |
| Protected and/or Notable Species | 23 | County Wildlife Site: harm/ insufficient information (say hydrology, coppicing) to verify the Applicant's conclusion: address | Bedford Borough Council | APP-031(3.2.10; 7.6.33); APP-043(T7.11) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | CWS protection to be secured through the relevant Management Plan(s) |
| | 24 | Skylark mitigation: harm/ insufficient detail/ land to be set aside/ conclusion in [APP-043] para 7.8.118 not supported: - address | Host Authorities | APP-043(7.8.112 - 118); APP-159(oLEMP; 6.2.9 - 10; 6.5.45) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Create long-term protected Skylark breeding grounds (caveated re post decommissioning phase) |
| | 25 | Roosting bats: was scoped out subject to mitigation measures to be agreed: APP-157(oOEMP); APP-158 (oOEMP); APP-159 (oLEMP) address | Host Authorities | APP-043(S7.7; 7.7.20-23); APP-155 (oOEMP); APP-159 (oLEMP; T5.3) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) |

REPORT 3: STATEMENT OF COMMON GROUND etal

3.1 Pre-application Principal Areas of Disagreement Summary Statements (PADSS) and/or
 3.2 Statement of Common Ground (SoCG)
 3.3 Potential Main Issues for the Examination (PMIE) statement

| | | | | | | | | | | | | | | | | |
|---|---|---|---|---|-------------------------------|--------|--|---|-------------|--------------|--------------|------------|------------|---|--|---|
| Chp.8: Flood Risk, Drainage and Surface Water | 26 | Hazel dormouse: data search no record; absence of a survey; precautionary method of works - draw through to MPs (as above) | Host Authorities | APP-043(7.6.74-77); APP-159(oLEMP; 2.6.23) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 27 | Water vole and otter: baseline surveys: - draw through to MPs (as above) | Host Authorities | APP-043(7.6.72); APP-096(survey); APP-155(oCEMP; T5.3); APP-159 (oLEMP; S5; 6.4.8-13); | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 28 | Great crested newt: potential harm location P46: - survey at phases; no mention in Management Plans | Host Authorities | APP-043(7.8.58; 7.12.2); APP-095(survey); APP-155(oCEMP) APP-157(oCEMP) APP-159 (oLEMP) - no mention | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 29 | Cross-reference on commitments. APP-043 pg7-21: 'Priority habitats have been scoped into assessment at construction and operation. Decommissioning impacts are considered comparable with those experienced during construction'. Statement of significant concern -no approach/ statement regarding op(replace)phase ecological surveys, temp haul routes, habitat harm; mitigation measures etc.: - needs address | Host Authorities | APP-016(DCO); APP-043; APP-154; APP-159 (oLEMP); APP-155 (oCEMP); APP-159 (oLEMP; plans) | | During | LP42S Protecting biodiversity and geodiversity LP43 Enhancing biodiversity (i-iii) | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | | |
| | 30 | Planting selection and habitat creation: final species list (woodland, hedgerow, understorey, river course planting): LPA approval | Host Authorities | APP-091(T3.4); APP-121(Masterplans); APP-159 (oLEMP; 3.5, 3.6, T1) | | During | LP40 Hedgerows | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Indigenous plant selection | |
| | 31 | Decommissioned planting: revert to landowner post 40Y; concern regarding established habitats created could be removed: clarification (see 'temporary'; 'planning benefits'; legacy) | Host Authorities | APP-016 (DCO); APP-038(2.7); APP-159(oLEMP; Chp7); et al | | During | LP40 Hedgerows | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 32 | Landscape widths: some set at 6m; others in relation to water vole at 10m; etc: - suggest consolidation with Matter 6 | Host Authorities | BBC Scoping (2023); APP-121(Masterplans); APP-159(oLEMP; 3.4.1) | na | | | na | na | na | na | na | na | na | Matter 6 | |
| | 33 | Grassland establishment: high nutrient levels, methods to reduce soil fertility (e.g. soil inversion); v. passive approach; remedial action?: - method address | Host Authorities | APP-121(Masterplans); APP-159(oLEMP; 6.2.8; 6.2.11; 8.3.8-9); APP_161(oSMP; not addressed) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 34 | Veteran/ Ancient/ Listed trees: protection and RPZ measures: - address across Management Plans | Host Authorities | APP-155 (oCEMP); APP-0157(OOEMP); APP-159 (oLEMP); no mention | | During | LP39 Retention of trees (I-v) | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 35 | Monitoring strategy/ ManPlan: consideration of species and wider ecosystem characteristics rather than just to attain BNG: - address | Host Authorities | APP-159(S8); APP-168(BNG; 5.2.1 % gains) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Monitoring landscape and BNG targets through long-term Management Plans (caveated re post decommissioning phase) | |
| | BNG | 40-year landscape management; staffing, implemented over operational phase; monitoring; failure?: - requires detailed resolution | Host Authorities | BBC Scoping (2023); APP-157(oCEMP); APP-159(OLEMP); APP-161(OSMP); APP-168(BNG) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Protection of habitat and address through long-term Management Plans (caveated re post decommissioning phase) | |
| | 37 | Biodiversity Net Gain (also see Matter 36 above): - resolution/ commitments within DCO Agreement | Host Authorities | APP-168(BNG); APP-016(DCO; no ref) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Monitoring landscape and BNG targets through long-term Management Plans (caveated re post decommissioning phase) | |
| | 38 | Culverts: all phase in-use; stormwater management & capacity; hydraulic calculations: - requires detailed address. It would assist reading if the following were illustrated on one plan including temporary haul routes - APP-015(Hedgerow Plan) APP-123(Indicative Watercourse Crossing Plan) APP-126 (Indicative Vegetation Clearance Plan) | Host Authorities | Applicant PEIR; APP-038(T2.21); APP-100(1.4.5); APP-123(Plans) | | During | LP92 Flood risk (ii-iv) LP93 Sustainable drainage systems (SUDs) (i-vii) | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Management of water courses | |
| | 39 | Infiltration Testing: detailed design resolution (post-consent) -SUDs storage: - other mitigation measures possible. Note this is NOT read against the BESS contaminated water storage matter | Host Authorities | APP-165 (oSUMP; 6.4; T6) | | Post | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Management of water courses | |
| | 40 | Catchment runoff rates: cross-catchment flows: - address | Host Authorities | APP-098(4.4.1); APP-165(oSUMP; Chp6) | | Post | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Management of water courses | |
| | 41 | Solar Panels: drainage and potential for erosion from runoff; SUDs storage; infiltration: - discussion topic | Host Authorities | APP-159; APP-165(oSUMP; 6.5.1) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Management of water courses | |
| | 42 | Watercourse consent LLFA: - not supportive of DCO Schedule/ wording | Bedford Borough Council & CCC | APP-016(DCO) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Protective Provisions | |
| | 43 | Surface water drainage: detailed design stage post-consent: - IPA discussion and consenting requirement | Host Authorities | APP-165 (oSUMP) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Management of water courses | |
| | Chp.9: Traffic and Transport | 44 | Public Highways: proposed cable route across Public Highways: s106/278 consent with LPA | Host Authorities | BBC PEIR (2024); APP-016(DCO) | | During | LP31 The impact of development access impacts (i-iv) LP88 Impact of transport on people, places and environment (i-vi) | Significant | Host | Long-term | Reversible | Periodic | Eliminated | | Public Highways (s106) & Protective Provision |
| | 45 | Underground infrastructure contamination: underground ducting and cables left in-situ: - discussion; in principle, Council NOT supportive | Host Authorities | EIA Regs s4(5); WEEER 2013; BBC PEIR 2024; APP-038 (2.7.1); APP-158 (oDEMP; 2.4.2; T5.12 pg48) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Council position is for total removal | |
| | 46 | Public Highway condition surveys; plans similar to APP-10/11 for all phases required; commitment in DCO: - address | Host Authorities | BBC PEIR (2024); APP-010; APP-011; APP-016(DCO) | | During | | Significant | Host | Long-term | Reversible | Periodic | Eliminated | | Public Highways (s106) & Protective Provision | |
| | 47 | General (Public Highways): details of the visibility splays at the numerous site access points, temporary signage and traffic signals, etc: - suggest consolidation with Matter 8/ over-arching assessment | Host Authorities | BBC PEIR 2024; APP-045(9.7); APP-101 (4.6; AnnexB); APP-155(oCEMP; 2.4.6; T5.3); APP-157 (oCEMP; 2.4.16); APP-158 (oDCMP; 2.5); APP-159 (oLEMP) | | During | | Significant | Host | Long-term | Reversible | Periodic | Eliminated | | Public Highways (s106) & Protective Provision | |
| | 48 | Travel Plan, Construction Staff Travel Plan: - address | Host Authorities | BBC PEIR (2024); APP-156(oCTMP; 4.5.3; 4.5.4); APP-016 | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Travel Plan MP; + Travel Plan Monitoring Fee | |
| | 49 | Construction Activity: on-site, off-site travel, construction movement between the sites: - understand in relation to hedgerows, culverts, etal | Host Authorities | BBC PEIR (2024); PINs Scoping (ID2.1.9); APP-101(3.3.1; 4.1.4; 4.8.2; 5.8.2); APP-102(Plans) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | | Travel Plan MP | |
| | 50 | Visibility splays (inter alia SA14 to 20): DMRB should be used to determine visibility splays wrt road speed: - suggest consolidation with Matter 8 | Host Authorities | APP-045; APP-101; APP-102; APP-124; APP-125; APP-126; APP-156 | na | | | na | na | na | na | na | na | na | Matter 8 | |
| | 51 | Highway modeling links: no junction counts were conducted, and no junction assessments were carried out: required as part of Transport Assessment | Host Authorities | APP-045 (T9.pg.9-34) | | During | | Significant | Host | Short-term | Irreversible | Periodic | Eliminated | | Surveys | |
| | 52 | Minibus service: clear commitment provided... if occupancy is below that assumed for the assessment: - suggest consolidation with Matter 48 | Host Authorities | APP-101(9.7.12-15); APP-156(oCTMP; 4.5.4) | na | | | na | na | na | na | na | na | na | Matter 48 | |
| | 53 | Vehicle tracking: outside real-time boundary: - review swept path analysis: - suggest consolidation with Matter 8 | Host Authorities | APP-045 (T9.4 pg.9-31) | na | | | na | na | na | na | na | na | na | Matter 8 and 50 | |
| | 54 | Vehicle tracking: Great Staughton Road/ Little Staughton Road junction: - review swept path analysis | Host Authorities | APP-101 (Annex C Fig.C5) | na | | | na | na | na | na | na | na | na | Matter 8 and 50 | |
| | 55 | Stage 1 Road Safety Audits (RSAs): - not provided | Host Authorities | APP-045 (none) | | During | | Significant | Host | Short-term | Irreversible | Periodic | Eliminated | | RSA1 | |
| 56 | DCO (Highways) requirement: - DCO as drafted not supported | Host Authorities | APP-016 (DCO) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Public Highways (s106) & Protective Provision | | |
| Public Rights of Way and Bridleways (PRoW) | 57 | Technical specification: minimum PRoW corridor width set at 8m for footpaths and 9m for bridleways: - to be clarified | Bedford Borough Council | APP-045(9.7.17); APP-160(6.4.2; 7.1.3; etal); APP-016(DCO) | | During | LP91 Access to the countryside (i-ix) Rights of Way Improvement Plan 2018-2023 (2018) | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Creation of a PRoW network (caveated re post decommissioning phase) | |
| 58 | Operational phase activity, movement of possible vehicle staff on/ across site, on-site haul routes: - suggest consolidation with Matter 38 | Host Authorities | BBC Scoping (2023); APP-045(T9.1; T9.3 pg9-33/35; 9.4.5) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Creation of a PRoW network (caveated re post decommissioning phase) | | |
| 59 | PRoW public access: the public are not inconvenienced in their access and use of PROW; safety: - review with haul routes/ vehicle use of PROW | Host Authorities | BBC PEIR (2024); APP-016(13.2); APP-121(Masterplan); APP-160(oPRoWMP; 5.1.2) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Creation of a PRoW network (caveated re post decommissioning phase) | | |
| 60 | PRoW Access: vehicle use in the construction, operational (replacement) phase; APP-010 permanent use of motor vehicles over public rights of way; APP-045 'negligible impact': - in principle not supported | Host Authorities | BBC PEIR (2024); APP-010(Plans); APP-045(9.4.14; 9.7.16-18; 9.8.60; T9.19); APP-050(14.6.19; 14.8.17); APP-101(3.7.3); APP-160(oPRoWMP; T1); APP-016(DCO) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | | Creation of a PRoW network (caveated re post decommissioning phase) | | |

| | | | | | | | | | | | | | | |
|--|-----|--|---|---|----|--------|---|-------------|-------------|--------------|--------------|------------|--|---|
| Chp.10: Noise and Vibration | 61 | Construction, operational, decom phase access;PRoWs and permissive routes/pathways green corridor; damage and maintenance: - address in management plan 40Y | Host Authorities | BBC PEIR (2024); PINs Scoping (ID3.8.1.6); APP-160(oPRoWMP; 7.0); APP-016 | | During | LP32 The impact of development disturbance pollution (i-vi) | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Creation of a PRoW network (caveated re post decommissioning phase) |
| | 62 | PRoW corridors and permissive pathways; hard technical specification & maintenance 40Y; maintenance spec: - address in PRoWMP | Host Authorities | BBC PEIR (2024); APP-160(oPRoWMP; 7.1.6) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Creation of a PRoW network (caveated re post decommissioning phase) |
| | 63 | PRoW Network: comprehensive network needs to be resolved: - discussion | Host Authorities | APP-010; APP-160 (oPRoWMP) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Creation of a PRoW network (caveated re post decommissioning phase) |
| | 64 | PRoW general requirements/ approach: - suggest consolidation with Matter 63 | Host Authorities | APP-010; APP-160 (oPRoWMP) | na | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Creation of a PRoW network (caveated re post decommissioning phase) |
| | 65 | Permissive pathways and PRoW network; temporary benefit; status post decommissioning; planning weight: - discussion | Host Authorities | APP-031(4.9.3; 7.4.21; 7.20.10) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Creation of a PRoW network (caveated re post decommissioning phase) |
| | 66 | (DCO) PRoW requirement: - DCO as drafted not supported | Bedford Borough Council | APP-016(S4; S6; S7) | | During | | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Creation of a PRoW network (caveated re post decommissioning phase) |
| | 67 | Operational (replacement) and decommissioning phase, traffic noise and plant and machinery: - address in MP approach | Host Authorities | BBC Scoping (2023); PINs (ID3.6.1; 3.6.3); APP-046(10.5.5); APP-158(oDEMP) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | Address via Management Plan |
| | 68 | Noise monitoring locations: the Council seeks written confirmation | Bedford Borough Council | BBC PEIR (2024); PINs (ID3.6.8); APP-046 (T10.6) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | Address via Management Plan |
| | 69 | Outline CEMP, hours of working, Building Regulations matter: - reference statement | Host Authorities | APP-155(4.1.2) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | Address via Management Plan |
| | 70 | Outline Operational EMP, of BS 4142 or equivalent standard: - address | Host Authorities | APP-157 (T5.5) | | During | | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | Address via Management Plan |
| Chp.11: Air Quality | 71 | Standards and Regulations, equivalent standard: address | Host Authorities | APP-016 (DCO) | | During | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | Address via Management Plan | |
| | 72 | Outline Operational EMP: relevant BS needs to apply: - address | Host Authorities | APP-157 (T5.6) | | During | Significant | Host | Long-term | Irreversible | Periodic | Eliminated | Address via Management Plan | |
| | 73 | Air Quality, CEMP to include Construction Dust Management Plan (CDMP), applicable to all phases: - review/ discussion | Host Authorities | APP-047(11.7 BBC;11.4.19); APP-155 (oCEMP; AA) | | During | Significant | Host | Medium-term | Irreversible | Periodic | Eliminated | Address via Management Plan | |
| Chp.12: Ground Conditions (Land and Water Contamination) | 74 | Dust mitigation, mitigation measures... during dry months: - address | Host Authorities | APP-157 (T5.7) | | During | Significant | Host | Medium-term | Irreversible | Periodic | Eliminated | Address via Management Plan | |
| | 75 | Pollution leaching, Environmental Incident Management and Pollution Prevention Plan: - address | Host Authorities; EA; LLFA | BBC Scoping (2023); PINs Scoping (ID3.3.2; 3.4.4; 3.4.5); APP-048(12.7.3); APP-157; APP-158(T5.8) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address via Management Plan | |
| | 76 | BESS Firewater, breach of ponds, mitigation strategy, ecological & watercourse harm; insurance: - address | Host Authorities; EA; LLFA | BBC PEIR (2024); PINs (ID3.4.4; 2.12.2); APP-162(oBSMP) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | BESS Firewater | |
| | 77 | Insurances, BESS fire risk & environmental contamination: - reference statement | Applicant; EA; LLFA | BBC PEIR (2024) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Clarification only | |
| Chp.13: Land and Soils | 78 | Waste: life-cycle recycling and carbon footprint; export such waste to land-fill: - suggest consolidation with Matter 4 | Host Authorities; EA; LLFA | BBC Scoping (2023); PINs Scoping (ID3.12.3; 3.12.5); APP-038(T2-35; 2.6.3) | na | | na | na | na | na | na | na | Matter 4 | |
| | 79 | Ground Condition report, contamination watching brief, Environmental Incident Management and Pollution Prevention Plan (EIMP) within CEMP, all phases: - address within management plans | Host Authorities; EA; LLFA | APP-048(12.7.4); APP-157(oCEMP; 1.3.3; 4.1.28; T5.4); APP-158(oDEMP; T5.8) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address via Management Plan | |
| | 80 | 'Agrisolar research area', part of DCO Agreement 40yrs: address | Host Authorities | APP-038(W10; T2-33); APP-161(no mention) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Soil research | |
| | 81 | Soil data collection, Natural England guidance Technical Information Note (TIN049): - discussion | Host Authorities; NE | APP-049(T13.3; 13.3.5) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Soil research | |
| | 82 | Biomass/ agricultural production, permanent adverse impact: - review and address | Host Authorities | APP-049(13.4.12; T13.5; 13.6); APP-159(oLEMP; T13.12; T13.5) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Biomass (food security) impact to be weighed against energy security | |
| Chp.14: Socio-Economics, Land Use and Tourism | 83 | Assessment of residual effects, receptors: - review and address | Host Authorities | APP-049(13.10; T13.15); APP-161 (oSMP) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address via Management Plan | |
| | 84 | Soil resources: magnitude and sensitivity criteria ...beneficial effect is likely to be overstated; temporary: - address | Host Authorities | APP-049(13.12.2; 13.12.4) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Address via Management Plan | |
| | 85 | Scoping Opinion, various matters identified still remain outstanding: - see AECOM Report | Host Authorities | PINs Scoping (ID3.7.1-7) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | 85 to 89: potential long-term marginal positive impact; hold as neutral impact | |
| | 86 | Local employment benefit, which effects constitute a local and which constitute a regional level (30/90minute, 500m/2km): - address | Host Authorities | APP-050 (NPS EN1 -T14.1; 14.4.6); APP-163(oSSCEP) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | 85 to 89: potential long-term marginal positive impact; hold as neutral impact | |
| | 87 | Tourism: assessment of impacts on all users of PRoWs and Bridleways, residential use impact, APP-160(14.4.3) The Scheme has the potential to have a range of temporary and longer-term effects: - clarify/address/ comment | Host Authorities | APP-160 (oPRoWMP: 14.4.3; 14.4.6ii; 14.4.19); APP-045(9.4.14; 9.7.16-18; 9.8.60; T9.19) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | 85 to 89: potential long-term marginal positive impact; hold as neutral impact | |
| | 88 | Local impact(s), effects in terms of severance of access to facilities (e.g. healthcare services); APP-045 (T9.1 pg 9-13) 'No significant cumulative effects relating to transport and access have been identified': - discussion/ AECOM Report | Host Authorities | APP-045 (T9.1 pg 9-13); APP-050(14.4.3; 14.4.22; 14.8.23; 14.8.24; 14.8.50) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | 85 to 89: potential long-term marginal positive impact; hold as neutral impact | |
| Chp.15: Climate Change | 89 | Assessment, errors and/or inconsistencies in Application of the assessment methodology: - LIR, AECOM Report | Host Authorities | APP-050 | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | 85 to 89: potential long-term marginal positive impact; hold as neutral impact | |
| | 90 | Full life-cycle carbon footprint: a) Assumption - 50% to landfill with 100km radius, Finch ruling 2024, permanent negative impact: - address b) Scheme 40Y generates 666,000tCO2e, vs [APP-034, 5.6.3] saving 5.5m tonsCO2, displacement: - discussion | Host Authorities | Applicant Scoping (13.5.2); PINs Scoping (ID3.9.5; 3.9.8); APP-038(2.6.3; T2-35; 2.7.1); APP-116(2.3.1 50% to landfill; T15; T16) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Rule 6 Letter | |
| | 91 | Operational (replacement) phase activity understated/ requires assessment in ES: - discussion | Host Authorities | APP-051 (T15.4 pg.15-25) | na | | na | na | na | na | na | na | Matters 78, 85 to 89 | |
| Chp.16: Other Environmental Topics | 92 | GHG Assessment approach, raised several issues: - address | Host Authorities | APP-051; APP-116 | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Climate Change | |
| | 93 | Climate Change Risk Assessment: historic climate data review error | Host Authorities | APP-051 (15.4.7; T15.9) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Climate Change | |
| | 94 | Council's Carbon Reduction Delivery Strategy 2020-2030 Version 2 etal, reference Council's policy: - address | Bedford Borough Council | APP-051(T15.2); APP-116 | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Climate Change | |
| | 95 | Minerals and Waste, safeguarding of minerals extraction sites, policy position: - discussion | Minerals and Waste team at Central Bedfordshire Council | APP-031(7.16.5 - 9; AppexB; B3.6.7); APP-048(T12.1 pg.12-7) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Minerals and Waste | |
| DCO Document Review | 96 | Decommissioning phase a) Underground cables etc - see Matter 45 ; b) Revert to landowner - see Matter 31: - suggest consolidation | Host Authorities; NE; EA; LLFA | BBC PEIR (2024); Pins Scoping (ID2.1.110; 2.2.1); APP-031 (4.9.2; 4.9.3) | na | | na | na | na | na | na | na | Matter 31 and 45 | |
| | 97 | Oil pipeline, potential residual risk, discussion/approvals with Owner: - | Host Authorities | APP-016(DCO); APP-048(12.6.48; 12.6.50); APP-123 (Fig.2-3; 4.7.23); APP-155(oCEMP - 4.1.19 not addressed) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Clarification only | |
| | 98 | [APP-162] Outline Battery Safety Management Plan | Host Authorities | APP-009 (Dwg.010); APP-121 (Fig.2-1k) | na | | na | na | na | na | na | na | Matter 76 | |
| | 99 | Outline Battery Safety Management Plan: storage pond; water supply, in assessment with matter 98: - address | Host Authorities; Local Fire Authorities | APP-162 (OBSMP; 1.1.3; 1.1.4; 1.5.3; 1.2.2; etal) | na | | na | na | na | na | na | na | Matter 76 | |
| | 100 | Draft DCO: not supportive of DCO as drafted | Host Authorities | APP-016 | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Also refer to Aspect 1.1 to 1.6 | |

| | | | | | | | | | | | | | |
|---|-----|---|-------------------------|--|----|--------|-------------|------|-----------|--------------|------------|------------|---------------------------------|
| Chp.17: Cumulative and In-Combination Effects | 101 | Explanatory Memorandum: not supportive as drafted/ clarity | Host Authorities | APP-017 | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Also refer to Aspect 1.1 to 1.6 |
| | 102 | Extant planning consent: update to reflect Applications | Bedford Borough Council | APP-031(3.3.3; AppA; APP-053(7.3.2; T17.2) | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | Clarification only |
| Chp.18: Summary of Effects | | No comment | | | na | | | | | | | na | |
| Review raised | 103 | Landscape establishment: a) [APP-038] Work Package No.2 - \$2.4.40 control building (71sqm), water storage tanks (456,000l storage), BESS compound hard standing would drain; WP3 sub-station control building 1,030sqm; WP6a Maintenance building 800sqm; b) [APP-034] 5.8.6 rainwater 1,116,130l/annum collection: - partially contaminated water: vs b) [APP-116 T11] water requirement of 3m l/annum ; poor water supply in area: - address | Host Authorities | APP-039(W8 2.4.153-154); APP-116(T11); APP-159(oLEMP; 6.3.4-7). Has water bowser vehicle activity been used in the TA all phases? | | During | Significant | Host | Long-term | Irreversible | Continuous | Eliminated | tbc |
| | | END | | | | | | | | | | | |