



# EAST PARK ENERGY

## East Park Energy

EN010141

## Statement of Common Ground (Draft)

### Bedford Borough Council

(Reviewed by Bedford Borough Council ('BBC') for Deadline 2: status DRAFT/ 24 April 2026.

To be submitted by the Applicant to the ExA.

(BBC reserves its right to comment further regarding this document post Deadline 2 as part of the Examination procedure. This dSoCG response is solely that of Bedford Borough Council, submitted without prejudice, and signed-off under delegated authority (Bedford Borough Council, Planning Committee Scheme of Delegation, adopted 2nd February 2022).

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

**April 2026**

Version P01

# EAST PARK ENERGY

Planning Act 2008

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

## Statement of Common Ground (Draft)

**between the Applicant  
and  
Bedford Borough Council**

<b>APFP Regulation Reference:</b>	Regulation 5(2)(q)
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## 1.0 INTRODUCTION

### 1.1 Purpose of this Document

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

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

***and***

***Bedford Borough Council (BBC)***

- 1.1.1 The purpose and scope of this dSoCG 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, lasting for a period of up to approximately 2 years.

## 1.3 The Site

- 1.3.1 The Scheme 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). 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.
- 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.

## 1.4 Status of the dSoCG

- 1.4.1 This dSoCG is a 'live' document that will be updated and amended as the Examination progresses. It identifies those aspects, matters and issues relating to the Scheme that have been agreed between the parties, those under discussion, together with those not agreed. The following definitions are provided for Matters Agreed, Under Discussion, or Not Agreed:

- **Matter Agreed** – means that agreement on the point recorded in the dSoCG has been reached, having regard to the information available at the date of that version of the document. No further discussion on that matter is considered necessary unless new information, amendments to the Application, or other material changes arise. Agreement on a particular

matter does not, of itself, indicate that the Council supports the Application overall.

- **Under Discussion** – means the Applicant and the Council have not yet reached agreement on the point recorded in the SoCG, but discussions remain ongoing with a view to resolving the matter, clarifying the parties' respective positions, or narrowing the extent of any disagreement. Further information, drafting, evidence or engagement may be required before the matter can move to 'Matter Agreed' or 'Not Agreed'.
- **Not Agreed** – means the Applicant and the Council have reached a clear and settled difference in position such that the matter is not capable of agreement. In these circumstances, further discussion is not expected to resolve the issue.

1.4.2 It is intended that the final SoCG will be finalised and signed by the Applicant and Bedford Borough Council as requested by the Examining Authority during the Examination.

## 1.5 Structure of the SoCG

1.5.1 This dSoCG is structured as follows:

- Section 2.0 – provides a summary of consultation undertaken with BBC; 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 BBC is provided at Appendix A to be signed on final Agreement.

## **2.0 ROLE OF BEDFORD BOROUGH COUNCIL IN DCO PROCESS AND SUMMARY OF CONSULTATION**

### **2.1 Role of Bedford Borough Council**

- 2.1.1 BBC is one of three local planning authorities for the area within which the Scheme is located and is a prescribed consultee under Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).
- 2.1.2 BBC is responsible for the preparation and implementation of the development plan for its area and for providing local planning, environmental and technical input to the Examination of the application, including through the submission of a Local Impact Report under section 60 of the Planning Act 2008.
- 2.1.3 Subject to the grant of development consent, BBC will be one of the local planning authorities responsible for the approval of applications made pursuant to the requirements set out in Schedule 2 of the DCO, and for monitoring and taking appropriate enforcement action in respect of compliance with those requirements within its administrative area.

### **2.2 Summary of Consultation Undertaken**

- 2.2.1 The Applicant has consulted with BBC from the earliest stages of the application process, with an initial inception meeting held in June 2023. Since this time, the Applicant has held regular joint progress meetings generally at monthly intervals with Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council (collectively, the 'Host Authorities'). Following submission of the application in October 2025, the frequency of these joint progress meetings has increased to a fortnightly basis.
- 2.2.2 From the outset of the project the Host Authorities requested a joint Planning Performance Agreement (PPA) with the Applicant. To achieve this, the Host

Authorities agreed a separate Memorandum of Understanding between the three Host Authorities setting out areas of delegated authority in order to speak as a 'single voice' on the project. The Applicant is not privy to this Memorandum of Understanding but has supported the approach. The Applicant has agreed a single PPA with the Host Authorities that was signed in July 2025, before being extended to cover the post-submission phase through to the Secretary of State issuing a decision. The PPA includes an intent for the PPA to be extended to cover the post-decision phase, should the Scheme be granted development consent.

2.2.3 It is noted that each authority retains their independence in reviewing the Application.

2.2.4 The Applicant has not sought to set out every correspondence or meeting record with the Host Authorities within this dSoCG. Key areas of discussion from the pre-application and pre-examination of the project have included:

- Approach to consultation;
- Approach to Environmental Impact Assessment;
- Approach to Scheme design;
- Approach to environmental surveys and assessment; and
- Approach to assessment of cumulative effects.

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## 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 matters as requested in Annex F of the Examining Authority's **Rule 6 Letter [PD-005]**; namely:

- a) Principle of Development.
- b) Economic and social effects, including any implications for the Local Plan strategy and of transport effects on local communities.
- c) Construction traffic.
- d) Environmental Impact Assessment, including cumulative effects.
- e) Landscape and visual effects, including lighting.
- f) Any other potential effects, including on heritage assets, biodiversity, noise and vibration, air quality, emissions, contamination and emergency planning.
- g) Good design.
- h) Various environment management plans, both during construction and operation.
- i) The draft DCO Agreement, including requirements and discharge mechanisms.

3.1.2 The aspects, matters and issues that have been agreed, are under discussion, or are not agreed between the Applicant and Bedford Borough Council, as defined in Para1.4.1, are set out in Table 2.

**Table 2: Position between the Applicant and Bedford Borough Council on matters of discussion / consultation**

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
<b>Topic: Draft Development Consent Order</b>				
01	The Articles of the draft DCO set out in Parts 1 to 7.	<p>BBC are continuing to review the Articles of the draft DCO and will provide further comments at Deadline 3.</p> <p>* As a point of principle to Bedford Borough Council's dSoCG response and position, the Council has identified very specific aspects, matters and issues relating to the Application in their Relevant Representations (RR), Local Impact Report (LIR), and Written Representations (WR) which are NOT reflected/ identified as such within the Applicant's dSoCG 'Summary of Matters'. Consequently, until the Council is able to marry up these two points of review and attain agreement of such with the Applicant, the Council make a blanket statement across this dSoCG that all matters in Table 2 as set out have the status 'Under discussion'. An updated dSoCG will be submitted as part of Deadline 3.</p>	<p>The Applicant notes this comment and will continue to engage with BBC on the matters of the Articles of the draft DCO.</p> <p>**The Applicant's approach to structuring this SoCG is presented in order to be consistent across different topics and matters in the different SoCGs, such that it is of most benefit to the ExA in identifying commonality across the different SoCGs. This also ensures the Statement of Commonality can be clearly presented. The Applicant considers that the topics and matters covered in this table adequately cover all relevant aspects of the application.</p>	Under Discussion*
02	The description of the Authorised Development at Schedule 1 of the draft DCO.	BBC are continuing to review and will provide further comments at Deadline 3	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
03	The Requirements at Part 1 of Schedule 2 of the draft DCO, and the discharge procedure set out in Part 2 of Schedule 2 of the draft DCO.	BBC are continuing to review and will provide further comments at Deadline 3.	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion
04	The highways and rights of way works set out in Schedules 4 to 8 of the draft DCO.	BBC are continuing to review and will provide further comments at Deadline 3.	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion
05	The hedgerow works set out in Schedule 12 of the draft DCO.	BBC are continuing to review and will provide further comments at Deadline 3.	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion
06	The Protective Provisions set out in Schedule 13 of the draft DCO	BBC are continuing to review and will provide further comments at Deadline 3. It is noted that the Host Authorities are engaging with the Applicant over whether there is a need for Protective Provisions when acting in their capacity as Local Highway Authority.	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion
07	The list of documents to be certified, set out in Schedule 15 of the draft DCO.	BBC are continuing to review and will provide further comments at Deadline 3.	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
<b>Topic: Other Consents and Licences</b>				
08	The Applicant's scope of other consents and licences required for the Scheme, and the approach to obtaining these.	BBC are continuing to engage. This includes: <ul style="list-style-type: none"> <li>• Ordinary Watercourse Consent; and,</li> <li>• Highways related agreements.</li> </ul>	The Applicant notes this comment and will continue to engage with BBC on this matter.	Under Discussion
<b>Topic: Control Documents</b>				
09	The scope of the Design Parameters and Principles Document.	BBC are continuing to review and will provide further comments at Deadline 3.	The Applicant notes this comment and will continue to engage with BBC on this matter.  The Applicant is not aware of any specific disagreements that BBC has with the design parameters or principles set out in the <b>Design Parameters and Principles Document [REP1-030]</b> .	Under Discussion
10	The scope of the outline Construction Environmental Management Plan	BBC in-principle agrees with the oCEMP, subject to address regarding: <ul style="list-style-type: none"> <li>• mitigation measures for the former oil pipeline are included;</li> <li>• reasonable avoidance measures for protected species are provided;</li> </ul>	The Applicant acknowledges the matters raised in BBC's relevant representation and has updated the <b>oCEMP [REP1-032]</b> at Deadline 1. The Applicant trusts these updates will ensure the oCEMP is satisfactory to BBC.  The Applicant will remain in discussion with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		<ul style="list-style-type: none"> <li>measures are included for the management of peat should it be discovered;</li> <li>Matters as identified in the in RR, LIR and WR as submitted.</li> </ul>		
11	The scope of the outline Construction Traffic Management Plan	BBC has concerns around the Applicant's oCTMP and has set out a number of clarifications in its relevant representation. In addition, these matters were raised by BBC at Issue Specific Hearing 2 (ISH2).	The Applicant acknowledges the matters raised by BBC and has updated the <b>oCTMP [REP1-034]</b> at Deadline 1. The Applicant is consulting with BBC and CCC in relation to the oCTMP and is confident that the issues raised can be resolved to the satisfaction of all parties.	Under Discussion
12	The scope of the outline Operational Environmental Management Plan	BBC has noted that the Replacement Phase is subsumed within this MP and have raised the concern that this should be presented as a stand-alone Plan for assessment, determination, and to allow for effective enforcement.	<p>The Applicant acknowledges the matters raised in BBC's relevant representation and is continuing to discuss the matter of replacements.</p> <p>The Applicant recognises there is some uncertainty amongst stakeholders about how any replacements during the operational phase will be undertaken, and is preparing a standalone Technical Note providing a consolidated summary of these works, the assessed environmental effects in the ES, and the embedded mitigation measures. The Applicant expects to have this Technical Note ready to submit to the examination for Deadline 3.</p> <p>The Applicant will remain in discussion with BBC on this matter.</p>	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
13	The scope of the outline Decommissioning Environmental Management Plan	BBC is seeking confirmation from the Applicant that the oDEMP addresses the removal of all infrastructure elements that may contain contaminative materials such as cabling and conduit at the decommissioning Phase.	<p>The Applicant has updated the <b>oDEMP [REP1-038]</b> at Deadline 1 to take into account of contemporary best practice and regulatory guidance at the point of decommissioning, whilst assessing the environmental implications of removing versus retaining sub-surface infrastructure. The Applicant has also updated the <b>oDEMP [REP1-038]</b> at Deadline 1 to clarify that the cable jointing chambers associated with the grid connection will be removed from the ground during the decommissioning phase. The Applicant trusts these updates will ensure the oDEMP is satisfactory to BBC.</p> <p>The Applicant will remain in discussion with BBC on this matter.</p>	Under Discussion
14	The scope of the outline Landscape and Ecological Management Plan	<p>BBC has concerns regarding aspects of the oLEMP, including:</p> <ul style="list-style-type: none"> <li>• adequacy of ecological mitigation measures set out in the oLEMP;</li> <li>• matters relevant to securing adequate biodiversity net gain;</li> <li>• matters relevant to successfully establishing species-diverse grasslands;</li> <li>• details of permissive access provided as part of the Scheme; and,</li> </ul>	<p>The Applicant acknowledges the matters raised in BBC's relevant representation and updated the <b>oLEMP [REP1-040]</b> at Deadline 1. The Applicant trusts these updates will ensure the oLEMP is satisfactory to BBC, but will remain in discussion with BBC on this matter.</p>	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		<ul style="list-style-type: none"> <li>Matters as identified in the in RR, LIR and WR as submitted.</li> </ul>		
15	The scope of the outline Public Rights of Way Management Plan	BBC has concerns regarding the use, mitigation of harm, enhancement, technical specification, delivery, maintenance, management and enforcement of the public rights of way during the life-time of the Scheme.	The Applicant acknowledges the matters raised by BBC and updated <b>oPROWMP [REP1-042]</b> at Deadline 1. The Applicant is consulting with BBC and CCC in relation to the oPROWMP and is confident that the issues raised can be resolved to the satisfaction of all parties.	Under Discussion
16	The scope of the outline Soil Management Plan	BBC raised concerns in its relevant representation about the adequacy of the soil surveys undertaken to date being suitable for the construction phase of the Scheme.	<p>The Applicant has updated the <b>oSMP [REP1-044]</b> at Deadline 1 to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase. The Applicant trusts this update will ensure the oSMP is satisfactory to BBC.</p> <p>The Applicant will remain in discussion with BBC on this matter.</p>	Under Discussion
17	The scope of the outline Battery Safety Management Plan	BBC raised points of clarity in relation to the oBSMP and directly related infrastructure within its RR.	<p>The Applicant acknowledges the matters raised in BBC's relevant representations and has provided responses in the <b>Applicant's Responses to Relevant Representations [REP1-055]</b>. The Applicant trusts these responses provide the clarity that BBC are seeking.</p> <p>The Applicant will continue to consult with BBC on this matter.</p>	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
18	The scope of the outline Skills, Supply Chain and Employment Plan	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	<p>The Applicant has set out that the oSSCEP establishes an overarching framework and commitments for maximising local employment, skills development and supply chain opportunities.</p> <p>Requirement 19 of the <b>draft DCO [AS-008]</b> secures the submission of a final Skills Supply Chain and Employment Plan (SSCEP), following consultation with the relevant local planning authorities, prior to commencement of construction. The final SSCEP will include further analysis of local skills gaps and provision, identification of tailored initiatives, measurable outputs, and a clear programme for stakeholder engagement, thereby providing the route map sought by Bedford Borough Council.</p>	Under Discussion
19	The scope of the outline Waste Management Plan	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	<p>The Applicant acknowledges the matters raised in BBC's relevant representations and has provided responses in the <b>Applicant's Responses to Relevant Representations [REP1-055]</b>. The Applicant trusts these responses provide the clarity that BBC are seeking.</p> <p>The Applicant will continue to consult with BBC on this matter.</p>	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
20	The scope of the outline Surface Water Management Plan	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant acknowledges the matters raised in BBC's relevant representations and has provided responses in the <b>Applicant's Responses to Relevant Representations [REP1-055]</b> . The Applicant trusts these responses provide the clarity that BBC are seeking.  The Applicant will continue to consult with BBC on this matter.	Under Discussion
21	The scope of the outline Archaeological Mitigation Strategy	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant acknowledges the concerns raised by BBC and updated the <b>oAMS [REP1-048]</b> at Deadline 1 to address some matters raised, and has provided clarity on other matters in the <b>Applicant's Responses to Relevant Representations [REP1-055]</b> .  The Applicant will remain in discussion with BBC on this matter.	Under Discussion
22	The scope of the outline Heritage Enhancement Strategy	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant has updated the <b>oHES [REP1-050]</b> in response to BBC's comment at Deadline 1. The Applicant trusts this update clarifies the matter raised by BBC.	Under Discussion
23	The approach to mitigation for Site Preparation Works	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant is not aware of any specific comments that BBC has made in relation to the scope of mitigation proposed for the Site Preparation Works, but will continue to consult with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
<b>Topic: Project Benefits</b>				
24	The benefits of the Scheme set out in Section 5 of the Planning Statement.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant. Central to this discussion is the matter of what elements of the Scheme will remain in perpetuity.	The Applicant notes this comment. The benefits of a Scheme are not necessarily contingent on those benefits being provided ' <i>in perpetuity</i> ' once the Scheme is decommissioned and ended. It is acceptable for benefits to be recognised even where such benefits may be time-limited; the weight given to such positive benefits in the planning balance is the pertinent matter, rather than whether or not they are positive.	Under Discussion
<b>Topic: Landscape and Visual</b>				
25	The study area and methodology used for the landscape and visual impact assessment.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant is not aware of any specific comments in BBC's relevant representation which challenges or raises questions on either the study area or methodology used for the landscape and visual impact assessment. Nonetheless, the Applicant will continue to engage with BBC on this matter to understand their concerns.	Under Discussion
26	The baseline data for the landscape and visual impact assessment.	BBC agree in principle with the landscape character areas and approach to identifying representative viewpoints and visual receptors for the purposes of the	The Applicant welcomes that BBC agree in principle with the baseline data. The Applicant not aware of any specific comments in BBC's relevant representation that relate to additional	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		assessment subject to comments made in the RR.	landscape character areas not considered in the baseline, or additional viewpoints not assessed. Nonetheless, the Applicant will continue to engage with BBC on this matter to understand their concerns.	
27	The measures proposed to mitigate landscape and visual effects.	BBC raised points of clarity etal in relation to this matter, with specific reference to the setting of heritage assets as identified, within their RR which requires address by the Applicant.	<p>The Applicant notes that paragraph 6.15 of BBC's relevant representation states that: "<i>The landscape proposals are tailored to the location and required functions of each part of the Scheme, noting that these change across the Site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where possible, especially for visual receptors, at the edges of settlements, and along routes connecting settlements.</i>"</p> <p>The Applicant notes that BBC's comment opposite relates to the setting of heritage assets, which is a different consideration than the mitigation of landscape and visual effects.</p> <p>The Applicant will continue to consult with BBC on this matter to understand their specific concerns.</p>	Under Discussion
28	The conclusions in respect of the assessment of landscape and visual effects.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant has set out responses to the points raised by BBC in its <b>Response to Relevant Representations [REP1-055]</b> , and will continue to consult with BBC to reach agreement on the	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
			conclusions of the landscape and visual assessment.	
<b>Topic: Glint and Glare</b>				
29	The conclusions in respect of the glint and glare assessment	BBC has raised a query in relation to the assessment of Thurleigh Airfield and Little Staughton Airfield, which appear to be omitted from the Applicant's glint and glare assessment. On the basis that it has subsequently been addressed by the Applicant, BBC are otherwise satisfied with the assessment subject to the required mitigation being secured, and will be providing no further comment during the Examination.	The Applicant updated the <b>glint and glare assessment [REP1-016/023]</b> at Deadline 1 to include both Bedford Aerodrome and Little Staughton Airfield. The updated assessment has highlighted that all impacts upon the airfields fall in line with FAA guidance and are acceptable and not significant.	Matter Agreed
<b>Topic: Cultural Heritage</b>				
30	The study area and methodology used for the assessment of impacts on the historic environment.	BBC raised points of clarity et al in relation to this matter within their RR which requires address by the Applicant.	The Applicant notes this comment and will continue to engage with BBC on this matter to understand their concerns.	Under Discussion
31	The baseline data for the historic environment.	BBC raised points of clarity et al in relation to this matter within their RR which requires address by the Applicant.	The Applicant notes this comment and will continue to engage with BBC on this matter to understand their concerns.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
32	The measures proposed to mitigate impacts on the historic environment.	BBC raised points of clarity etal in relation to this matter, with specific reference to the setting of heritage assets as identified (All Saint's Church), within their RR which requires address by the Applicant.	<p>The Applicant notes this comment and has provided responses to the matters raised in BBC's relevant representation in the <b>Response to Relevant Representations [REP1-055]</b>.</p> <p>The Applicant notes the Council's comments that further detailed discussions will be required with regard to the <b>outline Archaeological Mitigation Strategy [APP-166]</b> and are committed to working in consultation with BBHET as to the detailed design of the Scheme and implementing alternative mitigation measures where No Dig solutions are not feasible.</p>	Under Discussion
33	The conclusions in respect of the assessment of effects on the historic environment.	BBC is in in-principle agreement with the conclusions of the assessment of effects on the historic environment, with the singular area of disagreement being the setting impacts to the All Saints Church at Little Staughton. BBC raised points of clarity etal in relation to this matter, with specific reference to the setting of heritage assets as identified, within their RR which requires address by the Applicant.	<p>The Applicant has provided a response to BBC's comments in relation to All Saints Church at Little Staughton in its <b>Responses to Relevant Representations [REP1-055]</b>. The Applicant has reached a different professional opinion on the impact to the setting of the church (in EIA terms), but notes that BBC and the Applicant are not far apart in the level of harm arising – BBC consider there to be less than substantial harm at the mid-point of the scale – the Applicant considers there to be less than substantial harm at the low-to-mid point of the scale.</p> <p>The Applicant has provided further explanation to BBC on its opinion in</p>	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
			relation to the level of effect to All Saints Church, and will continue to discuss the matter with BBC to see if a common position can be reached.	
<b>Topic: Archaeology</b>				
34	The Applicant's approach to archaeological investigation.	<p>BBC is satisfied that the first phases of archaeological evaluation have been undertaken appropriately, but are awaiting the final report for Site B.</p> <p>BBC has requested further phases of archaeological investigation prior to commencement on Site, and is seeking confirmation that this is adequately secured through the draft DCO.</p> <p>This matter remains under discussion.</p>	<p>The Applicant notes this comment. The final trial trench evaluation reports for Sites B and D have been submitted alongside this SoCG at Deadline 2.</p> <p>The Applicant is committed to further archaeological research and investigation prior to construction of the Scheme, which in the first instance would involve the second phase of trial trenching which, as outlined in paragraph 5.3.1 of the <b>oAMS [APP-166]</b> 'would be undertaken in line with archaeological brief jointly issued by CHET and BBHET'. The Applicant considers this to be adequately secured by the draft DCO, and that therefore the matters raised by BBC are addressed.</p> <p>The Applicant will continue to engage with BBC on this matter.</p>	Under Discussion
35	The conclusions of the assessments with respect to archaeology.	BBC is in agreement that the archaeological remains revealed to date are of no more than regional significance and do not represent an overriding constraint on the Scheme, but require the	The Applicant notes this comment. The final trial trench evaluation reports for Sites B and D have been submitted alongside this SoCG at Deadline 2.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		<p>final report for Site B to reach a final position. This matter remains under discussion.</p> <p>As set out elsewhere, further clarity is required in relation to the outline Archaeological Mitigation Strategy to confirm impacts can be avoided during all Phases of the Scheme.</p>		
<b>Topic: Ecology and Biodiversity</b>				
36	The study areas and methodology used for the assessment of ecological receptors and resources.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant is not aware of any specific comments in BBC's relevant representation which challenges or raises questions on either the study areas or assessment methodology used. Nonetheless, the Applicant will continue to engage with BBC on this matter to understand their concerns.	Under Discussion
37	The baseline data for the assessment of ecological receptors and resources.	<p>BBC acknowledges a broad survey base and welcomes updated ecology information, including 2025 bird data, but remains concerned that the baseline for some receptors may rely on incomplete survey coverage and insufficient information.</p> <p>BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.</p>	The Applicant acknowledges the matters raised in BBC's relevant representation and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> . The Applicant considers the survey data relied on for the assessment to be adequate, and will continue to consult with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
38	The measures proposed to mitigate impacts to ecological receptors and resources.	BBC broadly welcomes the proposed ecological mitigation and compensation, but some key measures are insufficiently detailed and not yet secured; further work is needed on species-specific mitigation (notably for farmland birds), lighting, habitat creation, monitoring, and long-term management/retention to ensure delivery.  BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant acknowledges the matters raised in BBC's relevant representation and has updated the <b>oCEMP [REP1-032]</b> and <b>oLEMP [REP1-040]</b> at Deadline 1 to address most of the issues raised. The Applicant will continue to consult with BBC on this matter.	Under Discussion
39	The conclusions in respect of the assessment of impacts and effects to ecological receptors and resources.	BBC agree with the Applicant's assessment in respect of statutory designated sites for nature conservation.  BBC has raised points of clarity in relation to some non-statutory designated sites, and protected species which requires address.	The Applicant acknowledges the matters raised in BBC's relevant representation and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> . The Applicant will continue to consult with BBC on this matter.	Under Discussion
40	The biodiversity net gain assessment.	BBC is broadly satisfied with the Applicant's approach to BNG, acknowledging that it is not mandatory for this Scheme. However, BBC has requested clarity around measures proposed to mitigate significant effects and measures proposed to support BNG; further detail on how BNG is secured through the draft DCO; and further clarity	The Applicant acknowledges the matters raised in BBC's relevant representation and has updated the <b>BNG report [REP1-052]</b> and <b>oLEMP [REP1-040]</b> at Deadline 1 to address most of the issues raised. The Applicant will continue to consult with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		with regard baseline condition data etal as set out in the RR.		
<b>Topic: Habitats Regulations Assessment</b>				
41	The Applicant's conclusion that the Scheme will not have adverse effects on the integrity of a European Site.	BBC will revert on this matter following review.	The Applicant notes this comment, and would highlight Natural England's position on this matter <b>[REP1-081]</b> .	Under Discussion
<b>Topic: Flood Risk and Drainage</b>				
42	The Applicant's Flood Risk Assessment.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant has provided responses to the matters raised by BBC in the Applicant's <b>Response to Relevant Representations [REP1-055]</b> . The Applicant notes BBC's position in their RR that most of the matters raised can be resolved at detailed design stage, potentially post-consent. The Applicant will continue to consult with BBC on this matter.	Under Discussion
43	The Scheme meets the requirements of the 'Sequential Test'.	BBC will revert on this matter following review.	The Applicant notes this comment and that no comment was made in this regard in BBC's LIR. The Applicant awaits BBC's comments on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
44	The Scheme meets the requirements of the 'Exception Test'.	BBC will revert on this matter following review.	The Applicant notes this comment and that no comment was made in this regard in BBC's LIR. The Applicant awaits BBC's comments on this matter.	Under Discussion
<b>Topic: Water Quality and Resources</b>				
45	The approach to assessing impacts and effects on the water environment.	BBC has raised concerns in its relevant representation regarding the potential for polluted run-off in the event of a fire at the BESS facility and the impact this could have on watercourses; and that the Environmental Incident Management and Pollution Prevention Plan should be provided at this stage rather than post-consent. Subject to these matters being addressed by the Applicant, BBC accepts the conclusions of the Applicants assessment of impacts to the water environment. Matter remains under discussion.	The Applicant has provided responses to the matters raised by BBC in the Applicant's <b>Response to Relevant Representations [REP1-055]</b> . The Applicant considers that these clarifications could resolve BBC's concerns on this matter.  The Applicant will continue to consult with BBC on this matter.	Under Discussion
46	Water Framework Directive Water Bodies	BBC consider the Applicant's WFD Assessment to be adequate, subject to the required mitigation being secured through the draft DCO. Subject to the agreed draft DCO, the matter remains under discussion.	The Applicant notes this comment, and considers the proposed mitigation is adequately secured by the requirements of the <b>draft DCO [REP1-005]</b> . The Applicant will await BBC's further comments on this matters.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
<b>Topic: Traffic and Transport</b>				
47	The study areas and methodology used for the assessment of traffic and transport impacts and effects.	BBC will revert on this matter following review.	<p>The Applicant notes BBC's comment from paragraph 11.14 of their relevant representation that: <i>"The Council are satisfied that a robust assessment methodology has been used to assess the impact of construction traffic on the highway and PRow network."</i></p> <p>The Applicant is not aware of any specific comments in BBC's relevant representation which challenges or raises questions on either the study area or assessment methodology used for the traffic and transport assessment. Nonetheless, the Applicant will continue to engage with BBC on this matter to understand their concerns.</p>	Under Discussion
48	The baseline data for the assessment of traffic and transport impacts.	BBC will revert on this matter following review.	The Applicant notes this comment and will continue to engage with BBC on this matter to understand their concerns.	Under Discussion
49	The measures proposed to mitigate traffic and transport impacts.	BBC has raised a number of concerns or points of clarity in relation to the mitigation of impacts, including further detail and commitments on visibility splays, access design, junction mitigation, staff travel/minibus provision, road safety	The Applicant acknowledges the matters raised in BBC's relevant representation and updated the <b>oCTMP [REP1-034]</b> at Deadline 1, alongside further explanation in the Applicant's <b>Response to Relevant Representations [REP1-055]</b> . The	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		audits, monitoring and highway authority approvals. BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	Applicant will continue to consult with BBC on this matter.	
50	The measures proposed to mitigate impacts on users of public rights of way.	BBC has raised a number of concerns about the Applicant's approach to PRoW. These concerns include matters in relation to route widths, specifications, closures, crossings, maintenance, enhancements and legal status.  BBC considers the PRoW Management Plan, access plans and draft DCO do not yet adequately protect users of PRoW.	The Applicant acknowledges BBC's concerns raised in its relevant representation in relation to users of public rights of way. The Applicant has updated the outline PRoW Management Plan and the oLEMP at Deadline 1 to provide greater detail and clarity to resolve BBC's concerns.  The Applicant will continue to consult with BBC on this matter.	Under Discussion
51	The conclusions in respect of the assessment of traffic and transport impacts and effects.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant notes this comment and will continue to consult with BBC on these matters.	Under Discussion
<b>Topic: Noise and Vibration</b>				
52	The conclusions in respect of the assessment of noise and vibration.	BBC will revert on this matter following review.	The Applicant acknowledges the matters raised in BBC's relevant representation and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> .	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
			The Applicant will continue to consult with BBC on this matter.	
<b>Topic: Air Quality</b>				
53	The conclusions in respect of the assessment of air quality.	BBC will revert on this matter following review.	The Applicant acknowledges the matters raised in BBC's relevant representation and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> . The Applicant will continue to consult with BBC on this matter.	Under Discussion
<b>Topic: Ground Conditions</b>				
54	The conclusions in respect of the assessment of ground conditions.	BBC will revert on this matter following review.	The Applicant acknowledges the matters raised in BBC's relevant representation and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> . The Applicant will continue to consult with BBC on this matter.	Under Discussion
<b>Topic: Land Use and Soils</b>				
55	The methodology used for the assessment of impacts and effects on land and soils.	BBC raised points of clarity etal in relation to this matter within their RR (e.g density of survey points) which requires address by the Applicant.	The Applicant acknowledges the matters raised in BBC's relevant representation and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> .	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
			The Applicant will continue to consult with BBC on this matter.	
56	The survey data for the assessment of land and soils.	BBC raised concerns in its relevant representation regarding the adequacy of the survey data for land and soils, and whilst it enables an assessment of the worst-case project effects, it hinders development of a detailed soil management plan. BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant acknowledges that whilst the approach taken to classifying soils is appropriate for planning and EIA purposes, the absence of data could hinder the final detailed soil management strategy. The Applicant updated the <b>oSMP [REP1-044]</b> for submission at Deadline 1 to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase, in order to inform the final Soil Management Plan.  The Applicant will continue to consult with BBC on this matter.	Under Discussion
57	The measures proposed to mitigate impacts on soils.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant has updated the <b>oSMP [REP1-044]</b> for submission at Deadline 1 to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase, in order to inform the final Soil Management Plan.  The Applicant will continue to consult with BBC on this matter.	Under Discussion
58	The conclusions in respect of the assessment of land and soils.	BBC consider the overall conclusions broadly meet professional judgement regarding the significance of residual effects.	The Applicant acknowledges the matters raised by BBC in its relevant representation, and has provided a response in the Applicant's <b>Response to Relevant Representations [REP1-055]</b> ,	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		BBC has raised a number of points of clarification in its relevant representation, including in relation to the claimed benefit on soil resources, and the impact of the Scheme resulting from proposed areas of woodland and hedgerow that require address.	as well as through oral submissions at ISH2 [REP1-059]. The Applicant trusts these clarifications are satisfactory to BBC, and will continue to consult with them on these matters.	
<b>Topic: Socio Economics</b>				
59	The conclusions in respect of the assessment of socio-economics.	BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant has provided responses to the matters raised by BBC in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> , to be submitted at Deadline 1. The Applicant will remain in discussion with BBC on this matter.	Under Discussion
<b>Topic: Climate Change</b>				
60	The methodology used for the assessment of climate change impacts and effects.	BBC welcome the approach taken by the Applicant in carrying out the greenhouse gas assessment, and the methodology applied to the Climate Change Risk Assessment (CCRA) and note that it is consistent with guidance issued by ISEP.	The Applicant welcomes agreement with BBC on this matter.	Matter Agreed
61	The baseline data for the assessment of climate change impacts.	BBC note that an inconsistent use of historic climate data is apparent. The current baseline uses data for Bedford for	The Applicant acknowledges the noted inconsistency in the presentation of the historic climate data within the Climate	Matter Agreed

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		the period 1991-2020 while the future baseline uses data for the same location from 1981-2010. This inconsistency is unlikely to compromise the overall outcome of the CCRA, but will be addressed by the Applicant, on this basis – matter agreed.	Change Risk Assessment (CCRA). Upon review, the Applicant confirms that this inconsistency is an error in reporting. The 1991-2020 dataset has been consistently used to calculate both the current and future climate baselines, in line with the methodology and guidance issued by ISEP.	
62	The measures proposed to mitigate climate change impacts.	BBC broadly agree with the measures proposed to mitigate impacts on climate change, but request further measures should peat be discovered on site during construction.  BBC will revert on this matter following review on the basis that it could then be agreed.	The Applicant acknowledges the matters raised in BBC’s relevant representation and updated the <b>oCEMP [REP1-032]</b> at Deadline 1 to include mitigation measures for peat. The Applicant trusts these clarifications are satisfactory to BBC, and considers this matter can be marked as agreed.	Under Discussion
63	The conclusions in respect of the assessment of climate change impacts and effects.	BBC broadly agree with the conclusions of the climate change assessment, but have requested clarifications in relation to the operational (replacement) phase, the use of the BESS in a grid balancing capacity, and the assessed counterfactual scenario.  BBC will revert on this matter following review.	The Applicant acknowledges the matters raised in BBC’s relevant representations and has provided responses in the Applicant’s <b>Responses to Relevant Representations [REP1-055]</b> . The Applicant considers the assessment adequately addresses the matters raised by BBC.  The Applicant will continue to consult with BBC on this matter.	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
<b>Topic: Human Health</b>				
64	The conclusions in respect of the Scheme's effects on human health.	BBC is satisfied that subject to the required mitigation measures being secured through the draft DCO, the Scheme does not pose a significant risk to human health as reviewed in their RR.	The Applicant notes this comment and suggests that this matter could be moved to 'Agreed' at the next deadline.	Under Discussion
<b>Topic: Waste</b>				
65	The Applicant's assessment of waste impacts.	BBC has no specific objection in relation to waste but has raised general concerns in its relevant representation over replacement / decommissioning waste and recycling.  BBC raised points of clarity etal in relation to this matter within their RR which requires address by the Applicant.	The Applicant acknowledges the matters raised in BBC's relevant representations and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> . The Applicant trusts these responses provide the clarity that BBC are seeking over the replacement phase.  The Applicant will continue to consult with BBC on this matter.	Under Discussion
<b>Topic: Major Accidents and Disasters</b>				
66	The conclusions in respect of major accidents and disasters.	BBC broadly agree with the conclusions in respect of major accidents and disasters.  BBC has raised points of clarification in relation to contaminated firewater breach	The Applicant acknowledges the matters raised in BBC's relevant representations and has provided responses in the Applicant's <b>Responses to Relevant Representations [REP1-055]</b> . The	Under Discussion

Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
		scenarios and evidence of containment capacity.	Applicant trusts these responses provide the clarity that BBC are seeking. The Applicant will continue to consult with BBC on this matter.	
<b>Topic: Electromagnetic Fields</b>				
67	The conclusions in respect of the Scheme's impacts arising from electromagnetic fields.	BBC has no comments regarding the impact from electromagnetic fields.	The Applicant notes this comment.	Matter Agreed
<b>Topic: Cumulative Effects</b>				
68	The scope of other developments assessed for potential cumulative effects.	BBC will revert on this matter following review.	The Applicant notes this comment and awaits further comments from BBC.	Under Discussion
69	The conclusions of the assessment of cumulative effects.	BBC will revert on this matter following review.	The Applicant notes this comment and awaits further comments from BBC.	Under Discussion
<b>Topic: Compulsory Acquisition</b>				
70	The land rights sought by the Applicant through the	BBC are currently reviewing the Applicant's Land and Rights Negotiation Tracker [PDA-013/014] and Book of	The Applicant notes this comment and awaits further comments from BBC.	Under Discussion

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Ref.	Summary of Matter	Bedford Borough Council Position	Applicant Position	Status
	draft DCO insofar as they relate to BBC.	Reference [PDA-011/012] and will revert as part of the Examination.		

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## APPENDIX A

### BSSL Cambsbed 1 Ltd

Name:

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Signature:

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Position:

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On behalf of:

BSSL Cambsbed 1 Ltd

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Date:

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### Bedford Borough Council

Name:

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Signature:

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Position:

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On behalf of:

Bedford Borough Council

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Date:

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