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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
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BY ONLINE SUBMISSION ONLY

22nd May 2026

Dear Sir/Madam

DEADLINE 3 – RESPONSES TO EXQ1

Project: East Park Energy

Applicant: BSSL Cambsbed 1 Limited

Your Ref: EN010141

Huntingdonshire District Council (HDC/the Council) has reviewed the Applicant's submission documents and has submitted the following to the Examining Authority (ExA) to date:

- [RR-494] Relevant Representations (14 January 2026);
- [REP1-076] Written Representations (7 April 2026);
- [REP1-077] Summary of RR exceeding 1500 words (7 April);
- [REP1-078] Local Impact Report (7 April 2026); and
- [REP2-050] Comments on any updated or additional documents from the applicant and [REP2-051] Comments on responses to RRs (28th April 2026).

The Council has reviewed the Applicant's response [REP2-043] to the Local Impact Report [REP1-078] and is currently engaged in ongoing discussions with the other Host Authorities and the Applicant to consider the matters and issues raised. This work is ongoing and is reflected in the draft Statement of Common Ground [REP2-037].

The Council's responses to the Examining Authority's Written Questions 1 (ExQ1), insofar as they are directed to HDC and/or the Host Authorities, are set out in the table below.

I trust that this information is of assistance to you. Should you wish to discuss this matter further then please contact [REDACTED] by email: [REDACTED]@huntingdonshire.gov.uk.

Yours Sincerely

[REDACTED]

██████████rr – Head of Planning, Infrastructure & Public Protection (Chief Planning Officer)
Development Services
Corporate Delivery
Huntingdonshire District Council

22nd May 2026

Response to ExA's First Written Questions (ExQ1)

This document sets out the response to the Examining Authority (ExA)'s First Written Questions (ExQ1) by Huntingdonshire District Council (HDC). The table below sets out the topic, question number and HDC's response.

ExQ1	Question to:	Question:	HDC Response:
2. Air Quality and emissions			
Q1.2.1	Local Authorities	Compliance with Local Policies Paragraph 7.13.16 of the Planning Statement [APP-031] states that the proposed development is in compliance with local policies in respect of Air quality. Do the local authorities agree?	The proposed development complies with Policies LP14 (Amenity) and LP36 (Air Quality) of Huntingdonshire's Local Plan to 2036, subject to implementation of the measures set out in the outline management plans covering construction, operational and decommissioning which would mitigate impacts on local air pollution.
3. Biodiversity, ecology and natural environment (including Habitats Regulations Assessment (HRA))			
Q1.3.2	HDC	BNG Monitoring Please outline any comments on the use of a Planning Performance Agreement to facilitate the resourcing of BNG monitoring in lieu of a S106 agreement.	The Host Authorities do not consider that a Planning Performance Agreement (PPA) is an appropriate legal and planning mechanism to resource and financially secure Biodiversity Net Gain (BNG) and/or any other monitoring fee in lieu of a Section 106 agreement. In the context of UK planning law, PPAs are voluntary agreements between Parties; they are generally not legally binding contracts in the traditional, enforceable sense. Consequently, PPAs do not offer a Local Planning Authority (LPA) financial security against a scheme. In particular, a PPA does not create planning obligations, nor does it run with the land or bind successors in title i.e. PPAs have no mechanism to be enforceable against an application/scheme allowing for enforcement if in breach. PPAs are in a broad sense a Memorandum of Understanding between Parties; it is a project management and cost recovery tool intended to support the handling of an application through the consenting process.

ExQ1	Question to:	Question:	HDC Response:
			<p>Rarely are PPAs extended for the life of a scheme post-consent, in this case 40-years.</p> <p>By contrast, a Section 106 agreement is a statutory planning obligation that is legally enforceable and capable of binding the land and future owners.</p> <p>In paragraph 6.106 of HDC’s Local Impact Report [REP1-077], it was suggested that a fee for the monitoring of BNG, ecology and landscape mitigation works could be secured through a Section 106 agreement or the proposed Landscape and Ecological Management Plan (oLEMP) Steering Group mechanism set out in section 4.2 of the oLEMP.</p> <p>An alternative approach could therefore be to include an agreed monitoring contribution within the Terms of Reference of the oLEMP and to introduce a new article within the draft DCO to secure the allocation of funding to HDC and the other Host Authorities for the Steering Group. This approach has been implemented on the Beacon Fen Energy Park project, and the host authorities will engage in discussions with the Applicant to explore this approach if the Applicant is not willing to pursue a Section 106 agreement.</p> <p>The Host Authorities note that the responsibility for BNG monitoring, as tabled by the Applicant, would fall jointly on the Host Authorities and Wildlife Trust (as part of the proposed oLEMP Steering Group). While the Host Authorities are supportive of thisGroup, it is suggested that this falls outside the traditional remit of LPA’s and, as the Steering Group mechanism is proposed by the Applicant to monitor mitigation, delivery, and enhancement measures of the Scheme, it is felt that securing unequivocal financial security for the LPAs to enable this role is not unreasonable, specifically in light of the scale and duration of the Scheme.</p> <p>The Host Authorities note that a similar matter has been raised through their separate representations regarding the request for other monitoring fees (say a Travel Plan and PRow) along the same justification. They remain open to discussion with the Applicant to explore approaches should the Applicant not be willing to pursue a Section 106 agreement on the basis that such an Agreement addresses the concerns raised above.</p>

ExQ1	Question to:	Question:	HDC Response:
Q1.3.7	Local Authorities	<p>Biodiversity Net Gain Report [APP-168]</p> <p>Paragraph 2.3.8 references that the Bedfordshire and Cambridgeshire's Local Nature Recovery Strategies were due to be published in December 2025. Have they been produced, and what implications, if any, have they for the proposed development?</p>	<p>The Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS) was published on 23rd December 2025. The strategy is available to read or download from Local Nature Recovery Strategy (LNRS) - Cambridgeshire & Peterborough Combined Authority (CPCA).</p> <p>It sets out the priorities for nature recovery across Cambridgeshire and Peterborough, identifying LNRS priority habitats and LNRS priority species and targeted actions. A LNRS Habitat Map has been produced to show the mappable measures for LNRS priority habitats, showing where habitats should be created or existing habitats enhanced. The published LNRS confirms that parts of the draft order limits lie within local priority habitats and mapped nature-recovery areas.</p> <p>The applicant has already amended the Biodiversity Net Gain Report (Tracked) P02 [REP1-053] to reflect the published status of the LNRS.</p>
Q1.3.13	Natural England Cambridgeshire County Council Huntingdonshire District Council	<p>Baseline ecological survey coverage</p> <p>Are NE, CCC and HDC satisfied with the coverage of the ecological surveys undertaken to inform the baseline conditions of the ecology and nature conservation assessment within the ES [APP-043]?</p>	<p>HDC is generally satisfied with the overall coverage of the ecological surveys undertaken to inform the baseline conditions within the ES. However, concerns were raised at paragraphs 6.68 and 6.85–6.91 of the Local Impact Report [REP1-077] regarding the adequacy of certain protected species surveys, including those for ground-nesting birds, bats, hazel dormouse, water vole and otter. In particular, these concerns relate to how any limitations in the data have been addressed and the extent to which they may influence the robustness of the assessment conclusions.</p> <p>The Applicant has responded to these points and provided further clarification within the 'Applicant Response to Local Impact Reports P01' [REP2-043]. HDC is currently reviewing this information, and any areas of ongoing disagreement regarding the coverage or adequacy of ecological surveys will be reflected in the Draft Statement of Common Ground.</p>
4. Cultural Heritage			
Q1.4.8	Local Authorities	<p>Conservation Area Character Appraisals or Management Strategies</p> <p>Please provide any character appraisal or management strategies that relate to the</p>	<p>The applicant has identified Conservation Areas within a 3km study as set out in paragraph 6.6.66 of the ES Chapter 6 Cultural Heritage and Archaeology P01 [APP-042]. The list below identifies those Conservation Areas within HDC's boundary which have character assessment statements:</p>

ExQ1	Question to:	Question:	HDC Response:
		conservation areas within the vicinity of the proposed development.	<ul style="list-style-type: none"> - Stonely Conservation Character Statement (June 2003) - Kimbolton Conservation Area Character Statement (January 2003) - St Neots Conservation Area Character Assessment (October 2006) <p>The character assessment statements can be found here: Conservation Area Documents - Huntingdonshire.gov.uk</p> <p>Great Staughton and Staughton Highway Conservation Areas are in closest proximity to the proposed development but do not have character assessment statements.</p>
5. Draft Development Consent Order (dDCO) & Explanatory Memorandum			
Q1.5.2	Local Authorities	<p>Article 8 Disapplication and modification of legislative provisions</p> <p>Article 8(4) seeks to disapply the Community Infrastructure Levy Regulations 2010. Do any of the Local authorities have a CIL charging schedule in place, and would the proposed development be caught by the charging schedule?</p>	HDC is a CIL Charging Authority however the proposed development would not be CIL liable. Accordingly, HDC has no objection to Article 8(4) which seeks to disapply CIL.
6. Landscape and visual impact assessment			
Q1.6.4	Local Authorities	<p>Chapter 5 Landscape and Visual [APP-041]</p> <p>Paragraph 5.3.6 indicates that the local authorities have not commissioned an external qualified resource to comment on the LVIA. Has this now been commissioned jointly by the local authorities?</p>	As set out in both HDC's Relevant Representation [RR-494] and Local Impact Report [REP1-077], AECOM has been jointly appointed by the three Host Authorities under a Memorandum of Understanding, and with the agreement of the Applicant. AECOM is acting as an external consultant on behalf of all three authorities to assess landscape and visual impact matters, including review of the LVIA.