



EAST PARK ENERGY

East Park Energy

EN010141

Statement of Common Ground (Final)

Huntingdonshire District Council

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Procedure) Regulations 2009: Regulation 5(2)(q)

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EAST PARK ENERGY

Planning Act 2008

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

Statement of Common Ground

**between the Applicant
and
Huntingdonshire District Council**

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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

Huntingdonshire District Council (HDC)

- 1.1.1 The purpose and scope of this SoCG is to identify areas of agreement, areas under discussion 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). Sites C and D are located in the Huntingdonshire District Council area. 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 Council has 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 HDC; and
- Section 3.0 – sets out whether matters are ‘agreed’, or ‘not agreed’.

1.5.2 A signing sheet between the Applicant and HDC is provided at Appendix A to be signed on final agreement.

2.0 ROLE OF HUNTINGDONSHIRE DISTRICT COUNCIL IN DCO PROCESS AND SUMMARY OF CONSULTATION

2.1 Role of Huntingdonshire District Council

- 2.1.1 HDC 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 HDC is responsible for the preparation and implementation of the development plan for its area and for providing local 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.
- 2.1.3 Subject to the grant of development consent HDC will be one of the local planning 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 HDC 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; and
 - Review of the various outline management plans.

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 Huntingdonshire District Council are set out in Table 2.

Table 2: Position between the Applicant and Huntingdonshire District Council on matters of discussion / consultation

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
Topic: Draft Development Consent Order				
01	The Articles of the draft DCO set out in Parts 1 to 7.	HDC has no objections to the Articles contained within Parts 2 to 7 of the draft DCO, insofar as they relate to HDC's statutory functions and remit. In relation to Part 1, HDC and 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 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	The Applicant welcomes agreement with HDC on this matter. The Applicant's response in relation to the inclusion of replacement works within the DCO is set out with reference to Item 1 in the Summary of outstanding matters on the draft DCO between the Host Authorities and the Applicant [REP6-073].	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		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.		
02	The description of the Authorised Development at Schedule 1 of the draft DCO.	HDC and the other Host Authorities have requested that the Applicant updates Schedule 1 to the draft DCO to clarify what works are permanent and what works are temporary in the context of the Application. HDC has reviewed the Applicant's updates to the relevant management plans submitted at Deadline 6. Whilst those management plans are now agreed, the requested amendments to Schedule 1 have not been made. The parties have therefore reached a clear and settled difference of position on this matter, and it is not considered capable of agreement. The outstanding areas of disagreement and unresolved drafting points are set out in the Summary of Outstanding Matters on the Draft DCO Between the Host Authorities and the Applicant (P01) [REP6-053].	The Applicant's position on this matter is set out with reference to Item 3 in the Summary of outstanding matters on the draft DCO between the Host Authorities and the Applicant [REP6-073]. The Applicant considers that it is inappropriate to circumscribe the duration of works through the DCO itself. Instead, the Applicant's preferred approach is for clarification as to the temporary/permanent nature of works to be provided through the management plans.	Matter Not Agreed

Ref.	Summary of Matter	HDC 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.	<u>Various Requirements</u> As set out at Row 1 of this table, HDC and the Host Authorities' in-principle position is that the "replacement phase" should be embedded within the DCO and the various requirements relating to the submission of management plans should trigger the resubmission of updated management plans. Nonetheless, without prejudice to this in-principle position, the Host Authorities accept the Applicant's approach 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. <u>Requirement 4</u> HDC and the Host Authorities have requested that the Applicant introduces a new sub-paragraph to Requirement 4 (LEMP) to ensure that the plan would secure the biodiversity net gain ("BNG") committed by the Applicant (minimum 70% net gain in area-based habitat units,	The Applicant notes HDC's position and has set out its response in relation to the replacement works with reference to Items 1 and 5 in the Summary of outstanding matters on the draft DCO between the Host Authorities and the Applicant [REP6-073]. 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 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

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		30% net gain in hedgerow units; and 5% in watercourse units). The Applicant does not agree that it is necessary to secure BNG by way of requirement, however an updated requirement has been prepared on a without prejudice basis [REP6-054], which is supported by HDC. HDC's position is that this matter has not been agreed, unless the Applicant inserts the BNG Requirement wording into the draft DCO. The outstanding areas of disagreement and unresolved drafting points are set out in the Summary of Outstanding Matters on the Draft DCO Between the Host Authorities and the Applicant (P01) [REP6-053].		
04	The highways and rights of way works set out in Schedules 4 to 8 of the draft DCO.	HDC has reviewed Schedules 4 to 8 of the draft DCO and has no comment to make, deferring to Cambridgeshire County Council (CCC) as Local Highway Authority.	The Applicant notes this comment.	Matter Agreed
05	The hedgerow works set out in Schedule 12 of the draft DCO.	The hedgerow works set out in Schedule 12 of the draft DCO include part removal of hedgerow in three locations within HDC's administrative boundary. HDC is satisfied the hedgerow removal has been adequately assessed in the Environmental Statement and mitigation is secured	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		through the draft DCO and outline management plans.		
06	The Protective Provisions set out in Schedule 13 of the draft DCO	There are no protective provisions set out in Schedule 13 of the draft DCO relevant to HDC. Comments are deferred to Cambridgeshire County Council (CCC) as Local Highway Authority.	The Applicant notes this comment.	Matter Agreed
07	The list of documents to be certified, set out in Schedule 15 of the draft DCO.	The list of documents to be certified as set out in Schedule 15 of the draft DCO is considered acceptable, subject to document revision numbers being updated in the final draft DCO.	The Applicant notes this comment and can confirm that final document revision numbers will be inserted in the final draft DCO to be submitted at Deadline 8.	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.	HDC has reviewed the list of other consents and licences set out in the Applicant's Other Consents and Licences Statement [REP3-021] and has no comment to make as Local Planning Authority, deferring to Cambridgeshire County Council (CCC) as Local Highway Authority and Lead Local Flood Authority and other relevant statutory bodies.	The Applicant notes this comment and will continue to engage with CCC on these matters.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
Topic: Control Documents				
09	The scope of the Design Parameters and Principles Document.	HDC has reviewed the Applicant's Design Parameters and Principles Document [REP4-023] and the scope is agreed.	The Applicant welcomes agreement on this matter.	Matter Agreed
10	The scope of the outline Construction Environmental Management Plan	HDC broadly agrees with the scope of the oCEMP [REP6-030] . The Applicant submitted an amended oCEMP at Deadline 6, which substantially addresses the comments raised by HDC in Appendix A of HDC's Deadline 4 Submission Letter [REP4-036] . The scope of the document is therefore considered acceptable. It is noted that the final CEMP will need to be submitted to and approved by the Local Planning Authority prior to the commencement of construction, in accordance with requirement 5.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
11	The scope of the outline Operational Environmental Management Plan	HDC is in-principle supportive of the outline Operational Environmental Management Plan (oOEMP), insofar as it relates to matters relevant to HDC's statutory functions. The Applicant submitted an amended oOEMP [REP6-034] at Deadline 6, which substantially addresses the comments raised by HDC in Appendix A of HDC's Deadline 4 Submission Letter [REP4-036] . HDC also notes the additional clarification provided	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		through the Applicant's Technical Note on Replacement Works and subsequent amendments to the oOEMP regarding the management of replacement activities. It is noted that the final OEMP will need to be submitted to and approved by the Local Planning Authority prior to final commissioning for any phase of the authorised development, in accordance with Requirement 9.		
12	The scope of the outline Decommissioning Environmental Management Plan	HDC considers the outline Decommissioning Environmental Management Plan to be acceptable. The Applicant submitted an amended oDEMP [REP6-036] at Deadline 6, which substantially addresses the comments raised by HDC in Appendix A of HDC's Deadline 4 Submission Letter [REP4-036] . It is noted that the final DEMP will need to be submitted to and approved by the Local Planning Authority prior to the commencement of decommissioning, in accordance with Requirement 18.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
13	The scope of the outline Landscape and Ecological Management Plan	HDC broadly agrees with the scope of the oLEMP [REP6-038] . The Applicant submitted an amended oLEMP at Deadline 6, which substantially addresses the comments raised by HDC in Appendix A of HDC's Deadline 4 Submission Letter [REP4-036] . The scope of the document	The Applicant welcomes agreement with HDC on this matter. The Applicant has made the requested amendment to the outline Farmland Bird Mitigation Strategy to set out the land parcels proposed for farmland bird mitigation.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		is therefore considered acceptable. In relation to Appendix C Outline Farmland Bird Mitigation Strategy (oFBMS), HDC requested the inclusion of a more detailed summary of the areas of the land parcels proposed for farmland bird mitigation. The Applicant has submitted an updated draft oFBMS including a table identifying the area of each relevant land parcel to aid future compliance monitoring, which is welcomed. It is noted that the final LEMP will need to be submitted to and approved by the Local Planning Authority prior to commencement of any phase, in accordance with Requirement 4.		
14	The scope of the outline Soil Management Plan	The Applicant updated the oSMP [REP6-042] at Deadline 6 to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase. HDC is therefore satisfied that concerns have been addressed and the oSMP is agreed.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
15	The scope of the outline Battery Safety Management Plan	HDC supports the outline Battery Safety Management Plan [REP6-044] in principle, noting that the detailed content, technical adequacy and acceptability of the document are matters for Cambridgeshire Fire and Rescue Service (and the Environment Agency where	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		applicable) in their capacities as consultees identified in Schedule 2 of the draft DCO.		
16	The scope of the outline Skills, Supply Chain and Employment Plan	HDC welcomes the inclusion of an Outline Skills Supply Chain and Employment Plan (oSSCEP) [APP-163] in so far as it is an overarching framework and is in agreement subject to final SSCEP including further analysis of local skills gaps and provision, identification of tailored initiatives, measurable outputs, and a clear programme for stakeholder engagement. Without this, HDC considers that the potential for the Scheme to have positive economic benefits for its residents would not be fully supported by the oSSCEP as currently drafted.	The Applicant has set out that the oSSCEP establishes an overarching framework and commitments for maximising local employment, skills development and supply chain opportunities. 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 HDC.	Matter Agreed
17	The scope of the outline Heritage Enhancement Strategy	HDC consider the oHES to be satisfactory but defers to Cambridgeshire County Council (CCC) given its focus on archaeological assets.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
18	The approach to mitigation for Site Preparation Works	HDC agrees with the Applicant's approach to mitigating any site preparation works insofar as it relates to matters relevant to HDC's statutory functions.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Project Benefits				
19	The benefits of the Scheme set out in Section 5 of the Planning Statement.	HDC notes the project benefits identified in Section 5 of the Planning Statement. HDC does not attribute weight to the benefits as this is ultimately a matter for the Examining Authority and Secretary of State. HDC agrees with the benefits identified in Section 5.2 'Project Benefits Addressing Identified National Needs'. HDC also agrees with the benefits identified in Section 5.3 'Project Benefits Addressing Identified Local Needs', although the extent of local economic benefits associated with construction employment, operational roles and supply chain opportunities is dependent on the delivery of a satisfactory Skills, Supply Chain and Employment Plan secured through Requirement 19 of the dDCO [REP3-009]. HDC further agrees that the Scheme may deliver additional benefits in relation to local economic investment and biodiversity enhancement during the operational lifetime of the Scheme.	The Applicant welcomes HDC's agreement that the Planning Statement appropriately identifies the principal benefits and adverse effects associated with the Scheme, including the national and local benefits identified in Sections 5.2 and 5.3. The Applicant notes HDC's observations regarding the delivery, evidential basis and temporary nature of certain benefits, and acknowledges that the weight to be attributed to the identified benefits and adverse effects is ultimately a matter for the Examining Authority and Secretary of State. This matter is therefore agreed. In relation to HDC's position that the benefits should be considered in the context of the temporary nature of the development, the Applicant's position is that almost all of the benefit and harm arising from the Scheme should be considered in the context of the temporary nature of the development.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		However, HDC considers that these benefits should be considered in the context of the temporary nature of the development. In particular, there is no assurance that landscaping and biodiversity enhancements would be retained following decommissioning. HDC maintains that further evidence would be required to substantiate the claimed benefits associated with the Agrisolar Research Area. Nevertheless, HDC acknowledges that the Applicant has identified these as potential benefits of the Scheme. HDC also notes the adverse effects identified by the Applicant within the Planning Statement and Environmental Statement, including residual landscape and visual effects, effects on heritage assets, and impacts on best and most versatile agricultural land. HDC acknowledges the benefits and adverse effects identified by the Applicant. Whilst the Council has expressed the observations set out above regarding certain claimed benefits, it agrees that the Planning Statement appropriately identifies the principal benefits and adverse effects associated with the Scheme. HDC does not attribute weight to these matters, as the planning balance is	In relation to the Agrisolar Research Area, the Applicant acknowledges that whilst discussions have been ongoing with Rothamsted as to their aspirations for the area, the specific research projects that would be pursued are not yet defined, and a detailed research strategy is not yet in place.	

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		ultimately a matter for the Examining Authority and Secretary of State.		
Topic: Landscape and Visual				
20	The study area and methodology used for the landscape and visual impact assessment.	HDC has raised points in its Local Impact Report [REP1-078] with regards to LVIA methodology, the approach to determining significant effects and the extent to which the assessment considers long-term landscape effects. The applicant has responded to this in '8.34 Applicant Response to Deadline 2 Submissions - Host Authorities and Statutory Environmental Bodies P01' [REP3-073]. The applicant has also provided a further response to the Host Authorities' collective comments on the LVIA at Appendix C of the Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 3 (ISH3) and Action Points [REP4-110]. HDC remains of the view that the ES does not provide sufficient justification as to why certain operational effects assessed as moderate are not identified as significant effects. HDC's overall conclusion in respect of this matter is that there is some slight under-representation of significant effects and that the screening of views as a result of	The Applicant welcomes agreement with HDC on this matter. As set out in response BBC-D2-16 of [REP3-073] and Appendix C of [REP4-110], the Applicant maintains that the methodology used for the assessment of impacts and effects is in accordance with published best practice, including the application of professional judgement in determining significance. The Applicant considers that the LVIA appropriately identifies the likely significant effects of the Scheme.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		mitigation planting has generally been assessed as an improvement to magnitude of impact and not been assessed as a potentially adverse change. However, the Council does not consider this to represent a fundamental disagreement with the methodology or one that would require substantial changes to the assessment approach. On this basis, HDC has no further comments on the LVIA methodology and the matter is agreed.		
21	The baseline data for the landscape and visual impact assessment.	HDC agree in principle with the landscape character areas and approach to identifying representative viewpoints and visual receptors for the purposes of the assessment.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
22	The measures proposed to mitigate landscape and visual effects.	HDC consider that the landscape proposals are tailored to the location and required functions of each part of the Scheme, noting that these change across the Site. The design is well considered and retains the legibility and character of the landscape and reduces the visual effects, where possible, especially for visual receptors, at the edges of settlements, and along routes connecting settlements.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
23	The conclusions in respect of the assessment of landscape and visual effects.	HDC broadly accepts the identification of landscape and visual effects in the LVIA. The development has the potential to transform the local landscape by altering landscape character and, by virtue of the scale of the proposals, would result in significant residual landscape character and visual effects that cannot be fully mitigated. HDC acknowledges that the design is well considered, retains existing landscape features where practicable, and includes extensive mitigation proposals which would reduce visual effects over time. HDC also acknowledges the Applicant's position that the Scheme is temporary and reversible in nature. However, as set out against point 20 above, HDC considers that there is some slight under-representation of significant effects. In particular, HDC considers that the assessment places considerable reliance on mitigation planting to screen views of the development and does not fully account for the adverse effects arising from the loss of openness and the obstruction or truncation of views, particularly for users of Public Rights of Way. HDC also considers that some effects assessed by the Applicant as moderate adverse and non-significant could reasonably be considered significant	The Applicant welcomes HDC's position that they broadly accept the identification of landscape and visual effects in the LVIA. As set out in response BBC-D2-16 of [REP3-073] and Appendix C of [REP4-110], the Applicant maintains that the methodology used for the assessment of impacts and effects is in accordance with published best practice, including the application of professional judgement in determining significance. The Applicant considers that the LVIA appropriately identifies the likely significant effects of the Scheme. The Applicant considers that the Year 10 assessment is robust, and that reliance on mitigation planting is standard practice, with the outline Landscape and Ecological Management Plan [REP3-056] setting out how the planting will be established and managed to ensure the conclusions set out in the LVIA can be relied upon. The Applicant's assessment acknowledges that planting, in some areas, will screen the infrastructure but continue to have adverse (moderate or minor adverse) effects on views. The Applicant's position is that whilst this is judged as an adverse change to a view, the change does not reach the threshold of a significant adverse environmental effect.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		having regard to the Applicant's LVIA methodology. Nevertheless, HDC acknowledges the Applicant's explanation that differences in position principally arise from the exercise of professional judgement in determining significance rather than from a fundamental disagreement regarding the assessment methodology or identification of effects. Whilst HDC maintains the observations set out above, it has no further comments on the conclusions of the LVIA and the matter is agreed.	The Applicant notes HDC's position set out at paragraph 7.17 of their Relevant Representation [RR-494] was that the Scheme: <i>"will leave a positive legacy through the delivery of strengthening and supplementing the landscape character within the Order Limits post operation"</i>.	
Topic: Glint and Glare				
24	The conclusions in respect of the glint and glare assessment	HDC is satisfied that the glint and glare impacts of the Scheme would be acceptable.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Cultural Heritage				
25	The study area and methodology used for the assessment of impacts on the historic environment.	HDC agrees with the study area and methodology used for the heritage assessment. The Technical Note on Warren House [REP4-116] submitted by the Applicant at Deadline 4 is welcomed and satisfies the requirement to assess the impact of the proposed development	The Applicant welcomes agreement on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		on the Grade II* listed Warren House. HDC agrees that the photomontage contained in Appendix A of the Technical Note [REP4-116] provides a robust and reasonable representation of the likely visual relationship between the heritage asset and the Scheme. The Council is satisfied with the approach taken by the Applicant and agrees the methodology used to assess the effects on Warren House.		
26	The baseline data for the historic environment.	HDC is satisfied with the baseline presented for the assessment to the historic environment.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
27	The measures proposed to mitigate impacts on the historic environment.	HDC is satisfied with the mitigation proposed for the historic environment, but defers to CCC with respect to comments on mitigation for archaeology.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
28	The conclusions in respect of the assessment of effects on the historic environment.	HDC is in broad agreement with the conclusions of the assessment of effects on the historic environment. In relation to Warren House, HDC agrees that the photomontage submitted within the Technical Note on Warren House [REP4-116] provides a robust and reasonable representation of the likely visual relationship between the heritage asset and the Scheme. The Council considers	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		that the proposed development would result in an impact on long-distance views from Warren House through the introduction of solar panels into the landscape. Whilst HDC does not agree with the Applicant's characterisation of the Scheme as being "barely perceptible", it agrees that the intervening landform associated with the Kimbolton Castle Estate mitigates the impact. Based on the Technical Note and photomontage provided [REP4-116], HDC is satisfied that the impact on the setting of Warren House would result in less than substantial harm, consistent with the Applicant's assessment.		
Topic: Ecology and Biodiversity				
29	The study areas and methodology used for the assessment of ecological receptors and resources.	HDC agree with the study areas and methodology used for the assessment of ecological receptors and resources.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
30	The baseline data for the assessment of ecological receptors and resources.	HDC considers the survey data relied on for the assessment to be adequate.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
31	The measures proposed to mitigate impacts to	HDC welcomes the proposed ecological mitigation and compensation, with the measures reflected in the oCEMP	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
	ecological receptors and resources.	[REP3-048] and oLEMP [REP3-056] and carried through into the detailed management plans as secured by Requirements 4 and 5 of the draft DCO [REP3-009] any potential significant effects can be appropriately mitigated.		
32	The conclusions in respect of the assessment of impacts and effects to ecological receptors and resources.	HDC agree with the Applicant's assessment in respect of statutory designated sites for nature conservation.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
33	The biodiversity net gain assessment.	HDC is broadly satisfied with the Applicant's approach to BNG, acknowledging that it is not mandatory for this Scheme.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Habitats Regulations Assessment				
34	The Applicant's conclusion that the Scheme will not have adverse effects on the integrity of a European Site.	This matter is agreed. As set out in the Statement of Common Ground (REP1-062) with Natural England, which confirms agreement with the conclusions of the Applicant's Information to Inform a Habitats Regulations Assessment [APP-035].	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
Topic: Flood Risk and Drainage				
35	The Applicant's Flood Risk Assessment.	HDC is satisfied with the Applicant's Flood Risk Assessment insofar as it relates to matters relevant to HDC's statutory functions. HDC defers to CCC as Lead Local Flood Authority and the Environment Agency.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
36	The Scheme meets the requirements of the 'Sequential Test'.	HDC is satisfied that the Scheme meets the requirements of the Sequential Test.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
37	The Scheme meets the requirements of the 'Exception Test'.	HDC is satisfied that the Scheme meets the requirements of the Exception Test.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Noise and Vibration				
38	The conclusions in respect of the assessment of noise and vibration.	HDC agree with the conclusions of the Applicant's assessment of noise and vibration.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
Topic: Air Quality				
39	The conclusions in respect of the assessment of air quality.	HDC agree with the conclusions of the Applicant's assessment of air quality.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Ground Conditions				
40	The conclusions in respect of the assessment of ground conditions.	HDC agree with the conclusions of the Applicant's assessment of ground conditions.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Land Use and Soils				
41	The methodology used for the assessment of impacts and effects on land and soils.	HDC agree with the methodology used for the assessment of impacts and effects on land and soils.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
42	The survey data for the assessment of land and soils.	HDC raised concerns in its relevant representation regarding the adequacy of the survey data for land and soils, and whilst it enables an assessment of the worst-case project effects, it hinders development of a detailed soil management plan. HDC considered the Applicant's oral submission on this matter at Issue Specific Hearing 2 (ISH2) and	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		accept the approach undertaken by the Applicant.		
43	The measures proposed to mitigate impacts on soils.	HDC is satisfied with the Applicant's proposed mitigation measures set out in the outline Soil Management Plan, on the basis that the Applicant has updated the oSMP [REP1-044] to commit to undertaking further detailed soil surveys of the Order limits prior to the construction phase, in order to inform the final Soil Management Plan.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
44	The conclusions in respect of the assessment of land and soils.	HDC consider the overall conclusions broadly meet professional judgement regarding the significance of residual effects. The Council accepts that the applicant recognises that limited positive weight should be afforded to the condition of soils following the operational phase. HDC also notes the Applicant's response to ExQ2.7.1 in the 'Applicant Response to ExA Second Written Questions' [REP4-113] regarding the treatment of woodland, hedgerow and habitat creation within the assessment. HDC maintains that the creation of permanent woody habitat would increase the removal of agricultural land from production (but does not negatively impact soil resources). However, HDC acknowledges the Applicant's explanation regarding the	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		permanence and reversibility of such planting. Whilst there remains a minor difference in professional judgement regarding the categorisation and assessment of these effects, HDC acknowledges that the Applicant has provided further justification for its assessment position.		
Topic: Socio Economics				
45	The conclusions in respect of the assessment of socio-economics.	HDC is satisfied with the assessment of socio-economic effects.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Climate Change				
46	The methodology used for the assessment of climate change impacts and effects.	HDC welcome the approach taken by the Applicant in carrying out the greenhouse gas assessment, and the methodology applied to the Climate Change Risk Assessment (CCRA) and note that it is consistent with guidance issued by ISEP.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
47	The baseline data for the assessment of climate change impacts.	HDC note that an inconsistent use of historic climate data is apparent. The current baseline uses data for Bedford for the period 1991-2020 while the future baseline uses data for the same location from 1981-2010. This inconsistency is	The Applicant acknowledges the noted inconsistency in the presentation of the historic climate data within the Climate Change Risk Assessment (CCRA). Upon review, the Applicant confirms that this inconsistency is an error in reporting. The	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
		unlikely to compromise the overall outcome of the CCRA, but should be addressed.	1991-2020 dataset has been consistently used to calculate both the current and future climate baselines, in line with the methodology and guidance issued by ISEP.	
48	The measures proposed to mitigate climate change impacts.	HDC broadly agree with the measures proposed to mitigate impacts on climate change.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
49	The conclusions in respect of the assessment of climate change impacts and effects.	HDC broadly agree with the conclusions of the climate change assessment.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Human Health				
50	The conclusions in respect of the Scheme's effects on human health.	HDC is satisfied that subject to the required mitigation being secured through the draft DCO, the Scheme does not pose a significant risk to human health insofar as it relates to matters relevant to HDC's statutory functions.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

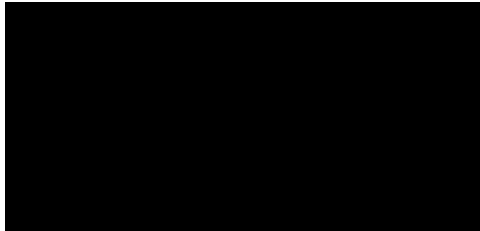
Ref.	Summary of Matter	HDC Position	Applicant Position	Status
Topic: Major Accidents and Disasters				
51	The conclusions in respect of major accidents and disasters.	HDC do not dispute the conclusions in respect of major accidents and disasters, insofar as it relates to matters relevant to HDC's statutory functions.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Electromagnetic Fields				
52	The conclusions in respect of the Scheme's impacts arising from electromagnetic fields.	HDC notes and does not dispute the conclusions in respect of the Scheme's impacts arising from electromagnetic fields.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
Topic: Cumulative Effects				
53	The scope of other developments assessed for potential cumulative effects.	HDC agree with the scope of other developments assessed by the Applicant in its assessment of cumulative effects.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed
54	The conclusions of the assessment of cumulative effects.	HDC agree with the conclusions of the Applicant's assessment of cumulative effects.	The Applicant welcomes agreement with HDC on this matter.	Matter Agreed

Ref.	Summary of Matter	HDC Position	Applicant Position	Status
Topic: Compulsory Acquisition				
55	The land rights sought by the Applicant through the draft DCO insofar as they relate to HDC.	HDC has no objection to the land rights identified in the draft DCO, as these do not relate to any HDC land interests or assets.	The Applicant notes this comment.	Matter Agreed

APPENDIX A

BSSL Cambsbed 1 Ltd

Name:



Signature:

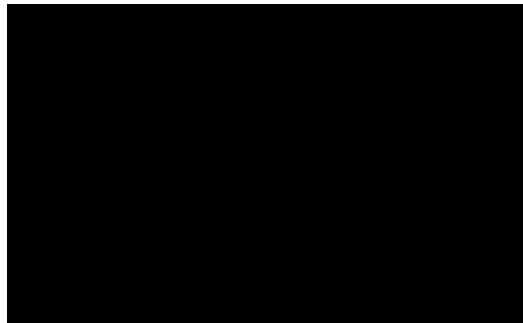
Position: Head of Project Development

On behalf of: BSSL Cambsbed 1 Ltd

Date: 09.09.2026

Huntingdonshire District Council

Name:



Signature:

Position: Head of Planning, Infrastructure and Public
Protection

On behalf of: Huntingdonshire District Council

Date: 11.09.2026
