BEACON FEN ENERGY PARK

Planning Inspectorate Reference: EN010151

Applicant Responses to Relevant Representations

Document Reference: 9.2

October 2025

The Planning Act 2008

Quality information

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BS	ED	JM	JM

Abbreviation	Description
AC	Alternating Current
AIS	Air Insulated Switchgear
AMS	Archaeological Mitigation Strategy
Applicant	Beacon Fen Energy Park Ltd
BBC	Boston Borough Council
BESS	Battery energy storage system
CCTV	Closed circuit television
DC	Direct Current
DCO	Development Consent Order
EA	Environment Agency
GIS	Gas Insulated Switchgear
HV	High Voltage
IDB	Internal Drainage Board
LCC	Lincolnshire County Council
LFR	Lincolnshire Fire and Rescue
Low Carbon	Low Carbon Ltd
MW	Megawatts
NGR	National Grid Reference
NKDC	North Kesteven District Council
NPSs	National Policy Statements
NSIP	Nationally Significant Infrastructure Project
OBSMP	Outline Battery Safety Management Plan
OCEMP	Outline Construction Environmental Management Plan
OCTMP	Outline Construction Traffic Management Plan
ODEMP	Outline Decommissioning Environmental Management Plan
Order	The Beacon Fen Energy Park Order
PCU	Power Conversion Unit
PINS	Planning Inspectorate
Proposed Development	The entire development to be constructed and operated within the Site, as set out in Schedule 1 of the draft DCO
PRoW	Public Right of Way
PV	Photovoltaic
Site	The entire Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington
SLR	SLR Consulting, formerly Wardell Armstrong (WA)
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State

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Appendices

1. Introduction

1.1.1 This document detailing the Applicant Responses to Relevant Representations **(Document Ref: 9.2)** has been prepared on behalf of Beacon Fen Energy Park Ltd (the 'Applicant'). It relates to the application (the 'Application') for a Development Consent Order (a 'DCO'), that has been submitted to the Secretary of State (the 'SoS') for the Department for Energy Security and Net Zero, under Section 37 of the Planning Act 2008 (the '2008 Act').

1.1.2 This document is intended to summarise the Applicant's present position on the matters raised in all relevant representations ('RR') submitted in respect of the Application.

1.1.3 The full text of the RR and the Applicant's comments on each RR are provided in separate sections of this document dedicated to different categories of consultees. These are as follows:

- Section 2 – Responses to representations from Statutory Consultees, Local Councils and Parish Councils;
- Section 3 – Responses to representations from those with land interests;
- Section 4 – Responses to representations from members of the public / businesses; and
- Section 5 – Responses to Late Submissions.

2. Responses to representations from Statutory Consultees, Local Councils and Parish Councils

Table 2.1: Responses to representations from Statutory Consultees, Local Councils and Parish Councils

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
RR-035	Borough Council of Kings Lynn and West Norfolk	We have no comments to make. The proposal does not encroach on, or affect our Borough.	The Applicant notes that Borough Council of Kings Lynn and West Norfolk have no comments on the Proposed Development.
RR-003	Newark & Sherwood District Council	The site is located some distance from the boundary line with the Newark and Sherwood District, however as a neighbouring Authority it is recognised that the districts in North Nottinghamshire have received a high proportion of applications for solar farms. Within the district of Newark and Sherwood we too have received a high volume of such applications (One Earth EN010159 and Great North Road Solar and Biodiversity Park). As a district we are concerned over the local impact of the scheme overall, however we accept that the distance is such that it would not have any direct impact on the visual impact from within the Newark and Sherwood District. Newark and Sherwood would like to bring to the Examining Authorities attention the consideration of cumulative impact of schemes such as this on an area and the duty to consider this within the Planning Practice Guidance (Paragraph: 007 Reference ID: 5-007-20140306). Cumulative effects assessment and the requirement for such is set out in the Environmental Impact Assessment Directive and the assessment of the effects of certain public and private projects on the environment. The need to consider cumulative effects in planning and decision making is also set out in planning policy, particularly the National Policy Statements. The overarching National Policy Statement for energy (EN-1), for example, specifies a range of aspects for which the applicant's assessment in the Environmental Statement should consider cumulative impacts, as relevant to the development. Paragraph 4.1.5 of EN-1 states that the Secretary of State should take any long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts, when weighing the adverse effects of a project against its benefits. National Policy Statements for other types of infrastructure also set out sector specific requirements for cumulative assessment1. A Cumulative Effects document has been submitted (APP-056) with the Scheme and it is suggested by Newark and Sherwood, that its suitability against National Policy should be taken into consideration as the Examination moves forward. At this stage we have no further comments to make.	A full cumulative assessment has been undertaken for the Proposed Development and is presented with the Application documentation (see **Environmental Statement ('ES') Chapter 18 Cumulative Effects (APP-069)**. The list of schemes considered within the assessment of inter-cumulative effects is provided at **Appendix 4.2 Cumulative Assessment Short List (APP-082)**. This list includes One Earth Solar Farm, but does not include Great North Road Solar, because at the time the shortlist was established the application had not yet been submitted, which follows the criteria set out in **ES Chapter 4 Scope and Methodology (APP-055**). Each technical chapter of the ES considered this list in order to identify schemes which would be likely to result in significant effects with the Proposed Development, in relation to the topic under consideration. Table 18.3 within Chapter 18 the ES confirms the schemes considered in relation to each topic. The cumulative assessment set out in Section 18.5 of Chapter 18 concluded that there were no potential significant adverse cumulative effects, with the exception of those potentially arising in relation to agricultural land, in terms of the total agricultural land (and 'best and most versatile' ('BMV') land) lost due to the Proposed Development in combination with the other developments. Furthermore, the **Planning Statement (APP-277)** includes consideration of National Policy Statement ('NPS') NPS EN-1, with specific mention of paragraph 4.1.5 in stating that "the Secretary of State ('SoS') should take into account both the potential benefits and any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate, or compensate for any adverse impacts." With regards to this, the **Planning Statement (APP-277)** at Section 7 provides an assessment of the key benefits and adverse impacts of the Proposed Development. It shows that the Proposed Development would have a number of substantial benefits and that these clearly outweigh its adverse impacts. The **Planning Statement (APP-277)**, including the policy compliance assessment tables within Appendix 3B which demonstrate conformity with the NPS, consider in detail the sector specific requirements for cumulative assessment included in the NPS for Renewable Energy Infrastructure (EN-3).
RR-005	South Kyme Parish Council	Overall, the general opinion of the Council is in favour of renewable energy however, consideration must be given to the loss of fertile agricultural land and the impact that poses upon the Nation's food security.	Use of agricultural land / food security

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		A screening and planting scheme is proposed to minimise the visual impact of the facility; however, the height of the solar panels quoted is up to 3.9 m in some documents, but 4.5m on the Planning Inspectorate site. This represents a significant increase and raises concerns regarding the visual impact, especially during the construction phase as the site will not be adequately screened by new planting for a period of time. The Council considers the planting to be an essential element of the project and suggests the hedges or trees should be of native species. The project has looked at the impact on local roads by traffic associated with the site construction, operation and decommissioning. Traffic is expected to use the A17 however the Council is duly concerned that no statement exists that when travelling from the North, the B1395 will not be used in order to reduce the distance of travel by vehicles. Residents have genuine concerns that construction materials will be transported through South Kyme. The B1395 is unsuitable for the transportation of solar panels and construction materials due to its undulating surface, narrow stretches and very tight corners. It should also be ensured that the connection of the disused footpath with the proposed permissive path is undertaken by the project.	**ES Chapter 14 Soils and Agricultural Land (APP-065)** sets out how the Applicant has sought to avoid and reduce the amount of BMV agricultural land used for hard infrastructure associated with the Proposed Development, and **Appendix 14.4 Outline Soil Management Plan (oSMP) (APP-176)** details the measures to mitigate impacts to the soil. Preparation of detailed Soil Management Plans is secured via a requirement in the **Draft DCO ('Development Consent Order') (AS-008)**, implementing best practice guidance on soil handling. The temporary and reversible nature of the majority of the Proposed Development, along with the measures within the oSMP, will allow for reinstatement of the Site to agricultural production following decommissioning. The UK Food Security Report 2024 analyses land use change and concludes that "*food production levels could be maintained or moderately increased alongside the land use change required to meet our Net Zero and Environment Act targets and commitments*." Footnote 62 of the National Planning Policy Framework was amended in December 2024 and now omits the consideration of the availability of land for food production. The Written Ministerial Statement of 15th May 2024 refers to food production and restates the Government's objective of broadly maintaining current levels of production. The potential reduction of food production from the Site would be negligible when viewed in the context of UK food production. <u>Height of panels / visual impact</u> Within the Environmental Impact Assessment ('EIA') Scoping Report (**Appendix 1.1 Scoping Report (APP-071)**), as submitted to the Planning Inspectorate ('PINS') in April 2023, a worst-case panel height of 4.5m was considered. Flood modelling has since been undertaken to identify the minimum clearance required below the panels, which in turn has been used to identify the maximum panel heights for consideration within the ES. This has allowed for a reduction in panel heights, reducing the potential visual effects of the Solar Array Area. To clarify the current position, the height of the panels is now up to 3.9m in fields to the east and 3.5m in fields to the west, south and an isolated field in the north. Flexibility has been maintained in accordance with Design Objectives SAA2 and F1 included in the **Design and Access Approach Document (APP-278)**. These design parameters are secured through Requirement 5 of Schedule 2 to the **Draft DCO (AS-008).** The existing field pattern and associated perimeter vegetation, consisting of hedgerows with trees alongside hedgerows forming the field boundaries, will largely be retained. As set out in **ES Chapter 6 Landscape and Visual (APP-057)**, proposed native hedge plants will be between 0.6m and 0.8m in height, with tree planting between 1m and 3.5m in height on completion (year 0), and all proposed planting will be implemented and managed in accordance with the **Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)**. By year 15, the tree planting will have grown by an assumed 3m in height (equating to 20 centimetres per year) and will, therefore, range between 4m and 6.5m in height. New and existing hedgerows will be managed and maintained at a height of up to 3.5m. This includes management of existing hedges to a height of 3.5m during the

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			construction phase to contribute to visual screening of the works. The oLEMP is secured pursuant to Requirement 7 of Schedule 2 to the **Draft DCO (AS-008).** Section 6.6 of **ES Chapter 6 Landscape and Visual (APP-057)** sets out the mitigation measures proposed to reduce landscape and visual impacts during construction, operation and decommissioning of the project. <u>Traffic and Transport routes</u> **ES Chapter 9 Access and Traffic (APP-060)** notes that construction access to the Site will be from the A17, using the proposed new Bespoke Access Road to minimise impacts on local road users. Section 4.2 of **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)** outlines that all contractor and delivery traffic will be required to follow the prescribed construction traffic routes. Haulage contractors and contractor staff will be informed of the relevant routes by the site manager(s) or delegated representative(s) as part of delivery and joining instructions. The oCTMP states "*Before construction commences the Site Manager(s) will engage with local town and parish councils and will write to neighbouring properties with information about the construction programme and activities, also providing the CTMP Coordinator contact details*." The oCTMP is secured pursuant to Requirement 13 of Schedule 2 to the **Draft DCO (AS-008).** Requirement 13 states that the CTMP must be submitted to and approved by the relevant planning authority, such approval to be in consultation with the relevant highway authority. This allows for detailed measures to ensure construction traffic uses the prescribed routes. <u>Permissive path</u> A permissive path, including several footbridges over ditches, is proposed within the Solar Array Area during the operational phase, thereby connecting the existing PRoW Ewer/12/1 to a wider network during the operational lifetime of the Proposed Development. This is secured by Requirement 15 in Schedule 2 of the **Draft DCO (AS-008)** and represents an enhancement of the existing situation.
RR-016	UK Health Security Agency ('UKHSA')	Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that: For potential EMF health impacts, UKHSA advises that according to the following voluntary Code of Practice, if the cable exceeds 132 kV, a calculation or measurement of the maximum fields directly above the cable is required to demonstrate compliance with ICNIRP exposure guidelines: <u>https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf</u> The EMF exposure estimates quoted in section 17.8 of the Environmental Statement are not specific to the 400 kV cables in the proposed development (e.g. depth of the cable, current, cable layout). The reference 8 in 17.8.4 has been redacted, but it seems to come from (Redacted). If so, the quoted values have been taken from a graph used for comparison between overhead and underground cables, and do not necessarily provide a general conservative assessment.	**ES Chapter 17 Other Environmental Topics (APP-068**) has been updated to include a measurement of the maximum field directly over the underground 400kV cable. In response to this representation, we have also updated **ES Chapter 17 Other Environmental Topics (APP-068**) to consider the potential effects to receptors of electro-magnetic fields ('EMF's) produced by the Proposed Development. The updates to this Chapter note that: • measures have been incorporated within the design of the Proposed Development to minimise potential EMF effects; • in accordance with the Department of Energy and Climate Change's ('DECC's) Voluntary Code of Practice 2012, as the maximum value is less than the International Commission on Non-Ionizing Radiation Protection ('ICNIRP') guideline levels, it may be assumed that all fields and exposures from that source will be compliant; and

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		We would like to point out that a detailed EMF assessment, as specified in the code of practice, that was raised by us at the Section 42 stage has not been addressed by the applicant.	• therefore, it is considered that the Proposed Development will not result in significant effects in relation to EMF. It is considered that this updated assessment fully addresses the UKHSA's relevant representation.
RR-010	National Gas Transmission Limited	This relevant representation is submitted on behalf of National Gas Transmission ("NGT") in respect of Beacon Fen Energy Park Limited's (the "Applicant"), application for consent for the Beacon Fen Energy Park DCO and in particular NGT's infrastructure and land which is located within or in close proximity to the proposed Order Limits. The Applicant is seeking permanent acquisition of rights over plot 14-1 which contains NGT existing infrastructure. The Book of Reference (APP-044) shows the extent of permanent rights sought by the Applicant. NGT will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required on the impact to its apparatus and rights. Further detail is set out below [see attachments in hyperlink]. **NGT has infrastructure within the proposed Order Limits** NGT owns or operates the following infrastructure within the proposed Order Limits for the Project. The transmission pipeline form an essential part of the gas transmission network in England, Wales and Scotland. Transmission Pipelines: • Feeder 7 – East Heckington to Gosburton **Protection of NGT Assets** As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is located within or in close proximity to the draft Order Limits. As noted, NGT's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGT will require protective provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGT is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required. NGT requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGT assets which will remain in situ, along with facilitating all future access and other rights as	Protective Provisions for the benefit of NGT have been included within the **Draft DCO (AS-008)** in Part 4 of Schedule 11, to ensure that NGT's undertaking is protected from any serious detriment being caused by the Proposed Development. The content of these provisions is subject to ongoing engagement between the Applicant and NGT. The Applicant is confident that agreement will be reached, which will enable the representation to be withdrawn. However, in circumstances where it is not possible to reach agreement, the Applicant will put forward final proposed protective provisions to be included in the **Draft DCO (AS-008)** for the protection of NGT. The Applicant will make submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on NGT's statutory undertaking, and so satisfy the tests within section 127 of the Planning Act 2008.

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		are necessary to allow NGT to properly discharge its statutory obligations. NGT will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. **Compulsory Acquisition Powers in respect of the Project** As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, the protective provisions must require that the Applicant obtain NGT's consent to the acquisition of any such land or rights. NGT objects to the compulsory acquisition of its assets, land or rights over its land in the absence of its standard form protective provisions. NGT will require further discussion with the Applicant. NGT reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement.	
RR-017	Cadent Gas Limited	Cadent wishes to make a relevant representation to the Beacon Fen DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits should be maintained at all times and access to inspect such apparatus must not be restricted. The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has low and medium gas pipelines and associated apparatus located within the order limits which are affected by works proposed, the extent to which is still being assessed and which may require diversions subject to the impact. Any Proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed. At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements. Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise. This is a fundamental matter of health and safety. At this stage, Cadent is not satisfied that the tests under section 127 of the PA 2008 can be met. Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any	The Applicant notes the comments made by Cadent Gas Limited and the request for protective provisions to be included in the **Draft DCO (AS-008)**. The Applicant and Cadent Gas Limited are in discussions regarding the appropriate form of provisions. The Applicant is confident that agreement will be reached, which will enable the representation to be withdrawn. However, in circumstances where it is not possible to reach agreement, the Applicant will put forward final proposed protective provisions to be included in the **Draft DCO (AS-008)** for the protection of Cadent Gas Limited. The Applicant will make submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on Cadent Gas Limited's statutory undertaking, and so satisfy the tests within section 127 of the Planning Act 2008.

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		development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed but are in discussion between parties. Cadent wishes to reserve the right to make further representations as part of the examination process but will seek to engage with the promoter to reach a satisfactory agreement.	
RR-007	Forestry Commission	As a Non-Ministerial Government Department, the Forestry Commission provides no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland. **Ancient and veteran trees:** Ancient and veteran trees are irreplaceable habitats. Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states: "The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists." We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England. The Joint NE/FC Standing Advice states that for ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals). The Arboricultural Report states that construction is planned within the RPA's of several veteran trees. It is our view that habitat deterioration to these irreplaceable habitats is likely to occur if construction occurs within the RPA's, particularly for access roads which will potentially carry heavy equipment. Even where a track has previously been used for farm access, any increase in traffic is likely to have an adverse impact. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage. The RPA should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic where roots are particularly vulnerable to compaction. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.	No development works will take place within the Root Protection Areas ('RPA's) and buffer zones of veteran trees. Only two veteran trees were identified in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** as being potentially impacted by the Proposed Development, prior to mitigation. The first veteran tree that was identified as being potentially impacted prior to mitigation is tree T95, which is within the Solar Array Area. The potential impact identified was the proposed installation of site fencing within T95's veteran buffer zone (note, not within the tree's BS 5837:2012 derived RPA). It is stated in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** that: "*The Site fencing shall be located outside of the veteran tree buffer zones of the veteran trees as detailed on the Tree Protection Plan Sheets 1-12 (Drawing ST19595-106-1), at the detailed design stage, which are to be secured post consent by the requirement to prepare a detailed CEMP"*. Therefore, there will be no deterioration of the veteran tree T95 caused by the Proposed Development, because this tree's RPA and veteran buffer zone will not be impacted. The second veteran tree identified in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** as being potentially impacted by the Proposed Development is tree T1124, which is within the proposed Cable Route Corridor. More specifically, the tree's veteran buffer zone and BS 5837 derived RPA is located within one of the proposed access routes for cable installation works. This access route will utilise a well-established existing farm track. This track has an aggregate wearing course that is already compacted from usage to date. As an existing farm track, the soil underlying this track will have become compacted over time by frequent use by farm vehicles and machinery, thus the soil underneath the track is highly unlikely to be suitable for tree root growth. The Department for Communities and Local Government publication 'Tree Roots in the Built Environment (The Stationary Office, 2006)' provides guidance on soil compaction and tree root growth. It states that: "*Pedestrian traffic and vehicle movement cause soil compaction. It is very important to realise that a major contribution to soil compaction occurs in the first pass of vehicles over the ground. Figure 4.3 shows the increase in soil bulk density in an agricultural soil with a single pass of a tractor and trailer and that a major fraction of the compaction occurs when only two wheels have passed over the ground. The direct impacts of compaction are a loss of pore space and an increase in bulk density. Growth of roots is restricted in compacted soils. Destruction of macropores reduces the number of pathways for root proliferation and increased soil strength causes mechanical impedance for root elongation. Roots are unable to enter pores narrower in diameter than the root cap, unless they can exert sufficient pressure to displace soil particles and widen pore openings. In compacted soil, the*

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			pressure required to displace particles is higher than in in more loosely packed soil because of increased mechanical strength when particles are forced apart… Roots are unable to exploit soils which have a bulk density of '1.8 g cm^{-3} and above". The aforementioned track is a well-established track with a compacted aggregate wearing course, thus the soil underlying tit will likely be compacted to a level that makes it non-conducive for root growth due to previous compaction damage. This compacted soil is very unlikely to become 'even more' compacted due to use by traffic using it for the cable installation works. As such, use of the track for the cable installation traffic will not be detrimental to the root system of the veteran tree T1124 and will not lead to a deterioration of the physiological functioning of the tree or the veteran habitat that the tree provides.

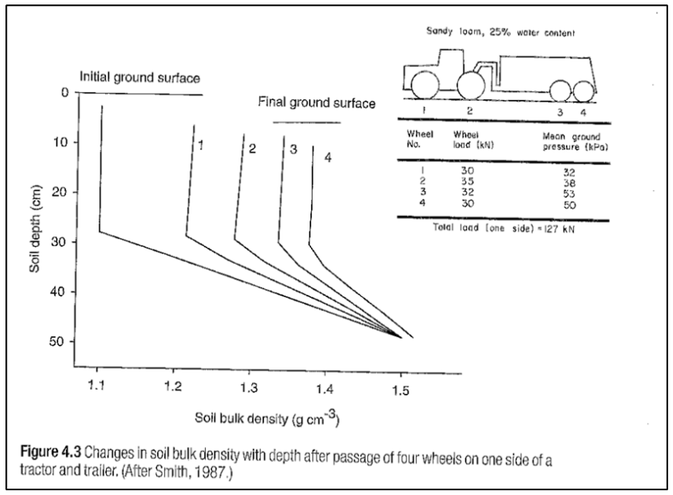

Figure 4.3 Changes in soil bulk density with depth after passage of four wheels on one side of a tractor and trailer. (After Smith, 1987.)

Figure 4.3. (Ref. Tree Roots in the Built Environment (Department for Communities and Local Government – The Stationery Office, 2006)).

The remainder of tree T1124's veteran buffer zone and RPA will be fenced off (during usage of the track as part of the Proposed Development), thereby protecting the unsurfaced parts of the buffer zone and RPA from traffic associated with the Proposed Development. **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** states that "*If the track is to be upgraded or refurbished, these works shall be assessed by the Project Arboriculturist and appropriate mitigation measures will be specified and complied with"*. The above mitigation is secured through **Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)** via Requirement 12 of Schedule 2 in the **Draft DCO (AS-008**).

As set out within **Appendix 2.4 Outline Construction Environmental Management Plan** (**APP-077**) and secured via Requirement 12 of Schedule 2 in the **Draft DCO** (**AS-008**), monitoring will be undertaken during the construction phase. The Applicant does not consider that veteran trees will need to be monitored following completion of construction activities. As set out above, this is an existing farm track that has been in use previously to date and will be in use following construction of the Proposed Development. Thus, any monitoring of the tree following construction would not be able to differentiate between impacts

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			arising as a result of construction, as opposed to the continued use of the track by farm traffic.
		Priority Habitat: There are several isolated fragmented areas of mixed deciduous woodland within the order area for solar PV installation. Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England). They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England". Paragraph 187b of the NPPF (Dec 2024) states: "Planning policies and decisions should contribute to and enhance the natural environment recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland." Fragmentation is one of the greatest threats to mixed deciduous woodland. Loss of habitat connectivity is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides. These woodlands can also suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development. While it is noted that a 15m buffer will be provided for the woodlands on site, it is concerning that the Arboricultural Impact Assessment states details of protection measures for the onsite trees and woodlands will not be provided until post consent. This makes assessment difficult of whether any planned mitigation measures for both direct and indirect impacts, particularly in the case of irreplaceable habitats are suitable.	Woodland blocks within the Solar Array Area are currently isolated within an arable landscape. A key objective of the landscape strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) is to improve connectivity between the various isolated, woodland blocks and scrub through the introduction of new hedgerows and native shrub planting. Boundaries of woodland that are currently ploughed will be grassed, providing alternative habitats for invertebrates. This objective was informed through a collaborative approach between the Project Ecologist and Landscape Architect, and in response to stakeholder comments from the Forestry Commission (01 March 2024) and Lincolnshire Wildlife Trust (01 March 2024). All surveyed trees and woodlands have been allocated RPAs, and for veteran trees an additional buffer zone. This complies with the BS 5837:2012 and the Government's Standing Advice '*Ancient woodland, ancient trees and veteran trees: advice for making planning decisions'*. The protection measures for trees and woodlands based on the aforementioned RPAs and veteran tree buffer zones will be detailed in an Arboricultural Method Statement ('AMS'), the preparation of which is required as part of the detailed Construction Environmental Management Plan (CEMP). It is a standard approach to finalise tree and woodland protection measures in an AMS as part of the CEMP post-consent. The proposed site fencing, supplemented with Heras-type fencing as described in BS 5837, and post and wire fencing, with the latter used primarily for hedgerow protection, including their proposed locations within the Solar Array Area and Bespoke Access Corridor, are detailed in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)**.
		Woodland Loss: We note the application states there will be the loss of an area of woodland and line of trees around the Bicker Fen Substation, also another small area of woodland within the site, 6 individual trees, 1 tree group and parts of another 2 groups. It is unclear from the plans whether this loss of canopy cover will be replaced as the documents seem to suggest the majority of compensation will be in the form of shrub planting with some small areas of woodland for screening.	The individual trees and tree groups to be removed to enable the Proposed Development are predominantly young to early-mature trees of low to moderate arboricultural quality. The two sections of woodland proposed for removal are semi-mature to early mature in age, of moderate arboricultural quality. As outlined in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**), the approach is to improve those left and improve connections. The total loss of canopy cover over the Solar Array Area, Bespoke Access Corridor and Cable Route Corridor will be 8,335m², with the vast majority of these losses being accounted for by the Bicker Fen substation extension. The total area to be planted with a native woodland mix is 39,630m², which is 4.75 times the canopy cover to be removed. Therefore, the Proposed Development will result in a significantly greater area of canopy cover, providing a Biodiversity Net Gain ('BNG') on Site.
		Tree and woodland planting:	A key objective of the landscape strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) is to improve connectivity between the various existing

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		We note from the Landscape Masterplans that plans include some tree planting within the site. These are difficult to identify in current plans and appear to be narrow strips for screening purposes. Ideally, we would like to see woodland creation carried out in 5ha blocks, or that connecting planting with existing woodlands should create blocks of at least 5ha. Connectivity across the site could be improved and enhanced with larger blocks of woodland creation and woodland edge. Paragraph 4.3.20 of the Overarching National Policy Statement for Energy (EN-1) states: "The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act." It is important that woodland creation is not just used as screening at strategic locations and ensures habitat connectivity throughout the landscape.	isolated plantation areas and scrub, through the introduction of new hedgerows and native shrub planting with trees. In this respect, advice provided by the Forestry Commission (1 March 2024) regarding the need to provide linkages between existing areas of woodland has been used to inform the landscape strategy. It should be noted that the landscape proposals are intended to provide a balance between providing improved connectivity with existing woodland and a strong green framework to assimilate the proposed energy infrastructure, whilst maintaining some perceptions of 'openness' which are a characteristic of the Fenland landscape. Ecological enhancements have been dictated by the landscape type using reference documents such as Natural England's National Character Areas. The landscape has only been drained in the 17th century and is largely flat 'big sky'; therefore, woodlands are not a key feature. Introducing more substantial woodland blocks as suggested would not be characteristic of the host landscape and would detract from its open character. Notwithstanding this, we have improved connectivity between woodland with hedgerows and will enhance the ecological value of the woodlands themselves through reducing nutrient input and deer grazing pressure. **ES Chapter 7 Ecology (APP-058)** has been produced with regard to the aims of the 25-Year Environment Plan 2023 and the Environment Act 2021. This sets out the extensive habitat to be provided pursuant to **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089),** which strengthens green and blue corridors through the Solar Array Area and into the wider landscape, as well as delivering significant BNG. The oLEMP is secured through implementation of a LEMP, as per Requirement 7 in Schedule 2 to the **Draft DCO (AS-008)**. The Applicant has also considered the Environment Act 2021, as evidenced by the **Biodiversity Net Gain Strategy (APP-280)** and the Applicant's commitment to achieving BNG through the Proposed Development. It is therefore considered the Proposed Development is compliant with policy 5.4.39 of NPS EN-1.
		Draft Development Consent Order: It is noted that Section 43 of the Draft Order appears to allow for the felling, lopping, or cutting back of roots of any tree or shrub in any part of the development which may be believed to be necessary from obstructing or interfering with the construction, maintenance, operation or decommissioning of the authorised development. It is particularly concerning this does not appear to require any opinion from an arboricultural specialist and does not allow an exemption for any irreplaceable habitat. We have concerns this would allow for any tree, including ancient and veteran trees to be felled with very little oversight and no consideration for habitat compensation.	Whilst Article 43 provides for the power to fell, lop and cut back roots of trees and shrubs, this is subject to the controls and restrictions contained within the Requirements contained within Schedule 2 of the **Draft DCO (AS-008)**. A CEMP is secured through Requirement 12 of the **Draft DCO (AS-008)**, which states that it must be substantially in accordance with **Appendix 2.4 Outline Construction Environmental Plan (OCEMP) (APP-077)**. **Appendix 2.4 OCEMP (APP-077)** at paragraph 6.14 includes the provision for an Arboricultural Method Statement and Tree Protection Plans to be prepared at the detailed design stage. The Arboricultural Method Statement and Tree Protection Plans will accord with the mitigation measures detailed in Chapter 6.6 of the **OCEMP (APP-077)**, which includes the following provisions: • Temporary fencing will be used to demarcate important and protected habitats and vegetation in accordance with industry standard guidance during the construction stage;

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			• Existing vegetation to be retained will be safeguarded through the establishment of tree protection zones that will be clearly fenced to prevent encroachment into root protection areas; • Any vegetation lost during construction, including trees, hedgerows or other valuable habitats, will be replaced (though not necessarily in the same location) and enhanced through proposed compensatory planting and seeding measures in accordance with the landscaping strategy. Paragraph 6.14.7 provides that a veteran buffer zone of 15 times their stem diameter or 5m beyond their crown spread (whichever is greater) has been allocated for each veteran tree, in accordance with the Government's Standing Advice 'Ancient Woodland, Ancient Trees and Veteran Trees: Advice for Making Planning Decisions'. Paragraph 6.14.15 in the **OCEMP (APP-077)** includes a provision for the appointed Arboricultural Clerk of Works (ACoW) to monitor tree protection measures. The AMS will detail which trees are to be removed and will include a provision that the ACoW shall be consulted on any further removals required, with the removals and any proposed compensation measures to be in accordance with specifications and methodologies as required by the ACoW.
		Avoiding impacts and good landscape design: To meet planning policy and Government guidance, we would recommend: • Robust adherence to the Standing Advice, especially regarding buffer zones, to rule out loss or deterioration to ancient and veteran trees. • Maintain and where possible improve woodland condition. • Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges. • Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats across the site, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area. • Sect 43 of the Draft Development Consent Order specifies an exemption for irreplaceable habitats. • Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050. • A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.	Within **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089),** Section 1.6 sets out measures for the protection and enhancement of existing habitat which includes the definition of buffers in relation to specific habitat types, including; woodland, hedgerows and individual trees. Measures to manage and improve 'Broadleaved Woodland with Scattered Trees' have been specifically addressed in the oLEMP. Trees to be retained have been identified in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** and the root protection areas for all retained trees has been identified. These areas are to be protected, and no construction activities will occur within these areas as set out in **Appendix 2.4 Outline Construction Environment Management Plan (OCEMP) (APP-077)**, Sections 6.6.5, 6.7.5 and 6.14.15. The Landscape Strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235**) has been designed to improve connectivity between the various existing isolated plantation areas and scrub, through the introduction of new hedgerows and native shrub planting with trees. In terms of access to woodlands for future management (for the purpose of improving and maintaining biodiversity and current woodland management programmes), **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** contains a specification of enhancement measures for retained and enhanced habitat, including hedgerows and woodlands. It also includes a specification for arboricultural works to rejuvenate trees and woodlands in poor current condition, involving the opportunity to create veteran tree features where appropriate and the use of grassland margins to provide a suitable buffer between development activities and retained trees, hedgerows and woodlands. The proposed access arrangements onsite are illustrated in **Figure 6.31 Landscape**

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			Strategy Plan (APP-233 to APP-235), with access for woodland management and maintenance to be confirmed at the detailed design stage. This will be specified within the Arboricultural Method Statement, within the Construction Environmental Management Plan (CEMP), the Decommissioning Environmental Management Plan (DEMP), and the Landscape and Ecological Management Plan (LEMP).
RR-014	National Highways	The Strategic Road Network (SRN) in the vicinity of the proposed development is the A1 Trunk Road. **National Highways Considerations Access** Access to the development is proposed to be taken from roads part of the local road network managed and operated by Lincolnshire County Council. National Highways has no comments to make about the proposed access. **Boundary Matters** The site is approximately 37km away from the SRN. Therefore, we have no boundary related comments. **Transport Assessment (TA)** Traffic Impact • Section 5 of the TA identifies the A17 as the nearest part of the Strategic Road Network (SRN). However, based on our review of official SRN mapping, the nearest SRN connection is at the A1/A46/A17 Winthorpe Interchange, approximately 37 km from the development site. We would appreciate it if the consultant could clarify this discrepancy and confirm the correct point(s) of access from the SRN. Assessment Methodology • We note that a 50:50 distribution of traffic beyond the eastern and western extents of the study area has been assumed, with no allowance for internal trips. Additionally, the assumption that 50% of staff car travel occurs outside of peak hours is considered robust, reflecting typical construction start and finish times. Construction Trip Generation (Section 4.5) • We acknowledge that the information provided in Table 4.3, which summarizes the estimated peak construction traffic movements per weekday, including approximately 342 two-way light vehicle (LGV, staff minibus, and staff car) movements and 82 HGV movements during peak construction, are considered a reasonable worst-case scenario for the assessment of construction traffic on the SRN. • We note that during the peak construction year, up to 41 one-way HGV trips per weekday are expected at the A17/A52 Bicker Bar Roundabout and 82 two-way HGV movements per weekday at the Swine head Bridge level crossing, with peak hour impacts estimated at approximately 4 and 8 HGVs per hour respectively, based on an even distribution over a 10-hour working day. • We are content with the traffic impact data and the methodology that has been provided in the TA as the impact of daily construction traffic during the peak construction year is expected to have minimal impacts on the operation of the SRN.	With regards to **Appendix 9.1 Transport Assessment ('TA') (APP-155 to APP-157),** National Highways ('NH') confirm they have no comments to make about access- or boundary-related matters. NH confirms that the assessment methodology is considered robust. NH acknowledges the information provided in relation to construction trip generation, concluding that it is considered a *"reasonable worst-case scenario for the assessment of construction traffic on the SRN [Strategic Road Network]"*. NH confirms it is content with the traffic impact data and methodology provided in the TA, and notes conclusions of operational traffic impact on the SRN as being negligible. The Applicant welcomes these confirmations and acknowledgments. It is confirmed that the statement quoted in **Appendix 9.1 Transport Assessment (APP-155 to APP-157)** is a discrepancy, and the nearest connection to the SRN is the A1/A46/A17, north-east of Newark, approximately 37km from the development site.

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		• We note that the operational traffic is expected to be minimal, with up to 24 two way light vehicle trips per day distributed across three access points, resulting in negligible impact on the SRN.	
		Outline Construction Traffic Management Plan (oCTMP) • We note that the A17 will serve as the primary route for construction traffic, with materials expected to arrive from either Immingham Port or the Port of Sutton Bridge. We would welcome further information from the applicant regarding the proposed route strategy along the SRN, including how materials arriving from these ports, and other locations across the country, via the A46 and A1, will be managed and routed to the site. • We acknowledge the information provided in the CTMP measures (Section 4), which state that the proposed hours of operation are Monday to Friday from 07:00 to 19:00, and Saturdays from 08:00 to 13:00, along with the associated delivery management plan. • We are content with the traffic management measures outlined in the Construction Traffic Management Plan (CTMP), which are considered appropriate for the proposed development, and we are content with this approach for SRN.	The feasibility of transporting construction materials from both Ports of Entry ('PoE') to the Proposed Development Site have been carefully considered by an Abnormal Load specialist, whose findings are presented in Appendix A of **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)**. The reports state that Lincolnshire County Council 'LCC' and National Highways provided comment on the routes. Further detail regarding the routes for abnormal loads and conventional heavy goods vehicles ('HGV's) on the A46 and A1 will be provided once further details on material sources, and therefore timing and quantity of vehicle movements, can be reasonably estimated. The detail will be provided within the Damage Mitigation Plan 'DMP' and Abnormal Loads DMP, which will form part of the Construction Traffic Management Plan ('CTMP'). The CTMP is secured pursuant to Requirement 13 of Schedule 2 to the **Draft DCO (AS-008).** The oCTMP states in relation to Abnormal Loads that: "*Each delivery will be planned in advance, escorted and managed such that any impacts are minimised. Such arrangements will be procured through standard processes (Electronic Service Delivery for Abnormal Loads ('ESDAL')) with the relevant planning authority at the appropriate time*". However, as set out in **ES Chapter 9 Access and Traffic (APP-060)**, there are no significant effects resulting from construction traffic on the A17 and this is also considered to be the case on the SRN, which carries both high volumes of background traffic and will only be used by a proportion of construction traffic. It is not anticipated that any specific management measures are required in relation to the SRN, except for abnormal loads. Abnormal loads will be managed via the ESDAL process, as set out in the ES and referenced above in relation to the oCTMP.
		Standing advice It is important to note that these comments imply no pre-determined view of the acceptability of the proposed development in traffic, environmental or highway terms and that these comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the Strategic Road Network (SRN) in England in line with the DfT's Circular 01/2022 to support sustainable delivery of growth. Comments relating to the Local Road Network should be sought from the Local Highway Authority.	The Applicant notes this and has responded to comments raised by the Local Highway Authority in their Relevant Representation.
RR-004	North Kesteven District Council ('NKDC')	**Best and Most Versatile (BMV) Agricultural Land** The Council has commissioned specialist advice from Landscope (agricultural consultants) on the impacts of the solar farm on agricultural land in a shared arrangement with Lincolnshire County Council and which has informed these comments. In line with Policy S67 'Best and Most Versatile Agricultural Land' of the Central Lincolnshire Local Plan (CLLP), the Council wishes to ensure that the need for the proposed development has been clearly established and there is an insufficient availability of lower grade land; the benefits of the development outweigh the need to protect such land, when taking into	It is proposed that an Agricultural Land Classification ('ALC') survey on the Cable Route Corridor will be undertaken pre-construction, to determine the distribution of ALC grades and provide detailed soil information to inform the soil management requirements of the cable installation. Based on the provisional ALC data, a Very High sensitivity was assigned for all agricultural land within the 183 ha (hectare) Cable Route Corridor in **ES Chapter 14 Soils and Agricultural Land (APP-065)**. This is the highest level of sensitivity that can be applied in accordance with the relevant guidance (Institute of Environmental Management & Assessment ('IEMA') (2022): A New Perspective on Land and Soil in Environmental Impact Assessment). Therefore, as recognised by

		account the economic and other benefits of BMV land; the impacts on ongoing agricultural operations have been minimised; and that the land will be restored to its former use. The Written Ministerial Statement on solar infrastructure (15 May 2024), in recognition of geographical clustering of proposed solar developments in some rural areas such as Lincolnshire, highlights the importance of considering 'not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality'. The Council are satisfied from the review undertaken to date that the Agricultural Land Classification report prepared by Wardell Armstrong is sound. Although the cable route corridor has not been surveyed, the ES is based on higher grades of agricultural land and it would be unlikely that the impact would be worse after survey, unless all the land is Grade 1 classification. As shown in Table 14.13 of Chapter 14 of the ES, it predicts that the impact on agricultural land use will be as follows: • Solar Array Area: this comprises 529ha of agricultural land. The actual area proposed to be under solar arrays for the lifespan of the development will be 395ha. This will comprise 191ha of BMV land and is considered to be a temporary loss due to the fixed lifespan of the development for 40 years. Part of the land will be under built development (access tracks and roads, construction compounds, BESS, substation and transformer stations). Whilst the proposals have sought to avoid Grade 2 agricultural land in particular, the avoidance of BMV land has not been possible and built development will result in the permanent loss of 14.25ha BMV land due to permanent 'sealing over' for the duration of the solar farm. • Bespoke Access Corridor: this comprises 45 ha of agricultural land. The area that would be utilised during construction will be 18.91ha. During the operational phase, the road together with associated drainage ditches and verges will cover an area of 3.98ha. This land is considered to be permanently 'sealed over' for the duration of the solar farm. Within this area, there will be a permanent loss of 2.70ha of BMV land and temporary loss of 12.94ha of BMV land during the construction of the access road. The remaining land within the Bespoke Access Corridor will be returned to agricultural use and it is assumed there will be no loss of agricultural land quality subject to the recommendations in the Appendix 14.4 Outline Soils Management Plan being adopted. • Cable Route Corridor: this comprises 183ha of agricultural land. This land has not been surveyed but using provisional Agricultural Land Classification data, it shows that 28.18ha would be Grade 1 and 145.73ha would be Grade 2 agricultural land ie falling into the BMV land category. Table 14.13 of the ES estimates that 39ha of land would be utilised for the Cable Route, 13.71ha for construction compounds, 1.8ha for air insulated switchgear system and 0.90ha for cable sealing end. Of this, a permanent loss of BMV would equate to 2.70ha. The amount of BMV land likely to be permanently lost due to 'sealing over' as a result of the proposed development would be 19.65ha. IEMA guidelines say that the permanent sealing of land above 20ha (including temporary development where there would be a reduction in soil quality) is	NKDC, the submitted assessment already presents a worst-case scenario, and the reported effects could not be increased through the results of a detailed soil survey. The areas of green infrastructure in the landscape strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will have no detrimental impact on soil quality. All areas of tree and hedgerow planting are proposed for field margins and areas not currently in agricultural use, and no new woodland is proposed. The proposed grassland and meadow habitats within the Solar Array Area will be returned to arable agricultural use through standard cultivation methods after decommissioning. Soil quality within these areas may in fact be improved in terms of organic matter content and soil structure, as there will be no intensive agricultural production during the operational phase. Therefore, there will be no permanent negative impacts on the agricultural potential of the soils and land as a result of the areas of green infrastructure. With minimal management changes on this land using standard agricultural practices, it could be returned to agricultural use and retain its agricultural quality. There is no intention by the Applicant or landowner (and no commitment proposed) for the BNG to be retained in perpetuity, nor is that appropriate in planning terms, as it could represent a permanent land use change. As such, it is submitted that the areas of green infrastructure should not be considered as agricultural land loss. Using the IEMA guidance, these changes in land use can be considered as Minor impacts: "reversible loss of one or more soil functions or soil volumes, or temporary, reversible loss of soil-related features", or Negligible impacts: "No discernible loss or reduction or improvement of soil functions or soil volumes that restrict current or proposed land use". In this case, loss of soil function is the loss of its biomass production potential (ALC Grade), which is easily reversible. For the ecological enhancement areas, it can be seen that there will be no loss or reduction in soil function in relation to soil quality/soil carbon. The green infrastructure areas are also providing additional ecosystem services for the Site. This should, therefore, be weighed against the food security contribution that the BMV land provides. The land under the solar panels will be returned to agricultural production; therefore, this should not be considered a permanent loss of agricultural land, only a temporary loss in agricultural production. There will be a loss in agricultural production during the life of the project, but the agricultural potential will be retained. The footprint of built development where "soil sealing" is required is assessed as permanent agricultural land loss in **ES Chapter 14 Soils and Agricultural Land (APP-065)**. This amounts to a total of 23.31 ha of permanent (worst-case) loss of agricultural land within the Solar Array Area, and 29.99 ha for the Order Limits as a whole (Table 14.13 in **Chapter 14 Soils and Agricultural Land APP-065**). Given that the area of permanent loss of agricultural land loss is >20 ha, this is assigned a "High" impact magnitude in the assessment, in line with the IEMA (2022) guidance, which is the highest magnitude category. In combination with a "High" receptor sensitivity, the resulting effect with embedded mitigation in place is Major and Significant in EIA terms using the matrix provided in the IEMA (2022) guidance. The worst-case of a Major and Significant effect on agricultural land is already accounted for in the assessment; therefore, increasing the area of land defined as being permanently lost would not affect the overall effect significance or the conclusions reached in the assessment.

		a major adverse environmental impact. This threshold would not be reached for the permanent 'sealing over' of land assuming that the soil augering/sampling and subsequent ALC gradation has been carried out in line with industry standards. However, there could be scope for variability in interpretation of these results and the above figure sits only marginally below the threshold by which effects might be major adverse and therefore 'significant'. It is noted that paragraph 14.13.18 of Chapter 14 of the ES concludes that there would be a major and significant environmental effect for the Solar Array Area due to the permanent loss of agricultural land based on a loss of >20ha of Grade 2, 3a and 3b land. The ES acknowledges that the broader loss of agricultural land for built development within the proposed development would be a major adverse impact. However, the Council has some concerns over how information about the impact on land use on agricultural land is covered in Table 14.13 as it does not include the amount of agricultural and BMV land, in particular, which would be lost due to new green infrastructure (temporary and permanent) and BNG provision within the Solar Array Area and bespoke access corridor. Other NSIP projects – notably the Springwell solar farm - have assessed that certain elements of green infrastructure (temporary and permanent) and BNG provision should be classed as a permanent loss on the basis that not all of those green infrastructure elements (especially woodland planting) would be reverted to agriculture at the end of the operational period. Overall, the proposed development would lead to the loss of 493.27ha of agricultural land of which 277.3ha would be BMV land (56%). The Council is likely to make representations on the amount of agricultural and BMV land that would be impacted due to the proposed development itself and also in combination with other developments across the District and County, noting that there is high proportion of BMV land within the site. The Council will also likely make representations on soil management and restoration to secure the land's quality at the end of the life of the solar farm and on the use of grazing below solar panels in its Local Impact Report and Written Representation.	
		Landscape and Visual Impact Lincolnshire County Council has commissioned specialist advice from AAH consultants on the impacts of the solar farm on landscape and visual impacts in a shared arrangement with the Council. Their initial comments are attached as Appendix A [see attachment]. A full review of the landscape and visual elements is currently being undertaken and will be included within the Council's LIR. The Council's consultant's initial comments can be summarised as follows: **Landscape Effects:** the development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect the wider landscape character, at a regional or county scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character, that are defining characteristics of the area. The Council is particularly concerned with identifying the landscape character effects through changes to the land use over an extensive area of agricultural land. The Council notes that significant effects have been	The landscape strategy (**Figure 6.31: Landscape Strategy Plan (APP-233 to APP-235)**) has been designed to achieve a balance between integrating the Proposed Development into the existing landscape context and minimising the presence of energy infrastructure, whilst maintaining a sense of openness which is a characteristic of the Fenland landscape. To achieve this objective, linear belts of native shrubs with trees and hedgerows, predominantly aligned with existing field boundaries, are proposed to connect with pockets of existing vegetation. This will provide effective screening of energy infrastructure, while still allowing longer distance views and the characteristic sense of openness to be maintained. It is recognised that at a local level the agricultural character of the Site will be diminished, but it has been found that the long-term characterising influence of the Proposed Development will not be strongly perceived beyond the immediate context of the Solar Array Area. This finding is confirmed in **ES Chapter 6 Landscape and Visual (APP-057),** where effects on the host Fenland Sub Area would reduce to Minor Adverse (Not Significant) at year 15, following establishment of mitigation planting. Effects on the Holland Reclaimed Fen will also reduce to

		identified and while these are a concern, the judgement within the LVIA appears to be well reasoned subject to a more detailed review. **Visual Effects:** the scale and extent of the development would also lead to significant adverse effects on views from visual receptors, resulting in a changed to the views experienced of an agricultural or rural landscape to a landscape containing large scale solar development. While we acknowledge that the new planting and habitat creation will be valuable assets within the context of the surrounding agricultural landscape, they are part of a large-scale solar development. The planting, if it establishes as predicted, will also go some way in screening and integrating proposals in views. However, we note that the reduction in significant landscape and visual effects predominantly relies upon the successful establishment of the planting scheme. **Cumulative Effects:** due to the extent and proximity of additional NSIP scale solar schemes in the area, the Council suggests that the Examination is utilised to explore the potential for significant effects from these schemes. Schemes further afield, such as Springwell, Leoda and Fosse Green solar farms, are also of concern, despite the intervening distances between these developments. We have concerns regarding effects on the national, county and regional landscape character areas. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across the published character areas. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing multiple schemes across potentially several kilometres, albeit with gaps between some of the projects. However, repeated views and presence of large scale solar would combine over time to create a greater perception of change. This would require an update of any published landscape character assessment, including at a national level. **Management and Maintenance:** through its LIR and WRs, the Council will likely examine the mitigation and maintenance measures contained in the Outline Landscape and Ecology Management Plan (oLEMP) and Figure 6.31 Landscape Strategy Plans, ensuring these reflect the LVIA and are contained in Requirement 7. The Council will seek an appropriate period of landscape maintenance that ties into a period of time identified in the oLEMP and would expect an initial 15-year period of management and maintenance as a minimum. **Control of Vegetation Removal:** the Council will seek to ensure that clear vegetation removal processes are put in place to ensure that any vegetation loss is aligned with the draft DCO (alongside figure 6.32 'Vegetation Removal Plans' and the Appendix 6.6 Arboricultural Impact Assessment, and any further removal or works) are agreed with the relevant parties prior to any works being carried out. **Residential Visual Amenity Assessment (RVAA):** The Council notes that several properties have been assessed within the RVAA due to their close proximity to the development. Only one property has been assessed as reaching the residential visual amenity assessment threshold until Year 10 (Gashes Barn). The conclusions of the RVAA will likely be considered	Minor Adverse (Not Significant) at Operation year 0 following cessation of construction activity. During the construction phase of the Proposed Development it has been found that significant visual effects would be experienced by nearby visual receptors, resulting from views of construction activity associated with the Solar Array Area, Cable Route Corridor and Bespoke Access Corridor. On completion, the Proposed Development will have a less widespread visual influence, resulting in significant visual effects for a smaller range of receptors who are in relatively close proximity to the Solar Array Area and the Bespoke Access Road. At year 15, following establishment of mitigation planting, it has been found that views of large-scale solar development or associated infrastructure would be further reduced and experienced by a limited number of visual receptors in close distance views. It is acknowledged that the reduction in significant landscape and visual effects over time is dependent on the successful establishment of the landscape scheme. However, the following measures have been adopted to maximise the likelihood of successful establishment: • The tree and shrub species specified have been informed by consideration of existing planting within the Site and the wider landscape context, which is successfully established and providing a positive influence on landscape character; • Consideration has also been given to climate change resilience through the specification of a diverse range of species, in accordance with good practice guidance (Forestry Commission: 'Managing England's woodlands in a climate emergency' (March 2020)); • **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089**) (secured pursuant to Requirement 7 of Schedule 2 to the **Draft DCO (AS-008)**) sets out measures in relation to the establishment (up to year 5) and longer-term management (year 5 onwards) of the landscape elements, which will progressively provide landscape assimilation. With regards to cumulative effects, **ES Chapter 6 Landscape and Visual (APP-057)** and **ES Chapter 18 Cumulative Effects (APP-069)** provide an assessment of cumulative landscape and visual effects at construction, operation and decommissioning within the 5km Landscape and Visual Impact Assessment ('LVIA') study area. In relation to the schemes considered within the LVIA, it has been found that there will be no significant cumulative landscape or visual effects. At a national and county level, the introduction of further development within NCA 46 – The Fens will result in an increased characterising presence of energy infrastructure. This is likely to result in adverse cumulative landscape effects for NCA 46. However, the contribution of the Proposed Development to this overall cumulative scenario would be limited because of the separation distance and limited intervisibility between the Proposed Development and other relevant schemes including Springwell, Leoda and Fosse Green. Comments relating to management and maintenance are noted and the Applicant will respond to such submissions with the Council's Local Impact Report ('LIR') and WR's as necessary. **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089**) sets out measures in relation to the establishment (up to year 5) and longer-term management (year 15 onwards) of the measures illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**.The

		further as part of the Council's LIR in the interests of protecting the residential amenity of the occupants of the most affected dwellings.	general principles for vegetation removal are set out in **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089**). These principles will be developed into detailed management prescriptions as part of the preparation and approval of the detailed LEMP(s). Comments relating to Residential Visual Amenity Assessment ('RVAA') are noted and the Applicant will respond to such submissions with the Council's LIR and WR's as necessary.
		Cultural Heritage **Archaeology:** the Council has an arrangement with Lincolnshire County Council to rely on the advice of the LCC Historic Environment (Infrastructure) Officer in respect of its participation in the Beacon Fen Energy Park examination. The Council supports the views of the LCC Historic Environment (Infrastructure) Officer which are summarised below and contained at Appendix B. In summary, LCC are satisfied that the work undertaken to date has been completed to the required standards and has provided an understanding of the archaeological potential, significance and likely impact arising from the proposed development. **Above-ground Heritage Assets:** the Council is broadly satisfied with the analysis and outcomes of the ES chapter on Cultural Heritage in relation to the above ground heritage assets including the identification of minor adverse impacts on the principal heritage assets. The Council agrees that at the construction stage, the Bespoke Access Road would have a Moderate Adverse impact on St Andrew's Church, Asgarby but it considers that there would be a similar impact on Asgarby Hall whose principal elevations look over the historic parkland where the new road would be in full view. During the operational stage, the Council considers that a moderate magnitude of impact should be ascribed to St Andrew's Church. This is considered to be a significant effect. The Bespoke Access Route would also impact on the setting of Boughton House (Grade II) which is not particularly considered in the ES leading to a slight adverse effect being identified. The Council considers that the assessment undertaken in relation to Boughton House is insufficient. Turning to the Solar Array Area, the impact on Howell Hall should be upgraded to Minor Adverse in the Council's opinion due to its landscape setting and open views towards the solar array. It is recognised that a buffer has been included, however, the setting and views from the curtilage of the property will still be adversely affected. Kyme Tower has been considered but not given significant weighting in the ES. The Council disagrees with the conclusion that the existing landscape will remain unchanged especially when considering the cumulative impact with Heckington Fen solar farm. Instead, it considers that the magnitude of impact should be at least 'medium'. The Council notes that the setting of Kyme Tower was given some weight in the Secretary of State's decision for the Heckington Fen solar farm as follows: *'4.13 The Secretary of State also agrees that the Proposed Development will contribute to a cumulative adverse effect on Kyme Tower's setting, albeit to a lesser extent than the potential additional harm of the emerging Beacon Fen Energy Park, that amounts to less than substantial harm to the heritage asset's significance. The Secretary of State therefore agrees*	**Archaeology**: The Applicant submitted a revised **Appendix 8.11 Archaeological Mitigation Strategy ('AMS') (APP-153)** to LCC for review, to be agreed upon when the final comments from LCC have been addressed. The strategy proposed will mitigate harm to below ground assets by avoidance or record where appropriate. The Applicant intends to submit the updated and agreed strategy into the Examination following discussion with LCC. **Above-ground Heritage Assets:** The assessment considers the contribution setting makes to significance and assesses the introduction of change within that setting. The assessment recognises the level of significance held by each asset and that significance rests primarily on the physical attributes of the heritage assets, but that setting can 'contribute' to that significance. Whilst the introduction of a solar farm may cause change, it should be acknowledged that change does not necessarily equate to harm. Following an online meeting on 15 August 2025 with NKDC and LCC, it was agreed to hold a site meeting to view and discuss issues regarding the setting of designated and non-designated heritage assets. This site meeting was held at and near various heritage assets on 5 September 2025. The information gathered from the site visits and meeting is reflected within this response on the individual assets referenced. Asgarby Hall is a Grade II Listed building that is set back a little further to the east from the road and is well screened by the intervening landscape and distance. There is no visibility from the Hall to the Bespoke Access Corridor or from the Bespoke Access Corridor to the Hall. The land rises slightly on Asgarby Plantation to the west and then dips again slightly towards the drain at the eastern boundary of the Bespoke Access Corridor. Therefore, combined with the trees and boundary, screening does preclude intervisibility in line with the assessment, which stated a neutral impact. The Church of St Andrew, Asgarby, a Grade I Listed building (NHLE 1061832) lies slightly closer but is subject to the same intervening distance and landscape, including trees and high hedge line screening, especially from the drain. Furthermore, the functional and historic association is towards the immediate south and east - to the cemetery, historic route ways north and south, and Asgarby Hall. The church is enclosed by a churchyard that bounds the church to the north, south and west, but leaves open access to the east from the porch and cemetery to the road. To the rear of the church (west) is the Asgarby Plantation, which provides a buffer and has an historic association with the church. Although the top of the church tower can be glimpsed in certain sections along the drain boundary hedge line, this will result in a slight adverse effect during the operational phase of the Bespoke Access Road and a moderate effect during construction (short-term and temporary effect only). The Bespoke Access Road will have a slight adverse effect on the setting of Boughton House (Grade II Listed). This is due to the intervening distance and landscape that provides a sufficient buffer. The land rises between the settlements

		with the ExA that the cumulative effects on the historic environment contribute to less than substantial harm at the lower end of the scale which should be ascribed moderate negative weight.' Finally, the Council considers that insufficient weight has been ascribed to non-designated heritage farmsteads. Despite an acknowledgement of a high impact on some occasions with the result of an adverse impact, there is little bespoke mitigation proposed to each asset with a reliance on embedded mitigation. The farmsteads include: • Unnamed Farmstead, Ewerby and Evedon (non-designated HER MLI121913) • Westmorelands, Asgarby Fen Farm (non-designated HER MLI121926) • Gashes Barn (non-designated HER MLI121916) It is clear that there will be an impact on the setting of designated and non-designated heritage assets and it is positive that, for the most part, this has been recognised in the ES. The significance and special interest of these assets will be affected by the changing landscape conditions arising from the proposed layout of the solar farm. The Council considers that greater weight and bespoke consideration of Kyme Tower, Asbarby Hall, St Andrew's Church, Boughton House and Howell Hall together with non-designated heritage farmsteads is required in order to inform a bespoke mitigation strategy for these heritage assets rather than a reliance on embedded mitigation.	of Boughton and Asgarby, combined with the intervening screening from hedgerows and tree lines, preclude intervisibility from the House towards the Bespoke Access Road. Therefore, this results in a low impact on significance in the worst-case scenario. There are no key views impacted as the key views are to the north and west. The key view to the west is towards the settlement of Asgarby and not beyond. Howell Hall is Grade II Listed. The buildings (NHLE 1168460) are situated south of the Solar Array Area. Key views from the Hall are to the east and the south concerning frontage and access to the road, respectively. Furthermore, the House is very well screened to the north by intervening buildings, hedgerows and dense treelines. There may be limited and glimpsed views during the winter months resulting in a slight adverse effect on significance and low impact in the worst case. Kyme Tower, a Grade I Listed building (NHLE 1204786), is a heritage asset of the highest designation and has been considered as such. Kyme Tower comprised the remaining element of a fortified house constructed during the 14th century and built within an existing moated site. It was part of a medieval enclosed settlement set within a perceptible bend of the River Slea to enhance protection and enclose the settlement. The keep tower was primarily built for protection to defend the inhabitants. Fortified towers / houses were usually built in inaccessible areas, isolated but protected. This tower appears to be constructed to also guard the trade route and the accessible route towards the village. Therefore, the immediate setting of Kyme Tower is the enclosed site associated with the river, the church (remains of the former monastery), the manor and the village to the east. This is not impacted by the Proposed Development. However, the change within the wider landscape from the Proposed Development (specifically the Solar Array Area) does impact the wider setting of the Kyme Tower through intervisibility from the top section and battlements of the Tower. The embedded mitigation measures incorporated through landscaping, appropriate infilling of the Midfodder Dike, and retention of field formations will reduce this harm to the wider setting during the operational phase. Therefore, the resultant impact would be slight adverse effect on significance, from the setting of Kyme Tower. The embedded mitigation proposed (see **Appendix 2.3 Embedded Mitigation (APP-076)**) would comprise the following: • Buffer Zones will be created to increase separation between the site and the asset. • Trackways, where possible, will follow existing boundaries in keeping with the historic landscape field pattern. • Height restrictions are set (fencing ≤ 4.5m, substation ≤ 13m, lightning rod ≤ 20m) to reduce visual impact and preserve rural character. • Underground cabling will preserve the visual landscape and reduce potential harm to heritage assets. Upon decommissioning, the cabling will remain in place to avoid further disruption. • Operational lighting will be installed solely for emergency purposes. This lighting strategy will help to maintain the current light levels and preserve the current night-time ambiance around the asset. • A Public Right of Way ('PRoW') will be reconnected towards South Kyme, reinstating a historic route.

			The issues regarding Asgarby Church of St Andrew, Asgarby Hall, Kyme Tower, Howell Hall and Boughton House have been viewed in greater detail with LCC. It has been agreed that the setting of these assets focuses more on use, function and historic association and (although important) is less about close proximity and visibility. No permanent effects greater than slight adverse have been identified and the effect to Asgarby Hall has been confirmed as neutral. To reiterate, the moderate adverse effect to the church is temporary. As Kyme Tower, Howell Hall and Boughton House are assets essentially sited within enclosed medieval settlements, their setting comprises the immediacy of their surroundings and that functional and historic association. For all three assets this immediate setting will not be compromised and, as such, effects through setting change are Not Significant. Non designated Heritage Assets: Unnamed Farmstead, Ewerby and Evedon (non-designated HER MLI121913); Westmorelands, Asgarby Fen Farm (non-designated HER MLI121926), and; Gashes Barn (non-designated HER MLI121916). These assets have been assessed individually. Based on the agreed assessment matrix, slight adverse effects have been identified during the construction phase. Therefore, considering the mitigation measures proposed, including landscaping and retention of field formations, this would further reduce harm during the operational phase. The embedded mitigation measures are bespoke to each asset and have been proposed to reduce the level of harm to the non-designated assets set out within **Appendix 2.3 Embedded Mitigation (APP-076).**
		Battery Energy Storage System (BESS) and Fire Safety In light of the rapidly growing volume of BESS facilities across the country, it has been recognised that appropriate health and safety standards are required and in recent years, new guidance has been emerging. In April 2024, the Department for Energy Security and Net Zero produced Health and Safety in Grid Scale Electrical Energy Storage Systems guidance which is applicable to this application. In addition, the National Fire Chiefs Council has produced Grid Scale Battery Energy Storage System planning – Guidance for Fire and Rescue Services in 2023, with an update that was due in 2024. Notwithstanding the isolated location of the BESS relative to centres of population and noting a separation distance of over 800m to the closest residential properties at Ewerby Thorpe Farm and Ewerby Lodge, the Council has strong concerns about the potential risk to human health arising from fire related accidents at BESS developments. The degree to which the Planning Act (2008) can compel what is essentially and ultimately a matter of customer choice is unclear. However, as above, with the suggestion that LFP cells have an advantage over other lithium-ion chemistries in relation to thermal and chemical stability, which improves battery safety, the Council's view is that the ExA should consider this matter through the Examination. Section 105 of the Planning Act (2008) requires SoS decisions to have regard both to 'any local impact report' and 'any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision'. The scope of material planning considerations is wide and must have a planning purpose that relates to the character and use of the land, and it must fairly and reasonably relate to the proposed development under consideration.	The Applicant confirms that the existing published (and emerging draft, but non finalised) National Fire Chiefs Council ('NFCC') guidance was taken into account in preparing the **Outline Battery Safety Management Plan ('OBSMP') (APP-279)**. The guidance was also used as an input to develop the project design. As confirmed in the **OBSMP (APP-279)**, the Applicant intends to have regard to the NFCC guidance in the preparation of the detailed Battery Safety Management Plan ('BSMP'), which must be submitted to and, in consultation with NKDC and Lincolnshire Fire and Rescue Service ('LFR'), and approved by the relevant planning authority in accordance with Requirement 6 in Schedule 2 to the **Draft DCO (AS-008)**. This **OBSMP (APP-279)** outlines the key fire safety provisions for the Battery Energy Storage System ('BESS') proposed to be installed at Beacon Fen Energy Park, including fire risk reduction and fire protection measures. Those measures include: • That the BSMP must be approved by the relevant planning authority and this must be in consultation with both the LFR and NKDC (pursuant to Requirement 6). The BSMP must be substantially in accordance with the **OBSMP (APP-279)**, which includes extensive controls aimed at ensuring safety; • The detailed design of the BESS must accord with design commitments and project parameters and must also be in accordance with the BSMP. The **OBSMP (APP-279)**, includes specific safety objectives (Section 2.5), and the Outline Design Principles at Appendix 1 of the **Design and Access Approach Document (APP-278)** provide additional controls to offsets and spacing; and • Protective provisions included in the **Draft DCO (AS-008)** for the LFR so that they can undertake an annual site familiarisation exercise (funded by

		In that regard the Council's view is that the 'perception of harm' to public amenity, safety and wellbeing associated with an incident at the BESS is capable of being a material planning consideration and we note that DEFRA plans to open a consultation on integrating grid-scale battery energy storage systems into the Environmental Permitting Regulations by June this year, in order to determine whether more robust regulatory and operational oversight is required. As such the Council consider that there is a need to agree the battery type proposed within the BESS as part of the requirement to agree the BSMP in view of the changing market trends and the need to minimise the impact on human health following any major accident or disaster, and the 'perception of harm' to public amenity, safety and wellbeing as a material planning consideration.	the Applicant) and to provide the necessary assurance to LFR that all the required systems and measures are in place in accordance with the BSMP. It is the Applicant's view that the battery type is not a material planning matter and should not be set as part of any planning decision. Firstly, it is not apparent that the development would be unacceptable without a control barring certain types of battery, i.e. it does not meet the planning condition test of necessity to be a lawful requirement. This request also goes further to exclude all battery types bar one, which is clearly unnecessary. To do so would also be counterproductive and prematurely lock in a battery technology that could be enhanced by one if not two generations before any procurement would take place. The demands of future insurers of the project will also influence battery selection and acts as a market based incentivisation to choose the best system available. The Applicant would choose the best system available at the time based on a range of factors, with safety to site personnel, first responders and the general public being central to that consideration. NPS EN-1 makes clear at 4.13.4 that in respect of safety there is a principle of not seeking to duplicate, within the planning determination, the control processes of other regimes, in common with the principle of not duplicating other environmental controlling regimes (4.12.10). The Applicant notes that Section 105 of the Planning Act (2008) applies where no designated NPS has effect in relation to a development. Given that NPS EN-1 and EN-3 have effect in relation to the Proposed Development, the application will instead be determined under Section 104.
		Ecology and Arboriculture The Council has commissioned specialist advice from AECOM on the topic of ecology. AECOM's full comments are attached at Appendix C. Overall, the ecological information and assessments accompanying the application contain a number of omissions and/or lack clarity on relevant points. These include matters relating to how prior advice (at Scoping or PEIR stages) has been addressed, clarity on the methods used and the data underpinning the conclusions reached. The Council would welcome the opportunity to discuss with the applicant how to resolve these issues. The BNG Strategy cannot be agreed until the applicant provides the full BNG Metric for examination and the good practice requirements for evidence are met. The Metric is one of the primary documents necessary for agreement of the BNG Strategy. At present, the Council is not satisfied that the currently BNG Strategy is robust as the evidence is weak and some of the assumptions seem unrealistic. From the Arboricultural Impact Assessment (AIA), the Council notes that six trees will be removed in the solar array area and that a number of high value trees, including Veteran Tree T1124, located within the cable corridor are close to an access track for construction purposes. The Council has concerns that the impact on these trees may be greater than anticipated in the ES due to increased usage of the access track for construction purposes eg causing compaction. The Arboricultural Impact Assessment identifies that some trees may need to be removed within the cable route corridor depending on the final design. It is not clear from the AIA what impact is likely on the six veteran trees identified within the Bespoke Route Corridor. It would be helpful if the applicant could confirm that as they are	On 14 August 2025 the Applicant met with NKDC and LCC to discuss the matters raised in their respective Relevant Representations. This discussion identified where there are areas requiring further clarification. **ES Chapter 7 Ecology (APP-058)** and the **Biodiversity Net Gain Strategy (APP-280)** will be updated with regards to the comments made in Appendix C and submitted at Deadline 2. Appendix C to NKDC's relevant representation contained a report from AECOM which analysed the ecological information and assessments prepared by the Applicant as part of the Application. This report identified a number of areas in which they consider the Applicant's assessment/information lacked clarity or contained omissions. In particular, the report notes that issues relate to " how prior advice (e.g. at Scoping and PEI Report stages) has been addressed, clarity on the methods used, and the data underpinning the conclusions reached" and also that "the BNG Strategy cannot be agreed until the Applicant provides the BNG Metric for examination, and the good practice requirements for evidence are met." The Applicant has provided some summary responses to these matters below, which explain why the Applicant considers its assessment approach to be robust and represent a reasonable worst-case understanding of the potential impacts of the Proposed Development. However, the Applicant notes and agrees with the report when it notes that "it is likely that most points can be suitably resolved" with the provision of additional clarification and further information and to that end the Applicant is committed to engaging with AECOM and NKDC through the SoCG process to resolving these matters. The Applicant hopes to be in a position to report positive progress in this respect at Deadline 2. Summary of key points in response: • NKDC have sought assurances regarding the use of the Rochdale Envelope to ensure an appropriate worst case has been considered where flexibility is

		not referred to in Table 9 of the AIA, they would not be impacted by any construction works. The Council will seek the replacement of retained trees that are at risk of removal from development once the detailed design is known. This will be in addition to the mitigation measures set out in the oCEMP, and to compensate for trees likely to be lost from ash dieback during the life of the development as a high number of ash trees have been identified within the tree survey as being present within the site.	retained in the design. The Applicant can confirm that this approach to the assessment has been adopted in the **Ecology Chapter (APP-058)**, for example along the Cable Route Corridor and Bespoke Access Road Corridor, where the precise locations of the final development components were not known. Worst case assumptions were made to identify a likely worst case scenario and mitigation (including updated surveys prior to scheme construction) identified based on this. As discussed in the meeting between the Applicant and NKDC (14th August 2025), further clarification will be provided. • NKDC further identify potential impacts for breeding birds as requiring survey/mitigation. The mitigation for breeding birds (including ground nesting birds) has been considered within **Chapter 7 Ecology (APP-058)**, however the Applicant did not go into further detail on individual species dues to the low number present and the site context (i.e. birds such ~~a~~ as barn owls may be more tolerant to disturbance in some parts of the site than others). Further clarification on the likely locations of mitigation will be provided in an updated **Chapter 7 Ecology (APP-058)** following further discussion with the NKDC ecologist. • NKDC consider there are inconsistencies in some of the habitat types, and where necessary **Chapter 7 Ecology (APP-058)** will be updated to clarify the methods for choosing habitat types. The applicant will make a review of the local strategy to highlight where the biodiversity enhancements within the **Biodiversity Net Gain Strategy (APP-280)** accords with the local and county planning objectives. • Further details were requested by NKDC to support the creation of certain rarer habitat types including floodplain grassland. This example was discussed at the meeting between the applicant and NKDC (14th August 2025), where NKDC was satisfied with the principle of the approach and requested cross reference with appropriate supporting documentation (e.g. **Chapter 11 Water Resources and Flood Risk APP-062**) **Chapter 7 Ecology (APP-058)** will be updated to clarify the high-level approach to habitat creation. There will be no impacts to the veteran trees located within and adjacent to the Bespoke Access Corridor, which is why they are not listed in Table 9 of **Appendix 6.6 Arboricultural Impact Assessment (APP-088),** which only details arboricultural impacts arising from the Bespoke Access Corridor development. Two of the veteran trees surveyed with regards to the Bespoke Access Road, are located outside of the DCO Order Limits. Neither are these two trees' crowns, Root Protection Areas and / or Veteran Buffer Zones within the Bespoke Access Corridor / DCO Order Limits. Four veteran trees are located within or on the DCO Order Limit boundary for the Bespoke Access Corridor. This corridor has been designed in close cooperation with the project's arboriculturists in order to avoid impacts to the four veteran trees located on and adjacent to the Bespoke Access Corridor. These four veteran trees are to be retained and will be fully protected during the Bespoke Access Corridor construction works fencing to BS 5837 standard, as

			outlined on the Bespoke Access Corridor Tree Protection Plans appended to **Appendix 6.6 Arboricultural Impact Assessment (APP-088).** The veteran tree identified in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** as being potentially impacted by the Cable Route is tree T1124. More specifically, the tree's veteran buffer zone and BS 5837 derived RPA is located within one of the proposed access routes for cable installation works. This access route will utilise a well-established existing farm track. This track has an aggregate wearing course that is already compacted from usage to date. As an existing farm track, the soil underlying this track will have become compacted over time by frequent use by farm vehicles / machinery, thus the soil underneath the track is highly unlikely to be suitable for tree root growth, due to its likely compacted nature. The Department for Communities and Local Government publication 'Tree Roots in the Built Environment (The Stationary Office, 2006)' provides guidance on soil compaction and tree root growth and states that: "*Pedestrian traffic and vehicle movement cause soil compaction. It is very important to realise that a major contribution to soil compaction occurs in the first pass of vehicles over the ground*". The track is a well-established track with a compacted aggregate wearing course, thus the soil underlying it will likely be compacted to a level that makes it non-conducive for root growth due to previous compaction damage. This compacted soil is very unlikely to become 'even more' compacted due to use by traffic using it for the cable installation works associated with the Proposed Development. As such, use of the track for the cable installation traffic will not be detrimental to the root system of the veteran tree T1124 and will not lead to a deterioration of the physiological functioning of the tree or the veteran habitat that the tree provides. The remainder of tree T1124's veteran buffer zone and RPA will be fenced off (during usage of the track as part of the Proposed Development), thereby protecting the unsurfaced parts of the buffer zone and RPA from traffic associated with the Proposed Development. **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** states that: "*If the track is to be upgraded or refurbished, these works shall be assessed by the Project Arboriculturist and appropriate mitigation measures will be specified and complied with*". The above is secured through **Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)** via Requirement 12 of Schedule 2 in the **Draft DCO (AS-008)**.
		Other Matters In its capacity as a District Council, NKDC will also comment on other local matters relating to noise and vibration, glint and glare, socio-economic issues, climate change and decommissioning. At this stage, these are considered to be important but potentially secondary to the principal matters outlined above, however, the Council will confirm its position through its LIR and WR. The Council will also make further comments on the applicant's assessment of cumulative impacts and on the potential cumulative impact of the development with other developments in the LIR and written representations. On BNG, the Council notes a current commitment to delivering 30% habitat units, 10% hedgerows and 10% watercourses. However, we note that the Examining Authority assigned 'great weight' (positive) in the overall planning balance in relation to EN010123 (Heckington Fen solar park) where a minimum of 65% BNG was committed to by Requirement. In	The Proposed Development will deliver BNG of 30% for Habitat Units, 10% for Hedgerow Units and 10% for Watercourse Units which shall be in place for 30 years. This is part of a wider package of appropriate landscaping and habitat proposals and new and improved hedgerows, as set out in the **Biodiversity Net Gain Strategy (APP-280)**, which will be suitably managed as set out in **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** and secured by a Requirement in Schedule 2 of the **Draft DCO (AS--008).** This would deliver significant beneficial improvements to habitats through BNG during operation, as set out in **ES Chapter 7 Ecology (APP-058).** The Applicant considers that this commitment, particularly in the absence of any existing target for Nationally Significant Infrastructure Projects ('NSIP's) to deliver BNG, should be afforded positive weight. 30% is a minimum target; the Applicant will seek to deliver gains above this if feasible, having regard to the purpose of the national infrastructure to generate and store electricity.

		addition to providing a robust approach to BNG calculations, as mentioned above, we would expect the applicant to be able to significantly exceed a minimum of10% BNG across all three habitat types within the Beacon Fen development, consistent with policy S14 Renewable Energy' of the CLLP which requires proposals for ground-based photovoltaics to be 'accompanied by evidence demonstrating how opportunities for delivering biodiversity net gain will be maximised'. The Council is minded to defer to other statutory agencies on technical matters where they hold primary responsibility for providing advice such as highway safety, public rights of way, minerals and waste, fire safety, surface water, flooding and drainage.	
		Draft Development Consent Order/s106 Agreement NKDC will provide detailed comments on the draft DCO and wishes to participate in an Issue Specific Hearing in relation to the drafting of the DCO. At this stage, the key issues include the scope of the authorised development, the wording of the draft requirements, the procedure for the discharge of requirements and the proposed fee schedule. The Council has some concerns around the unrestricted powers around tree lopping and felling that would be afforded under Article 43. Amendments to the draft Requirements in Schedule 2 are likely to be requested following the finalisation of the Council's LIR. The Council would also like to draw attention to the increase in planning fees that was introduced in April 2025 and requests that a proportionate increase is reflected in the draft fees set out in Schedule 16. The Council queries why the applicant is taking a markedly different approach to the fee schedule from other NSIP solar farms recently granted within Lincolnshire; or those currently in examination (including Springwell solar farm). The fee rates for the discharge of Requirements contained in Schedule 2 part 1 s23 of the draft DCO are significantly lower than (and at odds with) those precedents applied elsewhere, and in the Council's opinion are likely to underestimate the actual cost to the Council of discharging Requirements where the Council is the relevant planning authority. The Council will also seek an increase in the number of days available for considering further amendments as the timescale set out in Schedule 16 does not allow sufficient time for consultation. The Council has recently introduced fee charging for BNG monitoring on planning applications. It will seek to ensure that an appropriate fee is set for monitoring BNG, ecology and landscape mitigation works in respect of Beacon Fen Energy Park as the responsibility for this duty is likely to fall upon the Council. We expect that, as this will involve a financial element, a s106 Agreement will be required. In addition, consistent with its approach at Heckington Fen solar park (reference: EN010123) the Council will be seeking commitments to delivering a Skills and Education package which again we consider should engage a financial contribution. Finally, the Council and Lincolnshire County Council, suggest that setting up an Ecological Steering Group to manage the monitoring and mitigation of impacts arising not only from development at Beacon Fen but other NSIP projects within the District would be beneficial to coordinate mitigation where this may have wider benefits across a number of	Whilst Article 43 provides for the power to fell, lop and cut back roots of trees and shrubs, this is subject to the controls and restrictions contained within the Requirements contained within Schedule 2 of the **Draft DCO (AS-008)**. A CEMP is secured through Requirement 12 of the **Draft DCO (AS-008)**, which states that it must be substantially in accordance with **Appendix 2.4 Outline Construction Environmental Plan (OCEMP) (APP-077)**. The Applicant has agreed fees within the **Draft DCO (AS-008)** for the discharge of requirements and will reflect the latest position in the latest Statement of Common Ground ('SoCG') and **Draft DCO (AS-008)**. The Applicant awaits NKDC's fee estimates with regards to BNG monitoring and will consider this upon receipt. The Applicant has discussed the potential to join the Ecological Steering Group in a meeting with NKDC and LCC (14 August 2025) and is open to exploring this further. We understand this would meet once or twice per year but would need to understand heads of terms proposed.

		infrastructure projects. At present it is noted that there is no draft s106 Agreement nor heads of terms submitted with the proposals. The Council expect their views on the drafting and approvals process for DCO requirements, in particular, to be given significant weight in their role of ensuring that the impacts upon local environment and communities are minimised, and as an approving and enforcing authority.	
RR-012	National Grid Electricity Transmission Plc ('NGET')	NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights. **NGET infrastructure within/in close proximity to the proposed Order Limits:** NGET owns or operates the following infrastructure within or in close proximity to the proposed Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. Details of these electricity assets are as follows: - Substations Bicker Fen 400kV Substation and associated overhead and underground apparatus including cables - Overhead Lines 4ZM 400kV Overhead Line Bicker Fen – Spalding – North West Burton Bicker Fen – Walpole – West Burton **Protection of NGET Assets** As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew, repair and refurbishment such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGET assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. **Protective Provisions (including Compulsory Acquisition Powers)** NGET is aware that a form of protective provisions for the benefit of electricity undertakers has been included by the Applicant at Schedule 11 Part 1 to the draft Development Consent Order (the "Order") for the Project [APP-039].	The Applicant notes the comments made by NGET and the request for protective provisions to be included in the **Draft DCO (AS-008)**. The Applicant and NGET are in discussions regarding the appropriate form of provisions. The Applicant is confident that agreement will be reached, which will enable the representation to be withdrawn. However, in circumstances where it is not possible to reach agreement, the Applicant will put forward final proposed protective provisions to be included in the **Draft DCO (AS-008)** for the protection of NGET, making submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on NGET's statutory undertaking, and so satisfy the tests within section 127 of the Planning Act (2008).

		NGET considers the current form of Protective Provisions to be materially deficient. In particular, where the Applicant intends to acquire land or rights held by NGET compulsorily, to take temporary possession of the same, or otherwise interfere with any of NGET's interests in land, any powers authorising such acquisition, temporary possession or interference must only ever be exercised with the prior agreement and consent of NGET. A failure to secure such prior agreement risks compromising the safety and integrity of NGET's operational assets, in addition to inhibiting the proper discharge of NGET's statutory obligations and functions. This risk is particularly acute in the context of the Project, where the draft DCO includes rights to be compulsorily acquired and extinguished by the Applicant across NGET's 400kV Bicker Fen substation site, as set out in outline in Schedule 8 and summarised as follows: "The rights to construct, operate, maintain and use Works X (see below) and to construct operate maintain and inspect and access any protective works, utility apparatus or any other ancillary or related development…" Plot 18-13 – Work 5D and 5E Plot 18-14 – Work 5E (also Work 10) Plot 18-15 – Work 5E (also Work 10) Plot 18-16 – Work 5D and 5E Plot 18-17 – Work 5C, 5D and 5E Plot 18-18 – Work 5E Plot 18-19 – Work 4A, 5A, 5B, 5C and 5E Plot 18-20 – Work 4A and 10 Plot 18-54/18-57/18-53 - Access The land affected, which comprises Plots listed above (as shown on Sheet 18 of the Land Plans [APP-008]), is owned by NGET and also comprises a 400kV substation and overhead line, along with ancillary infrastructure including fibre cables and underground cables. It is essential that proposals do not prevent NGET from being able to fulfil its statutory duties to operate and maintain assets and connect customers at this site. As currently drafted, the Protective Provisions permit the unfettered exercise by the Applicant of powers of compulsory acquisition and/or temporary possession over NGET land. NGET considers that in the absence of adequate Protective Provisions to protect NGET's statutory undertaking, the inclusion of compulsory powers across NGET land is likely to significantly impact on NGET's ability to discharge its statutory duties at a critical location in the electricity transmission network. NGET is in discussions with the Applicant on the form of Protective Provisions, noting the established line of precedent which supports the position adopted by NGET (and, indeed, other statutory undertakers) as to the need for a restriction on the actual exercise of powers of compulsory acquisition and/or temporary possession across NGET land. It is therefore essential that the Protective Provisions contain the consent mechanism noted above and, in doing so, enable NGET to continue to deliver planned reinforcements to the electricity transmission network and to accommodate connection requests received from electricity generation customers. NGET will continue to liaise with the Applicant in relation to the Protective Provisions, along with any supplementary agreements which may be required. In the absence of an agreed form of Protective Provisions, NGET strongly objects to the compulsory acquisition, temporary possession of, or interference with, its assets, land or rights over its land.	

		Furthermore, the Applicant is seeking compulsory purchase powers over plot 4-06 which includes NGET's 4ZM 400kV overhead line. Where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land, NGET will require further discussion with the Applicant and NGET will require its standard Protective Provisions to be included within the Order. **Next Steps:** NGET will continue to liaise with the Applicant with a view to reaching agreement on the matters documented above as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	
RR-006	Environment Agency	**EA01 Temporary Bridge Design** Drawing / Plan 2.17: Illustrative Temporary Bridges over Watercourses [APP-023] Issue: This section shows the bridge abutments at only 1 metre from the bank top. Impact: This design encroaches on the riparian zone resulting in a loss of riparian habitat and a loss of connectivity. Flood risk could be increased if bridges and crossings are not designed appropriately. Solution: A minimum 10 metre buffer should be provided between the development or any fences, and any watercourse or ditch, to allow for natural movement of riparian mammals up and down the system. Set bridge abutments at least 1 metre from bank top. Raise bridge approach, soffits and deck above the floodplain to allow riparian connectivity and to allow watercourse to come out of bank if necessary. Demonstrate how any loss of floodplain from abutments and ramps will be compensated for. All parapets and railings need to be permeable and open as possible with a minimum 100mm spacing. Additional comments: This approach is supported by paragraph 5.4.22 of National Policy Statement (NPS) EN-1, which states that "The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure" and paragraph 2.10.86 of NPS EN-3, which states that "sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses." Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100) Annual Exceedance Probability (AEP) scenario can be used. It will be important to compare the proposed bridge designs against the outputs of the baseline hydraulic modelling to confirm that there will be no interaction with flooded areas and loss of floodplain storage. Where it is necessary for ramps to be placed in the defended design flood extent, the impact of these on flood risk should be tested within the hydraulic model, including a blockage sensitivity check, and quantified within the Flood Risk Assessment (FRA). If impacts to third parties are noted, then appropriate measures should be put in place to ensure these are mitigated for. **EA02 Permanent Bridge Design** Drawing / Plan 2.18: Illustrative Permanent bridge designs for Bridges over Watercourses [APP-024] Issue: The design of permanent bridges encroaches on the riparian zone of the watercourse corridor and ramps	**Bridge Design** In May 2024, the Applicant emailed Black Sluice Internal Drainage Board ('IDB') regarding the prospect of introducing a permissive path to extend the current PRoW along the River Slea, which included the addition of pedestrian footbridges. The Applicant shared three plans showing the local area on the Main River Map, and the local area on Black Sluice's Map of District highlighting the ditches in question. The Applicant also attached a KMZ file showing the potential crossing locations. In July 2024, Black Sluice IDB confirmed they had no particular issue regarding installing a footbridge over Carr Dyke, but explained that any structure would need the consent of the Board under Section 23 Land Drainage Act 1991 and the bridge would need to be a freespan bank top-to-bank top structure i.e. with no supporting structures such as pillars in the middle of the watercourse. **Plan 2.18: Illustrative Permanent bridge designs for Bridges over Watercourses (APP-024)** was designed incorporating this advice. The draft indicative bridge design was later shared with the Environment Agency ('EA') in August 2024, with the Applicant requesting feedback, specifically on whether there would be any objection from the EA on introducing new bridges or whether there would be any specific requirements regarding the construction and maintenance of such bridges / ditches. The EA responded that, having reviewed the design of the proposed footbridges, there is potential for these works to be exempt from a permit but provided no comments on the design itself. Post-DCO consent and prior to any relevant works commencing on site, all appropriate permits would be applied for and secured from the EA, as explained further in the **Other Consents and Licences Statement (APP-276)**. <u>Watercourse Buffer</u> The Applicant notes that the Biodiversity Net Gain Guidance defines the riparian zone for ditches to be 5m from the bank top. The water vole and otter survey results, which are included in **ES Chapter 7 Ecology (APP-058)** for the Solar Array Area, classed all surveyed watercourses within the Solar Array Area as being sub-optimal or unsuitable for water vole and otters and, in addition, no evidence of either species was record within the Solar Array Area. As stated in **ES Chapter 7 Ecology (APP-058)** and the Water Vole Mitigation Handbook, page 22, section 4.3.1: to avoid impacts on water voles a buffer zone should be set up "*around a watercourse / wetland habitat to ensure that burrows are not affected (the size of the buffer zone will be dependent on the nature of the works and the likely extent of burrows, but is likely to be in the region of 3-5m from toe of bank).*" **ES Chapter 7 Ecology (APP-058)** and **Appendix 2.3 Embedded Mitigation (APP-076)**, page 4, reference EM2 under the topic of "buffers" states: "*Buffers (at least 5m) will be set up around all ditches (except where crossings are required). […] A minimum 5m*

		could potentially be present within the floodplain. Impact: Reduced lateral and longitudinal connectivity for aquatic ecology, and loss of riparian habitat and connectivity. Flood risk could be increased if bridges and crossings are not designed appropriately. Solution: The abutments / supports of the bridge should be designed and positioned to not be intrusive to the riparian zone to allow free passage of fish. A minimum 10 metre buffer should be provided between the development or any fences, and any watercourse or ditch, to allow for natural movement of riparian mammals up and down the system. Set bridge abutments further back from bank top. Raise bridge approach, soffits and deck above the floodplain to allow riparian connectivity and to allow watercourse to come out of bank if necessary. Additional comments: This approach is supported by paragraph 5.4.22 of NPS EN-1, which states that "The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure" and paragraph 2.10.86 of NPS EN-3, which states that "sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses." Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) AEP plus higher central climate change scenario. For any permanent crossings, considering a proposed design life of the development of 40 years we would recommend using the 2080's epoch for climate change. Further details on climate change uplifts for watercourse (fluvial) flows can be found online at: Flood risk assessments: climate change allowances - GOV.UK It will be important to compare the proposed bridge designs against the outputs of the baseline hydraulic modelling to confirm that there will be no interaction with flooded areas and loss of floodplain storage. Where it is necessary for ramps to be placed in the defended design flood extent, the impact of these on flood risk should be tested within the hydraulic model and quantified within the FRA. If impacts to third parties are noted, then appropriate measures should be put in place to ensure these are mitigated for.	*offset from all infrastructure (including fencing) from bank top of all riparian boundaries and watercourses; […] Minimum of 9m buffer from waterbodies*." The 5m buffer is therefore consistent with the upper recommended buffer from the Water Vole Mitigation Handbook. In addition, the Applicant confirms that all watercourses will have a 9m buffer (except at crossings) within which there will be no infrastructure, such as fences, which would impede access or movement. <u>Bridge Design & Flood Levels</u> The soffit level of all temporary bridge crossings will be situated above the 1% Annual Exceedance Probability ('AEP') flood level. The soffit level of all permanent bridge crossings will be situated above the 1% AEP flood level including an allowance for climate change. The design flood level will be confirmed based on the bespoke fluvial flood model prepared as part of **ES Appendix 11.1 Flood Risk Assessment (APP-162)**. The model is currently awaiting sign-off by the EA. The final model results shall then be used to 'test' the impact of the proposed crossings on fluvial flooding within the wider catchment. Where there will be small losses of floodplain storage as a result of the structures, mitigation in the form of floodplain compensation will be provided as detailed in **Appendix 11.1 Flood Risk Assessment (APP-162)**. This is secured through Requirement 5 in Schedule 2 to the **Draft DCO (AS-008)**.
		EA03 Use of culverts Drawing / Plan 2.19: Illustrative Culvert crossing cross-section views [APP-025] Issue: Illustration appears to show multi-pipe culverts proposed for drainage connectivity culverts, to allow conveyance of water from one side of access track to the other. However, it is unclear whether these designs are also being considered for watercourse crossings. Impact: Multi-pipe culverts can lead to backing up of flow during high volume events. Culverting of any kind can interrupt sediment and water flow pathways. Solution: Avoid use of culverts – use water crossing hierarchy, open span crossings with set-back abutments preferred for all uses (permanent and temporary). If open span not suitable, then arched or 3 sided culverts, which do not interfere with the channel bed and allow passage of water and sediment downstream are the next best choice. Where existing culverts/piped crossings are to be upgraded, the hierarchy should also apply. Additional comments: We are opposed to the culverting of any	The watercourse crossing design will be confirmed at the detailed design stage and will follow the water crossing hierarchy so far as possible. The most appropriate design will be selected based on ground investigations for each proposed culvert and the design will ensure that the capacity of all culverts will be sufficient for the design storm event. The dimensions will be confirmed at the detailed design stage. Whilst **Figure 2.19 Illustrative Culvert crossing cross-section views (APP-025)** does show a double culvert, the drawing states that a: "*single culvert pipe is generally preferred by the Environment Agency, Lead Local Flood Authorities and Internal Drainage Boards*". This culvert designs will be secured though Requirement 5 of the **Draft DCO (AS-008)** and through pre-application discussion with the EA in regard to the requirement for Flood Risk Activity Permits, as discussed in **Other Consents and Licenses Statement (APP-276)**.

		watercourse because of the adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts. Watercourses are important linear features of the landscape and should be maintained as continuous corridors to maximise their benefits to society. We encourage the restoration of culverted watercourses to open channels. This approach is supported by NPS EN-3 (paragraphs 2.10.87-2.10.88). The Applicant should be following the hierarchy of clear span bridges with set-back abutments, 3-sided/arched culverts, and then, only with clear justification that culverting is unavoidable, piped/circular/box culverts of appropriate size, with an invert burial depth of 300mm below the active base of the watercourse and integrated mammal ledge. Replacing box culverts/piped crossings with less intrusive methods could also result in an uplift of Biodiversity Net Gain (BNG) score and assist in meeting Water Framework Directive (WFD) or Water Environment Regulations objectives.	
		EA04 Protection of fish Environmental Statement, Chapter 7: Ecology [APP-058].Table 7.7 Issue: Legislative protection afforded to spined loach, an Annex II species under the Habitats Directive, not listed and only protected fish species have been considered. Impact: The significance of impacts may not be fully considered and there is a risk that impacts on fish species making up the biological quality element of WFD status will not be assessed. Solution: Spined loach should be listed in Table 7.7. Other coarse fish species that maybe present within the order limits and form part of the biological quality element of WFD should also be considered in Table 7.7.	The Applicant will update Table 7.7 of **ES Chapter 7 Ecology (APP-058)** by Deadline 2 using the EA Ecology and Fish Data Explorer for the appropriate operational catchment(s), considering spined loach and other notable species.
		EA05 Watercourse buffers Environmental Statement, Chapter 7: Ecology [APP-058]. Paragraph 7.6.4 Environmental Statement, Appendix 2.3 Embedded Mitigation [APP-076] Issue: Insufficient buffer around watercourses Impact: Increased opportunity for pollutant and fine sediment runoff to enter watercourses, loss of riparian habitat and subsequently lateral connectivity, disturbance to fish species. Solution: Best practice would be to avoid the riparian zone, which is defined as 10m from bank top under guidance for BNG. Additional comments: Section 7.6.4 states numerous buffers from watercourses and waterbodies. This issue extends to other documents too including the Outline Construction Environmental Management Plan (oCEMP) and Outline Landscape and Ecological Management Plan (oLEMP). A buffer strip of at least 10 metres is recommended in Table 4-3 of the Preliminary Ecological Appraisal in Appendix 7.3 of the ES [APP-092] (see 'Running Water'). This is supported by paragraph 2.10.83 of NPS EN-3.	<u>Watercourse Buffers - Clarification</u> The Applicant has agreed to incorporate a buffer to watercourses, to be kept free from development. As a point of clarification regarding the watercourse and waterbodies buffers, the Applicant confirms that the following buffers are incorporated within the development design (except where crossings are required) and secured via Requirement 5 of the **Draft DCO (AS-008)**: • Minimum 5m buffer to all watercourses and waterbodies, within which there will be no development; and a • Minimum 9m buffer to all watercourses and waterbodies, within which there will be no new infrastructure that would impede access to the watercourse or waterbody. New infrastructure that does not impede access to the watercourse can be located within the 9m buffer, but there are restrictions of where this new infrastructure can be located. <u>Watercourse Buffers - Justification</u> The EA was consulted formally by PINS on the Applicant's Scoping Request (**Appendix 1.1 Scoping Report (APP-071)**) and **Appendix 1.2 Scoping Opinion APP-072)**) as part of the pre-application process. The EA stated that a buffer zone of 8m from any watercourse or asset would be desirable. The EA's response was noted by the Applicant and, following consultation with the Black Sluice IDB, a buffer of 9m has been applied to watercourses within which there will be no

			infrastructure, such as fences, which would impede access or movement. This is secured via Requirement 5 of the **Draft DCO (AS-008)**. In response to the suggestion within EA05 that the watercourse buffer zone be increased to 10m to align with the riparian zone considered under Biodiversity Net Gain guidance for protected species, the Applicant notes that the Biodiversity Net Gain Guidance defines the riparian zone for ditches to be 5m from bank top. The water vole and otter survey effort that is included in **ES Chapter 7 Ecology (APP-058)** for the Solar Array Area classed all surveyed watercourses within the Solar Array Areas as being sub-optimal or unsuitable for water vole and otters and, in addition, no evidence of either species was recorded. As stated in **ES Chapter 7 Ecology (APP-058)** and the Water Vole Mitigation Handbook, page 22, section 4.3.1: "*protecting a buffer zone around a watercourse / wetland habitat to ensure that burrows are not affected (the size of the buffer zone will be dependent on the nature of the works and the likely extent of burrows, but is likely to be in the region of 3-5m from toe of bank).*" **Chapter 7 Ecology (APP-058)** and **Appendix 2.3 Embedded Mitigation (APP-076)**, page 4, reference EM2 under the topic of "buffers" states: "*Buffers (at least 5m) will be set up around all ditches (except where crossings are required). […] A minimum 5m offset from all infrastructure (including fencing) from bank top of all riparian boundaries and watercourses; […] Minimum of 9m buffer from waterbodies*." The 5m buffer is therefore consistent with the upper recommended buffer from the Water Vole Mitigation Handbook. It is noted that with the existing land uses across the Site, the watercourses currently have much less than the 5m buffer proposed, and will receive sediment and chemical input from regular farm activities including ploughing, drilling, fertiliser/pesticide input. <u>Summary</u> In conclusion, no development or temporary storage of materials (except at watercourse crossings with appropriate consent as per **Other Consents and Licences Statement (APP-276)**) will be allowed within 5m of any watercourse, and only new infrastructure that will not affect access by Black Sluice IDB / EA access to their assets will be allowed within the 5 to 9 m distance from watercourses. The adherence to the buffers will be secured though Requirement 5 (detail design approval), Requirement 12 (Construction Environmental Management Plan) and Requirements 18 (Decommissioning and restoration) of the **Draft DCO (AS-008)**.
		EA06 Drain downs – risk to fish Environmental Statement, Chapter 7: Ecology [APP-058]. Paragraph 7.6.17 Environmental Statement, Appendix 2.3 Embedded Mitigation [APP-076] Issue: Draining down of watercourses that are suitable for fish. Impact: Risk to protected species. Solution: Where there is suitable habitat for fish, trenchless techniques should be prioritised. We object to unnecessary drain downs of watercourses that have fish habitat present. Additional comments: Spined loach and European eel will be present in watercourses all year round and could still be harmed by drain downs outside of migration windows. Furthermore, spined loach do not undertake migrations in the same sense that European eel do, so a timing commitment is not suitable for spined loach. Impacts include (but are not limited to), loss of habitat, damage to spawning gravels and fish eggs, loss	The Applicant has provided further details on the mitigation within the updated **Appendix 2.4 outline Construction Environmental Management Plan (APP-077)** submitted at Deadline 1. This mitigation includes (where appropriate): pre-works habitat assessment with bed profile, trapping out in cofferdams, mesh specifications, and treatment of water prior to reintroduction to the watercourse. Where habitat assessments are undertaken, the results of these will be used to inform decisions on the type of water course crossing used.

		of connectivity, entrainment/impingement of fish into pump, increased sedimentation downstream. Given the above comments, we currently disagree with the conclusions met in paragraphs 7.6.61 and 7.6.62. This approach is supported by paragraph 5.4.35 of NPS EN-1.	
		EA07 Typographic error Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Paragraph 11.5.5. Issue: This paragraph describes Table 11.7 as presenting "the temperature change in precipitation". Impact: Minor impact although the reporting should be updated to avoid confusion Solution: Please correct the text within paragraph 11.5.5. We assume it should read "Table 11.7 presents the projected change in temperature".	**ES Chapter 11 Water Resources and Flood Risk (APP-062),** paragraph 11.5.5, should read: "*Table 11.7 presents the percentage change in temperature for the 90th percentiles for the four emission scenarios for winter and summer periods for the available time slices*".
		EA08 Consumptive water use Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Section 11.6. Issue: Section 11.6 of the Water Resources and flood risk chapter identifies consumptive uses of water during construction and operational phases. One water demand described elsewhere in the report is missing from this section, horizontal directional drilling which we understand requires continuous water supply for drilling fluids. Impact: Groundwater abstraction may be closed to new licences and surface water abstraction licences can be restricted by flow conditions to periods outside of the summer season, which could have significant impacts on the project's programme. Solution: Include Horizontal Directional Drilling (HDD) as a consumptive use of water. We also recommend that in addition to the consideration shown in the ES, a more detailed water supply strategy accompanies the Construction Environmental Management Plan (CEMP) and provides an options appraisal for the practical implications of the different sources supply when available. Additional comments: This is supported by paragraph 5.16.7 of NPS EN-1. The EA is satisfied that water supply has now been considered as part of the ES and we are pleased to see sources of supply considered in this section. If volumes are not known or if on site logistics or locations are subject to detailed design phase, we accept that a more detailed appraisal of these options may not be possible yet. However, problem solving these can be done with review of the catchment abstraction licensing strategy. This may then inform the detailed design phase if temporary on-site storage is proposed to mitigate for this. Additionally, tankering water will increase the numbers of HGVs on local roads.	**ES Chapter 11 Water Resources and Flood Risk (APP-062)** will be updated to include reference to the consumptive use of water for Horizontal Directional Drilling ('HDD') by Deadline 3. As part of the Applicant's ongoing works regarding water demand, a Water Demand and Options Appraisal report is being prepared. The report will consider the consumptive use of water for trenchless techniques (including HDD). This report will be submitted into examination by Deadline 3. The construction phase detailed CEMP, which is secured by Requirement 12 in the **Draft DCO (AS-008)** will include details of and provide environmental management measures appropriate to the water supply option(s) which are determined to be suitable for the Proposed Development. The **Other Consents and Licenses Statement (APP-276)** includes Water Abstraction or Impoundment Licenses, which are required prior to commencing the abstraction or impoundment of groundwater pumping/ dewatering as appropriate. An application would be submitted prior to construction if required by the contractor for dewatering (pumping water from excavations) and if required, to be applied for prior to any new or modified water abstraction.
		EA09 CSM – data sources Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Paragraphs 11.6.3 to 11.6.12 Issue: Data sources not given for the Conceptual Site Hydrogeological Model. No conclusions presented. Impact: Model is of limited value if data cannot be checked and conclusions are not presented. Solution: Include data sources and a discussion of conclusions from the model Additional comments: This is a baseline Conceptual Site Hydrogeological Model. The factual data appear	The qualitative Conceptual Site Hydrogeological Model included in **ES Chapter 11 Water Resources and Flood Risk (APP-062)** Section 11.6 is designed to facilitate technical understanding of the baseline, identify source-pathway-receptor linkages and ultimately identify receptors that have pathway linkages with the Proposed Development and are therefore 'At Risk' of the Proposed Development. Therefore, the conclusion of the Conceptual Site Hydrogeological Model ('CSM') is presented in Table 11.11 Summary of Receptors and Sensitivity, which identified which receptors were determined to be require further assessment.

		to be relevant, but no sources (such as depth to groundwater) are given, and no conclusions are presented.	The data sources of information used in the baseline and CSM are provided as footnotes.
		EA10 Drainage scheme Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Paragraphs 11.6.22. Issue: Disposal of foul water and trade effluent still unconfirmed due to awaiting detailed design stage. It remains unclear if a water discharge activity permit will be required. Impact: Discharge of foul water from welfare and trade effluent from used firewater/cooling system can increase risks to water quality, even if it is treated in a package treatment plant. Solution: We request to be consulted on the drainage scheme to be approved under Requirement 10. Additional comments: If treatment and discharge at the site is required, the Applicant should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures. It is recognised that sections 11.2.4 and 11.7.6, it lists "GPP4 Treatment and disposal of wastewater where there is no connection to the public foul sewer" as guidance intended to prevent adverse impacts during construction.	The Applicant is not proposing any foul water discharges from welfare or trade effluent discharges from used firewater/cooling system. Therefore, there will be no requirement for discharge permits for these activities. If the Applicant identified the need for other trade effluent discharge permits, these will be sought, as discussed in the **Other Consents and Licenses Statement (APP-276)**. Waste management procedures (including the disposal of trade effluent and / or foul water via tankering if required) shall be included in the CEMP and DEMP, which are secured though Requirements 12 and 18 of the **Draft DCO (AS-008)**. The drainage design, including foul water, is secured through Requirement 10 in Schedule 2 to the **Draft DCO (AS-008)**. The Applicant considers that the Draft DCO includes adequate provisions to allow the local planning authorities ('LPA's) to enforce against requirement and ensure agreed measures are adhered too. The Applicant considers that the LPAs have adequate expertise to consider and agree the drainage design. Nevertheless, the LPA would be able consult with the EA at its own discretion during the determination of the requirement should it determine the EA's input is required.
		EA11 Fuels and oils – risk to groundwater Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Paragraphs 11.6.28 and 11.6.29 Issue: Conceptual model of groundwater does not allow for free-phase or dissolved phase contaminants. Impact: Potential for insufficient mitigation to prevent downward migration of fuel and oil directly into secondary A aquifer. Solution: Ensure mitigation is in place and explicitly mentioned. Additional comments: This section identifies potential contamination associated with vehicles / machinery to include fuel and oil that could infiltrate through soils and superficial deposits to contaminate aquifers. 11.6.29 states that "groundwater is conceptually at low risk from sediment, as the water is filtered as it percolates down, likely removing the fine sediment." Fuel and oil will likely be free-phase or dissolved in water, and its migration may not be filtered or impaired as it percolates. Some areas of the site are directly underlain by secondary A aquifer with shallow groundwater, or risk of groundwater flooding, so there is no capacity for water to "filter" prior to interacting with groundwater.	The pollution prevention mitigation measures are already included within **Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)**. As part of the **Appendix 2.4 oCEMP (APP-077)** update for Deadline 1, pollution prevention measures in regard to free-phase and dissolved phase contamination will be reviewed and updated, as appropriate. A detailed version of the CEMP is secured by Requirement 12 in Schedule 2 to the **Draft DCO (AS-008)**.
		EA12 CSM – fire water and thermal effects Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Paragraph 11.6.34 Issue: Fire water and thermal effects of buried cables omitted from potential contaminant sources in the Operational Phase Conceptual Site Hydrogeological Model. Impact: Omission from the model may mean these contaminants are not adequately considered. Solution: Include these contaminants in future revisions of the model, and any conclusions and mitigation based on this model. Additional comments:	The Applicant acknowledges the EA's comments on this emerging topic and **ES Chapter 11 Water Resources and Flood Risk (APP-062)** will be updated to include its consideration for Deadline 3.

		Underground electrical cables generate heat that dissipates naturally to the surrounding ground during power transmission. The levels of heat loss and dissipation will be dependent on numerous factors including cable design, soil structure, transmission voltage and engineering design. Where underground cables interact with groundwater bodies this could result in local degradation of groundwater quality and negatively impact nearby abstractions via the generation of a heat plume. Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023. We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating and cooling systems, but there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables. The EA's Chief Scientist's Group has published a report for Ground Source Heating and Cooling (GSHC) systems (Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems). In this study, a 'thermal plume' was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an equivalent benchmark could be considered when assessing heat pollution from underground HV cables. The Chief Scientist's Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means. At this stage we are asking applicants to consider the potential thermal implications of buried cables, in relation to risks to groundwater, via desk-based assessment. We recognise that as this an emerging issue, this matter has not been raised previously within the pre-application stages for this project.	
		EA13 Unsuspected contamination Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Table 11.12. Issue: No reference to encountering previously unknown contamination in this table. Impact: We consider that any of the activities in this table could lead to encountering previous unknown contamination. Solution: Embedded mitigation for this should be proposed. Additional comments: We note that unexpected contamination is covered elsewhere in the documents, however it would be pertinent for the matters to be discussed in this table to avoid it being overlooked.	**Appendix 2.4: oCEMP (APP-077)** includes reference to contingency procedures being in place for the eventuality that unexpected contamination is encountered during construction. These will comprise a 'stop protocol', testing and risk assessment, followed by the implementation of any remediation or additional protection measures identified to be necessary by this process. A detailed version is secured through Requirement 12 in Schedule 2 to the **Draft DCO (AS-008).** **ES Chapter 11 Water Resources and Flood Risk (APP-062)** Table 11.12 will be updated to include consideration of previously unknown contamination for Deadline 3.
		EA14 Concrete spills Environmental Statement, Appendix 2.4 Outline Construction Environmental Management Plan [APP-077]. Tables 4.2 and 4.3 Issue: Insufficient detail given about disposal of concrete washing water and actions in the event of spillage Impact: Site workers may not be aware of the correct actions, which poses a risk to controlled waters. Solution: Ensure sufficient detail is given in the oCEMP.	**Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)** has been updated for Deadline 1 with the necessary additional pollution control measures for concrete.

		Additional comments: For the source “Washing out and cleaning of concrete batching plant or ready-mix lorries” we agree with the measures suggested, but no instruction is given here or in Table 4.3 about how captured water should subsequently be disposed of. For the source “Concrete spills during site transportation”, the control measures are designed to stop this happening but give no actions to take if it does happen. Site workers may be unaware of actions to take if concrete does spill.	
		EA15 Dewatering permits Environmental Statement, Appendix 2.4 Outline Construction Environmental Management Plan [APP-077]. Paragraph 6.11.10. Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Table 11.12. Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 7.5.1. Issue: No mention of EA permit or exemption requirements for dewatering. Impact: The potential need for permits may not be acknowledged by contractors. Solution: Ensure the need for permits or exemptions is acknowledged. Additional comments: We note that dewatering is listed in 5.4 Other Consents and Licences Statement [APP-276], but it would be pertinent for the matter to be discussed in the oCEMP to prevent it being overlooked.	**Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)** has been updated for Deadline 1 with the relevant detail on permits and exemptions.
		EA16 Removal and disposal of road material Environmental Statement, Appendix 2.5: Outline Decommissioning Environmental Management Plan [APP-078]. Table 1.1. Issue: It is assumed that the road will be removed, but it is possible that engagement with landowners will establish a preference for it to be retained. Impact: Risk that material remains on site or is not disposed of properly. Solution: Put processes in place to prevent this and provide clarity on how material will be removed. Additional comments: other large scale infrastructure providers in this area have failed to remove fully compounds and haul roads or have removed the material and then piled it in field corners, often stating the landowner will make use of it later. Contractors have also tried passing the material off as ‘virgin’. The haul road alone could need approximately two 8-wheel tipper loads to be removed, every day, for 3 years.	As stated within **Appendix 17.2 Waste and Recycling Strategy (APP-189),** the lifespan of the Proposed Development is anticipated to be 40 years, therefore it is not possible (at this stage) to identify either the waste management routes or specific waste facilities to be utilised during the decommissioning of the Proposed Development. Requirement 18 in Schedule 2 to the **Draft DCO (AS-008)** secures that, prior to decommissioning, a detailed DEMP must be prepared for approval by the relevant planning authority. The detailed DEMP must be substantially in accordance with the **Appendix 2.5 Outline Decommissioning Environmental Management Plan (APP-078)**. Any waste generated from decommissioning at the end of life will be managed in accordance with the waste management plan prepared as part of the detailed DEMP. It is expected that waste from the Bespoke Access Road, if removed, will be treated locally or will be reused in accordance with the waste hierarchy. It is not expected to have a significant impact upon local waste management facilities and waste capacity.
		EA17 Leaving cables in-situ Appendix 2.5 Outline Decommissioning Environmental Management Plan (oDEMP) [APP-078] Paragraphs 1.4.11 and 1.5.3. Environmental Statement, Chapter 2: Proposed Development [APP-053]. Paragraph 2.15.22. Environmental Statement, Chapter 11: Water Resources and Flood Risk [APP-062]. Table 11.14. Issue: Proposal to leave cables and foundations in situ at decommissioning has not been adequately assessed with respect to groundwater and land contamination. No allowance for identifying previously unknown contamination during decommissioning.	The text referred to at EA17, at paragraph 2.15.11 of **Chapter 2 Proposed Development (APP-053)**, is under the sub-heading ‘Solar Array Area’ and relates to cables within the Solar Array Area only. The subsequent paragraph referred to in the Relevant Representation relates to the 400kV Cable Route, which will be left in situ. The **Draft DCO (AS-008)** does not propose for this to be removed. Table 11.14 of **Chapter 11 Water Resources and Flood Risk (APP-062)** sets out the potential impacts related to decommissioning, considering the removal of cables within the Solar Array Area as a worst-case scenario, in accordance with EIA best practice. It is considered that the potential effects of the removal of the cables (and associated construction works) are likely to be greater than any effects of it remaining in-situ. Leaving cables in-situ is an established practice within the

		Impact: Potential residual long-term risk to groundwater and land as materials break down. Solution: Provide full details of the assessment made regarding the long-term impacts on groundwater and land. We recommended an allowance and outline plan for removing all cables and other below ground infrastructure should be made in case this is the best practice guidance at the time of decommissioning. Include details in Outline Decommissioning Environmental Management Plan (oDEMP) for actions to take in the event of identifying previously unknown contamination during works. Additional comments: Paragraph 2.15.22 of the ES, Chapter 2: Proposed Development [APP-053] states that each environmental topic has considered the option of removal or remaining in situ that represents the worst-case scenario relevant to the respective topic under consideration. It then goes on to state that "The 400kV cable will not be removed as part of the decommissioning phase and will, instead be made safe and remain in situ". In Chapter 11, we have not identified any discussion or consideration of the potential impacts of leaving foundations and cables in situ versus removal. While current assessments indicate that the most favourable option will be for the cables to be left in situ, this may not be the case at the time of decommissioning. Contamination may have leached onto site during the operational phase or may be identified in previously unexcavated areas (lateral and vertical). Similar controls to those presented in the oCEMP should be considered.	industry. Therefore, assessment of the impacts of leaving the cables in-situ is not required, nor would it be proportionate.
		EA18 Monitoring risks to water environment Environmental Statement, Appendix 2.5: Outline Decommissioning Environmental Management Plan [APP-078]. Section 2.7. Issue: Section 2.7 is titled "No monitoring is proposed during decommissioning. Water Resources & Flood Risk" Impact: Unacceptable risk to controlled waters if no monitoring is proposed. Solution: Review relevant section and confirm if this is a formatting error. Additional comments: It appears that what should be Section 2.6.5, discussing Monitoring requirements for Noise & Vibration, has become merged with the section header for 2.7 Water Resources & Flood Risk. For the avoidance of doubt, confirmation is required. We note that monitoring relating to Water Resources & Flood Risk is detailed in sections 2.7.12 and 2.7.13.	This is a formatting error. **Appendix 2.5 Outline Decommissioning Environmental Management Plan (oDEMP) (APP-078)** has been revised to clarify for Deadline 1.
		EA19 Wash water Environmental Statement, Appendix 2.5: Outline Decommissioning Environmental Management Plan [APP-078]. Paragraph 2.7.11. Environmental Statement, Appendix 2.4 Outline Construction Environmental Management Plan [APP-077]. Paragraph 4.4.1. Issue: No controls on discharge of untreated wash water directly into ground (underlying aquifers) are proposed. Impact: Potential risk to groundwater. Solution: Include mitigation to prevent direct discharge of untreated wash water into ground. Additional comments: It is stated that "All washing down of vehicles and equipment will take place in designated areas and wash water will be	**Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)** and **Appendix 2.5 Outline Decommissioning Environmental Management Plan (oDEMP) (APP-078)** has been updated for Deadline 1 to cover mitigation measures in respect of wash water.

		prevented from passing untreated into watercourses". However, prevention of water passing untreated into ground is not stated. The same should apply to paragraph 4.4.1 the oCEMP, which states "Liquid wastes pertaining to runoff from material storage areas and from wet methods of preparation should never be released directly into surface waters or surface waters drains without prior approval from the relevant regulatory bodies".	
		EA20 Otter & water vole Environmental Statement, Appendix 6.7 – Outline Landscape and Ecological Management Plan. [APP-089] Issue: In relation to Protected Species Enhancement Measures neither otter nor water vole are mentioned. Impact: Risk to protected species. Solution: As stated in the Preliminary Ecological Appraisal further surveys need to be conducted across the Order Limits for water vole and otter. If present, mitigation plans will need to be agreed with the EA and Natural England for these species.	The Applicant is of the view that Protected Species Enhancement Plans for water vole and otter is not proportionate. Surveys have been undertaken across the Proposed Development for water vole and otter (see **Appendix 7.9 Riparian Mammals Report (APP-098)** and **Appendix 7.19 Riparian Mammal Survey Report Cable Route and Access Road Parts 1-4 (APP-108 to APP-111)**). The water vole and otter survey effort that is included in **ES Chapter 7 Ecology (APP-058)** for the Solar Array Area classed all surveyed watercourses within the Solar Array Areas as being sub-optimal or unsuitable for wale vole and otters and, in addition, no evidence of either species was recorded. The Applicant has committed to undertaking pre-commencement water vole and otter surveys. If the presence of these species is identified, then management plans and protection measures will be integrated into works method statements. This may include an application for protected species licence(s) to the appropriate licencing organisation(s). This will be secured though the Requirement 12 (CEMP) of the **Draft DCO (AS-008)**.
		EA21 Flood risk – works to substation Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraphs 2.2.2, 4.1.9, 5.3.25 and 6.2.15. Issue: Clarity required on whether FRA includes impacts from development described under Work No. 5 Impact: Risk of flooding to development and/or increased risk to others. Solution: Please provide clarity as to whether and how the FRA is considering these works. Additional comments: It is noted that extension works to Bicker Fen substation are required but will be dealt with by National Grid through a separate consent. Paragraph 6.2.15 notes that any impact on flood flows and floodplain storage resulting from the extension will be managed by National Grid, and paragraph 6.3.6 assumes that any update undertaken by National Grid will ensure there are no impacts on pluvial flooding. However, in Schedule 1 of the Draft DCO, Work no. 5 describes notable works to the existing sub-station, which do not appear to be assessed in detail within the FRA.	The **Draft DCO (AS-008)** includes extension works to Bicker Fen substation which are required to accommodate the connection of Beacon Fen Energy Park into the grid. Work No. 5 of the **Draft DCO (AS-008)** is subject to detailed design. **Appendix 11.1 Flood Risk Assessment (APP-162)** has assumed that all substation works will be designed and constructed fully in accordance with the relevant National Grid design manual/technical specification regarding substation flood resilience/protection. On this basis, it is considered that there will be no adverse impacts as a result of these works. Further detail will be provided pursuant to Requirement 5 (Detailed design approval) and Requirement 10 (Surface and foul water drainage) of the **Draft DCO (AS-008)**. These Requirements state that any measures will be submitted to and subject to approval by the relevant planning authority. This is in line with the approach for Heckington Fen Solar Park, which is a consented scheme.
		EA22 Updates to flood mapping Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 5.3.1. Issue: The Flood Map for Planning has since been updated (March 2025). Impact: Although inspection reveals no notable changes in flood extent in the vicinity of the proposed development but needs amending for completeness. Solution: Please refer to the latest updated version of the Flood Map for Planning in the final version of the FRA.	A bespoke fluvial flood model was produced as part of **Appendix 11.1 Flood Risk Assessment (APP-162)**. It is intended that the results of this model will inform the assessment of fluvial flood risk. Notwithstanding this, any references to the Flood Map for Planning will refer to the latest version of the dataset within an updated version of **Appendix 11.1 Flood Risk Assessment (APP-162)** which will be submitted for Deadline 3.
		EA23 Credible maximum scenario	A 57% peak river flow uplift was simulated in the bespoke fluvial flood model, along with a 40% direct rainfall uplift to assess two extreme event scenarios. Results for

		Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 5.3.11. Issue: A credible maximum scenario has not been assessed. Impact: Sensitive equipment could be at risk and the development may not be resilient to future flood risk. Solution: As the development would be classed as "Essential Infrastructure", it is important to also simulate a credible maximum scenario (+57%) as a sensitivity test to understand the resilience of the development should climate change uplifts deviate. Please simulate this scenario and implement any necessary resilience measures. Additional comments: Particularly important for the more sensitive aspects of the development such as the Battery Energy Storage System (BESS) and Transformers. Please note that we have also provided feedback directly to the Applicant as part of our review of their hydraulic modelling.	the extreme fluvial event were provided for the same 9 (no.) locations used in **Appendix 11.1 Flood Risk Assessment (APP-162)**. Flood depths in the extreme fluvial event were an average of 0.04m higher than the flood levels in the 1 in 100 year +32% scenario, with increases ranging between 0.01m and 0.08m. This is considered to be minimal and would not affect the conclusions within **Appendix 11.1 Flood Risk Assessment (APP-162).**
		EA24 Insufficient freeboard Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 6.2.6. Issue: Insufficient freeboard provided for the BESS. Impact: The development may not accurately mitigate for or be resilient to future climate change. Solution: The Applicant should assess the credible maximum scenario and provide evidence the BESS will be resilience to this flood event. Additionally, the applicant should provide a 600mm freeboard to ensure both inaccuracy in modelling and the build-up of debris can be accounted for. Additional comments: The Applicant has stated that parts of the BESS will be within the design event and due to this be placed on a plateau. However, this only provides a freeboard of approximately 100mm above the design event.	The simulated 'credible maximum scenario' showed that there would be negligible increases in flood depth in affected areas of the Site. Fluvial flooding would continue to impact the north-eastern corner of the BESS and Onsite Substation area, and the majority of the area would be unaffected. Presently, this area of the Site comprises sloped ground, which will be levelled to create a 'plateau' to accommodate the BESS. The method to level the ground (whether ground will be raised or lowered) will be confirmed once the detailed site investigation work is completed. Finished floor levels will either be set a minimum of 600mm above the design flood level if ground levels are raised, or else areas where ground levels are below the design flood level (plus 600mm freeboard), will be defended to prevent the ingress of floodwater. The design flood level will be confirmed based on the bespoke fluvial flood model prepared as part of **Appendix 11.1 Flood Risk Assessment (APP-162)**. In either scenario, compensatory floodplain storage will be required to offset any losses as a result of the proposed works. This will comprise level-for-level and volume-for-volume floodplain compensation, secured by Requirement 5 of Schedule 2 of the **Draft DCO (AS-008)**.
		EA25 Flood risk – stockpiling & bunds Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 6.2.19. Issue: There will be a need to stockpile soil for the 40-year duration of the development and bunds will be outside of Flood Zone 3, but the Flood Zones do not account for climate change. Impact: Flood risk could be increased because of the bunds if they are not appropriately sited. Solution: For the permanent bunds, please adopt the same placement considerations as the other permanent elements of the development. In the first instance, these bunds should be placed outside of the design flood extent, allowing for climate change. Where this is not possible, please ensure the impact is quantified and appropriate mitigation (such as compensatory storage) is sought if there are impacts to third parties.	The bespoke fluvial flood model produced as part of **Appendix 11.1 Flood Risk Assessment (APP-162)** includes a climate change scenario. This will, therefore, be used as the basis for confirming that all bunds are placed outside of the design flood extent, allowing for climate change, or else that sufficient mitigation is provided. This is secured in Requirement 5 of Schedule 2 of the **Draft DCO (AS-008)**. **Appendix 2.4 Outline Construction Environmental Plan (oCEMP) (APP-077)** states in paragraph 6.2.1: *"Storage of materials and stockpiling to be located outside the fluvial floodplain (i.e. Flood Zone 3) (where practical), flood storage areas and areas known to be at risk of surface water flooding"*. This is secured through Requirement 12 in Schedule 2 to the **Draft DCO (AS-008)**.
		EA26 Floodplain Compensation Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraphs 7.2.1, 7.2.3, 7.2.6, 7.2.9 and 7.2.11.	Section 7 of **Appendix 11.1 Flood Risk Assessment (APP-162)** confirms that level-for-level and volume-for-volume floodplain compensation calculations will be undertaken once final ground levels are fixed, to confirm potential losses in floodplain storage as a result of raising ground levels and of the proposed

		Issue: More detail is required in relation to floodplain compensation. The mechanism for consulting the EA on appropriate freeboard allowances and floodplain compensation calculations at the detailed design stage is also not clear. Impact: Potential for increased flood risk to the development and third parties. Solution: Please provide full details of the necessary floodplain compensation scheme and provide evidence there will no increase in flood risk offsite. Additionally, it should be shown that all compensation provided is on a level for level, volume for volume basis and all opportunities to reduce overall flood risk have been taken. Please include a Requirement within the draft DCO to secure this floodplain compensation and freeboard allowances. We request that we are consulted on the information submitted under such a Requirement. Additional comments: Given the displaced volumes presented within the FRA, floodplain compensation should be provided, or alternatively it should be demonstrated using the hydraulic modelling that there are no impacts to third parties because of the proposed development. We are happy to discuss and agree the wording of a Requirement with the Applicant.	structures within the development. The process will then be repeated to confirm that sufficient compensation can be provided by lowering ground levels in hydraulic continuity with the extent of the floodplain. It is noted that presently, significant portions of land in the west of the Solar Array Area are at a higher elevation than the design flood level, giving the potential for these to be lowered to provide sufficient compensation. This is secured in Requirement 5 of Schedule 2 of the **Draft DCO (AS-008)**. The Applicant considers that the Draft DCO includes adequate provisions to allow the local planning authorities ('LPA's) to enforce against requirement and ensure agreed measures are adhered to. The LPA would be able consult with the EA at its own discretion during the determination of the requirement should it determine the EA's input is required.
		EA27 Flood risk – construction phase Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 7.2.12. Issue: No assessment of impacts on flood risk from construction phase. Stockpiles arising from trench excavations could impede existing flood flow routes. The mitigation proposed does not appear to align with what the cause and pathway of increased flood risk is. Impact: Temporary flood risk increases may occur because of stockpiled material. Solution: Please provide details of the storage of materials, site compounds, temporary roads and/or crossings. Ensure stockpiles and materials are outside of Flood Zone 3b for both the main development area and the cable corridor. Where possible, endeavour to ensure stockpiles and materials are outside of the 1 in 100 year defended flood extent, assessing any remaining risk and providing appropriate mitigation. Additional comments: Ensuring large sections of trench are not exposed during wet weather or when flood warnings are in place, whilst welcomed, would not mitigate against the effects of impedance of flow or loss of floodplain storage from stockpiles.	Stockpiles of arisings from trench excavations will be situated outside of the extent of the 1 in 100 year defended flood event. The extent will be confirmed based on the bespoke fluvial flood model produced as part of **Appendix 11.1 Flood Risk Assessment (APP-162)**. This will ensure that there are no impacts on fluvial flooding as a result of the construction works. To further minimise any impacts on both fluvial and surface water flooding, stockpiles will also be arranged in a way so that these do not impede flood flow routes (e.g. by ensuring that long sections of stockpile are not placed coincident with the topography). Ensuring that large sections of trench are not exposed during wet weather will also minimise the extent of any stockpiled arisings. **Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)** states in paragraph 6.2.1: *"Storage of materials and stockpiling to be located outside the fluvial floodplain (i.e. Flood Zone 3) (where practical), flood storage areas and areas known to be at risk of surface water flooding"*. This is secured in Requirement 12 of Schedule 2 of the **Draft DCO (AS-008)**.
		EA28 Design flood level Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 7.6.15. Issue: No design flood level provided. Impact: This could lead to inaccurate heights being used for design event leading to a misrepresentation of flood risk. Solution: The applicant should provide specific levels for the design event and design proposed development accordingly. Additional comments: The Applicant has not provided a specific height for the design level. This has subsequently meant a specific height for finished floor levels of above ground infrastructure (convertor stations, BESS etc), height of solar panels and soffit heights for crossings have not been provided.	Modelling designed as part of **Appendix 11.1 Flood Risk Assessment (APP-162)** shows that flood levels vary greatly across the large site. Modelled flood levels at 9 locations show that in the east of the site, levels ranged from approximately 1.1mAOD (Above Ordnance Datum i.e. above sea level) to 1.7mAOD, and levels in the west range from 4.5mAOD to 4.6mAOD. It is, therefore, not feasible to use one single design flood level across the Site. **Appendix 11.1 Flood Risk Assessment (APP-162)** proposes instead to use the 1 in 100 year +CC ('climate change') 'breach' event as a 'design storm'. In this return period, flood depths range from 0.01m to 0.48m and, therefore, it is considered a more feasible approach to base panel heights/Finished Floor Levels on localised flood depths rather than a single flood level.

		We recognise that the flood modelling is still undergoing the review process and will require updating, but once finalised, this will need to be addressed.	
		EA29 Flood risk – solar panels Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 9.1.5 and 9.1.11 Issue: Flood risk from solar panels not assessed. Impact: Potential for increased flood risk offsite. Solution: Undertake an assessment of the volume of floodplain loss by the solar panels and the impacts this may have on flood extents and flood depths. Additionally, any impacts they may have on flood routes should also be assessed. Additional comments: Paragraph 9.1.11 assumes a negligible impact but does not demonstrate how this conclusion has been reached.	**Appendix 11.1 Flood Risk Assessment (APP-162)** assesses the impact of solar panels on fluvial and surface water flooding. There will be approximately 240,000 piles within the Proposed Development. The piles are C-shaped with a total length of 310mm and thickness of 3mm. The total footprint of the 240,000 piles is therefore estimated to be 223m^2 (0.0223ha). This is equivalent to 0.00004% of the 529ha Solar Array Area. The depth of fluvial flooding varies across the site and large portions of the site do not flood. Even in a scenario where the full site area floods to a nominal depth of 0.2m, there would be approximately 45m^3 of storage lost as a result of the piles. When compared to the overall 529ha area of the Solar Array Area, this impact is considered to be negligible. Piles are spaced at c3.5m intervals and it is considered that this provides a sufficient gap for fluvial and surface water flood flows to pass through unimpeded.
		EA30 Impacts on flood assets Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Issue: Impacts on these flood risk management assets not assessed. No demonstration of how access for maintenance and emergency incident response will be upheld. Impact: Potential for degradation and lower standards of protection provided. If assets cannot be accessed in times of a flood, and/or for maintenance, this could cause increases to flood risk. Solution: Assess the development's interactions and impact on all assets within their site boundary, both above ground due to additional crossings or below ground due to cable crossing interactions with embankment foundations. Additionally, show that access will be upheld and where possible improved to assets on site.	An EA flood defence asset is present along the Hodge Dyke through the centre of the site. There will be a 9m buffer between the development and the bank Main Rivers, which will allow access for maintenance and emergency incidents (secured via Requirement 5 of the **Draft DCO (AS-008)**). Furthermore, since there is a right of access to the Main River these will not be fenced off and access will, therefore, be retained. Where cables cross beneath these defences, these will be installed at sufficient depth to ensure that the foundations of the defences are not affected (secured via Requirement 5 of the **Draft DCO (AS-008)**).
		EA31 Borehole logs Environmental Statement, Appendix 11.4 Borehole Logs [APP-165] Environmental Statement, Appendix 11.6 Water Framework Directive Assessment [APP-167] Issue: Not all available logs presented. No justification given to support why only these logs are shown. Impact: Relevant information on other historical logs may be missed. Solution: Provide further information to justify selection and location of logs presented. Additional comments: These logs are all referenced in Chapter 11, which supports their inclusion in this appendix. We have identified several other historical borehole logs inside and within 250m of the site boundary. The other nearby logs are not referenced in Chapter 11 or included in Appendix 11.4, but there is no explanation of why or how this selection was chosen. The WFD Assessment refers to BGS Boreholes TF14NW6, TF14NE18, and TF14NW43. These boreholes are all within the vicinity of the site but are not discussed in Chapter 11 or Appendix 11.4. No acknowledgement or explanation is given.	The process for selecting boreholes to understand the Site hydrogeology to support **ES Chapter 11 Water Resources and Flood Risk (APP-062)** and **Appendix 11.6 Water Framework Directive Assessment (APP-167)** was based on a number of decisions. As part of the baseline description, publicly available sources of borehole logs were reviewed. There are a large number of borehole records near the Site. Therefore, in order to make **ES Chapter 11 Water Resources and Flood Risk (APP-062)** proportionate, a borehole selection process was undertaken based on the following aspects: • proximity of the borehole to the Site with a preference for boreholes that were onsite and / or nearby possible deep excavations; • boreholes which indicated water strikes or other groundwater observations; • deeper boreholes that were drilled though multiple strata and were representative of other shallow boreholes nearby; and • boreholes that were legible and interpretable. The overall intention of the borehole selection for hydrogeological purposes was to understand which strata are water bearing and at what depth groundwater was recorded, so any Proposed Development and groundwater interactions could be understood.

		Figures 11.3 and 11.4 show where these boreholes are in relation to the site boundary, but these figures are not referenced in Appendix 11.4, which would have been useful.	The Applicant will undertake the necessary Site specific ground investigations as part of the detailed design phase of works in order to ensure that the design and implementation of the Proposed Development reflects Site conditions and protects groundwater. In regard to the discrepancy between Appendix 11.6 Water Framework Directive ('WFD')) Assessment (APP-176) and Chapter 11 Water Resources and Flood Risk (APP-062) referenced boreholes, this appears to be a typographic error and the WFD Assessment baseline was based on the boreholes referenced in **Appendix 11.4 Borehole Logs (APP-165)**.
		EA32 Fire water – worst case scenario 7.2 Outline Battery Safety Management Plan [APP-279]. Paragraphs 4.3.21 and 4.3.22. Environmental Statement, Appendix 11.1 Flood Risk Assessment [APP-162]. Paragraph 8.2.11. Issue: Worst-case scenario is not considered. Words used do not provide clear direction and potential for contaminated water is given a reduced importance. Impact: Potential unacceptable risk to controlled waters. Solution: Revise wording and ensure protection considers the worst-case scenario, at least until detailed designs are known. Additional comments: In paragraph 4.3.21, the Applicant assumes a defensive firefighting strategy will be used, with no direct jets of water. While this is the more likely occurrence, given current information, it assumes that the worst-case will not occur. At this stage in the application process, in an outline strategy, we expect the worst-case to be considered. Paragraph 4.3.22 goes on to suggest that fire water can be contained if necessary in the event that water is deployed directly onto the fire, and shutoff valves could be used to prevent potentially contaminated water from being discharged to the watercourse. This approach does not assume the worst-case scenario. We suggest that any water used for firefighting could be contaminated, for example due to interaction with smoke and dust, or runoff from adjacent units interacting with burnt materials. We strongly suggest that shutoff valves be employed in all cases. We generally advise these are automatically activating when fire breaks out. The valve should remain closed until all residual risk has passed, including the affected area being cleaned up. This is in case of additional runoff, such as from rain on burnt units awaiting repair or removal. If retained water is not contaminated, it can safely be released after appropriate testing. This same paragraph on fire water runoff management is repeated in the FRA [APP-162], paragraph 8.2.11. We suggest it is updated to be consistent with any changes made here.	**Appendix 11.1 Flood Risk Assessment (APP-162)** will be revised for Deadline 3 to provide clarification. The firewater system will be designed to capture and retain all contaminated firewater. The worst-case scenario will be based on a 1:10 year storm event coinciding with a fire. Sufficient capacity would, therefore, be required to contain the 1 in 10 year rainfall event plus any potentially contaminated firewater runoff. After the fire has been managed, such contained firewater will be tested prior to disposal off-site at an appropriately licenced facility. Any consequential updates to other documents will be made at this deadline or the subsequent deadline.
		EA33 BESS drainage design 7.2 Outline Battery Safety Management Plan [APP-279]. Paragraphs 4.3.24 Issue: BESS design does not appear to incorporate known variables or assume the worst-case scenario. Impact: Design of drainage, including fire water capture, may be inadequate if known issues are not considered.	As set out in the **Outline Battery Safety Management Plan (APP-279)**, in the unlikely event of a fire within the BESS area, fire water can be contained within a lined lagoon at the centre of the BESS platform and within the aggregate surrounding the BESS units if necessary, e.g., in the further unlikely event that water is deployed directly onto the fire (as opposed to the more likely scenario of being used solely for the cooling of adjacent units), or heavy rainfall coinciding. Automatic shutoff valves installed at discharge points to the main drainage network to prevent potentially contaminated water from being discharged to the

		Solution: Revise BESS design, including drainage and fire water capture, to allow for known variables. The drainage system needs to be sufficient to capture all available fire water, plus a contingency for rainfall addition. Additional comments: The BESS should be designed to minimise risk from all known variables. We suggest the worst-case scenario is used in design, including maximum fire extent, largest water volume usage, and most sensitive fire location and site conditions. The extent of sealed drainage around the BESS should be sufficient to protect all soft ground, and there should be no permeable drainage within the furthest modelled zone of influence of BESS fire water.	watercourse. After the fire has been managed, such contained firewater will be tested prior to disposal off-site at an appropriately licenced facility. A full version of this document and final design work is secured by a Requirement in Schedule 2 of the **Draft DCO (AS-008)**. The lagoon and the aggregate surrounding the BESS units could realistically be redesigned (staying within the ES parameters) to hold the full volume of fire water retained on Site in water tanks plus a 1 in 10-year rainfall event. However, it would not be considered realistic or proportionate to design the lagoon to hold the full 27,276,000 capacity of the reservoir. **Appendix 11.1 Flood Risk Assessment (APP-162)** will be revised for Rule 6 Deadline 3 to provide further clarification.
		EA34 Requirement 7 - LEMP Issue: The EA is not listed as a consultee for the discharge of Requirement 7. Impact: Risks to protected species. Solution: We request to be consulted on the LEMP to be approved under Requirement 7.	The Applicant considers that the management of landscape and ecological schemes is not likely to impact protected species and, therefore, the EA does not need to be added as a named consultee in the requirements of the **Draft DCO (AS-008)**. Nevertheless, the LPA would be able consult the EA during the determination of the requirement should they require their input.
		EA35 Requirement 12 - CEMP Issue: The EA is not listed as a consultee for the discharge of Requirement 12. Impact: The CEMP provides essential mitigation measures to prevent impacts from construction sites. We often encounter construction sites that have caused issues because their CEMP was either insufficient or was not adhered to. Potential monitoring requirements may not be adequate if the Environment Agency are not consulted on them. Solution: We request to be consulted on the CEMP to be approved under Requirement 12.	The Applicant considers that the **Draft DCO (AS-008)** includes adequate provisions to allow the LPAs to enforce against requirements and ensure agreed measures are adhered to. The Applicant considers that the LPAs have adequate expertise to consider and agree monitoring methods. Nevertheless, the LPA would be able consult the EA during the determination of the requirement should they require their input.
		EA36 Requirement 18 - DEMP Issue: The EA is not listed as a consultee for the discharge of Requirement 18. Impact: Potential environmental impacts may not be adequately considered, particularly risks to groundwater and waste. Solution: We request to be consulted on the DEMP to be approved under Requirement 18.	The Applicant considers that the LPAs have adequate expertise to consider potential environmental impacts associated with the decommissioning of the Proposed Development. Nevertheless, the LPA would be able consult the EA during the determination of the requirement should they require their input.
RR-001	Boston Borough Council ('BBC')	The Environmental Statement determines Significant Adverse Effects that directly affect the Borough as follows: • Landscape effects upon the Holland Reclaimed Fen Landscape Character Area • Visual Effects upon residential receptors R10, R11, R12, R13, R14 & R15. • Visual Effects upon recreational receptors PROW Bick 2/1 and the highway network particularly from the A17 and Bicker Drove. • Loss of Best and Most Versatile Agricultural Land In this regard we do have concerns about the: • Loss of Best and Most Versatile Agricultural Land and whether it is adequately assessed and justified. • Visual Effect of the extension to the Bicker Fen Substation and the construction of the cable corridor. • Impact upon South Forty Foot Drain a Local Wildlife Site where the cable corridor crosses it particularly in regard to the potential loss of vegetation and clarity upon the crossing technique to be utilised.	**ES Chapter 6 Landscape and Visual (APP-057)** reports that there would be temporary change to the landscape character of the Holland Reclaimed Fen Landscape Character Area ('LCA') resulting from the presence of construction works associated with the Cable Route Corridor within the south-western extent of the LCA. This would result in temporary Moderate adverse (significant) effects at the construction phase, reducing to not significant levels at operation following cessation of construction activity. In relation to visual effects, **ES Chapter 6 Landscape and Visual (APP-057)** reports that there would be temporary significant adverse effects experienced by residential receptors in some individual properties, PRoW Bick 2/1, the A17 and parts of the rural road network within close proximity (a maximum distance of up to 500m from the Cable Route Corridor) to the Proposed Development. These effects will all be temporary and result from the short-term presence of construction activity within the Cable Route Corridor and works associated with the Bicker Fen substation. Effects will reduce to not significant levels following cessation of construction activity.

		• Clarity on the loss of landscape features and whether losses are adequately justified and mitigated against. • Whether adequate construction impact management and mitigation is in place and secured within the Requirements of the draft DCO. • Cumulative Impacts with consented DCO such as Heckington Fen in particular, but also other NSIP development within the vicinity in regard to construction Impacts including construction traffic routing. We seek to ensure that these matters are adequately considered and mitigated as appropriate. As one of the host authorities and Interested Parties for the project, the Council will be taking an active role in the examination process and welcomes the opportunity to provide our views on matters of local importance. In addition, from an economic and social perspective, BBC would like to see the development doing as much as it possibly can to maximise the benefits for local people and businesses for hosting this infrastructure.	**Figure 6.32 Vegetation Removal Plan (APP-236 to APP-238)** has been updated and submitted alongside this document at Deadline 1 to clarify the potential loss of vegetation on the South Forty Foot Drain. As set out in paragraph 2.8.2 and 2.8.3 within **Appendix 2.4 Construction Environmental Management Plan (APP-077) trenchless** measures, such as auger boring, HDD or micro-tunnelling will be deployed to cross Hodge Dike, Heckington Eau and South Forty Foot Drain. Therefore, there will be no requirement to remove existing vegetation on the South Forty Foot Drain. To provide further clarity, as set out in paragraph 2.4.5 of **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089),** the extent of vegetation indicated represents a worst-case scenario to provide flexibility. The precise extent and locations of vegetation removal will be confirmed during detailed design. Within the Cable Route Corridor the maximum width of vegetation removal will be 30m each place where the Cable Route crosses vegetation, as set out in paragraph 2.4.6 of the **oLEMP (APP-089)**. This width also allows for the implementation of any associated infrastructure such as the haul road. Mitigation for both landscape and visual effects will include the implementation of measures in **Appendix 2.4: Outline Construction Environment Management Plan (oCEMP) (APP-077)** and **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** to retain and protect existing vegetation. These measures will include the replacement of hedgerows lost during the construction phase. Detailed versions of these documents are secured by Requirements 12 and 7 in the **Draft DCO (AS-008)** respectively. The potential for cumulative landscape and visual effects to be experienced is considered in **ES Chapter 6 Landscape and Visual (APP-057)**. The assessment has found that there would be no significant cumulative landscape effects on the Fenland Sub Area associated with the in-combination effects of the Proposed Development and Heckington Fen Solar Park at all development phases, assuming construction and decommissioning activity will be at least partially concurrent. The long-term presence of energy infrastructure will have a characterising influence, although it has been found that there will be limited intervisibility between the respective developments at the operation phase, so this influence would be experienced across a relatively small proportion of the Fenland Sub-Area. In relation to the Holland Fen LCA, the most notable effects would be experienced during construction, where there is the potential for the simultaneous introduction of construction activity associated with connection works into the Bicker Fen substation. **ES Chapter 6 Landscape and Visual (APP-057)** reports significant visual effects for some residents, users of certain PRoW, and the local transport network within a distance of up to approximately 500m from the Cable Route. This is a result of close- to middle-distance views of construction activity associated with introduction of the Cable Route and Bicker Fen substation extension. On completion of the construction phase, the land within the Cable Route will be restored and there will be no significant visual effects. The Bicker Fen substation will be visible but perceived in relation to the context of the existing substation and associated large scale energy infrastructure in views. The loss of BMV land has been assessed in line with the IEMA (2022) guidance for assessing impacts on agricultural land and soils. The assessment methodology is explained above in response to a similar comment made by NKDC (RR-004). To summarise, the permanent loss of 23.31 ha of agricultural land within the Solar

			Array Area, and 29.99 within the Order Limits as a whole, amounts to a “High” magnitude of impact according to the IEMA guidance, as the area permanently lost is >20 ha. This is the highest category of impact magnitude in the IEMA methodology. Accounting the “High” sensitivity of the receptor, the overall effect on agricultural land is assessed as being Major and Significant in EIA terms. **ES Chapter 14 Soils and Agricultural Land (APP-065)** therefore already accounts for the worst-case of a Major and Significant effect on agricultural land. As set out in **ES Chapter 15 Socio-economics (APP-066),** the Proposed Development will result in significant benefits for the workforce, businesses and residents of Boston Borough as a result of the employment generated during construction and resulting Gross Value Added (GVA). **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)** discusses the beneficial impacts from employment creation, aims at reducing influx of workers and mitigates impacts related to loss of employment. The OSSCEP is secured via Requirement 17 in Schedule 2 of the **Draft DCO (AS-008)**. Measures will be included to prioritise local employment; and consider potential upskilling of local residents through apprenticeships.
RR-008	Historic England	**Setting of Designated Heritage Assets** We have reviewed setting impacts in respect of highly graded designated heritage assets. South Kyme Tower (listed grade I NHLE 1204786 and Scheduled Monument NHLE 1008317) + Church of St Mary and All Saints, South Kyme listed grade II* NHLE 1061749 as well as the Church of St Oswald, Howell, listed grade II* Listed Building (NHLE 1061833) are all identified as significant in EIA terms. However, as part of our commentary on the PEIR we noted the proposed mitigation of impacts does not appear to include deletion of elements of the array to address these impacts, this should be seriously considered. **Archaeological Remains** We noted in our response to the PEIR, chapter covering Cultural Heritage - Table 8.2 - an undesignated section of the Car Dyke is classed as a medium value feature, it is unwise to cap the value of any part of the Car Dyke and associated remains at this stage. The previous identification of sections for designation as a scheduled monument should not be taken as a negative assessment of the importance of those sections left undesignated. Notwithstanding their individual importance, undesignated sections contribute directly to the significance of the asset as a whole and hence to the significance of the scheduled parts as setting. Straightened sections of the Car Dyke may have below ground remains of an earlier line concealed to their side or under banking. We also noted in our re-consultation at Section 42 stage, the former ‘Waithe Pumping Engine’ shown on OS 1st edition 1:2500 of 1889 at approx. TF1534349715 adjacent to the Heckington Tunnel - and what may be its predecessor shown with a windmill symbol on the OS 1” 1824 at around the same point. The proposed works may interact with the remains of these features and their significance should be addressed. Furthermore, we take the opportunity to draw attention to a number of isolated historic buildings as marked on historic Ordnance Survey mapping, of which the proposal has the potential to interact with the remains of.	**Setting of Heritage Assets** Since the preparation of the Preliminary Environmental Impact Report (‘PEIR’), the setting of designated assets has been assessed in detail and is presented in **Appendix 8.2 Heritage Statement (APP-118)** and **ES Chapter 8 Cultural Heritage (APP-059).** The embedded mitigation measures pertaining to minimising or preventing harm to designated assets are outlined within **Appendix 2.3 Embedded Mitigation (APP-076)** and includes the following measures: • The existing and proposed hedgerows around the perimeter of the Solar Array Area will be managed to a height of up to 3.5m to provide visual mitigation. • Buffer zones will be created to increase separation between the Site and the asset. • Trackways, where possible, will follow existing field boundaries in keeping with the historic landscape field pattern. • A PRoW will be reconnected towards South Kyme, reinstating a historic route. With these measures in place, no further mitigation (such as the removal of solar arrays) is required. The churchyards are enclosed and surrounded by village dwellings (houses) and, therefore, the understanding and experience of the association, use and function between the church, graveyard and immediate village dwellings is not removed. With regards to the South Kyme Tower (Grade I Listed building, 1204786), the setting of this asset consists of its immediate surroundings within an enclosed medieval settlement comprising the Tower, which was once part of a fortified manor house, the existing manor house (Grade II Listed building, 1360601) built during the 18th century, and St Mary’s and All Saints Church (Grade II* Listed Building, 1061749). All three assets in this ‘group’ are enclosed by the earthwork remains of the former Augustinian Priory (a Scheduled Monument). All three assets are further enclosed

		Draft DCO As submitted the draft DCO requirement 11 reads as follows:- Archaeology 11.-(1) The authorised development must be implemented in accordance with the archaeological mitigation strategy. (2) No part of the authorised development may commence until a written scheme of archaeological investigation (which must accord with the archaeological mitigation strategy) for that part has been submitted to and approved by the relevant planning authority. (3) For the purposes of sub-paragraph (1), "commence" includes any permitted preliminary works. (4) Any archaeological works or watching brief must be carried out in accordance with the approved scheme. We note the content of the draft DCO in regards to archaeology, within section 11 (1-4). We also note the geophysical surveys and trial trench evaluation completed pre-submission. On the basis that pre-submission evaluation fieldwork (trial trenching) was undertaken for the majority of the Solar Array Area of the Proposed Development and along the proposed Bespoke Access Corridor to the west of the Proposed Development. We also acknowledge. As stipulated in Requirement 10: Archaeology of the draft Development Consent Order, a programme of targeted trial trenching on the Cable Route Corridor will be conducted following post-DCO consent. On this basis, we have no specific comments to make at this stage in relation to the draft DCO wording. We have reviewed the Archaeological Mitigation Strategy document submitted, and are broadly supportive of the approach set out, and encourage ongoing engagement with both ourselves and Lincolnshire County Council as this is developed and implemented.	to the west and the south by the River Slea banked by a high tree line, which provided further protection and seclusion. There is no intervisibility between the church and the manor house and the Proposed Development; any visibility towards or from the church and the manor house is precluded and obscured by the intervening landscape, including the River Slea and (beyond) the Midfodder Dike. Regarding Kyme Tower, there is visibility to and from the Proposed Development due to the height of the Tower where the upper section and battlements are visible. Therefore, whilst the immediate setting of the Tower (within its enclosed environment) does not experience change, the change within the wider landscape to the west affects the wider setting of the Tower, as experienced from the battlements. However, this will not diminish the experience and understanding of the Tower as a defensive structure guarding the enclosed settlement, the trading route of the River Slea and the village of South Kyme to the east. Therefore, the effect is considered low. The non-designated farmsteads have been considered. Following guidance with the National Planning Policy Framework ('NPPF'), Design Manual for Roads and Bridges ('DMRB') and the International Council on Monuments and Sites ('ICIMOS'), the value / sensitivity is low and the magnitude of impact is medium / low. Therefore, the significance of effect is considered to be slight adverse in the worst case. Setting, although contributing to significance, is not the most important factor regarding the importance and value of these assets. Physical attributes architectural merit, rarity of existing functionality, original features and layout largely define the significance of these assets and will not be impacted. Also, the fieldscape in which these assets sit will remain largely the same, including route ways to and from surrounding fields and farmsteads. The impact on the wider setting may be temporarily impacted through the introduction to change within the landscape, but the immediate setting, the built fabric and layout will remain unchanged. Following a meeting with Historic England on 26 September 2025, there was agreement regarding the assessment of designated heritage assets listed above. The Applicant is to provide supporting information for intervisibility and seasonal screening to demonstrate the assessment findings and embedded mitigation measures to Historic England. Therefore, no reduction / deletion of solar arrays is required. Furthermore, at the meeting it was pointed out that the assessment had moved on as considered and agreed with earlier comments from Historic England regarding the level of assessment on designated assets (for example, Car Dyke, considered as a Scheduled Monument). Historic England's comments had been considered within the assessment. **Archaeological Remains** The Applicant has revised **Appendix 8.11 Archaeological Mitigation Strategy ('AMS') (APP-153)** and is currently liaising with LCC to agree its content. This document will provide further detail on the mitigation areas within the Bespoke Access Corridor and the Cable Route Corridor. Within the Solar Array Area, the Applicant has avoided an area containing high archaeological potential through mitigation by design. The Applicant has undertaken extensive trial trenching across the Solar Array Area and within the Bespoke Access Road. The Applicant will also be carrying out targeted trial trenching within the Cable Route Corridor post-consent, as outlined within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)**, focusing on anomalies identified through geophysical survey and using

			an overlay of multiple non-intrusive surveys to provide evidence for, targeting of features. This approach should reduce areas of mitigation across the Cable Route Corridor, minimising risk and harm to below ground, non-designated heritage assets. This is an efficient approach to evaluation; minimising intrusive impacts across the landscape yet targeting areas to better understand potential and significance to ensure the conservation of archaeological potential. This is a landscape (understanding and evaluating the changes in landscape types and geology) approach to understanding archaeological potential and reducing harm as an iterative process. This is outlined in detail and the approach has been accepted by LCC within the revised **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** that is awaiting agreement with LCC. The Car Dyke is recognised as a designated asset (Scheduled Monument) and was considered so within the assessment. The Car Dyke, which is unlikely to be impacted, has been previously truncated and straightened, but is nevertheless considered as a designated asset. The design of the bridge (as shown on **Figure 2.8 Illustrative Permanent bridge designs for Bridges over Watercourses (APP-024)**) is intended to minimise impact and harm to the below ground archaeological deposits**.** For example, the timber bridge may be placed upon a raft cut within topsoil either side of the Dyke and thus not impact the Dyke or associated deposits. Whichever approach adopted, it will be mitigated by archaeological monitoring and record outlined within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)**. 'Waithe Pumping Engine' shown on OS 1st edition 1:2500 of 1889 has been assessed and this 'postulated' area will be subject to targeted trial trenching outlined within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153).** Following a meeting with Historic England on 26 September 2025, it was agreed that the Applicant will provide Historic England with the final draft of the AMS to review. Furthermore, at the meeting with Historic England it was pointed out that the assessment had moved on and considered and agreed with earlier comments from Historic England about the level of assessment on designated assets, for example, Car Dyke, considered as a Scheduled Monument and the Anglo-Saxon Trading Centre as up to high magnitude of effect. **Draft DCO** The Applicant notes that Historic England have no comments on the current drafting of the **Draft DCO (AS-008)**.
RR-033	Triton Knoll OFTO Limited	Triton Knoll OFTO Limited is submitting this representation to raise concerns about the Applicant's current proposal to obtain a land right for Triton Knoll Offshore Wind Farm's access track located off the A17 at Swineshead and the proposed protective provisions provided within the Beacon Fen Energy Park DCO Application (the "Proposed Protective Provisions"). Specific Concerns **Proposal to obtain a land right for Triton Knoll Offshore Wind Farm's access track** • The current Order Limits include a proposal to obtain land rights over Triton Knoll Offshore Wind Farm's access track located off the A17 at Swineshead. • Where the Applicant intends to acquire land rights, or interfere with any of Triton Knoll OFTO Limited's interests in land or Triton Knoll OFTO Limited's apparatus, Triton Knoll OFTO Limited will require appropriate	The Applicant notes the comments made by Triton Knoll and the request for protective provisions to be included in the **Draft DCO** (**AS-008)**. The Applicant and Triton Knoll are in discussions regarding the appropriate form of provisions. The Applicant is confident that agreement will be reached, which will enable the representation to be withdrawn. However, in circumstances where it is not possible to reach agreement, the Applicant will put forward final proposed protective provisions to be included in the draft DCO for the protection of Triton Knoll and make submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on Triton Knoll statutory undertaking, and so satisfy the tests within section 127 of the Planning Act (2008).

		protection and further discussion is required on the impact to its apparatus and rights. • Triton Knoll OFTO Limited requires that its retained apparatus be adequately safeguarded at all times, which includes: (i) preserving the right of access for Triton Knoll OFTO Limited to inspect, maintain, renew, and repair its apparatus; and (ii) ensuring no works obstruct or restrict Triton Knoll OFTO Limited's rights. **Protective Provisions** • The Proposed Protective Provisions do not provide appropriate protection to Triton Knoll OFTO Limited. On the Heckington Fen Solar Park project Triton Knoll OFTO Limited has bespoke protective provisions and Triton Knoll OFTO Limited requires the same here. • Triton Knoll OFTO Limited requires that the protective provisions: (i) ensure compliance with relevant safety and operational standards; (ii) clarify the Applicant's obligations when carrying out any works in close proximity to Triton Knoll OFTO Limited's apparatus; and (iii) protect Triton Knoll OFTO Limited's land interests and apparatus. • Triton Knoll OFTO Limited is liaising with the Applicant regarding the form of these protective provisions and once agreed, these protective provisions will be submitted to the examination. • Triton Knoll OFTO Limited requests that the Applicant continues to engage with it so that Triton Knoll OFTO Limited may be reassured as to how the Applicant's works will provide adequate protection for those Triton Knoll OFTO Limited assets which remain in situ, and facilitate all future access and other rights. **In Summary** Triton Knoll OFTO Limited remains open to ongoing engagement and supports coordinated infrastructure delivery. Triton Knoll OFTO Limited request that the Examining Authority ensure that the Beacon Fen Energy Park project does not prejudice Triton Knoll OFTO Limited's project and that appropriate safeguards through Triton Knoll OFTO Limited's preferred protective provisions are incorporated into the Order to that effect.	
RR-013	National Grid Viking Link ('NGVL')	NGVL does not object in principle to the proposals. However it is imperative that relevant and adequate protections are put in place in the draft Order so not to compromise NGVL's ability to deliver its statutory undertaking. NGVL is the owner and operator of the UK onshore element of the "Viking Link Interconnector", which is a 760km, 1,400MW sub-sea electricity interconnector between the UK and Denmark. The UK onshore cable is 65km in length and connects into the National Grid at Bicker Fen substation in Lincolnshire. Given the strategic importance of the Viking Link Interconnector to the UK energy system, NGVL wishes to make a relevant representation to the Project in order to protect their position in relation to the Viking Link existing and proposed infrastructure and associated land interests within or in close proximity to the proposed limits of the draft Order boundaries ("Order Limits").	The Applicant notes the comments made by NGVL and the request for protective provisions to be included in the **Draft DCO (AS-008)**. The Applicant and NGVL are in discussions regarding the appropriate form of provisions. The Applicant is confident that agreement will be reached, which will enable the representation to be withdrawn. However, in circumstances where it is not possible to reach agreement, the Applicant will put forward final proposed protective provisions to be included in the draft DCO for the protection of NGVL and make submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on NGVL's statutory undertaking, and so satisfy the tests within section 127 of the Planning Act (2008).

		NGVL's rights to retain the Viking Link infrastructure in situ, to protect it from interference/damage, and rights of access to inspect, maintain, renew and repair it, should be maintained at all times and must not be restricted. **NGVL Land Interests and Infrastructure Impacted** The Project will involve the construction, operation (and maintenance) and decommissioning of a solar photovoltaic (PV) electricity generating facility and battery energy storage system (BESS), with associated export and connection infrastructure to, and above and below ground works at, the existing National Grid Bicker Fen Substation ('Bicker Fen Substation') that is owned by NGVL. The Project's Solar Array Area will connect to the Bicker Fen Substation via a new single 400kV circuit comprising of three 400kV underground cables plus auxiliary cables to be located within the Cable Route Corridor. The underground Cable Route will connect the Onsite Substation located within the Solar Array Area to the Bicker Fen Substation. The Cable Route Corridor will cross the Viking Link, Triton Knoll and Heckington Fen Solar Park cable routes from east to west, respectively. The documentation and land plans submitted for the Project have been reviewed in relation to impacts on NGVL's existing apparatus and land interests located within this area. The Applicant is seeking permanent rights over several plots containing NGVL infrastructure including plots 12-5, 12-6, 12-12, 13-1 in which NGVL have a Category 1 interest and plots 12-8, 12-9, 12-10, 12-11, 12-14, 12-16,12-17, 12-18, 12-19 in which NGVL have a Category 2 interest. NGVL currently awaits documentation and exact plans for the Project that meet NGVL's internal requirement in order to establish the exact nature of the impact on NGVL's existing infrastructure and land interests located within this area. **Compulsory Acquisition Powers** NGVL notes that the Book of Reference indicate that powers for the compulsory acquisition of rights and extinguishment of rights are included over NGVL's operational land and apparatus. NGVL strongly opposes any compulsory acquisition or extinguishment of rights over its operational land. Any such powers would cause serious detriment to NGVL's ability to comply with its statutory duties. **Protective Provisions** NGVL recognises and welcomes the form of Protective Provisions for the protection of NGVL's operations which are included on the face of the draft Order (Part 5 of Schedule 11). However, the current form of Protective Provisions omits the provisions concerning Acceptable Insurance and Acceptable Security. This protection is necessary and required for this Project because in the event that any impediment is caused to NGVL's apparatus or NGVL's assets during the construction period, this can have significant consequences for the operation of the electricity network as well as a high risk to safety. The Undertaker must provide acceptable security and insurance to ensure that any risk associated with the Project works taking place in proximity to NGVL's assets and apparatus is mitigated and further that there is no ambiguity to NGVL's ability to seek injunctive relief in respect of the works. Accordingly, at present NGVL object to the draft Order on the basis that it does not include Protective Provisions in NGVL's preferred form. , NGVL is currently in the process of agreeing with the	

		Applicant the preferred Protective Provisions along with any supplementary agreements which may be required. NGVL will keep the Examining Authority updated in relation to these discussions.	
RR-038	Anglian Water Services	Anglian Water Services (AW) is the statutory water and wastewater services provider for the proposed Beacon Fen Energy Park project order limits. AW has engaged with Beacon Fen Energy Park Limited (the Applicant) and there are on-going discussions regarding the interfaces between the project and our assets. In particular, AW is proposing to develop a new reservoir in proximity of the Beacon Fen project and this is referred further below in more detail. Through pre-submission discussions with the Applicant, a set of Protective Provision has been included in the 'Draft Development Consent Order' Schedule 11, Part 3 For Protection of Anglian Water Services Limited (document ref. APP-039). A 'Draft Statement of Ground' has been submitted with the DCO application regarding various matters under discussion (document ref. APP-284). AW will need to discuss this further with the Applicant as it has only made comments on an earlier draft. Our intention is that agreement on the Protective Provisions, or other legal Agreement as may be appropriate, will be reached and other matters will be covered by a bilateral Statement of Common Ground being progressed. Interfaces between the project and AW assets (underground and surface assets) AW owns and operates the water supply and sewerage infrastructure within the project area. There are significant existing AW assets with numerous buried mains water pipes, sewers etc. located within/ adjacent to the public highway which serve the local villages including: Kirkby La Thorpe, Ewerby, Asgarby, Boughton, Ewerby Thorpe, Howell, Heckington, South Kyme, East Heckington, Great Hale and Bicker. In locations where the project intersects with AW assets, their protection and continuity of water and water recycling services to customers will be required. We have provided a response to a land interest questionnaire. This has not located any above ground assets or formal easements within the project boundary. The AW existing assets identified within the application boundary are included in the 'Book of Reference' (document ref. APP-044). Discussions are taking place between AW and the Applicant on these aspects to confirm, for example, any sensitive plant, open cut locations, access works, likely diversions any above ground plant and shared access locations. These documents will need to be amended accordingly as these matters are agreed. We welcome the submission of an outline Construction Environmental Management Plan ('CEMP') (document ref. APP-077). Whilst Protective Provisions should address those interactions with our assets, AW would seek to ensure that 24/7 access to our assets. Listed under Section 3.10 are only Main water pipes, including decommissioned ones. However, there are other assets such as Water Recycling Centres (WRCs), mains sewer pipes and sewer pumping stations which exist and require protection and access should not be compromised. We would, therefore,	As part of the Applicant's ongoing works regarding water demand and water supply options, the need for the Proposed Development to connect to Anglian Water Services' main water network for 20m^3/day is being considered. The latest Water Demand and Options Appraisal report will be submitted into examination for Deadline 3. If the Applicant confirms a need to connect to Anglian Water Services, they would engage with Anglian Water Services. As noted, a draft SoCG has been prepared in consultation with Anglian Water and submitted with the DCO application. One or more versions (revised drafts) of the SoCG are anticipated to be agreed between the parties during the examination period and submitted to the Examining Authority, to provide clarification between the parties and to the Examining Authority on matters that are agreed and where differences lie. The purpose of this is to identify and resolve key outstanding issues and concerns at an early stage of an examination process. The SoCG will cover the Lincolnshire Reservoir DCO application, connection to Anglian Water Services water main and foul or combined sewer connections (the Applicant is currently not proposing connecting to Anglian Water's sewer system), **Draft DCO (AS-008)** drafting, including Anglian Water Services as a consultee to the drainage strategy via Requirement 10 and any controls on surface water discharge. Section 3.10 of **Appendix 2.4 Outline Construction Environmental Management Plan (OCEMP) (APP-077)** has been updated to include Anglian Water Services' Water Recycling Centres ('WRC's), mains sewer pipes and sewer pumping stations. The Applicant considers that the **Draft DCO (AS-008)** includes adequate provisions to allow the LPAs to enforce against requirement and ensure agreed measures are adhered to. The Applicant considers that the LPAs have adequate expertise to consider and agree the Decommissioning Environmental Management Plan. Nevertheless, the LPA would be able consult with Anglian Water at its own discretion during the determination of the requirement should it determine Anglian Water's input is required. The Applicant notes the comments made by Anglian Water and the request for protective provisions to be included in the **Draft DCO (AS-008)**. The Applicant and Anglian Water are in discussions regarding the appropriate form of provisions, with the latest draft shared with Anglian Water on 12 June 2025 and comments/confirmation awaited in return. The Applicant is confident that agreement will be reached, which will enable the representation to be withdrawn. However, in circumstances where it is not possible to reach agreement, the Applicant will put forward final proposed protective provisions to be included in the draft DCO for the protection of Anglian Water and make submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on Anglian Water's statutory undertaking, and so satisfy the tests within section 127 of the Planning Act (2008).

		welcome further discussion with the Applicant regarding such matters and their inclusion in these management plans. The final versions should also include steps to remove the risk of damage to any of AW's assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. We would anticipate this being one matter which can be satisfactorily resolved and covered in an agreed SoCG and would support AW's Protective Provisions in the DCO. Based on the above being satisfactorily addressed, AW would be content to be a consultee on the Decommissioning Environmental Management Plan at the post DCO consent stage (document ref. APP-078). Lincolnshire Reservoir AW is proposing to develop a new reservoir in Lincolnshire in the East of England, recognising the need to plan long term for our region's future in line with our adopted Water Resources Management Plan 2024 (WRMP24). Our new raw water reservoir is at the heart of a whole new water supply project. Together with the associated water infrastructure we need to transfer water to the reservoir, and from the reservoir to homes and businesses, it will secure a reliable water supply for generations to come. The project is being progressed through the DCO application process. The new reservoir would be located to the south-east of Sleaford, to the southwest of Heckington between Swaton, Scredington and Helpringham. Whilst the Beacon Fen application is progressing ahead of the Lincolnshire Reservoir DCO application, which is currently due for submission in winter 2028/2029, the size and scale of the project mean a longer period of pre-application development is needed. AW has been developing this proposal since 2022, and the reservoir site and potential sources are identified in our Water Resources Management Plan 24. The reservoir itself would be located some distance from the Beacon Fen project. However, one of the proposed water sources is the River Witham, with infrastructure required to take water from the Witham to the reservoir by open channels and/ or pipelines. Following an options appraisal process we identified two routes for this transfer which we presented at our second non statutory phase of consultation which took place between May- August 2024. Please see map of the project as presented during our phase two consultation in 2024 - 13463 - Anglian Water LINCS - Associated Infrastructure brochure 2024 A4 36pp_FINAL AW.indd (page 7). The options explored the use of either open channels or a pipeline to take water from the River Witham to the South Forty Foot Drain and then from the South Forty Foot drain to the reservoir. The Beacon Fen cable corridor crosses the South Forty Foot Drain between the open channels/ pipeline and the reservoir; so the Cable Route for the Beacon Fen project would pass under a waterway being considered as part of the Lincolnshire Reservoir project. The Lincolnshire Reservoir project is at an early stage of design development and as our understanding of our project develops it may be that a requirement for works to the South Forty Foot Drain to accommodate the transfer are identified, leading to an interaction between the two projects and an overlap between the Order limits of the projects.	

		Reflecting the early stage of design development AW is also looking at other options for the transfer between the River Witham and the reservoir. This may involve a new pipeline or open water channel for the reservoir project crossing part of the Beacon Fen project in a location not identified in AW's consultation in Summer 2024. This is likely to involve either the installation of a pipeline for AW under a cable connection developed by Beacon Fen or the cable corridor passing under an existing open water channel that may be improved as part of the Lincolnshire Reservoir project. The project is listed within both the ES 'Cumulative Assessment Long List Document' (document ref. APP-080) and 'Cumulative Assessment Short List' (document ref. APP-082). The Applicant has been engaging proactively with AW since the early stages of project development. AW welcomes this positive approach to engagement and wishes to continue this. Given the nature of the interactions between the projects, it is at this stage presumed that with appropriate additional Protective Provisions or other legal Agreement as may be appropriate, and ongoing engagement on project design, any future interactions between the projects could be managed such that it would not be an impediment to the development and implementation of either project. Water supply and wastewater services Water supply (potable and non-potable) - AW understands that the Beacon Fen project will require some water supply for the construction, operation (including maintenance) or decommissioning stages of the project ES 'Chapter 11: Water Resources and Flood Risk' (document ref. APP-062). For each phase of development there are different potable and non-potable water demands for the Project. Details on seeking further advice from AW on water capacity and options have been provided to the Applicant. A pre-planning enquiry has been submitted and this is for a water request of less than 20m3/day. As a water scarce area designated by the Environment Agency, AW acknowledges the approach that non-potable water supplies will looked to be used for the construction, decommissioning and operational phases. AW welcomes the proposed option for rainwater harvesting to collect non-potable supplied for activities. It is assumed that this will also cover wheel washing equipment and dust suppression during construction and requirements for water. Wastewater connections - As part of the ES 'Chapter 11: Water Resources and Flood Risk' (document ref. APP-062) and accompanying the application, these provide confirmation that disposal of foul water is not intended to be discharged to a local sewer and the assessment has not taken into account sewer supply and capacity. Details on the process for engaging with AW if there were any future sewage connection requirements have been provided to the Applicant. Surface Water and Drainage The document ES 'Chapter 11: Water Resources and Flood Risk' (document ref. APP-062) confirms that discharge of surface water will be managed within the Site area, using SuDS features, where feasible. Therefore, AW's foul or combined sewer systems is not being sought as part of the DCO application.	

		Any future consideration of the use of the public sewer network to manage additional surface water flows, AW will need to be included as a consultee to the drainage strategy, including the relevant DCO Order for any discharge of requirements in relation to drainage plans and surface water discharge.	
RR-009	Lincolnshire Wolds Joint Advisory Committee (National Landscape/AONB Partnership)	I write to express concerns regarding potential impacts on the setting of the Lincolnshire Wolds National Landscape. Due to the number of Solar PV NSIP schemes in Lincolnshire, there is potential for cumulative impacts in relation to the Beacon Fen Energy Park Project, along with the other NSIP projects in the region. Potential harms from lighting, glint and glare, construction traffic and significant landscape character change, may all contribute to erode the setting to the National Landscape. Also, views from the higher ground in the Wolds onto the low lying Fens are open and long distanced. The National Character Area of the Fens (NCA 46) is expansive and flat with sparse woodlands. The juxtaposition between the Fens and the Wolds affords the National Landscape it's wider setting and prominence in the region as such we raise concerns that views to and from the Wolds may be affected by the proposed scheme.	**ES Chapter 6 Landscape and Visual (APP-057)** notes that the Proposed Development is not located within, or within the setting of, any national statutory landscape designation, including National Landscapes. The Proposed Development is located approximately 25km to the southwest of the Lincolnshire Wolds National Landscape at the closest point. Whilst it is recognised that the elevated nature of the Wolds facilitates views across lower lying landscapes, including the Fenland landscape to the south and south west, effects on the special qualities of the Lincolnshire Wolds National Landscape, associated landscape character or visual receptors were not scoped in or considered in **ES Chapter 6 Landscape and Visual (APP-057)** because of the considerable separation distance between the area and the Proposed Development. At this distance, the Proposed Development will be barely perceptible for receptors within the Lincolnshire Wolds National Landscape and it will not be discernible as a discrete element of the landscape in views. Therefore, the potential for the Proposed Development to have an impact on the visual or landscape qualities of the area is extremely limited. Lincolnshire Wolds Area of Outstanding Natural Beauty Conservation Board was consulted during the Applicant's Statutory Consultation but no response was received.
RR-015	Natural England	**NE1 Internationally & nationally designated sites** **Study Area (C (Construction), O (Operational), D (Decommissioning))** The study area for statutory designated sites makes no reference to Natural England's Impact Risk Zones (IRZ's). However, in pre-application consultation between NE and the applicant, it was established that the study area used has identified all relevant sites and as such NE are satisfied with the study area used.	The Applicant notes that Natural England are satisfied with the study area used.
		NE2 Internationally designated sites **Identification of relevant sites (C, O, D)** The HRA Screening Report provides detail on the screening of Internationally Designated Sites. Natural England welcomes consideration of the Wash designations (Ramsar & SPA), and The Wash & North Norfolk Coast SAC, especially given their distance from the project at <15km and due to the potential disturbance to qualifying species & hydrological connectivity as identified in Section 4.1.2, Table 2. Natural England welcome the revised decision to scope in The Wash Ramsar and SPA for further assessment and note the inclusion of these designations in the HRA Screening Report (APP050). **NE3 Functionally Linked Land – The Wash SPA and Ramsar (FLL) (C, O, D)** Ideally, Natural England would have liked to be provided a summary table for the HRA to display the SPA species considered in assessments undertaken by the applicant. Nonetheless, Natural England has reviewed Appendix 7.5 Wintering Bird Report (APP-094) and generally concur, aside from the screening out of impacts upon Lapwing which, as displayed in	**NE3 Functionally Linked Land – The Wash SPA and Ramsar (FLL) (C, O, D)** The impacts on lapwing have been reviewed. Lapwing using nearby fields to the Proposed Development to overwinter could be disturbed by noise generated during construction. A peak count of 450 birds were recorded in fields close to the Proposed Development, which is over 1% of the lapwing population using the Wash SPA and Ramsar. Therefore, it was identified that there could be significant impact on the populations of lapwing using the Wash SPA and Ramsar as a result of the Proposed Development without additional mitigation. As such, it is proposed that during the construction phase, a temporary buffer is put in place around the areas lapwing were sighted over winter (November to February), in line with that recommended for gadwall (60m) to avoid noise impacts on lapwing. The 60m buffer for lapwing will mitigate potential impacts. **Appendix 2.4 Outline Construction Environmental Management Plan (OCEMP) (APP-077)** has been updated for Deadline 1 to reflect the lapwing buffers. **NE6 In-combination Assessment (C, O, D)** Further information regarding the cumulative effects of development have been incorporated within the SoCG that will be agreed with Natural England. The developments that were in **Appendix 4.2 Cumulative Assessment Short List (APP-082)**, but not included within the **shadow Habitat Regulations Assessment**

		Table 4.1, had a site peak count of 452, equating to approximately 1% of the SPA population. **Natural England would welcome further rationale in regards to the importance of the site for Lapwing and the potential for impacts upon Lapwing using the site. Whilst Lapwing are not named in the SPA/Ramsar citation, they should be considered part of the 'Waterbird Assemblage' for which the site is notified.** **Requirement 12, of the draft Development Consent Order (DCO) secures the relevant mitigation details, namely the CEMP.** **NE4 Functionally Linked Land – The Wash and North Norfolk Coast SAC (FLL) (C, O, D)** Natural England welcome the proposed mitigation measures, specifically the proposal for a 60m buffer from the reservoir during winter months to reduce impacts on wintering birds (notably Gadwall), as outlined in Section 5.2 of the HRA Screening Report. We welcome the mitigation will be implemented via the oCEMP which will be secured by Requirement 12 of the DCO. Natural England welcome the mitigation measures outlined in Section 5.28- 5.2.12 of the HRA Screening Report, specifically, the avoidance of impacts to Otter through the use of Horizonal Directional Drilling (HDD) methods. Given the avoidance of impacts by HDD, NE concur with that the project is unlikely to cause an adverse effect upon Otters and therefore the Wash and North Norfolk Coast SAC and have no further comments. It is noted that further surveys for protected species will be carried out once the locations of crossings have been defined. Where additional impacts are identified, the correct licence must be obtained, with impacts to Otter reassessed under the Habitats Regulations as appropriate. **NE5 Hydrological Connectivity (C, O, D)** Hydrological Connectivity from the development site to The Wash SPA and Ramsar and The Wash and North Norfolk Coast SAC is acknowledged within the HRA Screening Report. NE concur with the assessment that there is expected to be no adverse impacts on water quality or to the hydrological regime on the Wash SPA and Ramsar and North Norfolk Coast SAC as a result of the proposal. The nature of the proposed development, alongside the distance from the designations and embedded mitigation measures (oCEMP) means that any pollutants from the development site are highly unlikely to alter the background pollution at the designations, and thus are considered to have no appreciable effect. **Requirement 12, of the draft DCO secures the relevant management plan, namely the CEMP.** **NE6 In-combination Assessment (C, O, D)** Natural England welcome the consideration of the project alongside other plans/projects with the potential for in-combination effects on Internationally Designated Sites. NE welcome Table 5 of the HRA Screening Report which provides a clear summary of plans and projects with the potential for in-combination effects. NE welcome the detailed consideration of Heckington Fen Solar Park in Table 5 of the report (APP-050) and concur with the conclusion that through appropriate design and mitigation, the project is unlikely to work in-combination with the proposed development to cause a significant effect.	**(APP-050)**, have been included within the SoCG and potential cumulative impacts have been assessed. Projects in **Appendix 4.2 Cumulative Assessment Short List (APP-082)** include: Triton Knoll Electrical System; Outer Dowsing Offshore Wind (Generating Station); Lincolnshire Reservoir; Springwell Solar Farm; Boston Alternative Energy Facility, and; Temple Oaks Renewable Energy Park. The cumulative impact assessment found that no cumulative impacts are expected. Projects including Triton Knoll Electrical System, Lincolnshire Reservoir, Springwell Solar Farm, and Temple Oaks Renewable Energy Park do not have overlapping construction times or are at a sufficient distance that no overlapping impacts are expected. Outer Dowsing Offshore Wind (Generating Station) identified impacts on non-breeding birds as a result of the onshore works of the Outer Dowsing project. Therefore, there is the potential for cumulative impact from disturbance as construction of Outer Dousing and the Proposed Development could occur at the same time. However, the Outer Dowsing Offshore Wind (Generating Station) project identified mitigation including avoiding work around sensitive areas over winter, use of an Ecological Clerk of Works for local impacts and a pink-footed goose management plan. With this mitigation and the mitigation proposed for the Proposed Development, no cumulative impacts are expected. The Habitats Regulation Assessment of Boston Alternative Energy Facility identified disturbance and habitat loss of waterbirds as a result of the Boston Alternative Energy Facility project, including Lapwing and Gadwall, which could have a cumulative impact with the Proposed Development. Although the Boston Alternative Energy Facility has received a DCO, and construction should not occur at the same time as the Proposed Development, there is potential for some overlap and hence cumulative impacts on waterbirds. The Boston Alternative Energy Source Project application included an Outline Ornithology Compensation Implementation and Monitoring Plan, which details mitigation measures. This includes identification and management of compensation areas. With this mitigation in place, there is expected to be no cumulative impacts on qualifying species of the designated sites.

		However, it is unclear why the plans/projects identified in Appendix 4.2 Cumulative Assessment Short List (APP082) and Table 18.3 Summary of InterCumulative Effects (APP-069) have not been reviewed within the HRA Screening Report. It is unclear whether all relevant cumulative impacts have been considered for the plans/projects included within Appendix 4.2 and Table 18.3. Natural England would welcome clarity on this and reasoning for their exclusion from assessment in the HRA. **Clarity should be provided regarding the projects considered within the HRA in combination assessment.** **NE7 Conclusions (C, O, D)** NE requires further information on Key Issue NE3 and NE6 and cannot concur with the conclusions of the HRA Screening Report.	
		Nationally designated sites (biodiversity & geodiversity) **NE8 Wilsford & Rauceby Warrens SSSI Conclusions (C, O, D)** Chapter 7 of the ES correctly identifies the Nationally Designated Site, Wilsford & Rauceby Warrens SSSI as being within 10km of the development site. The SSSI is sensitive to pollution and could be affected by airborne contaminants and was therefore scoped in for further assessment. Para 7.6.32 states that during construction of the Proposed Development, the additional traffic required may impact the air quality of the SSSI, however, traffic modelling has shown that the assessment thresholds are not exceeded; thus NE raise no concern. **NE9 The Wash SSSI Conclusions (C, O, D)** Natural England have no further advice regarding The Wash SSSI. The assessment of impacts to the qualifying features of the overlapping European designations (The Wash SPA, The Wash Ramsar, The Wash and North Norfolk Coast SAC) is considered to cover any relevant impacts to the SSSI's notified features. As a result, this assessment does not need to be duplicated within the ES, although NE welcome the reference to the underpinning SSSI designations within the HRA Screening Report.	The Applicant notes that Natural England has no concerns in relation to potential effects on nationally designated sites (biodiversity & geology).
		Protected species licencing **NE10 Avoidance by design & Licence identification (C, O, D)** NE have been engaged by the applicant during the pre-application period, and welcome the approach to avoid impacts upon protected species via avoidance by design. Great Crested Newts Through discussions with the applicant, they have identified the need for a mitigation license for Great Crested Newt (GCN). NE also note para 7.7.8 of Chapter 7 of the ES which states that '*A European Protected Species mitigation licence is necessary to permit construction work given the nearby GCN populations and their conservation status or the habitat in which they are found*'. As it stands, Natural England are yet to receive a draft licence application. The applicant must submit the draft licence as soon as possible. Otters and Water Vole Natural England welcome the approach to avoid impacts to Otters and Water Vole through embedded measures, as outlined in Table 7.8 of Chapter 7 of the ES. However, we note the following in Table 7.8 '*If watercourses where water voles and otters are known to be present cannot be avoided for the Bespoke Access Road/ Cable Route Corridor, a*	The Applicant issued a draft Great Crested Newt ('GCN') licence application to Natural England on 21 August 2025 and the Letter of No Impediment was received on 23 September 2025. **Appendix 5.4 Other Consents and Licences Statement (APP-276)** will be updated to reflect this (and submitted at Deadline 1). A licence for water voles and/or otters is not required based on the Applicant's knowledge of these species across the Proposed Development and embedded mitigation (outlined in Table 7.8 of **ES Chapter 7 Ecology (APP-058)**), including buffers around watercourses and safe storage of chemicals. Further mitigation measures relating to water courses are outlined within **Appendix 2.4 Outline Construction Environmental Management Plan (OCEMP) (APP-077)**. No water voles or otters were found to be using the Solar Array Area. A number of signs of water vole were found in watercourses within the wider Cable Route Corridor. The refined cable route avoids water courses where water voles were recorded and buffers around water courses minimise the possibility of impacts. If the situation changes and there is a potential impact to these species, Natural England will be consulted as soon as possible to obtain the required licence.

		licence and further surveys may be required'. Where this is the case and impacts cannot be avoided, Natural England should be consulted as soon as possible and a licence and further surveys may be required. Where the need for a licence is identified post consent, the relevant license must be obtained from Natural England in the usual manner (i.e. this DCO does not preclude the project from the need to apply for the relevant mitigation licence). **A draft licence for GCN should be submitted to NE as soon as possible, to enable a Letter of No Impediment to be provided prior to the end of examination.** **The draft DCO clearly states at Part 2 (Principal Powers) point 4(2) regarding authorisation of use that '*Paragraph (1) does not relieve the undertaker of any duty to obtain any permit, licence or other obligation under any other legislation that may be required from time to time to authorise the operation or use of any part of the authorised development*'. This is welcomed.**	
		NE11 Biodiversity net gain (C, O, D) Natural England welcome the commitment to BNG, as illustrated in the Biodiversity Net Gain Strategy Document. Paragraph 1.1.2 acknowledges that BNG is not yet a mandatory requirement for NSIPs, however, the applicant has demonstrated that it is still committed to achieving BNG. Section 4.1.1 indicates that based on the current site plans, and using the Statutory Metric (July 2024), the proposed development will give rise to: - 36.43% net gain in Habitat units - 10.79% net gain in Hedgerow units - 15.95% net gain in Watercourse units Natural England welcome the net gain in biodiversity as illustrated across all units. Additionally, Natural England welcome the commitment to habitat management and monitoring through the undertaking of BNG habitat condition assessments and review of management as outlined in the Section 6.1.1 of the BNG Strategy document. NE also welcome the commitment to monitoring across the lifetime of the Proposed Development, which exceeds the standard 30 year requirement of BNG management and monitoring. **NE welcome the intent that the percentages stated in Section 4 of the Biodiversity Net Gain Strategy Document will be delivered as a minimum. This could be made more clear by including the percentages within the DCO requirement wording directly.**	The Applicant welcomes Natural England's positive confirmations in respect of its Biodiversity Net Gain Strategy. In respect of the comment regarding the wording of the DCO requirement – the Applicant does not consider it necessary or appropriate to reference a specific percentage within the requirement wording. The requirement is deliberately drafted to refer to the commitments within **Appendix 6.7 Outline Landscape and Ecology Management Plan (OLEMP) (APP-089)**, which sets out the commitments made in respect of BNG (by reference to the **Biodiversity Net Gain Strategy (APP-280)**) and which the submitted **Biodiversity Net Gain Strategy (APP-280)** must be in accordance with, pursuant to Requirement 8 of the **Draft DCO (AS-008)**. Requirement 8 provides that such BNG strategy must be approved by the relevant planning authority, in consultation with the relevant Statutory Nature Conservation Body ('SNCB'), prior to commencement of the authorised development. It can be seen that the appropriate level of clarity and control is already provided within the existing wording and which drafting is well precedented in made DCOs, including Requirement 8 of the Gate Burton Energy Park Order 2024.
		NE12 Nationally designated landscapes (C, O, D) The proposed development is not located within, or within the setting of any nationally designated landscapes. As a result, NE has no specific comments to make on landscape implications of this development. NE welcome the applicant's response to NE's previous comments on Landscape, as detailed in Table 6.1 of the ES. We welcome the applicant's measures to relate to prevailing character, such as the retention of field boundary vegetation and drainage channels. NE welcome the reference to Natural England's National Character Areas and other Local Landscape Character Assessments within Chapter 6 of the ES. Nonetheless, NE note the significant number of solar developments in Lincolnshire; the	It is noted that Natural England has no specific comments to make in relation to potential effects on nationally designated landscapes.

		examining authority should have regard for the landscape character of the area during the examination.	
		Soils and best and most versatile agricultural land **NE13 ALC Survey Methods (C, O, D)** Natural England has reviewed the ALC surveys undertaken by the applicant. The full detailed resolution of the survey (1 auger boring per hectare) is welcomed for both the Solar Array Area and Bespoke Access Corridor. Natural England note within ES Chapter 14, para14.4.7 that a detailed soil survey has not been carried out for the Cable Route Corridor & Bicker Fen substation extension works at the time of this assessment. It is noted in para 14.6.8 that a detailed soil survey of the Cable Route Corridor will be carried out preconstruction to inform the site-specific SMP. It remains Natural England's advice that there is a risk of soil damage, ALC degradation and long term or permanent loss of BMV from cable installation without proper soil management practises. Natural England therefore advise that a full ALC survey is required across the full site, including Cable Route, to inform avoidance, soil management and reinstatement. NE advise these surveys should be undertaken pre-consent, to inform micro-siting & avoidance of the highest quality agricultural land as far as practicable along the cable route, in line with the established principles of the Mitigation Hierarchy (i.e. avoid, then mitigate, then compensate) and NPS EN-1 paragraph 5.11.12: '*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5*)'. **Natural England request that ALC survey of the Grid Connection Corridor should be carried out to inform micro-siting of the connection corridor and other potentially damaging activities away from BMV land, as far as reasonably practicable.** **NE14 ALC Survey Results (C, O, D)** The ALC survey results have been presented within ES Chapter 14 and split into the ALC grades within each area surveyed: Solar Array Area, Bespoke Access Corridor and Preliminary Cable Route. The detailed ALC survey results indicate that across the Proposed Solar Array Area 47.4% (250.12ha) is categorised as BMV land. Within the Bespoke Access Corridor, detailed ALC survey results indicate 85.2% (38.68ha) is categorised as BMV land. Provisional data indicates that the Cable Route Corridor consists of potentially 100% (183.89ha) of BMV land. In total, 20.37ha of 'permanent' development is proposed on BMV agricultural land. Table 14.13 presents a breakdown of land use across the Solar Array Area, Bespoke Access Corridor and Cable Route Corridor (provisional), broken into temporary and permanent land loss, and by ALC grade. This is welcomed, however, Natural England query the omission of Mitigation/ Enhancement areas within the breakdown, as requested in our S42 response. Natural England note that the survey for the Cable Route Corridor is to be undertaken post-consent and therefore has relied on provisional data for the assessment. NE note the applicant has used Natural England's	Based on the provisional ALC data, a Very High sensitivity was assigned for the Cable Route Corridor within **ES Chapter 14 Soils and Agricultural Land (APP-065)**. This is the highest level of sensitivity that can be applied in accordance with the relevant guidance (IEMA (2022) 'A New Perspective on Land and Soil in Environmental Impact Assessment'). Therefore, the submitted assessment already presents a worst-case scenario, and the reported effects could not be increased through the results of a detailed soil survey. As set out in **ES Chapter 14 Soils and Agricultural Land (APP-065)**, with the embedded mitigation measures it is assumed that any loss of land resulting from laying the cable within the Cable Route Corridor along with the temporary access tracks would be temporary, as the land will be reinstated to agricultural use following construction. Given that construction compounds will only be required for the duration of the trenching, these have been assessed as being temporary impacts, unlike the Solar Array Area compounds which will be required for a longer period of time. As such, it is considered unnecessary and disproportionate to undertake ALC surveys along the Cable Route Corridor pre-consent. However, ALC surveys will be undertaken pre-construction, which will inform a detailed Soil Management Plan and ensure the land can be returned to agricultural use. The Cable Route Corridor has been designed wider than the working width for the cable trenches to allow for routing to factor in the various planning, environmental and technical constraints that need to be considered. With regards to BMV land specifically, the results of the Cable Route Corridor ALC survey, which will be carried out pre-construction, will identify the grading of the land. All factors will be considered together and the use of higher-grade land will be avoided, where practicable, having regard to the purpose of the infrastructure (in line with NPS policy). Within the Construction Compound areas, lower quality land will be used for the siting of design features involving soil disturbance, where possible and proportionate. **Appendix 14.4 Outline Soil Management Plan 2024 (APP-176)** has been submitted, and a detailed version is secured by requirement in **the Draft DCO (AS-008)**. The above will ensure the route will be designed and constructed in accordance with the Mitigation Hierarchy**,** with impacts on the soil structure and quality of land within the Cable Route Corridor mitigated, where possible. **Cable route installation is a temporary activity, with works in any given area lasting only a short period before the land is reinstated to agricultural use once the cable has been laid and the trenches backfilled. While installation across the full route will take place over 12 to 24 months, the impact on agricultural land at any one time is likely to last a few weeks and leave no lasting effect. few weeks and leave no lasting effect.** As noted above in response to NKDC (RR-004), the areas of green infrastructure in the landscape strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will have no detrimental impact on soil quality or the future agricultural capability of land. The proposed grassland and meadow habitats will be returned to arable agriculture through standard cultivation methods after decommissioning with no negative impact on the soil. All areas of tree and hedgerow planting are proposed for field margins and areas not currently in agricultural use, and no new

		1:250,000 provisional ALC data. This map is designed to give an indication of land quality at a strategic level. It does not show the breakdown of Grade 3 into Subgrades 3a and 3b, and it has a minimum map unit of 80ha. Consequently, it is not suitable for site specific assessments, for which a more detailed field survey is required (see above). **Land take for ecological enhancements/ mitigation should be presented.** **NE15 Embedded Mitigation & Avoidance of BMV land (C, O, D)** It is noted that efforts have been made to avoid Best and Most Versatile Land during the site selection process (para 14.13.11). Para 14.13.12, ES Chapter 14 states that ALC grading was also considered in siting the BESS and onsite substation within the Solar Array Area in order to avoid hard development on Grade 2 quality land. This is welcomed by Natural England. However, para 14.6.4 states the built development is mostly situated on a mixture of Subgrade 3a and Subgrade 3b and avoidance of BMV land is considered to be unavoidable due to the 'site layout and design constraints'. It does not appear that the results from the ALC surveys have been utilised to micro-site away from BMV land. Natural England therefore require further rationale for the siting on BMV land. Further information should be presented to illustrate how this has been used to minimise impacts to BMV land as far as reasonably practicable. In particular, any permanent elements of development should seek to avoid BMV. Table 14.13 clearly indicates 'permanent' elements of development with an asterisk *, however no further rationale is provided in relation to the siting of these parts of the development in relation to BMV land. Natural England refer the applicant to NPS- EN-1, paragraph 5.11.12 which states the following '*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)*'. **Further information should be provided to illustrate how the ALC survey results have been used to avoid BMV land wherever possible.** **NE16 Permanent loss of BMV land (D)** Chapter 14 of the ES indicates that based on worst case scenarios, there is a permanent loss of 14.25ha if BMV land due to Built Environment within the Solar Array Area. Within the Cable Route Corridor, the predicted permanent loss of BMV land which is to be removed from agricultural production is 2.7ha. The permanent loss of BMV agricultural land to be removed from agricultural production within the Bespoke Access Corridor is 3.98ha. This is a total of 20.37ha. Natural England would always advise that BMV land should be avoided wherever possible for permanent development, to safeguard the long term agricultural potential of the land. Any actions which compromise options for the future use of the land, or which undermine its inherent capability should be avoided. As noted above, Chapter 14 does not consider the effect of ecological enhancements/mitigation areas on agricultural land. Whilst most ecological enhancements will be able to retain the BMV resource for the lifetime of	woodland is proposed. Furthermore, most of the grassland and meadow habitats areas are already accounted for in the assessment as they are included within the areas of temporary land take under and surrounding the solar panels (Table 14.13 of **ES Chapter 14 Soils and Agricultural Land (APP-065)**). Including the areas of green infrastructure in this case would, therefore, result in overestimating the area temporarily removed from agricultural production. Within the PEIR response, as detailed in Section 14.3 of the **ES Chapter 14 Soils and Agricultural Land (APP-065)**, Natural England recommend further breakdown of land take into permanent and temporary land take and the proportion/amount of BMV and non-BMV land take for each element of the development. Land take is broken down into permanent and temporary land take for BMV and non-BMV land in Section 14.5 of **ES Chapter 14 Soils and Agricultural Land (APP-065)**. In relation to the request for the land take for ecological enhancements to be presented, the majority of land within the Solar Array Area is multi-functional (e.g. ecological enhancements include the creation of grassland below solar panels). Therefore, it is considered that the breakdown provided within Section 14.5 is the most appropriate approach. **ES Chapter 14 Soils and Agricultural Land (APP-065)** sets out how the Applicant has sought to avoid and reduce the amount of BMV land used for hard infrastructure associated with the Proposed Development. However, given the context of the quality of land locally and within the Order Limits, it has not been practicable to avoid all BMV. Other factors included safety, noise and drainage, as set out in Design Objectives SAA3 and SAA7 in Table 4.1 of the **Design and Access Approach Document (APP-278)**. Further information is also included in Section 3 of **ES Chapter 3 Alternatives and Design Evolution (APP-054)**. As mentioned in response to a similar comment made by NKDC (RR-004), the proposed tree planting is within field margins and not within existing areas of productive agriculture, with the purpose of being used as visual screens and to increase ecological connectivity. Other areas of ecological enhancement (i.e. grassland and native shrubs) can be returned to agricultural land. Therefore, there is no need to consider permanent agricultural land loss for the areas of ecological enhancement. Following decommissioning, the soils will be reinstated to match the baseline soil profile characteristics of soil type, horizon depth and soil structure. The resulting ALC grade is dependent on future climatic conditions. Returning to the previous ALC grade is only possible if the climatic data set for ALC grade calculations remains constant, and climatic interactions such as soil water regime and flooding are also the same as the baseline conditions. Both are external factors that cannot be controlled by the Applicant. External management from the local drainage boards is also a key requirement for the soils within the order limits retaining their ALC grade. Returning soils to their previous ALC grade would therefore also require the drainage boards maintaining the required water table levels. For these reasons, it is not possible for the Applicant to take on responsibility for attaining a specific ALC grade some years in the future, but instead can take on responsibility for a particular good practice process of soil management.

		the development, where enhancements require intrusive groundworks, or include deep rooting species (i.e. woodland), this can lead to a permanent loss of BMV resource. NPS-EN1 paragraph 5.11.34 states: '*The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification*'. NE consider this permanent loss of BMV land has been appropriately assessed within the ES, being attributed a 'significant (major adverse)' effect on agricultural land use during the Construction Phase. (ES Table 14.15, Chapter 14). **Further information should be provided to illustrate how the ALC survey results have been used to avoid BMV land wherever possible, with justification provided where it was unavoidable. This should particularly include comments regarding consideration given to the siting of the permanent elements of the proposal away from BMV land (both built development and permanent ecological enhancements), so as to avoid compromising options for the future use of BMV land, or undermining its inherent capability.** **NE17 Time Limit (D)** Natural England welcome the inclusion of a 40 year maximum operational lifespan for the solar arrays and BESS, as detailed in Chapter 2 of the ES. The inclusion of the time limit within the DCO provides further certainty the proposed temporary land use changes will remain temporary as described, subject always to appropriate soil management. **Requirement 18 of the draft Development Consent Order secures the 40 year operational period of the proposed development.** **NE18 oSMP (C, D) – Soil handling** Table 14.13 illustrates a significant area of BMV land is to be occupied by both Solar PV development, and supporting infrastructure, for the lifetime of the development. This emphasises the importance of the Soil Management Plan, to mitigate the risk of permanent loss or damage to BMV land. Natural England welcome the content of the Outline Soil Management Plan (oSMP). NE welcome the inclusion of rainfall "stop" criteria meaning soil handing must take account of prevailing weather conditions in order to minimise the risk of damage to soil structure (4.1.5). NE also welcome the proposal which states that '*where possible, the work is phased so that construction elements involving soil trafficking, stripping, handling and formation of stockpiles is avoided during periods of the year where the soils are most likely to be in a wet state (December to March*)' (4.1.5). It is NEs advice that all soils should only be handled in a dry and friable condition, and it is expected that construction programmes would restrict soil handing to the drier summer period to minimise the risk of soil damage (April through September) as far as reasonably practicable. This would minimise the possibility for on-site delays due to rainfall in the winter period, as well as the need to recondition soil, which requires additional space and time. This is particularly important for land to be restored to agricultural use.	

		Requirement 16 of the draft Development Consent Order secures the creation and implementation of the Soil Management Plan, which is to be 'substantially in accordance with' the oSMP. **NE19 oSMP (D) – Reinstatement** Section 7.6 of the oSMP states that 'By following the measures included below, impacts on the agricultural capability of the land can be mitigated and the Site can be returned to agricultural use after decommissioning' (7.6.1). NE advise that this reinstatement commitment should specify that all agricultural land to be restored will be returned to its original ALC grade, informed by the pre-development ALC surveys. **Applicant to update the oSMP to make clear commitment to restoring the original ALC grade of all restored agricultural land. Requirement 16 of the draft Development Consent Order secures the creation and implementation of the Soil Management Plan, which is to be 'substantially in accordance with' the oSMP.**	
		NE20 Ancient woodland and ancient/veteran trees Natural England welcome the additional information regarding the results of the Arboricultural Impact Assessment as detailed. Natural England welcome the additional information regarding ancient and veteran trees that have been identified on Site following Arboricultural Impact Assessment. NE welcome 11.1.9 of Appendix 6 which states that all veteran trees and the transitioning veteran tree are to be retained and protected during construction (and subsequent decommissioning) activities associated with the Proposed Development. NE welcome the embedded mitigation measures including a veteran tree buffer zone. Para 11.1.15 states that measures to ensure tree protection will be secured post-consent in the detailed CEMP and DEMP. **Requirement 12 and 18, of the draft DCO secures the relevant management plans, namely the CEMP and DEMP.**	It is noted that Natural England welcome the further detail provided by the Applicant and have presented no further comment.
		NE21 Connecting people with nature Natural England note in para 15.5.23 of Chapter 15 of the ES that there are no accessible PRoW within the Solar Array Area, but there are PRoWs crossing the Cable Route Corridor and the Bespoke Access Corridor. NE welcome the embedded mitigation in Table 15.2 which states that for temporary closures of PRoWs, signs and posters will be installed on relevant PRoWs and local walking groups, relevant parish councils and district councils will be notified regarding any temporary footpath closures through the Community Liaison Officer. This consideration to PRoW is welcomed by Natural England. Chapter 7 of ES states that '*The final Site is to include a permissive path. This will be linked with ecological corridors as outlined in the Biodiversity Opportunities Plan and detailed in Section 7.8. Along the permissive walkway the Applicant will erect information boards to provide the public with information on local wildlife*'. Further details of the permissive path are included in Chapter 6 which states that PRoW Ewer/12/1 is being enhanced as a permissive path and will be in place for the operational duration of the project with plans for a small footbridge to be created over the watercourse. Natural England welcome the consideration of and introduction of new permissive path.	It is noted that Natural England welcome the mitigation proposed in relation to PRoWs and permissive paths.
RR-002		**Minerals and Waste Safeguarding**	The Applicant has noted this comment.

	Lincolnshire County Council ('LCC')	As shown on Figure 9: Existing Minerals and Waste Sites (North Kesteven District) map of the Lincolnshire Mineral and Waste Local Plan (LMWLP), the site area intersects (at northernmost corner of site) with a Minerals Safeguarding Area (MSA) for sand and gravel. There are no existing site specific safeguarded mineral or existing waste sites within or in close proximity to the site. In light of the MSA, Policy M11 of the LMWLP technically requires the developer to provide a Minerals Assessment. However, in line with our Scoping Opinion letter of 16th May 2023, the Council's view is that "there is no requirement to undertake a minerals assessment for this project". The Council has no further comments on minerals and waste safeguarding at this stage. If there is need for further update this will be included in the LIR.	
		Waste Management Whilst waste was scoped out of the ES as a separate chapter, we welcome the inclusion of the Waste and Recycling Strategy [APP-189] which the Council previously requested. The Council will highlight several concerns and specific points regarding the strategy and assumptions outlined in this document. The Council will also have some points of detail in relation to the lack of current capacity for recycling solar panels, particularly at decommissioning, but also with operational failures and cumulative impacts alongside other proposed Nationally Significant Infrastructure Projects (NSIP) scale solar farms, particularly in terms of waste management capacity. These will be picked up in the LIR, through discussions with the applicant and the Statement of Common Ground (SoCG).	Noted; the Applicant will address such comments as necessary in response to the LIR and through the SoCG discussions.
		Landscape and Visual On behalf of Lincolnshire County Council (LCC), and North Kesteven District Council (NKDC), AAH Consultants have reviewed the relevant Landscape and Visual elements of the Beacon Fen Energy Park application to provide initial comment to be incorporated within a Relevant Representation statement from both LCC and NKDC, and is set out in full below. Beacon Fen is located within Lincolnshire, within the administrative area of NKDC but approximately 10% of the works fall within the Boston Borough Council area, which is limited to the southern extent of the Cable Route Corridor. However, from a landscape and visual perspective, due to the scale of the proposed scheme it has been considered in its entirety, with views and wider landscape effects from all areas of jurisdiction being considered. A full review of the landscape and visual elements of the scheme is currently being carried out, but this Technical Memorandum summarises our initial comments. This full review will be included within the individual LIR submitted by LCC and NKDC later in the examination process. This will include a review of the submitted Landscape and Visual Impact Assessment (LVIA) chapter and associated appendices and figures of the Environmental Statement (ES) to Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), 10th January 2020, by the Landscape Institute (LI).	Noted; the Applicant will respond to the full review of the Landscape and Visual aspects of the submission when this is available.
		Landscape Effects	It is recognised that at a local level the agricultural character of the Site will be diminished, but it has been found that the characterising influence of solar

		As a result of its mass and scale, it is clear that the proposed development would lead to some Significant Adverse effects upon the existing landscape and visual baseline, which is reflected within the submitted LVIA. The development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect wider landscape character, at a regional or county scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character, that are defining characteristics of the area. We are particularly concerned with identifying the landscape character effects through changes to the land use over an extensive area of agricultural land. Significant landscape effects are subsequently identified within the LVIA chapter with the identification of Significant adverse effects at a Site level and to Published Landscape Character Areas at Construction, Year 0 Operation and Year 15 Residual. The assessment judges that the only Significant Residual landscape effects are at Site level, with Significant effects on the Fenland and Holland Reclaimed Fen Sub Areas at Construction and Operation reduced after 15 years to Not Significant. While these Significant effects are of a concern, the judgement within the LVIA appears to be well reasoned, but a more detailed review will interrogate these findings and alignment with the methodology.	development will not be strongly perceived beyond the immediate context of the Solar Array Area. This finding is confirmed in **ES Chapter 6 Landscape and Visual (APP-057)**, where effects on the host Fenland Sub Area would reduce to Minor adverse (not significant) at year 15 following establishment of mitigation planting. Effects on the Holland Reclaimed Fen will also reduce to not significant levels following establishment of replacement planting following completion of works in the Cable Route Corridor.
		Visual Effects The scale and extent of development would also lead to Significant Adverse effects on views from visual receptors, resulting in a change to the views experienced of an agricultural or rural landscape to a landscape containing large scale solar development. The development has been identified in the LVIA chapter as resulting in a Significant change to a variety of visual receptors at Construction, Year 0 Operation and Year 15 Operation. Significant Residual visual effects largely arise from sensitive users in close proximity to the development where it is not possible to sufficiently screen views of the development. While we acknowledge that the new planting and habitat creation will be valuable assets within the context of the surrounding agricultural landscape, they are part of a large-scale solar development. The planting, if it establishes as predicted, will also go some way in screening and integrating proposals in views. However, we note that the reduction in Significant landscape and visual effects predominantly relies upon the successful establishment of the planting scheme.	It is acknowledged that the reduction in significant landscape and visual effects over time is dependent on the successful establishment of the landscape scheme as illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**. However, the following measures have been adopted to maximise the likelihood of successful establishment: • The tree and shrub species specified have been informed by consideration of existing planting within the Site and wider landscape context which is successfully established and providing a positive influence on landscape character; • Consideration has also been given to climate change resilience through the specification of a diverse range of species in accordance with good practice guidance (Forestry Commission: 'Managing England's woodlands in a climate emergency' (March 2020)), and; • **Appendix 6.7 Outline Landscape and Ecological Management Plan (OLEMP) (APP-089)** sets out measures in relation to the establishment and longer-term management of the landscape elements which will progressively provide landscape assimilation. A detailed version of the OLEMP is secured by requirement in the **Draft DCO (APP-038).**
		Cumulative Effects The cumulative landscape and visual effects of the proposed development are considered in Chapter 18 of the ES, specifically in Table 18.3, which concludes that there are no cumulative landscape and visual effects. While a 5km study area has been utilised for schemes to be considered for Inter-Project landscape and visual effects, due to the extent and proximity of additional NSIP scale solar schemes in the area, we would suggest the examination is utilised to explore the potential for significant effects from	**ES Chapter 6 Landscape and Visual (APP-057)** provides an assessment of cumulative landscape and visual effects at construction, operation and decommissioning. In relation to the schemes identified at scoping stage, it has been found that there will be no significant cumulative landscape or visual effects. All NSIPs in Lincolnshire, including Springwell Solar Farm, Leoda Solar and Fosse Green, were included within **Appendix 4.2 Cumulative Assessment Short List (APP-082)** for consideration within the ES following consultation with local authorities. These were reviewed in the context of the Landscape and Visual

		these schemes. Schemes further afield, such as Springwell Solar, Leoda Solar and Fosse Green, are also of concern, despite the intervening distances between these developments. We have concerns regarding effects on the national, county and regional landscape character areas. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing multiple schemes across potentially several kilometres, albeit with gaps between some of the projects. However repeated views and presence of large scale solar would combine over time to create a greater perception of change. To calibrate this change to the landscape, these schemes combined, if built, would clearly require the update of any published landscape character assessment, including at a national level (NCA's), so as to include large scale solar as a defining land use characteristic as well as agriculture. This is a clear and marked change to landscape character, and several schemes have already been approved, with many in the planning system. It should also be noted that other renewable and energy infrastructure projects (such as Solar, BESS, Hydrogen, Pylons and cables along with associated infrastructure) are planned in the region, including NSIP and DCO schemes as well as Town and Country Planning Act (TCPA) scale projects, which together will change the character of the wider landscape.	Assessment and scoped out of further cumulative assessment. It was considered that significant landscape or visual cumulative effects were not likely in combination with these schemes because of the limited intervisibility, separation distance and lack of the potential for a visual effects pathway to result in significant cumulative, sequential effects. It is noted that these schemes are located a minimum of approximately 10km, 19km and 16km to the northwest of the Proposed Development. This represents a considerable separation distance limiting the likelihood of intervisibility and the consequent potential for combined effects to occur. At a national character level, the Proposed Development is predominantly located within NCA 46 **(Figure 6.5 Landscape Character (APP-207)** the Fens, with a small part of the Solar Array Area and the Bespoke Access Corridor being located within NCA 47 Southern Lincolnshire Edge. This further reduces the potential for cumulative landscape effects to occur in association with the specified schemes which are located within NCA 47 Southern Lincolnshire Edge and NCA 48 Trent and Belvoir Vales. At a local landscape character level, it is acknowledged that the Proposed Development in isolation would have a Moderate adverse (Significant) effect at year 0 on the host Fenland Sub Area. This would reduce to Minor adverse (not significant) at year 15 following the establishment of mitigation planting which would reduce the extent of characterising influence across the LCA. Considering other relevant schemes, the level of cumulative landscape effect on the Fenland Sub Area would be as assessed for the Proposed Development in isolation. Although not formally assessed, the specified schemes are not anticipated to contribute further to cumulative effects because of the considerable separation distance and limited intervisibility reducing the potential for simultaneous or sequential cumulative effects. The potential for sequential, cumulative effects to be experienced is considered in **ES Chapter 6 Landscape and Visual (APP-057).** The LVIA has found that there would no significant sequential cumulative effects at operation. Although significant effects would be experienced by users of short sections of the local road and PRoW network in relation to views of the Proposed Development in isolation, these users are sufficiently visually and physically disconnected from views of schemes considered in the cumulative assessment so that users are unlikely to experience a strong visual association between the Proposed Development and other relevant developments. In relation to schemes beyond the LVIA Study Area including: Springwell Solar Farm, Leoda Solar, and Fosse Green, the separation distance is such (10km+) that it is highly unlikely that the limited number of visual receptors experiencing views of the Proposed Development will have a sequential visual experience which results in the perception of an association between the Proposed Development and the specified solar schemes such that they become a defining characteristic of these routes.
		Mitigation & maintenance The Solar Farm would evidently deliver landscape and ecological improvements through mitigation areas and planting. However, this will be dependent upon the information set out in the Outline Landscape and Ecology Management Plan and Figure 6.31 Landscape Strategy Plans which illustrate the mitigation, which should be further explored, and we assume would be refined at the detailed design stages.	**Appendix 6.7 Outline Landscape and Ecological Management Plan (OLEMP) (APP-089)**) sets out measures in relation to the establishment and longer-term management of the landscape elements which will progressively provide landscape assimilation. Section 1.3 of **Appendix 6.7 OLEMP (APP-089)** sets out the commitment to refine the design of the proposed mitigation measures at the detailed design stage should the DCO be granted for the Proposed Development. Paragraph 1.3.5 sets out the obligation to prepare the detailed LEMP(s) and have

		The DCO should include for approval of any subsequent detailed landscape and ecological mitigation scheme (planting works), as referenced in Schedule 2 of the DCO. This should clearly link to any landscape mitigation scheme that is submitted as part of the scheme, and subsequently that which has been assessed as part of the LVIA. This should not just be a management plan, but a detailed landscape scheme clearly identifying plant species, numbers and specifications along with planting details. The DCO should also include for an appropriate period of landscape maintenance, that ties into a period of time identified in the Outline Landscape and Ecology Management Plan, and would expect an initial 15-year period of management and maintenance as a minimum, which would align with the assessed residual landscape and visual effects. This would subsequently be regularly reviewed and monitored at a reasonable period, such as every 3 to 5 years and implemented for the lifetime of the project. This should include for a reasonable plant replacement program, such as following a significant loss or failure to thrive, to ensure the planting scheme meets the aims and objectives laid out in the submission.	this/these approved by the relevant planning authority, is secured through a Requirement in Schedule 2 to the **Draft DCO (AS-008)**. **Appendix 6.7 OLEMP (APP-089)** includes detailed prescriptions for the 5-year establishment maintenance period together with longer-term management objectives and monitoring arrangements to cover the lifetime of the Proposed Development. These measures will be included and further developed in the detailed LEMP, which will be subject to approval by the relevant local planning authority prior to the commencement of the Proposed Development and so will be discussed and agreed in that context.
		Control of vegetation removal Proposed vegetation removal is identified within the Draft DCO, Figure 6.32 Vegetation Removal Plans and Appendix 6.6 Arboricultural Impact Assessment. Clear vegetation removal processes should be put in place to ensure any vegetation loss is aligned with these plans and schedules and further removal or works is agreed with the relevant parties prior to any works being carried out. This should clearly relate to vegetation removal plans and AIA, and this must also include vegetation removal or works to facilitate wider highways and access works, such as for abnormal loads.	**Figure 6.32 Vegetation Removal Plan (APP-236 to APP-238)** is included at Schedule 12: Documents and Plans to be Certified in the **Draft DCO (AS-008),** with the underlying detail referenced within Schedule 13 (Hedgerows) to the **Draft DCO (AS-008)**, as authorised by Article 43. These provisions set the narrow parameters for the exercise of the powers, including by reference to the Vegetation Removal Plan, and is well precedented in many made DCOs, including the Sunnica Energy Farm Order 2024 and the Gate Burton Energy Park Order 2024. No additional control is considered appropriate or necessary in this context.
		Archaeology The Council are satisfied that the work undertaken to date has been completed to the required standards and has provided an understanding of the archaeological potential, significance and likely impact arising from the proposed Beacon Fen Energy Park. There has been an effective programme of desk-based and non-intrusive surveys completed for the site prior to submission of the Application. The Applicant has completed the desk based assessment [Chapter 8: Cultural Heritage Document Ref 6.2 ES Vol. 1, 6.2.8 and Appendix 8.1 Archaeological Desk Based Assessment Document Reference: 6.3 ES Vol.2, 6.3.45], aerial assessment [Appendix 8.3 Aerial and LiDAR Assessment – Solar Array Document Reference: 6.3 ES Volume 2, 6.3.47 and Appendix 8.4 Aerial and LiDAR Assessment – Access and Cable Routes Document Reference: 6.3 ES Volume 2, 6.3.48] and geophysical survey [Appendix 8.6 Geophysical Survey Summary Report - Solar Array Part 1 Document Reference: 6.3 ES Volume 2, 6.3.50-71e] to the appropriate standards set out by the Chartered Institute for Archaeologists, Historic England and the Lincolnshire Archaeology Handbook. Consultation and communication has been effective and timely, with feedback and comments incorporated into the documents. This has benefitted the archaeological assessment, improved the methodology employed and enhanced the end output.	LCC have received a revised version of **Appendix 8.11 Archaeological Mitigation Strategy ('AMS') (APP-153)** and are currently undertaking a review of the document to agree the approach outlined within the AMS. It has been agreed that the evaluation throughout the Solar Array Area has been completed, and the results have been fed into the AMS to ensure a robust mitigation strategy across the Proposed Development. The non-intrusive and intrusive evaluation across the Bespoke Access Corridor has been carried out to understand where to avoid and where to record, as necessary. The non-intrusive evaluation across the Cable Route Corridor has provided a good baseline for targeted trenching and therefore appropriate mitigation depending on the results from the trenching. The majority of this work, including geophysics, LiDAR and Aerial Photographic analysis and review of the Historic Environment Record ('HER') data, has enabled an avoidance of areas of identified archaeological significance, therefore reducing impact and further intrusive archaeological works. Where impact is unavoidable, archaeological recording will be undertaken agreed with LCC within the AMS. It should be noted that consultation with LCC on the AMS has provided a staged approach to mitigation. Within the Cable Route Corridor, there will be targeted trenching followed by targeted excavation. Within the Bespoke Access Corridor, there will be targeted monitoring and recording based on evidence provided by non-intrusive survey data and targeted trenching. Within the Solar Array Area, the evaluative approach has used multilayered, non-intrusive survey followed by targeted trenching. Areas containing significant archaeological potential based on survey data have been mitigated by design, these areas have been avoided.

		Although not totally due to logistical and access issues, the scope of the archaeological fieldwork [Appendix 8.10 Trial Trenching Report - Solar Array Appendix 6.3.73 and Appendix 8.10b Trial Trenching Report - Targeted Area on the Access Route Appendix 6.3.74] has been extensive and the Applicant has committed to undertaking further fieldwork post-DCO, within the areas where access was not possible during the fieldwork season. The trenching has been undertaken within the solar array area and the bespoke access corridor and is proposed for the cable route corridor. The trenching to date has recorded a number of areas of archaeological interest dating from the later prehistoric period through to the post-medieval period and has successfully characterised and dated many of the features identified from the desk-based, aerial and geophysical assessments. This has meant that the design has been informed directly through archaeological data and has taken into account areas of dense, complex and significant archaeology within the embedded mitigation. The embedded mitigation has been developed following the programme of non-intrusive and intrusive archaeological assessment. This has meant that mitigation by design has been incorporated at an early stage and pre-DCO submission. The Council therefore considers that there will be sufficient baseline data to inform the final archaeological mitigation strategy (AMS), with a draft version of this available [Appendix 8.11 Archaeological Mitigation Strategy Document Reference: 6.3 ES Volume 2, 6.3.74]. The AMS included targeted trial trenching of the cable route corridor, targeted excavation, likely either strip, map and record or strip, map and sample and areas where it is likely that archaeological monitoring will be undertaken during construction. The AMS sets out the requirements and scope of works for further archaeological intervention, with site and task-specific Written Schemes of Investigation being produced by the Applicant and approved by the Council. This is to be secured by the draft DCO Requirement 11. Feedback on the approach set out within the draft AMS has been provided to the Applicants archaeological consultant and an updated AMS is due to be issued shortly. We have expressed a requirement for a public archaeology and community engagement strategy to be included in the AMS. We look forward to working with the Applicant going forwards in ensuring an effective approach to understanding, managing and mitigating the archaeological risk that will occur and maximising the public benefit that will be gained from the archaeological work.	
		Traffic and Access The Council in its capacity as Highway Authority has reviewed the application documents for this proposal. **Appendix 9.1 Transport Assessment (TA) [APP-155 -157]** The methodology for the assessment was agreed at pre-application discussions with the Applicant. The volumes of traffic estimated for the construction period seem reasonable and it is agreed that there would not	An online meeting was held with LCC highways on 10 September 2025 to discuss the requirement for mitigation in the form of passing places on Carterplot Road and Great Hale Drove. This was informed by a Technical Response to LCC's Relevant Representation Note which summarised the traffic impacts of the Proposed Development, which are also summarised in **Appendix 9.1 Transport Assessment (TA) (APP-155 to 157)**. LCC confirms it agrees with the conclusions of the technical note and are content for the Applicant not to provide a passing places scheme. The Technical Response to LCC's Relevant Representation Note

		be a capacity issue on the highway network resulting from these proposals. The main site would be served by a new haul road from the A17. Most of the construction traffic would not use minor local roads and would access the site from the A17. There are, however, some vehicles which would need to access Compounds 3 and 4 (Para 4.6.3, Table 4.2). These vehicles would use Carterplot Road and Great Hale Drove which are single tracked roads and not suitable for 2 way movements. Mitigation will be required in the form of passing places to be provided along these two roads. There was a recent planning application (Ref 23/1021/FUL) for a 49MW solar farm in this area to North Kesteven District Council (NKDC) which proposed using these roads for construction vehicle access, the application was refused by NKDC (and is currently subject to an Appeal). However a scheme of passing places was proposed for that development and the Council would expect a similar scheme to be proposed for this development. Detailed layouts of proposed accesses with visibility splays and swept paths are shown in Appendix E of the TA. These accesses will need to be subject to Section 184 applications under the Highways Act in the event that the DCO is granted. The Streets, Rights of Way and Access Plans Document Reference: 2.5 [APP-011] show the DCO limits, street work limits and access points.	is submitted as an Appendix to this document (**9.2 Applicant Responses to Relevant Representations**) submitted at Deadline 1. Following the meeting and reaching agreement with LCC on outstanding matters, it is concluded that this Relevant Representation is resolved. This will be reflected in the SoCG with LCC. It is proposed to manage traffic associated with construction of the Proposed Development in accordance with the measures described in **Appendix 9.3 Outline Construction Traffic Management Plan (OCTMP) (APP-159)** which has been submitted with the DCO application. LCC is the relevant approval body for the CTMP as secured via Requirement 13 of the **Draft DCO (AS-008)**. LCC will therefore be consulted on the detail to be included within the CTMP. It is acknowledged that technical details for works in the public highway such as the accesses and agreed mitigation will need to be agreed with LCC's Section 184 team and S278 Minor Works team. This is controlled by Requirement 13 of the **Draft DCO (AS-008)** for the CTMP to be approved by LCC.
		Outline Construction Traffic Management Plan Document Reference: 6.3.78 ES Appendix 9.3 [APP-159] This document includes outline proposals such as hours of operation, traffic routing, inspection surveys, parking and access, wheel washing etc.. Included also is the Travel Plan and Delivery for AIL. All these measures will be required and need to be monitored and enforceable, such that the assumptions underpinning the Transport Assessment are maintained. Access proposals are included in Section 2.3 of the Construction Traffic Management Plan (CTMP), these are appropriate at this stage. However, the technical details for works in the public highway such as the accesses and agreed mitigation (e.g. Passing places) will need to be agreed with LCC's Section 184 team and S278 Minor Works Team and the CTMP should reference that future Technical approvals will be required.	It is acknowledged that technical details for works in the public highway such as the accesses and agreed mitigation will need to be agreed with LCC's Section 184 team and S278 Minor Works team. This is controlled by Requirement 13 of the **Draft DCO (AS-008)** for **Appendix 9.3 Outline Construction Traffic Management Plan (OCTMP) (APP-159)** to be approved by LCC.
		Draft DCO [APP-039] There seems to be no reference to the Council's Permitting Scheme for highway works in this draft DCO. The Council have required articles added in other DCO, such as the Viking CCS (The Viking CCS Carbon Dioxide Pipeline Order 2025 https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN070008/EN070008-001535-Viking%20-%20DCO.pdf), which require the developer to follow the Council's Permitting Scheme and we would require similar for this proposal. Technical approvals of details for layouts of accesses and other works in highway (e.g. passing places) will need to be approved by LCC's Section 184 team and S278 Minor Works Team, this is controlled by Requirement 13 of the DCO for the CTMP to be approved by LCC. Any further comments will be provided in the LIR and the Council will seek to engage with the applicant regarding these matters.	The **Draft DCO (AS-008)** provides for powers to undertake necessary street works related to the Proposed Development. Where these are known and specified within a Schedule to the Draft DCO, the consent of the relevant street authority is not required because this detail is already confirmed through the consenting process. Where such works are unspecified, the reliance on street powers is subject to street authority consent. Article 17 of the Draft DCO makes specific provision for agreements with street authorities. This provides for engagement and agreement with a street authority on works anticipated and the scope of what such agreements would cover is set out in the wording of Article 17. Paragraph (3) of Article 11 clarifies that where the Applicant undertakes any street works, it must still comply with certain elements of the New Roads and Street Works Act 1991, including the requirement to provide a prescribed advance notice to the street authority of any such works.

			On this basis, the Applicant considers that LCC will have sufficient visibility and control over the street works required as part of the Proposed Development without a requirement for specific adherence to a separate permitting scheme.
		Surface Water and Flood Risk The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal.	The Applicant has noted this response.
		Appendix 11.1 Flood Risk Assessment (FRA) [APP-062] The Council agree that the surface water flood risk (Section 5.5 and 6.3) from this proposed development is low. The haul road would be impermeable and would require mitigation to ensure flood risk is not increased (6.4.9). Section 8 of the FRA provides the Outline Drainage Strategy and the proposals here will keep run off to existing greenfield rates and comply with SUDs design hierarchy. Provided these measures are designed and implemented in accordance with this Outline Strategy then the surface water flood risk from the development would be acceptable.	Requirement 10 (Surface and foul water drainage) of the **Draft DCO (AS-008)** confirms that the drainage scheme must be substantially in accordance with the principles in the outline drainage strategy as described in **Section 8 of Environmental Statement, Appendix 11.1 Flood Risk Assessment (APP-162)**.
		Ecology **General comments** APP-058 (6.2.7 Chapter 7 Ecology) sets out the biodiversity and ecological elements of the Applicant's ES. A broad suite of ecological surveys and investigations have been undertaken by the Applicant. The results of these surveys have been used to inform the ES for the project and to be used in the development of any necessary mitigation measures. Surveys undertaken include: Habitat and botanical surveys including both terrestrial and aquatic habitats. Detailed surveys for protected and notable species, including great crested newts, reptiles, amphibians, breeding and wintering birds, bats, riparian mammals and terrestrial invertebrates. APP-058 identifies a range of potential ecological effects during the construction of the proposal. These include permanent loss or change of habitats, temporary loss or damage to habitats, impacts on protected and priority species ranging from disturbance to direct mortality. The potential for inadvertently encouraging the spread of invasive non-native species (INNS) is also considered and mitigation is proposed in the form of a Biosecurity Management Plan. During operations and maintenance, the main potential effect is likely to be disturbance of protected and priority species. Decommissioning impacts are predicted to be similar to construction impacts including disturbance and temporary loss of habitats. The Project is reliant on a package of avoidance, mitigation and enhancement measures to address the ecological impacts. To this end, the Applicant has prepared an outline Construction Environmental Management Plan (OCEMP) (APP-070), an oLEMP (APP-089) and an outline Decommissioning Environmental Management Plan (ODEMP) (APP-078). Measures proposed in the OCEMP, oLEMP and ODEMP will need to be secured in the DCO. A Commitments Register (APP-190) has been prepared which provides a helpful summary of how the mitigation identified for the Project including embedded and additional mitigation measures are secured.	The surveys outlined in **ES Chapter 7 Ecology (APP-058)** have identified ecological constraints and opportunities for enhancement. **Appendix 6.7 Outline Landscape and Ecological Management Plan (OLEMP)** (**APP-089**) and **Biodiversity Net Gain Strategy** (**APP-280**) set out how the enhancements can be created and managed in the long term. As set out in **ES Chapter 7 Ecology** (**APP-058**), there are protected and notable species on and around the site. **ES Chapter 7 Ecology (APP-058**) and **Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)** include mitigation measures which include producing a draft great crested newt licence (approved 23 September 2025), and commitment to update surveys closer to the construction date.
		Impacts on statutory and non-statutory designated sites	The Applicant has noted this response.

		The Applicant has undertaken desk studies and a search of information held by Lincolnshire Ecological Records Centre to identify important ecological sites in the vicinity of the proposal. There are three internationally important sites designated for biodiversity within 20km of the proposal and two nationally important sites designated for biodiversity with 10km of the Order limits. The location of these sites is shown in APP-239 and APP-240 respectively. A Shadow Habitats Regulation Assessment report (APP-050) has been prepared which concludes that with mitigation detailed in the OCEMP, there will be no adverse effects on the designated sites or their features. The Council has no reason to disagree with this conclusion however, the Planning Inspectorate will need to satisfy itself that sufficient information has been submitted by the Applicant to enable this conclusion to be reached. There are 10 non-statutory sites designated for biodiversity importance either within or within 2km of the Order limits. The locations of these non-statutory sites are set out in APP241. No significant effects on these sites are predicted.	
		Cumulative Effects There are a number of development proposals of varying scales in the vicinity of this proposal. These range from small scale housing developments to NSIP scale energy developments. Details of the approach to cumulative effects are presented in APP-069 and APP-058. The assessment concludes that there will be no significant adverse effects on ecology arising from cumulative impacts.	The Applicant has noted this response.
		Biodiversity Net Gain Given the scale and nature of the proposed development the Council will expect the project to deliver significantly more than 10% Biodiversity Net Gain (BNG). The Applicant has set out their approach to BNG in APP-280. This document sets out the likely level of BNG that the scheme is expected to deliver. Based on current plans, the Scheme is anticipated to result in a net gain of 36.43% for area-based habitat units, 10.79% for hedgerow units and 15.95% for watercourse units. At 5.1.1 of APP-280 the Applicant states that the delivery of these percentages, "…as a minimum…", will be secured through a requirement in the DCO. However, 2.3.8 of APP-089 states "…the Applicant is committing to delivering at least 30% biodiversity net gain for habitat units; at least 10% biodiversity net gain for hedgerow units; and at least 10% biodiversity net gain for watercourse units…". The Council encourages the Applicant to clarify the minimum level of BNG that will be delivered. The Council welcomes the Applicant's commitment to delivering BNG and agrees that these commitments will need to be secured in the DCO. The Applicant will also need to demonstrate that the commitments made to delivering BNG are achievable via the final LEMP. The Council encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically and welcomes ongoing engagement with the Applicant in relation to BNG. Further detailed comments on ecology and biodiversity will be provided in the LIR.	As discussed at the meeting with NKDC and LCC (14 August 2025), the Applicant has provided the minimum levels of BNG to be achieved in the **Biodiversity Net Gain Strategy (APP-280)** which are in line with or exceed 10%. **Appendix 6.7 Outline Landscape and Ecological Management Plan (OLEMP) (APP-089)** provides an outline approach to achieving the BNG targets and this will be finalised as the design is refined. The options to work with other developers for biodiversity enhancement will be explored as discussed at the meeting with NKDC and LCC (14 August 2025).

		Soils and Agricultural Land The potential impacts on Best and Most Versatile (BMV) agricultural land in respect of this scheme and cumulatively with other projects that are emerging/known about in Lincolnshire are of concern to the Council. The Council will seek to protect high quality agricultural land in Lincolnshire (Grades 1, 2 and 3a) from development in accordance with its Energy Infrastructure Position Statement adopted 5 December 2023 (Energy Infrastructure Position Statement https://lincolnshire.moderngov.co.uk/documents/s60096/Energy%20Infrastructure%20Position.pdf). Lincolnshire has the largest combinable crop output of any UK county, with about 12% of England's arable crop area. Its combination of climate, soil type and topography make the county ideal for a variety of crops with 437,591 ha of land given over to agriculture and horticulture in Lincolnshire, and producing by value circa 10% percent of England's cereal, 25% of vegetables and 14% of industrial crops (sugar beet, oil seed rape and protein crops). This has led to the area having the UK's leading concentration of fresh produce processors, traders and technology suppliers. This high level of production is vital to the county's economy, with a total crop output of over £1,564 million and a total livestock output of £555 million in 2023. To preserve fresh produce and minimise supply chain distance, highly productive food hubs have built up in the south of the county. The importance of this sector for the local economy is reflected in the number of jobs it generates with an agricultural workforce of 12,000. The overall Agricultural Land Classification (ALC) findings for the Beacon Fen proposal are set out in table 14.3 of Chapter 14 of the ES as summarised below: Solar Array Area: Total area: 529ha of agricultural land. Area under solar arrays: 395ha (including 191ha of BMV land, temporarily lost for 40 years). Permanent loss: 14.25ha of BMV land due to built development. Bespoke Access Corridor: Total area: 45ha of agricultural land. Construction phase: 18.91ha used. Operational phase: 3.98ha permanently sealed over. Permanent loss: 2.70ha of BMV land. Temporary loss: 12.94ha of BMV land during construction. Cable Route Corridor: Total area: 183ha of agricultural land. Estimated usage: 39ha for cable route, 13.71ha for construction compounds, 1.8ha for switchgear system, 0.90ha for cable sealing end. Permanent loss: 2.70ha of BMV land. The proposed development is expected to result in the permanent loss of 19.65 hectares of BMV land. There is also the potential for land to be permanently lost to habitat and mitigation. Although the loss of BMV land for solar panels is deemed 'temporary,' 40 years is a substantial duration. Additionally, the entire area is productive farmland. This represents a significant reduction in agricultural output (395ha, including 191ha of BMV land) for an extended period, leading to considerable economic and other losses. There is also a concern that the soil may not fully recover from the impacts of construction, operation, and decommissioning.	**ES Chapter 14 Soils and Agricultural Land (APP-065)** sets out how the Applicant has sought to avoid and reduce the amount of BMV agricultural land used for hard infrastructure associated with the Proposed Development, and **Appendix 14.4 Outline Soil Management Plan 2024 (oSMP) (APP-176)** details the measures to mitigate impacts to the soil. Preparation of detailed Soil Management Plans (SMPs) as part of the detailed design phase is secured via Requirement in the **Draft DCO (AS-008)**, implementing best practice guidance on soil handling. The detailed Soil Management Plans will have soil specific mitigation measures to protect the soils while in storage to ensure the preservation of soil quality over the 40-year operational period. These will include restrictions on bund heights and ongoing soil storage bund surface vegetation management. The temporary and reversible nature of the majority of the Proposed Development, along with the measures within the detailed SMPs, will allow for reinstatement of the Site to agricultural production following decommissioning. There will be a temporary loss in agricultural production during the life of the project; however, the agricultural potential will be retained. The land take involved for the Proposed Development is minimal in the context of food production nationally and allows clean energy to be generated much more rapidly and at greater scale and efficiency than rooftop alternatives. In June 2020, 71% of the UK's land, or 17.3 million hectares, was used for agricultural production, according to the UK Food Security Report 2021. In comparison, operational solar farms that occupy approximately four aces of land per MW of installed capacity take up less than 0.1% of the UK's land, as stated in 'Everything Under the Sun: The Facts About Solar Energy' published by Solar Energy UK in March 2022.

		The potential impacts on agricultural land both in respect of this scheme and cumulatively with other NSIP solar projects that are consented and emerging in Lincolnshire will be raised in the LIR and written submissions.	
		Socio-economics The Council has reviewed the ES Chapter 15 Socio – Economic [APP-066] and has the following comments at this stage. Further detailed comments will be provided in the LIR and written representations as necessary. **Education, skills and supply chain** • Potential impacts here should be a receptor in the assessment, including from table 15.10. • The measures below paragraph 15.7.2 (such as prioritising local employment) are welcome and must be delivered through the application and development phases. Use of DCO requirements must be included to ensure this.	Within **ES Chapter 15 Socio–economics (APP-066),** Table 15.10 Receptor Sensitivity Summary presents different groups of residents that could be affected by the Proposed Development's activities in a range of different ways. The groups of receptors have been identified and their sensitivity determined taking into account different characteristics including skill set and education. The supply chain impact is assessed throughout the direct and indirect area of influence on the different receptor groups identified. Impacts shouldn't be considered as receptors, in line with the presented methodology. The measures at paragraph 15.7.2 are set out in **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)**, a full version of which is secured by a requirement in Schedule 2 of the **Draft DCO (AS-008)**. Table 15.10 of **ES Chapter 15 Socio-economics (APP-066)** includes receptors susceptible to the education, skills and supply chain enhancement measures. The receptors are: local workforce: Boston and North Kesteven; local businesses and economy: Boston and North Kesteven, and; Boston Borough and North Kesteven residents. The assessment concluded that Boston Borough workforce, business and residents will experience a moderate beneficial impact from jobs and Gross Value Added ('GVA') during construction after the introduction of the education, skills and supply chain enhancement measures described in **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)**.
		Recreation, tourism and visitor economy Paragraph 15.5.46 states that 'Touring caravan and camping sites have not been considered as this is not considered to be appropriate accommodation for workers'. However, these sites should be considered in relation to tourism and the benefit that such sites can have for the local economy and the potential impact on them by the proposed development. Such sites must be considered in the EIA. The statement that 'Touristic attractions rarely attract visitors from outside of the region' (paragraph 15.9.3) seems to introduce entirely new information that is not assessed anywhere in the chapter. Which tourist attractions? How is the region defined? 15.9.3 also states that 'the visitor economy is not a significant contributor to GVA in the study area'. This too appears to be new information and at odds with paragraph 15.5.37 which quite objectively seems to show the significance of the visitor economy to North Kesteven: for 2023, 2.9million visitors, £201million and 2,000 jobs. The Council's Energy Infrastructure Position Statement asserts that Lincolnshire's landscape and open skies are recognised as significant economic drivers, supporting the visitor economy and the role of the RAF in the County—these must be protected for future generations to enjoy and use. • The Western portion of the development is on the edge of The Southern Lincolnshire Edge National Character Area (NCA 47), known for its dramatic limestone cliff and open landscape with far-reaching views. • The Eastern portion lies within The Fens National Character Area (NCA 46), historically a vast wetland with large-scale, open vistas and expansive skies, creating a unique sense of place, tranquillity, and inspiration.	Paragraph 15.5.46 of **Chapter 15 Socio-economics (APP-066)** relates directly to the analysis of accommodation capacity for workers, and is not an assessment of impact on tourism. Caravan sites that have chalet accommodation have been considered within both Table 15.7 and 15.8 as these are considered appropriate for workers and have a fixed number of available bed spaces. A number of these sites also include camping and caravan pitches; however, there is limited up to date information on the number of camping and caravan pitches and the total bed spaces available within the study area. As this accommodation type is unsuitable for workers it has be excluded from Table 15.8, as it is unlikely that influx from construction workers will have any effects on the availability of camping and caravan pitches. Whilst it is understood that these sites are important for tourism, general tourism and recreational impacts have been considered in Section 15.6 under the 'Reduction of tourist/recreational attraction' heading. This section outlines that whilst there will be an increased accommodation demand, there is existing capacity within the study area to support the influx of workers without impacting camping and caravan sites. The largest accommodation demands will also be outside of the peak holiday season. Paragraph 15.6.50 concludes that the Proposed Development is unlikely to have a measurable change on tourist baseline conditions; it will be very short term, localised and affecting a limited number of receptors, resulting in minor adverse effects. Furthermore, **ES Chapter 6 Landscape and Visual (APP-057)**, **ES Chapter 10 Noise and Vibration (APP-061)** and **ES Chapter 16 Air Quality (APP-067)** do not identify any camping or caravan sites as sensitive receptors or identify any potential effects on these sites.

			Tourist attractions are defined in baseline paragraphs 15.5.39 – 15.5.41 of **ES Chapter 15 Socio-economics (APP-066)**. The region is considered as Lincolnshire. Paragraphs 15.5.11-15.5.22 of the same Chapter analyses main contributors to GVA and jobs in the study area. Tourism is not among the biggest contributors to GVA or jobs – this is what was meant by "not a significant contributor to GVA in the study area". The Proposed Development will not significantly affect the Southern Lincolnshire Edge National Character Area and the Fens National Character Area. Visual and landscape impacts are assessed separately in **ES Chapter 6 Landscape and Visual (APP-057)**.
		Temporary workforce The impacts of a temporary workforce should be a receptor in table 15.10. Paragraph 15.6.43 states up to 303 workers will require accommodation. It is not entirely clear how many workers will commute. The chapter focuses on shops, hospitality and accommodation itself. It seems to ignore the potential negative socio-economic effects that could arise: • Demographic changes and potentially community cohesion, which could be significant depending on workforce age, gender and location of temporary accommodation. • Impact on local housing markets, including availability and affordability, particularly if the workforce is located within nearby smaller settlements. • Social services and infrastructure, an obvious area for consideration is healthcare but perhaps education and other services, again, depending on age, gender and location of temporary accommodation. • Public health and safety, depending on age, gender and location of temporary accommodation, with potential for anti-social behaviour. The above factors should be explored throughout chapter 15 and in the Environmental Impact Assessment. The cursory assumption (at paragraph 15.8.5 and table 15.18) that Springwell, Temple Oaks and Meridian will require half of workers in accommodation should be revisited. If Beacon Fen has 70%, why would these other schemes have significantly less? While the mitigation for direct impacts on accommodation (at paragraph 15.8.9) are welcome, this ignores other socio-economic impacts.	Boston Borough and North Kesteven workforce are already included as receptors in Table 15.10 of **ES Chapter 15 Socio-economics (APP-066).** At this stage, it is difficult to predict how many workers will be from outside of the local area (the assumption is 70%, see Table 15.12 – leakage factor), but implementation of **Appendix 15.3: Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)** will increase the number of people employed locally, therefore reducing the number of external workers requiring accommodation and using local services. Using the assumption of 70% is a worst-case scenario, therefore a conservative approach. Adverse effects on services such as education, healthcare and housing market has been scoped out of the assessment (see **Appendix 1.1 Scoping Report (APP-071**) and **Appendix 1.2 Scoping Opinion (APP-072**)), due to the following reasons: • temporary character of worker influx (construction stage); • assumption that workers will not bring their families to the area, therefore not impacting education; • assumption that with a successful implementation of the Outline Skills, Supply Chain and Education Plan will increase the number of local workers and not increase baseline saturation of services. To monitor and manage any unexpected adverse impacts from worker influx, the following mitigation measures have been designed and will be applied (secured through **Appendix 15.3: Outline Skills, Supply Chain and Employment Plan (APP-179)** via Requirement 17 in Schedule 2 of the **Draft DCO (AS-008)**)**:** • Community perception will be gathered through the Community Liaison Officer related to the impact of worker influx; • Updating the Code of Conduct for workers to encourage workers to limit use of services to Sleaford, where there is more capacity to accommodate additional customers; • Monitoring of local accommodation capacity will be carried out during peak construction months; and • A formal complaints procedure will be developed as part of the Community Engagement Plan, ensuring complaints are received, recorded, and responded to in a timely manner under the supervision of the Community Liaison Officer. Within **ES Chapter 15 Socio-economics (APP-066),** the assumption in paragraph 15.8.5 and Table 15.18 of 50% of workers requiring accommodation was used to

			be consistent with the Heckington Fen cumulative study and was used as the most likely scenario for Springwell, Temple Oaks and Meridian. The detailed socio-economic baseline study showed that for Beacon Fen Energy Park, the leakage factor would be 70% (explanation for that number is provided in Table 15.2). Leakage factor suggests that 70% of jobs will be taken by people outside of the Direct Area of Influence, therefore requiring accommodation,
		Socio-economics - Cumulative Effects The high volume of NSIP proposals in Lincolnshire has the potential to affect a significant area of Lincolnshire's rural landscape. The cumulative impact of successful proposals could change the rural character of the county. The effects of this potentially significant industrialisation and its local environmental, landscape, historic, and community impacts, must be carefully assessed. The impact on the county's perception by visitors and tourists as well as residents and businesses need to be assessed and reported on in this ES.	The impact on the "sense of place" and tourist and resident perception was not scoped in and was not raised in **Appendix 1.2 Scoping Opinion (APP-072**). It was scoped out primarily due to limited cumulative visual impacts, which usually largely impact the rural character of the area; **ES Chapter 6 Landscape and Visual (APP-057**) is not predicting any significant cumulative visual effects. Furthermore, cycle routes and PRoWs will not be affected in a significant way by the Proposed Development, keeping the rural character of the area unaffected. Finally, impact on tourism was also considered in the **ES Chapter 15 Socio-economics (APP-066),** and the Proposed Development will affect only a limited number of social receptors and will be localised, not affecting the touristic attractiveness of the rural character of the county. Due to the limited individual impacts of the Proposed Development on the rural character of the county, cumulative effect was scoped out.
		Fire Safety Lincolnshire Fire and Rescue (LFR) have reviewed the application and have provided the following comments. In order to be successful in firefighting, adequate access to buildings for fire appliances and immediate access to adequate supplies of water, must be provided. The access to, and proximity of, those water supplies directly affects the resources that Fire and Rescue Authorities need to provide in protecting and mitigating their communities from the effects of fire. Appendix A provides a list of LFR requirements relating to access for fire appliances and firefighting water supplies and requirements for Battery Energy Storage System (BESS). LFR note the inclusion of Protective provisions in the draft DCO [APP-036] for the protection of Lincolnshire Fire & Rescue Service which are welcomed. LFR service wish to continue to be engaged, and their views sought during the examination and through the SOCG.	The Applicant has responded to the specific points from LCC's Appendix A below, on the following pages of this document. This reproduces (for convenience) the Applicant's response to the same points which were raised within LFR's Section 42 response, and which is included at page 280 Appendix 7.7 of the **Consultation Report (AS-018)** and within the **Outline Battery Safety Management Plan (APP-279).**
		Cumulative Effects Lincolnshire is currently experiencing an unprecedented influx of NSIP proposals, with many either recently granted consent or advancing through examination or pre-application stages. This includes 13 large-scale solar development proposals, 5 of which have recently received consent. The Council is particularly concerned about the cumulative impacts of these developments, especially regarding the effects on BMV land, landscape character at local, regional, and national levels, the highway network, waste generation, and amenity-related impacts from overlapping construction periods. The Council will make further comments on the applicant's assessment of cumulative effects and on the potential cumulative impact of the development with other developments including NSIP proposals in the LIR and in written representations and update as necessary as further information on other projects comes forward throughout the examination.	In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations (2017), consideration of potential cumulative impacts associated with the Proposed Development has been undertaken. Consideration of potential cumulative impacts is considered within the technical chapters (i.e. 6 to 16) of the ES and summarised within **ES Chapter 18 Cumulative Effects (APP-069).** This includes BMV, landscape character, access and transport and amenity-related impacts. **Appendix 17.2 Waste and Recycling Strategy (APP-189)** considers cumulative arisings from all solar NSIPs at paragraphs 4.1.5 – 4.1.16 and concludes that these will be negligible due to the measures (as set out in the Strategy) which will be in place; the limited potential for waste during operation; and limited overlap in activities during construction and decommissioning.

		Other Matters The County Council will also comment on other matters relating to built heritage, public rights of way, public health, climate change and decommissioning, as necessary in the LIR and written representations following detailed review of the submission documents. In light of the unprecedented number of DCO projects that are currently on-going in Lincolnshire which may result in other examinations taking place in the County at the same time, for example Springwell and One Earth Solar schemes. Fosse Green Solar DCO application is also expected to be submitted during summer 2025. The Council wishes to be fully involved in all these examinations but has only limited resources and personnel and therefore requests that careful and sensitive attention is given to examination timetables to ensure that hearings and deadline dates consider those of other projects that will be under examination during 2025.	The Applicant notes the request for appropriately timed hearings and deadlines. This would be a matter primarily for the Examining Authority. The Applicant will have regard to this in its engagement with LCC.
		Draft Development Consent Order At this stage the Council wishes to reserve its position on the relevant parts of the draft DCO including the proposed requirements which are likely to be needed, to be amended or added to as the examination progresses. The Council will review the draft DCO to ensure that the Council's role is sufficiently recognised as a discharging authority in relation to relevant requirements and that the Council's role as Highway Authority is appropriately referenced within the draft DCO in relation to any proposed highway works or traffic regulation measures. The Council wishes to participate in any Issue Specific Hearing in relation to the drafting of the DCO.	The Applicant has noted this response.
RR-002	Lincolnshire County Council	**Appendix A – LFR Requirements** **ACCESS** 1. Access to buildings for fire appliances and fire fighters must meet with the requirements specified in Building Regulations 2010 Part B5. For small buildings (up to 2000m², with a top occupied storey that is a maximum of 11m above ground level), vehicle access for a pump appliance should be provided to whichever is the less onerous of the following: a. 15% of the perimeter. b. Within 45m of every point of the footprint of the building For all other buildings, provide vehicle access in accordance with Table 15.1 of Approved Document. These requirements may be satisfied with other equivalent standards relating to access for firefighting. Lincolnshire Fire and Rescue requires a minimum carrying capacity for hard standing for pumping appliances of 18 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 part B5. 2. If it is not possible to provide access to the proposed development in accordance with the guidance details within Part B5 of Approved Document B, as compensation, Lincolnshire Fire and Rescue may accept the provision, at the developer's expense, of an automatic sprinkler system, designed, fitted and maintained in accordance with the relevant sections of BS5306/BSEN12845:2004. Should this option be considered, our Fire Safety advisers must be provided with detailed plans of the proposed sprinkler installation. Any scheme proposed should not be of a	The Applicant has previously received this position statement from LFR and has responded to it within Table 3.1 of the **Outline Battery Safety Management Plan (APP-279)**.

		lesser standard than any provision as may be required by the Building Regulations.	
		WATER SUPPLIES 3. A building requires additional fire hydrants if both of the following apply. a. It has a compartment with an area more than 280m2. b. It is being erected more than 100m from an existing fire hydrant. If additional hydrants are required, these should be provided in accordance with the following: a. For buildings provided with fire mains – within 90m of dry fire main inlets. b. For buildings not provided with fire mains – hydrants should be both of the following: i. Within 90m of an entrance to the building. ii. A maximum of 90m apart. **All fire hydrants should conform to BS750-2012 Each fire hydrant should be clearly indicated by a plate, fixed nearby in a conspicuous position, in accordance with BS 3251. Guidance on aspects of provision and siting of private fire hydrants is given in BS 9990.* *Fire hydrant acceptance testing will be carried out by a Hydrant Inspector on completion and a standard hydrant marker "H" plate will be fi ed nearby. Following adoption the Fire Service will be responsible for the ongoing maintenance and repairs for the lifetime of the fire hydrant.* 4. Where at the time, it is not possible to determine the number of fire hydrants required for firefighting purposes, the requirement should be determined at the water planning stage when site plans have been submitted by the water companies. 5. Where no piped water supply is available, or there is insufficient pressure and flow in the water main, or an alternative arrangement is proposed, the alternative source of supply should be provided in accordance with the following recommendations a. a charged static water tank of at least 45,000 litres capacity; or b. a spring, river, canal or pond capable of providing or storing at least 45,000 litres of water at all times of the year, to which access, space and a hard standing are available for a pumping appliance; or c. any other means of providing a water supply for firefighting operations considered appropriate by the fire and rescue authority.	As set out in the **Outline Battery Safety Management Plan (APP-279)**, there is no piped water supply to the Proposed Development. The Applicant is therefore committing to provide 240,000 litres of water, currently envisaged to be split between up to 4 x 60,000 litre containers. Each of these will provide well in excess of the required 45,000-litre capacity. Furthermore, there is a small reservoir within the Site located approximately 540m south of the BESS area with a storage capacity of approximately 27,276,000 litres. While there is no permanent pump to this source proposed, it may be deemed suitable by LFR during an emergency to use their own mobile high-volume pumps.
		ENVIRONMENTAL 6. Bulk storage of highly flammable/explosive/water reactive/toxic substances and any site whereas large scale recycling activities are proposed will need to be specifically consulted with Fire Authority to ensure that the full operational impact, should a fire occur, is assessed and that an adequate provision is recommended. 7. There are a number of methods available, through which the fire water runoff problem can be addressed, the most obvious being to use a fire suppression system to contain a fire, thus not requiring large volumes of water and containment measures, such as bund walls or drainage systems	An inbuilt gaseous or liquid suppression system may be part of the selected technology for the BESS. Should this option be taken forward, detailed plans will be submitted as part of the detailed Battery Safety Management Plan (BSMP) which is secured by Requirement in the **Draft DCO (AS-008).** As set out in the **Outline Battery Safety Management Plan (APP-279)**, in the unlikely event of a fire within the BESS area, fire water can be contained within a lined lagoon at the centre of the BESS platform if necessary, e.g. in the further unlikely event that water is deployed directly onto the fire (as opposed to the more likely scenario of being used solely for the cooling of adjacent units), or heavy rainfall coinciding. Shutoff valves could be used by fire crews to contain and reuse

		with lagoons, interceptors, reed beds or treatment plants. It is not for the fire service to stipulate which approach to take, simply to ensure that suitable measures are made a condition of planning approval through a firefighting water run-off strategy.	water or to prevent potentially contaminated water from being discharged to the watercourse. After the fire has been managed, such contained firewater will be tested and either released to the watercourse or removed from the Site for treatment and off-site disposal.
		BESS Requirements A LFR recognises the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry the Service would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks. LFR will work and engage with the developer as the project evolves, to ensure it complies with the statutory responsibilities that we enforce. The developer should produce a risk reduction strategy (Regulation 38 of the Building Regulations) as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. We would also expect that safety measures and risk mitigation is developed in collaboration with LFR. The strategy should cover the construction, operational and decommissioning phases of the project. During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service will want to view the transport strategy to minimise this impact and prevent an increase in the number of potential road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area. LFR works within the guidance of the National Fire Chief's Council (NFCC) who have been working with several government departments to ensure that fire and rescue services are made aware of any new proposals. NFCC have created a guidance document (link below) that constitutes LFR's requirements for new BESS development proposals. LFR are aware that large scale BESS is a fairly new technology, and as such risks may or may not be captured in current guidance in pursuance of the Building Regulations (as amended) and the Regulatory Reform (Fire Safety) Order 2005. This will highlight challenges the FRS have when responding to Building Regulations consultations. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems. Failure to comply with the above requirements at planning stage can seriously compromise firefighting operations resulting in unnecessary risk to life, loss of property and unnecessary damage to the environment. Recognising that LFR are statutory consultees as a result of the Planning Act 2008 and applications that involve 'National Significant Infrastructure Projects' (NSIPs), we will work and engage with the developer as the project evolves, to ensure it complies with the statutory responsibilities that we enforce. LFR works within the guidance of the National Fire Chief's Council (NFCC) who have been working with several government departments to ensure that fire and rescue services are made aware of any new proposals.	The **Outline Battery Safety Management Plan (APP-279)** sets out how the Applicant proposes to ensure risk reduction is central to the detailed design and subsequent construction, operation, and decommissioning of the BESS element of the Proposed Development. The adopted risk reduction measures will be captured within the detailed BSMP, submitted pursuant to a requirement in the **Draft DCO (AS-008)**, and will reflect the prevailing legislation, guidance and standards at the time of its production. Further, in accordance with NFCC guidance, a RMP and ERP will form appendices to the detailed BSMP. The relevant planning authority must consult LFR when determining the application to discharge Requirement 6 in Schedule 2 to the **Draft DCO (AS-008)**.

RR-011	Network Rail Infrastructure Limited	The Promoter [Beacon Fen Energy Park] seeks authority and powers in the draft Order to permanently acquire rights over land in the ownership of Network Rail, as summarised below: 1. Freehold owner - Permanent acquisition of new rights over 3682.45 square metres of railway line (Grantham to Skegness Line); south east of Great Hale Drove, Sleaford, Unregistered Land, (Plot 10-14). Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme. As the Promoter proposes to compulsorily acquire new rights over railway land including operational track as well in close proximity to railway assets, Network Rail hereby objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking. In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation) and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway. Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order.	The Applicant has included a proposed form of protective provisions within the **Draft DCO (AS-008)**, which seeks to provide protections to ensure no serious detriment to Network Rail's statutory undertaking. The Applicant is continuing to engage with Network Rail regarding the drafting of these protective provisions and acknowledges the form of provisions appended to Network Rail's Relevant Representation. The Applicant anticipates that, through ongoing engagement, the majority of points of difference between the Applicant's current form of Network Rail protective provisions on the face of the **Draft DCO (AS-008)** and Network Rail's preferred wording, will be capable of resolution and agreement. However, the Applicant notes that Network Rail's preferred form of protective provisions include wording which would require the Applicant to secure Network Rail's consent before exercising certain DCO powers which might affect Network Rail's undertaking. This includes the use of compulsory acquisition powers. The effect of this drafting would be that the Applicant would not be able to acquire the interests it needs to implement the Proposed Development without first seeking Network Rail's consent. The Applicant is seeking to negotiate voluntary agreement for the grant of the interests in the land it requires from Network Rail and discussions between the parties continue in this respect. However, the parties have been unable to reach agreement to date due to the conflicting positions in respect of 'lift and shift' and 'termination' provisions sought by Network Rail. In addition, despite the Applicant offering compensation for the rights sought in the **Draft DCO (AS-008)** well in excess of that payable under the 'compensation code,' and based on directly comparable transactions, Network Rail has resisted this offer seeking greater compensation. In the absence of reaching agreement, this provision has the potential to hinder the progress of the Proposed Development, because it would fetter the exercise of the Applicant's rights and powers under the DCO and would compromise the Applicant's ability to secure the necessary rights over land required for construction and operation of this critical national priority infrastructure. Under the Applicant's current drafting of Network Rail protective provisions contained in the **Draft DCO (AS-008)**, the Applicant must secure Network Rail's approval before carrying out any 'specified work' (being so much of the authorised development as is situated upon, across, under, over or within 15 metres of, or may in any way adversely affect railway property). For this reason, Network Rail's operational undertaking would not be adversely affected by any works undertaken as part of the Proposed Development, even if rights were separately compulsorily acquired to construct and operate the Proposed Development on Network Rail's land. The Applicant is not seeking powers to acquire a freehold interest in Network Rail's land for this Proposed Development. Therefore, Network Rail's further approval to exercise powers of the DCO would unnecessarily restrict the Applicant's ability to deliver the Proposed Development. There is precedent for the Applicant's approach in a number of energy DCOs, including most recently The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and The National Grid (Bramford to Twinstead Reinforcement) Order 2024, where the Secretary of State agreed with the promoter of those DCOs that consent for the use of compulsory acquisition powers was not required in order to satisfy the test in section 127 of the Planning Act (2008). The equivalent issues relating to 'lift and shift' and 'termination' provisions were in dispute between the promoters of these precedent DCOs and Network Rail. In addition, the decision letter granting development consent for The Associated British Ports (Immingham Green Energy Terminal) Order 2025

			specifically noted that: "*it would not be suitable to relocate or move the pipeline once it has been installed and is operational*", and so the Secretary of State in that case was "*satisfied that with the protective provisions included in the [Immingham] Order*", which included the same compulsory acquisition drafting as the Applicant proposes. Accordingly, the Secretary of State's determination in favour of the promoter in these DCOs is a direct precedent for the Applicant's position. Therefore, whilst the Applicant will continue to engage with Network Rail seeking to agree both the form of protective provisions and voluntary land agreement, it cannot agree to include wording within the **Draft DCO (AS-008)** which would require Network Rail's consent for any exercise of compulsory acquisition powers.
AS-023	Ewerby & Evedon Parish Council	Ewerby and Evendon Parish council ("the Council") has met and discussed the proposed Beacon Fen Energy Park at Ewerby Thorpe (the "Development") on several occasions during Council meetings over the past two years. **The Council is strongly against the proposed development and request that the Examining Authority's recommendation to the Secretary of State is that the project should not be given permission to go ahead.** The principle reasons for the Councils objections are summarised below in two categories; local issues; and macro issues. **1. Local Issues** 1.1. **Scale** – the parish is 1,973 ha of open countryside. The Development's solar arrays alone amount to 529 ha (1,307 acres) which is 27% of the entire parish. The scale and loss of the countryside is an enormous wholescale transformation of the parish's landscape. The Council would support a smaller scale development, up to 132 ha (325 acres), in the south eastern quarter of the proposed site away from highways, footpaths and residential properties. 1.2. **Location** – it is given that transforming countryside from open farmland to industrial energy use is a detrimental transition for the locality. Such sites therefore should be chosen where their impact is minimised, such as shielding by woodland or the topography of the land (behind a hill). For example the nearby 160 acre solar park at Ermine Street Farm, Cranwell, Sleaford is a good example of a considerate location. The Development however is proposed on a location that actually presents the exact opposite. From the village of Ewerby Thorpe which is on a rise of 20m above sea level the entire site corner to corner can be seen spread out below the village at its elevation of 2m-7m. Further, from the public highways along the northern and western boundaries the entire site can be viewed, as it can be from the village and houses of Ewerby Thorpe, Howell and Howell Fen. Even if screening above the proposed 4.5m arrays could be achieved from the outset the hedges will be without leaf for over six months of the year. This leaves the landscape for the residents of the parish a new unwelcome industrial scar. 1.3. **Wellbeing** – Already there has been significant anguish and anxiety within the parish. The Council has been approached by multiple households to ask for help with regards to the project. The effect on the local residents has been very sad to witness, and of course the Council is powerless to help since the project is an NSIP. Sleepless nights, tears and	The Applicant first contacted Ewerby and Evedon Parish Council to offer an in-person briefing in April 2023, ahead of the early (non-statutory) consultation phase which took place May-June 2023. Subsequently, the Applicant gave a briefing to the Parish Council on 10 May 2023. A further briefing was given to the Parish Council on 8 February 2024 during the statutory consultation phase. An in-person consultation event was also held in the village during statutory consultation. Open lines of communication have been maintained with the Parish Council throughout the pre-application stage and they have been kept informed of project updates and announcements via email throughout. The design and layout of the Solar Array Area was refined following feedback received during statutory consultation. Mitigation measures were developed including the reduction in extent of solar PV to provide buffers to nearby residential receptors; minimising vegetation loss within the Site through retention of the existing field pattern; and introducing native shrub and hedgerow planting within the Site to provide strategic visual mitigation, alongside landscape and biodiversity enhancements. Specifically in relation to Ewerby Thorpe, strategic planting is proposed to screen views of the onsite substation and BESS; linear planting to break up views of solar PV; and retention and enhancement of existing vegetation on the Site boundaries to screen views. The Applicant also undertook direct consultation with immediate neighbours of the Site to discuss appropriate mitigation and views from their properties. Changes were subsequently made to the scheme layout, including amendments to the extent and shape of buffers to properties; and the relocation of planting to the far edge of buffers in order to retain an area of openness adjacent to the property. The land take involved for the Proposed Development is minimal in the context of food production nationally and allows clean energy to be generated much more rapidly and at greater scale and efficiency than rooftop alternatives. In June 2020, 71% of the UK's land, or 17.3 million hectares, was used for agricultural production, according to the UK Food Security Report 2021. In comparison, operational solar farms that occupy approximately four aces of land per MW of installed capacity take up less than 0.1% of the UK's land, as stated in 'Everything Under the Sun: The Facts About Solar Energy' published by Solar Energy UK in March 2022. Following the end of the operational period, the land used for solar would be returned to agricultural use. The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield or lower grade agricultural land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park. For properties outside of the Order Limits, rights to statutory compensation are provided for through the application of Section 10 of the Compulsory Purchase Act

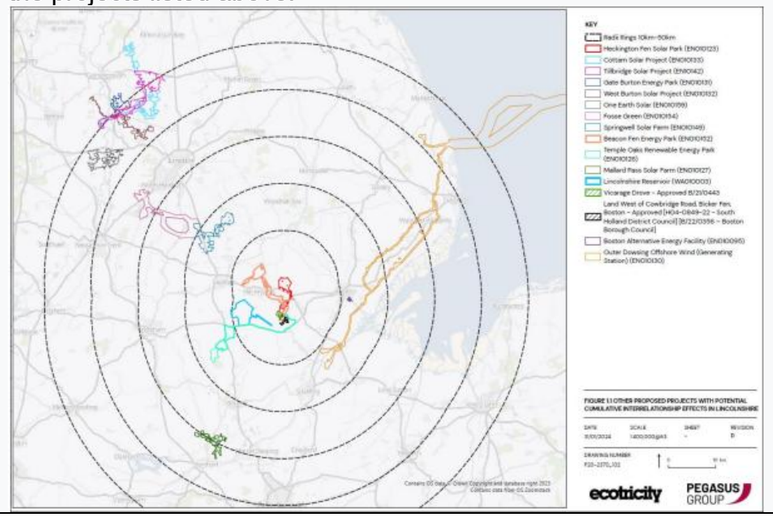
		anxiety are described to the Council and witnessed by the councillors. This trauma and upset is very real and happening. 1.4. **Entrapment** – one local resident had a sale agreed on their property, subject to contract, when the Development was announced in the spring of 2023. Their buyer pulled out of the sale due to the Development and the residents have not been able to sell their house since. They are trapped and their life plans are on hold. Others have subsequentially tried to sell their properties but all, without exception, have been unsuccessful. The Chairman of the Council has had a property in Ewerby Thorpe valued for probate reasons and the valuation was impaired by 32% due to the proposed Development. With such large reductions in property values, even if a buyer could be found for these lower prices, those who wish to move away from the Development cannot, and may even find themselves in negative equity if a sale can be agreed. These are real tangible issues that are unfairly affecting the local residents around the Development with no compensation nor thought from the developers. The Council understands that there is no legislative obligation on the developer to address these problems but the Council would like the Examining Authority to stress these issues to Secretary of State as they make their decision. The local population is already being unfairly harmed by the proposed Development with no recourse. 1.5. **Disruption** – if the project proceeds the parish will be subject to significant traffic disruption. It is noted that there is a planned access route, forcing an easement on the local farmers, but such routes and instructions to use this route will inevitably be flouted. The experience of the Sleaford power station and traffic issues that are endured by our neighbouring village have been presented to the Council by the leader of Kirkby-La-Thorpe parish council. It is understood that there will be a workforce of circa 400 personnel for the construction of the project for four years. There is no explanation of how these workers and the deliveries will be forced to use the bespoke access route and how that will be enforced. It is expected that this work will fall on the residents affected by the project, as was the case for the Sleaford power station. This is an unwelcome burden. 1.6. **Landscape** – this project is just one of a goldrush in the area that is making a wholescale change in the landscape that we live in. The concentration of solar farms in the area is overwhelming. Specifically: ▪ Heckington Fen 1,600 acre approved in July 2024 which is only 2 miles away; ▪ Burton Pedwardine 210 acres of solar 2.5 miles; ▪ Moore Lane Farm 25 acres of solar 3.5 miles; ▪ Bell house Farm 150 acres 4 miles; ▪ Gorse Lane Solar Farm 180 acres 4.5 miles; ▪ White House Farm 250 acres, 4.5 miles; ▪ Vicarage Drove solar farm 250 acres 5 miles; ▪ Sun Energy solar Farm 250 acres 5 miles; ▪ Ermine Street Farm 160 acres of solar 7 miles away; ▪ Grange Farm solar park 40 acres, 9 miles; ▪ Dances Bank solar park 57 acres, 9 miles; ▪ Folly Lane Farm 20 acres, 11 miles;	1965, Part 1 of the Land Compensation Act 1973, and Section 152(3) of the Planning Act (2008). Compensation is payable where loss or damages are suffered due to construction, or where there is a loss in property value due to physical factors (such as noise, dust or light pollution) arising from the operation of the Proposed Development. Those parties the Applicant has identified as potentially being able to make a claim are identified as Category 3 interests in Part 2 of the **Book of Reference (PDA-002)**. However, a party is not precluded from making a claim under the provisions set out above if they have not been included in the Book of Reference. Whilst the Proposed Development will remove the Solar Array Site area from food production for the life of the development, the removal will be temporary and the land will be returned to its current use upon decommissioning. During the operational life of the Proposed Development, the possibility of co-utilising the site for grazing (thereby allowing some agricultural use) is being investigated and the viability of this will be determined at a later stage. It should also be noted that the cessation of intensive farm management at the Site for the duration of the life of the Proposed Development will result in beneficial impacts upon the soil resource present. In relation to the movements of construction workers, this will be controlled via the detailed Construction Traffic Management Plan (CTMP), which is secured via Requirement 13 in Schedule 2 of the **Draft DCO (AS-008).** An **Outline CTMP (APP-159)** was included with the Application submission, which details the measures proposed to protect the amenity of neighbouring properties, ensure that construction traffic impacts on the local highway network are minimised, and maintain safety for all road users. All contractor and delivery traffic will be required to follow the specified construction traffic routes. The Outline CTMP also includes an Outline Staff Travel Plan, which details measures to minimise the impact of construction staff travel, such as minibus transport and car sharing. In relation to cumulative landscape effects, **ES Chapter 6 Landscape and Visual (APP-057)** and **ES Chapter 18 Cumulative Effects (APP-069)** provide an assessment of cumulative landscape and visual effects at construction, operation, and decommissioning within the 5km LVIA study area. It has been found that there will be no significant cumulative landscape or visual effects. At a national and county level the introduction of further development will result in an increased characterising presence of energy infrastructure. This will result in adverse cumulative landscape effects for the national landscape character area. However, the contribution of the Proposed Development to this overall cumulative scenario would be limited and not significant because of the separation distance and limited intervisibility between the Proposed Development and other relevant schemes. In relation to job loss and creation, as set out within **ES Chapter 15 Socio-economics (APP-066)**, the Proposed Development will result in the displacement of 1.3 full time jobs related to the change of use from agriculture. However, the Proposed Development will require 556 full time jobs for the 24-36 months of construction. In addition to the direct employment generated by the construction of the Proposed Development, there will be an increase in indirect local employment. Indirect employment will likely come from supply chain opportunities and increased spending from part of the income of the construction workers and suppliers in the area, in itself generating further employment. It is estimated that 15 full time net direct and indirect jobs will be created during the operational phase. **Appendix 15.3 Outline Skills, Supply Chain and**

		▪ Ing Bank solar 50 acres 14 miles; Our area has endured far in excess of its fair share of these projects already. See Appendix 1 for a list of addition known projects in our locality that are in planning, the above are all operational or under construction. 1.7. **Local jobs** – the agronomist for the land will lose his work; the blacksmith in Heckington that supports the farm will lose his customer; the agrichemical business that supports the land will lose their trade; the local machinery dealer will lose a client; the fertiliser manufacturer and salesman will lose his book and all the local allied trades that support the farmland will lose out. Then the secondary effect of this loss of trade will be felt by all the other trades and services that in turn supply these primary contacts of the farmland. This is replaced by a remote, internationally funded, business with no investment in the local economy. **2. Macro issues** 2.1. **Spatial energy plan** – the government is yet to produce a Spatial Energy Plan detailing where the electricity is needed, where it is produced or should be produced and how the production and consumption are connected. Political ambition is driving decisions rather than carefully considered planning of generation and consumption requirements. Decisions such as these should only be made once the Spatial Energy Plan has been completed. Lincolnshire has excess supply of electricity compared to demand, specifically the supply making landfall from the north sea and being transferred from Scotland, therefore no more power generation is required in the locality of this proposed project, meaning it will need to be transferred away. 2.2. **Energy production** – solar PV generates most of its output during the summer months, peaking at midday on sunny days. Relatively little generation happens in the winter. Peak solar tends to correlate with the periods when demand as at its least. This is evident from established market signals where power is sold in half hour segments. Currently the 'capture' price for solar is approximately 16% below the market price. This means the market values it less than other forms of generation because it is available when there is least demand. The UK currently has approximately 17GW of solar installed and the National Energy System Operator (Neso) has opined that the country needs 47GW by 2030. Tripling supply will crash 'solar capture' prices. The developers will require long-term contracts via Contract for Difference (CFD) auctions run by Nesco. These guarantee an index linked price but are paid for by everyone's energy bills. These bills will inevitably rise as solar is likely to be exporting mostly when market prices are below CFD rates. 2.3. **Balance of payments** – following on from this, the assumption is that Low Carbon will sell the site if planning is granted. Initially they informed the Council that they had funding for the Development from a Canadian pension fund. They have sold the Gate Burton development just north of this site to the French energy firm EDF. In either scenario the British energy bill payer will be paying excess energy bills to offshore businesses thus damaging the country's balance of payments.	**Employment Plan (OSSCEP) (APP-179)** enhances beneficial impacts from employment creation, aims at reducing influx of workers and mitigates impacts related to loss of employment. This plan is proposed to include such measures as: • Prioritising local employment; • Reskilling of temporary farm workers to avoid economic displacement or support in finding alternative agricultural work; • Reskilling of workers after operational phase; and • Potential upskilling of local residents through apprenticeships. The OSSCEP is secured via Requirement 17 in Schedule 2 of the **Draft DCO (AS-008)**. In respect of the "Macro Issues" raised, the Applicant considers these points relate to the Government's policy, rather than specifically to the Proposed Development. It is not the role of this Examination to test such matters, which is instead on how, and whether, the Proposed Development complies with such policy. This general position notwithstanding, the Applicant has made certain limited comments below to offer clarification where considered helpful. The Government has asked the National Energy System Operator to produce the first strategic spatial plan for energy, intended to help cut grid connection waiting times, giving investors confidence on where to build and when. The first iteration will be published in 2026. However, Government policy is clear on the urgent need for new energy infrastructure, including solar generating stations, set out in EN-1 and EN-3. EN-1 explicitly states that there is a critical national priority for low carbon energy infrastructure (paragraph 4.2.4). The relevant policy related to need and how the Proposed Development contributes to that need is covered in detail within the **Planning Statement (APP-277).** As part of the Government's Energy Security Strategy (which is also covered in detail within the **Planning Statement (APP-277)**, published April 2022, and advice from the Climate Change Committee (CCC) – an independent statutory body advising the Government on emission targets and reporting on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change - the UK needs a diverse and flexible mix of energy solutions, generating cheaper, cleaner homegrown energy. Part of this energy mix includes ground-mounted solar PV panels, with energy storage alongside. Solar PV is part of this energy mix, not only for being able to harness energy from the sun (a free resource) but also because it does not produce any harmful greenhouse gases in the process. It is also the quickest renewable energy technology to build and one of the cheapest forms of renewable power currently available to us.

2.4. **Grid capacity** – solar makes poor use of grid capacity, a solar project uses approximately 12% of its grid capacity compared with a wind farm at around 40%. Therefore the capacity available at Bicker sub station should be used by the less invasive and more efficient north sea wind generation projects.
2.5**. Land use** - Loss of arable land to solar parks and infrastructure offshores our environmental damage but extrapolates that damage due to UK's and, especially, Lincolnshire's productivity.

Country	**5 year average wheat yield (2019-2023) t/ha**	**No. Of replacement ha required for 1ha of Beacon Fen Farmland loss**
Beacon Fen Farmland	10.17	1ha
World record - Lincolnshire	17.96	0.57ha
UK	8.03	1.25ha
USA	3.45	2.9ha
Russia	3.00	3.4ha
Australia	2.28	4.5ha

2050 government land use targets a 20% reduction in arable area. General population expectations are for a 15% rise by 2050. It is 'hoped' that yield increases will compensate for this mis match and food security will not be compromised.
However wheat yields have plateaued5 and with the advent of the new environmental schemes, nitrogen taxes and regenerative agriculture it is expected that they will decline in this period reducing self-sufficiency.
In 2023 the UK was deemed to be 62% self-sufficient in food6 . Reduce arable area by 20% and raise population by 15% this will leave the UK 43% self-sufficient before the aforementioned expected reduction in productivity.
Therefore the UK will need to rely on exporting countries such as Russia and Brazil for our food and hope they are not doing a similar reduction in their agricultural capabilities. Importantly though, as noted in the above table, we will require between 3 times and 4.5 times the lost area in the UK of their farmland to compensate for our loss.
The developer does not divulge the site's agricultural yields which are in the UK's top quartile.
In the UK there are 18.2m hectares of agricultural land of which only 27%, or 4.7m hectares are capable of producing arable crops. The remaining 73% cannot grow arable crops. The Development is on land in the top quartile of arable production in the UK on its predominantly Grade 2 and 3 soils. Land based solar projects must be confined to non productive land, not farms that are capable of growing consistent yields well in excess of the UK average.
World Resource Institute (WRI) report from 2023 noted that 85% of the planet's usable land is already in commercial forestry or agriculture and

		that the world is on course to need more than 50% extra food and wood by 2050 compared to 2010. At present rates of yield increase meeting this demand would mean converting an area of natural habitat up to twice the size of India. Dedicating land already in production out of production compounds this environmentally diabolical situation. This will unwittingly accelerate global biodiversity loss and have an overall negative climate impact and drive up food imports. 2.6. **Wholescale change** – the county of Lincolnshire is experiencing an unprecedented attack on our environment with over 40,000 acres (12.5GW) of projects granted planning or with planning in the pipeline. This is creating a permanent change in the character of the environment that we live in. The appropriate place for solar development is on roof tops; car parks; brown field sites; and non arable poor agricultural land out of sight. Not, as in the case with Beacon Fen, in the wide open countryside on top quartile arable land. **Appendix 1** Solar mega projects commissioned and proposed in and around the Council. ▪ Heckington Fen 1,600 acres ▪ Fosse Green 2,400 acres ▪ Leoda Solar 2,400 acres ▪ One Earth solar 3,700 acres ▪ Springwell solar 4,200 acres ▪ Temple Oaks 1,200 acres ▪ Tillbridge solar 3,459 acres ▪ Gate Burton 1,690 acres ▪ Meridian 1,500 acres ▪ Mallard Pass 1,120 acres **Figure 1**. Extract from Heckington Fen planning application with some of the projects listed above.  	

3. Responses to representations from those with Land Interests

Table 3.1: Responses to representations from those with Land Interests

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
RR-019	David Harmston	It's perhaps a well-expressed argument that the loss of prime agricultural land is not a wise decision. The attraction of an entry point to the national grid at Bicker seems to be pulling in applications beyond what could be considered reasonable. A specific consideration for this proposed site is linked to the loss of agricultural production. Food security yes, but this is a big wheat and barley area. The waste product of that is straw. Straw production is considerable and just 6 miles away we have a green straw burning power station (Sleaford). That pulls tens of thousands of straw bales from the county, including those produced on these proposed solar site fields. The gradual eating away of farmland, here and in the rest of the area, means less food and less straw. This means the power station will have to source it further away. Longer, diesel-fuelled lorry journeys and more of them resulting in higher pollution and generation costs. Not the way to net zero.	The Affected Person has been identified as holding a Category 3 interest in the Proposed Development, as defined under Section 57(4) of the Planning Act (2008). This interest is set out in Part 2 of the **Book of Reference (PDA-002)**. The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). **ES Chapter 14 Soils and Agricultural Land (APP-065)** considers the likely significant effects of the Proposed Development on agricultural land (in terms of land lost from agricultural production) and soil resource (in terms of damage, degradation, and loss of soil resource) during the construction, operational and decommissioning phases of the Proposed Development. **Appendix 4.1 Cumulative Assessment Long List (APP-081)** and **Appendix 4.2 Cumulative Assessment Short List (APP-082)** examine the cumulative impact in terms of other projects in the local area, including food security. The Proposed Development will provide approximately 400 MW of valuable clean energy that is deliverable swiftly. This represents a substantial benefit in relation to greenhouse gas emissions (as confirmed in **ES Chapter 12 Climate Change (APP-063)**) due to the displacement of conventional forms of generation, as well as benefits to energy security and consumer costs.
RR-023	Jacqueline Anne Scott	NOT on prime agricultural land Far too big, eyesore for countryside when power is not even 24/7 or anywhere near that. So huge drainage issues. Wildlife among these enormous solar parks, very suspect. Certainly no wildflowers or bees! Must be alternatives for power - tidal, nuclear fusion? Both 24/7.	The Affected Person has been identified as holding a Category 3 interest in the Proposed Development, as defined under Section 57(4) of the Planning Act 2008. This interest is set out in Part 2 of the **Book of Reference (PDA-002)**. The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield or lower grade agricultural land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park. Whilst it is acknowledged that the site is large, this location offers an opportunity to deliver renewable energy at scale, making a significant contribution to reductions in CO_2 whilst also delivering one of the cheapest forms of energy available. A range of different energy solutions are required in order to meet the government's net zero target – including nuclear as well as solar and battery storage. The findings of **ES Chapter 11 Water Resources and Flood Risk (APP-062)** record that, with the identified mitigation measures in place, there would be no

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
			significant effects upon the water environment and flood risk off-site or on-site as a result of the Proposed Development. The Proposed Development will deliver Biodiversity Net Gain of 30% for Habitat Units, 10% for Hedgerow Units and 10% for Watercourse Units which shall be in place for 30 years as part of a wider package of appropriate landscaping and habitat proposals and new and improved hedgerows as set out in the **Biodiversity Net Gain Strategy (APP-280)**. This will be suitably managed as set out in **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** and secured by a Requirement in Schedule 2 of the **Draft DCO (AS-008)**.
RR-018	Copperhill Kennels	We are one of the two properties that are in the middle of the proposed development. Beacon Fen have visited us and kept us informed all the way through the process so far. They have assured us that our requests for a large gap between our property and the start of the panels will be met and that they will also seriously consider our other requests as a form of compensation. We hope that we can trust them and that the building of this solar panel farm will not harm the animals in our care nor harm our local wildlife as we have nesting [REDACTED], deer, hedgehogs and [REDACTED] that all live on our property.	The owners of Copperhill Kennels have been identified as holding Category 2 and 3 interests in the Proposed Development, as defined under Section 57(2) and Section 57(4) of the Planning Act 2008. These interests are set out in Parts 1 and 2 of the **Book of Reference (PDA-002)**. A virtual meeting was held with Copperhill Kennels in April 2023, ahead of early (non-statutory) consultation to introduce the project in more detail and discuss mitigation measures to reduce any adverse impacts of the project on their business and property. A further meeting was held in May 2023 in person at Copperhill Kennels to discuss options for screening measures in more detail. In September 2023, the Applicant organised for the stakeholder to visit its operational solar farm at Bury St Edmunds so they could see what a typical solar farm looks like. Outside of these meetings, the Applicant regularly updated the stakeholder about the project throughout the pre-application consultation stage. Subsequently and in response to the mitigation measures discussed at these meetings, screening has been added to the Proposed Development around the Kennels to reduce visual impact.
RR-037	Anne Berry	As a resident that will be living on the boundary of this proposal, I do not believe the impact on us is being fully considered. I am concerned about the cumulative impact that the number of proposals in my area will have on the welfare of the local residents, the loss of quality food farming land and the dangers associated with these projects. I do not believe that these sort of projects are the solution to our "energy crisis".	The Affected Person has been identified as holding a Category 3 interest in the Proposed Development, as defined under Section 57(4) of the Planning Act 2008. This interest is set out in Part 2 of the **Book of Reference (PDA-002)**. The Applicant pro-actively engaged with the stakeholder throughout the pre-application consultation stage. A meeting was requested by the stakeholder and held in May 2023, during the early (non-statutory) engagement phase. A further meeting was held in February 2024 to discuss the preferred visual screening measures at the stakeholder's property in further detail which were accommodated where possible. Open communication with the stakeholder was maintained throughout pre-application consultation, and they were sent regular updates regarding the Proposed Development. The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)).

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
			Appendix 4.1 Cumulative Assessment Long List (APP-081) identifies all the other developments reviewed as part of the EIA and **Appendix 4.2 Cumulative Assessment Short List (APP-082)** identifies those other developments within the long list that were brought forward as part of the cumulative impact assessment (within Section 18.5 of **ES Chapter 18 Cumulative Effects (APP-069)**), to examine the inter-cumulative impacts (including food security, noise and vibration, air quality and access and transport). This approach is explained within Section 4.6 of **ES Chapter 4 Scope and Methodology (APP-055)** of the ES. The Proposed Development will provide approximately 400 MW of valuable clean energy that is deliverable swiftly. This represents a significant benefit in relation to greenhouse gas emissions (as confirmed in **ES Chapter 12 Climate Change (APP-063)**) due to the displacement of conventional forms of generation, as well as benefits to energy security and consumer costs.
RR-031	James Christopher Sardeson	Relevant Representation withdrawn.	N/A
RR-020	Fidra Energy	Fidra is a UK-based battery and energy storage developer currently progressing a 1.2 GW Battery Energy Storage System (BESS) project located adjacent to the Bicker Fen Substation in Lincolnshire, under the subsidiary Bicker Drove Limited (the Fidra Project). The Fidra Project has the benefit of an electricity generation licence - 15674780. The planning application for the Fidra Project (ref: B/25/0224) (the Planning Application) has been submitted to Boston Borough Council, passed validation checks, and is due to be determined on 27 August 2025. The Fidra Project represents a substantial investment in grid stability and energy resilience, complementing renewable generation across the region. **Summary of Representation** Fidra strongly supports the wider energy transition and does not object in principle to the development of the Beacon Fen Energy Park. However, we are compelled to submit this representation to raise serious concerns about the current proposed cable routing within the DCO Application and its direct conflict with the footprint of the Fidra Project's proposed development, where we have the benefit of an option agreement dated 10 April 2024 over the entirety of the site as per the plan attached at Figure A. **Specific Concerns** **a. Routing Conflict and Site Sterilisation** • The current Order Limits include a cable corridor that dissects the middle of the Fidra Project's BESS development site. To assist the examination, we have prepared a figure of the Fidra Project's proposed development site with the proposed areas for compulsory acquisition overlayed and shown in yellow. See Figure B. The CPO area overlayed in yellow has been identified from the submitted Land Plans and Book of Reference – see Plot Number 18-11 on the Land Plans. (i) The compulsory acquisition area proposed	The Applicant has undertaken numerous rounds of review in order to identify the most suitable Cable Route for the Proposed Development. A summary of this process is set out within Table 3.2 of the **ES Chapter 3 Alternatives and Design Evolution (APP-054)** and discussed further in **Appendix 3.1 Cable Route Corridor Appraisal (APP-079).** A plan showing the Alternative Cable Corridors is included at **Figure 3.1 Alternative Cable Corridors (APP-197).** The potential to share elements of the Cable Route Corridor with Heckington Fen was considered, via Option 2 as set out in Table 3.2 in **ES Chapter 3 Alternatives and Design Evolution (APP-054)**. However, Option 2 runs close to a Scheduled Monument, which comprises a prehistoric settlement and, therefore, may extend beyond the apparent boundary. As such a buffer would be required to this asset, which could not be accommodated within the corridor for Option 2 due to its proximity to the asset. Option 2 also runs through the edge of a HER monument polygon for a Roman Saltern; close to Romano-British Farmsteads; and close to the Anglo-Saxon trading centre. As such, a Cable Route Corridor which could potentially share elements with Heckington Fen (i.e. Option 2) is considered likely to result in significant heritage and archaeological impacts when compared to Option 1, which was refined into the Cable Route Corridor following further options analysis. In respect of the interface between the Proposed Development and Fidra's project – it is acknowledged that there is an overlap between the proposed Cable Route Corridor for the Proposed Development and the red line boundary for the planning application currently awaiting determination for the Fidra Project. The extent of this overlap will be sensitive to the detailed design evolution of each scheme and subject to their respective planning consents; however, this residual uncertainty at present notwithstanding, both parties are participating in collaborative discussions about this potential interface and the Applicant anticipates that a suitable resolution can be reached and documented by the mid-point of the examination.

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		pursuant to the Application (highlighted in yellow) takes up ~ 16 of the 42 acres Fidra has under option, which is almost 40% of the BESS site. This area is greater than 100 m in width for the majority of its length. (ii) The Applicant has indicated that the temporary cable easement required during construction is ~ 30 m wide. This has been added to Figure B for context in green to demonstrate the extent of the impact this would cause if the Applicant committed to the placement of the cable 15 m from Vicarage Drove. If the Applicant committed to placing the cable in Vicarage Drove, in reliance on street works powers, or closer to Vicarage Drove, then we would expect this temporary cable easement to be narrower. (iii) The Applicant has also confirmed that the permanent easement required would be 12m wide (we assume on the basis of the cable being placed on a centre line and 6m either side of that centre line. If the Applicant committed to placing the cable in Vicarage Drove, or closer to Vicarage Drove, then we would expect this permanent easement to encroach less into the Fidra Project site. (iv) Given the narrow permanent easement required, there is no justification for the extent of powers of compulsory acquisition sought pursuant to the draft Order which cover an area of 180m width at its widest. • The total land take for the cable route if this routing were selected, would effectively sterilise the site, making the Fidra project unviable. • Whilst the Applicant's Consultation Report notes that it was aware of Fidra's land interest prior to the submission of the Application, it does not deal with the substance of the correspondence which Fidra issued to the Applicant in March 2025. • Both sides have held initial discussions, knowledge shared and understand each other's interest, however no formal agreement has been reached with Fidra nor a commitment to avoid this conflict within the DCO limits. Notwithstanding that the Planning Application has been submitted for the Fidra Project and that Fidra has the benefit of an interest in the land, the Applicant's position has been that it is premature to enter into discussions over any such agreement. **b. Alternatives Not Adequately Considered** • Previous routing options shown during statutory consultation included wider corridors and alignment synergies with the Heckington Fen Solar Farm cable route. These alternatives would entirely avoid the conflict with the Fidra BESS site. • This is important given that the Applicant recognises that there are alternative cable route options in the Application documentation and that, in spite of being raised with the Applicant prior to the submission of the Application, planning and the sterilisation of the Fidra Project has not been factored into this assessment. • Viable alternatives remain available within the DCO boundary, including: o Routeing the cable within or along Vicarage Drove. o Co-location with existing or consented infrastructure (e.g. Heckington Fen). The reasons for discounting this option are light and are not fully assessed in the Application.	

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
		c. Benefits • The Proposed Development includes a BESS facility of 600MW and the Applicant seeks to attach weight to the benefits of this BESS facility. However, this BESS facility is roughly half the size of the Fidra Project (which has a capacity of 1.2GW), would not deliver the same benefits as the Fidra Project and is not as well situated to the grid connection point as the Fidra Project. Therefore, the impact on the Fidra Project is an important consideration in this Application. This is also important given that the impact of the BESS facility is weighed into the environmental assessment in the Application. D. Protective Provisions • In the event that the Applicant does not engage then Fidra will require the imposition of protective provisions in the Order to protect its assets. **Request for Examination** Fidra respectfully requests that the Examining Authority: • Seek detailed justification from the Applicant for the retention of a cable corridor through the Fidra site in light of our validated planning application and plans for the site. • Require the Applicant to provide routeing alternatives that avoid sterilising our site and to commit, through protective provisions or design refinements, to exclude any alignment that compromises delivery of our project and secure these in the Order. • Encourage a formalised interface agreement between the parties during the Examination period to ensure both energy projects can coexist successfully and, failing that, include protective provisions for the benefit of Fidra in the Order in due course. **In Summary** Fidra remains open to ongoing engagement and supports coordinated infrastructure delivery. However, we must act to protect our substantial and advanced development. The current DCO application, unless modified, undermines this investment and the associated contribution to UK grid stability and net zero targets. We urge the Examining Authority to ensure that the Beacon Fen Energy Park DCO does not prejudice Fidra Energy's project and that appropriate safeguards are incorporated into the Order to that effect.	
RR-032	Mandy Goodhand	Fire Risk - Solar panels will surround three sides of property boundary. Impact on wildlife. Noise from solar farm when up and running. Visual impact on Howell and surrounding areas.	The Affected Person has been identified as holding a Category 3 interest in the Proposed Development, as defined under Section 57(4) of the Planning Act 2008. This interest is set out in Part 2 of the **Book of Reference (PDA-002)**. An **Outline Battery Safety Management Plan (OBSMP) (APP-279)** has been prepared that provides a summary of the safety-related information requirements (to be provided in advance of construction of the BESS). This document identifies the key fire safety provisions for the BESS that are proposed to be installed at Beacon Fen Energy Park, including fire risk reduction measures and fire protection measures, and is intended to demonstrate how the Applicant will use advice from experts in the field and good industry practice to reduce risk to life, property, and the environment from the BESS. This document was developed taking into account the latest NFCC guidance, other prevailing guidance, the project team's experience on other sites and meetings and correspondence with LFR.

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
			Fire is also considered within **ES Chapter 17 Other Environmental Topics (APP-068)**. In terms of the operational phase, extensive noise modelling has been undertaken to date in relation to the operation of the Solar Array Area. The design has been refined as much as possible at this stage to ensure that potential impacts associated with changes in noise levels remain as low as possible. Where required, appropriate mitigation measures have been identified to reduce potential impacts. The plant / equipment to be used may be subject to further refinement at the detailed design / procurement stage to reflect any advancements in technology that may have been made by that time. All likely significant impacts in terms of noise and vibration, along with any mitigation measures required, are considered within **ES Chapter 10 Noise and Vibration (APP-061)**. The Applicant identified the stakeholder as a near neighbour early on and pro-actively engaged with the stakeholder throughout the pre-application consultation stage. A meeting was requested by the stakeholder and held in May 2023, during the early (non-statutory) engagement phase. A further meeting was held in February 2024 to discuss the preferred visual screening measures at the stakeholder's property in further detail, which were accommodated where possible. Open communication with the stakeholder was maintained throughout pre-application consultation, and they were sent regular updates regarding the Proposed Development. All impacts, mitigation measures and enhancements have been fully assessed and detailed within the ES (see **ES Chapter 6 Landscape and Visual (APP-057)** and **ES Chapter 8 Cultural Heritage (APP-059))** and accompanied by a full suite of drawings, figures and plans. The Landscape Design Strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will be further developed and refined during the detailed design stage (i.e. once the DCO is granted for the Project) and is secured by requirement in the **Draft DCO (AS-008)**.
RR-034	Vicarage Drove Energy Centre Limited	Vicarage Drove Energy Centre Limited (VDECL) has leasehold interests in land to the south of Bicker Drove and to the north of Vicarage Drove, Boston PE20 3BQ ("the VDECL Land"). Pursuant to a planning permission granted by Boston Borough Council reference B/21/0443 granted on 17 February 2022 VDECL is currently constructing the solar farm known as Vicarage Drove Solar Farm on the VDECL Land. The anticipated date for energisation of the solar farm is 5th September 2025. The proposed development for which Beacon Fen Energy Park Limited is seeking a DCO ("the Proposed Development") includes compulsory acquisition powers to permanently acquire rights over part of the VDECL Land, being plots reference 18-6, 18-52 and 18-56 as detailed in the Book of Reference (document reference 4.3). As stated in the draft Order for the Proposed Development (document	The Applicant has undertaken numerous rounds of review in order to identify the most suitable Cable Route for the Proposed Development. A summary of this process is set out within Table 3.2 of the **ES Chapter 3 Alternatives and Design Evolution (APP-054)** and discussed further in **Appendix 3.1 Cable Route Corridor Appraisal (APP-079)**. A plan showing the Alternative Cable Corridors is included at **Figure 3.1 Alternative Cable Corridors (APP-197)**. Protective Provisions for the benefit of Vicarage Drove have been proposed by the Applicant to ensure that Vicarage Drove's development is protected from any serious detriment being caused by the Proposed Development. The content of these provisions is subject to ongoing engagement between the Applicant and Vicarage Drove. The Applicant is confident that agreement will be reached, which

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		reference 3.1) the rights are sought to construct, operate, maintain and use Work No. 4A and to construct, operate, maintain, use, inspect and alter any protective works, access works, utility apparatus or other ancillary or related development (as set out in Schedule 1 (authorised development)) in connection therewith. Work 4A, as detailed in Schedule 1 of the draft Order, involves amongst other things works to lay electrical cables including open cut trenching, tunnelling, boring and drilling works for trenchless crossings. Whilst VDECL does not object to the principle of the Proposed Development, the extent of the VDECL Land over which rights are sought is excessive. It is acknowledged that the applicant has adopted a precautionary approach to the land required for its cable run, including optionality as to the route of entry into the Bicker Fen substation to the east of the VDECL Land. Nevertheless, as proposed the draft Order seeks permanent new rights over land which will, from the anticipated date of 5th September 2025 referred to above, include the assets of an operational solar farm. The land parcels within the Order limits accommodate various apparatus including photovoltaic panels and inverters (together with underground/overground cables) along with on-site access tracks. In light of the potential for disruption or damage to this critical energy infrastructure, VDECL wishes to lodge a holding objection to the Proposed Development until such time as appropriate protective measures and/or private agreement is reached. Document reference 4.4 of the DCO submission (Land and Rights Negotiations Tracker) provides an update on engagement between the applicant and VDECL at the point of the application being submitted (at line reference 81). Since submission of the DCO application VDECL has returned amended protective provisions to the applicant for approval. Discussions are ongoing and VDECL has sought further information from the applicant on when it expects to enter into negotiations to secure the rights being sought under the draft Order by voluntary agreement. VDECL has also sought from the applicant further details on the interaction between the Proposed Development and the rights secured by Ecotricity under the Heckington Fen Solar Park Order (including rights over the same parts of the VDECL Land). Document reference 7.1 of the DCO submission explains that NGET proposes to carry out the substation extension works for the Heckington Fen Solar Park Order and the Proposed Development as a single construction programme. VDECL must retain its objection until such time as appropriate protective provisions are agreed and it is satisfied there is agreement as to the coordination of works between the two DCOs. In addition to the powers of compulsory acquisition sought by the applicant, until such time as protective provisions are agreed VDECL objects to the inclusion of the two means of access to Vicarage Drove Solar Farm under Work 10 of the draft Order (and as per document reference 2.4), namely the points of access along Vicarage Drove to the south and Bicker Drove to the north of the VDECL Land. In light of the broad powers sought under Part 3 of the draft Order, VDECL must have assurance that it will continue to have suitable access to Vicarage Drove Solar Farm throughout the course of construction of the Proposed Development and at all times during which Vicarage Drove Solar Farm remains operational, as is critical for its ongoing safe operation and maintenance. VDECL reserves the right to make further representations as part of the Examination of the Proposed Development. VDEC is committed to positive	will enable the representation to be withdrawn; however, in circumstances where it is not possible to reach agreement then the Applicant will put forward final proposed protective provisions to be included in the draft DCO for the protection of Vicarage Drove and make submissions as to why such provisions will ensure the scheme and the proposed acquisition of rights will not have an adverse impact on the Vicarage Drove development.

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
		engagement with the applicant with a view to reaching agreement and will provide further updates to the Planning Inspectorate as necessary.	
RR-026	L.C.J. Mountain Farms	Our client operates a farm at The White House, Great Hale Fen, Sleaford NG34 9LT. As an affected landowner of the proposed DCO, we request that our client is registered as an interested party for the purposes of the Examination process. **Rights and land required** The Applicant is seeking the acquisition of rights and temporary possession of our client's land interests as set out below: • Permanent acquisition of new rights as shown on the land plans (Examination Library Ref APP-008): plots numbered 9.9, 9.11, 11.2, 11.3, 11.4, 11.5, 11.6, 11.7, 11.8, 12.1, 12.2, 12.3, 12.4, 12.5, 12.6, 12.7, 12.8, 12.9, 12.10, 12.11, 12.12, 12.13, 12.14, 12.16, 12.17, 12.18, 12.19, 13.1, 13.2, 13.3, 13.4, 13.6 and 13.8; and • Temporary possession of land as shown on land plans (Examination Library Ref APP-008): plot numbered 13.5. **Grounds of objection** Our client's grounds of objection to the proposed Project can be summarised as follows: 1. failure to properly consider alternative cable routes; 2. environmental impacts; and 3. Impact on intended commercial and infrastructure proposals. **Failure to properly consider alternative Cable Routes** In November 2021, our client offered the Applicant a 516-acre site, including approximately 423 acres of confirmed Grade 3a and 3b land (under the Agricultural Land Classification (ACV)), located approximately 2.7 km from the Bicker Fen substation. This site was offered by our client as a willing landowner and presented an alternative proposal which our client considers should be preferred in terms of closer grid proximity, lower cable corridor requirements, and more cost efficient in infrastructure terms. The Applicant declined this offer in November 2021; not for reasons of technical or planning infeasibility, but due to a stated concern over the Project's "proximity to numerous other solar schemes (and therefore project risk through cumulative impact)". Our client also proposed a further alternative cable route, to the west of its Carre Dyke field to link to the Little Hale Fen Road and queried the Applicant whether the route could, as another alternative, cross lower agricultural grade land to the north of the proposed route. A further suggested alternative new substation site to the south-west of the energy park was suggested too but no response was received. Instead, the Applicant pursued Beacon Fen North and Beacon Fen South, the latter comprising 519 hectares and located between 2.1 km and 5 km further away from the Bicker Fen substation than our client's originally offered land interests. Beacon Fen South was later dropped as a proposal when it was revealed to overlap the site of the proposed South Lincolnshire Reservoir. The Project is	The Applicant responds as follows, adopting (for ease of cross-reference only) the headings used in the representation: **Failure to properly consider alternative Cable Routes** In relation to the assertion that there is, or was, an alternative solar array site preferable to that now being advanced by the Applicant, the Applicant refers to paragraphs 6.2.36 – 6.2.49 of the **Planning Statement (APP-277)** which sets out the applicable law and policy on the consideration of alternatives. Without limiting the full explanation in those paragraphs, it is emphasised that the underlying regulatory requirement for the Applicant's ES is to include a description of the *"reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment"* (Reg 14(2)(d) of the EIA Regulations 2017), and national policy directs that this be undertaken in a *"proportionate manner"* (para. 4.3.22 of NPS EN-1). EN-1 (para. 4.3.9) notes that policy itself *"does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective."* The multi-stage process by which the Applicant satisfied (and the Applicant would submit, surpassed) its legal and policy obligations in this respect is detailed in the Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** and **ES Chapter 3 Alternatives and Design Evolution (APP-054).** This concluded that there are no more suitable locations to make use of the capacity at the Bicker Fen Substation than the site of the Proposed Development. The figures at Annex D of the Site Selection Report demonstrate the constraints identified in the area surrounding the Bicker Fen substation that supported that conclusion. These include (on Figure 8 in Annex D) other existing and proposed solar projects, including Heckington Fen, the location of which informed the Applicant's selection of the Proposed Development site. The Applicant's assessment of cumulative impacts with other projects, including Heckington Fen, is detailed in **ES Chapter 18 Cumulative Effects (APP-069).** As is described in **ES Chapter 3 Alternatives and Design Evolution (APP-054)**, when Beacon Fen South was removed from the Proposed Development, an additional check for land was undertaken to consider whether the addition of new areas of land to Beacon Fen North for a further solar array would better meet the project objectives. It was concluded that this would not achieve the connection date element of the project objectives and it was, therefore, not taken forward. The Applicant recalls that the 516-acre site proposed by LCJ Mountain Farms ('MF') was divided across multiple non-continuous areas. The difficulties of developing a non-continuous site are discussed in para. 3.4.7 of the Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)**. Further, the location

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		significantly less efficient in grid terms than the land previously offered by our client. Since November 2021, the number of grid connection projects in the region has also increased with the Transmission Entry Capacity (TEC) register accepting connection offers into Bicker Fen substation rising from 99.98 MW to 2,613MW which is a substantial increase. The recently consented Heckington Fen Solar Park located just 3.5 km from the Project is an additional grid connection to Bicker Fen and will also add an additional solar scheme in closer proximity to the Project; proximity of other potential projects was one of the reasons our client's offered land was rejected. In light of the recent connections into Bicker Fen substation and additional cumulative impacts with the Project by other schemes including the recently granted solar scheme at Heckington Fen Solar Park (both provided as reasons for our client's previously offered land to be declined), the Applicant should have re-considered the initial land interests offered. In addition, the Applicant's cable route corridor appraisal dated April 2025 (Examination Library Ref APP-079) refers to the 'Additional Alternative Cable Route Corridor' and discounts this for a number of reasons but the Applicant has not: • demonstrated how our client's offer was formally assessed and documented as part of the site selection process (it is not included in the RAG assessment – table 1 of the cable route corridor appraisal); • produced comparative analysis (to our client's knowledge) across Beacon Fen North, Beacon Fen South, and our client's land offer, specifically regarding grid proximity, agricultural land classification, infrastructure cost, and cumulative impact. Instead, the conclusions drawn as to our client's offered route are stated to be based on the potential for local wildlife sites to be affected, the likelihood for a Public Right of Way (PRoW) to be closed for a longer period of time, no reduction in environmental impacts and an increased number of land interests that would be impacted. However, there does not appear to be any evidence provided to support these conclusions. Our client also notes that some of the information included in the Applicant's documentation appears to be incorrect, with LWS (Local Wildlife Site) 4722 not being correctly identified or identified as being impacted, notwithstanding that the proposed cable runs across the LWS, with construction traffic intended to run on top of the LWS and with a construction compound nearby. Additionally, there does not appear to have been any consideration of the recent works from the Viking Link route and working compound on LWS 4722 and which should have been included. The Applicant is also required to ensure that interference with land interests is reasonably necessary and proportionate. We cannot see that an analysis of the land interests affected in the options considered has been assessed on this basis, rather, there is simply a reference to the Applicant having sought to minimise the number of affected interests. We do not therefore believe that the Applicant has properly considered alternatives in terms of site selection and cable route corridors including in relation to the ecological impact of each route or that there is a compelling case in the	of the areas proposed by MF was disadvantageous as compared to the Applicant's Solar Array Area from the perspective of, *inter alia,* agricultural land classification and flood risk, as can be seen by reference to the figures at Annex D of the Site Selection Report for the wider search area (within which the MF sites are situated). In relation to an alternative cable route, **Appendix 3.1 Cable Route Corridor Appraisal (APP-079)** details the multi-stage selection process by which the Applicant identified the Cable Route Corridor. Details of that process are not repeated here but, in summary, it was an iterative process that first identified a general search area and gradually refined potential routes until a single preferred option was concluded. The search area and potential options were revisited following the removal of Beacon Fen South. Despite there being no obligation on an applicant to consider specific proposals suggested by third parties where that applicant has already conducted a lawful and policy-compliant consideration of alternatives, the Applicant here reviewed the alternative cable route proposed by MF and addressed it in paragraphs 5.1.8 – 5.1.11 of **Appendix 3.1 Cable Route Corridor Appraisal (APP-079)** (for the purpose of this response, the "CRCA")**.** As per paragaph 5.1.11, MF's proposed alternative was considered to introduce additional potential impacts to those from the Applicant's Cable Route Corridor, as well as impacting a greater number of land interests. As a result, the Applicant's Cable Route Corridor was concluded to be preferable. By way of further explanation of the points made in paragraph 5.1.10 of the CRCA, the Applicant has included at **Appendix 2** of this document plans showing the Applicant's Cable Route Corridor, MF's proposed alternative route and (i) LWSs, (ii) non-designated heritage assets and (iii) Public Rights of Way in the vicinity. It is apparent from these plans how the Applicant reached the conclusions in paragraph 5.1.10 of the CRCA. In response to specific points raised in the representation, the location of LWS 4722 and its labelling as "Great Hale Eau" on **Figure 7.3 Local Wildlife Sites within 2km of the Site (APP-241)** are taken directly from the data provided by the Greater Lincolnshire Nature Partnership. Paragraph 5.1.10 of the CRCA acknowledged that MF's proposed alternative route would avoid this LWS, as compared to the Applicant's Cable Route Corridor. However, as also stated in that paragraph, MF's proposed route would require crossing, or works in close proximity to, three additional LWS: 1. Mill Drain – this adjoins Little Hale Drove and, therefore, the 30m working width required for construction of the cable would intersect with the LWS or sit directly adjacent to it; 2. Willow Farm Drain – whilst not crossed, the necessary working width for the cable could require works within c. 160m of the LWS; and

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		public interest for our client's rights to be acquired, particularly where our client has offered alternative land interests and which are closer to the Bicker Fen sub-station for grid connection purposes. **Environmental impacts** It is accepted by the Applicant that the cable route corridor will be destructive to soil structure. Chapter 14 of the EIA (Examination Library Ref App-065) states at 14.8.6 that the resulting effect on the receptor 'Land' is Major or Moderate (Significant) but that with the embedded mitigation (which we believe is simply to leave the topsoil in one location and subsoil in another and replace these at the end); the potential resulting effect on the receptor 'Loss of Soil Resource' and 'Damage to Soil Resource' is Minor and Not Significant'. Our client's firsthand experience is that such 'embedded mitigation' is not effective and as such is of the view that the impacts on loss and damage to soil resource will remain significant. The Viking Link project, which also ran a cable corridor through our client's land and undertook the same expected 'embedded mitigation', resulted in significant and lasting damage despite assurances about reinstatement. Our client commissioned professional soil-sampling before and after the Viking Link construction and this concluded that the topsoil structure was considerably worse than before the pipeline was put in. The Applicant's conclusion (for the cable route corridor) on soil impacts is based on findings from high-level desk-based soils and ALC data rather than site-specific soil surveys. Our client's soil surveys evidences that the long-term loss in soil health, productivity, and structure cannot be "restored" through basic reinstatement. Our client therefore disputes the conclusions of the EIA (Environmental Impact Assessment) and requests that further surveys are required to be carried out and in the event the Project is consented, appropriate and sufficient mitigation measures are required to be undertaken so that our client's farm productivity is not impacted and adequate compensation is provided by the Project. Please note that our client is continuing to review the application material and reserves the right to submit further detail at the written representation stage including in respect of impacts of the Project on the environment, protected habitats, biodiversity and drainage. **Impact on intended commercial and infrastructure proposals** The Project's required land interests appear to conflict with a number of intended and important commercial and infrastructure proposals in the Project's area and on our client's land. These projects are not speculative; they are a combination of those supported by completed agreements, Heads of Terms discussions on others, Stage 1 grid offers, and formal submissions to Government — including in respect of the AI Growth Zones programme. In addition, there is local policy support for these projects within the Central Lincolnshire Local Plan policy S14. A brief description of some of these proposals and the potential impact of the Project is set out below. In addition to the below, our client was in advanced commercial discussions on a number of other strategic projects but following the Applicant's contact with at least one of those entities, discussions have ceased and the projects are not now being progressed. There are additional projects	3. Old Forty Foot Drain – this would need to be crossed, with works required within the LWS to lay cable (either via HDD or open cut trenching). For the avoidance of doubt, for the Applicant's Cable Route, construction traffic will not *"run on top of"* LWS 4722 – construction traffic will run adjacent to the LWS and Construction Compound 4 will sit 70m to the south of the LWS. Direct impacts to the LWS will be limited to the crossings only. Potential impacts on the LWSs from construction activity are assessed in **ES Chapter 7 Ecology (APP-058)**, with appropriate mitigation secured through, *inter alia,* **Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)**. The Applicant's ES provides detailed information on the existing ecological baseline with a suite of habitat and species surveys, including a preliminary ecological appraisal undertaken in March 2024; and water vole and otter surveys undertaken during April to June 2024, with secondary surveys undertaken during August and September 2024. It is noted that construction routes and compounds would also have been required for any alternative cable route. In the case of the MF proposed alternative, the necessary routes and compounds could have had a greater impact than those for the Applicant's Cable Route Corridor given the proximity of multiple LWSs to MF's proposed route. This consideration is not reflected in MF's representation. In relation to compulsory acquisition, the Applicant sets out how it has satisfied all relevant legal and policy tests in the **Statement of Reasons (AS-013)**. By virtue of the exercises described above by which the Applicant identified the final site of the Proposed Development (including the Cable Route Corridor), the Applicant has demonstrated that the land and rights to be acquired are no more than are reasonably required for the purposes of the development. As noted in paragraph 5.1.10 of the CRCA, MF's alternative route would impact a greater number of land interests – either 18 or 17 freeholders (depending on whether the current necessary working width is aligned to the north or south of the highway) as compared to the 12 freeholders impacted by the section of the Cable Route Corridor for which MF has proposed an alternative. The Applicant has included at Appendix 3 of this document plans showing the land parcels that would be affected by MF's proposed alternative cable route. Given that more land interests would be affected by MF's alternative route than the Cable Route Corridor, MF's alternative route is not a reasonable alternative to the compulsory acquisition proposed by the Applicant, and would be a less proportionate interference with the rights of interest-holders. This is further emphasised by the fact that the Applicant has now reached voluntary agreements with 14 affected landowners for the Cable Route Corridor. **Environmental impacts** The Applicant has conducted a robust and policy-compliant assessment of likely significant effects on soil, as set out in **ES Chapter 14 Soils and Agricultural**

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		currently in discussion across this area and which the location of the cable route conflicts with. Further details of these proposals may be able to be provided through the examination process. Shaded purple on the plan at Appendix 1 49.9MW solar + BESS Agreement for Lease completed. Planning appeal in progress (hearing expected August 2025). Grid connection secured (connection date: 30.09.2025). This is the first of an intended multi-project proposal which combines renewable energy provision through solar, heat delivery and battery energy storage systems and which are intended to connect across our client's land and which conflict with the proposed cable route. Shaded red and outlined in black on the plan at Appendix 1 Data centre (option 1) Heads of Terms under discussion. EOI submitted to Department for Science, Innovation and Technology under AI Growth Zone programme. Data centre (option 2) Heads of Terms under discussion. EOI submitted to Department for Science, Innovation and Technology under AI Growth Zone programme. The Project's cable route conflicts with a proposed closed-loop system intended to connect the data centre to other proposals on our client's land and future BESS expansion. Shaded blue on the plan at Appendix 1 200MW BESS + final demand Heads of Terms awaited. Designed to power data centres and integrate with the National Gas Transmission pipeline (Hatton–Gosberton), Potential integration with the Viking Link HVDC interconnector to form a hybrid orchestration platform. The Project's cable route conflicts with the intended BESS site. The route also constrains future co-location of the BESS site with a multi-source renewal energy provision. The Project proposes to route the cable in conflict with this emerging energy-food-data corridor risking disruption to the delivery and viability of multiple integrated proposed strategic energy projects. The impact of the Project on these proposals has not been considered by the Applicant notwithstanding our letter dated 8 March 2024 in response to the statutory consultation and completed Land Interest Questionnaire. The cable route corridor appraisal April 2025 (Examination Library Ref APP-079) at paragraph 4.1 refers to the cable route refinement exercise undertaken in May 2023 and the Applicant's intention to incorporate flexibility to accommodate interactions with other proposed and existing developments but the impact of the Project on these proposals has not been properly considered. **Conclusion** In our view the Applicant has not: • adequately considered alternatives to the proposed cable route corridor; • properly assessed the impact of the Project on the long-term soil health and structure and agricultural productivity; • considered the impact of the Project on various strategic commercial and infrastructure proposals; or	**Land (APP-065).** The Applicant cannot comment on the effectiveness of mitigation secured and carried out by another developer on a separate project. The Applicant's assessment of potential impacts on soil in the Cable Route Corridor is based on desk-based information. However, as per para. 14.3.15 of **ES Chapter 14: Soils and Agricultural Land (APP-065**), and as secured by Requirement 16 of the **Draft DCO (AS-008)** and **Appendix 14.4 Outline Soil Management Plan 2024 (APP-176),** the Applicant will carry out a soil survey of the cable route prior to its construction to inform a detailed Soil Management Plan which will set out measures to mitigate construction impacts on soil resource and agricultural land. The Applicant would welcome any constructive comments from MF on **Appendix 14.4 Outline Soil Management Plan (APP-176)** to ensure that it is effective in meeting this purpose. For further information regarding soil surveys in the Cable Route Corridor, the Applicant refers to its response to the relevant representation of Natural England (RR-015) above. The comment that MF is continuing to review the application materials and reserves the right to raise further points is noted, and the Applicant will respond to any such points in due course. **Impact on intended commercial and infrastructure proposals** The Applicant notes that all bar one of the proposals referenced in MF's representation are yet to be subject to settled heads of terms and are therefore at a nascent stage. The only proposal that has been subject to planning is the 49.9MW solar farm with BESS, which is located a substantial distance from the Applicant's Cable Route Corridor and was factored into the Applicant's Site Selection Report in the **Planning Statement (APP-277)** (see item no. 4 on Figure 8 in Annex D). Noting the comment in the representation that this only conflicts with the Proposed Development in its capacity as *"the first of an intended multi-project proposal… which are intended to connect across [MF's] land"*, it is not understood that the project in its own right conflicts with the Proposed Development. Both options for the proposed data centre are also located a substantial distance from the Applicant's Cable Route Corridor. Similarly to the above, the MF representation appears only to assert that the proposed data centre conflicts with the Proposed Development by virtue of a purported "*closed-loop system intended to connect the data centre to other proposals on [MF's] land and future BESS expansion"*, rather than in its own right. These other proposals and the BESS expansion are not particularised and are presumably at an even earlier stage of consideration than the data centre itself, for which there are no settled heads of terms. The reference to expressions of interest ('EOI') having been submitted to the Department for Science, Innovation and Technology is noted, though the Applicant is aware that such EOI do not form part of the formal selection process

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		• properly considered whether the impact of the Project and interference with private land interests is reasonably necessary and proportionate. The Applicant has failed to show that there is a compelling case in the public interest to justify the interference with our client's land interests affected. Our client objects to the Project and requests the opportunity to make representations at any examination hearing. Our client is continuing to review the application material and reserves the right to submit further detail at the written representation stage including but not limited to impacts on the environment, protected habitats and biodiversity. Further, we provided detailed comments and feedback on the proposals in our letter dated 8 March 2024 in response to the statutory consultation on the Project. Most of the points raised in that letter remain to be addressed and resolved. Our client also wishes to note that the Applicant's entry onto our client's land through its representatives Wardell Armstrong in March 2025 was undertaken without sufficient prior notice as to the details, timing and location of the visit. Our client has stated that they were not aware the Applicant's representatives were on their property, which is a working farm and had recently been sprayed. Our client therefore requests that the Applicant ensures that it corresponds sufficiently in advance prior to any required future land entry, particularly given the farming activities carried out on the land. Our client reserves its right to take appropriate action to remedy any unauthorised access.	for AI Growth Zones. The formal selection process has now been open to applicants since 30 April 2025 and requires applicants to establish a threshold level of technical and delivery feasibility. It is assumed from the reference to EOIs only that such formal applications have not been made in respect of the projects referenced by MF. The 200MW BESS also appears to be at a very early stage of consideration, with no heads of terms secured. Given the strength of policy support for nationally significant renewable energy projects such as the Proposed Development, which is a critical national priority (see the **Planning Statement (APP-277)**), none of the early-stage proposals nor the solar project under appeal affect the case in support of the Proposed Development. **Conclusion** The Applicant disagrees with MF's conclusions for the reasons set out above. The Applicant shall respond to any further representations made in due course. It is noted that MF asserts that points remain to be addressed from its previous correspondence with the Applicant, including in response to statutory consultation. The Applicant's response to consultation feedback is described in the **Consultation Report (APP-046)** and its appendices. To the extent that MF continues to hold concerns that it considers have not been addressed in the application, it should set them out in the examination so that the Applicant can consider them and respond.
RR-028	Patricia Lynn Mountain and Leslie Christopher John Mountain	**Rights and land required** The Applicant is seeking the permanent acquisition of new rights over our client's land comprised within their title LL264837. The affected land is marked as plot 12-1 on the Land Plans (Examination Library APP-008). **Holding objection** Our client objects to the Project and requests the opportunity to make representations at any examination hearing. Our client is continuing to review the application material and reserves the right to submit detailed objections at the written representation stage including but not limited to: – Failure to properly consider alternative cable routes; – Environmental impacts; and – Impact on intended commercial and infrastructure proposals.	The Applicant will respond to any future representations made. The Applicant refers to its response to L.C.J. Mountain Farms (RR-026) above in relation to the proper consideration of alternative cable routes, environmental impacts and impacts on intended commercial and infrastructure proposals.

4. Responses to representations from members of the public / businesses

Table 4.1: Responses to representations from members of the public / businesses

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
RR-021	Christopher Barlow on behalf of Barlow household	It is wholly inappropriate to use productive arable land for solar arrays. Our quality of life will be significantly reduced for the 2-3 year building process due to traffic, noise and dust. Solar arrays provide little energy in inclement weather when it is needed.	The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield or lower grade agricultural land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park. Construction has been considered within the ES and mitigation measures are documented within and secured by the **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)** and **Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (APP-077)**, which have been prepared to support the application and are secured by requirements in Schedule 2 to the **Draft DCO (AS-008)**. These documents include measures relating to traffic, noise and dust, amongst other things. As part of the Government's Energy Security Strategy, published April 2022, and advice from the Climate Change Committee - an independent statutory body advising the Government on emission targets and reporting on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change - the UK needs a diverse and flexible mix of energy solutions, generating cheaper, cleaner homegrown energy. Solar PV is part of this energy mix, not only for being able to harness energy from the sun (a free resource) but also because it does not produce any harmful greenhouse gases in the process. It is also the quickest renewable energy technology to build and one of the cheapest forms of renewable power currently available to us.
RR-024	John Ingram	We already have more than enough solar farms in Lincolnshire. These are taking up too much land that is used for food production. when I hear that each farm will supply 100s of thousands of houses with power, all I get is that the electricity will go into the grid for use elsewhere and the price will not come down. Let the Government put panels on all the public buildings for a start and stop blighting the countryside with these unsightly so call 'Farms'.	The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield or lower grade agricultural land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park. The Planning Statement also makes reference to relevant planning policy relating to the need for the Proposed Development, for example paragraph 3.3.20 of EN-1 states that *"Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation)."* **Appendix 4.1 Cumulative Assessment Long List (APP-081)** and **Appendix 4.2 Cumulative Assessment Short List (APP-082)** examine the cumulative impact in terms of other projects in the local area, including food security. Commercial rooftops have not been considered because: (i) there are no known rooftops of sufficient size in the area, and (ii) it is considered that assessing the

			potential for development of multiple rooftops is not comparable or realistic when considered relative to a ground-mounted solar farm, particularly of this scale, and therefore not considered a reasonable alternative.
RR-029	Patrick Sinclair	This solar farm is in completely the wrong place, it should be built on brownfield sites or buildings. This is prime agricultural land, what on earth is going on when we are sacrificing land which feeds people for a project like this? The site is a complete eyesore in a farming community and seems to be all about a few people making enormous amounts of money rather than the benefit that agriculture brings. Some sanity is required and this project should be shelved.	The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield or lower grade agricultural land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park. **ES Chapter 6 Landscape and Visual (APP-057)** reports the assessment of the likely significant effects of the Proposed Development on Landscape and Visual receptors. It comprises a Landscape and Visual Impact Assessment (LVIA) which considers the potential for likely significant effects during construction, operation and decommissioning of the Proposed Development on landscape character and visual amenity. It includes information on embedded mitigation measures. As set out in the **Planning Statement (APP-277)**, there is a Critical National Priority for the Proposed Development and the benefits considerably outweigh the limited adverse impacts. Commercial rooftops have not been considered because: (i) there are no known rooftops of sufficient size in the area, and (ii) it is considered that assessing the potential for development of multiple rooftops is not comparable or realistic when considered relative to a ground-mounted solar farm, particularly of this scale, and therefore not considered a reasonable alternative.
RR-022	Helen Bowler	Loss of agricultural land required to grow food.	The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). Furthermore, **ES Chapter 14 Soils and Agricultural Land (APP-065)** considers the likely significant effects of the Proposed Development on agricultural land (in terms of land lost from agricultural production) and soil resource (in terms of damage, degradation, and loss of soil resource) during the construction, operational and decommissioning phases of the Proposed Development. It should be noted that the majority of impacts on agricultural land will be temporary, and mitigation measures are contained within **Appendix 14.4 Outline Soil Management Plan 2024 (APP-176)**.
RR-025	John Twidle	I object strongly; large areas of industrial buildings / farm building should be used first.	The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park. Commercial rooftops have not been considered because: (i) there are no known rooftops of sufficient size in the area, and (ii) it is considered that assessing the potential for development of multiple rooftops is not comparable or realistic when considered relative to a ground-mounted solar farm, particularly of this scale, and therefore not considered a reasonable alternative.
RR-036	David John Bowler	Use of top-grade agricultural land which is desperately needed for food production. This is being wasted by covering it with solar panels. Solar panels should be on roofs of building and grade 3 and below land.	The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). The Site Selection Report at Appendix 2 of the **Planning Statement (APP-**

		New and very large reservoir being built very close to Beacon Fen and there could be a possibility of flooding problems.	**277)** sets out there are no more suitable locations on brownfield land to make use of the available capacity at Bicker Fen Substation than the proposed Site for the Beacon Fen Energy Park. Commercial rooftops have not been considered because: (i) there are no known rooftops of sufficient size in the area, and (ii) it is considered that assessing the potential for development of multiple rooftops is not comparable or realistic when considered relative to a ground-mounted solar farm, particularly of this scale, and therefore not considered a reasonable alternative. Beacon Fen South was removed from the Proposed Development due to conflicts with Anglian Water's proposed Lincolnshire Reservoir. **ES Chapter 11 Water Resources and Flood Risk (APP-062)**, which includes an assessment of cumulative effects, finds that, with the identified mitigation measures in place, there would be no significant effects upon the water environment and flood risk (offsite or onsite) as a result of the Proposed Development. No cumulative effects are expected with the Lincolnshire Reservoir as, although it is the same surface water catchment, it is not in close proximity (over 5km from the Order Limits) to the Proposed Development and is situated upstream.
RR-027	Michael Weston	Connection route.	While the Applicant is uncertain of the intention of this Relevant Representation and awaits further detail, it is noted that the Proposed Development will be connected to the National Grid at the Bicker Fen substation. The Cable Route Corridor has been refined since the PEIR, informed by environmental surveys and technical assessments to ensure a suitable and viable route to the Bicker Fen substation. **ES Chapter 3 Alternatives and Design Evolution (APP-054)** provides details on the corridor reduction. The use of underground cabling is the adopted standard for the solar industry and is the Applicant's proposed option for the Proposed Development. The underground cabling will be installed predominantly via standard open-cut trenched methods; however, where required, trenchless methods for the crossing of existing infrastructure features will be explored such as Horizontal Directional Drilling (HDD). The working area will include mobile equipment, a haul road and soil stores. Further detail regarding the construction of the Cable Route is available in **Appendix 2.1 Grid Connection Construction Method Statement (APP-074).**
RR-030	Robert Wilford	I am writing to formally object to the application by Beacon Fen Energy Park Limited for an order granting development consent for the Beacon Fen Energy Park (EN010151). I reside at Howell Hall (Redacted) which is situated approximately 200 meters from the proposed development site. My objections to the application are based on several concerns that I believe will have a significant and negative impact on both the local environment and my property. These concerns are outlined below: **Environmental Damage** I am deeply concerned about the potential environmental damage that could result from the development, particularly with regard to the disruption of local ecosystems, soil quality, and natural water systems. The construction and	**Biodiversity** An assessment of the effects of the Proposed Development on Ecology including local ecosystems, waterbodies/watercourses, Local Wildlife Sites, habitats, protected and notable species is provided in **ES Chapter 7 Ecology (APP-058)**. It outlines the survey work which has been undertaken to inform the assessment. The potential for impact on a number of ecology receptors have been identified including Local Wildlife Sites, Special Areas of Conservation, other habitats, protected species and other mammals including deer, brown hares and hedgehogs. This has been used to inform the design and mitigation measures, following which, the assessment has determined that no significant adverse residual effects are anticipated. Proposals for habitat creation, habitat enhancement and management throughout the operational phase are anticipated to provide beneficial residual effects.

		operation of the energy park could lead to irreversible changes to the landscape and local wildlife habitats. **Landscape and Visual Impact** The proposed development would dramatically alter the natural landscape surrounding Howell Hall and other nearby listed properties. Given the scale and nature of the energy park, it would likely result in significant visual intrusion, affecting not only the aesthetic value of the area but also the quality of life for those living in close proximity, including myself. **Loss of Agricultural Land** The development would involve the loss of valuable agricultural land, which I believe is critical to preserving the rural character and local food production capacity of the area. This further diminishes the sustainability of the surrounding area, which relies heavily on agriculture. **Impact on Biodiversity** The loss of habitats for local flora and fauna, particularly species that depend on the agricultural landscape, is a significant concern. This development threatens the biodiversity of the area, which could result in the displacement of wildlife and a decrease in local biodiversity. **Impact on Heritage Sites** Howell Hall is a Grade II listed property located a mere 200 meters from the development site. The proximity of the proposed energy park raises serious concerns regarding potential harm to the heritage and integrity of the building. The noise, visual impact, and potential disturbance during the construction and operation phases may irreparably damage the historical and architectural value of Howell Hall, as well as other listed buildings in the surrounding area. **Noise and Construction Traffic** The noise generated by construction activities and the subsequent operation of the energy park is a major concern. Additionally, the increased construction traffic, particularly large vehicles accessing the site, would cause significant disruption to the local community, including road safety issues and possible damage to local infrastructure. For all of these reasons, I respectfully urge The Planning Inspectorate to reject the application for development consent for the Beacon Fen Energy Park. I believe that the proposed development would cause undue harm to both the local environment and the historical heritage of the area.	The Proposed Development will meet a minimum of 10% and as much as at least 30% net gain in habitat units, at least 10% net gain in hedgerow units and at least 10% net gain in watercourse units, and the **Biodiversity Net Gain Strategy (APP-280)** demonstrates this and the ability to achieve the gain on-site. This is implemented via **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)**, which is secured via a Requirement in Schedule 2 to the **Draft DCO (AS-008)**. **Landscape and Visual Impact** An assessment of the effects of the Proposed Development on Landscape and Visual impact, including residential visual amenity, is provided in **ES Chapter 6 Landscape and Visual (APP-057)**. It finds that the existing woodland and tree groups around residential properties largely screen the views from Howell hamlet. **Heritage Sites** An assessment of the effects of the Proposed Development on Cultural Heritage is provided in **ES Chapter 8 Cultural Heritage (APP-059)** and its appendices. This includes an assessment of the impact on Howell Hall, on which the Proposed Development is predicted to a have a Slight Adverse (Not Significant) impact**.** This has been assessed in terms of the effect on the Hall's immediate setting and wider setting. The Hall's immediate setting comprises the enclosed settlement of Howell Hall and associated designated assets including the Church of St Oswald and the Cross of St Oswald, Grade II*, and a Scheduled Monument, which are well screened to the north, west and east. Key views from the Hall are to the east and the south concerning frontage and access to the road, respectively. Furthermore, the Hall is very well screened to the north by intervening buildings, hedgerows and dense treelines. The wider setting comprises the fields beyond which experience change but are mitigated by a screening buffer. There may be limited and glimpsed views during the winter months resulting in a slight adverse effect on significance and low impact in the worst case. Embedded mitigation measures provide further screening and a set back from the southern portion of the Proposed Development. There is no intervisibility between the associated assets and the Proposed Development. **Agricultural Land** **ES Chapter 14 Soils and Agricultural Land (APP-065)** considers the likely significant effects of the Proposed Development on agricultural land (in terms of land lost from agricultural production) and soil resource (in terms of damage, degradation, and loss of soil resource) during the construction, operational and decommissioning phases of the Proposed Development. The only Major effects identified are temporary and related to the construction of the Solar Array Area, Cable Route Corridor and Bespoke Access Corridor. **Noise & Construction Traffic** **ES Chapter 10 Noise and Vibration (APP-061)** considers the likely significant effects of the Proposed Development on noise and vibration. The Assessment concludes that no construction, operation or decommissioning impact will result in a residual effect of noise or vibration greater than minor adverse, which is not significant in Environmental Impact Assessment terms.

			Appendix 9.1 Transport Assessment (APP-155 to APP-157) and **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)** outlines measures proposed to mitigate the traffic and transport impacts of the Proposed Development, including sustainable patterns of transport development. Through the Outline Construction Staff Travel Plan (oCSTP) (Appendix J to **Appendix 9.1 Transport Assessment (APP-155 to APP-157)**), emphasis is placed on promoting sustainable modes of travel that present a viable option as alternatives to single occupancy car travel. Preparation of a final Construction Traffic Management Plan, substantially in accordance with **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)** is secured via a Requirement in Schedule 2 to the **Draft DCO (AS-008)**. Section 9.6 of **ES Chapter 9 Access and Transport (APP-060)** confirms that due to measures proposed, the access and transport effects of the Proposed Development during construction are negligible. **ES Chapter 15 Socio-economics (APP-066)** concludes that there would be no significant adverse effects in relation to socio-economics, following the implementation of embedded mitigation measures as a part of the Proposed Development. It also discusses beneficial impacts for Gross Value Added and the local workforce.

5. Responses to Late Submissions

Table 5.1: Responses to Late Submissions

RR CODE	CONSULTEE	SUMMARY OF ISSUES RAISED	APPLICANT'S RESPONSE
AS-025	Ministry of Defence ('MOD')	Following review of the application documents, the proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed. The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the Planning Inspectorate website as of the date of this email. Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of defence sites or assets. In the event that any revised plans, amended plans, additional information or further application(s) are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.	It is acknowledged that the MOD considers the Proposed Development to 'pose no detrimental impact on the operation and / or capability of its defence sites and / or asset, and that the MOD has no objection to the development proposed'; this response is welcomed by the Applicant. Should there be a change(s) made to the design proposals, material or otherwise, the MOD (as a Statutory Consultee) will be reconsulted at that time to be made aware of the change(s) and to request a formal response in respect of the change(s).
AS-026	Mr D J Bowler	OBJECTIONS to ENO 10151 1. Waste of large area of top-grade agricultural land desperately needed for food production. Our self sufficiency in food production has fallen from circa 80% to circa 40% which is highly dangerous. 2. The project is against the policy of our elected representatives on Lincolnshire County Council and the Lincolnshire Mayor. 3. There are far too many solar panels being constructed in Lincolnshire when other areas are devoid of such constructions, especially the South East. 4. Bicker Parish has become a dumping ground for electrical infrastructure projects against the wishes of the Parish Council and most residents. The high volumes of traffic with no speed control have caused severe problems for residents. Boston Borough Council specifically stated in its submissions to the Planning Inspectorate for the Triton Knoll scheme that local roads especially Cowbridge Road are unsuitable for construction traffic. This is undoubtedly true but has been ignored by developers. It should be a condition of Beacon Fen that all traffic must use the road off the A17 specifically constructed for electricity projects (at a cost of circa £6 million) without exception, if approval is given. 5. The scheme is too close to the new reservoir to be constructed in the same area, with possible flooding problems. 6. There are numbers of other schemes from National Grid, Solar panels and 5 Battery storage constructions which will clash with this project on Bicker Fen, specifically the cable route, leading to totally unreasonable levels of abuse of local residents over the next few years, as has been the case for the last twenty years.	1. The Proposed Development does not conflict with the relevant Government policies and initiatives regarding food security (e.g. the Government Food Strategy (June 2022)). 2. Tables 4A-4C in Appendix 4 of the **Planning Statement (APP-277)** consider the general accordance of the Proposed Development with the relevant local development plans, being the Central Lincolnshire Local Development Plan, South East Lincolnshire Local Development Plan and the Lincolnshire Minerals and Waste Plan. The Proposed Development is generally considered to accord with the abovementioned Local Development Plan Policies insofar as it makes a significant contribution to the supply of low-carbon energy and has been designed to maximise the delivery of renewable energy while avoiding planning, environmental and other constraints as much as possible. It has been designed to: be resilient to flooding; have acceptable transport effects with mitigation; protect local amenity facilitate health and wellbeing by improving PRoW connections; and safeguard the historic environment through archaeological measures. It also delivers biodiversity net gain and minimises use of best and most versatile agricultural land, with restoration to farming possible after decommissioning. 4. **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)** outlines that the Triton Knoll access road is the construction traffic route for substation upgrade works. This is secured through Requirement 13 of the **Draft DCO (AS-008)**, which requires that a detailed CTMP be submitted and agreed with the highway authority prior commencement of works. This ensures that appropriate measures to ensure construction traffic uses the prescribed routes are in place prior to commencement of construction.

		7. Solar Panels should be restricted to very low-grade land, brownfield sites, and building roofs. 8. This area is already saturated with electrical infrastructure.	5. A flood risk assessment has been undertaken, the findings of which are detailed within **Appendix 11.1 Flood Risk Assessment (APP-162)**) of the ES. Additional consideration of the potential risk of flooding is detailed within **ES Chapter 11 Water Resources and Flood Risk (APP-062)** of the ES. The risk of flooding from fluvial, surface water, groundwater and artificial sources varies across the Site and the findings of the two assessments informed the Site design, with appropriate mitigation measures (see Section 7 of Appendix 11 and Section 11.7 of ES Chapter 11 for full details) intended to prevent flooding included as part of the design proposals. 6. The Proposed Development interfaces with and is in close proximity to a number of other energy projects due to the necessary proximity to the Bicker Fen substation. The Applicant has been in ongoing collaborative communication with the promoters of other interfacing schemes to ensure that any interfaces are managed as effectively as possible and the Applicant anticipates that a suitable resolution can be reached with each adjacent or overlapping scheme ahead of the close of the examination. 7. As set out in Chapter 4 of the **Planning Statement (APP-277)**, significant amounts of new large scale energy infrastructure are required to meet the Government's energy objectives of providing security of supply, providing an affordable, reliable system and ensuring the system is net zero consistent. All generating technologies within EN-1 are urgently required, and there is both urgency and a critical national priority for the provision of nationally significant low carbon infrastructure including large scale solar photovoltaic generation. The Site Selection Report at Appendix 2 of the **Planning Statement (APP-277)** sets out there are no more suitable locations on brownfield or lower grade agricultural land to make use of the available capacity at Bicker Fen substation than the proposed Site for the Beacon Fen Energy Park.
AS-024	Indigo Networks	I can confirm we have no utilities in this location.	The Applicant notes that Indigo Networks has no utilities within the Proposed Development's Order Limits.
AS-027	Northern Gas Networks	Northern Gas Networks do not cover this area.	The Applicant notes that Northern Gas Networks does not cover the Proposed Development's Order Limits.
AS-028	SGN	I don't believe this is in our network area as looks like this is happening In Lincoln which isn't covered by SGN.	The Applicant notes that SGN does not cover the Proposed Development's Order Limits.

Appendix 1: Response to LCC Highways

BEACON FEN ENERGY PARK

Planning Inspectorate Reference: EN010151

Technical Response to LCC Relevant Representation

October 2025

The Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 - Regulation 5(2)(q)

Quality information

Prepared by	Checked by	Verified by	Approved by
KI	SR	IC	IC

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1. Introduction

1.1 Overview

1.1.1 This Technical Response to LCC Relevant Representation is prepared in response to Relevant Representations (RR) received from Lincolnshire County Council (LCC) dated 2nd July 2025 **(RR-002),** regarding highway matters pertaining to the proposed Beacon Fen Energy Park near Sleaford, Lincolnshire (PINS reference EN010151). Appendix 9.1 Transport Assessment (TA) **(APP-155 -157**) accompanies the Draft Development Consent Order (DCO) **(APP-039).**

1.1.2 The RR more specifically outlines that mitigation on Carterplot Road and Great Hale Drove in the form of a passing places scheme is required to facilitate construction access to Cable Route Compounds 3 and 4.

1.1.3 This note was prepared to provide justification that a passing places scheme on Carterplot Road and Great Hale Drove is not considered necessary for the Proposed Development and was used to inform a meeting held with LCC on 10th September 2025 to agree outstanding matters.

1.2 Relevant Representation (RR-002)

1.2.1 The part of the RR from LCC to which this Transport Technical Note relates states:

"The main site would be served by a new haul road from the A17. Most of the construction traffic would not use minor local roads and would access the site from the A17. There are, however, some vehicles which would need to access Compounds 3 and 4 (Para 4.6.3, Table 4.2). These vehicles would use Carterplot Road and Great Hale Drove which are single tracked roads and not suitable for 2 way movements. Mitigation will be required in the form of passing places to be provided along these two roads. There was a recent planning application (Ref 23/1021/FUL) for a 49MW solar farm in this area to North Kesteven District Council (NKDC) which proposed using these roads for construction vehicle access, the application was refused by NKDC (and is currently subject to an Appeal). However a scheme of passing places was proposed for that development and the Council would expect a similar scheme to be proposed for this development."

2. Submitted Information

2.1 Baseline

Carterplot Road

2.1.1 Section 3.2 of Appendix 9.1 Transport Assessment (TA) describes the existing road conditions on Carterplot Road. It is acknowledged that Carterplot Road is a single-track road and measures approximately 3.8m wide. There is signage at the entrance to Carterplot Road near the junction with A17 which states the road is single-track and has passing places (refer Figure 1, below).

2.1.2 There are three locations on Carterplot Road where passing places are already provided. One on the eastern side of the road near the A17 junction, one approximately 430m further south on the western side of Carterplot Road and one approximately 310m further south on the western side of the road (refer Figures 1 to 3, below).

Figure 1: Carterplot Road Passing Place 1 (Source: Google Earth, 2025).

Figure 2: Carterplot Road Passing Place 2 (Source: Google Earth, 2025).

Figure 3: Carterplot Road Passing Place 3 (Source: Google Earth, 2025).

2.1.3 Baseline traffic data collected in January 2025 on Carterplot Road (refer section 3.2.13 and Table 3.1 of the TA) shows that the mean daily traffic flow on Carterplot Road is 258 vehicles, of which 20.2% is classified as Heavy Goods Vehicles (HGV as Heavy Goods Vehicles (HGV) (i.e. vehicles designed for transporting goods with a gross weight exceeding 3,500 kg (3.5 tonnes)). Recorded 85th percentile vehicle speeds are 41.3mph, below the prescribed derestricted (60mph) speed limit.

2.1.4 The alignment of Carterplot Road means that there is good forward visibility to oncoming traffic.

Great Hale Drove

2.1.5 Section 3.2 of Appendix 9.1 Transport Assessment (TA) describes the existing road conditions on Great Hale Drove. It is acknowledged that Great Hale Drove is a single-track road, measuring approximately 3.5m wide, with no passing places. Great Hale Drove is anticipated to be lightly trafficked on the

basis that there is a small number of houses and farms along this section of road.

2.2 Development Generated Traffic

2.2.1 Development generated traffic accessing both Cable Route compounds 3 and 4 will use Carterplot Road.

2.2.2 The proposed access to Cable Route compound 3 on Carterplot Road is approximately 800m south of the junction with A17.

2.2.3 The proposed access to Cable Route compound 4 is at the eastern terminus of Great Hale Drove.

2.2.4 Table 4.3 of the TA quantifies the estimated daily movements of peak construction traffic to Cable Route compounds 3 and 4 as a total of 10 two-way vehicle movements per day (all vehicles). Of these movements, 2 are anticipated to be HGVs (i.e. 1 in each direction per day). All of these vehicles will travel on Carterplot Road during the temporary construction period.

2.2.5 Table 5.4 of the TA summarises the average weekday traffic impact generated by the Development Proposal during the peak construction year on Carterplot Road being 3.8% of all traffic and the same for HGVs. As noted above, Carterplot Road has good forward visibility to compound 3 and there are three passing places in situ that can be utilised.

2.2.6 Only a small number of development generated construction vehicles would continue on Great Hale Drove to/from compound 4 (i.e. 5 two-way vehicles, comprising 1 HGV per day at peak construction). It is anticipated there would be very low opposing traffic on this route as there are a small number of houses and farms.

3. Construction Traffic Management Measures

3.1 Construction Traffic Management Plan (CTMP)

3.1.1 Measures to manage traffic associated with construction of the Proposed Development are described in Appendix 2.4 outline Construction Traffic Management Plan (OCTMP) (**APP-159**) which accompanies the DCO.

3.1.2 The OCTMP outlines the potential to control site traffic including the use of traffic marshals, and proposes that deliveries are scheduled to minimise interaction with other vehicles on the surrounding road network. This would apply to all construction compounds. LCC are the relevant approval body for the Construction Traffic Management Plan (CTMP) as secured via Requirement 13 of the Draft Development Consent Order (DCO) **(APP-039).** LCC will therefore be consulted on the detail to be included within the CTMP.

3.2 Summary

3.2.1 In summary, the development generated traffic impact on Carterplot Road and Great Hale Drove roads is low, will comprise the temporary construction period only, and will be managed through the CTMP. It is therefore considered that a passing places scheme is not required for the Proposed Development.

4. Appeal Decision for 23/1021/FUL

4.1 Land south of Little Hale Drove (23/1021/FUL)

4.1.1 It is noted that a scheme of passing places has been submitted as part of the recently consented planning application for a 49MW solar farm on Land south of Little Hale Drove (ref 23/1021/FUL) (referred to herein as "Land south of Little Hale Drove development"). The application is supported by a Transport Statement (TS) prepared by Axis, dated May 2023. The passing places scheme comprises 8 locations along Carterplot Road and Great Hale Drove as shown on Axis drawing number 3059-01-ATR02, Rev B. PG Consulting drawing number PGC918-C-200 also shows more detailed Section 278 Highway Works for proposed passing places on Great Hale Drove.

4.1.2 The planning application for the Land south of Little Hale Drove development was initially refused in November 2024, with no highways reasons for refusal. The application went to appeal in summer 2025 and a decision was issued on 13th August 2025. The appeal is allowed and within the decision notice, there is a condition relating to passing places on Carterplot Road and Great Hale Drove. Condition 22 states;

"Unless it is confirmed in writing with the Local Highway Authority that passing places along Carterplot Road and Great Hale Drove are not required, then no development shall take place until detailed engineering drawings of the proposed passing places along Carterplot Road and Great Hale Drove, as shown on plan 3059-01-ATR02 Rev B and PGC918-C-200 Rev P2 s ref 3004-01-D04 and 3004-01-D05, and the proposed temporary haul road connecting Great Hale Drove to the development hereby permitted via Old Forty Foot Bank, have been submitted to, and approved in writing by, the Local Planning Authority. No other development shall take place until the passing places and haul road have been constructed in accordance with the approved drawings and have been certified complete in writing by the Local Planning Authority."

4.1.3 The Axis TS quantifies the estimated development generated traffic as being *"a maximum of 191 two-way movements per day during peak activities within the first 4 weeks of construction. This is inclusive of delivery-related movements and staff trips.*

For the remainder of the construction period (24 weeks), there would be a maximum of approximately 128 two-way movements per day on average, inclusive of delivery-related movements and staff trips."

4.1.4 The TS also highlights that the proposed construction traffic route from A17, along Carterplot Road and Great Hale Drove will be required for the entirety of the construction period (i.e. 24 weeks). Therefore, all construction related vehicle trips will be required to use this route. The estimates of development generated traffic associated with construction equate to a traffic impact of approximately 49% on baseline traffic flows on Carterplot Road.

4.1.5 The above confirms that the level of construction traffic estimated per day for the Land south of Little Hale Drove development travelling on Carterplot Road and Great Hale Drove, is notably higher than that estimated for the Proposed Development, which on Carterplot Road is 10 two-way vehicle movements per

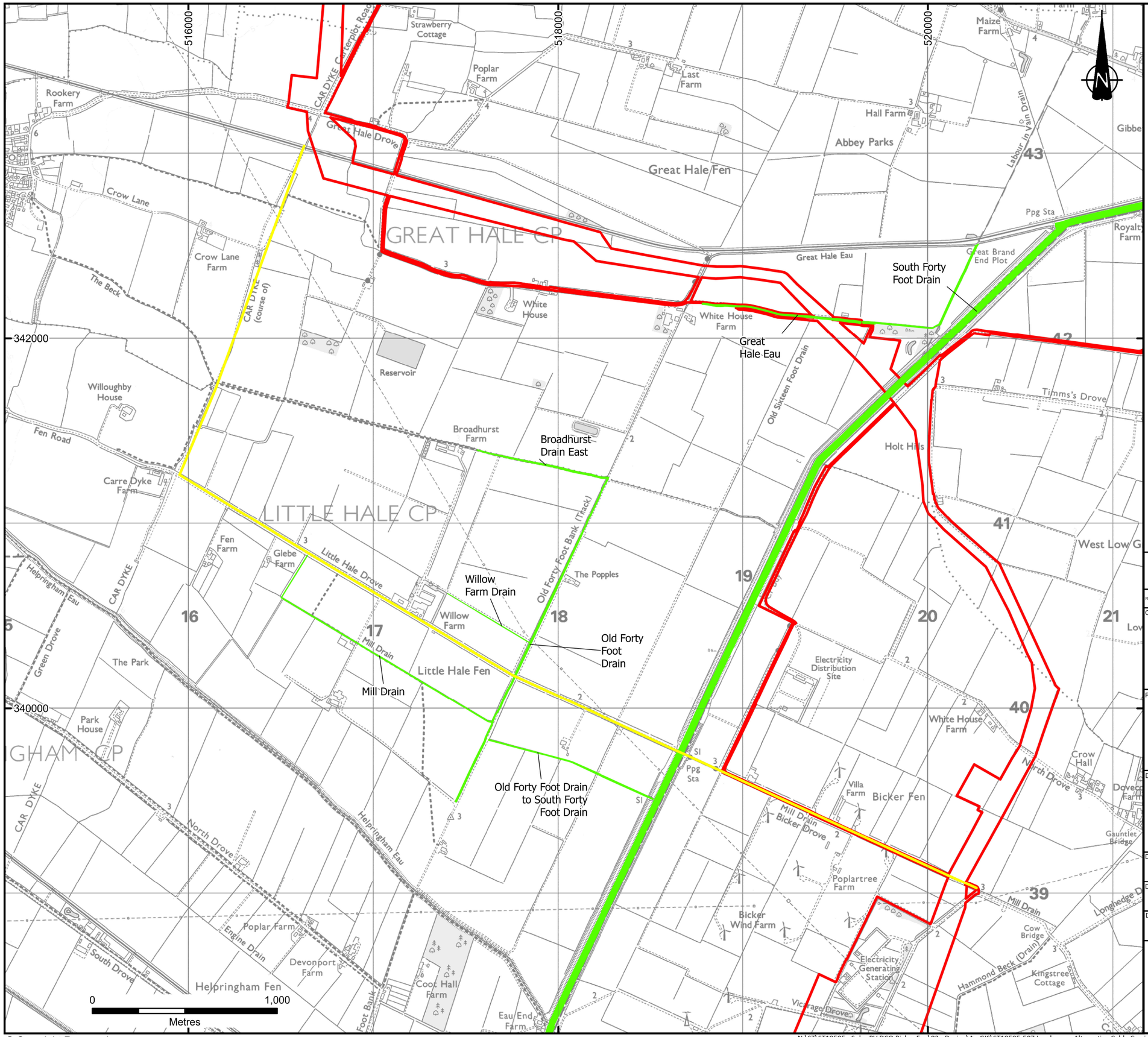
day and a 3.8% impact on baseline traffic. Therefore, the provision of a passing places scheme for Land south of Little Hale Drove development is suitable as there is higher probability of vehicle conflict on the local highway network.

4.1.6 In contrast, the Proposed Development only requires Great Hale Drove for construction access to Cable Route compound 4 and Carterplot Road for construction access to Cable Route compounds 3 and 4, which cumulatively equate to 10 two-way vehicle movements per day and less on Great Hale Drove (as outlined in section 2.2 above).

4.1.7 As noted in paragraph 1.1.3, a meeting was held with LCC highways on 10th September 2025 to discuss the above. LCC confirmed that they agree with the conclusions of this Technical Response that no passing places are necessary on Great Hale Drove. They also confirm that Carterplot Road has sufficient passing places to accommodate the low construction traffic flows that are estimated to use this road during the temporary construction period without causing an unacceptable impact to highways safety.

4.1.8 It is concluded that submission of this Technical Response as an appendix to the Response to Relevant Representations document, that this Relevant Representation is resolved.

Appendix 2: Plans showing the Applicant's Cable Route Corridor, MF's proposed alternative route and (i) LWSs, (ii) non-designated heritage assets and (iii) Public Rights of Way in the vicinity



KEY

- DCO Order Limits
- Local Wildlife Sites
- Landowner Alternative

Notes:

Excluding the DCO Order Limits, boundaries shown are indicative.

DCO Order Limits provided by Ardent Management on 04/02/2025.

LWS Data Provided by the Greater Lincolnshire Nature Partnership ©. LWS data only shown where present within 2km Search Area.

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D
1	FIRST ISSUE	02/10/25	BL	GS	GS

CLIENT

BEACON FEN ENERGY PARK LTD

PROJECT

BEACON FEN ENERGY PARK

DRAWING TITLE

LANDOWNER ALTERNATIVE CABLE CORRIDOR - LOCAL WILDLIFE SITES

DRG No.	REV	SUIT. CODE
ST19595-507	1	--

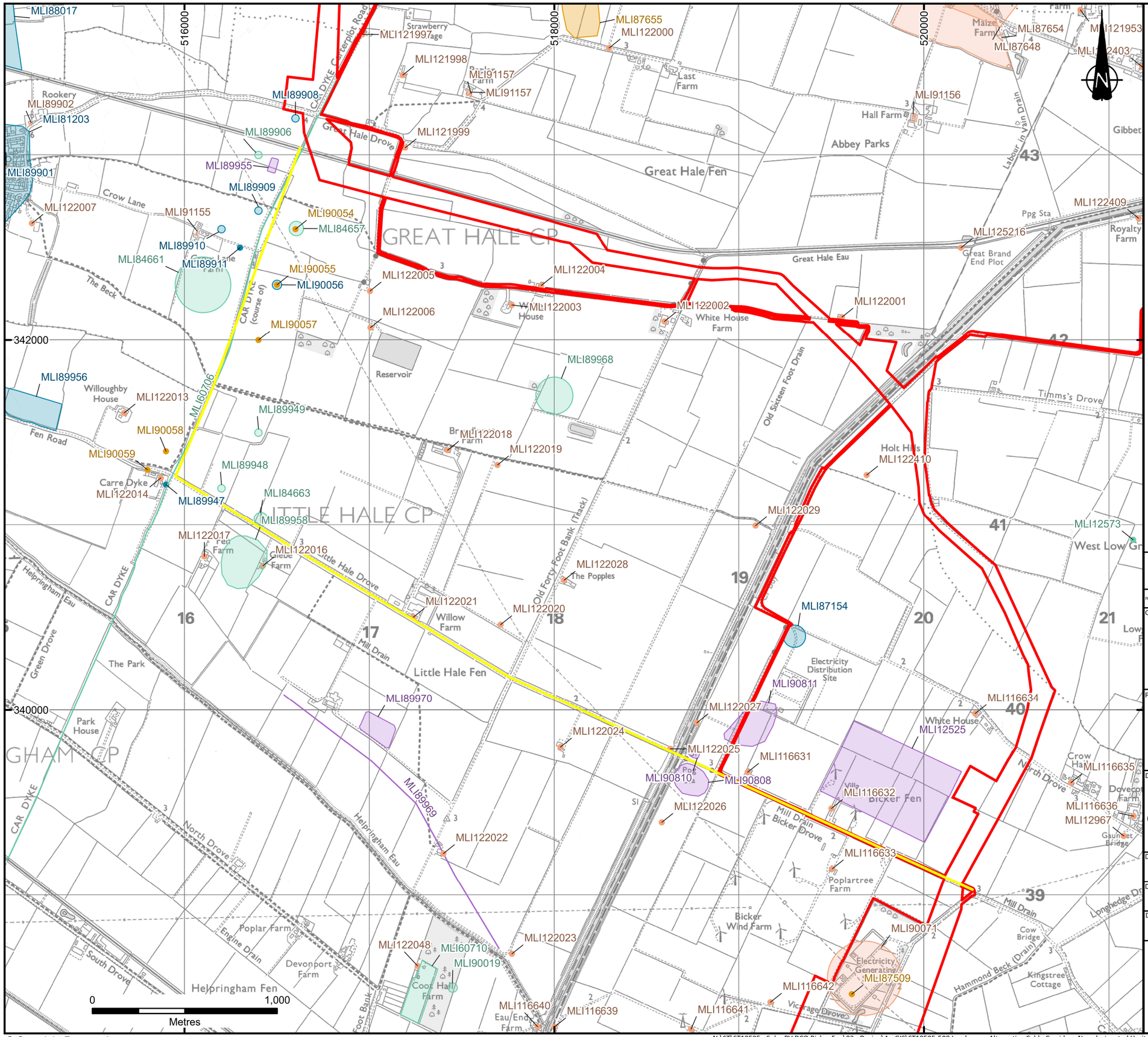
DRG SIZE	SCALE	DATE
A3	1:20,000	02/10/2025

DRAWN BY	CHECKED BY	APPROVED BY
BL	GS	GS

wardell armstrong
PART OF SLR

[redacted]

N:\ST\ST19595 - Solar PV DCO Bicker Fen\03 - Design\ArcGIS\ST19595-507 Landowner Alternative Cable Corridor - Local Wildlife Sites\ST19595-507 Landowner Alternative Cable Corridor - Local Wildlife Sites.aprx



KEY

- DCO Order Limits
- Landowner Alternative

Prehistoric to Bronze-Age
- Polygons
- Points

Iron-Age to Roman
- Polygon
- Lines
- Points

Early-Medieval to Medieval
- Polygon
- Points

Post-Medieval to Modern
- Polygon
- Points

Undated
- Polygons
- Lines

Notes:
Excluding the DCO Order Limits, boundaries shown are indicative

DCO Order Limits provided by Ardent Management on 04/02/2025.

Historic Environment Record Data provided by Lincolnshire County Council.

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D
1	FIRST ISSUE	02/10/25	BL	GS	GS

CLIENT

BEACON FEN ENERGY PARK LTD

PROJECT

BEACON FEN ENERGY PARK

DRAWING TITLE

LANDOWNER ALTERNATIVE CABLE CORRIDOR: NON-DESIGNATED HERITAGE ASSETS

DRG No.	REV	SUIT. CODE
ST19595-508	1	--

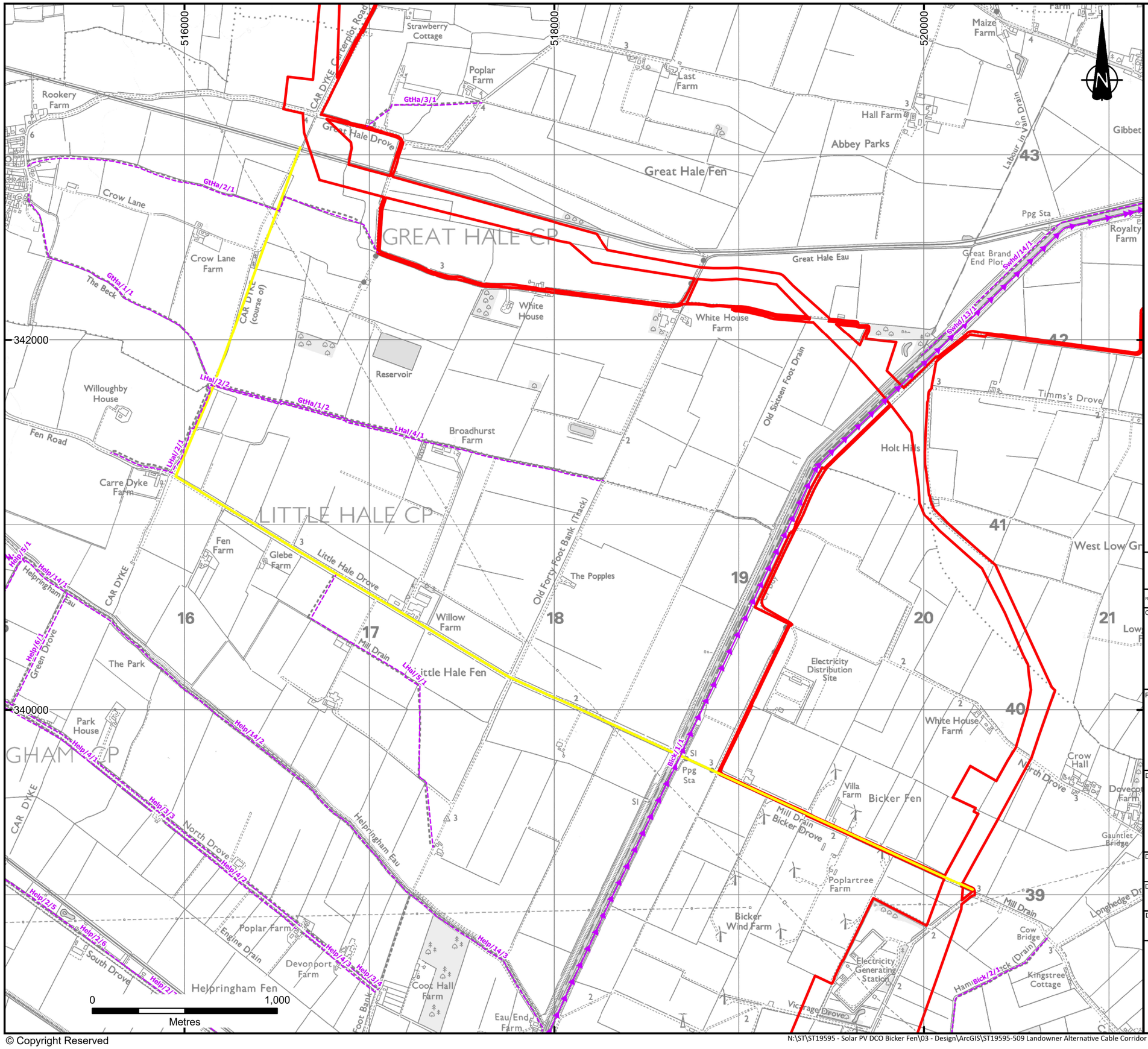
DRG SIZE	SCALE	DATE
A3	1:20,000	02/10/2025

DRAWN BY	CHECKED BY	APPROVED BY
BL	GS	GS

wardell armstrong
PART OF SLR

[redacted]

N:\ST\ST19595 - Solar PV DCO Bicker Fen\03 - Design\ArcGIS\ST19595-508 Landowner Alternative Cable Corridor - Non-designated Heritage Assets\ST19595-508 Landowner Alternative Cable Corridor - Non-designated Heritage Assets.aprx



KEY

- DCO Order Limits
- Landowner Alternative
- Public Footpath
- Public Bridlway
- Restricted Byway

Notes:

Excluding the DCO Order Limits, boundaries shown are indicative.

DCO Order Limits provided by Ardent Management on 04/02/2025.

Public Right of Way (PRoW) data produced by Lincolnshire County Council (LCC) and accessed on Rowmap.com in shapefile format on 24/01/2025. PRoW shapefile data dated 30/09/2024 and may therefore not be up to date. PRoW data shown may contain inaccuracies and errors regarding the location, position and/or alignment of PRoW, and is not the legal representation of the PRoW Definitive Map of Lincolnshire and should therefore not be relied upon. Contains Ordnance Survey data © Crown copyright and database right 2024. Contains public sector information licensed under the Open Government Licence v3.0.

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D
1	FIRST ISSUE	02/10/25	BL	GS	GS

CLIENT

BEACON FEN ENERGY PARK LTD

PROJECT

BEACON FEN ENERGY PARK

DRAWING TITLE

LANDOWNER ALTERNATIVE CABLE CORRIDOR: PUBLIC RIGHTS OF WAY

DRG No.	REV	SUIT. CODE
ST19595-509	1	--

DRG SIZE	SCALE	DATE
A3	1:20,000	02/10/2025

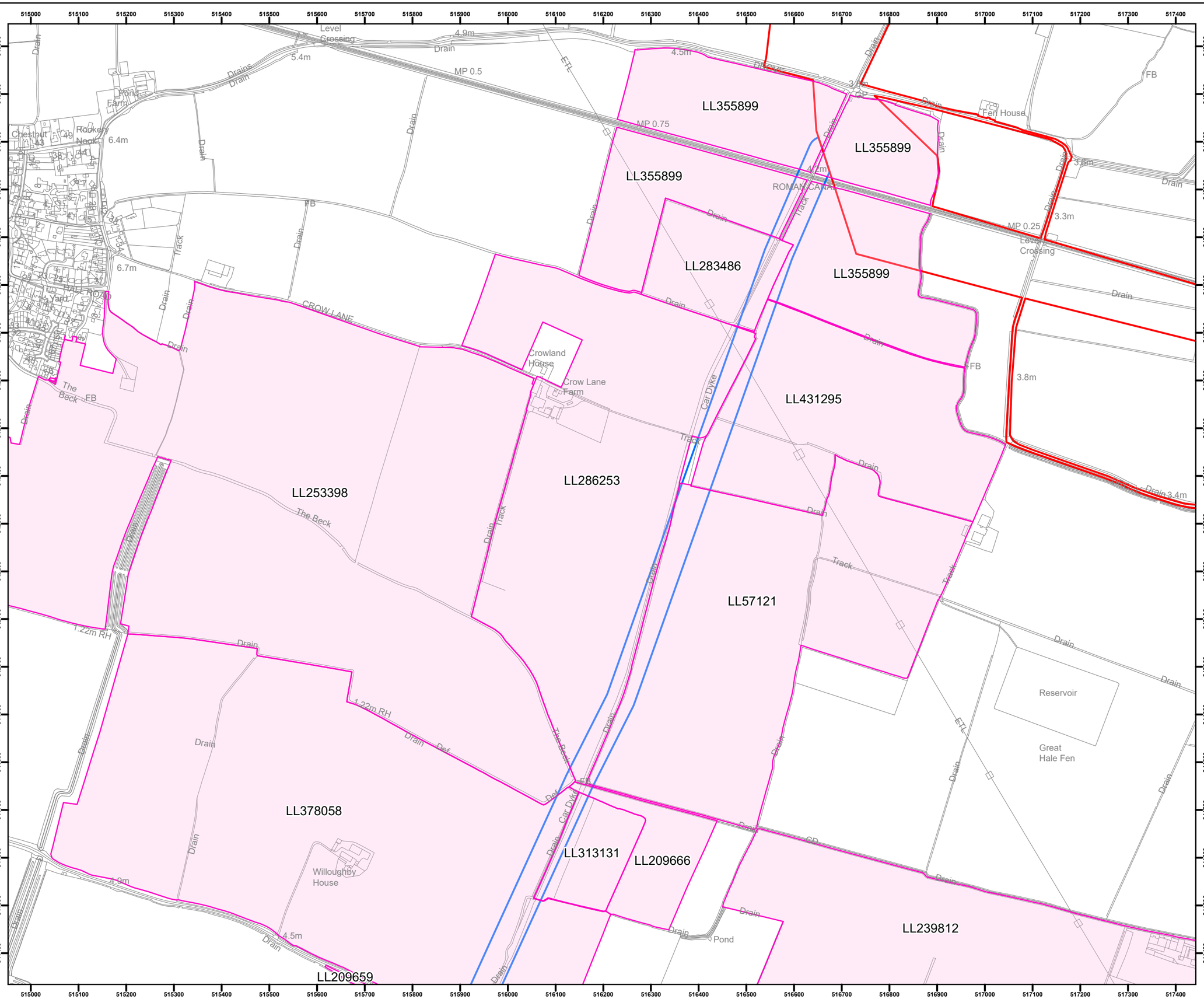
DRAWN BY	CHECKED BY	APPROVED BY
BL	GS	GS

wardell armstrong
PART OF SLR

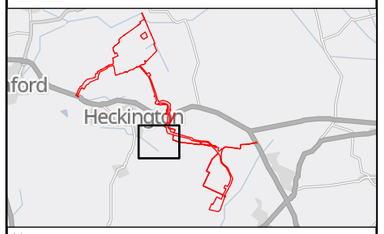
[redacted]

N:\ST\ST19595 - Solar PV DCO Bicker Fen\03 - Design\ArcGIS\ST19595-509 Landowner Alternative Cable Corridor - Public Rights of Way\ST19595-509 Landowner Alternative Cable Corridor - Public Rights of Way.aprx

Appendix 3: Plans showing the land parcels that would be affected by MF's proposed alternative cable route



KEY PLAN



Notes

- Cable route shown is indicative only. Cable may be placed anywhere within Work Package 2 Area.

Key

- DCO Order Limits
- Mountain Alternative Limits
- HMLR Title Extents

Rev.	Date	Description of revision	Drawn	Checked	Review'd	Approv'd
P00	27/01/25	FIRST ISSUE	JNS	LO	CP	PG

Status: FOR INFORMATION
Revision: 00

Client: low carbon — powering tomorrow

Designer: Ardent

Project: BEACON FEN ENERGY PARK

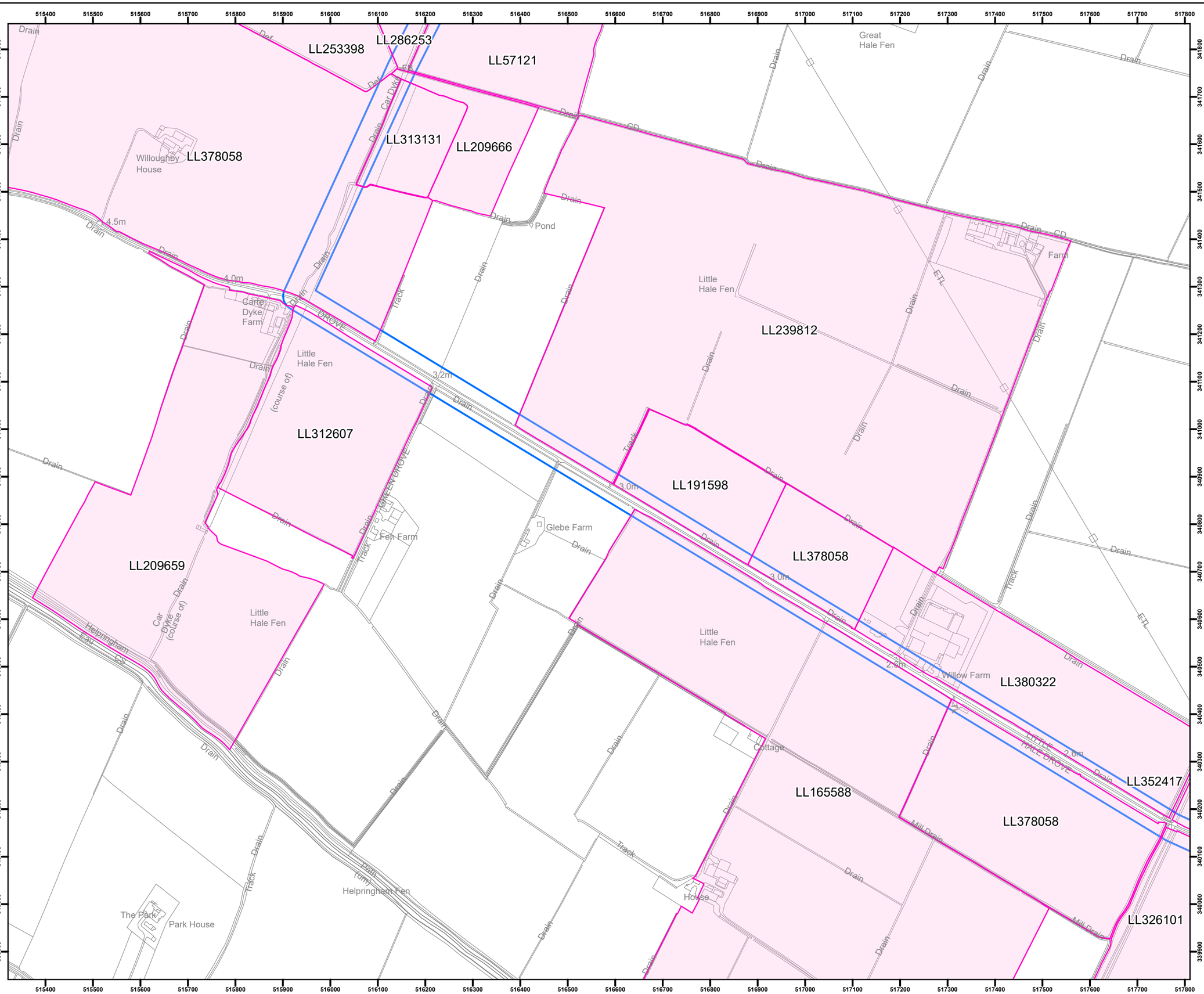
Drawing Title: MOUNTAIN ALTERNATIVE ROUTE

SHEET 1 OF 4

Scale: 1:7,500 @ A3
Spatial Reference System: British National Grid
0 25 50 100 150 200 250 300 Metres

Drawing reference: 085_ARDG_Mountain_Alt

Plot Date: 27 January 2025 10:35
File Name: C:\Users\JakeN\Ardent Management Ltd\Projects - Beacon Fen Energy Park\P16 - GIS & CAD Files\085_ARDG_BFS\085_ARDG_BFS_Mountain_Alternative.aprx



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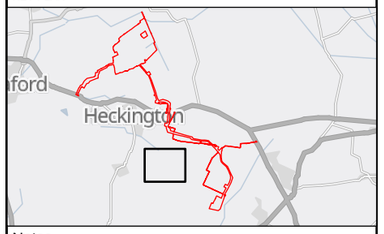

Notes

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Key

- DCO Order Limits
- Mountain Alternative Limits
- HMLR Title Extents

Rev.	Date	Description of revision	Drawn	Checked	Review'd	Approv'd
P00	27/01/25	FIRST ISSUE	JNS	LO	CP	PG

Status: FOR INFORMATION

Revision: 00

Client: low carbon — powering tomorrow

Designer: Ardent

Project: BEACON FEN ENERGY PARK

Drawing Title: MOUNTAIN ALTERNATIVE ROUTE

SHEET 2 OF 4

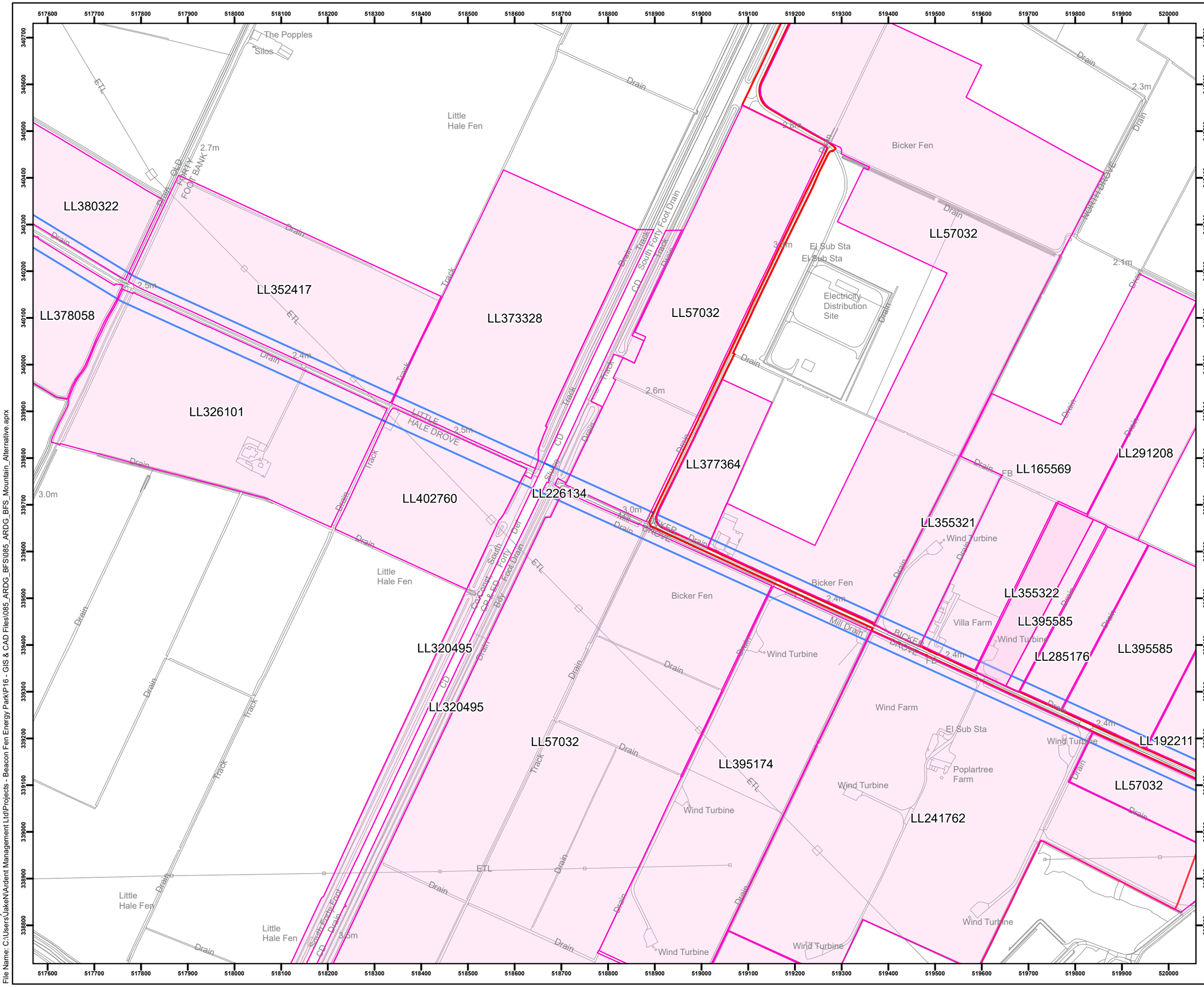
Scale: 1:7,500 @ A3

Spatial Reference System: British National Grid

0 25 50 100 150 200 250 300 Metres

Drawing reference: 085_ARDG_Mountain_Alt

Plot Date: 27 January 2025 10:35
File Name: C:\Users\JakeN\Ardent Management Ltd\Projects - Beacon Fen Energy Park\P16 - GIS & CAD Files\085_ARDG_BFS\085_ARDG_BFS_Mountain_Alternative.aprx



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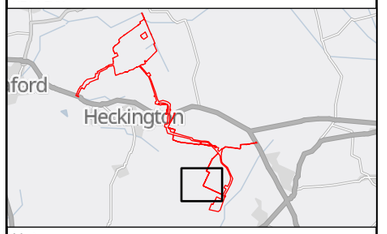

Notes

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Key

- DCO Order Limits
- Mountain Alternative Limits
- HMLR Title Extents

Rev.	Date	Description of revision	Drawn	Checked	Review'd	Approv'd
P00	27/01/25	FIRST ISSUE	JNS	LO	CP	PG

Status: FOR INFORMATION
Revision: 00

Client: low carbon — powering tomorrow

Designer: Ardent

Project: BEACON FEN ENERGY PARK

Drawing Title: MOUNTAIN ALTERNATIVE ROUTE

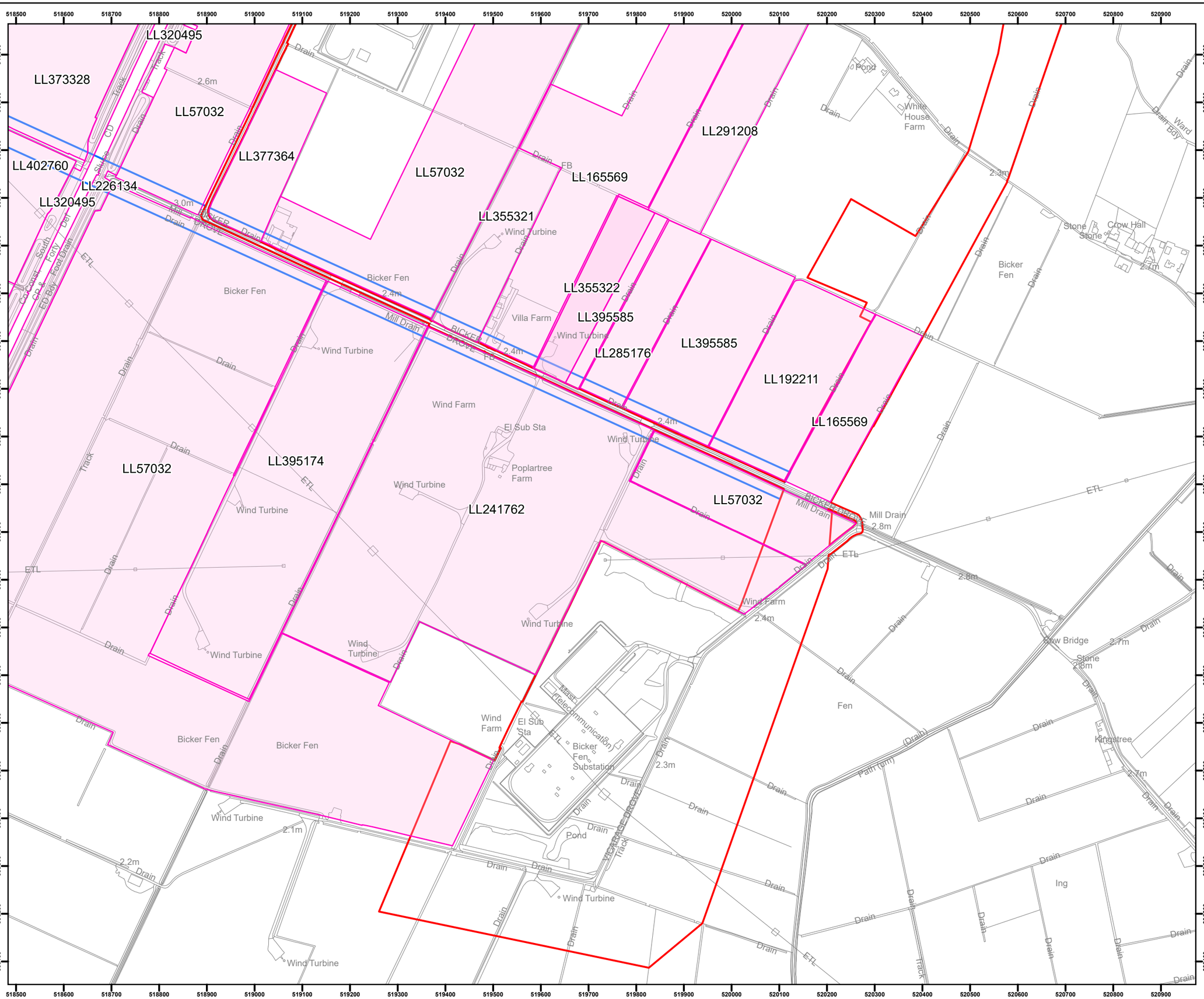
SHEET 3 OF 4

Scale: 1:7,500 @ A3
Spatial Reference System: British National Grid

0 25 50 100 150 200 250 300 Metres

Drawing reference: 085_ARDG_Mountain_Alt

Plot Date: 27 January 2025 10:35
File Name: C:\Users\JakeN\Ardent Management Ltd\Projects - Beacon Fen Energy Park\P16 - GIS & CAD Files\085_ARDG_BFS\085_ARDG_BFS_Mountain_Alternative.aprx



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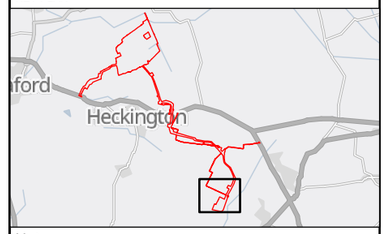

Notes

- Cable route shown is indicative only. Cable may be placed anywhere within Work Package 2 Area.

Key

- DCO Order Limits
- Mountain Alternative Limits
- HMLR Title Extents

Rev.	Date	Description of revision	Drawn	Checked	Review'd	Approv'd
P00	27/01/25	FIRST ISSUE	JNS	LO	CP	PG

Status: FOR INFORMATION
Revision: 00

Client: low carbon — powering tomorrow

Designer: Ardent

Project: BEACON FEN ENERGY PARK

Drawing Title: MOUNTAIN ALTERNATIVE ROUTE

SHEET 4 OF 4

Scale 1:7,500 @ A3 | Spatial Reference System: British National Grid

0 25 50 100 150 200 250 300 Metres

Drawing reference: 085_ARDG_Mountain_Alt

Plot Date: 27 January 2025 10:35
File Name: C:\Users\JakeN\Ardent Management Ltd\Projects - Beacon Fen Energy Park\P16 - GIS & CAD Files\085_ARDG_BFS\085_ARDG_BFS_Mountain_Alternative.aprx