



EAST PARK ENERGY

East Park Energy

EN010141

**Applicant's Response to Deadline 3
Submissions – Host Authorities, Statutory
Environmental Bodies and Statutory
Undertakers**

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Forms and Procedure) Regulations 2009

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1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This document sets out the responses of BSSL Cambsbed 1 Limited ('the Applicant') to the Deadline 3 submissions submitted by Host Authorities, Statutory Environmental Bodies, and Statutory Undertakers in relation to the Development Consent Order (DCO) application for the East Park Energy project (the 'Scheme').
- 1.1.2 The documents submitted with the application and at previous examination deadlines are referenced using the reference number assigned by the Planning Inspectorate (PINS) i.e. **[APP-XXX]**. Where application documents have been updated based on feedback received at Deadline 3, this response document sets out that the relevant updated document is "**[as updated alongside this submission]**".
- 1.1.3 The Applicant has generally only elected to respond to comments raised at Deadline 3 where matters are not yet agreed.

1.2 Note about National Policy Statements

- 1.2.1 Section 1.6 of the 2026 NPS EN-1 confirms that for schemes accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect. East Park Energy was accepted for examination in October 2025 prior to the final publication of the 2025 amendments. The 2024 NPSs therefore have effect for decision making.
- 1.2.2 All references to the NPSs in this document made by the Applicant are to the 2024 NPSs unless stated otherwise.
- 1.2.3 The Applicant has prepared a separate **Note on updated National Policy Statements EN-1, EN-3 and EN-5 [PDA-018]**.

2.0 RESPONSE TO HOST AUTHORITIES

2.1 Response to Bedford Borough Council

Table 1: Response to Bedford Borough Council Response to ExQ1 (REP3-078)

Our Ref.	Ref.	BBC Comments	Applicant Response
BBC-D3-01	Q.1.3.2	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. Rarely are PPAs extended for the life of a scheme post-consent, in this case 40-years. By contrast, a Section 106 agreement is a statutory planning obligation that is legally enforceable and capable of binding the land and future owners.	The Applicant is consulting with the host authorities (on a without prejudice basis) about a potential PPA or other obligation / side-agreement to cover the post-consent stage. The Applicant notes however that there has been a material recent change in relevant legislation that enables the host authorities to recover costs incurred in providing services in relation to NSIPs, including funding for the post-decision stage and implementation of the consent. Government has recently amended the Infrastructure Planning (Fees) Regulations 2024 and that as of the 8th June 2026, host local authorities for NSIPs now have a statutory route to recover all reasonable costs incurred in relation to NSIP applications. The guidance can be viewed here: https://www.gov.uk/guidance/planning-act-2008-infrastructure-planning-fees-regulations-2010-cost-recovery-by-the-planning-inspectorate-and-public-authorities The guidance states that: <i>“Cost recovery through the charging of fees enables specified public authorities to recover the costs of providing their services in relation to NSIP applications/proposed applications and is designed to resource public bodies so they can provide reliable, high-quality advice on the Pre-application, Acceptance, Pre-examination, Examination, Decision, and Post-decision/</i>

Our Ref.	Ref.	BBC Comments	Applicant Response
		In BBC's Local Impact Report [REP1-071] Matter 37, 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 as set out in section 4.2 of the oLEMP. The other Host Authorities set out a similar position in their Local Impact Report. (Cambridgeshire County Council's Local Impact Report [REP1 075], paragraph 2.3.41). An alternative approach could be to include an agreed monitoring contribution within the Terms of Reference of the oLEMP and to introduce Page 3 of 10 a new article within the draft DCO to secure the allocation of funding to CCC and the other Host Authorities for the steering group. The host authorities will engage in discussions with the Applicant and the other Host Authorities to explore this approach if the Applicant is not willing to pursue a Section 106 agreement. 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 the proposed oLEMP Steering Group). While the Host Authorities are supportive of this group, 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.	<u>implementation stages</u> of NSIP applications/proposed applications." [emphasis added] For the post-decision and implementation stage the guidance states that the following services can be charged for: <i>"Services provided to the applicant, the Secretary of State or any other person (for example, the Local Planning Authority), after the decision is made by the Secretary of State or in relation to implementation of the decision, such as the discharge of requirements."</i> The host authorities can therefore recover all reasonable costs, in accordance with a charging schedule that must be prepared by the host authorities and published by them transparently setting out the relevant services for which they are charging. The Applicant notes that in relation to the implementation of a decision, this could include for reviewing management plans, reviewing monitoring reports, attendance at meetings such as for steering groups, carrying out site inspections, commissioning specialist technical input (if required) or other matters. This is a non-exhaustive list of examples. The Applicant considers that this provides appropriate security for the host authorities, regardless of whether a PPA or other side-agreement is also agreed separately. The host authorities can recover costs under the statutory regime, with host authorities able to recover any unpaid fees from the Applicant as a civil debt, should fees not be paid. The Applicant notes the host authorities' comments stating that a PPA is <i>"not legally binding contracts in the traditional, enforceable sense"</i>. Depending on its terms and the parties' intention to create legal relations, a PPA may constitute a binding private agreement enforceable through ordinary contractual remedies.

Our Ref.	Ref.	BBC Comments	Applicant Response
		The Host Authorities note that a similar matter has been raised through their separate representations regarding the request for other monitoring fees (for example a Travel Plan and PRow) along the same justification. We 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.	Whilst a PPA would not bind the land, recent statutory reforms provide a separate statutory mechanism for cost recovery. Where a host authority has published the requisite charging schedule by the time an application to discharge a requirement is made, it may recover the reasonable costs of providing the relevant post-decision and implementation services. A transfer of the project would not, of itself, prevent the host authorities from using that mechanism to recover the costs incurred in determining subsequent discharge applications. The Applicant notes the host authorities' concerns in relation to BNG monitoring. However, the Applicant's position remains that the provision and monitoring of BNG is not a statutory requirement for the Scheme. Therefore, the approval of the final LEMP, as well as the monitoring implementation and compliance with the terms LEMP is not different from any other condition and should not be considered to fall outside the host authorities' traditional remit nor justify the requirement for additional funds to be secured by way of a Section 106 agreement. The Applicant believes this is also the case in respect of any mitigation proposed to be secured by way of requirement within the draft DCO (which includes measures in respect of public rights of way management or construction, operation and decommissioning traffic). As a matter of policy, a local authority should not require a section 106 obligation to duplicate something that can (and already is) secured by a planning condition, unless there is a clear justification, which the Applicant does not believe is the case here.

Our Ref.	Ref.	BBC Comments	Applicant Response
BBC-D3-02	Q1.3.7	The Bedfordshire Local Nature Recovery Strategy (LNRS) was formally adopted (29 January 2026) and has been published. Local Plans need to take account of LNRS but the Council's current Local Plan 2030 does not reflect this strategy, there is no statutory requirement to do so. It is the intent of LNRS to encourage proposed development to create linkages/ corridors between existing and identified habitats as shown in the LNRS' local habitat map. It is consequently suggested that the Applicant undertakes a mapping exercise to ascertain if any 'Areas of particular importance for biodiversity – Local Wildlife Sites' and/or 'Areas that could become important for biodiversity' as classified in the LNRS fall within the Scheme's Red Line boundary, and if so, what mitigation measures may/ would need to be addressed. A cursory review would suggest that the Scheme is not affected.	The application of the LNRS is addressed at section 4.1.6 of the BNG Report [REP1-052]. Changes made to the BNG Report [REP1-052] at Deadline 1, including inclusion of the LNRS, resulted in a slight decrease in the predicted biodiversity net gain from 79.51% to 77.85% in habitat units and no change in hedgerow or watercourse units.
BBC-D3-03	Q1.3.13	BBC is generally satisfied with the overall coverage of the ecological surveys undertaken to inform the baseline conditions within the ES. However, concerns were raised in BBC's Local Impact Report [REP1-071] Matters 26, 27, 35 inter alia 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 The Applicant has responded to these points and provided further clarification within the 'Applicant Response to Local Impact Reports P01' [REP2-043]. BBC	The Applicant notes this comment and is continuing to engage with BBC in relation to ecology and biodiversity matters.

Our Ref.	Ref.	BBC Comments	Applicant Response
		is currently reviewing this information, and any areas of ongoing disagreement regarding the coverage or adequacy of ecological surveys will be reflected in an updated Draft Statement of Common Ground.	
BBC-D3-04	Q1.11.13	In terms of 'initiatives', the Council continues to express their concern that while the Applicant remains in discussion with the Host Authorities regarding the oCTMP, how this management plan is to be delivered in consultation with and enforced by the Host Authorities regarding LPA's resources has not been resolved. To this end, the Host Authorities have requested a Travel Plan Monitoring Fee for each Phase to ensure compliance and 'best practice'. This remains in discussion as noted elsewhere in this response.	The Applicant considers the monitoring of a travel plan to be a potentially relevant service that the host authorities can charge for under the Infrastructure Planning (Fees) Regulations 2010, as set out in the response above reference BBC-D3-01.
BBC-D3-05	Q.1.12.6	a) As a general observation, BBC note that there is low head water pressure to the north of the Borough in the vicinity of the Scheme. Consequently, irrespective of the water storage tanks strategy to be provided by the Scheme to address any BESS fire, it is suggested that the Applicant investigates if there is sufficient water pressure to enable any joint Fire and Rescue Services response to a BESS fire should this be part of a secondary approach within their strategy; that such a strategy is not reliant on such water for sustained periods of time; and, that the Applicant has resolved this concern is their outline Battery Safety Management Plan [APP-162]. See their statement in [APP-162] para 4.3.1 'depending on available water supply'. b) Further, the Applicant is referred to Anglian Water Services Ltd. Representations [RR-069] where they state 'Water Resources and Water Recycling/ Sewerage	a) The Applicant has an in-principle agreement for a connection with Anglian Water at their pump house (located within the Order limits) just to the north of Site D on the B645. At present, this connection would provide supply to the substation building, and the storage, operations and maintenance building only, and would not supply the fire water storage tanks. It is not at this stage the intent of the Applicant to provide mains-connected hydrants to provide firefighting water at the BESS, with the outline Battery Storage Management Plan [APP-162] allowing for <u>either</u> static water storage tanks or pressure-fed (pump-driven) hydrants. If hydrants were to be pursued in addition to the water storage tanks, then it is assumed a supply would be provided either from the mains water pipe which crosses Site D, or from the aforementioned pump house along the B645. The Applicant is satisfied that a suitable water supply has been (and will be) provided for firefighting purposes.

Our Ref.	Ref.	BBC Comments	Applicant Response
		Services Water supply AWS has previously submitted representations stating the Project is proposed within an area of serious water stress designated by the Environment Agency,. The Scoping Opinion issued by the Planning Inspectorate stated under Ref. ID3.39 “The ES should provide details relating to the water supply and demand requirements during the construction and operational phases of the Proposed Development (including in the context of managing BESS fire risk)”. The Applicant should confirm that this matter has been concluded with Anglian Water and/or is addressed within the oBSMP. c) In order to ensure that works relating to the fire management strategy are in place prior to the delivery of any BESS batteries on Site, it is suggested that the delivery and completion of all works related to the water tanks, detention pond, earthwork bunding, firefighting equipment, testing, etal are explicitly delivered as the first phase of a programme of works for the BESS facility – to be set out within the outline Battery Safety Management Plan. d) In light of the statement [APP-162] para 4.3.8 ‘water runoff is likely to contain higher levels of pollutants’ it is noted that the outline Decommissioning Environmental Management Plan [APP-158] does not specifically address thew removal of the drainage lagoon, potentially contaminated sub-soil, and address of contaminants that may be residual within the lagoon. This needs address by the Applicant.	b) The Applicant is proposing to tanker water to site from a commercial or licenced source during construction for uses such as dust suppression, earthworks, concrete mixing, wheel washing, etc. Rainwater harvesting will also be used where practicable. The Applicant has accounted for the water requirements of the Scheme within ES Vol 2 Appendix 15-1 [REP2-021] which identifies water usage requirements in Tables 9 and 11 for the construction and operation phases respectively. The Applicant has updated ES Vol 2 Appendix 9-1 [as updated alongside this submission] to include the water tanker vehicle movements in the estimated traffic generation for the construction phase. The BESS water storage tanks would initially be filled from water tankered to the site from a commercial or licenced source (as during the construction phase), with water levels then expected to be maintained via rainwater harvesting throughout the operational phase. Rainwater harvesting is proposed at the East Park Substation building and at the Storage, Operations and Maintenance Building. Separately, the Applicant has an in-principle agreement for a piped connection to the public water network with Anglian Water for the more limited water requirements in the operational phase. This is intended to supply operational needs such as welfare within substation buildings and firefighting. It is not intended to supply construction or maintenance water needs and therefore the Applicant does not intend to complete a Water Resource Assessment at this time. c) The Applicant agrees with the objective of ensuring that appropriate fire-safety and environmental protection infrastructure is available before battery-containing BESS equipment is brought onto the BESS area. The construction

Our Ref.	Ref.	BBC Comments	Applicant Response
			sequencing for the BESS is set out at paragraphs 3.1.1 and 3.1.2 of the outline Battery Safety Management Plan (oBSMP) [APP-162]. This identifies that the BESS will be constructed in a controlled sequence whereby the civil works would be completed first prior to delivery and installation of battery storage units. The Applicant has however amended the following paragraphs of the oBSMP [as updated alongside this submission] to provide additional detail and clarity on the construction sequencing: 3.1.1, 3.1.2, 4.3.3, 4.5.5 and 5.1.9. d) The Applicant notes that from normal operation, the drainage lagoon will not be polluted or be expected to contain contaminants. The Applicant has updated the outline Decommissioning Environmental Management Plan [as updated alongside this submission] to confirm that the drainage lagoon will be removed at decommissioning, and the ground remediated if necessary.

2.2 Response to Cambridgeshire County Council

Table 2: Response to Cambridgeshire County Council Comments on Deadline 2 Submissions (REP3-076)

Our Ref.	Ref.	CCC Comments	Applicant Response
Applicant Response to Local Impact Reports [REP2-043]			
CCC-D3-01	2.3.2, 2.3.42, 2.3.44, 2.3.45, 2.3.46	The Council welcomes the applicant's confirmation that woodland / hedgerows and trees will be retained at decommissioning, as well as confirming other elements (grassland / pasture) would remain on site at decommissioning but their future retention would be at the discretion of the landowners, within the outline Landscape and Ecological Management Plan (oLEMP) [REP1-040]. The Council is still of the opinion that the proposed development should consider how habitat retention and monitoring can be secured beyond decommissioning. We consider to identify potential opportunities to retain and manage they habitats beyond decommissioning and support the landowner will be an important role for the steering group (overseeing the implementation of the oLEMP). It is therefore recommended the oLEMP is updated to ensure that the landowner is actively engaged in the steering group process towards the end of the lifetime of the scheme.	The Applicant has updated the oLEMP [as updated alongside this submission] as requested by CCC to engage the landowners through the steering group prior to decommissioning of the Scheme.
CCC-D3-02	2.3.10	The Council seeks the Illustrative Environmental Masterplan [APP-121] be updated to remove this drafting error. Although it is an illustrative masterplan, it must be accurate and avoid any errors being carried forward into production of detailed landscape drawings etc. The orange circle on drawing below indicates location of where some of the triangle of existing woodland is being	The Applicant is not proposing removal of any of the woodland habitat identified within the orange circle indicated by CCC. The existing vegetation shown is derived from the BlueSky National Tree Map which shows canopy extent, hence the gap in the vegetation which aligns with aerial imagery visible from other sources. The plan is illustrative only with the host authorities

Our Ref.	Ref.	CCC Comments	Applicant Response
		lost to another habitat (although it is unclear what this habitat will be) on Sheet 10 of Illustrative Environmental Masterplan [APP-121] 	having approval of the final landscape proposals through Requirements 3 and 4 of the draft DCO [REP3-009]. The Applicant has amended Figure 4 in Appendix A of the oLEMP [as updated alongside this submission] to update the graphics in this location.
CCC-D3-03	2.3.13	The Council does not agree with the applicant's approach for surveying trees for bats. The implementation of a sensitive lighting scheme is not considered adequate measures to avoid more survey work because at this stage, the location and light spill from these luminaires during construction is unknown, and some bat species are very light sensitive and require dark corridors (i.e. sensitive lighting will be ineffective, instead, no lighting is required). We would expect trees to have been surveyed, unless it can be demonstrated that dark corridors of sufficient size (e.g. 10m suggested by Natural England) adjacent to trees with roosting potential and connections to foraging / commuting routes. Spring is the start of the active bat survey period and therefore, provided a good opportunity to complete the necessary survey work during the progression of the Examination.	The Applicant notes that Natural England expressed in their response to the ExA First Written Questions [REP3-083] that they '<i>do not disagree with the conclusions on [sic] their environmental statement</i>'. Nonetheless, additional measures have been discussed with CCC and included in the outline Construction Environmental Management Plan (oCEMP) [as updated alongside this submission], including: • Commitment to providing light spill plans and agreeing a lighting strategy with the host authorities • Pre-construction survey of trees • Ecological Clerk of Works (EcoCoW) to assess boundary trees and advise on appropriate mitigations or further survey

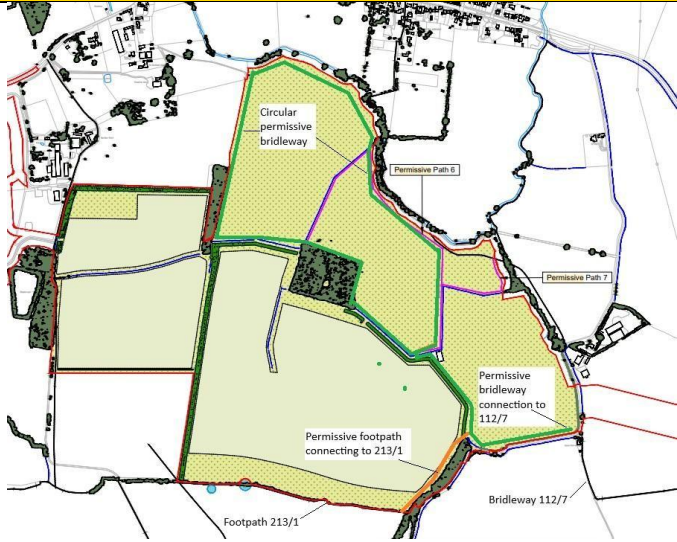
Our Ref.	Ref.	CCC Comments	Applicant Response
			Prior notification to Natural England under the 'incidental result' defence in accordance with Section 10(3)(c) of the Wildlife and Countryside Act.
CCC-D3-04	2.3.14	The Council refers the applicant to the following paragraph 4.1.2 of the outline Construction Environment Management Plan [REP2-029] which states that "construction workers would typically arrive in the hour prior to the start of construction and leave in the hour after construction work ceases. Construction staff would therefore arrive at the Site before 08:00 and depart after 18:00 during weekdays." We therefore assume lighting will also be turned on during this period (e.g. 7am to 7pm). Please can the applicant confirm if this is the case.	The Applicant agrees that low-level lighting at the construction compounds could be necessary during winter months in this period. Construction activities would not be permitted to commence until after 08:00, and so there would be no requirement for lighting away from the compounds before this time.
CCC-D3-05	2.3.18	The Council is still concerned that sub-optimal surveys were completed of the watercourses that will be impacted by the scheme. Insufficient survey work / evidence has been provided to confirm whether water vole is present or absent. Therefore our position is the same – further survey work is required to determine the impact of the scheme on water vole. This should include two surveys completed at an appropriate time of year, using appropriate methods (e.g. suitable for dense vegetation). The Council accepts that further water vole survey work is not required for the watercourses to be 'enhanced' as part of the scheme, where it has been confirmed that no in-channel enhancements or ground works to the riparian corridor will occur (works are limited to grassland management of banks).	The Applicant welcomes that additional survey is not required for 'enhanced' watercourses, where no in channel works would occur. The Water Vole Mitigation Guidelines state that where water vole presence is not confirmed during the first visit a second visit may not be required under the following circumstances: - Habitat is of low suitability for water vole and there is a low likelihood of presence up to 2km from the areas of works; or, - Where the assessment of effects can be made on a precautionary basis In all cases, the guidelines recommend a second visit prior to commencing works. The only field sign able to confirm presence of water vole is latrines, which were not identified within the field surveys,

Our Ref.	Ref.	CCC Comments	Applicant Response
			however other field signs, such as burrows and feeding remains are suggestive of presence. The only potential water vole evidence was observed at C54 as shown on ES Vol 3 Figure 2-3 Indicative Crossings Plan [APP-123], although only a single potential feeding remain was observed in association with burrows of a suitable dimensions. In line with the water vole mitigation handbook, this is suggestive of a low density of water vole at this location, if present. Other watercourses offering potentially suitable habitat are at C01, C05a, C05b, C35, C58a and C58b as shown on ES Vol 3 Figure 2-3 Indicative Crossings Plan [APP-123]. Each of these potentially suitable ditches are distanced from each other and lack connectivity. This is supported by desk study information, which showed no records of water vole within 1km of the Site, and with records clustered in three locations (River Kym 1.1km north of Site C, Ditch 1.65km south-west of Eaton Socon Substation and Hen Brook 1.8km east of the Site). Given the limited suitable habitat present and low density of desk and field study records it can therefore confidently be predicted that water vole if present are sparsely distributed within the area, at low density. In accordance with the guidance set out above, a second survey would be undertaken prior to works as set out in the outline Construction Environmental Management Plan (oCEMP) [REP3-048].
CCC-D3-06	2.3.19 & 2.3.36	The applicant refers to a literature review by BSG Ecology – a citation should be provided, to allow the Council to review this research.	Taylor, R., Conway, J., Gabb, O. & Gillespie, J. (2019) <i>Potential ecological impacts of ground-mounted photovoltaic solar panels</i> .

Our Ref.	Ref.	CCC Comments	Applicant Response
			<i>Accessible at: https://www.bsg-ecology.com/wp-content/uploads/2019/04/Solar-Panels-and-Wildlife-Review-2019.pdf</i>
CCC-D3-07	3.2.20 & 3.2.37	The Council welcomes the applicant's offer to further discuss opportunities for arable flora within the landscape masterplan – prior to Deadline 3.	The Applicant notes this comment and has now consulted with CCC on the location for arable flora opportunities within the Scheme. This is reflected in the updated Appendix A of the oLEMP [as updated alongside this submission]. The Applicant has also updated the oLEMP to set out the establishment and management of the arable flora areas.
CCC-D3-08	3.2.22, 3.2.30, 3.2.34 & 3.2.35	We refer the applicant to the Council's Comments on any updated or additional documents from the applicant [REP2-049] with regards to the Outline Landscape and Ecological Management Plan [REP1-041] and farmland bird mitigation.	The Applicant notes this response.
ES Vol 2 Technical Appendices: Appendix 6-9: Site D Trial Trench Evaluation Final Report [REP2-018]			
CCC-D3-09	General	A new ECB number should be obtained from the Council's Historic Environment Record for Site D. This report uses the one issued for Site C.	The Applicant has obtained a new ECB number from the Council's Historic Environment Record for Site D. ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has been amended for Deadline 4.
CCC-D3-10	1.7	This is inaccurate for a DCO – the Local Planning Archaeology will not alone determine the mitigation strategy. Requirement 11 states the archaeological mitigation strategy is to be agreed with the local planning authority in consultation with the county archaeologist and Historic England. Please could the applicant amend to show the correct procedure.	The Applicant notes this comment and acknowledges that the final archaeological mitigation strategy is to be agreed with the local planning authority in consultation with the county archaeologist and Historic England. ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has been amended for Deadline 4.

Our Ref.	Ref.	CCC Comments	Applicant Response
CCC-D3-11	3.1	The wording should be changed to Area D, not Area B.	ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has been amended for Deadline 4.
CCC-D3-12	6.64	The results for Trench 935 need further consideration of why the geophysical anomalies did not show up, especially as a feature was found in section.	ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has been amended for Deadline 4.
CCC-D3-13	11.1	This did not take place – the Council would like to request for this to be removed.	Section 11.1 of ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has been amended for Deadline 4.
CCC-D3-14	Figures	None of the detailed trench plans contain feature or cut numbers – please can the applicant review and amend this document as features can only be located on a detailed read of trench descriptions.	The Applicant notes that the detailed trench plans (Figure 4.1 onwards) within ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [REP2-018] are illustrated with cut numbers.
CCC-D3-15	Appendix C	An original OASIS form should be added to the report. The Council's Historic Environment Team are happy to answer any direct queries about this.	ES Vol 2 Appendix 6-9: Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has been amended for Deadline 4.
Outline Landscape and Ecological Management Plan [REP2-033]			
CCC-D3-16	5.3.44 and Appendix 1	CCC understands that the final routes of proposed permissive paths are yet to be determined. However to be satisfied that the routes offer sufficient mitigation, it is important for CCC to understand the true extent of permissive access that is being offered. Furthermore, permissive paths should be accessible to and inclusive of as wide a range of users as possible, providing enhanced connectivity for the adjoining network of PROW. It is noted that permissive footpaths are proposed within Area C (permissive paths 6 and 7). These paths fail to maximise	The Applicant has engaged with Historic England in relation to the positioning of the permissive access in this area, and for reasons of site security both to the Scheme and the archaeology is not seeking to extend the permissive access to the highway to the south – instead preferring a single public access to the scheduled area from the direction of Great Staughton to the north. The Applicant has further engaged with landowners at Site C and is not in a position to agree further permissive access within

Our Ref.	Ref.	CCC Comments	Applicant Response
		the access opportunities offered by the land set aside for environmental mitigation and could provide both (i) a more extensive and well-connected leisure opportunity by extending further across Area C, and (ii) a more inclusive offer by providing access for equestrian users approaching the site from the nearby Bridleway 112/7. The land also offers an opportunity to provide an off-road connection between Bridleway 112/7 and Footpath 213/1. A sketch of these potential enhancements is included in the next row below. Additionally, it is not entirely clear from the Appendix plan whether permissive path 6 will connect at its northern point to the existing footpath 213/3. Clarity is sought on this point, as this is the closest and most convenient access point to the permissive paths from Staughton. Proposed permissive bridleways shown in green. Proposed permissive footpaths shown orange. Applicant's proposed paths to remain (where not coinciding with CCC's proposals).	the Site C area. The Applicant's position, as set out previously, is that whilst this additional permissive access would be a potential further enhancement, it is not essential mitigation required to make the Scheme acceptable. The mitigation for public rights of way users is set out in the outline Public Rights of Way Management Plan [REP3-058].

Our Ref.	Ref.	CCC Comments	Applicant Response
			
CCC-D3-17	5.3.45	This is unacceptable. The threat that a permissive path may be removed presents the risk that mitigation for the development could also be removed. CCC requests measures are in place to prevent and proactively manage any instances of antisocial behaviour, rather than simply closing the only public access mitigation that is being offered within the County.	The Applicant updated paragraph 5.3.45 of the oLEMP [REP3-056] at Deadline 3 to provide additional detail on the procedure for managing issues of anti-social behaviour on the permissive paths provided with the Scheme.
CCC-D3-18	6.3.11	Public Rights of Way must not be obstructed at any time, unless the appropriate permissions have been provided by the Local Highway Authority and suitable temporary diversions have been provided	The Applicant considers this to be a misunderstanding. The reference to obstruction in this paragraph is only in relation to any maintenance works crossing the PRow corridors (such as grass cutting, hedge cutting, or other PRow surfacing work) and not an obstruction that would necessitate a closure of the PRow. The Applicant is aware that any PRow closure through the

Our Ref.	Ref.	CCC Comments	Applicant Response
			operational phase must be carried out in accordance with Article 15 of the draft DCO [REP3-009] and would require approval from the LHA prior to commencing. The Applicant has amended paragraph 6.3.11 of the oLEMP [as updated alongside this submission] to remove this uncertainty.
Natural England Letter of No Impediment: Great Crested Newts [REP2-047]			
CCC-D3-19	Paragraph 6, Page 6	The Council is concerned that Natural England has raised the issue of lack of post-development great crested newt population monitoring and considers “the absence of monitoring proposals limits the ability to verify the effectiveness of the mitigation and compensation measures”. Therefore, the Council seeks the Outline Landscape and Ecological Management Plan [REP2-032] is updated to include monitoring scheme for great crested newt.	The requirement for monitoring will be included in any final licence application submitted post-consent. Table 4 of the oLEMP [REP3-056] includes for great crested newt presence/absence (eDNA) survey of on-site ponds in Years 1,3,5 and every 5 years thereafter.

Table 3: Response to Cambridgeshire County Council Response to ExQ1 (REP3-077)

Our Ref.	Ref.	CCC Comments	Applicant Response
CCC-D3-20	Q1.3.2	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. Rarely are PPAs extended for the life of a scheme post-consent, in this case 40-years. By contrast, a Section 106 agreement is a statutory planning obligation that is legally enforceable and capable of binding the land and future owners. In BBC's Local Impact Report [REP1-071] Matter 37, 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 as set out in section 4.2 of the	The Applicant has provided a response on this matter with reference to BBC-D3-01 in Table 1.

Our Ref.	Ref.	CCC Comments	Applicant Response
		oLEMP. The other Host Authorities set out a similar position in their Local Impact Report. (Cambridgeshire County Council's Local Impact Report [REP1 075], paragraph 2.3.41). An alternative approach could be to include an agreed monitoring contribution within the Terms of Reference of the oLEMP and to introduce Page 3 of 10 a new article within the draft DCO to secure the allocation of funding to CCC and the other Host Authorities for the steering group. The host authorities will engage in discussions with the Applicant and the other Host Authorities to explore this approach if the Applicant is not willing to pursue a Section 106 agreement. 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 the proposed oLEMP Steering Group). While the Host Authorities are supportive of this group, 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. The Host Authorities note that a similar matter has been raised through their separate representations regarding the request for other monitoring fees (for example a Travel Plan and PRoW) along the same justification. We remain open to discussion with the Applicant to explore approaches should the Applicant not be willing to pursue	

Our Ref.	Ref.	CCC Comments	Applicant Response
		a Section 106 agreement on the basis that such an agreement addresses the concerns raised above.	
CCC-D3-21	Q1.3.8	The Biodiversity Net Gain Report has been superseded by version P02 [REP1-053]. The Council remains concerned that the BNG report is incomplete, please see comments relating to Biodiversity Net Gain Report [REP1-053] in the other submission at Deadline 3, responding to the Applicant's submissions at Deadline 2.	The Applicant is not aware of any comments made specific to concerns on BNG in CCC's other Deadline 3 submission [REP3-076] . The Applicant has provided a response to matters raised in that submission that relate to other biodiversity matters, with the responses in Table 2, above.
CCC-D3-22	Q1.3.9	The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire would be the most appropriate local organisation to include in the membership, given their experience of managing sites for nature (including farmland birds in Cambridgeshire). However, they would require payment to cover their time / input. Given the potential impact to farmland birds, It would be useful to ask RSPB to be on the steering group to help advice on monitoring of farmland birds, but again, they would require resources to undertake a role.	As outlined within the oLEMP [REP3-056] , representatives from the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire would be invited to join the steering group, however the Applicant cannot mandate their inclusion. The Applicant has not received any submissions from the RSPB in relation to this Scheme. The Applicant has updated Section 4.2 of the oLEMP [as updated alongside this submission] to confirm that any reasonable expenses incurred by representatives of the East Park Landscape and Ecological Management Plan Steering Group will be reimbursed.
CCC-D3-23	Q1.3.10	We would support management and monitoring of all ecological features throughout the lifetime of the project, to ensure that all ecological mitigation and enhancements set out in the oLEMP [REP1-040] continue to be monitored throughout the lifetime of the project. Particularly regarding farmland birds. It terms of delivering Biodiversity Net Gain (and in line with the statutory metric), It should be noted that 30 years is the minimum monitoring period but should only finish when all post-development habitats meet their BNG	The oLEMP [REP3-056] includes monitoring of ecological features at Table 4, including breeding birds. All monitoring would be undertaken with reference to Solar Energy UK 'A standardised Approach to Ecological Monitoring' guidance. Where habitats are not meeting their targets monitoring reports would be submitted to the host authorities. This would include remedial measures and monitoring, which may include additional years of management. However, the oLEMP includes habitat management for the lifetime of the Scheme which is 40 years, and so exceeds the 30 years required under BNG requirements.

Our Ref.	Ref.	CCC Comments	Applicant Response
		habitat type and condition as set out in the statutory metric (e.g. exceed 30 years).	
CCC-D3-24	Q1.3.13	The Council has raised a number of concerns at paragraphs 2.3.8 – 2.3.20 within the Local Impact Report [REP1-075] regarding the coverage of ecological surveys for protected species (bats, great crested newts, water vole and arable flora) within the ES. Concerns were also raised at paragraph 2.3.25 about the accuracy of the BNG assessment, given incomplete habitat surveys. 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 and adequacy of mitigation / compensation measures. The Applicant has responded to these points and provided further clarification within the 'Applicant Response to Local Impact Reports P01' [REP2-043]. The Council is satisfied that further survey work for great crested newt is not required. It is considered that further survey work is still required for bats and water vole. The applicant has also committed to discussion management for arable flora with the Council – the requirement for further survey work will depend on the outcomes of these discussions. The council 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.	The Applicant notes this response. The Applicant has provided responses in relation to bats as CCC-D3-03, water vole as CCC-D3-04 and arable flora as CCC-D3-06 in Table 2, above.
CCC-D3-25	Q1.3.15	The Council welcomes the request for a Habitats of Principal Importance Plan, which will help to address	The Applicant updated the Statutory and Non Statutory Sites or Features for Nature Conservation Plan [REP3-008] to

Our Ref.	Ref.	CCC Comments	Applicant Response
		some of the Council's previous concerns / comments. We also suggest that a plan showing irreplaceable habitats (e.g. ancient / veteran trees) is produced.	include Habitats of Principal Importance as surveyed within the Order limits. Potential ancient or veteran trees are recognised in ES Vol 2 Appendix 2-2 Arboricultural Impact Assessment [APP-056] with locations shown on the accompanying tree constraints plan. The Applicant does not consider repeating these on another plan to be necessary, given the Arboricultural Impact Assessment is specifically referenced within the other management plans.
CCC-D3-26	Q1.3.16	The Council considers that impacts to ground nesting birds will be long-term due to the removal of nesting habitat, with reinstatement of habitat not possible until decommissioning.	The Applicant notes this response and concurs that displacement of ground nesting birds would persist for the lifetime of the Scheme. The displacement of ground nesting bird species has been described as permanent within the Ecology Chapter of the ES [APP-043] .
CCC-D3-27	Q1.5.4	Cambridgeshire County Council considers more detail is needed as to how, as the highway authority, it approves, inspects and signs off works on the public highway. The suggestion is this is through protective provisions for both local highway authorities. This will specify timescales and would negate the need for to be included as part of article 14. Cambridgeshire County Council makes reference to Cambridge Waste Water Treatment Plant Relocation DCO as an example. In that 40 working days is specified as the duration of time to approve submissions of details which the council considers as sufficient.	The Applicant's position remains that the extent of the highway works required in relation to the Cambridge Waste Water Treatment Plant Relocation Order 2025, were much larger than what is proposed in relation to the Scheme, therefore, to replicate the protective provisions included in this order would result in a disproportionate solution. The Applicant and CCC maintain active discussions with the aim to agree a side agreement as an alternative to protective provisions which will provide both parties with the necessary assurances in a proportionate framework in relation to the highway works proposed as part of the Scheme.
CCC-D3-28	Q1.5.10	The hedgerows will not form part of the adopted highway maintainable at public expense, however the removal may	The Applicant notes this comment.

Our Ref.	Ref.	CCC Comments	Applicant Response
		be required on the grounds of highway safety for the provision of appropriate vehicle to vehicle splays. Any trees that are affected with regard to possible pollarding will need to be assessed with regards to their significance by the tree officer. Any tree removal required should be replaced with two trees in compensation in line with adopted policy.	
CCC-D3-29	Q1.11.3	Cambridgeshire County Council has noted the inclusion of a 'Shuttle Bus' service to bring workers in from locations in the area and the applicant has agreed this in the Travel Plan. It is expected further detailed proposals will be submitted as part of a future submission. It would be very difficult to enforce employees to travel by non-car modes and utilise the shuttle bus, although the number of vehicles and their occupancy can be monitored by ANPR/CCTV cameras at site entrances/exits	The Applicant notes this comment. Exact details of the proposed pick-up / drop-off locations for the staff minibus service will be set out within the final Construction Worker Travel Plan, once the origin points for construction staff are confirmed. It is proposed that staff would be encouraged to use the shuttle bus service through the use of a car park permit system to limit the number of vehicles permitted to park on-Site, as set out in Section 5.2 of the outline Construction Worker Travel Plan (which forms Appendix 1 of the outline Construction Traffic Management Plan [REP3-050]).
CCC-D3-30	Q1.11.4	The applicant has been advised to look at a Geofencing option to ensure HGV's comply with designated times.	The Applicant is committed to implementing the most suitable type of monitoring system (ANPR or GPS-based geofencing), and that the specific monitoring system that will be implemented will be set out within the final CTMP depending on which system is found to be the most suitable for use at this Site.

2.3 Response to Huntingdonshire District Council

Table 4: Response to Huntingdonshire District Council Response to ExQ1 (REP3-079)

Our Ref.	Ref.	HDC Comments	Applicant Response
HDC-D3-01	Q.1.3.2	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. Rarely are PPAs extended for the life of a scheme post-consent, in this case 40-years. By contrast, a Section 106 agreement is a statutory planning obligation that is legally enforceable and capable of binding the land and future owners. In BBC's Local Impact Report [REP1-071] Matter 37, it was suggested that a fee for the monitoring of BNG, ecology and landscape mitigation works could be secured	The Applicant has provided a response on this matter with reference to BBC-D3-01 in Table 1.

Our Ref.	Ref.	HDC Comments	Applicant Response
		through a Section 106 agreement or the proposed Landscape and Ecological Management Plan (oLEMP) Steering Group mechanism as set out in section 4.2 of the oLEMP. The other Host Authorities set out a similar position in their Local Impact Report. (Cambridgeshire County Council's Local Impact Report [REP1 075], paragraph 2.3.41). An alternative approach could be to include an agreed monitoring contribution within the Terms of Reference of the oLEMP and to introduce Page 3 of 10 a new article within the draft DCO to secure the allocation of funding to CCC and the other Host Authorities for the steering group. The host authorities will engage in discussions with the Applicant and the other Host Authorities to explore this approach if the Applicant is not willing to pursue a Section 106 agreement. 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 the proposed oLEMP Steering Group). While the Host Authorities are supportive of this group, 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. The Host Authorities note that a similar matter has been raised through their separate representations regarding the request for other monitoring fees (for example a Travel Plan and PRoW) along the same justification. We remain	

Our Ref.	Ref.	HDC Comments	Applicant Response
		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.	
HDC-D3-02	Q1.3.13	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 6.85-91 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 extend to which they may influence the robustness of the assessment conclusions. 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.	The Applicant notes this response.

3.0 RESPONSE TO STATUTORY ENVIRONMENTAL BODIES

3.1 Response to Natural England

Table 5: Response to Natural England Response to ExQ1 (REP3-080)

Our Ref.	Ref.	NE Comments	Applicant Response
NE-D3-01	Q.1.3.12	Natural England has had no further discussions with the applicant surrounding potential bat mitigation. While Natural England would encourage a more precautionary buffer zone, extending the existing from 6m to 10m, we do not disagree with the conclusions on their environmental statement.	The Applicant notes this comment, and that Natural England do not disagree with the conclusions of the Environmental Statement.

3.2 Response to Historic England

Table 6: Response to Historic England Comments on Deadline 2 Submissions (REP3-080)

Our Ref.	HE Comments	Applicant Response
ES Vol 2 Appendix 6-6 Site A Trial Trench Evaluation Final Report P03 [REP02-015]; ES Vol 2 Appendix 6-7 Site B Trial Trench Evaluation Final Report P02 [REP02-016]; ES Vol 2 Appendix 6-8 Site C Trial Trench Evaluation Final Report P02 [REP02-017]; ES Vol 2 Appendix 6-9 Site D Trial Trench Evaluation Final Report P02 [REP02-018]		
HE-D3-01	We note that the amended documents incorporate the changes Historic England previously requested in the written representations. We are pleased to see that the specialist reports have been included in the report (Appendix B). This information will help them develop strategies for the next archaeological mitigation. It was also good to see that recommendations have been made for further work and where material should be retained in Appendix B. It was noted that some significant metal artefacts were recovered from Site D, including a Roman Colchester type brooch. It would be useful to consider the conservation and analysis needs of the metal objects. We consider that the amended reports outlining the results of the archaeological evaluation are adequate for the purpose of this examination.	The Applicant notes and welcomes this comment. Para 8.1.3 of the outline Archaeological Mitigation Strategy [as updated alongside this submission] has been updated to include a commitment on finds assessment and recommendations for further works, including conservation techniques, within the reporting. Appendix B of ES Vol 2 Appendix 6-9 Site D Trial Trench Evaluation Final Report [as updated alongside this submission] has also been updated to include a conservation recommendations table. These amendments have been discussed with Historic England and are reflected in the updated Statement of Common Ground with Historic England [as updated alongside this submission].
Outline Construction Environmental Management Plan (Clean) P03 [REP02-028]		
HE-D3-02	Historic England welcomes changes to the mitigation and management measures in respect of the decommissioning works affecting the scheduled monument as outlined in Table 5.1. We specifically note inclusion of the commitment to backfill the buried conduit with a suitable non-contaminative inert material and the clarification of timeframes for the removal of the temporary access	The Applicant acknowledges the need to consult Historic England prior to undertaking the proposed backfilling. Requirement 15 of the draft DCO [REP3-009] states that no phase (which includes decommissioning) within the authorised development can commence until an Archaeological Mitigation Strategy for that phase has been approved by the local planning

Our Ref.	HE Comments	Applicant Response
	track. We consider that the amendments address our previous comments in respect to these points. However as final details of the proposed method of backfilling are not available at this point, we would need to be consulted, and final details will need to be agreed before this action is implemented. Historic England will continue to engage with the applicant over the issues related to long-term management of the scheduled monument beyond lifespan of the Project.	authority in consultation with the county archaeologist and Historic England. The Applicant must therefore consult with Historic England before undertaking any decommissioning works.
Outline Archaeological Mitigation Strategy (Clean) P03 [REP02-034]		
HE-D3-03	We note inclusion of the commitment to backfill the buried conduit with a suitable non-contaminative inert material in paragraph 7.5.6. Historic England supports this commitment, however as final details of the proposed method of backfilling are not available at this point, we would need to be consulted, and final details will need to be agreed within us before this action is implemented.	The Applicant acknowledges the need to consult Historic England prior to undertaking the proposed backfilling. Requirement 15 of the draft DCO [REP3-009] states that no phase (which includes decommissioning) can commence until an Archaeological Mitigation Strategy for that phase has been approved by the local planning authority in consultation with the county archaeologist and Historic England. The Applicant must therefore consult with Historic England before undertaking any decommissioning works.
HE-D3-04	We note that the document referenced as Historic England 2015c (in paragraph 6.3.37), in relation to sampling, is not included in the bibliography at the end of the document. We recommend that it is clarified which document is referenced. We would also recommend that the Historic England document 'Environmental Archaeology' (2025) is referred to when developing sampling strategies.	The outline Archaeological Mitigation Strategy [as updated alongside this submission] has been updated to address this comment. This amendment has been discussed with Historic England and is reflected in the updated Statement of Common Ground with Historic England [as updated alongside this submission].

4.0 RESPONSE TO STATUTORY UNDERTAKERS

4.1 Response to National Grid Electricity Transmission

Table 7: Response to National Grid Electricity Transmission Response to ExQ1 (REP3-082)

Our Ref.	Ref.	NGET Comments	Applicant Response
NGET-D3-01	Q1.1.21	At this stage, National Grid Electricity Transmission (NGET) is not able to provide definitive projected timelines for determining the scope of works at East Socon Substation, nor for the delivery of any expansion, rebuild, or new substation. This is because the project remains at an early stage and is subject to a number of dependencies, including: • The outcome and implementation of NESO's Connection Reform process, which will influence the need, scale, and timing of network reinforcement works; • Ongoing commercial discussions with the Applicant; • Completion of detailed technical studies, including network design and site feasibility assessments; and • Subsequent planning, environmental assessment, and consenting processes. NGET remains committed to ongoing engagement with the Applicant and other stakeholders and will refine and communicate programme information as greater certainty is achieved through the Connection Reform process and project development.	The Applicant acknowledges these comments and would welcome continued engagement and projected timelines and programme information from National Grid once these are available. The Applicant has responded to Q1.1.21 in Applicant Response to ExA First Written Questions [REP3-072]. The Applicant maintains the position set out in that response, namely that, in relation to the assessment of cumulative impacts or any overlap between the construction of the proposed development and the Eaton Socon Substation upgrade works, there is currently insufficient information available in respect of the upgrade works to undertake any meaningful cumulative assessment within the remit of this application. The Applicant will continue to engage and collaborate with NGET as the projects progress.

Our Ref.	Ref.	NGET Comments	Applicant Response
		With respect to cumulative impacts, consideration of these effects in relation to any proposed East Socon Substation project falls within the scope of the Applicant's assessment and application documentation.	

4.2 Response to National Gas Transmission

- 4.2.1 The Applicant has provided a separate Deadline 4 submission responding to National Gas Transmission: **Applicant response to Deadline 3 submission made by National Gas Transmission [EN010141/DR/8.60]**.

