

Our Ref: EN010141/DR/8.68

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Application Reference: EN010141

Applicant Cover Letter for Examination Deadline 6

I write on behalf of BSSL Cambsbed 1 Ltd (the 'Applicant') in response to the Examining Authority's (ExA) Rule 8 letter **[PD-006]** dated 01 April 2026 and subsequent Rule 8(3) letter **[PD-011]** on 04 August 2026 in respect of Examination Deadline 6. This letter sets out the submissions made by the Applicant for Deadline 6.

1. The Applicant's revised documents submitted at Deadline 6

The Applicant has provided the following updated application documents as part of this submission:

Document	Rev.	Reason(s) for updates
Application Document Tracker <i>['Clean' and 'Tracked' provided]</i>	P09	Updated to accurately set out the current status of all documents submitted by the Applicant as of Deadline 6.
Street Works, Rights of Way and Access Plan	P03	Minor updates to reflect amendments made to the outline Public Rights of Way Management Plan.
Statutory and Non Statutory Sites or Features for Nature Conservation Plan	P04	Updated in response to comments by Cambridgeshire County Council.

Document	Rev.	Reason(s) for updates
Draft Development Consent Order <i>[‘Clean’ and ‘Tracked’ provided]</i>	P07	Various updates as set out in the Schedule of Changes to the Draft Development Consent Order [EN010141/DR/8.2] .
Explanatory Memorandum <i>[‘Clean’ and ‘Tracked’ provided]</i>	P06	Various updates to reflect Revision P07 of the draft Development Consent Order.
Planning Statement <i>[‘Clean’ and ‘Tracked’ provided]</i>	P02	Updated to remove reference to a secured connection agreement for the BESS.
Policy Compliance Document <i>[‘Clean’ and ‘Tracked’ provided]</i>	P03	Updated to remove reference to a secured connection agreement for the BESS.
ES Table of Contents, Glossary and Acronyms <i>[‘Clean’ and ‘Tracked’ provided]</i>	P02	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
ES Vol 1 Chapter 1: Introduction <i>[‘Clean’ and ‘Tracked’ provided]</i>	P02	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
ES Vol 1 Chapter 2: The Scheme <i>[‘Clean’ and ‘Tracked’ provided]</i>	P04	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
ES Vol 1 Chapter 9: Traffic and Transport <i>[‘Clean’ and ‘Tracked’ provided]</i>	P05	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
ES Vol 1 Chapter 10: Noise and Vibration <i>[‘Clean’ and ‘Tracked’ provided]</i>	P02	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
ES Vol 1 Chapter 11: Air Quality <i>[‘Clean’ and ‘Tracked’ provided]</i>	P02	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
ES Vol 1 Chapter 14: Socio Economics, Development Land and Tourism <i>[‘Clean’ and ‘Tracked’ provided]</i>	P03	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter.
Outline Construction Environmental Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P06	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.

Document	Rev.	Reason(s) for updates
Outline Construction Traffic Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P05	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Operational Environmental Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P05	Updated to incorporate amendments made around the assessment of replacement works, as set out in Section 3 of this letter. Further updated in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Decommissioning Environmental Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P06	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Landscape and Ecological Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P06	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Public Rights of Way Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P04	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Soil Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P04	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Battery Safety Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P03	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Waste Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P03	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Outline Surface Water Management Plan <i>[‘Clean’ and ‘Tracked’ provided]</i>	P04	Various updates in response to comments made by the Host Authorities at Deadlines 4 and 5.
Schedule of Changes to the Draft Development Consent Order <i>[‘Clean’ and ‘Tracked’ provided]</i>	P06	Updated to set out the latest position at Deadline 6.

2. The Applicant’s additional documents submitted at Deadline 6

The Applicant has provided the following additional documents to support the Examination:

Document	Rev.	Reason(s) for submission
Applicant Response to Deadline 4 and 5 Submissions – Host Authorities	P01	To provide the Applicant's responses to matters raised across Deadlines 4 and 5.
Applicant Response to Deadline 4 and 5 Submissions – Other Interested Parties	P01	To provide the Applicant's responses to matters raised across Deadlines 4 and 5.
ES Vol 2 Appendix 2-4: Replacement Works <i>['Clean' and 'Tracked' provided]</i>	P01	The Applicant has updated the previous 'Technical Note on Replacement Works' [REP3-075] and has now submitted this as ES Vol 2 Appendix 2-4: Replacement Works which has been incorporated into the ES. The track change version of ES Vol 2 Appendix 2-4: Replacement Works sets out the changes made from the previous Technical Note on Replacement Works. This is described further under Section 3 of this letter.
Summary of outstanding matters on the draft DCO between the Host Authorities and the Applicant	P01	The Applicant has prepared a schedule setting out the remaining matters under discussion or not agreed between the Applicant and the Host Authorities in relation to the draft DCO.
Applicant's proposed BNG Requirement (submitted without prejudice)	P01	The Applicant is conscious that the Secretary of State may consider it to be necessary to include an express reference to the provision of BNG on the face of the DCO. The Applicant has therefore prepared, on a without prejudice basis, additional wording that can be inserted into Requirement 4 (Landscape and ecological management plan) of Schedule 2 (Requirements) to the draft DCO if the Secretary of State considers it to be necessary.
Technical Note on Skylark Metric	P01	The Applicant has prepared a Technical Note on Skylark Metric, as set out in the Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69].

3. Assessment of Replacements

Following Deadline 4, the Applicant has undertaken a thorough review of the comments received in relation to the **Technical Note on Replacement Works** [REP3-075]. In particular, the Applicant has considered Bedford Borough Council's Review of Technical Note on Replacement Works, contained within its Deadline 4 submission [REP4-032], together with the comments submitted by Stop East Park Energy [REP4-082] and Mr Shaun Woodward [REP4-077]. The Applicant has also engaged with the Host Authorities to ensure

that it fully understood the concerns raised and to identify appropriate amendments to the relevant assessment and control documents.

The Applicant's detailed responses to the matters raised are provided in the **Applicant Response to Deadline 4 and 5 Submissions – Host Authorities [EN010141/DR/8.69]** and the **Applicant Response to Deadline 4 and 5 Submissions – Other Interested Parties [EN010141/DR/8.70]**, submitted alongside this letter.

As a result of that review and engagement, the Applicant has substantially revised the **Technical Note on Replacement Works [REP3-075]** to provide further explanation and assessment of the proposed replacement activities. This includes a sensitivity assessment of a Major Replacement Campaign involving the replacement of 100% of the solar panels within a single campaign. The Applicant remains of the view that the most likely scenario would comprise a series of smaller replacement campaigns involving no more than 20% of the panels in any rolling 12-month period. Nevertheless, the 100% replacement scenario has been assessed to provide a robust and reasonable worst-case assessment. The assessment concludes that the environmental effects associated with such a campaign would remain less than those assessed for the construction phase and would not give rise to significant effects.

The previous and now revised 'Technical Note on Replacement Works' has now been incorporated into the Environmental Statement as **ES Volume 2 Appendix 2-4: Replacement Works [EN010141/DR/6.2]**. The following relevant chapters of the ES have also been updated to reflect the assessment and conclusions presented in Appendix 2-4:

- ES Table of Contents, Glossary and Acronyms;
- ES Volume 1 Chapter 2: The Scheme;
- ES Volume 1 Chapter 9: Traffic and Transport;
- ES Volume 1 Chapter 10: Noise and Vibration;
- ES Volume 1 Chapter 11: Air Quality; and
- ES Volume 1 Chapter 14: Socio-Economics and Tourism.

The Applicant has also revised the **outline Operational Environmental Management Plan (oOEMP) [as updated alongside this submission]** to provide greater detail and certainty regarding the parameters and controls applicable to replacement campaigns

involving no more than 20% of the panels in any rolling 12-month period. These controls address various matters including, but not limited to:

- the maximum scale and phasing of the works;
- the number and deployment of replacement crews;
- phased and sequential working within defined areas;
- access, delivery, collection and internal distribution arrangements; and
- monitoring and record-keeping arrangements that would apply during the works.

The updated oOEMP also reiterates the approval process for any Major Replacement Campaign involving the replacement of more than 20% of the panels in any 12-month period. Before such a campaign could commence, a Major Replacement Campaign Method Statement and Environmental Review would be required to be submitted to and approved by the relevant local planning authority. The oOEMP identifies the information that must be provided within that document, including details of the proposed works and programme, the future environmental baseline, a review of the potential environmental effects, and any additional mitigation or management measures required to demonstrate that the campaign would not result in materially new or materially different environmental effects from those assessed in the Environmental Statement.

The Operational Access Strategy Plan previously contained within the **Technical Note on Replacement Works [REP3-075]** has also been transferred to Appendix B of the **oOEMP [as updated alongside this submission]**. This ensures that the access and traffic arrangements applicable to replacement activities form part of the management framework secured through the draft DCO.

The Applicant has continued to work constructively with the Host Authorities on this matter since Deadline 4. Drafts of the new ES Vol 2 Appendix 2-4, the consequentially updated ES chapters and the revised oOEMP have been shared with the Host Authorities. The Applicant understands that the Host Authorities now have an in-principle agreement that the revised documents provide a sufficient assessment of, and appropriate controls for, any proposed replacement activities to be undertaken as part of the operational phase.

4. Revised Management Plans

Following Deadline 4, the Applicant has been consulting with the Host Authorities with regards the framework of environmental management plans, in particular, the Applicant has considered comments raised by Bedford Borough Council within its Deadline 4 submission **[REP4-032]**.

The Applicant has consequently updated the outline management plans to address the following overarching points:

- 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;
- 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;
- 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;
- 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;
- 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;
- Review of the use of the terms “temporary” and “permanent” to provide greater clarity where works or measures are specific to a particular phase;
- 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;
- 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; and

- 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 Applicant has shared drafts of the various management plans with the Host Authorities and understands that most of the management plans are close to points of agreement with the Host Authorities. Final Statements of Common Ground will be provided at Deadline 7.

5. Development consent order

The Applicant has submitted an updated draft DCO and Explanatory Memorandum [**as updated alongside this submission**] reflecting further refinement and continued discussions with the Host Authorities and statutory undertakers. An overview of the amendments made at this Deadline and the reason for each can be found at Table 6 of the **Schedule of Changes to the Draft Development Consent Order [as updated alongside this submission]**.

The Applicant remains in active discussions with the Host Authorities regarding the content of the draft DCO and good progress has been made. The Applicant has submitted a document, **Summary of outstanding matters on the draft DCO between the Host Authorities and the Applicant [EN010141/DR/8.71]**, to highlight the points that the Applicant understands remain outstanding.

An update on the Applicant’s continued discussions with statutory undertakers is provided in section 6 below.

6. Statutory undertakers and protective provisions

The Applicant is continuing to negotiate with statutory undertakers regarding the provision of bespoke protective provisions within the draft DCO. The Applicant recognises that, at Deadline 4 and Deadline 5 respectively, submissions have been made to the Examination by the following statutory undertakers concerning protective provisions:

- National Gas Transmission PLC (National Gas) [**REP4-042**] and [**REP5-031**];
- National Grid Electricity Transmission PLC (National Grid) [**REP4-043**];
- Network Rail Infrastructure Limited (Network Rail) [**REP4-093**]; and

- Anglian Water Services Limited (Anglian Water Services) **[REP5-029]**.

The Applicant has considered the submissions made by each statutory undertaker and is continuing in its direct discussions. An update in respect of each of these statutory undertakers is provided below:

- **National Gas:** The Applicant is continuing to engage with National Gas regarding the bespoke protective provisions included at Part 4 of Schedule 13 to the draft DCO. The Applicant will provide a further update on the status of negotiations at Deadline 7.
- **National Grid:** The Applicant has been in active discussion with National Grid regarding bespoke protective provisions for its protection. These discussions are very advanced and the Applicant is confident that bespoke protective provisions that are agreed between the parties will be incorporated into the draft DCO for Deadline 7 together with an updated Statement of Common Ground. The Applicant will provide a further update on the status of negotiations at Deadline 7.
- **Network Rail:** The Applicant welcomes the withdrawal of Network Rail Infrastructure Limited's objection to the Scheme (see **[REP4-093]**) and has no further comments to raise at this stage.
- **Anglian Water:** The Applicant has updated the draft DCO **[as updated alongside this submission]** to address the concerns raised in Anglian Water's representation **[REP5-029]**. As requested, the Applicant has updated Requirement 14 (surface water management plan) of the draft DCO to ensure that Anglian Water is consulted on the plan. The Applicant has also added bespoke protective provisions for the protection of Anglian Water at Part 5 of Schedule 13 (protective provisions), which the Applicant understands are agreed with Anglian Water. The Applicant will continue to liaise with Anglian Water to secure the withdrawal of Anglian Water's objection to the Scheme.

Additionally, the Applicant has been contacted by RWE and has agreed a course of action that will ensure that RWE's concerns raised in their relevant representation are appropriately addressed.

7. Virtual Site Inspection

The Applicant submitted 'Virtual Site Inspection' videos at Deadline 4, as set out in Section 3 of the **Applicant's Deadline 4 Cover Letter [REP4-001]**.

The Applicant notes that the 360 video submissions do not appear precisely as the Applicant intended, however, the Applicant trusts that the content can still be understood and engaged with and is of use to the ExA and Interested Parties. The Virtual Site Inspection videos are intended to supplement rather than replace any site visits that have or will be undertaken.

The Applicant again notes that it has prepared an alternative means to view the full videos as single (and interactive) video files, which are available in the Document Library on the Applicant's website at: www.eastparkenergy.co.uk

It should be noted that whilst the full versions of the video files hosted on the Applicant's website present the exact same content as those submitted to the Examination, they should not be relied upon as part of the Examination. The definitive version that Interested Parties should rely upon and reference in any submissions to the Planning Inspectorate are those that are hosted in the Planning Inspectorate's Examination Library.

8. Outline Public Rights of Way Management Plan

The Applicant has continued to consult with relevant landowners with regard Public Rights of Way (PRoW). The Applicant can offer an update with regard a temporary construction phase diversion of Bridleway Bolnhurst and Keysoe 37 and Bridleway Pertenhall 26 that has now been agreed with the relevant landowner. The Applicant has secured a temporary diversion as shown on **Figure 2** in the updated **outline Public Rights of Way Management Plan [as updated alongside this submission]**. This temporary diversion will be provided for as long as construction phase works are happening that would affect the relevant PRoW. The approach to delivering temporary diversions is set out at paragraphs 5.1.4 to 5.1.8 as well as paragraph 5.1.14 of the **oPROWMP [as updated alongside this submission]**.

Whilst the Applicant maintains its previous position that the safety measures proposed for the bridleway are adequate to ensure PRoW user safety, the Applicant also acknowledges

the requests for a temporary diversion, which is secured by Requirement 11 of the **draft DCO [EN010141/DR/3.1]**.

9. ExA's Rule 17 Request dated 16 July 2026

The Applicant provided a response on 04 August 2026 to the ExA's Rule 17 request for further information with the following documents:

- **Applicant Response to Rule 17 Request [AS-034];**
- **Applicant Response to Bushmead Estate [AS-035];** and
- **Funding Statement Rev. P05 [AS-032 and AS-033].**

10. Stop East Park Energy request to vary examination timetable (13 August 2026)

The Applicant has noted Stop East Park Energy's latest submission (dated 13th August 2026) claiming procedural unfairness and requesting a further variation to the examination timetable. The Applicant continues to disagree with the claims made, but recognises that the Examining Authority may choose to grant an additional deadline. The Applicant's only request is that should a further timetable variation be issued, that no additional deadlines are inserted between the current Deadline 6 (18th August) and Deadline 7 (1st September). If an extension is to be granted, then the Applicant's preference would be for a new Deadline 8 to be installed at least a week after the existing Deadline 7.

Please do not hesitate to contact the undersigned representative of the Applicant if you have any questions or require any further information regarding this submission.

Yours sincerely,



DCO Project Manager on behalf of BSSL Cambsbed 1 Limited

