EAST PARK ENERGY

East Park Energy

EN010141

Environmental Statement
Volume 1 – Main Report

Chapter 1: Introduction

Document Reference: EN010141/DR/6.1

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

September 2025

Version P01

EAST PARK ENERGY

Planning Act 2008

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

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Chapter 1: Introduction

APFP Regulation Reference:	Regulation 5(2)(a)
Planning Inspectorate Scheme Reference:	EN010141
Application Document Number:	EN010141/DR/6.1
Author:	Axis PED Ltd

Version	Date	Status
P01	September 2025	DCO Submission

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1.0 INTRODUCTION

1.1 Background

1.1.1 BSSL Cambsbed 1 Limited (the 'Applicant') has prepared this **Environmental Statement** (ES) **[EN010141/DR/6.1 / 6.2 / 6.3]** in relation to an application for a Development Consent Order ('DCO') for the East Park Energy project (the 'Scheme'). The application for development consent will be submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for the Department for Energy Security and Net Zero (hereafter referred to as the 'Secretary of State') pursuant to the Planning Act 2008[1].

1.1.2 The Scheme is 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations')[2], requiring an Environmental Impact Assessment ('EIA'). This ES presents the findings of the EIA undertaken for the Scheme in accordance with the EIA Regulations and the Planning Act 2008.

1.1.3 A Preliminary Environmental Information Report (PEIR) for the Scheme was published on 24th September 2024 in accordance with Regulations 12 and 13 of the EIA Regulations. The PEIR, which was written in the form of a draft ES, provided the community and consultees with an assessment of the likely significant effects of the Scheme, defining the scope, methodology and limitations of the assessments used to inform the EIA.

1.1.4 This chapter is supported by the following figures (see **ES Volume 3: Figures [EN010141/DR/6.3]**:

- **ES Vol 3 Figure 1-1: Site Location Plan [EN010141/DR/6.3]**;
- **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**; and
- **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

1.1.5 The contents, glossary and list of acronyms for the ES are provided in **ES Volume 1 Chapter 0: Table of Contents, Glossary and Acronyms [EN010141/DR/6.1]**.

The Applicant

1.1.6 The Applicant, BSSL Cambsbed 1 Ltd is a wholly owned subsidiary of Brockwell Energy. Brockwell Energy is a leading multi-technology independent power producer, specialising in renewable energy infrastructure. Since 2017, Brockwell Energy has originated and built-out more than £1bn of assets in the UK, and have a pipeline of more than 3.5 GW across onshore wind, solar energy, and battery storage currently in development.

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 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant presently has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

1.2.3 Subject to the Scheme securing Development Consent in Winter 2026/27 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.

1.2.4 A more detailed description of the Scheme is provided within **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.

1.3 Site Description

Order Limits

1.3.1 The area of land required for the construction, operation and maintenance of the Scheme, which includes land required for permanent and temporary purposes, is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. This is referred to as the 'Order Limits' or the 'Site'.

The Site

1.3.2 The 'Site' 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 location is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. The Site area extends to approximately 773 hectares (ha).

1.3.3 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, 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. East Park Sites A to D can be described as follows:

- **East Park Site A** – covering land west of the B660 between Pertenhall and Swineshead at the western end of the Site. East Park Site A comprises arable fields located to the north, west and east side of a small hill that lies between Pertenhall and Riseley. East Park Site A lies either

side of the Pertenhall Brook, with access proposed from the B660 to the east.

- **East Park Site B** – covering land between Pertenhall, Keysoe, and Little Staughton. East Park Site B comprises arable fields located north of an elevated ridgeline which runs between Keysoe and Little Staughton. East Park Site B is crossed by a number of small watercourses, with access proposed from the B660, Great Staughton Road, Little Staughton Road, and an unnamed road between Little Staughton and Great Staughton Road.
- **East Park Site C** – covering land south of Great Staughton. East Park Site C comprises arable fields located south of the River Kym, with access proposed from Moor Road to its south-eastern boundary, and from Little Staughton Road to the north-west.
- **East Park Site D** – covering land around Pastures Farm between Great Staughton and Hail Weston. East Park Site D comprises arable fields with access proposed via a new access from the B645.

1.3.4 With reference to **ES Vol 3 Figure 1-2: Site References [EN010141/DR/6.3]**, there are three linear corridors proposed for underground cabling that connect the different parts of the Site and provide a grid connection to the Eaton Socon Substation. These are also shown on **Figure 1-2** and identified as:

- **Cable Corridor – Site B to Site C** – which connects Site B to Site C across an unnamed road and arable fields.
- **Cable Corridor – Site C to Site D** – which connects Site C to Site D across Moor Road and an arable field.
- **Grid Connection** – Site D to Eaton Socon Substation – which connects Site D to the Eaton Socon Substation and crosses open arable fields, the Duloe Brook, and Duloe Road and Bushmead Road.

Site Context

Local Context

1.3.5 The Site is located on the south side of a broad shallow clay vale landform formed by a number of west-east tributaries to the River Great Ouse, which flows north-south to the east of the Site through the town of St Neots approximately 3.7km east of Site D.

1.3.6 The local landscape is generally more undulating than the Site which is located predominantly in a low-lying area with relatively limited topographic variation. The landform rises to the north of the Site towards Grafham Water, to the west of the Site towards a ridgeline beyond Swineshead, and to the south of the Site towards a high point around the Bedford Aerodrome.

1.3.7 The landscape pattern of the local area is broadly consistent, comprising medium- to large-scale arable farmland interspersed with blocks of woodland, particularly in the more elevated parts of the landscape to the north of the Site.

1.3.8 The local settlement pattern is dispersed and typically rural in character comprising occasional distinct village settlements. From west to east the principal settlements in closest proximity to the Site are Swineshead, Pertenhall, Keysoe, Keysoe Row, Little Staughton, Great Staughton, Hail Weston, and Duloe. The town of St Neots lies east of the A1 to the east of the Site and is the largest settlement local to the Site. Outside of the settlements there are occasional individual properties and farmsteads including some in close proximity to the Site. The following properties lie ‘inset’ within the Order Limits, in that they are excluded from the Order Limits but surrounded by the Site:

- Lodge Farm, a residential property with associated equestrian land uses inset within Site B to the north-west of Little Staughton; and

- The Kangaroo, a former public house which is now a residential property and dog kennels inset within Site B at the junction between Little Staughton Road and Staughton Road.

1.3.9 There are several existing solar farms in close proximity to the Site, which are located:

- To the south of Pertenhall (adjacent to East Park Site A);
- At Little Staughton Airfield (1.2km south-west of East Park Site C); and
- At High Wood to the west of Hail Weston (0.1km south of East Park Site D).

1.3.10 The local area is crossed by a network of public rights of way including footpaths, bridleways and byways open to all traffic. There are three long distance recreational trails within 3km of the Site, albeit none of which cross into the Site: the North Bedfordshire Heritage Trail which passes through Riseley and Keysoe Row; the Three Shires Way north of Great Staughton that provides a circular route around Grafham Water; and the Ouse Valley Way which follows the River Great Ouse through St Neots. There are occasional small areas of public space located around villages and the largest area of accessible natural green space is Swineshead Wood open access land which is located to the north of Swineshead.

Designations

1.3.11 Relevant environmental designations in the vicinity of the Site are shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

1.3.12 Neither the Order Limits nor the surrounding area are covered by any statutory landscape designations, e.g. National Parks or National Landscapes. The closest statutory landscape designation to the Scheme Boundary is the Chilterns National Landscape located approximately 30 km to the south. The Order Limits are also not within any locally designated (non-statutory) landscapes.

1.3.13 There are no statutory nature conservation designations within the Order Limits. The closest is the Swineshead Wood Site of Special Scientific Interest (SSSI) located circa 950 m west of the Site, recognised for its structural and biological diversity associated with ancient woodland. Perry Woods SSSI is located circa 1.8 km north of the Order Limits and Grafham Water SSSI is located circa 2.8 km north. The closest 'European site' (Upper Nene Valley Gravel Pits Special Protection Area) is over 10 km from the Order Limits, to the north-west. Further detail on nature conservation designations is set out within **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]**.

1.3.14 The following non-statutory nature conservation designations are adjacent to the Site:

- Kangaroo Meadow County Wildlife Site, which is adjacent to Site B and is recognised for the presence of neutral grassland; and
- Huntingdon Wood County Wildlife Site, which is adjacent to the south side of the grid connection between Site D and the Eaton Socon Substation.

1.3.15 At the time of EIA Scoping and during the site selection process there were no statutory designated heritage assets within the Site, however archaeological investigation undertaken as part of the environmental assessment of the Scheme has discovered the site of a Roman Town in Site C. Due to the national importance of the archaeological finding, the Applicant has been engaging with Historic England on the find since it was identified in January 2024. Recognising the potential significance of the archaeology, and seeking to protect it in the future, the Applicant made a decision to apply to the Secretary of State for Culture, Media and Sport (via Historic England) to designate the area as a Scheduled Monument. The application was accepted and the archaeology was designated as a scheduled monument in September 2024. The location of this Scheduled Monument is shown on **ES Vol 3 Figure 1-3: Environmental Constraints [EN010141/DR/6.3]**.

1.3.16 There are no other statutory designated heritage assets within the Order Limits. There are a number of listed buildings located within the vicinity of the Order Limits, in and around the settlements of Pertenhall, Keysoe, Swineshead, Little Staughton, Great Staughton and Duloe. Of particular note this includes the Grade I listed Church of St Peter in Pertenhall; the Grade I listed Church of St Mary the Virgin in Keysoe; the Grade I listed Church of All Saints to the east of Little Staughton; and the Grade I listed Church of St Andrew at Great Staughton. There is one scheduled monument adjacent to the southern boundary of East Park Site C (two bowl barrows, 900 m and 1,000 m east of Old Manor Farm). A Roman Site, Rushey Farm Scheduled Monument is located circa 130 m south of the East Park Site C boundary, and 'Old Manor House' Scheduled Monument is located circa 770 m west of the East Park Site C boundary.

1.3.17 The Order Limits are not covered by any conservation areas, with the closest being the Great Staughton Conservation Area, located circa 200 m north of East Park Site C; Swineshead Conservation Area, located circa 750 m west of East Park Site A; and Riseley Conservation Area, located circa 1.2 km south-west of East Park Site A.

1.3.18 The Order Limits are located predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 associated with Pertenhall Brook to the west through Site A; with an unnamed watercourse through Site B; and with the River Kym to the north of Site C.

1.3.19 The Order Limits are crossed by a number of existing utilities including high pressure gas mains and overhead electricity lines, the required easements of which would be excluded from the solar development area. Cabling across these areas would be in accordance with all required standards.

1.4 Structure of the ES

1.4.1 The structure of the ES is set out within Table 1.1 below.

Table 1.1 ES Structure

Volume	Chapter	Description
Volume 1	Chapter 1: Introduction Chapter 2: The Scheme Chapter 3: Alternatives and Design Evolution Chapter 4: Environmental Impact Assessment Methodology Chapter 5: Landscape and Visual Chapter 6: Cultural Heritage and Archaeology Chapter 7: Ecology and Nature Conservation Chapter 8: Flood Risk, Drainage and Surface Water Chapter 9: Traffic and Transport Chapter 10: Noise and Vibration Chapter 11: Air Quality Chapter 12: Ground Conditions Chapter 13: Land and Soils Chapter 14: Socio-Economics, Land Use and Tourism Chapter 15: Climate Change Chapter 16: Other Environmental Topics	The ES considers the environmental effects associated with a number of identified topics, which may result in significant environmental effects. Each topic is presented in a separate technical chapter and details the results of the environmental assessment, the potential likely significant effects arising from the Scheme, and the proposed mitigation measures. Each chapter also presents the potential cumulative effects resulting from other past, present or reasonably foreseeable projects together (i.e. cumulatively) with the Scheme. The chapters correspond to the topics which were determined to have the potential to result in likely significant environmental effects as a result of the EIA scoping process undertaken by the Applicant and which was the subject of a Scoping Opinion from the Planning Inspectorate on the 8th December 2023. Chapter 16: Other Environmental Topics includes consideration of human health, waste, major accidents or disasters, and electromagnetic fields.
	Chapter 17: Cumulative and In-Combination Effects	An assessment of likely significant cumulative and intra-project effects.
	Chapter 18: Summary of Effects	A brief summary of the residual significant effects remaining following the implementation of mitigation.
Volume 2	Technical Appendices	A set of appendices is provided for reference. These comprise background data, technical reports, tables, figures and

Volume	Chapter	Description
		surveys which support the assessments in this ES.
Volume 3	Figures	A set of figures is provided to accompany ES Volume 1 to aid the readers understanding.
Volume 4	Non-Technical Summary (NTS)	The NTS is presented in a separate document to provide a concise description of the Scheme, the considered alternatives, baseline, assessment methodology, potential environmental effects and mitigation measures. The NTS is designed to provide information on the Scheme in an accessible format using non-technical language which can be understood by a wide audience and to assist interested parties with their familiarisation of the Scheme.

1.5 Competent Experts

1.5.1 Regulation 14(4)(a) of the EIA Regulations requires that the ES is prepared by 'competent experts'. The EIA has been managed and coordinated by Axis PED Ltd (Axis) on behalf of the Applicant. Axis is a specialist planning and environmental consultancy employing 18 chartered members of the Royal Town Planning Institute and has been preparing and coordinating Environmental Impact Assessments as part of its core business for 25 years.

1.5.2 ES Chapters 1 to 4, 16, 17 and 18 and the NTS have been prepared by Axis. The engineering design inputs have been provided by Brockwell Energy, Ignis, IPS Power, and AECOM, all of which are experienced engineering, solar and BESS designers.

1.5.3 The topic chapters (Chapters 5 -15), and other supporting assessments, have been prepared by a number of expert consultants. Each topic chapter provides a summary of the author's experience in their topic area.

1.5.4 The companies responsible for preparing the chapters of the ES, and the other supporting assessments, are summarised in Table 1.2 below.

Table 1.2 Competent Experts

ES Chapter / Supporting Assessment	Author
Chapter 1: Introduction	Axis
Chapter 2: The Scheme	Axis
Chapter 3: Alternatives and Design Evolution	Axis
Chapter 4: Environmental Impact Assessment Methodology	Axis
Chapter 5: Landscape and Visual	Axis
Chapter 6: Cultural Heritage and Archaeology	AOC Archaeology
Chapter 7: Ecology and Nature Conservation	Avian Ecology
Chapter 8: Flood Risk, Drainage and Surface Water	Wallingford Hydro Solutions
Chapter 9: Traffic and Transport	Axis
Chapter 10: Noise and Vibration	Noise and Vibration Consultants (NVC)
Chapter 11: Air Quality	Smith Grant LLP
Chapter 12: Ground Conditions	Smith Grant LLP
Chapter 13: Land and Soils	Reading Agricultural Consultants
Chapter 14: Socio-Economics, Land Use and Tourism	Amion Consulting
Chapter 15: Climate Change	Fichtner Consulting Engineers

ES Chapter / Supporting Assessment	Author
Chapter 16: Other Environmental Topics	Axis
Chapter 17: Cumulative and In-Combination Effects	Axis
Chapter 18: Summary of Effects	Axis
Non Technical Summary	Axis
Appendix 2-2: Arboricultural Impact Assessment	Cura Terrae
Appendix 5-7: Glint and Glare Assessment	Neo Environmental

1.6 Legislative and Planning Policy Context

Consenting Process

1.6.1 The Scheme is defined as a Nationally Significant Infrastructure Project ('NSIP') under Sections 14(1)(a) and 15(2) of the Planning Act 2008 as an onshore generating station in England exceeding 50 megawatts (MW).

1.6.2 The Planning Act 2008 provides that the Secretary of State is responsible for determining the application for development consent, with the power to appoint the Planning Inspectorate to manage and examine the application. In its role, the Planning Inspectorate will examine the application for the Scheme and make a recommendation to the Secretary of State who will then decide whether to grant a DCO.

1.6.3 In accordance with Section 104(2) of the Planning Act 2008, the Secretary of State is required to have regard to the relevant national policy statements ('NPS'), amongst other matters, when deciding whether or not to grant a DCO. Solar photovoltaic (PV) generation is covered within the NPS for Renewable Energy Infrastructure (EN-3)[3], with energy storage recognised as associated infrastructure.

1.6.4 Other NPS's of relevance to the Scheme comprise:

- Overarching National Policy Statement for Energy (EN-1)[4]; and
- National Policy Statement for Electricity Networks Infrastructure (EN-5)[5], in respect of the grid connection.

1.6.5 In accordance with Section 104(2)(d), the Secretary of State must also consider any other matters which they consider important and relevant, including national and local planning policy. For example, the National Planning Policy Framework (NPPF)[6] published in December 2024 is considered relevant national planning policy, as are development plans Bedford Borough Council, Huntingdonshire District Council and Cambridgeshire County Council.

1.6.6 A DCO, if granted, has the effect of providing consent for development, in addition to a range of other consents and authorisations, where specified, as well as removing the need for some consents (such as planning permission). Section 115 of the Planning Act 2008 also states that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right, but is associated with the NSIP applied for. This may be development that supports the construction, operation or decommissioning of the NSIP; which helps to address the impacts of the NSIP; or is of a type normally brought forward with the NSIP.

EIA Regulations

1.6.7 The EIA Regulations specify which developments are required to undergo EIA and schemes relevant to the NSIP planning process are listed under either of 'Schedule 1' or 'Schedule 2'. Those developments listed in Schedule 1 must be subject to EIA, while developments listed in 'Schedule 2' must only be subjected to EIA if they are considered *"likely to have significant effects on the environment by virtue of factors such as its nature, size or location".* The criteria on which this judgement must be made are set out in Schedule 3. The Scheme is a 'Schedule 2' development under Paragraph 3(a) of Schedule 2

of the EIA Regulations as it constitutes 'Industrial installations for the production of electricity, steam and hot water'.

1.6.8 The Applicant has confirmed to the Planning Inspectorate under Regulation 8(1)(b) of the EIA Regulations that an ES will be provided with the DCO application for the Scheme (as required by Regulation 5(2)(a) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('APFP Regulations')[7]), as it is considered there is the potential for the Scheme to meet the criteria set out in Schedule 3 of the EIA Regulations.

1.6.9 The issues that the Applicant considers the EIA will need to address were identified in the EIA Scoping Report submitted to the Planning Inspectorate on 30th October 2023 (see **ES Vol 2 Appendix 4-1: East Park Energy EIA Scoping Report [EN010141/DR/6.2]**. The EIA Scoping Report was developed following initial consultation with a number of statutory consultees and was informed by the EIA team's experience working on a number of other solar farm projects. The Planning Inspectorate reviewed and consulted on the EIA Scoping Report and published a Scoping Opinion on 8th December 2023 (the 'Scoping Opinion') which included the formal responses received by the Planning Inspectorate from consultees (see **ES Vol 2 Appendix 4-2: EIA Scoping Opinion [EN010141/DR/6.2]**. Key issues raised in the Scoping Opinion are summarised in each technical chapter of the PEIR. All issues raised during that scoping process are being considered during the EIA process.

National Policy Statements

1.6.10 The DCO will be determined in accordance with the Overarching NPS for Energy (EN-1), designated January 2024, and the NPS for Renewable Energy Infrastructure (EN-3), also designated January 2024, which covers solar PV generation, with energy storage recognised as associated infrastructure. The EIA also takes account of the NPS for Electricity Networks Infrastructure (EN-5), which is also considered to be important and relevant

to the Secretary of State's decision as to whether to grant a DCO for the Scheme in light of the proposed grid connection.

1.6.11 The Department for Energy Security and Net Zero published draft updates to NPS EN-1, EN-3 and EN-5 on the 24th April 2025. One of the most substantial changes relates to the integration of the Clean Power 2030 Action Plan into the NPSs. In this regard, the draft update highlights the essential role that renewable energy NSIPs have in achieving the target of producing at least 95% of Great Britain's generation from clean sources of power by 2030. In relation to solar energy the draft updates do not contain any material changes which affect the approach to the environmental assessments presented in this ES. As such the topic chapters only consider the currently designated NPSs.

National Planning Policy Framework

1.6.12 The NPPF sets out the Government's planning policies for England and how these are to be applied. It is a material consideration in planning decisions. Paragraph 5 of the NPPF makes it clear that the document does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs, as well as any other matters that are considered both important and relevant. However, Paragraph 5 goes on to confirm that the NPPF may be a matter that is both important and relevant for the purposes of assessing DCO applications. The EIA for the Scheme therefore has regard to the relevant policies of the NPPF as part of the overall framework of national policy.

Local Planning Policy

1.6.13 Policies in local plans are frequently considered 'important' and 'relevant' matters and can influence the content of local impact reports (which the host local authorities will produce following submission of the application for development consent) which the Secretary of State must have regard to in its decision making in accordance with Section 105(2) of the Planning Act 2008.

1.6.14 The Scheme lies within the administrative area of Bedford Borough Council (BBC) (a Unitary Authority), and Huntingdonshire District Council (HDC) which is a two-tier council area with Cambridgeshire County Council (CCC).

1.6.15 The local planning policy relevant to the Scheme consists of the following:

- Huntingdonshire Local Plan to 2036[8];
- Cambridgeshire and Peterborough Minerals and Waste Local Plan[9].
- Bedford Borough Local Plan 2030[10];
- Bedford Allocations and Designations Local Plan[11];
- Saved Policies of the Bedford Borough Council Local Plan 2002[12];
- Bedford Borough, Central Bedfordshire and Luton Borough Councils Minerals and Waste Local Plan: Strategic Sites and Policies[13]; and
- Great Staughton Neighbourhood Plan 2021 to 2036[14].

1.6.16 The emerging Bedford Borough Local Plan 2040 began the examination phase in February 2023 but was paused in March 2024. The Inspector examining the Plan wrote to Bedford Borough Council in June 2025 raising significant concerns about the Plan, and strongly recommending the Council withdraw the Plan from examination, otherwise a report would be prepared to find the Plan unsound[15]. The Council has put forward a motion to consider the withdrawal of the Plan at a Council meeting on 8th October[16]. As such, and noting the Examiner's position that if the Plan is not withdrawn it would be found unsound, the policies of the Plan have not been considered within this ES. The emerging allocations that were put forward as part of the Plan were considered as part of the identification of cumulative schemes, as set out in Section 4.5 of **ES Vol 1 Chapter 4: EIA Methodology [EN0101041/DR/6.1]**.

Consideration of Planning Policy in EIA

1.6.17 The ES describes the national and local planning policies relevant to the assessment and the development of mitigation with a summary provided for each environmental topic. The ES does not assess the Scheme against planning policy, which will be undertaken and set out in the Planning

Statement. The Planning Statement will be a separate document that will be submitted as part of the DCO application.

1.6.18 The purpose of considering the planning policy in the EIA is twofold:

a. To identify policy that could influence the sensitivity of receptors (and therefore the significance of effects) and any requirements for mitigation; and
b. To identify planning policy that could influence the methodology of the EIA. For example, a planning policy may require the assessment of an impact or the use of a particular methodology.

1.6.19 A summary of national and local planning policy relevant to each technical assessment is provided within the relevant chapters for each environmental topic.

1.7 Consultation

1.7.1 Consultation is integral to the preparation of DCO applications and to the EIA process. The views of consultation bodies and the local community serve to focus the environmental studies and to identify specific issues that require further investigation, as well as to inform aspects of the design of the Scheme. Consultation is a continuous process, and the feedback received by the Applicant from the two rounds of community consultations conducted for the project, along with input from statutory consultees and other interested parties, has played a vital role in the EIA process.

1.7.2 The Planning Act 2008[1] requires applicants for DCOs to carry out formal (statutory) pre-application consultation on their proposals. There are several requirements as to how this consultation must be undertaken that are set out in the Planning Act 2008 and related regulations:

- Section 42 requires the applicant to consult with 'prescribed persons', which includes certain consultation bodies such as the Environment Agency, Historic England and Natural England, relevant statutory

undertakers, relevant local authorities, those with an interest in the land, as well as those who may be affected by the Scheme;

- Section 47 requires the applicant to consult with the local community on the development. Prior to this, the applicant must agree a Statement of Community Consultation (SoCC) with the relevant local planning authorities. In the case of the Scheme, the Applicant has done this with Bedford Borough Council, Huntingdonshire District Council, and Cambridgeshire County Council. The SoCC must set out the proposed community consultation and, once agreed with the relevant local authorities, a SoCC Notice must be published in local newspapers circulating within the vicinity of the land in question. The consultation must then be carried out in accordance with the final SoCC;
- Section 48 places a duty on the applicant to publicise the proposed application in the 'prescribed manner' in a national newspaper, The London Gazette, local newspapers circulating within the vicinity of the land and, where relevant, certain marine publications; and
- Section 49 places a duty on the applicant to take account of any relevant responses received to the consultation and publicity that is required by Sections 42, 47 and 48.

1.7.3 The Applicant adopted a two-stage approach to pre-application consultation on the Scheme. Phase 1 comprised an informal, non-statutory consultation during October and November 2023. Phase 2 consultation comprised a formal statutory consultation during September 2024 and October 2024. The aforementioned requirements were met and the PEIR was made available for review and comment during the consultation period.

1.7.4 The issues that have been raised through consultation, and how these have been considered and addressed within the design evolution of the Scheme and the EIA, are set out in the ES. Each chapter contains a summary of comments relevant to that chapter received from the consultees prescribed under Section 42 of the Planning Act 2008. A description of how these have been considered is provided.

1.7.5 The pre-application consultation undertaken by the Applicant is documented within the **Consultation Report [EN010141/DR/5.1]**. This includes a separate section on EIA related consultation, as recommended within the Planning Inspectorate's Advice on the Consultation Report[17] on the preparation of consultation reports.

1.8 Purpose of the ES

1.8.1 Regulation 14 of the EIA Regulations requires that an application for an order granting development consent for EIA development must be accompanied by an environmental statement. Regulation 14 and Schedule 4 of the EIA Regulations set out the information that must be provided within the ES.

1.8.2 Table 1.3 summarises where the requirements of Schedule 4 of the EIA Regulations have been addressed in the ES.

Table 1.3 Requirements of Schedule 4 of the EIA Regulations

Paragraph	Requirement	Where Addressed Within the ES
1	A description of the development, including in particular: (a) a description of the location of the development; (b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases; (c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.	(a) Section 1.3. (b & c) **Chapter 2**. (d) Within **Chapter 2** as it relates to the scheme description and within **Chapters 5 to 16** as it relates to individual topic areas.
2	A description of the reasonable alternatives (for example in terms of development design,	**Chapter 3**.

Paragraph	Requirement	Where Addressed Within the ES
	technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	
3	A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	The baseline is fully described / established within **Chapters 5 to 16** as it relates to individual topic areas.
4	A description of the factors specified in regulation 5(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	The baseline factors that have potential to be affected by the Scheme are fully described / established within **Chapters 5 to 16** as they relate to individual topic areas.
5	A description of the likely significant effects of the development on the environment resulting from, inter alia: (a) the construction and existence of the development, including, where relevant, demolition works; (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources; (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);	All within **Chapters 5 to 16** as it relates to individual topic areas.

Paragraph	Requirement	Where Addressed Within the ES
	(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources; (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union level (as they had effect immediately before exit day) or United Kingdom level which are relevant to the project, including in particular those established under the law of any part of the United Kingdom that implemented Council Directive 92/43/EEC and Directive 2009/147/EC	
6	A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	The overall EIA methodology and approach to assessment is described in **Chapter 4**. The specific technical methodologies used to identify and assess effects are fully described (or referenced) within **Chapters 5 to 16** as they relate to individual topic areas. Certain methodologies are specifically contained within the Technical Appendices to in **Chapters 5 to 16**.
7	A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on	'Embedded Mitigation' is included within the detailed scheme

Paragraph	Requirement	Where Addressed Within the ES
	the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	description within **Chapter 2**. Embedded and additional mitigation measures as they apply to individual environmental topic areas, are fully described (or referenced) within **Chapters 5 to 16** as they relate to each topic.
8	A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to assimilated law such as any law that implemented Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the requirements of any law that implemented this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	**Chapter 16**.
9	A non-technical summary of the information provided under paragraphs 1 to 8.	A separate NTS is contained as **Volume 4**.
10	A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	References are provided as endnotes at the end of each Chapter, as appropriate.

1.8.3 In relation to Regulation 14(3) and (4) of the EIA Regulations the ES is:

- based on the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion);

- includes the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment;
- has been prepared, taking into account the results of any relevant UK environmental assessment, which is reasonably available to the applicant with a view to avoiding duplication of assessment; and
- has been prepared by competent experts as set out within each chapter of the ES.

1.9 References

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