

2 April 2026

██████████  
Bedford Borough Council  
Borough Hall  
Cauldwell Street  
Bedford MK42 9AP

Dear Mr ██████████

**East Park Energy DCO Examination (EN010141)**

Stop East Park Energy (SEPE) is an independent, community-led group representing more than 1,000 residents, landowners and stakeholders across the affected area. SEPE operates on an entirely unfunded basis. We are writing to provide Bedford Borough Council with a copy of SEPE's Written Representation (WR) and to identify those sections of it that may be of assistance in relation to the matters identified by the Examining Authority for inclusion in any Statement of Common Ground between the Applicant and Bedford Borough Council.

The WR is a structured document with numbered topic sections, a legal appendix, a cross-reference appendix and a consolidated procedural-deficiency table intended to assist navigation and traceability. We have today submitted the Written Representation to the Planning Inspectorate; however, it will not enter the public domain until the Examining Authority authorises publication of Deadline 1 submissions. The document should therefore be treated as confidential and embargoed until that time.

We understand that the relevant local authorities are working collaboratively in relation to this development, and for completeness we have also shared this document with Huntingdonshire District Council and Cambridgeshire County Council. We would be grateful if it could be handled on a restricted basis within the authorities' officer teams and not circulated more widely pending formal publication.

We appreciate the detailed work already undertaken by the Council. This letter is provided in a constructive spirit to help signpost parts of the WR that may assist officers in reviewing the application, preparing the Local Impact Report and considering areas where further clarification, evidence or drafting changes may be required.

## **1. Principle of Development**

The principal sections of the WR relevant to the principle of development are Section 4.0 (Planning and Policy context), Section 5.0 (Agricultural land quality and food production), Section 10.0 (Site selection and spatial alternatives), Section 20.0 (Draft Development Consent Order) and Section 21.0 (Planning balance). These sections address the case advanced by SEPE that the proposal has not demonstrated a sufficiently transparent sequential alternatives assessment, particularly in relation to the use of BMV land, grid-interface assumptions and the relationship with Bedford Borough Local Plan policy.

If the Council wishes to review this topic through the lens of the procedural-deficiency schedule, the most relevant signposts are Appendix M together with the alternatives and BMV-related deficiencies identified in the WR, including Procedural Deficiency #4A (integrated grid and site alternatives), #4B (topography / solar-resource assessment), and the agricultural land and food-production deficiencies addressed through Section 5.0. The WR also links these issues to the overall adequacy of the environmental information in Section 21.0.

## **2. Economic and Social Effects, including Local Plan strategy**

The most relevant WR sections are Section 9.0 (Socio-Economic and Community Impacts), Section 5.0 on agricultural productivity and food production, and Section 21.5 on community amenity impacts within the planning balance. These sections address rural employment, farming continuity, food-system resilience, residential amenity, community wellbeing and the absence of a dedicated, quantified socio-economic assessment.

The WR identifies this as engaging Procedural Deficiency #9A (absence of a quantified socio-economic impact assessment, including agricultural economic displacement) and #9B (absence of assessment of amenity-related market-stigma / population and human-health effects). These may be of assistance if the Council is considering whether the applicant's socio-economic case is sufficiently evidenced and whether local effects have been properly characterised.

## **3. Construction Traffic**

The core traffic material is in Section 13.0 (Construction traffic and routing impacts), supported by Section 14.0 (Construction environmental management and mitigation), especially where traffic, routing and environmental management overlap. Of particular relevance are passages in Section 13.0 which address the B645 / A1-B645 junction, overspill risks through Bedfordshire villages, construction-traffic assumptions, peak-period effects, ALL movements and the need for enforceable routing controls.

The WR also relies on comparator and cumulative material relevant to local impacts, including the Cleve Hill comparator evidence and cumulative development context in Appendix I, and the discussion of enforceable routing, GPS monitoring and sanctions. Those passages may be of use where the Council is considering whether stronger DCO-level controls are required.

#### **4. Environmental Impact Assessment, including cumulative effects**

The sections most relevant to the adequacy of the EIA are Section 4.8 (Review of Applicant's EIA Methodology), Section 4.9 (Non-Technical Summary), Section 4.10 (Summary of policy and legal conflict), Section 19.0 (Cumulative effects with neighbouring solar, BESS and NSIP projects) and Section 21.8 (Adequacy of environmental information and decision-stage confidence). These sections set out SEPE's case that the environmental information is incomplete in several material respects and that cumulative assessment, methodology and deferred mitigation require closer scrutiny.

The WR's overarching position on this issue is summarised in the Executive Summary and revisited in Section 21.8, where the cumulative deficiencies are said to engage the decision-stage adequacy test under the EIA Regulations and EN-1. The relevant consolidated signpost is Procedural Deficiency #21B – Cumulative Procedural Deficiencies – Incomplete Environmental Information, supported by Appendix M, Appendix L and the cumulative-development material in Appendix I.

#### **5. Landscape and Visual Effects, including lighting**

The principal sections are Section 8.0 (Landscape and Rural Character), Section 17.0 (Public Rights of Way, Recreational Amenity and Community Access) and Section 14.7 (Construction and operation lighting: assessment and controls). These passages address the adequacy of the LVIA, visual evidence, mitigation assumptions, rural character, receptor proximity and the relationship between landscape effects and PRow amenity.

The most relevant procedural cross-references are Procedural Deficiency #8A (LVIA), #8C (population / receptor assessment) and #8D (landscape mitigation assumptions), all of which are tied back to Appendix M. The WR also uses Appendix G (Manor Farm Solar Development Case Study) and Appendix R (Proximity of the Proposed Development to residential and designated Heritage receptors) to support its critique of mitigation and receptor effects.

#### **6. Other potential effects: heritage assets, biodiversity, noise and vibration, air quality, emissions, contamination and emergency planning**

For heritage, the relevant material is in Section 12.0 (Cultural heritage and archaeology) and also Section 8.0, which deals with Grade I heritage receptors and setting effects. These sections may be of direct use in relation to heritage setting, archaeology and the adequacy of safeguards. The corresponding procedural signpost is #8B in Appendix M.

For biodiversity, the key section is Section 11.0 (Ecology and Biodiversity), supported by Appendix P (Biodiversity Net Gain deficiency table). These passages address baseline gaps, farmland birds, hedgerows, BNG securing and HRA issues.

For noise and vibration, the relevant section is Section 16.0, supported where necessary by the BESS-specific material in Section 15.0.

Further relevant material is spread across Sections 6.0, 14.0, and 18.0 (Lifecycle carbon, recycling obligations and decommissioning funding), together with Section

15.0 (Battery energy storage system safety and environmental risk). These passages address soil and groundwater contamination risks, construction and operational emissions, lifecycle carbon transparency, recycling assumptions, replacement impacts and decommissioning funding/security, as well as BESS-specific issues including emergency response capacity, thermal-runaway scenarios, fire-water contamination, EMF and tonal noise, and operational safety evidence.

The WR also notes that the BESS is designed to operate on both import and export, which may be relevant to the balance of policy support relied upon. These sections may therefore assist consideration of pollution risk, environmental protection, emergency planning arrangements and the adequacy of the Outline Battery Safety Management Plan. The corresponding procedural signposts include #6A, #6E and the BESS-related safety deficiencies identified elsewhere in the WR and Appendix M.

## **7. Good Design**

The WR's comments most relevant to good design appear in Sections 8.0 (Layout, design and operational coherence) and 10.0 (Spatial configuration, design efficiency and land-use optimisation), together with Section 20.0 (Absence of defined design parameters). These sections address fragmented layout, fencing extent, mitigation-led design, residential proximity, north-facing slopes (see procedural deficiency #4B) and whether the layout represents an efficient and proportionate use of land.

## **8. Environmental Management Plans, during construction and operation**

The most relevant sections are Section 6.0 (Outline soil management plan), 14.0 (Construction environmental management and mitigation), 15.0 (Critical review of the applicant's outline battery safety management plan) and the DCO-related securing provisions in Section 20.0. These sections may assist the Council where it is considering whether outline plans are sufficiently detailed at this stage and whether the draft Requirements adequately secure the mitigation assumed in the ES.

## **9. The draft DCO, including Requirements and discharge mechanisms**

The key section is Section 20.0 (Draft Development Consent Order). In particular, Bedford Borough may find content useful in relation to adequacy of safeguards, decommissioning and financial security, design parameters, BESS safety, noise / lighting / replacement-phase controls, traffic / workforce logistics and soil restoration. The WR also signposts relevant precedent in Appendix N.

Because the WR links many of these concerns to the enforceability of mitigation and the adequacy of the dDCO, Bedford Borough may also find it useful to review the concluding discussion in Section 21.0 and the consolidated table in Appendix M.

## **10. Procedural Deficiencies and Evidence Gaps**

For ease of navigation, the consolidated schedule is at Appendix M – Procedural Deficiency and evidence gap table, with supporting traceability in Appendix L – Cross reference table of supporting insertions, and precedent material in Appendix N – DCO precedent Summary table. The WR expressly states that Appendix M is

intended to consolidate the principal procedural and evidential concerns raised throughout the Representation.

SEPE hopes this cross-reference is of practical assistance to Bedford Borough Council in identifying parts of the WR that may be relevant to the SoCG topics identified by the Examining Authority. We would be pleased to clarify any of the references above if that would assist officers in navigating the WR.

Yours sincerely,

Stop East Park Energy (SEPE)

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