



EAST PARK ENERGY

East Park Energy

EN010141

Statement of Common Ground (Final)

Cambridgeshire County Council

Document Reference: EN010141/DR/8.15

Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009: Regulation 5(2)(q)

September 2026

Version P03

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Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

Statement of Common Ground

**between the Applicant
and
Cambridgeshire County Council**

APFP Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/8.15
Author:	BSSL Cambsbed 1 Ltd / Cambridgeshire County Council

Version	Date	Status
P01	April 2026	Deadline 2
P02	July 2026	Deadline 5
P03	September 2026	Deadline 8

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1.0 INTRODUCTION

1.1 Purpose of this Document

- 1.1.1 This is a Statement of Common Ground (“SoCG”) made between the following parties:

BSSL Cambsbed 1 Ltd (hereafter referred to as the ‘Applicant’)

and

Cambridgeshire County Council (CCC)

- 1.1.1 The purpose and scope of this SoCG is to identify areas of agreement and, as appropriate, areas of disagreement, between the parties in respect of the assessment of the Applicant’s proposals.

1.2 The Scheme

- 1.2.1 The Scheme 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 Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.
- 1.2.2 Subject to the Scheme securing Development Consent in early 2027 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning, lasting for a period of approximately two years.

1.3 The Site

- 1.3.1 The Scheme is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council (BBC) (a unitary authority) and Huntingdonshire District Council (HDC) (a two-tier authority with Cambridgeshire County Council) (the Site). The Site location is shown on **ES Vol 3 Figure 1-1: Site Location [APP-120]**. The Site area extends to approximately 773 hectares (ha).
- 1.3.2 With reference to **ES Vol 3 Figure 1-2: Site References [APP-120]**, for ease of reference the Order Limits have been sub-divided into East Park Sites A to D, in which all of the above ground infrastructure proposed as part of the operational Scheme would be located (excluding works to the Eaton Socon Substation). The Order Limits also cover land outside of East Park Sites A to D which will be required for access, cabling, and the grid connection to the Eaton Socon Substation.
- 1.3.3 With reference to **ES Vol 3 Figure 1-2: Site References [APP-120]**, there are three linear corridors proposed for underground cabling within the Order limits that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation.

1.4 Status of the SoCG

- 1.4.1 This SoCG is the final version of the SoCG at the conclusion of the Examination. It identifies those aspects, matters and issues relating to the Scheme that have been agreed between the parties, together with those not agreed. The following definitions are provided for Matters Agreed or Not Agreed:
- **Matter Agreed** – means that agreement on the point recorded in the SoCG has been reached, having regard to the information available at the date of that version of the document. No further discussion on that matter is considered necessary unless new information, amendments to the Application, or other material changes arise. Agreement on a particular

matter does not, of itself, indicate that the Council supports the Application overall.

- **Not Agreed** – means the Applicant and the Council have reached a clear and settled difference in position such that the matter is not capable of agreement. In these circumstances, further discussion is not expected to resolve the issue.

1.4.2 Where matters are not agreed, the parties have set out the issues to ensure reference and clarity for the Examining Authority.

1.5 Structure of the SoCG

1.5.1 This SoCG is structured as follows:

- Section 2.0 – provides a summary of consultation undertaken with CCC; and
- Section 3.0 – sets out whether matters are ‘agreed’ or ‘not agreed’.

1.5.2 A signing sheet between the Applicant and CCC is provided at Appendix A.

2.0 ROLE OF CAMBRIDGESHIRE COUNTY COUNCIL IN DCO PROCESS AND SUMMARY OF CONSULTATION

2.1 Role of Cambridgeshire County Council

- 2.1.1 CCC is one of three local planning authorities for the area within which the Scheme is located and is a prescribed consultee under Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).
- 2.1.2 CCC is responsible for providing planning, environmental and technical input to the Examination of the application, including through the submission of a Local Impact Report under section 60 of the Planning Act 2008. CCC is Local Highway Authority and Lead Local Flood Authority for the area of Huntingdonshire District Council.
- 2.1.3 Subject to the grant of development consent CCC will be one of the local authorities responsible for the approval of applications made pursuant to the requirements set out in Schedule 2 of the DCO, and for monitoring and taking appropriate enforcement action in respect of compliance with those requirements within its administrative area.

2.2 Summary of Consultation Undertaken

- 2.2.1 The Applicant has consulted with CCC from the earliest stages of the application process, with an initial inception meeting held in June 2023. Since this time, the Applicant has held regular joint progress meetings generally at monthly intervals with Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council (collectively, the 'Host Authorities'). Following submission of the application in October 2025, the frequency of these joint progress meetings has increased to a fortnightly basis.
- 2.2.2 From the outset of the project the Host Authorities requested a joint Planning Performance Agreement (PPA) with the Applicant. To achieve this, the Host

Authorities agreed a separate Memorandum of Understanding between the three Host Authorities setting out areas of delegated authority in order to speak as a 'single voice' on the project. The Applicant is not privy to this Memorandum of Understanding but has supported the approach. The Applicant has agreed a single PPA with the Host Authorities that was signed in July 2025, before being extended to cover the post-submission phase through to the Secretary of State issuing a decision. The PPA includes an intent for the PPA to be extended to cover the post-decision phase, should the Scheme be granted development consent.

2.2.3 It is noted that each Host Authority retains their independence in reviewing the application.

2.2.4 The Applicant has not sought to set out every correspondence or meeting record with the Host Authorities within this SoCG. Key areas of discussion from the pre-application, pre-examination and examination of the project have included:

- Approach to consultation;
- Approach to Environmental Impact Assessment;
- Approach to Scheme design;
- Approach to environmental surveys and assessment;
- Approach to assessment of cumulative effects;
- Approach to the draft Development Consent Order;
- Review and discussion of Host Authorities' Relevant Representations and Local Impact Reports;
- Review of the various outline management plans; and
- Discussions regarding a Highways Side Agreement.

3.0 MATTERS OF AGREEMENT AND DISAGREEMENT

3.1 Introduction

- 3.1.1 The matters covered by the SoCG on which agreement between the parties has been sought include (but are not necessarily limited to) the matters as requested in Annex F of the Examining Authority's **Rule 6 Letter [PD-005]**.
- 3.1.2 The matters that have been agreed or are not agreed between the Applicant and Cambridgeshire County Council are set out in Table 2.

Table 2: Position between the Applicant and Cambridgeshire County Council on matters of discussion / consultation

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
Topic: Draft Development Consent Order				
01	The Articles of the draft DCO set out in Parts 1 to 7.	The Council has reviewed the draft DCO [REP6-006] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant notes this comment and welcomes agreement on the matter with CCC.	Matter Agreed
01a	The disapplication and modification of legislative provisions set out under Article 8 of the draft DCO.	The Applicant has requested the disapplication of section 23 (prohibition on obstructions etc. in watercourses) of the Land Drainage Act 1991, as set out under Article 8 of the Applicant's draft DCO. CCC agrees and consents to the disapplication of these byelaws for the purposes of section 150 of the Planning Act 2008.	The Applicant welcomes agreement on this matter.	Matter Agreed
02	The description of the Authorised Development at Schedule 1 of the draft DCO.	The Council has reviewed the draft DCO [REP6-006] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant notes this comment and welcomes agreement on the matter with CCC.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
03	The Requirements at Part 1 of Schedule 2 of the draft DCO, and the discharge procedure set out in Part 2 of Schedule 2 of the draft DCO.	The Council is of the view the DCO should secure as part of requirement 4 the BNG, BNG is a feature and benefit of the scheme, so should be secured through being included in the DCO. We support the additional wording as submitted by the Applicant (on a without prejudice basis [REP6-054] to be included in the DCO.	The Applicant disagrees that it is necessary to secure BNG on the face of the DCO, when it is already secured by the outline Landscape and Ecological Management Plan [REP6-038]. The Applicant's position in relation to BNG and Requirement 4 is set out at Item 6 in the Summary of outstanding matters on the draft DCO between the Host Authorities and the Applicant [REP6-073]. The Applicant has however prepared an updated requirement on a without prejudice basis, which sets out the wording that the Applicant would propose is used in the event that the Secretary of State is minded to include a requirement securing BNG on the face of the DCO. This is submitted at [REP6-054].	Matter Not Agreed
04	The highways and rights of way works set out in Schedules 4 to 8 of the draft DCO.	The Council has reviewed the draft DCO [REP6-006] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant notes this comment and welcomes agreement on the matter with CCC.	Matter Agreed
05	The hedgerow works set out in Schedule 12 of the draft DCO.	The Council has reviewed the draft DCO [REP6-006] . No further discussion on this matter is considered necessary unless new information, amendments to the	The Applicant notes this comment and welcomes agreement on the matter with CCC.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		Application, or other material changes arise.		
06	The Protective Provisions set out in Schedule 13 of the draft DCO	Local Highway Authority: CCC and Bedford Borough Council are negotiating a separate Highways Side Agreement with the Applicant which, once concluded, would remove the need for protective provisions for the benefit of the Councils in their capacity as local highway authorities. The agreement is close to being finalised, but it has not been possible to conclude it prior to the close of the Examination. Accordingly, at Deadline 8, the Councils have submitted preferred protective provisions based on those contained in Part 6 of Schedule 15 to the Cambridge Waste Water Treatment Plant Relocation Order 2025. The Councils request that the Examining Authority takes these protective provisions into account in making its recommendation to the Secretary of State. However, the Councils' approach remains to conclude the Highways Side Agreement. Should that agreement be concluded with the Applicant, the Councils will notify the Examining Authority accordingly and confirm that the protective provisions submitted at Deadline 8 are no longer required.	The Applicant notes this comment and welcomes agreement on the protective provisions at Part 3 of Schedule 13 of the draft DCO [REP6-006] for the benefit of CCC as local drainage authority. In relation to highways, the Applicant's position remains that separate protective provisions for the benefit of the local highway authorities are not necessary, for the reasons set out at reference CCC-RR-24 of the Applicant Responses to Relevant Representations - Host Authorities, Statutory Environmental Bodies, and Other Interested Parties [REP1-055]. The Applicant's preferred approach is to conclude the Highways Side Agreement currently being negotiated with CCC and Bedford Borough Council. However, in the event that the Highways Side Agreement is not concluded, the Applicant has submitted at Deadline 8 its preferred form of protective provisions for the benefit of the local highway authorities. These are submitted on a precautionary and without prejudice basis and should not be taken as altering the Applicant's position that separate highways protective provisions are not required.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		Lead Local Flood Authority: CCC would prefer that the deemed consent mechanism in paragraph 19(3)(b) of Part 3 of Schedule 13 was not included. However, CCC acknowledges the Applicant's position that such mechanisms are established practice in DCO protective provisions and, on that basis, raises no objection to its retention. CCC are therefore content with the protective provisions at Part 3 of Schedule 13 of the draft DCO [REP6-006] for the benefit of CCC as local drainage authority.		
07	The list of documents to be certified, set out in Schedule 15 of the draft DCO.	The Council has reviewed the draft DCO [REP6-006] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant notes this comment and welcomes agreement on the matter with CCC.	Matter Agreed
Topic: Other Consents and Licences				
08	The Applicant's scope of other consents and licences required for the Scheme, and the approach to obtaining these.	The council has reviewed the information available at the date of that version of the document. No further discussion on this matter is considered necessary unless new information, amendments to the	The Applicant notes this comment and welcomes agreement on the matter with CCC.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		Application, or other material changes arise.		
Topic: Control Documents				
09	The scope of the Design Parameters and Principles Document.	The council has reviewed the information available at the date of that version of the document. No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
10	The scope of the outline Construction Environmental Management Plan	The Council has reviewed the latest oCEMP [REP6-030] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
11	The scope of the outline Construction Traffic Management Plan	The Council has reviewed the latest oCTMP [REP6-032] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
12	The scope of the outline Operational	The Council has reviewed the latest oOEMP [REP6-034] . No further discussion on this matter is considered	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
	Environmental Management Plan	necessary unless new information, amendments to the Application, or other material changes arise. To note CCC concerns about at scale replacement, the relevant management plans, and critically the Outline Operational Environmental Management Plan have been updated to include at scale replacement.		
13	The scope of the outline Decommissioning Environmental Management Plan	The Council has reviewed the latest oDEMP [REP6-036] and has requested that the Applicant update paragraph 2.4.2 of the oDEMP at Deadline 8 to provide a commitment that the benefits/impacts analysis identifying any underground infrastructure proposed to be left in situ will be shared with the relevant Minerals and Waste Planning Authorities. The Council understand that the Applicant has updated the oDEMP for submission at Deadline 8 and therefore, no further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
14	The scope of the outline Landscape and Ecological Management Plan	The Council welcomes the progress made by the applicant to address many of the	The Applicant has provided a response on the two matters raised at Item 29 in	Matter Not Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		County Council's concerns in oLEMP [REP6-038]. The outstanding issues are: The adequacy of the proposed mitigation for ground-nesting birds, notably skylark, which remain a matter not agreed as per Item 29 below. In addition, the Council remains unsatisfied with the current permissive path offering included in the oLEMP [REP6-038], both in terms of its potential to offset the impacts of the development, and the benefits it can bring to affected communities. This is supported by EN1 Paragraph 5.11.24 states '<i>where possible, to <u>mitigate</u> any adverse impact and, where appropriate, to <u>improve</u></i>' and Paragraph 5.11.30 '<i>facilities for example for walkers, cyclists and horse riders. ...other rights of way and open access land and, where appropriate, to consider what opportunities there may be to <u>improve or create new access</u>..</i>' We wished to see either increased permissive path and status provision, as previously requested, or funding to improve the public rights of way in the area as mitigation for the proposed development. This disagreement is recorded under Item 39 below.	relation to skylark, and at Item 39 in relation to permissive access. The Applicant does not agree that further permissive paths, changes to the status of the proposed paths or a financial contribution towards the wider PRow network are required. In addition to retaining all existing PRow during the operational phase, the Scheme will provide approximately 5.3km of additional permissive access for its operational lifetime. This includes a 2.35km route available for equestrian use between the B660 Kimbolton Road and Green End, together with pedestrian connections in Site B and approximately 2km of new pedestrian access in Site C. The provision and maintenance of those routes are secured through Work No. 8, the oLEMP and Requirement 4 of the draft DCO.	

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
15	The scope of the outline Public Rights of Way Management Plan	The Council has reviewed the latest oPROWMP [REP6-040] . As it relates to the scope there are no further comments however reference should be made to row 14 above and row 39 of this SoCG. The council remains unsatisfied with the current permissive path offering and protection of permissive paths.	The Applicant welcomes agreement with CCC on the oPROWMP and has responded in relation to permissive paths at Item 39.	Matter Agreed
16	The scope of the outline Soil Management Plan	CCC is satisfied with the outline Soil Management Plan, insofar as it relates to matters relevant to CCC's statutory functions.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
17	The scope of the outline Battery Safety Management Plan	CCC Emergency Response Plan to be produced – detail needs to include informing health services of an incident. This has been added in the latest oBSMP [REP6-044] to the Council's satisfaction. CCC is aware that the Applicant has agreed a Statement of Common Ground separately with Cambridgeshire Fire and Rescue Service.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
18	The scope of the outline Skills, Supply Chain and Employment Plan	CCC agrees Requirement 19, final Skills Supply Chain and Employment Plan (SSCEP) to include further analysis of local skills gaps and provision, and a programme of stakeholder engagement.	The Applicant has set out that the oSSCEP establishes an overarching framework and commitments for maximising local employment, skills development and supply chain opportunities.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
			Requirement 19 of the draft DCO [AS-008] secures the submission of a final Skills Supply Chain and Employment Plan (SSCEP), following consultation with the relevant local planning authorities, prior to commencement of construction. The final SSCEP will include further analysis of local skills gaps and provision, identification of tailored initiatives, measurable outputs, and a clear programme for stakeholder engagement, thereby providing the route map sought by CCC.	
19	The scope of the outline Waste Management Plan	The Council has reviewed the latest oWMP [REP6-046] . No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant welcomes agreement from CCC on this matter.	Matter Agreed
20	The scope of the outline Surface Water Management Plan	CCC raised points of clarity in relation to the oSWMP within its relevant representation. The Applicant has reviewed and updated the outline Surface Water Management Plan (Revision P05) for Deadline 8, and CCC confirm agreement with the Deadline 8 version.	The Applicant welcomes agreement with CCC on this matter. The updated oSWMP (Revision P05) has been submitted at Deadline 8.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
21	The scope of the outline Archaeological Mitigation Strategy	CCC is satisfied with the oAMS provided REP2-034. CCC is satisfied with Site D trial trenching report. This was provided REP2-018.	The Applicant welcomes agreement from CCC on this matter.	Matter Agreed
22	The scope of the outline Heritage Enhancement Strategy	CCC consider the oHES to be satisfactory and support the measures proposed.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
23	The approach to mitigation for Site Preparation Works	CCC agrees with the Applicant's approach to mitigating any site preparation works.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Project Benefits				
24	The benefits of the Scheme set out in Section 5 of the Planning Statement.	CCC agree with the project benefits listed under Section 5 of the Planning Statement. The level (or weighting) of each benefit identified to be agreed.	The Applicant notes this comment.	Matter Agreed
Topic: Archaeology				
25	The Applicant's approach to archaeological investigation.	CCC is satisfied following the final report for Site D REP2-018. Some of the programme of archaeological evaluation took place too late to inform the Environmental Statement, and elements of	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		intrusive evaluation, such as grid connection corridors, that would ideally have taken place pre-consent, are now proposed as a requirement of any Development Consent Order. CCC is satisfied with that in the oAMS REP2-034 for this.		
26	The conclusions of the assessments with respect to archaeology.	CCC is satisfied with the final report for Site D REP2-018. The outline Archaeological Mitigation Strategy REP2-034 has confirmed impacts can be avoided during both construction and operation.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Ecology and Biodiversity				
27	The study areas and methodology used for the assessment of ecological receptors and resources.	CCC agree with the study areas and methodology used for the assessment of ecological receptors and resources.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
28	The baseline data for the assessment of ecological receptors and resources.	The Applicant has addressed CCC's previous concerns through revisions of documents, demonstrating that impacts to water vole and roosting bats are unlikely, and the inclusion of mitigation measures (e.g. minimal lighting) and pre-	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		commencement surveys as part of the oCEMP [REP6-030].		
29	The measures proposed to mitigate impacts to ecological receptors and resources.	The Council welcomes the progress made by the applicant to address many of the County Council's concerns. The outstanding issue is: Skylark nest sites – the applicant has demonstrated that the scheme will result in loss of 35% of skylark territories and, as a worse case scenario, could result in adverse impact to breeding skylarks. However, the applicant proposes these losses could be compensated through improved breeding success of skylarks on-site and wider landscape as a result of improved foraging habitat. While this approach seems logical, there appears to be no research demonstrating that NSIP solar farms can improve breeding success of support local skylark population at this time. Therefore, the Council seek commitment to contribution to research on the effects of large-scale solar farms on the local skylark populations.	The Applicant welcomes CCC's recognition of the progress made, and that skylark nesting is the only remaining point of disagreement. The Applicant refers to its responses at CCC-D2-62 to CCC-D2-65 in [REP3-073], CCC-D5-52 to CCC-D5-54 and CCC-D5-78 in [REP6-051], and the Technical Note on Skylark Metric [REP6-055]. For clarity, the 35% figure is not a predicted 35% reduction in the baseline or local skylark population. It is the residual reduction in territories generated by the prototype Fox territory metric after its allowance for edge territories. That metric does not account for repeat nesting attempts, fledging success or other aspects of breeding productivity. It predicts that the proposed mitigation areas could support 70 territories directly, with a further 17 accounted for through adjacent land effects. Productivity within the supported territories would need to be approximately 1.54 times the baseline level to maintain parity, which the Technical Note [REP6-055] concludes is within realistic bounds. The Applicant acknowledges that evidence specifically concerning breeding	Matter Not Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
			productivity at operational NSIP-scale solar farms remains developing. However, the mitigation does not assume that skylark will breed beneath the arrays and is not unsupported. The oLEMP [REP6-038] secures at least 125 ha of dedicated open grassland for nesting, managed to facilitate repeated nesting attempts throughout the breeding season, together with complementary foraging resources within and around the arrays. The ES adopts a precautionary approach and identifies a minor adverse, not significant effect on ground-nesting birds. The relevant objective is to maintain the conservation status and productivity of the local population, rather than to replace each territory numerically. The oLEMP also secures project-specific breeding bird surveys in years 1, 3 and 5 and every five years thereafter. Maintenance and Monitoring Reports will be submitted to the relevant local planning authorities, and the results will inform reviews of the management regime and any necessary remedial measures. The monitoring findings will therefore be shared with the Host Authorities as part of the secured monitoring and reporting framework. The Applicant would be content for relevant monitoring findings to be made	

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
			publicly available and, where appropriate, shared with research bodies so that they may inform wider research into the effects of large-scale solar farms on skylark populations. The Applicant has updated paragraph 8.1.6 of the oLEMP [as updated alongside this submission] to include a commitment to share monitoring data with the relevant Local Environmental Records Centre(s).	
30	The conclusions in respect of the assessment of impacts and effects to ecological receptors and resources.	CCC agree with the Applicant's assessment in respect of statutory designated sites for nature conservation. CCC has raised points of clarity in relation to some non-statutory designated sites and protected species. The Council considers issues have been addressed through the examination process, including updates to submission documents.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
31	The biodiversity net gain assessment.	CCC requested further detail on how BNG is secured through the draft DCO; and further clarity with regard baseline condition data. The Council considers issues have been addressed through the examination process, including updates to submission documents.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
Topic: Habitats Regulations Assessment				
32	The Applicant's conclusion that the Scheme will not have adverse effects on the integrity of a European Site.	CCC agree with the Applicant's assessment that the Scheme will not have adverse effects on the integrity of a European Site.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Flood Risk and Drainage				
33	The Applicant's Flood Risk Assessment.	CCC raised points of clarification in its relevant representation, and responded to the Applicants response in REP1-055 at REP2-049 in relation to modelling for surface water flood risk, and drainage layouts. Matters of further clarity were in CCC response at [REP4-033]. The Applicant has reviewed and updated the outline Surface Water Management Plan (Revision P05) for Deadline 8, and CCC confirm agreement with the Deadline 8 version.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Water Quality and Resources				
34	The approach to assessing impacts and	CCC in so far as its role as Lead Local Flood Authority accepts the conclusions of	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
	effects on the water environment.	the Applicants assessment of impacts to the water environment.		
35	Water Framework Directive Water Bodies	This is within the remit of the Environment Agency, not the LLFA. CCC in so far as its role as Lead Local Flood Authority consider the Applicant's WFD Assessment to be adequate, subject to the required mitigation being secured through the draft DCO.	The Applicant notes this comment.	Matter Agreed
Topic: Traffic and Transport				
36	The study areas and methodology used for the assessment of traffic and transport impacts and effects.	CCC agree with the study area and methodology used to assess the impact of construction traffic on the highway and PRoW network.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
37	The baseline data for the assessment of traffic and transport impacts.	CCC agree with the baseline data for the assessment of traffic and transport impacts.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
38	The measures proposed to mitigate traffic and transport impacts.	CCC has raised a number of concerns or points of clarity in relation to the mitigation of impacts, including further detail and commitments on junction mitigation, staff travel/minibus provision, monitoring and highway authority approvals.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		The Council considers issues have been addressed through the examination process, including updates to submission documents.		
39	The measures proposed to mitigate impacts on users of public rights of way.	CCC is broadly satisfied with the approach taken to mitigate impacts on users of public rights of way, and the approach taken to the oPROWMP. However, CCC remains unsatisfied with the current permissive path offering included in the oLEMP [REP6-038], both in terms of its potential to offset the impacts of the development, and the benefits it can bring to affected communities. We wished to see either increased permissive path and status provision, as previously requested, or funding to improve the public rights of way in the area as mitigation for the proposed development. In addition, CCC retains some concerns about the robustness of measures included in the oPROWMP [REP6-040] for the protection of the permissive access routes proposed for Site C. The following amendments have been requested: Paragraph 7.2.5 outlines conditions under which temporary or permanent closures of the permissive paths may be considered. However, as paragraph 7.2.6 addresses the potential for “permanent closure or	The Applicant welcomes CCC’s confirmation that it is broadly satisfied with the measures proposed to mitigate impacts on users of public rights of way and with the overall approach taken in the oPROWMP [REP6-040]. The Applicant does not agree that further permissive paths, changes to the status of the proposed paths or a financial contribution towards the wider PRow network are required. In addition to retaining all existing PRow during the operational phase, the Scheme will provide approximately 5.3km of additional permissive access for its operational lifetime. This includes a 2.35km route available for equestrian use between the B660 Kimbolton Road and Green End, together with pedestrian connections in Site B and approximately 2km of new pedestrian access in Site C. The provision and maintenance of those routes are secured through Work No. 8, the oLEMP and Requirement 4 of the draft DCO. The Applicant has considered CCC’s requested amendments to paragraphs 7.2.5 and 7.2.6 of the oPROWMP [REP6-	Matter Not Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		material reduction” of the permissive paths, references to “closure” of the paths made in 7.2.5 should be restricted to temporary closures only. This will remove any potential for confusion over the conditions under which a path may be closed. - CCC requires that any consideration for the temporary closure of a permissive path should only take place after evidence of a “substantiated pattern of repeated antisocial behaviour” is provided to the local highway authority with a minimum of 20 working days’ notice, including all relevant incidents recorded in the incident log. This will facilitate the consideration of possible further measures to restrict the antisocial behaviour. - Paragraph 7.2.6 should require the same level of evidential justification to be provided by the operator to the relevant authorities in order to seek a permanent closure, however in this case there should be a minimum notice period of 40 working days. The requirement for written approval from the relevant authorities must be retained. - The final sentence of paragraph 7.2.5 should be amended to state that	040] but does not agree that they are necessary. Paragraphs 7.2.4 to 7.2.6 operate together as a coherent and proportionate framework. Paragraph 7.2.5 establishes the evidential threshold applicable to closure of a permissive path, requires relevant incidents to be recorded, requires material or repeated incidents to be reported to the relevant authorities, and requires consultation on the proportionate management response. Paragraph 7.2.6 then provides an additional safeguard for any permanent closure or material reduction in the permissive path network, which cannot be implemented without the prior written approval of the relevant local planning authority following consultation with the relevant highway authority. The proposed fixed notice periods are not considered necessary or appropriate. A single serious incident may give rise to an immediate and unacceptable risk, and it would not be reasonable to require a pattern of repeated incidents or 20 working days’ notice before proportionate temporary action could be taken. Where an urgent temporary closure is required, the existing requirement to notify the authorities “as soon as reasonably practicable” may require notification considerably sooner than five working days and is therefore more responsive than CCC’s proposed wording. The need	

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
		“where an urgent temporary closure is required for safety or security reasons, the relevant local highway authority and local planning authority will be notified within 5 working days. Such notification will include details outlining the reasons for the emergency closure and an outline timeframe for the re-opening of the affected permissive path, with the expectation that emergency closures will not exceed 20 working days’ duration.” Note that these comments also apply to paragraphs 5.3.50 and 5.3.51 of the oLEMP [REP6-038].	for continued closure must also be reviewed in consultation with those authorities. A presumptive 20 working day maximum closure could require a path to be reopened before the underlying safety or security risk had been resolved. Similarly, a separate 40 working day notice period for permanent closure would add no necessary safeguard. Permanent closure already requires prior written approval, enabling the relevant local planning authority, following consultation with the highway authority, to scrutinise the evidence, request further information and refuse or appropriately control any proposal. The Applicant therefore considers the existing provisions of the oPROWMP [REP6-040] and the corresponding provisions at paragraphs 5.3.50 and 5.3.51 of the oLEMP [REP6-038] to be appropriately robust and proportionate and does not propose to amend them.	
40	The conclusions in respect of the assessment of traffic and transport impacts and effects.	CCC considers that the conclusions of the assessment of traffic and transport impacts are acceptable.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
Topic: Climate Change				
41	The methodology used for the assessment of climate change impacts and effects.	CCC agree with the methodology used for the assessment of climate change impacts and effects.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
42	The baseline data for the assessment of climate change impacts.	CCC agree with the baseline data for the assessment of climate change impacts.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
43	The measures proposed to mitigate climate change impacts.	CCC agree with the measures proposed to mitigate impacts on climate change. Further measures should be discovered on site during construction have been added to the oCEMP [REP6-030] which the Council are satisfied with.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
44	The conclusions in respect of the assessment of climate change impacts and effects.	CCC agree with the conclusions of the climate change assessment.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Human Health				
45	The conclusions in respect of the Scheme's effects on human health.	CCC agree with the conclusions of the Scheme's effects on human health.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

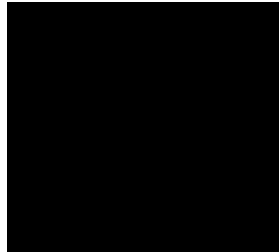
Ref.	Summary of Matter	CCC Position	Applicant Position	Status
Topic: Waste				
46	The Applicant's assessment of waste impacts.	CCC agree with the conclusions of the assessment of waste impacts.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Major Accidents and Disasters				
47	The conclusions in respect of major accidents and disasters.	CCC agree with the conclusions in respect of major accidents and disasters. CCC with regard to the Battery Safety Management Plan provided comments at ISH4 and Written summary at REP4-035. (See row 17). These matters have now been addressed to the Council's satisfaction.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed
Topic: Electromagnetic Fields				
48	The conclusions in respect of the Scheme's impacts arising from electromagnetic fields.	CCC has no comments regarding the impact from electromagnetic fields.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

Ref.	Summary of Matter	CCC Position	Applicant Position	Status
Topic: Compulsory Acquisition				
49	The land rights sought by the Applicant through the draft DCO insofar as they relate to CCC.	The Council has reviewed the information available at the date of that version of the document. No further discussion on this matter is considered necessary unless new information, amendments to the Application, or other material changes arise.	The Applicant welcomes agreement with CCC on this matter.	Matter Agreed

APPENDIX A

BSSL Cambsbed 1 Ltd

Name:



Signature:

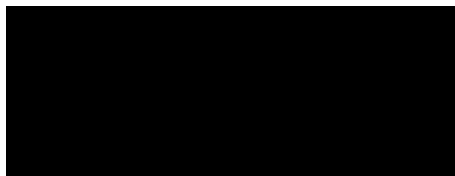
Position: Head of Project Development

On behalf of: BSSL Cambsbed 1 Ltd

Date: 11.09.2026

Cambridgeshire County Council

Name:



Signature:

Position: Executive Director of Place and
Sustainability

On behalf of: Cambridgeshire County Council

Date: 11 September 2026
