



BEDFORD BOROUGH COUNCIL

Borough Charter granted in 1166



Chief Executive: Laura Church

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

Email: planning@bedford.gov.uk
Date: 2 April 2026
Ref. EPE 23-02405LPA/2.8 Deadline 1
WR

WRITTEN REPRESENTATIONS

Dear Sir/Madam,

Application by BSSL Cambsbed 1 Limited for an Order Granting Development Consent (DCO) for the East Park Energy Farm (EN010141). Response to Examining Authority to submit a Written Representations

BBC Reference No.: 25/01836/DCO | Examination Ref. [REDACTED]

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

PARTICULARS OF DEVELOPMENT: The 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... generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS [the 'Proposed Development']

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

Case Officers:

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

DELEGATED AUTHORITY

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

Signature: [REDACTED]
[REDACTED]: Head of Planning and Building Control

Date: 2 April 2026

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

1. WRITTEN REPRESENTATION

- 1.1 Bedford Borough Council (the ‘Council’) has reviewed the Applicant’s East Park Energy NSIP DCO Application and supporting material (EN 010141) and have submitted Relevant Representations (14 January 2026) and a Local Impact Report (2 April 2026) to the Examining Authority setting out their position. These Written Representations are submitted in accordance with the Examining Authority’s Timetable (Ref. Rule 6 Letter, Annex D, Item 7 Deadline 1) and set-out the central matters for the Examination.
- 1.2 In the Relevant Representations the Aspect regarding the wording of ‘Scheme description for planning consent’, matters to do with the Highways and PRow powers requested, and the current drafting of the [APP-016] DCO Agreement are viewed as aspects and matters of significant material concern. In preparing the Local Impact Report, the Council’s position has not changed in this regard.
- 1.3 The Council’s Relevant Representations Summary sets out those Aspects and Matters where the Council, subject to matters of clarification requested, can find common ground with the Applicant. However, this is a provisional position subject to review by the Council of the detailed responses prepared by the Applicant to the Council’s Relevant Representations.
- 1.4 In preparing this Local Impact Report, and following the Pre-Examination Hearing (17-18 March 2026), several fundamental and significant issues are tabled by the Council for consideration by the Examining Authority; namely:
- 1.5 **Replacement Phase:** it is noted that there is no comprehensive, stand-alone assessment of impact and potential harm(s) created by the Replacement Phase, which then relates to a separate tier of Management Plans. While the Applicant states that the impact will be no-less than that of the Construction Phase, the very nature of the replacement of infrastructure elements; required haul routes; work force vehicle movements and accommodation; noise and air quality impacts; and, the potential impact on instated hedgerows and culverts is not tabled for review. It is suggested that this requires review and that a Replacement Phase should be reflected appropriately in the DCO and associated Management Plans.
- 1.6 **Construction traffic:** it is suggested that there needs to be clarity as to what is meant by the term ‘construction traffic’ in that this would be vehicle traffic generated across the Construction, Replacement and Decommissioning Phases, rather than construction traffic generated solely within the Construction Phase. The Applicant should clarify that each phase has been assessed and addressed accordingly.
- 1.7 **Enforcement:** there is concern expressed by the Council that the Application relies on strategies and measures as tabled within the Management Plans to mitigate harm while not addressing how the local planning authorities are going to resource the monitoring of these Management Plans over circa 776 hectares over 40-years. Where necessary, the Council has suggested Monitoring Fees should be included, potentially through s106 Agreement(s) with the three Host Authorities.
- 1.8 Currently as presented, the Council considers that the Applicant has not provided sufficient clarity, specificity, and actual commitment (i.e. could vs shall) for the Council to consider that

there are adequate measures contained within the Applicant's control documents to manage and mitigate the effect / harm identified.

- 1.9 **DCO Agreement:** further to the matter above, the Council is not in agreement with the DCO Agreement in-principle as currently tabled, and with the extensive CPO et al as currently requested. In this regard, the Host Authorities has instructed legal representation to review the Agreement to enable a detailed discussion with the Applicant.
- 1.10 **Post-Examination design resolution:** it is noted by the Applicant that, post-Examination, detailed design resolution and approval(s) will be required, in some cases involving the discussion, resolution, and agreement between three Host local planning authorities and statutory consultees (Environment Agency, National Highways) – how this is engaged, concluded, and funded needs address within the Examination.
- 1.11 **Clarity of Matters:** it is suggested that most of the Matters raised in this report require clarity and resolution by the Applicant which can be resolved between Parties.
- 1.12 **Positive impact:** it should be noted that where a Matter has been assessed as potentially having a positive impact, this is subject to a commitment / strategy put in place by the Applicant / landowner post the Decommissioning Phase that retains the mitigation and enhancement measures as put in place in perpetuity - the Council's position is consequently a caveated statement.
- 1.13 **Planning benefits:** it is suggested that the planning benefits of the Application cannot be ascertained until such time as the Applicant clarifies the very nature of 'temporary' and what elements instated by the Proposed Development will be retained by the landowners post the Decommissioning Phase. It is suggested that the habitats created, the Skylark grasslands, and permissive routes if adopted as PRoW, could form a significant ecological and human wellbeing element of the Proposed Development creating a lasting, permanent legacy.

To aid reading across the Council's various submitted reports, the Council attach their working Schedule which highlights which Matters could be reviewed as a) concluded / in agreement (subject to); b) those matters which Parties are not in agreement; and c) those matters which with clarification and understanding of long-term / permanent commitment could form very positive elements of the Proposed Development. It should be accepted that this remains a working document subject to the Applicant reviewing and commenting on the Council's reports to date. As tabled, the Schedule should be reviewed as 'For Information' only.

In conclusion, the Council remains open to continued discussions with the Applicant, the other Host Authorities, and the Examining Authority during the Examination period to review, clarify, and resolve the Matters as raised in the Relevant Representation report and assessed in the Local Impact Report.

Should Parties require any clarification, please contact the Council's Lead Case Officer.

PD.QA/3pg