



EAST PARK ENERGY

East Park Energy

EN010141

Statement of Common Ground (Draft)

Historic England

Document Reference: EN010141/DR/8.19

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

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Planning Act 2008

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

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**between the Applicant
and
Historic England**

APFP Regulation Reference:	Regulation 5(2)(q)
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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

Historic England

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 Order Limits have 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 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 Historic England 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 Historic England; 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 Historic England is provided at Appendix A.

2.0 ROLE OF HISTORIC ENGLAND IN DCO PROCESS AND SUMMARY OF CONSULTATION

2.1 Role of Historic England

2.1.1 Historic England's is a statutory consultee as prescribed under Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

2.1.2 Historic England is responsible for the historic environment and acts as the Government's expert adviser on heritage including archaeology, listed buildings, scheduled monuments, conservation areas, registered parks and gardens, battlefields and other heritage assets.

2.2 Summary of Consultation Undertaken

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

Table 1: Consultation between the Applicant and Historic England

Date	Method of Consultation	Points of Discussion
15/11/2023	MS Teams	<ul style="list-style-type: none"> Project introduction Scope of archaeological surveys Approach to Enhanced Advisory Service
11/01/2024	In-Person Meeting – Cambourne	<ul style="list-style-type: none"> Applicant shared the confidential findings of the geophysical survey in Site C with Historic England and Cambridgeshire County Council
12/03/2024	MS Teams	<ul style="list-style-type: none"> Workshop with Historic England, Bedford Borough Council and Cambridgeshire County Council to discuss approach to assessment of impacts on designated and non-designated heritage assets
13/03/2024	MS Teams	<ul style="list-style-type: none"> Workshop with Historic England, Bedford Borough Council and Cambridgeshire County Council to discuss approach to assessment of archaeological impacts

Date	Method of Consultation	Points of Discussion
28/03/2024	MS Teams	<ul style="list-style-type: none"> Meeting to discuss approach to intrusive archaeological investigations within Site C
08/04/2024	Email	<ul style="list-style-type: none"> Historic England provided comments on scope of WSI for Targeted Trial Trenching in Site C
15/04/2024	MS Teams	<ul style="list-style-type: none"> Meeting to understand the process of designating a new Scheduled Monument
15/04/2024	Email	<ul style="list-style-type: none"> Historic England provided agreement on scope of WSI for Targeted Trial Trenching in Site C
23/05/2024	Email	<ul style="list-style-type: none"> Historic England comments on approach to intrusive archaeological investigations across the Site
15/08/2024	Email	<ul style="list-style-type: none"> Approach to timing and press release in relation to the scheduling of the Roman small town in Site C
02/09/2024	MS Teams	<ul style="list-style-type: none"> Meeting to discuss timing of announcement of the scheduling of the Roman small town scheduled monument
20/09/2024	Email	<ul style="list-style-type: none"> Historic England comments on WSI for geophysical survey
18/10/2024	MS Teams	<ul style="list-style-type: none"> Progress meeting
28/02/2025	Email	<ul style="list-style-type: none"> Discussion on Historic England attendance at community knowledge-share event arranged by the Applicant
28/03/2025	MS Teams	<ul style="list-style-type: none"> Progress meeting
07/08/2025	Email	<ul style="list-style-type: none"> Applicant shared draft Outline Archaeological Mitigation Strategy for comment
22/08/2025	MS Teams	<ul style="list-style-type: none"> Meeting to discuss findings of the site-wide archaeological trial trenching

Date	Method of Consultation	Points of Discussion
05/09/2025	MS Teams	<ul style="list-style-type: none"> Meeting to discuss Historic England's preferred approach to incorporating Scheduled Monument Consent within the DCO, and ensuring Historic England's oversight of the works at construction.
17/09/2025	Email	<ul style="list-style-type: none"> Comments received from Historic England on the draft outline Archaeological Mitigation Strategy
08/12/2025	MS Teams	<ul style="list-style-type: none"> Progress meeting to discuss the submitted application and the Relevant Representation period
10/12/2025	Email	<ul style="list-style-type: none"> Applicant shared details relating to the approach to incorporating Scheduled Monument Consent within the DCO
13/03/2026	MS Teams	<ul style="list-style-type: none"> Progress meeting Discussion of approach to Statement of Common Ground
13/03/2026	Email	<ul style="list-style-type: none"> Applicant shared draft responses to Historic England on their Relevant Representation
20/03/2026	Email	<ul style="list-style-type: none"> Applicant shared first draft Statement of Common Ground

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]**:

- The effects on heritage assets and their settings and consideration of cumulative effects;
- Archaeological considerations;
- Various Environment Management Plans, both during construction and operation; and
- The dDCO.

3.1.2 The matters that have been agreed, are under discussion, or are not agreed between the Applicant and Historic England are set out in Table 2.

Table 2: Position between the Applicant and Historic England on matters of discussion / consultation

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
Topic: Draft Development Consent Order				
01	The requirements set out at Schedule 2 of the draft DCO.	Historic England welcomes inclusion of the Requirement 15 and 16 within the wording of the draft DCO. We will provide further comments on the wording of both requirements in our Written Representations.	The Applicant notes this comment.	Under Discussion
Topic: Other Consents and Licences				
02	The granting of Scheduled Monument Consent through the draft DCO.	Subject to Historic England being consulted on the final Archaeological Mitigation Strategy prior to any works on Site (in accordance with Requirement 15 of the draft DCO [PDA-005]), Historic England is content that the draft DCO would grant Scheduled Monument Consent for the specified works at the Roman Small Town south of Great Staughton Scheduled Monument (National Heritage List for England ref. 1491190) in accordance with Section 33 of the Planning Act 2008.	The Applicant notes this comment. Historic England will be consulted by the relevant Local Planning Authority on the final Archaeological Mitigation Strategy prior to commencement of any works on Site. The final Archaeological Mitigation Strategy must be in substantial accordance with the outline Archaeological Mitigation Strategy [EN010141/DR/7.15] .	Matter Agreed

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
Topic: Control Documents				
03	The Applicant's outline Archaeological Mitigation Strategy.	<p>Historic England is broadly content with the approach to mitigation as set out in the Applicant's draft outline Archaeological Mitigation Strategy [APP-166].</p> <p>Historic England will provide comments in our Written Representations on points which would benefit from additional clarification or require minor amendments.</p> <p>Historic England support the inclusion of a requirement in the outline Archaeological Mitigation Strategy [APP-166] for further archaeological investigation post-consent and prior to construction, to inform the final Archaeological Mitigation Strategy.</p>	The Applicant notes this comment and looks forward to working with Historic England on the further archaeological investigation works, and the preparation of the final Archaeological Mitigation Strategy, should the Scheme be consented.	Under discussion
04	The Applicant's outline Heritage Enhancement Strategy.	Historic England is content that the Applicant's outline Heritage Enhancement Strategy [APP-167] is appropriate for the purposes of the examination.	The Applicant notes this comment and looks forward to working with Historic England on the delivery of the final Heritage Enhancement Strategy should the Scheme be consented.	Matter Agreed

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
Topic: Project Benefits				
05	The project benefits claimed by the Applicant in respect of the historic environment.	<p>Historic England recognise that there would be specific benefits arising from the Scheme that would provide public benefits with regard to the historic environment, notably through actions already taken by the Applicant during the pre-application phase, and post-consent through the secured outline Heritage Enhancement Strategy [APP-167].</p> <p>Historic England agrees with the public benefits set out in the Cultural Heritage and Archaeology sub-section in Section 5.4 of the Planning Statement [APP-031].</p> <p>The benefits for the historic environment will need to be secured for the life time of the scheme, and through decommissioning. Further discussion is currently needed on the mechanism for securing those benefits, and Historic England has provided initial advice on this to the Applicant.</p>	The Applicant welcomes agreement with Historic England that the Scheme will deliver public benefits, and will continue to engage with HE on their request for securing the benefits over the lifetime of the Scheme. The Applicant looks forward to working with Historic England on the delivery of future heritage benefits, should the Scheme be consented.	Under Discussion

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
Topic: Cultural Heritage				
06	The study areas and methodology used for the assessment of designated heritage assets.	Historic England confirm the study area and methodology used for the assessment is adequate for the purposes of the examination. Historic England consider that heritage sensitivity is acknowledged in the ES, which also confirms the proposal will impact upon a wide range of heritage receptors both designated and undesignated.	The Applicant welcomes agreement with Historic England on this matter.	Matter Agreed
07	The baseline data for the assessment of designated heritage assets.	Historic England confirm the baseline and assessment are appropriate for the purposes of the examination as set out in ES Vol 2 Appendix 6-2 Desk Based Assessment [APP-081] and ES Vol 1 Chapter 6 Cultural Heritage and Archaeology [APP-042] .	The Applicant welcomes agreement with Historic England on this matter.	Matter Agreed
08	The measures proposed to mitigate impacts to designated heritage assets.	Historic England consider that relevant heritage receptors have been considered in the design of the scheme, and a robust approach to mitigation has been proposed.	The Applicant welcomes agreement with Historic England on this matter.	Matter Agreed
09	The conclusions in respect of the assessment of impacts and	Historic England broadly agree with the Applicant's conclusions with	The Applicant notes this comment and has provided an initial response at	Under Discussion

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
	<p>effects to designated heritage assets.</p>	<p>regard the assessment of impacts and effects to designated heritage assets, but is still under discussion with the Applicant in relation to the impact on the setting of the following assets:</p> <ul style="list-style-type: none"> • Church of St Mary the Virgin Keysoe (listed grade I); • Church of All Saints, Little Staughton (listed grade I); and • Great Staughton Conservation Area; • Roman small town to the south of Great Staughton (scheduled monument); • Roman site, Rushey Farm (scheduled monument); • Two bowl barrows 900m and 1000m east of Old Manor Farm (scheduled monument); and • The Old Manor House, Cretingsbury: a motte castle and moated manor house (scheduled monument). <p>Historic England will provide further comment in relation to these assets in a Written Representation at Deadline 1.</p>	<p>Deadline 1 with reference to response HE-RR-10 in the Applicant's Response to Relevant Representations.</p> <p>The Applicant will provide an update once in receipt of Historic England's comments at Deadline 1.</p>	

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
Topic: Archaeology				
10	The conclusions of the Applicant's archaeological geophysical surveys.	<p>Historic England acknowledge the conclusion of ES Vol 2 Appendix 6-5 Archaeological Geophysical Survey Report [APP-084 to APP-086].</p> <p>Historic England support the requirement for further archaeological investigations prior to construction, as secured by Requirement 15 of the draft DCO [PDA-005].</p>	The Applicant welcomes agreement with Historic England on this matter.	Matter Agreed
11	The conclusions of the Applicant's archaeological trial trenching.	<p>Historic England note the findings of the Archaeological Trial Trench Evaluation Reports submitted for Sites A to D, but will reserve final comments until such time that the final reports are submitted for Sites B and D (which are still outstanding at Deadline 1).</p> <p>Historic England will provide an update on this matter once the final reports are available.</p> <p>Historic England support the requirement for further archaeological investigations prior to construction, as secured by Requirement 15 of the draft DCO [PDA-005].</p>	<p>The Applicant notes this comment. The final trial trench evaluation reports for Sites B and D are expected to be ready for submission at Deadline 2.</p> <p>The Applicant will remain in discussion with Historic England on this matter.</p>	Under Discussion

Ref.	Summary of Matter	Historic England Position	Applicant Position	Status
		<p>HE note that there has not been any trenching on the export cable route. We acknowledge this will be completed post DCO, however this remains a risk for the Applicant. The applicant will therefore need to ensure there is a secure mechanism and process for dealing with and managing unexpected and high value archaeological discoveries through the draft AMS & WSI documents and secured by the DCO requirement.</p>		
Topic: Cumulative Effects				
13	<p>The conclusions of the Applicant's assessment of cumulative effects on the historic environment.</p>	<p>Historic England confirms the conclusions of the Applicant's assessment of cumulative effects are appropriate for the purposes of the examination, as set out at Table 17.5 of ES Vol 1 Chapter 17 [APP-053].</p>	<p>The Applicant welcomes agreement with Historic England on this matter.</p>	Matter Agreed

APPENDIX A

BSSL Cambsbed 1 Ltd

Name:

Signature:

Position:

On behalf of:

BSSL Cambsbed 1 Ltd

Date:

Historic England

Name:

Signature:

Position:

On behalf of:

Historic England

Date:
