



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: 18 August 2026
Ref. EPE 23-02405LPA/2.13D6

RESPONSE TO DEADLINE 6: Cover Letter

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. [REDACTED]

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](mailto:[REDACTED]@bedford.gov.uk)) ([\[REDACTED\]@bedford.gov.uk](mailto:[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: 18 August 2026

Gavin Chinniah: Head of Planning and Building Control

Craig Austin, Deputy Chief Executive & Director for Environment
Borough Hall, Cauldwell Street, Bedford MK42 9AP

CONTENTS

1.0 INTRODUCTION3

2.0 DCO Agreement.....3

3.0 Management Plans3

4.0 Statement of Common Ground (second draft) [REP5-019] - update5

5.0 Community Benefit Fund.....5

6.0 Examining Authority: Deadline 66

1.0 INTRODUCTION

Context Cover Statement

- 1.1 This statement is prepared by Bedford Borough Council (the 'Council') in response to Deadline 6 (18 August 2026).
- 1.2 It is noted that the Council remains in discussion with the other Host Authorities and the Applicant (the 'Parties') 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 Applicant has submitted an updated draft Development Consent Order (dDCO) [REP5-006] at Deadline 5, incorporating amendments requested by the Host Authorities as part of the legal review undertaken. Whilst some matters remain outstanding, ongoing discussions are continuing to address and agree matters.
- 2.2 The Council notes the Applicant's intention to provide a schedule at Deadline 6 identifying those provisions that remain under discussion or have not yet been agreed.
- 2.3 Highways Side Agreement: the Council notes that Parties are in discussion regarding a Highways Side Agreement that would replace the current Highways Protective Provisions set in the DCO Agreement.
- 2.4 A draft Highway Side Agreement has been circulated between Parties with the intention that this would be concluded prior to the end of the Examination.
- 2.5 The Council intends that any remaining areas of disagreement or unresolved drafting points will be captured in the updated draft Statement of Common Ground (SoCG) to be submitted at **Deadline 7** (1 September).
- 2.6 Dead of Easement: it is noted that in the Council's Covers to Deadlines 3 to 5, that the Local Highway Authorities (LHA) have been in discussion with the Applicant regarding the Applicant's request of securing land and property rights and power through a separate licence outside the DCO Agreement. The Applicant tabled the possibility of a Deed of Easement which was directed at private property rights in the subsoil interests below the highway strata, assumed that the Councils were the freehold owner and held an interest in the land beyond it being adopted highway.
- 2.7 Both Parties remain in discussion to conclude this matter.

3.0 Management Plans

- 3.1 Replacement Phase: the Council can confirm that the Applicant has made amendments to all management plans to incorporate their approach to the Operational – replacement campaign – Phase, as set out in their Technical Note [REP3-075], to address the concern as raised by the Host Authorities.
- 3.2 The Host Authorities have reviewed and considered the Applicant's proposed approach to the replacement phase following ongoing discussions since Deadline 5. The Host

Authorities consider that, as a matter of principle, the DCO should contain a defined replacement phase which is secured with the DCO itself. Whilst this is not yet common practice within precedent DCOs, the Host Authorities view is that this approach should be taken in light of the potential need for significant replacement works across the lifetime of the project and the known likelihood of technological change and advance over the duration of the Scheme. Notwithstanding this in principle position, the Host Authorities have reviewed the amended approach now set out in the updated outline Operational Environmental Management Plan (oOEMP), and other related Management Plans, and are content with the substantive details now contained within the oOEMP including the inclusion of, distinction between, and provision for, a) Routine Replacement Works, b) Planned Partial Replacement Campaign, and c) Major Replacement Campaign Method Statement and Environmental Review. Consequently, without prejudice to the Host Authorities' in-principle position that a "replacement phase" should be embedded within the DCO itself for this Scheme and others in the future, the Host Authorities agree that the Applicant's approach as now amended can be progressed.

3.3 Management Plans: the Council notes the Applicant's intent to provide substantive responses to the Host Authorities' review of the various management plans (first tabled at Deadline 4 [REP4-032]) at Deadline 6.

3.4 On the basis that the Management Plans will be amended as committed to by the Applicant (Applicant's email 03.08.2026); namely:

- a) *'Inclusion of an appendix in each relevant management plan providing a consolidated list of the additional plans and documents that may be prepared pursuant to that plan, together with their purpose and minimum requirements;*
- b) *Alignment of the management plans with the updated approach to replacement works. This includes incorporating a definition of replacement works linked to the oOEMP and reviewing the commitments within each plan to ensure that they adequately address operational, maintenance and replacement activities;*
- c) *Clarification of roles and responsibilities, including the responsibilities of the undertaker, contractors, Environmental Manager and other relevant personnel for implementing, monitoring and reporting compliance with the plans;*
- d) *Improved coordination between the management plans, including clearer cross-references, removal of unnecessary duplication and identification of the plan under which particular controls, approvals or records will be managed;*
- e) *Greater clarity on implementation, review and amendment procedures, including when plans must be reviewed, the circumstances that may trigger an update and the requirement for approval before material amendments are implemented;*
- f) *Review of the use of the terms "temporary" and "permanent" to provide greater clarity where works or measures are specific to a particular phase;*
- g) *Review of the monitoring requirements within each plan to provide greater clarity regarding the actions to be taken in the event of a failure or non-compliance and the mechanisms for enforcement;*
- h) *Strengthening of inspection, incident and record-keeping arrangements, including the recording of inspections, defects, complaints, incidents and near misses, together with corrective actions and the maintenance of an auditable record;*

- i) *Review of the wording of commitments throughout the plans to remove terms such as “would” and “may” and replace them with “will”, where appropriate’;*

the Council would have an **in-principle agreement** on the Management Plans, subject to:

- (i) The amendments being made as suggested by the Applicant above;
- (ii) Review by the Host Authorities of the Management Plans as to be submitted by the Applicant against Deadline 6;
- (iii) Detailed resolution to agree the outline Management Plans prior to Deadline 7; and,
- (iv) Noting that the FINAL Management Plans would be prepared post Examination subject to LPA’s approval,

the Council suggests that substantial resolution can be attained on the various Management Plans prior to the end of the Examination.

- 3.5 The Council intends that any outstanding areas of disagreement will be captured within the final SoCG (deadline 7) to assist the Examining Authority.

4.0 Statement of Common Ground (second draft) [REP5-019] - update

- 4.1 Ref. 46 (Water Framework Directive): following in-house discussions with the Council’s Flood Investigation Officer, the LLFA has responded *‘Looking at what chemicals or pollution could affect watercourses, our view is that the watercourses are only likely to be impacted when watercourse crossings such as culverts, bridges etc. are constructed – and this is likely to be from cement based materials. The only other issue is the downstream holding pond downstream of the BESS if an emergency event occurs with chemical spillage’.*

- 4.2 Both matters raised above are addressed within the [REP3-048] oCEMP para 4.1.22-25.

- 4.3 The Council therefore concludes that all further WFD matters fall within the remit of the Environment Agency, not the Lead Local Flood Authority (LLFA). The Council in so far as its role as LLFA consider the Applicant’s Water Framework Directive Assessment to be adequate, subject to the required mitigation being secured through the draft DCO.

- 4.4 On this basis, this reference within the SoCG will be updated to ‘Matter Agreed’.

- 4.5 Others matters and issues marked as ‘Under discussion’ within the SoCG remain under discussion between Parties with the intent to conclude prior to the end of the Examination.

- 4.6 The Council intends that any outstanding areas of disagreement will be captured within the final SoCG to assist the Examining Authority.

5.0 Community Benefit Fund

- 5.1 As noted in the Council’s Cover to Deadline 4 [REP4-032], the Host Authorities are in very early discussions with Community Energy Pathways (an independent third-party organisation instructed by the Applicant), alongside ward councillors and parish councils regarding the potential scope, governance, and operation of the fund.

- 5.2 While it is noted that the Community Benefit Fund (CBF) is not a planning consideration, it is a voluntary commitment made by the Applicant against this Scheme, it is felt and hence noted by the Council that some reference to the CBF needs to be made by the

Examining Authority in the Examination.

- 5.3 The Council's current position is that in-principle discussions have been undertaken with the clear understanding that the Applicant will engage with the community, local councils, and the Council in framing and attaining an agreement.

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.

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 6, then please do not hesitate to contact the Lead Case Officer by email.

PD-QA/6pg end