



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

Planning Inspectorate
Submitted via PINs Portal
East Park Energy Project Web Page (PINs)

Email: planning@bedford.gov.uk
Date: 21 July 2026
Ref. EPE 23-02405LPA/2.12D5

RESPONSE TO DEADLINE 5: Cover Statement

Dear Sir,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141).

BBC Reference No.: 25/01836/DCO | Examination Ref. FB8D70A75

LOCATION: Land at and Between Keysoe Pertenhall and Little Staughton, Staughton Road, Little Staughton, Bedfordshire (the 'Site').

PARTICULARS OF DEVELOPMENT: The Proposed Development 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 Proposed Development also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

This response is solely that of Bedford Borough Council, submitted without prejudice.

Case Officers:

Should you require any clarification, please contact [REDACTED] (Lead Case Officer) or [REDACTED] (Principal Planning Officer) [REDACTED]@bedford.gov.uk [REDACTED]@bedford.gov.uk (Planning@bedford.gov.uk).

DELEGATED AUTHORITY

This response has been reviewed and approved under the Council's Planning Committee Scheme of Delegation to Officers (adopted 2022):

Signature: [REDACTED]

Date: 21 July 2026

[REDACTED]: Head of Planning and Building Control

[REDACTED] Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

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1.0 INTRODUCTION

Context Cover Statement

- 1.1 This statement is prepared by Bedford Borough Council (the ‘Council’) in response to Deadline 5 (21 July 2026).
- 1.2 It is noted that the Council remains in discussion with the other Host Authorities and the Applicant in addressing and concluding matters, and where possible, to attain resolution.
- 1.3 This Report 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).

2.0 DCO Agreement

- 2.1 The Council notes that various discussions have been had between the Host Authorities and the Applicant in respect to comments raised and reverted between Parties with regards to the [REP3-009] Draft DCO Agreement (and related [REP3-011] Explanatory Memorandum) and versions thereof.
- 2.2 Engagement has continued since that submission, including a number of meetings with the Applicant and the exchange of comments and suggested amendments.
- 2.3 This work remains ongoing as reflected in the second draft Statement of Common Ground (SoCG) as prepared by the Applicant and submitted by the Applicant at **Deadline 5**.

3.0 Statement of Common Ground (Second Draft)

- 3.1 The Council has reviewed all submissions and reverts made by the Host Authorities and the Applicant to date and have updated their Environmental Statement tracker accordingly. The tracker reflects that considerable progress has been made with the Applicant in resolving the Matters as set out in the Council’s [REP1-069] Written Representation and [REP1-071] Local Impact Report (LIR) (Deadline 14 April). The tracker has been RAG rated in line with the convention used in the Statement of Common Ground as – (green) been agreed; (amber) under discussion; and, (red) not agreed. To aid the Examination, the tracker also indicates those Aspects, Matters and/or Issues that have been concluded.
- 3.2 The tracker is submitted as a PDF as part of Deadline 5 under separate cover (an Excel copy can be made available if requested).
- 3.3 On this basis, the Council has reviewed the [REP2-036] Statement of Common Ground (SoCG) prepared in discussion with the Council and submitted by the Applicant in April 2026; and, in consultation with the other Host Authorities and discussion with the Applicant, has updated the SoCG (Second Draft) to reflect the current position between Parties, which will be submitted by the Applicant at **Deadline 5**.
- 3.4 The Council notes that there remain the following points of disagreement; namely:
 - a) (LIR) Matters 45 and 96 and LIR para 19.4 (Underground cabling): the Council is **NOT SUPPORTIVE** of the Applicant’s approach to leave remaining in-situ the underground cables’ plastic sleeving post-decommissioning of the Scheme. This generates long-term environmental harm, say by way of the degrading of micro-plastics, which may leach and translocate into the soil and eventually the surrounding water courses causing contamination. From an environmental point of view, this is not acceptable.

- b) (LIR) Matter 13 (All Saints Church) (ES Chp. 6 Cultural Heritage): the Council maintains a matter of disagreement with the Applicant in relationship to the likely effect on Asset 38, the Grade I listed 'All Saints Church' in Little Staughton which is viewed as differing professional opinion; this is deferred to the ExA for assessment and determination.
- c) (LIR) Matters 57, 59 and 60 and RR112 (PRoW Vehicle access): the Council continues to note that it is **NOT SUPPORTIVE** of the Applicant's proposal to use the PRoW for Scheme vehicle activity within any phase.

4.0 Matters arising: Management Plans

- 4.1 The Council has reviewed [REP3-056] oLEMP Appendix C Outline Farmland Bird Mitigation Strategy at both the principle and at the detailed level – this review is submitted as **Appendix A**.

5.0 Matters arising: Land and property rights and powers

- 5.1 [REP1-071] Local Impact Report Matter 56: in response to the matter of land and property rights and powers as requested by the Applicant, the Council has review the Land and Crown Land Plan [APP-008]; the Street Works, Rights of Way and Access Plan [APP-010]; the Draft DCO Agreement [APP-016]; the Book of Reference [APP-021]; the Land and Rights Negotiation Tracker [APP-022]; and, the outline Public Right of Way Management Plan [APP-159]); the Council has attended the CAH1, and remains in discussion with the Applicant regarding this matter.
- 5.2 In terms of the rights requested, the Council notes that it has as Local Highway Authority a statutory duty of care regarding the management and maintenance of the Public Highways and consequently the Applicant's proposal for the 'acquisition of rights' and/or 'temporary possession and use' is **NOT SUPPORTED**.
- 5.3 It is suggested by the Council as Local Highway Authorities that a Side Agreement, with reference to the requirements of the Highways Act 1980 (as amended), the Road Traffic Regulation Act 1984, and related legislation, is drafted and agreed in-principle between Parties prior to the conclusion of the Examination. A draft Agreement with heads of terms has been shared between Parties. This Matter remains on-going - any outstanding areas of disagreement or unresolved drafting points will be captured in the final SoCG.

6.0 Examining Authority: Deadline 6

- 6.1 The Council notes the request by the Examining Authority for further information, made 16 July – in both cases the matters raised falls outside the remit of the Council and consequently the Council will not be making any submission against this request at Deadline 6 (4 August).

The Council trust that this information is of assistance to the Examining Authority. Should you wish to discuss any matters raised in the submissions made against Deadline 5, then please do not hesitate to contact the Lead Case Officer by email.

PD-QA/4pg end

APPENDIX A: [REP3-056] oLEMP Appendix C Outline Farmland Bird Mitigation Strategy COUNCIL'S REVIEW:

The Council sets out below the review undertaken by AECOM on behalf of the Host Authorities.

1. The Council welcomes the provision of the [REP3-056] Appendix C Outline Farmland Bird Mitigation Strategy (oFBMS) and its securing through inclusion within the oLEMP (itself a control document).
2. Chp. 5: the Council request that a table is included in the oFBMS to summarise the losses and gains.
3. Paragraph 5.2.4: the Council welcomes the commitment to the creation of grassland habitats north of Site C in advance of works commencing on Site A. However, the Council request further detail on when the other areas of mitigation are expected to be provided relative to the overall construction programme. In addition, the Council requests that the oFBMS reflects the need for the habitats to be created and established sufficiently to fulfil their intended bird mitigation purposes in advance of the first season their use is assumed within the mitigation strategy; i.e. the Council requests a programme for the delivery of these works within the Construction Phase.
4. The Council requests clarification on how activity on the Public Rights of Ways (PRoW), Permissive Paths, Access tracks, Heavy duty access tracks, and the potential access and disruption this gives/creates in relation to ground nesting birds and Skylark plots has been considered in the development of the oFBMS; i.e. the Applicant has indicated that c.125ha area has been set aside to form mitigation for ground nesting birds (as illustrated in the oLEMP Appendix C Figs 1a-d), however, these c. 16No. 'Open Grassland suitable for Ground Nesting Birds' areas create numerous 'edges' that may need address/ securing to ensure the adequate protection of ground nesting birds.
(It is suggested that both the Permissive Paths and these areas illustrated in pink makes for difficult reading and clarity).
5. The oFBMS sets out the areas of habitat creation proposed, however it is not currently clear within the strategy what suitability (if any) these habitats have for the species of interest. It is not currently clear if the figures for habitat creation provided amount to areas of additional habitat creation, or if some represent enhancement of areas that are already utilised by these species. The Council requests: (i) A clear summary of the losses and gains in suitable habitat (in ha); (ii) Further information to confirm the existing value of the areas identified for habitat creation for the target species.
6. Section 6: Current monitoring proposals in relation to habitats and bat boxes outlined in Section 6 are welcomed. However, for a scheme with impacts of this scale bird monitoring surveys (replicating those undertaken during the baseline) are considered appropriate. These surveys will be necessary to demonstrate that the mitigation measures set out in the oFBMS are proving effective and objectives set out are being met. The Council requests that these are included within the oFBMS and cross referenced alongside wider species monitoring requirements in the oLEMP. This should also set out measures should the targets not be attained.
7. The Council note that [REP3-056] [REDACTED] *habitat (as shown on Figure 1) suitable for breeding skylark*: it is requested that the Applicant confirm that this would address the more detailed requirements as set out in the RSPB weblink [REDACTED] and/or Natural England's AHW4 Skylark Plots requirement '.