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Date: 7th April 2026
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[REDACTED], Acting Executive Director
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Environment, Planning and Economy

Sent via the Planning Inspectorates on line form

Consents Team

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Dear Planning Inspectorate,

Application by BSSL Cambsbed 1 Limited for an order granting development consent for the East Park Energy project (EN010141)

Please find enclosed Cambridgeshire County Council's Summary of Relevant Representations for the above NSIP Project. This submission is being made for Deadline 1 of the Examination.

Cambridgeshire County Council's Relevant Representation [RR-150] was submitted to the Planning Inspectorate 14th January 2026. This is informed by officers from across a number of technical specialisms in the council.

If you have any queries regarding this submission or require any further information, please contact NSIPs@cambridgeshire.gov.uk.

Yours sincerely

[REDACTED]
Acting Executive Director, Place and Sustainability

East Park Energy

Summary of Cambridgeshire County Council Relevant Representations PINS Project Reference: EN010141

1 Introduction

- 1.2 This is a summary of Cambridgeshire County Council's (CCC) Relevant Representation. This was informed by the technical specialisms held within the authority. CCC defers to the other host authorities for matters outside its administration area and/or statutory responsibilities.
- 1.3 Cambridgeshire County Council will be submitting a Local Impact Report at deadline 1.

2 Landscape and Visual (ES Chapter 5)

- 2.1 See comments under Public Rights of Way (PROW) (see paragraph 6.15 of this document) that seek to address the impact to non-motorised users using the local PROW network.

3 Cultural Heritage and Archaeology (ES Chapter 6)

- 3.1 Some of the programme of archaeological evaluation took place too late to inform the Environmental Statement (ES), such as the grid connection corridors, and elements of intrusive evaluation that would ideally have taken place pre-consent, are now proposed as a requirement of the draft Development Consent Order. Archaeological intrusive evaluation via trial trenching is likely the appropriate mitigation measure for the cable routes as opposed to Archaeological monitoring as proposed.
- 3.2 Site C
- The trial trenching report for Site C is excellent and provides considerable detail.
 - The council requests details of where the projected extent of any burials might be in site C, and if uncertain, requests that the applicant addresses how certainty would be improved.
- 3.3 Site D
- The assessment of effects in the ES is relatively poorly informed. The council requests that, as a minimum, the pottery report is made available to view before the end of the Examination stage.
- 3.4 The temporary access road proposed to cross the scheduled monument in Site C is a concern. The council asks of the applicant to:
- Provide further details to demonstrate archaeological remains will be preserved
 - Engineering rationale for the proposed method and examples of being successfully used in other developments.

3.5 Areas of Archaeological Constraint (AACs)

- The council finds the size/scale of the 12 Areas of Archaeological Constraint (AACs) within Sites C and D broadly appropriate. However, the use of prefabricated concrete blocks set on the topsoil is not suitable on some areas of particularly complex archaeological remains, due to potential for compression damage.

3.6 The council supports the undertaking that the Outline Archaeological Mitigation Strategy covers the lifetime of the scheme, including decommissioning, and that its implementation will be overseen by an Archaeological Clerk of Works.

3.7 The council supports the Historic Environment enhancement measures proposed in Chapter 6 of the ES and the Outline Heritage Enhancement Strategy.

4 Ecology and Nature Conservation (ES Chapter 7)

4.1 The Council welcomes proposal to retain all woodland and the majority of hedgerows in Cambridgeshire (only 24m hedgerow will be lost) and add additional woodland, hedgerow, species-rich grassland as well as enhance watercourses. Confirmation that other notable habitats will be retained and incorporated into the landscape design is needed.

4.2 The council is concerned of the following.

- Assessments are based on incomplete ecological survey work (including habitat / flora, bat, water vole, great crested newt, wintering birds) and it is not always possible to determine ecological baseline.
- The impact of some aspects of the scheme are difficult to understand due to lack of clarity and contradictions on the drawings / documents or missing information.
- Some potential impact pathways for ecological receptors have not been identified or sufficiently considered.

4.3 Further assurance is needed for the delivery of biodiversity mitigation / compensation by...

- incorporating into other documents. (e.g. environmental masterplan, engineering drawing and management plans)
- providing evidence to demonstrate that protected species licence(s) can be obtained (e.g. letter of no impediment and/or district level licencing for great crested newt).

4.3.1 Further details are required to demonstrate there will be no net loss of ground nesting birds, including skylarks (population of county importance) and lapwing by the removal of nesting habitat.

BNG

4.4 The scheme suggests net gains in biodiversity value (biodiversity net gain - BNG) will be delivered. This is not an accurate assessment given the incomplete baseline surveys.

4.5 The delivery and monitoring of the proposed BNG (stating the target) will need to be secured in the Development Consent Order schedule of requirements.

4.6 The scheme will only deliver “no net loss” for watercourse BNG units, rather than significant net gains (minimum 10% BNG).

Operational

- 4.7 The Outline Landscape and Ecological Management Plan [APP-159] does not adequately cover all post-development habitats (e.g. watercourse enhancement to River Kym tributary) and some opportunities to maximise biodiversity value have been missed.
- 4.8 More evidence is required quality of habitats can be created within the time period of the proposed scheme, and there are no conflicts with bespoke management requirements for biodiversity compensation (ground nesting birds) and/or archaeology (e.g. scheduled monument).
- 4.9 The council seeks further discussions about the proposed planting to ensure it is appropriate to Cambridgeshire.
- 4.10 The council welcomes the establishment of a Steering Group to oversee the implementation of the Landscape and Ecological Management Plan during the operational phase. Funding for this is required.

Decommissioning

- 4.11 The council welcomes confirmation that habitats will be retained during the decommissioning phase. However, we are disappointed that a strategy is not going to be put in place to help support the landowners and identify opportunities to secure long-term management of all biodiversity-rich habitats beyond the decommissioning phase.
- 4.12 The council suggests a Biodiversity Net Gain assessment is completed for the decommissioning phase.

5 Hydrology and Flood Risk (ES Chapter 8)

- 5.1 Whilst the approach taken by the applicant is supported in principle, insufficient information has been provided at this stage to demonstrate that the proposals will not increase flood risk elsewhere.
- 5.2 Until the following matters are addressed, the LLFA is unable to confirm that the proposals are acceptable with respect to surface water drainage and flood risk. Outstanding information to be shared is listed below.
- Hydraulic calculations including the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storms. Flood Estimation Handbook (FEH) 2022 rainfall data required and suitable climate change for the 3.3% and 1% AEP.
 - Drainage layout plans for each catchment.
 - Demonstration of pollution risk areas and how water is managed during all stages for each catchment.
 - Flow rates for each individual catchment
- 5.3 The council requests the re-wording of the Protective Provisions (APP-016 - Draft DCO EN010141.DR/3.1), to ensure the LLFA approves proposed works, and that works are limit to that within the watercourse.

6 Traffic and Transport (ES Chapter 9)

DCO Order [APP-009]

- 6.1 The council, in its role as Local Highway Authority (LHA), seeks that all works within the adopted public highway are agreed with the applicant. The council considers Protective Provisions for the LHA is needed to provide a suitable level of assurance the LHA will have oversight and approval or works on its highway.
- 6.2 Street Works (Article 10 and Schedule 4 of the DCO [App-016])- The schedule should clearly state which streets are public highways and to which highway authority.
- 6.3 The applicant should be required to agree with the LHA the following.
- The timing and nature of works (including any permits required). This is to enable the LHA to co-ordinate the network.
 - Temporary Traffic Regulation Orders (TTROs).
- 6.4 Further information is required for the following.
- Fully dimensioned plans of each access are needed and to include all relevant dimensions, widths and radii, along with tracking showing two-way (simultaneous) movements of the largest vehicles which will use them.
 - further details of the permanent alteration to streets as indicated in [APP-010]
- 6.5 The council notes in the Transport Assessment [APP-101] (Fig C5) the extent of carriageway widening required to facilitate two-way HGV movement extends beyond the order limit.
- 6.6 Site access assessments, the council prefers the use of Design Manual for Roads and Bridges (DMRB).
- 6.7 Temporary weight restriction suspension is not supported by the council, and it is not needed. The weight restriction allows for HGVs delivering to a property or development.
- 6.8 If confirmed that the internal route to SA-11 is possible, then the Zantra access (SA-12) and egress should be removed.

Transport Assessment [APP-101] Environmental Statement - Vol 2 Appendix 9-1

- 6.9 There are no significant concerns in respect of the volume of traffic during the construction period as the staff movements will be during the AM and PM peak shoulders and not the peak hours.
- 6.10 The council will require a routing plan for HGVs which must deal with:
- Routes to and from the site for all vehicle particularly HGVs
 - How the routing plan will be enforced i.e. monitoring, geofencing etc.
 - How breaches will be dealt with.
 - A plan of public engagement and communication throughout the construction process.

- 6.11 The Council requests that the routing plan should direct HGVs so to access the B645 from the northbound exit to avoid a residential area.
- 6.12 The council would like to see more detail as to the measures to reach staff occupancy of 2 persons per car and further measures to implement if not met.

Outline Public Rights of Way Management Plan (OPROWMP) [APP-160]

- 6.15 The council requests that the applicant proposes new permissive paths to connect communities and connect existing PROW networks including enabling a wider network of routes for cyclists and equestrians. The council's ambitions of this are:
- Improved east-west connectivity to enable access from rural communities to St Neots and the National Cycle Network at or near to Hail Weston.
 - North-South connectivity to Grafham Water.
 - Improvements to pre-existing PROW infrastructure
 - a new circular permissive bridleway around the edge of the proposed grassland area on the Northeastern side of site D.
- 6.16 Within Cambridgeshire and the proposed development there is one Definitive Map Modification Order (DMMO) application. Without prejudice, the council requests that a 7-metre-wide corridor is kept available along the line of the DMMO application.
- 6.17 The council requests that the applicant seeks alternatives to using PROW (112/7 and 112/8) for permanent vehicular access. Should that be unavoidable, there needs to be safe provision for Non-Motorised Users (NMU).
- 6.18 Draft DCO [APP-016] Schedule 9 section 1(b) the council requests that the DCO does not provide the applicant with powers to alter, remove, replace, existing public rights of way other than those specifically defined in the schedules and rights of way and access plans.
- 6.19 Where construction access or cable routes utilise or cross PROW, a conditional survey is requested for approval by the LHA ahead of laying. The PROW should be restored to an acceptable condition after completion.
- 6.20 Temporary diversions of PROW are to be approved by the LHA. They should only be deployed for the periods for which they are absolutely necessary and not add unreasonably to the length of user journeys. The diversion should be of an equal or better standard of width and surface, compared to the route that they are replacing.

7 Noise and Vibration (ES Chapter 10)

- 7.1 Huntingdonshire District Council will be commenting on Noise and Vibration in detail. As it relates to public rights of way equestrian users it is requested that any inverter buildings near public rights of way be constructed to minimise transfer of sound so that horses are not unsettled by any noise that this equipment may cause.

8 Land and Soils (ES Chapter 13)

- 8.1 The applicant needs to evidence the economic impact associated with the agricultural industry and the scheme's impact on agricultural production in the area. The loss of land capable of food production is less well documented by the applicant and should be assessed.

9 Socio Economics, Land Use and Tourism (ES Chapter 14)

Skills and Employment

- 9.1 The council would like to see clear apprenticeship and skills acquisition opportunities for local people included in the Outline Skills Supply Chain and Employment Plan [APP-163].
- 9.2 The council request that Cambridgeshire County Council's Communities Service be engaged in the development of the proposed legacy fund

Community Safety

- 9.3 The applicant is advised to liaise with the Community Safety Partnerships relevant to the project area including Huntingdonshire Community Safety Partnership and Bedford Borough Community Safety Partnership to mitigate unintended consequences of the project on local communities.

10 Climate Change (ES Chapter 15)

- 10.1 The council welcomes the embedded mitigation and enhancement measures identified that are incorporated into the project, with additional measures to be developed during the detailed design phase. However, assurance that these measures do get implemented will be required.
- 10.2 The council welcomes the alternate comparator using current grid mix alongside displaced baseload gas fired Combined-Cycle Gas Turbine (CCGT). To aid transparency whilst acknowledging the limitations and challenges of each of the methodologies used, the council strongly suggests the range is used.
- 10.3 It is unclear from the statement what the intended approach will be should peat be identified. This should be incorporated into any Carbon Management Plan when developed, ideally including re-calculation of the scheme's carbon benefit.
- 10.4 Climate Resilience (Paragraph 15.9.1). This should be kept under review through the lifespan of the project, should climate risks emerge or become more acute than is currently modelled.

11 Other Environmental Topics (ES Chapter 16)

- 11.1 The council welcomes Table 16.3 [APP-052] which reviews the Wider Determinants of Health of the scheme (as per the Institute of Environmental Management and Assessment (IEMA) Scoping Guidance). The council would like to see other pathways identified. These are:
- Open space leisure and play
 - Community Safety
 - Community identity, culture, resilience and influence

12 Other Comments

- 13.1 The Development Consent Order, Schedule 2, Requirements, [APP-016] there is repeated reference made to 'the local planning authority'. For the purposes of clarity, each requirement that currently states, 'the local planning authority', should make clear the authority or authorities to receive and approve submissions.

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