BEACON FEN
ENERGY PARK

Planning Inspectorate Reference: EN010151

Applicant's Comment's on Local Impact Reports

Document Reference: 9.7

October 2025

The Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Glossary

Abbreviation	Description
AC	Alternating Current
AADT	Annual Average Daily Traffic
AIA	Arboricultural Impact Assessment
AIL	Abnormally Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
AONBs	Areas of Outstanding Natural Beauty
Applicant	Beacon Fen Energy Park Ltd
BESS	Battery energy storage system
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BoR	Book of Reference
CAP	Climate Action Plan
CCTV	Closed circuit television
DC	Direct Current
DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
DNOs	District Network Operators
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
EMF	Electromagnetic Fields
ExA	Examining Authority
ExQ1	Examining Authority's Written Questions 1
GIS	Gas Insulated Switchgear
GLEEP	Greater Lincolnshire Local Enterprise Partnership
GLVIA3	Guidelines for Landscape and Visual Impact Assessment 3rd Edition
GVA	Gross Value Added
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitat Regulations Assessment
HSE	Health and Safety Executive
HV	High Voltage
ICIMOS	International Council on Monuments and Sites
IDB	Internal Drainage Board
IPs	Interested Parties
LCC	Lincolnshire County Council
LEMP	Landscape and Ecological Management Plan
LITGN-2024-01	The Landscape Institute Technical Guidance Note
LIR	Local Impact Report
Low Carbon	Low Carbon Ltd
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
MW	Megawatts
NETS	National Electricity Transmission System

Abbreviation	Description
NCA	National Character Area
NGR	National Grid Reference
NKDC	North Kesteven District Council
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
NPPF	National Planning Policy Framework
oBSMP	Outline Battery Safety Management Plan
oCEMP	Outline Construction Environmental Management Plan
oCTMP	Outline Construction Traffic Management Plan
oLEMP	Outline Landscape and Ecological Management Plan
oSMP	Outline Soil Management Plan
Order	The Beacon Fen Energy Park Order
PAS	Potential alternative sites
PCU	Power Conversion Unit
PEIR	Preliminary Environmental Impact Report
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
Receptor R4	Residential receptors at Gashes Barn
REP1-018	Statement of Common Ground with NKDC
RR	Relevant Representation
RVAA	Residential Visual Amenity Assessment
RVAT	Residential Visual Amenity Threshold
SAC	Special Areas of Conservation
SHDC	South Holland District Council
Site	The entire draft Order Limits or red line boundary located approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SSR	Site Selection Report
SuDS	Sustainable Drainage System
TCE	The Crown Estate
TCPA	Town and Country Planning
WMS	Written Ministerial Statement
ZoI	Zone of Influence

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Appendix 1: Applicant Responses to NKDC's Appendix C

1. Introduction

1.1.1 This **Applicant's Comments on Local Impact Report (Document Ref. 9.7)** document has been prepared on behalf of Beacon Fen Energy Park Ltd (the 'Applicant') in support of an application for a Development Consent Order ('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 summarises the Applicant's Comments on the **Local Impact Reports ('LIRs') from Lincolnshire County Council (REP1-044)**, **LIRs from North Kesteven District Council (REP1-054)** and **LIRs from South and East Lincolnshire Councils Partnership – Boston Borough Council (REP1-059)** as submitted to the PINS website on 10 October 2025 in relation to the application for development consent (Application) for the Beacon Fen Energy Park (the Proposed Development).

1.1.3 The structure of this document follows the order in which the LIRs are referenced in the Examination Library and the order in which topics are raised within the LIRs.

1.1.4 This document is structured as follows:

- Section 2 provides the Applicant's Comments on the **LIRs from Lincolnshire County Council (REP1-044)**;
- Section 3 provides the Applicant's Comments on the **LIRs from North Kesteven District Council (REP1-054)**; and
- Section 4 provides the Applicant's Comments on the **LIRs from South and East Lincolnshire Councils Partnership – Boston Borough Council (REP1-059)**.

1.1.5 The Applicant includes at Appendix 1 of this document the Applicant's Response to Ecology Review which is included at Appendix C of **NKDC's Relevant Representation (RR-004)**. Please note, the Ecology Review is also included at Appendix C of **NKDC's LiR (REP1-054)** and **NKDC's Written Representation (REP1-056)**.

2. Applicant's Comments on Lincolnshire County Council Local Impact Report (REP1-044)

Table 2.1 – Applicant's Comments on Lincolnshire County Council Local Impact Report (REP1-044)

PARAGRAPH NUMBER	LIR TEXT	APPLICANT'S RESPONSE
5	**Policy Context**	
5.1	The Secretary of State (SoS) is required to have regard to any relevant National Policy Statement (NPS), amongst other matters, when deciding whether to grant a DCO. Where there is a relevant NPS in place DCO applications are determined in line with Section 104 of the PA2008. However, where there are no relevant NPS in place then Section 105 of the PA2008 takes effect and provides the legal basis for determining DCO applications. In addition to any relevant NPS, Section 104 requires the SoS to also have regard to any LIR and any matters which the SoS thinks are both important and relevant to its decision.	The **Planning Statement ('PS') (APP-277)** which is in accordance with S104 of the PA2008, has regard to the relevant energy National Policy Statements (EN-1, EN-3 and EN-5).
5.2	The following NPS's (dated November 2023) that came into force 17 January 2024 are considered relevant to the determination of this DCO application:	As above.

5.3	The following NPS's (dated November 2023) that came into force 17 January 2024 are considered relevant to the determination of this DCO application:	As above.
5.4	EN-1 sets out the overarching needs case for different types of energy infrastructure and general assessment principles. Solar PV is identified as generation technology within the scope of this NPS.	As above.
5.5	Section 3.2 of EN-1 requires the SoS, in decision making, to assess all applications for development of the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of development which is urgent. The government has concluded that there is a critical national priority for the provision of nationally significant low carbon infrastructure for both energy security and net zero.	Section 6 of the **PS (APP-277)** outlines how the Proposed Development meets the EN-1 definition for Critical National Priority ('CNP').
5.6	Solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and that the government expects a five-fold increase in solar deployment by 2035 (up to 70GW). It is also stated that solar farms can be built quickly and coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large scale solar is now viable in some cases to deploy subsidy free.	This comment is noted.
5.7	This NPS sets out key considerations and factors that will need to be taken into consideration when selecting sites and these include irradiance and site topography, proximity of site to dwellings, agricultural land classification and land type, accessibility, public rights of way, security and lighting and grid connectivity. The technical considerations are set	The Site Selection report which is located within Appendix 2 of the **PS (APP-277)** considers the identified key considerations and factors within the assessment. The key technical considerations outlined in the NPS are assessed within the **ES (APP-050 to APP-070)** with mitigation of impacts outlined within **ES Appendix 2.3**

	out in and include capacity of the site, site layout design and appearance, project lifetimes and flexibility. Impacts that will need to be considered are set out and include biodiversity, ecology, geological conservation, water management, landscape, visual and residential amenity, glint and glare, cultural heritage, construction including traffic and transport noise and vibration.	**Embedded Mitigation (APP-076)** and secured through the **Draft Development Consent Order ('Draft DCO') (Document Ref: 3.1)**.
5.8	EN-5 is also of relevance as it recognises electricity networks as "transmissions systems (the long-distance transfer of electricity through 400kV and 275kV lines), and distribution systems (lower voltage lines from 132 kV to 230V from transmission substations to the end-user) which can either be carried on towers/poles or undergrounded" and "associated infrastructure, e.g. substations (the essential link between generation, transmission, and the distribution systems that also allows circuits to be switched, or voltage transformed to a useable level for the consumer) and converter stations to convert DC power to AC power and vice versa". This is therefore relevant in so far as it relates to the cable route corridor and proposed grid connection.	This is agreed with as set out in the **PS (APP-277)**. We consider NPS EN-5 does not have 'effect' but has importance and relevance to the determination of the Proposed Development under Section 104(2)(d) of the 2008 Act, in particular the development within the Cable Route Corridor. Therefore, the Proposed Development has been assessed against EN-5 within Appendix 3C of the **PS (APP-277)**.
5.9	On 24 April 2025 the Government published a consultation on revisions to EN-1, EN-3 and EN-5 with the aim of strengthening the process for delivering major infrastructure in England and Wales and reinforcing the government's ambition to deliver Clean Power by 2030 and net zero.	This comment is noted.
5.10	Whilst the review is undertaken, the current suite of energy NPS's remain relevant and have effect for the purposes of the Planning Act 2008.	The current energy NPSs have been assessed against the Proposed Development within the **PS (APP-277)**.

5.11	Where applicable, the Council further references the NPSs under the technical chapter sub-headings below insofar as they relate to matters which the Examining Authority should have regard to:	The relevant sections referencing the NPS have been responded to below.
5.12	The 'Clean Power 2030 Action Plan: A New Era of Clean Electricity' was published in December 2024 and is the UK government's roadmap to transform the nation's electricity system so that 100% of electricity demand is met by clean power by 2030, with at least 95% of generation coming from low-carbon sources and no more than 5% from unabated gas.	The 'Clean Power 2030 Action Plan: A New Era of Clean Electricity' is assessed against the Proposed Development within Section 4 of the **PS (APP-0277)**
5.13	**National Planning Policy Framework** The National Planning Policy Framework (NPPF) was first published in 2012 and updated in 2018, 2019, 2021, 2023 and 2024. Paragraph 5 of the NPPF states that the document does not contain specific policies for NSIPs. NSIPs are to be determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs which form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.	The December 2024 version of the National Planning Policy Framework ('NPPF') has been assessed against the Proposed Development within the **PS (APP-277)** with Appendix 4A of the **PS (APP-277)** outlining how the Proposed Development accords with the NPPF.
5.14	The Labour government elected in 2024 aims to re-instate mandatory housing targets and local authorities to have a 5-year land supply for housing. They have removed the idea of 'beauty', have updated the 'presumption in favour' of sustainable development and have redefined the classification of areas of Green Belts to include 'grey belt'.	This comment is noted.

5.15	The National Planning Policy Guidance (NPPG) outlines guidance on the specific planning considerations that relate to large scale ground-mounted solar PV farms. It encourages the effective use of previously developed land, and if a proposal does involve greenfield land, that it allows for continued agricultural use and/or encourages biodiversity improvements around arrays. It also states that local authorities should consider the effect of glint and glare on landscape, on neighbouring uses and aircraft safety in addition to taking great care to ensure heritage assets are conserved in a manner appropriate to their significance.	The National Planning Policy Guidance ('NPPG') has been taken into account when assessing the Proposed Development as outlined in the **PS (APP-277)**, An assessment of the PDL/brownfield land registers of Local Planning Authorities ('LPAs') was undertaken, in line with the NPPG, within Appendix 2: Site Selection Report of the **PS (APP-277)**. The effects of glint and glare have been assessed with the **ES Chapter 13 Glint and Glare (APP-064)** with mitigation outlined in **ES Appendix 2.3 Embedded Mitigation (APP-076)** which is secured by the **Draft DCO (Document Ref: 3.1)**.
5.16	**Written Ministerial Statements** The potential impacts of large-scale solar farms were also addressed through a speech by the then Minister for Energy and Climate Change to the solar PV industry on 25 April 2013 and subsequent Written Ministerial Statements (WMS). The speech highlighted the importance of considering the use of low grade agricultural land which works with farmers to allow grazing in parallel with generation, and the WMS (dated 25/3/15 - UIN HCWS488) stressed that meeting our energy goals should not be used to justify the unnecessary use of high quality agricultural land, noting that 'any proposal for a solar farm involving the BMV agricultural land would need to be justified by the most compelling evidence'.	The **PS (APP-277)** refers to the most recent Written Ministerial Statement ('WMS') from 30 July 2024, which refers to boosting the delivery of renewable energy, which it describes as "*critical to meeting the Government's commitment to zero carbon electricity generation*". In reference to the speech made by the Minister for Energy and Climate Change on 25 April 2013 and the Written Ministerial Statement dated 25 March 2015 the Applicant notes that Government policy has been superseded subsequently and does not consider them to be important or relevant to the determination of this Application.
5.17	On 15 May 2024, a WMS was published on solar infrastructure and protecting food security and BMV land. The Council notes that the 15 May 2024 WMS captures elements of the 2024 NPS's. In particular, the 2024 WMS emphasises that when considering whether planning consent should be granted for solar development the	The Applicant makes reference to the 15 May 2024 WMS in their response to ExQ1 LUS.1.1 **((Applicant's Responses to the ExAs ExQ1, Document Ref. 9.6)** submitted alongside this document.

	cumulative impacts where several proposals come forward in the same locality are an important consideration (particularly in places like Lincolnshire). This WMS has not been revoked or replaced.	
5.18	Notwithstanding, the NPSs provide the predominant policy context.	The relevant energy NPSs have been assessed against the proposed development within Appendix A, B and C of the **PS (APP-277)**.
5.19	**Development Plan** For the purpose of Section 38(3) of the Planning and Compulsory Purchase Act 2004, the relevant documents that comprise the development plan in force in the area and of relevance to the DCO application are set out below. Other policy documents that should be considered as material considerations are also identified.	This comment is noted.
5.20	**Central Lincolnshire Local Plan** The Central Lincolnshire Local Plan 2023-2043 (CLLP) was adopted April 2023, replacing the Central Lincolnshire Local Plan adopted in 2017. The relevant policies are: • **Policy S1: The Spatial Strategy and Settlement Hierarchy** – Reason: The development would be located in the countryside. • **Policy S5: Development in the Countryside** – Specifically Part E: Non-Residential development in the country. The reason for this is because of the criterion to be considered that *"The development is of a size and scale commensurate with the proposed use and with the rural character of the location."*	The Central Lincolnshire Local Plan is assessed against the Proposed Development within Appendix 4B of the **PS (APP-277)** where all the policies identified here were assessed apart from Policy S62. Policy S62: Area of Outstanding Natural Beauty and Areas of great Landscape Value was not assessed within the **PS (APP-277)** due to there being no Areas of Outstanding Natural Beauty of Areas of Great Landscape Value within close proximity to the Site. For this reason, this policy was not included in the list of relevant local development plan policy which was shared and agreed with LCC in the Pre-Application period, as set out in the **Statement of Common Ground with Lincolnshire County Council (REP1-016)**.

- **Policy S12: Water Efficiency and Sustainable Water Management** – Reason: To encourage infiltration, as Central Lincolnshire is identified as being within an area of serious water stress and to reduce energy demand on the water recycling network.
- **Policy S14: Renewable Energy** – Reason: To consider if the impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings, and the historic landscape; and highway safety and rail safety.
- Policy S14 states that proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual, and cumulative impacts of development on a number of considerations are, or will be made, acceptable**.**
- **Policy S16: Wider Energy Infrastructure** – recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure for the transition to net zero taking subject to mitigation, appropriate locations and good design to minimise harm.
- Policy S16 states that the Joint Committee is committed to supporting the transition to a net zero carbon future and, in doing so, recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure. Support will be given to proposals

which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include energy storage facilities and upgraded or new electricity facilities or other electricity infrastructure. This policy however caveats that any such proposals should take all reasonable opportunities to mitigate any harm arising from such proposals and take care to select not only appropriate locations for such facilities but also design solutions (reference to policy S53) which minimises harm arising.

- **Policy S21: Flood Risk and Water Resources** – Reason: some of the site is in high flood risk zones.
- **Policy S47: Accessibility and transport** – Reason: the development involves traffic on the highway network.
- **Policy S48: Walking and Cycling Infrastructure** – Reason: to protect, maintain and improve existing infrastructure, including closing gaps or deficiencies in the network and connecting communities and facilities; this being relevant to the PRoWs.
- **Policy S53: Design and Amenity** – Reason: all development, including extensions and alterations to existing buildings, must achieve high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all.
- **Policy S54: Health and Wellbeing** – Reason: This policy aims to ensure adequate access to

nature, which might run counter to the development essentially "taking away" open green space.

- **Policy S57: The Historic Environment** – Reason: to protect heritage assets, above and below ground and on the site**.**
- **Policy S59: Green and Blue Infrastructure Network** – Reason: relevant because of the nature of the development itself or the development impacts on PRoWs.
- **Policy S60: Protecting Biodiversity and Geodiversity** – Reason: Due to the need to ensure that adverse impacts of development are adequately mitigated.
- **Policy S61: Biodiversity Opportunity and Delivering Measurable Net gains –** Reason: delivering at least a 10% biodiversity net gain is an ambition that all DCO projects are working towards, as it will become mandatory for projects of this size to comply with biodiversity net gain (BNG) targets in 2026**.**
- **Policy S62: Area of Outstanding Natural Beauty and Areas of great Landscape Value** – Reason: relevant because of the cumulative impacts on landscape and visual impacts.
- **Policy S66: Trees, Woodland and** Hedgerows – Reason: due to the trees and hedgerows within and around the site boundaries and the potential for a proportion of these to be removed to enable the development to progress.
- Policy S67: Best and Most Versatile Agricultural Land – Reason: there is BMV land present on all

	three parts of the site and in the cable route corridor.	
5.21	**Neighbourhood Plan** There are no adopted neighbourhood plans within the proposed development area.	This comment is noted.
5.22	**South East Lincolnshire Local Plan (adopted March 2019)** The policies that are relevant to the consideration of the proposal are as follows: • **Policy 1: Spatial Strategy** – Reason: the development would be located within the countryside. • **Policy 2: Development Management** – Reason: proposals requiring planning permission must achieve sustainable development considerations. • **Policy 3: Design of New Development** – Reason: design should be appropriate and maximise opportunities for improving the character and quality of an area. • **Policy 4: Approach to Flood Risk** – Reason: some of the site is located in high flood risk zones. • **Policy 28: The Natural Environment** – Reason: the need to protect, enhance and manage natural assets. • **Policy 29: The Historic Environment** – Reason: to protect heritage assets, above and below ground and on the site.	The South East Lincolnshire Local Plan is assessed against the Proposed Development within Appendix 4C of the **PS (APP-277)** where all the policies identified here were assessed apart from Policy 33. The Proposed Development is considered to accord with policy 33: Delivering a More Sustainable Transport Network as impacts on the Transport network are assessed within **ES Chapter 9 Access and Traffic (APP-060)** which is supported by the **ES Appendix 9.1 Transport Assessment (APP-155 to APP-157)** and the **ES Appendix 9.3 OCTMP (APP-159)**. These assessments show that the Proposed Development makes the best use of existing transport infrastructure and services connecting to the Site, with the **ES Appendix 9.1 Transport Assessment (APP-155 to APP-157)** outlining the assessment which took place to determine the optimal transport routes. Existing footpaths, cycle routes and PRoWs have been protected as outlined within **ES Chapter 15 Socio-economics (APP-066)** and **ES Chapter 6 Landscape and Visual (APP-057)**. 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

	• **Policy 30: Pollution** – Reason: Development proposals will not be permitted where, taking account of any proposed mitigation measures, they would lead to unacceptable adverse impacts. • **Policy 31: Climate Change and Renewable and Low Carbon Energy** – Reason: the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies on existing or proposed structures will be permitted providing, individually, or cumulatively, there would be no significant harm. • **Policy 33: Delivering a More Sustainable Transport Network** – Reason: relevant because of the nature of the development itself or the development impacts on PROW.	secured by Requirement 15 in Schedule 2 of the **Draft DCO (Document Ref: 3.1)** and represents an enhancement of the existing situation.
5.23	**Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (2016) (LMWLP)** The relevant policies are: • **Policy DM1: Presumption in favour of sustainable development** – Reason: the County Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. • **Policy DM4: Historic Environment** – Reason: potential archaeological interest. • **Policy DM12: Best and Most Versatile Agricultural Land** – Reason: development proposals that involve significant amounts of	Appendix 4D of the **PS (APP-277)** assesses the Proposed Development against the Lincolnshire Minerals and Waste Local Plan, outlining the Proposed Development's accordance with this policy document. The only LMWLP policy which was agreed with LCC to be of relevance in the Pre-Application period, as set out in the **Statement of Common Ground with Lincolnshire County Council (REP1-016)**, were M11 and M12. Nevertheless, those listed here are considered below: Policy DM1 refers to the 'presumption in favour of sustainable development' contained in the NPPF, stating that they aim to secure development that improves the economic, social and environmental conditions in the area. We have shown to

BMV agricultural land will only be permitted where the stated criteria are met.

- **Policy M11: Safeguarding of Mineral Resources** – Reason: part of the Beacon Fen site intersects a Sand and Gravel Minerals Safeguarding Area (MSA).
- **Policy W1: Future Requirements for New waste Facilities.**

accord with the NPPF within Appendix 4A of the **PS (APP-277)**. The **ES (APP-050 to APP-070)** outlines how the economic, social and environmental conditions of the Proposed Development have been assessed, with **ES Appendix 2.3 Embedded Mitigation (APP-076)** outlining the measures in place to ensure that the Proposed Development accords with these conditions. Therefore the Proposed Development is shown to accords with this policy.

Policy DM4 refers to the Historic Environment and specifically potential archaeological interest. This policy states that proposals that have the potential to affect heritage assets should be accompanied by an assessment of the assets and potential impacts of the proposed development. This has been assessed within **ES Chapter 8 Cultural Heritage (APP-059)** and is supported by the **ES Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. Mitigation outlined in **ES Appendix 2.3 Embedded Mitigation (APP-076)** outlines the mitigating measures to be implemented in order to address any impacts upon the identified heritage assets. These relevant assessments and mitigation demonstrate accordance with this policy.

Policy DM12 refers to Best and Most Versatile ('BMV') Agricultural Land. The effects of the Proposed Development on BMV land is assessed within the **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) (REP1-013 to REP1-014)** details the measures to mitigate impacts to the soil. Policy DM12 states that development that includes significant area of BMV

		agricultural land will only be permitted where it can demonstrate that there are no reasonable alternatives and that the site will be restored to an after-use that safeguards the long-term potential of the BMV land. The Appendix 2 Site Selection Report of the **PS (APP-277)** assesses alternative sites within a 10km radius of the substation and takes into account BMV land. Once all the relevant tests had been applied, no alternative sites were identified for the Proposed Development. **ES Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)** outlines how following the 40 year lifetime of the Proposed Development, the land will be returned to its existing use. These relevant assessments demonstrate accordance with this policy.
5.24	**Lincolnshire County Council Energy Infrastructure Position Statement (December 2023)** The Council's Energy Infrastructure Position Statement notes that NSIP's cover a range of potential developments including solar farms and cable routes.	This comment is noted.
5.25	All new energy sources need to be connected to the grid and this creates risk. The Council's position is that any cabling required should be underground unless connecting to an existing overhead line.	The **Electricity Grid Connection Statement (APP-285)** outlines that the connection to the Bicker Fen Substation will be connected to the Onsite substation via a 400kV underground Cable Route.
5.26	The statement notes the advice contained in the NPPF that local planning authorities should consider the economic and other benefits of BMV agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should require the use of areas of poorer quality land in preference to that of higher quality. Based on this the	The Applicant has set out in response to ExQ1 LUS.1.1 **(Applicant's Responses to the ExAs ExQ1, Document Ref. 9.6)** submitted alongside this document at Deadline 2, how it has sought to minimise development on best and most versatile (grades 1, 2, and 3a) land.

	Council will object to development on Grade 1, 2 and 3a land.	
5.27	In considering NSIP proposals the protection of BMV agricultural land is the starting point for the Council for projects that involve significant land take. This principle will be cross referenced with other topics of consideration such as local environment, landscape, historic and community impacts to come to a view if there is any justification to override the loss of agricultural land.	**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. Appendix 2 Site Selection Report of the **PS (APP-277)** considers BMV land as well as other factors within the analysis of potential alternative sites, however no alternative sites with lower quality agricultural land were identified. There will be a temporary loss in agricultural production during the life of the project; however, the agricultural potential will be retained, with the site being returned to its existing state as outlined within the **ES Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)**.
5.28	Finally, consideration should be given to the cumulative impact from proposals in combination for significant impact of numerous developments clustered within the same locality in a similar time period.	Consideration of potential cumulative impacts is considered within the **ES Chapters 6 to 16 (APP-057 to APP-067)** and summarised within **ES Chapter 18 Cumulative Effects (APP-069)**.
5.29	**North Kesteven Climate Emergency Strategy and Action Plan, 2020 (updated 2022)** This strategy outlines North Kesteven District Council's strategy to reach net zero emissions by 2030.	The Proposed Development accords with the North Kesteven Climate Emergency Strategy and Action Plan with the Proposed Development design which aims to deliver a large amount of renewable and low carbon electricity using solar PV arrays. **ES Chapter 12 Climate Change (APP-063)** has identified the action plan as an applicable national policy within paragraph 12.2.4.

5.30	**North Kesteven Strategic Flood Risk Assessment – 2009 Revision Report** The SFRA has assessed the flood risk issues at a strategic scale to inform the spatial planning process.	Flood Risk is assessed within **ES Chapter 11 Water Resources and Flood Risk (APP-062)** and is supported by the **ES Appendix 11.1 Flood Risk Assessment (APP-162)** which within section 5.2, takes into account the North Kesteven Strategic Flood Risk Assessment and outlines how it does not show any flooding incidents in the vicinity of the Solar Array Area, with the closest area shown to be affected being land to the west of Sleaford in 1977. The Cable Route Corridor and the Bespoke Access Corridor are also shown to not extend through any areas affected by historical flooding incidents. Mitigation for Flood Risk is also outlined in **ES Appendix 2.3 Embedded Mitigation (APP-076)** which is secured by the **Draft DCO (Document Ref: 3.1)**.
6	**Assessment of Impact and Adequacy of Response**	
6.1	The Beacon Fen Energy Park proposal aims to contribute to renewable energy generation, with a capacity of 400MW. This aligns with the objectives of the NPS's and key national government commitments. While the project has the potential to deliver positive outcomes through the production of clean, renewable energy, support for the scheme is contingent upon demonstrating that any significant adverse environmental impacts can be effectively managed or mitigated through the DCO process.	The Applicant notes this comment. Mitigation, enhancement and compensation are outlined in the **Environmental Statement ('ES') (APP-050 to APP-069)** with mitigation measures summarised within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)**).
6.2	The sections below consider the potential impacts of the development on other factors/topics. The Examining Authority (ExA) will need to balance positive impacts against the negative impacts identified within this LIR and those raised by other host authorities and Interested Parties.	The Applicant has noted this. Section 6 and Section 7 of the **PS (APP-277)** assess the planning balance of the Proposed Development, taking into account the positive and negative impacts of the Proposed Development.

6.3	The following sections identify, for each topic heading listed below, key statements from national planning policy, the relevant local planning policies, the key issues and impacts raised by the proposed development and the extent to which the applicant has addressed these issues in the application documents: • Landscape and Visual • Ecology • Cultural Heritage • Access and Traffic • Water Resources and Flood Risk • Soils and Agricultural Land • Socio-Economics (including Public Rights of Way) • Human Health • Minerals and Waste • Fire Safety • Cumulative Effects • Other topics • Draft Development Consent Order	The identified topics have been assessed within the **ES (APP-050 to APP-070)** and the specific points raised in LCCs LIR are addressed within the remainder of this document.
7	**Landscape and Visual**	
7.1	NPS EN-1 at paragraph 5.10.37 states that the SoS should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	**Chapter 3 Alternatives and Design Evolution (APP-054)** of the Environmental Statement (ES) sets out the approach to siting of the Proposed Development and how the scheme design has evolved in response to environmental and operational constraints. This process has included the removal of the Beacon Fen South element; a secondary panel array initially proposed as part of the scheme, reducing the overall scale of development and the potential for significant

cumulative landscape and visual effects. The alignment of the Cable Route Corridor has been selected following an options appraisal which was influenced by the requirement to minimise impacts key environmental constraints and avoid where possible. The chosen route was considered to be preferable in terms of minimising impacts to key receptors, including residents in adjacent settlements. Additionally, there is a commitment to the use of trenchless methods to install the cable such as Horizontal Directional Drilling (HDD) at sensitive locations including the South Forty Foot Drain, Heckington Eau and the Hodge Dike, allowing for the retention of existing vegetation which will be particularly notable at South Forty Foot Drain as illustrated in **Figure 6.32c Vegetation Removal Plan (APP-238)**. An options appraisal was also undertaken in relation to the routing of the Bespoke Access Corridor. Environmental factors were an important factor in the selection of the chosen route, particularly the need to avoiding crossing major water courses including the Car Dyke, the River Slea and Heckington Eau, which is classified as an EA Main River.

The layout of the Solar Array Area has been designed around the retention of the existing field pattern and associated boundary features, including hedgerows to the Site perimeter, reducing the requirement for vegetation removal and adverse impacts on landscape pattern. To supplement the presence of retained vegetation, landscape mitigation measures are proposed and illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**. These are described within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)** plus **Appendix 6.7 Outline Landscape and Ecological Environmental Management Plan (oLEMP)**, secured via

		Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**. The aim of the strategy is to facilitate integration of the Proposed Development into the landscape context through the retention of existing mature vegetation including hedgerows, individual trees, scrub and woodland combined together with proposed measures to provide further landscape and visual mitigation. These measures include the introduction of native shrub belts with trees to mitigate visual impacts. Specific measures, will include strengthening the boundary, perimeter planting to the Solar Array Area through infilling gaps and the introduction of native shrub belts with trees for specific receptors. These include residential properties adjacent to the Solar Array Area and to the west of the centrally located Onsite Substation and Battery Energy Storage System (BESS) compound to provide screening of for visual receptors to the west, including those at Ewerby and Ewerby Thorpe. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.2	Paragraph 5.10.35 of EN-1 states that the 'scale of energy projects means that they will often be visible across a very wide area'. It goes on to stress that the SoS 'should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'. Paragraph 5.10.36 then sets out that the SoS should 'consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being	**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports the predicted level of landscape and visual effects at construction, operation and decommissioning within the defined LVIA Study Area (as defined under 'Extent of Study Area' within Section 6.4 Assessment Methodology & Significance Criteria of Chapter 6). During construction, it has been found that temporary significant visual effects will be experienced within the Solar Array Area, Cable Route Corridor and Bespoke Access Corridor up to a maximum distance of 500m from the DCO

	reversed in a timescale that the Secretary of State considers reasonable'.	Order Limits. These effects would be short term. Overall, it has been found that, following cessation of construction activity, the geographical influence and extent of visibility resulting from the Proposed Development will be limited and will not have a strong visual influence beyond the immediate context of the Site. Accordingly, at operation, a relatively restricted number of receptors will experience significant effects including some residents in individual properties adjacent to the Site boundary and users of the Public Rights of Way (PRoW) and transport network. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.3	Paragraph 5.10.5 of EN-1 states that 'virtual all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation'.	The Applicant acknowledges that there is a degree of unavoidable landscape effects that would arise with the Proposed Development after the application of mitigation, but also beneficial landscape character effects from some of the mitigation proposals. This is common to many energy NSIPs, as policy acknowledges. **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports that there would be Significant adverse effects on the Fenland Sub Area and the Holland Reclaimed Landscape Character Area (LCA) at construction as a result of works associated with the Solar Array Area and within the Cable Route Corridor. At operation Year 0, there would be Significant adverse effects on the Fenland Sub Area because of the presence of the Solar Array Area within this landscape unit. Following establishment of mitigation planting, at year 15, effects on the Fenland Sub Area will remain adverse but will reduce to Not Significant levels.

		The landscape mitigation measures proposed in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and secured through **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (in turn secured via Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) will provide landscape and biodiversity enhancements. Specifically, improved connectivity will be provided through the introduction of linear belts of native shrubs with trees and native species rich hedgerows providing linkages between existing isolated plantations and other areas of retained vegetation. Additional planting will also be introduced to close gaps in existing hedgerows helping to strengthen the perimeter planting and enclosure of the Solar Array Area. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.4	Paragraph 5.10.6 then goes on to state that 'projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate'.	The layout of the Solar Array Area has been designed around the retention of the existing field pattern and associated boundary features including hedgerows to the Site perimeter reducing the requirement for vegetation removal and adverse impacts on landscape pattern. To supplement the presence of retained vegetation, proposed landscape mitigation measures are proposed and illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**. These are described within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)** plus **Appendix 6.7 Outline Landscape and Ecological Environmental Management Plan (oLEMP)**, secured via

		Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**. The aim of the strategy is to facilitate integration of the Proposed Development into the landscape context through the retention of existing mature vegetation, including hedgerows, individual trees, scrub and woodland combined together with proposed measures to provide further landscape and visual mitigation. These measures include the introduction of native shrub belts with trees to mitigate visual impacts. Specific measures will include strengthening the boundary, perimeter planting to the Solar Array Area through infilling gaps and the introduction of the introduction of native shrub belts with trees for specific receptors. These include residential properties adjacent to the Solar Array Area and to the west of the centrally located Onsite Substation and Battery Energy Storage System (BESS) compound to provide screening of for visual receptors to the west, including those at Ewerby and Ewerby Thorpe. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.5	The specific guidance relating to Solar Photovoltaic Generation in section 2.10 of EN-3 at paragraph 2.10.94 notes that 'Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure'. Paragraph 2.10.95 states that '*whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and*	**Figure 6.1 Bareground Zone of Theoretical Visibility (APP-204)** and **Figure 6.2 Screened Zone of Theoretical Visibility with Viewpoints (APP-205)** provide an indication of theoretical visibility based on the maximum development parameters at operation of the Solar Array Area and the Bicker Fen Substation extension across the LVIA Study Area (as detailed under 'Extent of Study Area' within Section 6.4 Assessment Methodology & Significance Criteria of **Chapter 6 Landscape and Visual (APP-057)**). Although the ZTVs illustrate reasonably extensive visibility across parts of the

	appropriate land topography, the area of a zone of visual influence could be appropriately minimised.'	Study Area, the LVIA (i.e. **Chapter 6**) reports that the Proposed Development will have a limited visual influence beyond the immediate context of the Proposed Development. This is because of the relatively low height of the solar panels (up to 3.5m and 3.9m), the visual containment provided by retained and ultimately proposed vegetation, which will be managed to a height of 3.5m. The relatively flat nature of the Site and layers of vegetation cover in the wider landscape will also contribute towards limited visual prominence as perceived from the wider landscape. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.6	Local Policies: • CLLP Policy 1: The Spatial Strategy and Settlement Hierarchy • CLLP Policy S5: Development in the Countryside • CLLP Policy S14: Renewable Energy • CLLP Policy S53: Design and Amenity • CLLP Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value • CLLP Policy S66: Trees, Woodland and Hedgerows • SELLP Policy 3: Design of New Development • SELLP Policy 31: Climate Change and Renewable and Low Carbon Energy	Appendix 4B of the **PS (APP-277)** assesses the policies from the CLLP and outlines how the Proposed Development is in accordance with the policies listed, but does not consider Policy S62 which is not of relevance to the Proposed Development given its distance from these designations. Policy S62: Area of Outstanding Natural Beauty and Areas of great Landscape Value was not assessed within the **PS (APP-277)** due to there being no Areas of Outstanding Natural Beauty of Areas of Great Landscape Value within close proximity to the Site. For this reason, this policy was not included in the list of relevant local development plan policy which was shared and agreed with LCC in the Pre-Application period, as set out in the **Statement of Common Ground with Lincolnshire County Council (REP1-016)**. Appendix 4C of the **PS (APP-277)** assesses the policies from the SELLP and outlines how the Proposed Development is in accordance with the policies listed.

7.7	CLLP Policy 1 (The Spatial Strategy and Settlement Hierarchy) focuses on delivering sustainable growth for Central Lincolnshire to meet the needs for homes and jobs, regenerates places and communities, and supports necessary improvements to facilities, services and infrastructure. Development regarded as being in the countryside (unless supported by other policy) is restricted to agricultural, infrastructure renewable energy or minerals and waste.	Appendix 4B of the **PS (APP-277)** outlines how the Proposed Development accords with this policy. It outlines how the location of the Proposed Development in the countryside is justified due to the nature of solar farms requiring cleared land with generally flat topography, good solar irradiance and limited tree cover/field boundaries, in sufficient proximity of the connection point to the national grid, as outlined in **Appendix 2: Site Selection Report** of the **PS (APP-277)**. The Proposed Development's delivery of the substantial renewable energy generation and contribution to meeting the established urgent need for renewable energy generation infrastructure provides further justification for the land use.
7.8	CLLP Policy S5(Development in the Countryside) - Part E: Non-residential development in the countryside supports non-residential development providing that it does not result in conflict with neighbouring uses and is of a size and scale commensurate with the proposed use and with the rural character of the location. Part F: Agricultural Diversification – supports farm based diversification to non-agricultural activities or operations providing it supports the farm enterprise and is in an appropriate location and scale with regard to the location of business need.	Appendix 4B of the **PS (APP-277)** outlines how the Proposed Development accords with Part E of this policy. It outlines how the location of the Proposed Development in the countryside is justified due to the nature of solar farms requiring cleared land with generally flat topography, good solar irradiance and limited tree cover/field boundaries, in sufficient proximity of the connection point to the national grid, as outlined in **Appendix 2: Site Selection Report** of the **PS (APP-277)**. The Proposed Development's delivery of substantial renewable energy generation and contribution to meeting the established urgent need for renewable energy generation infrastructure provides further justification for the land use. Part F of this policy was not assessed within Appendix 4B, however the Proposed Development accords with this policy with the location of the development being shown to be appropriate in Appendix 2 Site Selection Report of the **PS (APP-277)**, with it being in the vicinity of the point of connection. The Proposed Development is also of appropriate

scale for the location and the scale of the Proposed Development is also appropriate to the business need.

The local policy here is generally supportive of agricultural diversification and as such the Proposed Development accords with this since it provides alternative revenues to the farmholding and has avoided and minimised wider impacts through landscaping and good design and the incorporation of traffic and flood risk management and mitigation. However, the local policy sets criteria that contemplate small, local scale diversification projects, whereas the project has national benefits and is of a scale that delivers benefits at the national scale given its NSIP status. As such there may be a partial conflict with local policy in relation to the Proposed Development and NPS EN-1 4.1.15 says 'in the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure'. In light of the above, it is not considered necessary to demonstrate accordance with Part F of CLLP Policy 5, and would refer to our policy compliance with regards to land use in NPS EN-1 and EN-3.

Chapter 6 Landscape and Visual (APP-057) of the Environmental Statement (ES) reports that there would be residual Significant adverse landscape effects for the Site's surrounding area, but that the visual and characterising influence of the Proposed Development would not extend widely beyond the extent of the Order Limits. As such there would be no residual significant effects on the landscape character of the host Fenland Sub Area. Effects in relation to visual amenity would be limited to a small number of receptors in close proximity to the Solar Array Area and Bespoke Access

		Road. The LVIA (**Chapter 6 Landscape and Visual**) has found that there would be no significant cumulative landscape or visual effects.
7.9	CLLP Policy S14 (Renewable Energy) supports proposals for renewable energy schemes subject to the direct, indirect, individual and cumulative impacts of development on, amongst other things, landscape character and visual amenity being acceptable or capable of being made acceptable.	Appendix 4B of the **PS (APP-277)** outlines how the Proposed Development accords with this policy. It outlines how **ES Chapters 6 to 18 (APP-057 to APP-069)** assess any direct, indirect, individual and cumulative impacts of the Proposed Development on landscape and visual, ecology, cultural heritage and archaeology, access and traffic, noise and vibration, water resources, climate change, glint and glare, soils and agricultural land, socio-economics and air quality, as well as other environmental topics including waste, health and electromagnetic fields. **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports that the Proposed Development would result in Significant adverse landscape and visual effects within the Site and immediate landscape context up to a distance of ~500m from the Order Limits. This represents a relatively contained geographical area. The LVIA (i.e. **Chapter 6**) has found that there would be no significant cumulative landscape or visual effects.
7.10	CLLP Policy S53 (Design and Amenity) expects all development to achieve high quality sustainable design which contributes positively to the local character and landscape. Development proposals should, amongst other things, be based on a sound understanding of the context, integrate into the surrounding, relate well to the site, protect any important local views into, out of or through the site, reflect the identity of area and contribute to the sense of place and maintain landscape quality and minimise	Landscape and ecological enhancements have been informed by landscape character studies at a local and national level including, reference documents such as National Character Area Profile 46 – The Fens (Natural England). This appreciation of landscape context has informed the development of the landscape strategy **(Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235))** 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 this

	adverse visual impacts through high quality building and landscape design.	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. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.11	CLLP Policy S62 (Area of Outstanding Natural Beauty and Areas of Great Landscape Value). Areas of Great Landscape Value (AGLV) are locally designated landscape areas recognised for their intrinsic character and beauty and their natural, historic and cultural importance. Development proposals within, or within the setting of, AGLV shall seek to conserve, protect and enhance (where possible) the quality and distinctiveness of locally important landscapes, wildlife and historic features.	There are no national or locally (AGLV) designated landscapes within the 5km (LVIA) Study Area and, therefore, the Proposed Development does not fall within, or within the setting of, a designated landscape and will not, therefore, adversely affect such landscapes. However, the landscape mitigation measures proposed in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and secured through **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (in turn secured via Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) have been designed to relate to the prevailing landscape character of the Site and wider landscape context. Specifically, the landscape design seeks to provide a balance between mitigating adverse visual effects and assimilating the energy infrastructure whilst maintaining a characteristic sense of openness. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

7.12	CLLP Policy S66 (Trees, Woodland and Hedgerows) states that planning permission will only be granted if the proposal provides evidence that it has been subject to adequate consideration of the impact of the development on any existing trees and woodland found on-site. Proposals for new development will also be expected to retain existing hedgerows where appropriate and integrate them fully into the design, having regard to their management requirements.	The impacts of the Proposed Development on trees, woodland and hedgerows are considered in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)**. Paragraph 6.14 of **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** (secured by requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) includes the provision for BS 5837 compliant Arboricultural Method Statements and Tree Protection Plans to be prepared at the detailed design stage. These will include details for the protection of retained trees, woodlands and hedgerows and will be completed for the Bespoke Access Corridor, Solar Array Area and Cable Route Corridor. Existing hedgerows have been retained and incorporated into the design, where feasible. A Statement of Common Ground has been agreed with the Forestry Commission (with all matters agreed) and is to be submitted at Deadline 2. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
7.13	SELLP Policy 3 (Design of New Development) states that development proposals will be required to demonstrate, where relevant, how the landscape character of the location will be secured. Design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of the area, will not be acceptable.	In order to minimise direct effects on landscape character, the layout of the Solar Array Area has been designed around the retention of the existing field pattern and associated boundary features, including hedgerows to the Site perimeter, reducing the requirement for vegetation removal and adverse impacts on landscape pattern. Landscape mitigation measures to supplement the presence of retained vegetation are proposed and illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**. The aim of the strategy is to facilitate integration of the Proposed Development into the prevailing landscape context through

the retention of existing mature vegetation including hedgerows, individual trees, scrub and woodland combined together with proposed measures to provide further landscape and visual mitigation. Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures proposed.

The precise alignment of the Cable Route and the Bespoke Access Road are not yet known, and the final routing has been assumed to be anywhere within their respective Corridor boundary to represent a worst-case scenario. The Bespoke Access Corridor has been informed by the requirement to minimise landscape impacts by, where possible, routing the road to the edge of field boundaries and utilising existing gaps in hedgerows to minimise disruption to landscape pattern. In relation to the Cable Corridor , existing vegetation will be retained through the use of trenchless methods to install the cable such as Horizontal Directional Drilling (HDD) at sensitive sites, including the South Forty Foot Drain, Heckington Eau and the Hodge Dike. **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)**, secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1)**, sets out the commitment to reinstate vegetation within the Cable Route Corridor following the construction phase subject to easement restrictions and within the Bespoke Access Corridor following decommissioning.

The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

7.14	SELLP Policy 31 (Climate Change and Renewable and Low Carbon Energy) states that development of renewable energy facilities and associated infrastructure will be permitted provided, individually, or cumulatively, there would be no significant harm to visual amenity and landscape character or quality. Provision should be made for post-construction monitoring, and the removal of the facility and reinstatement of the site if the development ceases to be operational.	Appendix 4C of the **PS (APP-277)** outlines how the Proposed Development accords with SELLP Policy 31. It outlines how, as set out in the **Environmental Statement (ES) (APP-050 to APP-070)** and the **Design and Access Approach Document (AS-019)**, the Proposed Development has been designed in a manner that seeks to meet the current need for energy infrastructure, minimise impacts and maximise benefits to the environment and mitigate the impacts of climate change. **ES Chapters 6** to **16 (APP-057 to APP-067)** demonstrate that with the embedded mitigation measures and implementation of the proposed additional mitigation measures, the Proposed Development would not result in significant harm to the features outlined in criteria B1-7 of this policy. **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports that there would be residual Significant adverse landscape effects for the Solar Array Area of the Site**.** However, following establishment of mitigation planting, as illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and secured through **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1)**), the visual and characterising influence of the Proposed Development would not extend widely beyond the extent of the Order Limits. As such, there would be no residual significant effects on the landscape character of the host Fenland Sub Area. Effects in relation to visual amenity would be limited to a small number of receptors in close proximity to the Solar Array Area of the Site. The LVIA (i.e. **Chapter 6 Landscape and Visual**) reports that there would be no significant cumulative landscape or visual effects. The

		requirements for monitoring are set out in Paragraphs 2.6.43 to 2.6.46 of the oLEMP.
7.15	The Council commissioned AAH Landscape Consultants to assist in the consideration and review of the landscape and visual elements of the Beacon Fen proposal and have engaged and provided feedback and advice to the Applicant's design team on behalf of the Council throughout the pre-application stage. A full copy of the report prepared by AAH is attached as Appendix 1 which has reviewed the DCO application documentation, and the following summary and conclusions is based on those comments and should be read in conjunction with the full document.	The Applicant has reviewed the contents of the AAH report, as summarised in the LIR report and has provided narrative in relation to aspects of this report in points 7.18 to 7.20 of this response document. The Applicant has also contacted Lincolnshire County Council (LCC), along with North Kesteven District Council (NKDC) and AAH to propose further engagement regarding the contents of the AAH report, to identify key issues and information requirements and to look to resolve these matters over the course of the examination.
7.16	The AAH consultant's report provides an overall summary and conclusion on the suitability of the Landscape and Visual elements of the DCO Application and whether they are sufficient to support an informed decision. This includes the adequacy of the LVIA, which has been reviewed in accordance with the Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs). Finally, there are recommendations for further information that should be provided to assist in the examination of the DCO Application.	The Applicant has reviewed the contents of the AAH report and has provided narrative in relation to aspects of this report in points 7.18 to 7.20 of this response document. has contacted Lincolnshire County Council (LCC), along with North Kesteven District Council (NKDC) and AAH to propose further engagement regarding the contents of the AAH report, to identify key issues and information requirements and to look to resolve these matters over the course of the examination.
7.17	The LVIA and associated figures, appendices and documents provide a generally comprehensive assessment of the Development, with an appropriate level of detail for a scheme of this scale and context. The assessment process is relatively well presented, with baseline conditions and predicted effects set out in a structured way. Significant	has contacted Lincolnshire County Council (LCC), along with North Kesteven District Council (NKDC) and AAH to propose further engagement at which point any requirements for further clarity or additional work can be agreed.

	effects on both landscape character and visual amenity are identified; however, there are several areas where further clarity or additional work is considered necessary.	
7.18	By virtue of its scale and massing, the Development would result in Significant adverse effects on local landscape character and visual amenity during all key phases (construction, early operation, and at year 15). The proposals would fundamentally alter the character of the site and its surroundings, replacing open, agricultural fields with extensive solar infrastructure. This represents a substantial and long-term change to the openness, tranquillity, and rural character of the area. Whilst the LVIA categorises residual effects as partially reversible, we consider that, given the likely operational lifespan and scale, the change should be regarded as effectively permanent in landscape and visual terms.	**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports that there would be Significant adverse effects on the Fenland Sub Area and the Holland Reclaimed Landscape Character Area (LCA) at the construction phase as a result of works associated with the Solar Array Area and within the Cable Route Corridor. It is agreed that the Proposed Development would fundamentally alter the character of the Solar Array Site area due to the introduction of energy infrastructure within a predominantly agricultural landscape. Effects in relation to landscape elements will be more limited because of the retention of field pattern and associated boundary features and areas of existing vegetation. More widely, the characterising influence of the Proposed Development will be restricted by the retention of perimeter vegetation, proposed supplementary planting and hedgerow management measures which will allow hedgerows to be maintained at a height of up to 3.5m to provide more effective screening. Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the landscape mitigation measures. Additional reference may be made to **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)**, secured via Requirement 7 of

		the **Draft DCO**, and **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235).**
7.19	Significant adverse visual effects are also predicted for a range of receptors, due to the transformation from rural agricultural views to those containing large-scale solar arrays. We have highlighted some issues with the visual assessment within the LVIA and compliance with the recent Landscape Institute Technical Guidance Note LITGN-2024-01, and we also have concerns that the mitigation planting itself could generate adverse visual effects though blocking or foreshortening views and appearing out of context.	The LVIA (i.e. **Chapter 6 Landscape and Visual (APP-057)**) has assessed effects associated with the Solar Array Area as long term and partially reversible on the basis that the operation phase of the Proposed Development is anticipated to be for a period of 40 years. After this period the Solar Array Area will be reinstated to a scenario comparable to the baseline because the existing field pattern, associated drainage ditches and vegetation boundary features will be retained, linked with new mitigation planting and integrated into the scheme design. Therefore, it is considered reasonable to base the assessment on a partially reversible scenario.
7.20	Cumulative landscape and visual effects with other renewable energy and infrastructure projects across the county present a further concern. Whilst the immediate cumulative schemes within the ES are relatively modest, the scale of other NSIP's and large-scale energy projects proposed in the wider area raises the potential for extensive alteration of the regional landscape character. The combined effect of these developments could be a marked an enduring change, both directly through a change in land use and introduction of solar as a key element, and also in the perception and experience of the landscape, particularly for visual receptors travelling through the landscape and experiencing sequential effects. This is a clear and marked change to landscape character.	Adhering to the scope included within **Chapter 4 Scope and Methodology (APP-055)** of the Environmental Statement (ES) and utilising Appendix 4.2 2 Cumulative Assessment Short List (APP-082), **Chapter 6 Landscape and Visual (APP-057)** and **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 (see Section 6.4 within **Chapter 6 Landscape and Visual**). In relation to the other developments considered within the LVIA, it has been found that there will be no significant cumulative landscape or visual effects. More widely, 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. These schemes are all located well beyond the extent of the LVIA Study Area and as such have not been considered in the LVIA and have limited potential to result in significant visual effects in association with views of the Proposed Development through any possible sequential visual experience because of the considerable geographical separation.
7.21	Tree and vegetation removal associated with the Development, including wider highways improvements and access for construction, must be clarified through the examination process, and subsequently any works (such as lopping or pruning), or removal of trees and hedgerows must be agreed prior to any works commencing. Prior to any construction activities, all tree and hedgerow protection methods associated with that phase of construction should also be clarified and subsequently agreed with the appropriate authority (in this case the local planning authority). This would be to BS:5837 Trees in Relation to Construction and any subsequent arboriculture method statements, again this should be approved by the appropriate authority. In particular this should ensure existing trees, and associated root protection areas, are suitably protected throughout the entire construction period. This would also likely include areas within the order limits, but away from construction activity, such as storage areas for materials which may suffer from tracking by plant that would damage tree root protection zones.	Proposed tree and hedgerow removals for the Bespoke Access Corridor and Solar Array Area are detailed in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)**. See also **Figure 6.32 Vegetation Removal Plan (APP-236 to APP-238)**. Paragraph 6.14 of **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** (secured by requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) includes the provision for BS 5837 compliant Arboricultural Method Statements and Tree Protection Plans to be prepared at the detailed design stage. These will include details for the protection of all retained trees, woodlands and hedgerows and will be completed for the Bespoke Access Corridor, Solar Array Area and Cable Route Corridor.

7.22	While the submission includes landscape proposals (as shown on Figure 6.31: Landscape Strategy Plan, secured via Work Order 9 on the Works Plans and DCO) (APP-010), these are of a high level and it would be expected that if the project proceeds much more detailed plans would need to be submitted and subsequently agreed with the appropriate authority prior to the commencement of any works and secured through Requirements of the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification. The mitigation illustrated on the layout plans has been utilised to assess the landscape and visual effects of the scheme; therefore, we would expect any detailed landscape proposals to consist of the area and extent shown on these plans as a minimum.	The landscape proposals illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** are intended to provide a sufficient level of detail at this stage to demonstrate the range of proposed landscape elements, how they relate to existing landscape features and the Proposed Development layout. It is recognised that further details will be required and a commitment to provide this further detail and how it is secured is described in **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)**, (via delivery of the detailed LEMP(s) as secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1).** The detailed LEMP(s) will be subject to local planning authority approval.
7.23	Therefore, the Council concludes that the proposed development would have **negative** landscape and visual impacts.	**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports the level of landscape and visual effects resulting from the Proposed Development. In accordance with good practice, the LVIA has assessed landscape and visual effects for individual receptors identified in the baseline rather than considering the general concept of landscape and visual impacts as being either 'negative' or 'positive'.
8	**Ecology**	
8.1	Section 5.4 of NPS EN-1 covers biodiversity and geological conservation. The government's policy for biodiversity in England is set out in the Environmental Improvement Plan 2023, the National Pollinator Strategy and the UK Marine Strategy. The aim is to halt overall biodiversity loss in	Section 5.4 of NPS EN-1 has been taken into account in **Chapter 7 Ecology** (**APP-058**) of the Environmental Statement (ES) and within the **Biodiversity Net Gain Strategy (APP-280)** (secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1)**). Where possible and

	England by 2030 and then reverse loss by 2042, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to address this challenge will result in significant adverse impacts on biodiversity and the ecosystem services it provides (paragraph 5.4.2).	practicable, opportunities to enhance biodiversity by creating new habitats and strengthening ecological connectivity have been included. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.2	Paragraph 5.4.39 states that the SoS 'should have regard to the aims and goals of the government's Environmental Improvement Plan 2023 and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere'. Paragraph 5.4.41 goes on to state that 'the benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The SoS may take account of any such net benefit in cases where it can be demonstrated'. Paragraph 5.4.43 states 'If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the SoS will give significant weight to any residual harm'.	The Environment Improvement Plan 2023 and Environment Act 2021 have been taken into account within **Chapter 7 Ecology (APP-058)** Environmental Statement (ES) and within the extensive habitat proposals pursuant to the Appendix 6.7 **Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)**, which strengthens green and blue corridors through the site Solar Array Area and into the wider landscape and also delivers significant Biodiversity Net Gain. The oLEMP is secured through implementation of a LEMP as per Requirement 7 in Schedule 2 to the **Draft DCO (APP-038)** and the **Biodiversity Net Gain Strategy (APP-280)** is secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1)**. Impacts on ecological receptors have been considered and the mitigation hierarchy applied to first avoid then minimise impacts and final where impact remain to compensate for these. Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures (secured by the **Draft DCO (Document Ref: 3.1)**) to be implemented. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

8.3	Paragraph 5.4.46 advises that development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design and the SoS should give appropriate weight to environmental and biodiversity enhancements, but any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	The design of the Proposed Development has incorporated biodiversity enhancements where possible and practicable. These enhancements are included within the **Biodiversity Net Gain Strategy (APP-280),** secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1).** The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.4	Local Policies: • CLLP Policy S14: Renewable Energy • CLLP Policy S59: Green and Blue Infrastructure Network • CLLP Policy S60: Protecting Biodiversity and Geodiversity • CLLP Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains • CLLP Policy S66: Trees, Woodland and Hedgerows • SELLP Policy 3: Design of New Development • SELLP Policy 28: The Natural Environment	The Applicant has noted these policies and they are incorporated into the relevant chapters of the Environmental Statement (ES) as set out in the responses provided, below. The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
8.5	CLLP Policy S14 (Renewable Energy) states that the proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts are, or will be made, acceptable, including in relation to biodiversity and geodiversity considerations.	Potential impacts on biodiversity have been considered within Sections 7.6 and 7.8 of **Chapter 7 Ecology** (**APP-058**) Environmental Statement (ES), with mitigation for any significant adverse impacts detailed in Sections 7.6. and 7.7 of **Chapter 7**. The mitigation is secured in **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)**, secured pursuant to Requirement 12 of the **Draft DCO (Document Ref: 3.1).** Supplementary to the above, Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant**

		Environmental Effects (APP-070) and **Appendix 2.3 Embedded Mitigation (APP-076)**) also detail the mitigation measures (secured by the **Draft DCO**) to be implemented. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.6	CLLP Policy S59 (Green and Blue Infrastructure Network) states that the Central Lincolnshire Authorities will safeguard green and blue infrastructure from inappropriate development and work actively with partners to maintain and improve the quantity, quality, accessibility and management of the green infrastructure network. This policy also notes that proposals that cause loss or harm to the green and blue infrastructure will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts. Where adverse impacts on green infrastructure are unavoidable, development will only be supported if suitable mitigation measures for the network are provided.	The Applicant has developed **Figure 6.32 Landscape Strategy Plan (APP-233** to **APP-235**) based on enhancements to the green and blue infrastructure, including hedgerow enhancement, buffers along watercourses and creation of wildflower meadows. This is intended to strengthen ecological connectivity throughout and offsite. These enhancements are secured in **Appendix 6.7 outline Landscape and Ecological Landscape Plan (oLEMP) (APP-089)**, secured pursuant to Requirement 7 of the Draft DCO **(Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.7	Policy S60 (Protecting Biodiversity and Geodiversity) states that development proposals will be considered in the context of the relevant Local Authority's duty to promote the protection and recovery of priority species and habitats. Where adverse impacts are likely, development will only be supported where the need for and benefits of the development clearly outweigh these impacts. In such cases, appropriate mitigation or compensatory measures will be required.	Impacts on biodiversity have been considered in Sections 7.6 and 7.8 of **Chapter 7 Ecology** (**APP-058**) Environmental Statement (ES), with mitigation for these impacts incorporated in Sections 7.6. and 7.7 of the **Chapter 7**. In each case, the mitigation hierarchy (avoidance and minimisation of impacts followed by compensation as a last resort) has been applied. The mitigation is secured in **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010),** secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1).** These are also illustrated on **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and further detailed within Section 19.2 Additional Mitigation of **Chapter 19**

		Summary of Significant Environmental Effects (APP-070) and **Appendix 2.3 Embedded Mitigation (APP-076)**) (secured by the **Draft DCO**). The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.8	Development will only be supported where the proposed measures for mitigation and/or compensation, along with details of net gain, are acceptable. All development should: • Protect, manage, enhance and extend the ecological network of habitats, species and sites of international, national and local importance (statutory and non-statutory); • Minimise impacts on biodiversity and features of geodiversity value; • Deliver measurable and proportionate net gains in biodiversity in accordance with policy S61; and Protect and enhance the aquatic environment within or adjoining the site, including water quality and habitat.	The Proposed Development design has been built up incorporating biodiversity where feasible. Protection and enhancement of habitats, species and designated sites has been detailed in sections 7.6-7.8 of the **Chapter 7 Ecology** (**APP-058**) Environmental Statement (ES) and secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**. Enhancement of the ecological networks has been detailed in the **Biodiversity Net Gain Strategy (APP-280)** and secured pursuant to Requirement 8 of Schedule 2 of the **Draft DCO.**
8.9	CLLP Policy S61 (Biodiversity Opportunity and Delivering Measurable Net Gains) states that all qualifying development proposals must deliver at least a 10% measurable biodiversity net gain (BNG) attributable to the development. The net gain should be calculated using Natural England's Biodiversity Metric and be provided on-site where possible. Unless specifically exempted by Government, a biodiversity gain plan should be submitted providing clear and robust evidence for biodiversity net gains and losses. This plan should also include details of the pre-development biodiversity value of the onsite habitat, the post-development biodiversity value of the onsite habitat following implementation of the proposed	The **Biodiversity Net Gain Strategy (APP-280)**, secured pursuant to Requirement 8 of Schedule 2 to the **Draft DCO (Document Ref: 3.1)**, sets out the biodiversity net gain for the Proposed Development. The Applicant has committed to net gains of at least 30 % in habitats, 10 % in hedgerows and 10 % in water course units calculated across the Site. The **Biodiversity Net Gain Strategy (APP-280)** sets out the pre-development (baseline) biodiversity value of the Site, along with the post-development value. The outline Landscape and Ecological Management Plan (APP-087) secured pursuant to Requirement 7 of Schedule 2 to the **Draft DCO (Document Ref: 3.1)** provides an overview of how the management of

	ecological enhancements/interventions, and an ongoing management strategy for any BNG proposals.	retained, enhanced and created habitats delivers the projected Biodiversity Net Gain. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.10	CLLP Policy S66 (Trees, Woodland and Hedgerows) states that planning permission will only be granted if the proposal provides evidence that it has been subject to adequate consideration of the impact of the development on any existing trees and woodland found on-site. Proposals for new development will also be expected to retain existing hedgerows where appropriate and integrate them fully into the design, having regard to their management requirements.	Proposed tree and hedgerow removals for the Bespoke Access Corridor and Solar Array Area are detailed in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)**. See also **Figure 6.32 Vegetation Removal Plan (APP-236 to APP-238)**. Paragraph 6.14 of **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** (secured by requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) includes the provision for BS 5837 compliant Arboricultural Method Statements and Tree Protection Plans to be prepared at the detailed design stage. These will include details for the protection of all retained trees, woodlands and hedgerows and will be completed for the Bespoke Access Corridor, Solar Array Area and Cable Route Corridor. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.11	SELLP Policy 3 (Design of New Development) states that development will be required to demonstrate, where relevant, how the incorporation of existing hedgerows and trees, and the provision of appropriate new landscaping to enhance biodiversity and green infrastructure, will be secured.	The incorporation of new and enhanced landscape features has been detailed in **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP)** (**APP-089**), secured pursuant to Requirement 7 of the Draft DCO **(Document Ref: 3.1)**. These are also illustrated on **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and further detailed within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)**

		and **Appendix 2.3 Embedded Mitigation (APP-076)**) (secured by the **Draft DCO**). The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.12	SELLP Policy 28 (The Natural Environment) states that gaps in the ecological network will be addressed by ensuring that all development proposals provide an overall net gain in biodiversity. This can be achieved by: • Protecting the biodiversity value of land, buildings and trees (including veteran trees) minimising the fragmentation of habitats; • Maximising the opportunities for restoration, enhancement and connection of natural habitats and species of principal importance; • Incorporating beneficial biodiversity conservation features on buildings, where appropriate, and maximising opportunities to enhance green infrastructure and ecological corridors, including water space; and • Conserving and enhancing biodiversity or geodiversity conservation features that will provide new habitat and help wildlife to adapt to climate change**.**	The baseline biodiversity of the land and trees has been assessed through Section 7.5 of **Chapter 7 Ecology** (**APP-058**) Environmental Statement (ES). Throughout the design of the Proposed Development, appropriate opportunities to enhance biodiversity through creation of habitats and strengthening the green and blue infrastructure have been taken. These are incorporated in **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP) (APP-089)**, secured pursuant to Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)** and the **Biodiversity Net Gain Strategy (APP-280),** secured pursuant to Requirement 8 of Schedule 2 of the **Draft DCO**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.13	The Council has reviewed the submitted information concerning the assessment of potential ecological effects of the proposed development. 6.2.7 Chapter 7 Ecology (APP-058) sets out the biodiversity and ecological elements of the Applicant's Environmental Statement (ES).	The Applicant notes this statement and addresses it within the relevant sections, below. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

8.14	The Council notes that ES Chapter 1 Introduction paragraph 1.2.9 (APP-052) states that "The EIA process has considered potential impacts resulting from the construction, operation (and maintenance), and decommissioning of the Proposed Development in order to identify likely significant effects, and measures to avoid, reduce or mitigate any significant adverse effects on the environment and enhancing it where possible". The Council welcomes this approach.	The Applicant has assessed impacts at each stage of the Proposed Development within Section 7.6 **Chapter 7 Ecology** (**APP-058**) Environmental Statement (ES), with mitigation detailed in Sections 7.8 and 7.8 of **Chapter 7**. Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures (secured by the **Draft DCO**) to be implemented. The mitigation is secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1).** Enhancements have been included where possible and detailed in the **Biodiversity Net Gain Strategy (APP-280),** secured pursuant to Requirement 8 of Schedule 2 of the Draft DCO **(Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
8.15	The Council considers that additional information / clarification is required to accurately identify the ecological interest features present and to determine the likely significant effects, mitigation requirements and any residual effects of the proposed development.	The Applicant notes this statement and addresses it within the relevant sections, below.
8.16	**Statutory Designated Sites** There are three internationally important sites designated for biodiversity within 20km of the proposal and two nationally important sites designated for biodiversity within 10km of the Order limits. The location of these sites is shown in 6.4.44 Figure 7.1 International Sites within 20km of the Site (APP-239) and 6.4.45 Figure 7.2 SSSI within 10km of Site (APP-240) respectively.	This statement is acknowledged and noted by the Applicant.

8.17	No direct impacts within these sites are predicted, however impacts on qualifying features of The Wash SPA and Ramsar site (gadwall) and The Wash and North Norfolk Coast SAC (otter) may occur and are discussed below.	This statement is acknowledged and noted by the Applicant. With regards to impacts on gadwall and otter, these have been discussed with Natural England and mitigation agreed within the **Habitats Regulations Assessment (APP-050).**
8.18	**Non-Statutory Designated Sites** 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 APP-241.	This statement is acknowledged and noted by the Applicant.
8.19	No significant effects on these sites are predicted during construction however, a significant effect is predicted during decommissioning (APP-058, 7.6.79) due to the potential effects of waterborne and airborne contaminants. It is not clear why there is a difference in the level of significance of effect between construction and decommissioning and this should be clarified.	As the alignment of the Bespoke Access Road and Cable Route is yet to be fixed, the Applicant took a worst-case scenario in terms of considering potential impacts during the construction and decommissioning phases of the Proposed Development. During construction and decommissioning there will be similar risks of impacts on non-statutory designated sites (Local Wildlife Sites) from airborne and waterborne pollutants. Refinements of the design and mitigation embedded within the project at construction (secured in the **oCEMP APP-077**) and decommissioning (secured in the **oDEMP APP-078**) has led to more certainty on the impacts at both stages and the significance of effect can be reduced at the decommissioning stage within the **Chapter 7 Ecology (APP-058)** Environmental Statement (ES). This has been updated for Deadline 2.
8.20	**Habitats Regulations** A Shadow Habitats Regulations Assessment report (APP-050) has been prepared which assesses potential pathways for Likely Significant Effects on the Wash SPA/Ramsar and The Wash and North Norfolk Coast SAC which lie approximately 15km to the east of the solar array area.	This statement is acknowledged and noted by the Applicant.

8.21	Whilst there are no direct effects predicted within the sites, sensitive ecological receptors that may be associated with the sites may be affected by the proposed development. APP-058 identifies the potential for significant effects on the conservation status of both gadwall and otter. Details of the proposed mitigation for impacts, principally from disturbance, and otter where impacts relate to both potential habitat loss and direct injury or mortality during construction. APP-050 includes details of proposed mitigation for effects on both gadwall and otter and concludes that with mitigation in place there will be no adverse effects on The Wash SPA / Ramsar or The Wash and North Norfolk Coast SAC.	This statement is acknowledged and noted by the Applicant. With regards to impacts on gadwall and otter, these have been discussed with Natural England and mitigation agreed and documented within the **Habitats Regulations Assessment (APP-050).** For completeness the Applicant would also like to state that lapwing were raised as an additional qualifying species which could be impacted by the Proposed Development in **Natural England's Relevant Representations (RR-015)**. Further mitigation has been proposed to Natural England in the Draft Statement of Common Ground which the Applicant intends to agree at Deadline 3. It is therefore considered that the Proposed Development will have no adverse effects on the Wash SPA and Ramsar or the Wash and North Norfolk Coast SAC or the qualifying features of these designated sites.
8.22	The Examining Authority will need to satisfy itself that sufficient information has been submitted by the Applicant in relation to impacts on these species and measures that will be implemented to mitigate these in order to determine that there will be no adverse effect on the conservation status of these species and the sites they are associated with.	This is noted by the Applicant. Natural England have reviewed the **Habitat Regulations Assessment (APP-050)** and have agreed with the mitigation for gadwall and otter in their Relevant Representations (see **Relevant Representations (RR-015)** submitted at Deadline 1).
8.23	**Existing Biodiversity Value** A range of both desk-based studies and field surveys has been undertaken to establish the suite of habitats present within the DCO site boundary. These are described in APP-058 and associated appendices.	This statement is acknowledged and noted by the Applicant.

8.24	The Council is of the opinion that additional information/clarification is required to accurately determine the site's existing baseline value. • Botanical survey timing: 6.3.30 Appendix 7.11 Botanical Survey Report Solar Array Area (APP-100) states that botanical field surveys within the solar array area were undertaken in July 2023. This is outside of the window which would allow the presence of any late flowering scarce arable flora to be identified and also outside of the optimal window for woodland botanical surveys. • Woodland habitats: Mapping available on the MAGIC website indicates that there are areas of Priority Woodland Habitat within the solar array area. These correspond with Woodlands 3, 4 and 5 identified in APP-100. Paragraph 4.1.16 acknowledges that W3, 4 and 5 meet the criteria for priority habitat, however this does not seem to have been correctly reflected in the BNG assessment or the submitted statutory biodiversity metric.	The Applicant notes these points. Regarding survey timing, botanical surveys were assessed within the main flowering season. It is recognised, however, that species flower at different times and it is not practical to survey throughout the season. Therefore, a precautionary approach has been taken; existing field margins will be maintained (detailed within **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** secured pursuant to Requirement 7 of Schedule 2 the **Draft DCO (Document Ref: 3.1)**) and where they are temporarily removed in the Solar Array Area, the seedbank will be stored and replaced post construction (this has been secured within **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** secured pursuant to Requirement 12 of Schedule 2 the **Draft DCO**). The timing of the woodland survey has been taken into account, although the Proposed Development will not impact woodland habitat in the Solar Array Area. The woodland in the **Biodiversity Net Gain Strategy (APP-280)** is being reviewed and any updates to the baseline will be completed at Deadline 3.
8.25	**Protected and priority species** Subject to clarification of the above, APP-058 identifies a range of ecological impacts. These potential impacts include both permanent and temporary or damage to habitats, including the potential for the spread of invasive non-native species (INNS). The Applicant has prepared an outline Construction Environmental Management Plan (oCEMP) (APP-077), an outline Landscape and Ecological Management Plan (oLEMP) (APP-089), and an outline Decommissioning Environmental Management Plan	This statement is acknowledged and noted by the Applicant. The proposed avoidance and mitigation measures are incorporated within **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1).**

	(oDEMP) (APP-078) which include measures aimed at mitigating these impacts. The Council agrees with the Applicant's approach and considers that the proposed impact avoidance and mitigation measures for construction, operational and decommissioning phases of the development will need to be secured in the DCO.	
8.26	A suite of both desk-based studies and field surveys has been undertaken to identify protected and priority species likely to occur within the DCO Site Boundary. These are described in (APP-058) and associated appendices. LCC has reviewed the application in accordance with Natural England's standing advice for protected species. Having considered (APP-058) LCC is of the opinion that additional information/clarification is required to accurately determine the presence/absence of protected and priority species and the likely effects of the proposed development. • **Badgers:** It is unclear whether badger surveys have been undertaken in the cable route and access road. This should be clarified. APP-058 paragraph 7.11.5 states that buffers will be used around main badger setts. The Council is of the opinion that all badger setts should be buffered. • **Bats:** A recent study (Tinsley *et al.*, 20231) has shown a decrease in levels of bat activity associated with the presence of solar developments, though reasons for this are not yet clearly understood. The Council recommends that monitoring of post-construction bat activity is undertaken to compare activity levels prior to construction and to assess mitigation efficacy in order to increase	**Badgers** - With regards to badgers, the Applicant has undertaken walkover surveys (see Sections 2.3 and 3.3. of **Appendix 7.20 Preliminary Ecological Appraisal (cable route and access road) (APP-112).** As the detailed design and exact on-the-ground routing is not yet known, it is not possible to say precisely what level of impact will occur to badgers. However, updated surveys are secured in the **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010),** secured pursuant to Requirement 12 of Schedule 2 the **Draft DCO (Document Ref: 3.1)** which will also allow for any changes in sett distribution between the 2024 survey and construction. The Applicant takes the approach that, wherever possible, badger setts will be avoided and this has shaped the design of the project to date. However, there may be some requirement to temporary close setts under licence from Natural England, but setts will be re-opened following construction. **Bats -** The Applicant has reviewed the paper referred to (Tinsley *et al* 2023). It is noted that while there is limited research in this area, one recommendation of the paper is to strengthen habitat connections as has been secured in **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP) (APP-089),** secured pursuant to Requirement 7 of Schedule 2 of the **Draft DCO.**

	understanding of the impacts of solar developments on local bat populations. • **Riparian mammals:** APP-058, paragraph 7.7.11 states that sections of potential water vole habitat of up to 30-50m on each bank may need to be removed. The Council queries the need for such wide maximum clearance areas. • **Breeding birds**: The proposed development has the potential to result in negative effects on the populations of a number of species / species groups including Schedule 1 breeding birds and a farmland bird assemblage that is considered to be of County Level Importance. • **Fish:** Given the record of spined loach occurring in the South Forty Foot Drain, specific measures to avoid impacts on the species should be set out in the CEMP.	**Riparian Mammals -** The Applicant has taken a worst-case maximum approach for habitat removal; Table 2.1 (design parameters) of Chapter 2 (APP-053) states the working width of the cable route is 30 m (with open cut trench width for ditch crossings approximately 2 m), and the Bespoke Access Road working width is 50 m. Along the Cable Route trenchless techniques, such as auger boring, horizontal directional drilling (HDD) or micro-tunnelling will be undertaken where environmental assessment determines that mitigation for an environmental impact is required or design constraints concludes the need for an alternative to open trenching. Following construction the working areas will be replanted The approach to ditch crossings is secured in **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)**, secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO.** **Breeding birds –** please see response, below. **Fish -**The Applicant has committed to trenchless techniques to cross the **South Forty Foot Drain in Section 2.11.4 of Chapter 2 (APP-053)**. Therefore there will be no impact on spined loach, or other fish, in the South Forty Foot Drain.
8.27	Details of specific mitigation measures in relation to Schedule 1 breeding birds should be included in the CEMP.	Barn owl were the only Schedule 1 (of the Wildlife and Countryside Act 1981) bird species positively recorded breeding within the site boundary. **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)**, secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)** secures update surveys for nesting bird species (including Schedule 1 species) pre-commencement. It will be at this stage that an assessment will be made as to the required no-

		works buffer around any nests. This will depend on the type of nest (for example, the barn owl was noted to share its nest with other species and likely more tolerant of disturbance than other barn owls) and on the work proposed. The creation of new grassland and hedgerows will benefit Schedule 1 species, for example with the creation of vegetated water course buffers, barn owls should have a greater supply of small mammal prey leading to better breeding success. Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures (secured by the **Draft DCO**) to be implemented.
8.28	APP-058, 7.6.53 states that there will be a "permanent very low adverse impact" on skylark due to the loss of nesting impact. This is likely to mean that other species with similar requirements are also negatively impacted. Given the number of other solar developments in the county, the Council is of the opinion that the development should seek to ensure that adequate provision is made for loss of ground nesting birds to avoid a negative impact.	The Applicant has made provisions to minimise the impacts on ground nesting birds outlined in Section 7.6 of the **Chapter 7 Ecology (APP-058)** Environmental Statement (ES). These include enhancing the value of grassland, including buffer strips along water courses and residential buffers, and fencing off areas to avoid mammals (including badgers and hedgehogs) eating ground nesting bird's eggs. These measures, secured in **Appendix 6.7 outline Construction and Environmental Management Plan (oCEMP) (APP-077)** and secured pursuant to Requirement 12 of Schedule 2 of the Draft DCO **(Document Ref: 3.1),** are expected to mitigate for impacts on ground nesting birds. Supplementary to the above, Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) also detail the mitigation measures (secured by the **Draft DCO**) to be implemented.

8.29	Where protected species will be affected by the proposed development, a licence from Natural England will be sought and mitigation will be secured as part of the licensing process. The Council agrees with this approach.	This statement is acknowledged and noted by the Applicant. The Applicant submitted a draft licence application for great crested newts to Natural England and received a Letter of no Impediment on 23rd September 2025. The Applicant has confirmed they will continue to liaise with Natural England regarding future licence applications in the **Applicant Responses to Relevant Representations (REP1-029**) submitted at Deadline 1.
8.30	Once details of appropriate mitigation are confirmed for construction, operational and decommissioning phases of the development, these will need to be secured in the DCO.	This statement is acknowledged and is the approach adopted by the Applicant in the draft DCO, as outlined in the responses above.
8.31	**Biodiversity Net Gain** The delivery of at least 10% BNG is not currently mandatory for NSIPs however it is considered best practice. Given the scale and nature of the proposed development the Council will expect the project to deliver significantly more than 10% BNG.	The **Biodiversity Net Gain Strategy (APP-280)** secured pursuant to Requirement 8 of Schedule 2 of the Draft DCO **(Document Ref: 3.1)** sets out the biodiversity net gain for the Site. The Applicant has committed to net gains of at least 30 % in habitats, 10 % in hedgerows and 10 % in water course units covering the whole Site.
8.32	The Applicant has set out their approach to BNG in Section 7.3 Biodiversity Net Gain Strategy (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 predicted 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. This level of BNG if achievable would be acceptable, however, certain elements of the BNG assessment require additional information and clarification. • Biodiversity opportunity mapping and strategic significance - The Greater Lincolnshire Local	The Applicant has set out their approach to BNG in Section 7.3 Biodiversity Net Gain Strategy (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 predicted 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. This level of BNG if achievable would be acceptable, however, certain elements of the BNG assessment require additional information and clarification. • Biodiversity opportunity mapping and strategic significance - The Greater Lincolnshire Local

Nature Recovery Strategy (LNRS) is still in preparation. In the absence of an LNRS, Biodiversity Opportunity Areas identified in the Central Lincolnshire Local Plan should be used to assign strategic significance in the Statutory Biodiversity Metric. Areas within the draft DCO boundary are identified in the biodiversity opportunity mapping. The metric should therefore be updated to reflect this which will affect the baseline biodiversity value calculations.

- Priority woodland habitat: As stated above, the priority woodland habitat identified in APP-100 is not included in the metric calculations. This will affect the baseline biodiversity value calculations.
- Tree removal: The Applicant's OLEMP (APP-089) paragraph 2.4,4 refers to areas of vegetation removal within the solar array area including six individual trees, one tree group and parts of another two trees groups. It is unclear whether removal of these trees has been captured in the metric calculation.
- Bicker Fen substation: The Applicant's BNG strategy (APP-280) does not currently seem to include details of proposals for BNG at the Bicker Fen substation site.

Proposed lowland meadow habitat creation: Successfully establishing good condition lowland meadow habitat which requires nutrient poor soils on currently arable land is likely to be very challenging and will require significant management input. Additional reasoning and justification is

Nature Recovery Strategy (LNRS) is still in preparation. In the absence of an LNRS, Biodiversity Opportunity Areas identified in the Central Lincolnshire Local Plan should be used to assign strategic significance in the Statutory Biodiversity Metric. Areas within the draft DCO boundary are identified in the biodiversity opportunity mapping. The metric should therefore be updated to reflect this which will affect the baseline biodiversity value calculations.

- Priority woodland habitat: As stated above, the priority woodland habitat identified in APP-100 is not included in the metric calculations. This will affect the baseline biodiversity value calculations.
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- Bicker Fen substation: The Applicant's BNG strategy (APP-280) does not currently seem to include details of proposals for BNG at the Bicker Fen substation site.

Proposed lowland meadow habitat creation: Successfully establishing good condition lowland meadow habitat which requires nutrient poor soils on currently arable land is likely to be very challenging and will require significant management input. Additional reasoning and justification is required in order

	required in order to give confidence that this habitat type can realistically be delivered in the targeted good condition.	to give confidence that this habitat type can realistically be delivered in the targeted good condition.
8.33	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.	The Applicant met with representatives of Lincolnshire County Council (LCC) on the 14th August and discussed this point. Further details will be given on the grassland creation including reference to the floodplain meadow grassland being in known flood zones within **Chapter 7 Ecology (APP-058)** Environmental Statement (ES) at Deadline 2.
8.34	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.	This statement is acknowledged and noted by the Applicant. The Applicant is reviewing their options to do this.
8.35	**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 other NSIP scale energy developments. Details of the approach to cumulative effects are presented in ES Chapter 18 Cumulative Effects (APP-069) and APP-058.	This statement is acknowledged and noted by the Applicant.
8.36	The Applicant's assessment concludes that there will be no significant adverse effects on ecology arising from cumulative impacts, however, as stated above the Council considers that there remains a potential for cumulative impacts with other solar developments on ground nesting birds. Details of additional measures to be taken to avoid negative impacts on ground nesting birds should be provided.	The Applicant has made provisions to minimise the impacts on ground nesting birds outlined in Section 7.6 of the **Chapter 7 Ecology (APP-058)** Environmental Statement (ES). These include enhancing the value of grassland, including buffer strips along water courses and residential buffers, and fencing off areas to avoid mammals (including badgers and hedgehogs) eating ground nesting bird's eggs. These measures, secured in the **oCEMP (APP-077)** secured pursuant to Requirement 12 of the Draft DCO **(Document**

		Ref: 3.1) are expected to mitigate for impacts on ground nesting birds. Taken into account with mitigation measures on other proposed developments there is expected to be no significant cumulative effects on ground nesting birds.
8.37	**Ecological Steering Group** The Council suggests that consideration is given to the establishment of an Ecological Steering Group or similar for the proposed development. This group should consist of key ecological stakeholders (both statutory and non-statutory). The remit of the group would be to receive updates on project progress and to advise on issues encountered during construction as well as to refine delivery of required mitigation and enhancement measures. Meetings should be held at an appropriate frequency to ensure good communication between both the developer and stakeholders.	This is noted and the Applicant is exploring how this could work. Please refer to our response to question GCT.1.11 in the **Applicant's Responses to the ExAs ExQ1 (Document Ref. 9.6)** submitted at this deadline.
8.38	Establishing such a group is also likely to yield benefits by assisting with the identification of opportunities for strategic working with other solar NSIP developers in the vicinity. This is particularly the case in relation to the delivery of BNG where strategic delivery could result in significant benefits for species groups such as ground nesting birds.	This is noted.
8.39	**Overall impact of the development on ecology and biodiversity** The Applicant's ES identifies a series of potential impacts on ecology arising from the development. These range from minor adverse impacts to significant adverse impacts depending on the species, habitat or site concerned. The Council has identified several areas within the Applicant's ES where additional information / clarification is required so a precise assessment of the potential impacts is not	The Applicant notes these comments. **Chapter 7 Ecology (APP-058)** Environmental Statement (ES) has taken a worst case approach to the assessment of impacts from the Proposed Development given that the detailed design is still being evolved and the project timescales mean surveys will need updating in places pre-construction. Ecology has been incorporated throughout the evolution of the Proposed Development and will continue to be taken into account to avoid and minimise impacts of the detailed design wherever

	possible at this stage. However, based on the information provided, the Council considers that the development would have a minor permanent **negative** impact on ecology.	possible. **Chapter 7 Ecology (APP-058)** will be updated as necessary to clarify impacts and mitigation, and these clarifications will be secured by **Appendix 2.4 Outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010),** secured pursuant to Requirement 12 of Schedule 2 of the **Draft DCO (Document Ref: 3.1), Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP) (APP-089),** secured pursuant to Requirement 7 of Schedule 2 of the **Draft DCO).**
8.40	With regard to BNG, the Applicant has signalled an intention to deliver BNG. As stated above, clarification of the BNG calculations is required and it is recognised that this will be subject to confirmation of final scheme designs. However, if the levels currently anticipated are delivered, the Council considers that overall, the development could have a positive impact in terms of BNG. Commitments to deliver a minimum of 10% BNG should be secured with a specific requirement in the DCO if BNG is to be given **positive** weight in the planning balance.	The requirement for Biodiversity Net Gain (BNG) is secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1).** Details of how to deliver net gain of at least 30 % for habitats, 10 % for hedgerows and 10% for watercourses are included in the **BNG Strategy (APP-280).**
9	**Cultural Heritage**	
9.1	Paragraphs 5.9.22 to 5.9.36 of NPS EN-1 set out the key considerations for determining applications where there is potential for adverse impacts on the historic environment above, at and below the surface of the ground. It requires the SoS to identify and assess the particular significance of any heritage asset that might be affected by the development, including setting.	This is noted and the Applicant has set out within Section 8.4 of **Cultural Heritage Chapter 8 (APP-059)** an assessment of all heritage assets likely to be impacted, directly or indirectly, by the Proposed Development. This assessment is supported by **Appendix 8.1 Archaeological Desk Based Assessment (APP-117), Appendix 8.2 Heritage Statement (APP-118), Appendix 8.3 Aerial and Lidar Assessment - Solar Array Area (APP-119), Appendix 8.4 Aerial and Lidar Assessment - Access and Cable Routes (APP-120), Appendix 8.6 Geophysical Survey - Solar Array Area**

		(APP-122 to APP-126), **Appendix 8.8 Geophysical Survey - Access and Cable Route (APP-128 to APP-148), Appendix 8.10a Trial Trenching Report - Solar Array (APP-150 to APP-151)**, **Appendix 8.10b Trial Trenching Report - Targeted Access Route (APP-152)**. Above ground heritage assets have been assessed including providing an understanding of the level of significance (importance / value) which is set out within **Cultural Heritage Chapter 8 (APP-059) and supported by Appendix 8.2 Heritage Assessment (APP-118)** and identifying the particular setting of the assets that would contribute to their significance, and also how the proposed development would effect that setting. This is set out within **Appendix 8.2 Heritage Assessment (APP-118)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
9.2	The NPPF Chapter 16 (Conserving and enhancing the historic environment) places a requirement on applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Similar to EN-1 it requires Local Planning Authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. Paragraphs 212 to 216 of the NPPF align with EN-1 and require great weight to be given to conserving heritage assets and any harm or loss to a heritage asset requires clear and convincing justification. In cases where the proposal would lead to substantial harm or total loss of a heritage would result consent should be refused unless certain criteria are met, this includes where the harm or loss is necessary for sustainable public benefit. Where less than substantial harm to the significance of the heritage asset would occur	This comment has been noted, and the Applicant has considered this within the Section 8.4 of **Chapter 8 Cultural Heritage (APP-059)** and is supported by **Appendix 8.2 Heritage Statement (APP-118),** for above ground heritage. **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**, supported by **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)**, has assessed the archaeological potential and the evaluation documents have identified the potential and significance. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** will ensure that below ground heritage assets will be subject to preservation by design and that no asset of significance will be impacted. Any dense areas of assets (archaeology) will also be avoided.

	it should be weighed against the public benefits. For non-designated heritage assets a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277).**
9.3	Local Policies: • CLLP Policy S57: The Historic Environment • SELLP Policy 2: Development Management • SELLP Policy 3: Design of New Development • SELLP Policy 29: The Historic Environment • LMWLP Policy DM4: Historic Environment	This comment has been noted, and the Applicant has set this out within Section 2.4 **Appendix 8.2 Heritage Statement (APP-118)** and Section 8.4 of **Chapter 8 Cultural Heritage (APP-059)**. The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**, aside from DM4 which is considered to be of relevance to Mineral and Waste related development. For this reason, this policy was not included in the list of relevant local development plan policy which was shared and agreed with LCC in the Pre-Application period, as set out in the **Statement of Common Ground with Lincolnshire County Council (REP1-016)**.
9.4	CLLP Policy S57 (The Historic Environment) states that development proposals are required to protect, conserve, and seek opportunities to enhance the historic environment of Central Lincolnshire. Proposals will be supported where they protect the significance of heritage assets (including where relevant their setting) and take into account the desirability of sustaining and enhancing non-designated heritage assets and their setting. In instances where a development proposal would affect the significance of a heritage asset (where designated or non-designated), the Applicant will be required to undertake and provide information on the significance of the asset; the impact of the proposed development on the significance and special character of the asset; and a clear justification for the	This comment has been noted, and the Applicant has set this out within Section 8.4 of **Chapter 8 Cultural Heritage (APP-059)** supported with further detail within section 2.4 (Local Policy) of **Appendix 8.2 Heritage Statement (APP-118)**. # The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

	works so that the harm can be weighed against public benefits.	
9.5	This policy also states that where development proposals would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits, including, where appropriate, securing its optimum viable use, outweigh the harm. In addition to this, development affecting archaeological remains, whether known or potential, designated or undesignated, should take every practical and reasonable step to protect and, where possible, enhance their significance.	This comment has been noted, and the Applicant has set this out within Section 8.4 of **Chapter 8 Cultural Heritage (APP-059), Appendix 8.1 Archaeological Desk Based Assessment (APP-117),** and **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)**, which has set out a comprehensive plan of avoidance of impact and in the few instances this cannot be achieved mitigation by record, but only of heritage assets assessed to be of low or very low significance. The onus has always been to conserve heritage assets through design and this is set out within **Appendix 8.2 Heritage Statement (APP-118)** for above ground assets and **Appendix 8.11 Archaeological Mitigation Strategy (APP-118)** for archaeology. Public benefits through public outreach are set out within **Appendix 8.11 Archaeological Mitigation Strategy (APP-118)**. Other public benefits of the Proposed Development are set out in Section 7 the **PS (APP-277)**. In summary, urgent and unprecedented actions are required on a global scale to halt climate change. A rapid increase in the supply of low carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation and battery storage are a critical part of the UK's strategy to achieve net zero by 2050, a key step towards which is the government's national mission for 'Clean Power by 2030'. The Proposed Development is capable of connecting to the grid before 2030.

		These benefits are considered to provide a clear and convincing justification and as such, paragraph 5.9.28 of EN-1 is considered to be complied with. The performance against Policy S57 is set out in Appendix 4B of the **PS (APP-277)**.
9.6	Planning applications for such development should be accompanied by an appropriate and proportionate assessment to understand the potential for and significance of remains, and the impact of development upon them. If initial assessment does not provide sufficient information, developers will be required to undertake field evaluation in advance of determination of the application. This may include a range of techniques for both intrusive and non-intrusive evaluation, as appropriate to the site.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** in the ES which is supported by field evaluation in accordance with policy. This comprised geophysical survey (**Appendix 8.6 – APP 122-126**) and trial trenching (**Appendix 8.10a/b – APP-150-152**). **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** prepared in consultation with LCC acknowledges the results of fieldwork and ensures the undertaking of additional evaluation to ensure that harm is mitigated in the appropriate manner, either through design (avoidance) or record.
9.7	Wherever possible and appropriate, mitigation strategies should ensure the preservation of archaeological remains in-situ. Where this is either not possible or not desirable, provisions must be made for preservation by record according to an agreed written scheme of investigation submitted by the developer and approved by the planning authority.	This comment has been noted by the Applicant, and mitigation strategies are set out within **Chapter 8 Cultural Heritage (APP-059)** in the ES. and in detail within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153), the document** has been prepared in consultation with LCC to ensure that harm is mitigated in the appropriate manner, either through design (avoidance) or record. The protocol for preservation by record, archaeological excavations, is set out within Section 4.4 A**ppendix 8.11 Archaeological Mitigation Strategy (APP-153)** which has been submitted Deadline 2 and agreed with LCC.

9.8	SELLP Policy 2 (Development Management) states that proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to any impact upon or enhancement of historical buildings and heritage assets. Similarly, SELLP Policy 3 (Design of New Development) states that development proposals will be required to demonstrate, where relevant, how a sense of place will be created by complementing and enhancing designated and non-designated heritage assets.	This comment has been noted, and the Applicant has set this out within Section 8.4 of **Chapter 8 Cultural Heritage (APP-059)** and supported by **Appendix 8.2 Heritage Statement (APP-118)**. It should be noted that there is no direct impact on historic buildings, any impact is indirect to the setting of heritage assets. Enhancement is through public benefits which is set out in **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** section 6. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
9.9	SELLP Policy 29 (The Historic Environment) states that distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced. Opportunities to identify a heritage asset's contribution to the economy, tourism, education, and the local community will be utilised, including the historic archaeological and drainage landscape of the Fens. As such, development proposals will be required to conserve and enhance the character and appearance of designated and non-designated heritage assets.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** in the ES. Opportunities for enhancement of archaeological assets in terms of public record and public benefits has been outlined within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)**, prepared in consultation with LCC. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
9.10	Policy DM4 (Historic Environment) reiterates CLLP Policy S57, and states that proposals with the potential to affect heritage assets including features of historic or archaeological importance (whether known or unknown) should be accompanied by an assessment of the significance of the assets and the potential impact of the development proposal on those assets and their settings. Where any impact on heritage assets is identified, the assessment should provide details of the proposed mitigation measures that would be implemented. These should include details of any conservation of assets to be	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** in the ES. This has also been evaluated in terms of below ground archaeological assets, and **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been prepared in consultation with LCC to ensure that harm is mitigated in the appropriate manner, either through design (avoidance) or record. This has been supported by a multilayer non-intrusive survey approach, a landscape approach to assessing and understanding archaeological potential, and set out within the following documents; **Appendix 8.1 Archaeological Desk**

	lost and provision for the results to be made publicly available.	**Based Assessment (APP-117), Appendix 8.3 Aerial and Lidar Assessment - Solar Array Area (APP-119), Appendix 8.4 Aerial and Lidar Assessment - Access and Cable Routes (APP-120), Appendix 8.6 Geophysical Survey - Solar Array Area (APP-122 to APP-126), Appendix 8.8 Geophysical Survey - Access and Cable Route (APP-128 to APP-148), Appendix 8.10a Trial Trenching Report - Solar Array (APP-150 to APP-151), Appendix 8.10b Trial Trenching Report - Targeted Access Route (APP-152).** The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
9.11	NPS EN-1 paragraph 5.9.21 states that where there is high probability (based on an adequate assessment) that a development site may include yet undiscovered heritage assets with archaeological interests then requirements should be considered to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction. This is largely carried through in NPS EN-3.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** in the ES. Archaeological features and deposits, known and unknown has been evaluated in terms of below ground archaeological assets, and an **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been prepared in consultation with LCC to ensure that harm is mitigated in the appropriate manner, either through design (avoidance) or record. There is a process outlined within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** that details that appropriate procedures are in place for the identification and treatment of such assets discovered during construction, or indeed unexpected discoveries, this process follows accepted professional practice and guidance from Historic England. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

9.12	**Built Heritage** Subject to the detailed comments below, the Council is broadly satisfied that the methodology represents an appropriate approach. The ES Chapter 8 – Cultural Heritage Vol 1 (APP-059) identifies key sensitive designated receptors at paragraph 8.6.5 and non-designated receptors at paragraph 8.6.6. Embedded mitigation is also acknowledged, including buffers to increase the distance between development and nearby heritage assets. However, while the methodology is acceptable in principle, insufficient weight has been applied to certain assets, and a group-value approach should be adopted in relation to historic farmsteads, consistent with approaches taken in other NSIPs in the region.	The application of Tables 8.2-8.4 presented in **Chapter 8 Cultural Heritage** (**APP-059**) during the assessment of impacts provides for the proportionate weighting of an assets' significance in the understanding of overall impact. Table 8.9 clearly assigns a 'Low' level of importance to the farmsteads which are classified as such due to their non designated status reflecting their limited architectural and historic interest. This provides for their correct level of weighting in the assessment of impact. There is no guidance or mechanism to inflate the weight provided in respect to the assets when considered as a group – i.e. group value would not provide for a greater level of importance in the determination of impact. The Applicant therefore disagrees that sufficient weighting has not been given. To confirm assets have been assessed individually as set out within **Chapter 8 Cultural Heritage (APP-059)** and supported by **Appendix 8.2 Heritage Statement (APP-118)**. 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, with inbuilt flexibility, 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)**.
9.13	**Changes to Setting and Potential Harm to Receptors** The ES identifies a Moderate Adverse (significant) effect on the Grade I listed Church of St Andrew, Asgarby (APP-059 paragraph 8.7.7, Table 8.8). The Council agree with this conclusion but consider that equivalent weight should also	In accordance with the methodology presented in Tables 8.3 of **Chapter 8 Cultural Heritage** (**APP-059**), Grade II Asgarby Hall, at Grade II would not be provided with the same weight

be given to the nearby Grade II listed Asgarby Hall (NHLE 1168367), whose principal elevations overlook the historic parkland where the new infrastructure would be visible. This asset is not fully assessed in the ES despite being listed as a sensitive receptor at paragraph 8.6.5. The Grade II listed Asgarby Hall (NHLE 1168367), is also insufficiently assessed: the ES records only a slight adverse effect during operation (Table 8.9) and omits construction-phase impacts, despite its proximity and inter-visibility with the access infrastructure. Both assets require more robust assessment and, where necessary, bespoke mitigation.	as a Grade I listed Church of St Andrew. The Applicant disagrees that the assets should be afforded the same weight. The assets including the Grade I listed Church of St Andrew, Asgarby Grade II listed Asgarby Hall (NHLE 1168367), and the Grade II listed Boughton House (NHLE 1061835), have been assessed individually as set out within **Chapter 8 Cultural Heritage (APP-059)** and supported by **Appendix 8.2 Heritage Statement (APP-118)**. Based on the agreed assessment matrix, slight adverse effects have been identified during the construction phase. The identified impacts acknowledge the mitigation measures proposed, including landscaping and retention of field formations,. The embedded mitigation measures are bespoke to each asset, with inbuilt flexibility, and have been proposed to reduce the level of harm to the designated and non-designated assets set out within **Appendix 2.3 Embedded Mitigation (APP-076)**. This has been noted by the Applicant and set out within **Chapter 8 Cultural Heritage** of the ES **(APP-059)**. 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. Subsequent to the production of the ES chapter, 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 (approx. 1.25km in distance) 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).

		In conclusion, the effect to St Andrews Church was confirmed as moderate effect during the construction and decommissioning phase (short term effect) and a slight effect during the operational phase. Asgarby Hall was assessed to have a slight effect during the construction and decommissioning phases and a neutral effect during the operational phase. This would result in less than substantial harm.
9.14	Additional assets also warrant consideration. Austhorpe Farm (Grade II, NHLE 1306847), situated only a few hundred metres from the order limits, has potential for altered views from the north-east, affecting its historic setting. Thorpe House (Grade II, NHLE 1360566), in juxtaposition to Austhorpe Farm, may also experience harm as approaches and views are altered. These assets require further assessment and, where appropriate, screening to reduce harm.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** in the ES. These assets were assessed and considered not to be subject to harm; there is no intervisibility between the assets and the proposed development due to intervening built environment and landscape as set out in section 8.3 of **Chapter 8 Cultural Heritage (APP-059)** and as set out within **Appendix 2.3 Embedded Mitigation (APP-076).**
9.15	The cluster of designated assets at Howell, comprising the Old Rectory (Grade II, NHLE 1061834), the Church of St Oswald (Grade II*, NHLE 1061833), and Howell Hall (Grade II, NHLE 1168460), also raise concerns. Although inter-visibility with the proposed development is limited, they are located close to the order limits and derive significance from their shared rural setting. Solar arrays along the eastern approach to Howell, including Howell Fen Drove (which is bisected by the order limits), will alter the character and experience of the landscape setting of these receptors, including approaches to and from the village.	This comment has been noted by the Applicant, and it is set out within section 8.6 of **Chapter 8 Cultural Heritage (APP-059)** in the ES 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. Regarding Old Rectory (Grade II, NHLE 1061834), the Church of St Oswald (Grade II*, NHLE 1061833), there is no intervisibility between these assets and the proposed development to the north. Furthermore, embedded mitigation measures have proposed

		a setback buffer and infilling of the boundary north of Howell Fen Drove, as set out within **Appendix 2.3 Embedded Mitigation (APP-076)**.
9.16	The ES also underplays cumulative impacts on Kyme Tower (Grade I, NHLE 1204786 and Scheduled Monument). The SoS's decision on Heckington Fen Solar Farm found that development within its setting would cause less than substantial harm, with cumulative effects given moderate negative weight. Beacon Fen now represents the cumulative change identified but not quantified in that decision. Kyme Tower's wider agrarian setting is integral to its significance, and large-scale solar infrastructure would diminish how the monument is experienced, shifting its context towards semi-industrial characteristics. As a Scheduled Monument, national policy (NPS EN-1 paragraph 5.9.30; NPPF paragraph 213 (b)) makes clear that harm to assets of the highest significance should be wholly exceptional and must be clearly and convincingly justified. The ES understates this impact, which could amount to substantial harm, or at minimum less than substantial harm at the higher end of the scale. This harm must be afforded the greatest weight in decision-making.	This comment has been noted by the Applicant, and it is set out within section (8.6) **Chapter 8 Cultural Heritage (APP-059)** in the ES. 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 less than substantial harm to the setting of Kyme

		Tower. This acknowledges the embedded mitigation proposed **Appendix 2.3 Embedded Mitigation (APP-076)**. 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, by the introduction of a new permissive path, reinstating a historic route. The distance between the South Kyme heritage cluster (including Kyme Tower) and the Proposed Development is approx. 1.25km and a further 30m beyond the Midfodder Dike, this prevents intervisibility for all assets with the exception of the upper battlements of Kyme tower were there are glimpsed views of the tower from the proposed development to the west. The Applicant therefore contests the level of harm in that the level of harm is clearly within the less than substantial harm parameter.
9.17	**Historic Farmsteads** Historic farmsteads within the order limits and wider study area are an integral part of Lincolnshire's agricultural heritage, reflecting traditional rural practices and contributing to the region's distinct historic character. The Historic Farmsteads in Greater Lincolnshire Assessment Framework and Greater Lincolnshire Farmstead Character Statement2 highlights their importance. The ES, however, treats each farmstead individually and fails to assess their collective value as a historic farming landscape. This risks overlooking how these farmsteads, when understood together, contribute to the area's rural distinctiveness. The introduction of large-scale infrastructure risks severing	This comment has been noted by the Applicant, and it is set out within section (8.6) **Chapter 8 Cultural Heritage (APP-059)** in the ES. Non designated Heritage Assets include Unnamed Farmstead, Ewerby and Evedon (non-designated HER MLI121913); Westmorelands, Asgarby Fen Farm (non-designated HER MLI121926), and; Gashes Barn (non-designated HER MLI121916), and other historic farmsteads. The Heritage Statement reviewed both documents as part of the assessment set out within A**ppendix 8.2 Heritage Statement (APP-118).** Which was useful in terms of understanding the effect on a largely rural landscape reviewing the non-designated farmsteads against The Historic Farmsteads in Greater Lincolnshire Assessment Framework

these connections, eroding both their physical setting and the intangible heritage that links them to Lincolnshire's agricultural past.	and Greater Lincolnshire Farmstead Character Statement regarding the effect on the historic landscape in general. Greater Lincolnshire Assessment Framework and Greater Lincolnshire Farmstead Character Statement are robust assessments, and further engagement in light of both assessments may be useful. These assets, however, have been assessed individually. Based on the agreed assessment matrix, slight adverse effects have been identified during the construction phase, not significant and less than substantial harm. However, group value would not provide for a greater level of importance in the determination of impact. The Applicant, therefore, disagrees that sufficient weighting has not been given. These effects are considered in the worst case and acknowledge embedded mitigation measures proposed, including landscaping, buffer zones, infilling of existing boundaries and retention of field formations (which is integral to the setting of a farmstead). These measures minimise; harm during the operational phase. This is essentially a rural 19th century landscape, and the proposed development is designed to sit within that landscape respecting the historic field pattern and historic route ways. The physical attributes of the non-designated assets have not been impacted or the immediate setting, this has been preserved by the design as set out in the **Embedded Mitigation (APP-076)**. This supports the **Appendix 8.2 Heritage Statement (APP-118)** which sets out the approach for the assessment. The assessment matrix confirms the assessment that the value of these assets is considered very low to low against an impact that is up to high which indicates an effect on significance that is slight, not significant, less than

		substantial harm as set out within tables 8.8 and 8.9 of the **Chapter 8 Cultural Heritage (APP-059)** in the ES.
9.18	The Council consider that the assessment should adopt a group-value methodology, recognising harm to the character and coherence of the historic farmstead network. Specific non-designated receptors include but are not limited to: • Westmorelands/Asgarby Fen Farm (MLI121926) – views to the north and west will be compromised, altering setting • Gashes Barn (MLI121916) • Villa Farm, Bicker (MLI116632) – located within the order limits and therefore particularly vulnerable, with no clear bespoke mitigation identified in the ES • Poplar Tree Farm (MLI116633) – outside the order limits but with altered views from the north and south-east affecting setting • Unnamed Farmstead, Ewerby and Evedon (MLI121913)	The application of Tables 8.2-8.4 presented in **Chapter 8 Cultural Heritage (APP-059)** during the assessment of impacts provides for the proportionate weighting of an assets' significance in the understanding of overall impact. Table 8.9 clearly assigns a 'Low' level of importance to the farmsteads which are classified as such due to their non designated status reflecting their limited architectural and historic interest. This provides for their correct level of weighting in the assessment of impact. There is no guidance or mechanism to inflate the weight provided in respect to the assets when considered as a group – i.e. group value would not provide for a greater level of importance in the determination of impact. The Applicant, therefore, disagrees that sufficient weighting has not been given. To confirm it is considered appropriate that these assets have been assessed individually. This is essentially a rural 19th century landscape, and the proposed development is designed to sit within that landscape respecting the historic field pattern and historic route ways associated with that landscape. The physical attributes of the non-designated assets have not been impacted or the immediate setting, this has been preserved by the design and will be enhanced by the embedded mitigation measures set out within **Appendix 2.3 Embedded Mitigation (APP-076)**. This supports **Appendix 8.2 Heritage Assessment (APP-118)** which sets out the approach for the assessment. The assessment matrix confirms the assessment results that the value of these assets

		is considered very low to low against an impact that is up to high which indicates an effect on significance that is slight and not significant, as set out within tables 8.8 and 8.9 of **Chapter 8 Cultural Heritage (APP-059)** in the ES. The embedded mitigation measures are bespoke to each asset and have been proposed to minimise the level of harm to the non-designated assets set out within **Appendix 2.3 Embedded Mitigation (APP-076)**. Although an adverse effect is noted for these assets (following NPPF) that effect must be considered within the planning balance and the public benefit from increased renewable energy supply.
9.19	Other farmsteads within the ES mapping (Figures 8.1.2 (APP-244) and 8.2 (APP-245)) may also warrant inclusion where their setting, visibility and shared associations contribute to the historic agricultural landscape.	The Applicant does not agree that other non-designated farmsteads, in excess of those set out above, would require assessment. This is in acknowledgement that their level of importance would never exceed low. Even if a magnitude of impact of high was identified a reasonable assumption on the significance of effect would be that slight adverse impacts only would be identified in the worst case. No significant impacts would therefore be predicted.
9.20	**Overall Assessment** The development will result in adverse impacts on the setting of designated and non-designated heritage assets. While this is broadly recognised in the ES, insufficient weight has been given to the impacts on Asgarby Hall, Boughton House, Austhorpe Farm, Thorpe House, the Howell cluster, Kyme Tower and the identified farmsteads. The significance and special interest of these assets will be eroded by the change in landscape character arising from the solar farm and associated infrastructure. Greater weight should be given to these impacts in decision-making. In line with NPPF paragraphs 212–216, any harm	In all instances the application of Tables 8.2-8.4 presented in **Chapter 8 Cultural Heritage** (**APP-059**) during the assessment of impacts provides for the proportionate weighting of an assets' significance in the understanding of overall impact. The Applicant therefore contests that the appropriate weight hasn't been applied in the assessment of impacts. In all instances each asset has been provided the correct weight in the matrix of assessment. In respect to the effects identified and in reference to policy, it is for the decision maker to provide the correct level of weight in the balancing of public benefit.

	to heritage assets requires clear and convincing justification. Less than substantial harm must still be weighed against the public benefits, but that balance must give considerable importance and weight to the desirability of preservation. Reliance on the current embedded mitigation is not adequate; a bespoke strategy is needed for the above-named assets, informed by further assessment and consultation with stakeholders.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
9.21	This position follows national policy. The NPPF requires that great weight be given to the conservation of heritage assets, that harm (whether substantial or less than substantial) be clearly and convincingly justified, and that non-designated assets are afforded appropriate weight (NPPF paragraph 216). NPS EN-1, paragraphs 5.9.1–5.9.36 emphasises that the significance of heritage assets derives not only from their physical presence but also from their setting (para.,5.9.3), and that any harm should or loss of significance should require clear and convincing justification (para.,5.9.28). NPS EN-3 requires applicants to give careful consideration to siting and design (para., 2.10.118), including the cumulative impacts of solar development and to minimise harm to landscape character and any sensitive visual receptors (para., 2.10.157). The Council concludes that the ES underestimates the scale of harm to several designated and non-designated receptors, particularly where the contribution of setting and group value has been overlooked. Further assessment and bespoke mitigation are required if the proposal is to be considered compliant with national policy.	This comment has been noted by the Applicant, and it is set out within section 8.6 **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.2 Heritage Assessment (APP-118)**. The Applicant contests the assertion that harm has been underestimated and reiterates that additional information sourced during site observations with consultees on the 5 September 2025 confirms the conclusions of the ES. 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. The assessment has taken into consideration the impact on the physical attributes of the heritage assets, the indirect effect on immediate setting and the indirect effect on the wider setting. The assessment has therefore considered that the effect on the significance of the heritage assets is resultant from the introduction of change to the wider setting.

		This is further supported by **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, by introducing a new permissive path, reinstating a historic route. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
9.22	Based on the information submitted at this stage the Council are of the opinion that the proposal would result in harm to built heritage assets. This harm has not been convincingly justified and further assessment and mitigation will be required to demonstrate compliance with planning policies for the historic environment.	The Applicant reiterates that all impacts have been assessed correctly in accordance with policy and guidance and that additional information sourced during site observations with consultees on the 5 September 2025 confirms the conclusions of the ES. Public benefits through public outreach are set out within **Appendix 8.2 Heritage Statement (APP-118)**. Other public benefits of the Proposed Development are set out in Section 7 the **PS (APP-277)**. In summary, urgent and unprecedented actions are required on a global scale to halt climate change. A rapid increase in the supply of low carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation and battery storage are a critical part of the UK's strategy to achieve net zero by 2050, a key step towards which is the government's national mission for 'Clean Power by 2030'. The Proposed Development is capable of

connecting to the grid before 2030. These benefits are considered to provide a clear and convincing justification and as such, paragraph 5.9.28 of EN-1 is considered to be complied with.

The assessment has been caried out following Historic England guidance as accepted practice as set out within **The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition),** which follows closely NPPF which assessed setting as part of a 5-point staged assessment. Step 1 identified the assets likely to be affected. Step 2 Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. Step 3 Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it. Step 4 Explore ways to maximise enhancement and avoid or minimise harm. Step 5 Make and document the decision and monitor outcomes. This process has been undertaken for all heritage assets brought forward for assessment and set out within section 5 of **Appendix 8.2 Heritage Statement (APP-118)** and within section 8.6 to 8.9 of the Chapter 8 Cultural Heritage (APP-059) in the ES. Step 4 is set out within **Appendix 2.3 Embedded Mitigation (APP-076)** and Step 5 is set out within **Appendix 8.2 Heritage Statement (APP-118)** and addressed within **Chapter 8 Cultural Heritage (APP-059)** in the ES.

In relation to 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 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 **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 constraints 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.

		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, buffer zones, infilling of existing boundaries and retention of field formations, this would further reduce harm during the operational phase. The embedded mitigation measures are bespoke and are flexible 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).**
9.23	**Archaeology** As stated in our Relevant Representation response, the Council acknowledges the Applicant's assessment work to date and confirm that it is satisfied that the work 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. It has allowed the early identification of any issues and opportunities to allow easy incorporation of solutions into the programme and production of a fit for purpose archaeological mitigation strategy.	This comment is noted and welcomed by the Applicant.
9.24	Consultation and communication between the Applicant and the Council has been effective and timely, with feedback and comments incorporated into the documents throughout the process. This has benefitted the archaeological assessment, improved the methodology employed and enhanced the final output.	This comment is noted and welcomed by the Applicant.

9.25	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 APP-059 and Appendix 8.1 Archaeological Desk Based Assessment APP-117 . These have been completed to the required level, utilising the appropriate sources and to the appropriate standards set out by the Chartered Institute for Archaeologists, Historic England and guidance within the Lincolnshire Archaeological Handbook3 (Lincolnshire County Council 2024).	This comment is noted and welcomed by the Applicant.
9.26	The desk-based assessment has been accompanied by aerial investigation and mapping survey (Aerial and LiDAR Assessment – Solar Array Document APP-119 and Aerial and LiDAR Assessment – Access and Cable Routes Document APP-120) 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), which have been completed to the appropriate standards.	This comment is noted and welcomed by the Applicant.
9.27	These desk-based and non-intrusive surveys, particularly the aerial investigation and mapping and the geophysical survey, have facilitated a comprehensive understanding of the landscape within which the Beacon Fen Energy Park and associated connection infrastructure is proposed. This has allowed the proposed scheme to identify and design out potential impacts at an early stage and inform the intrusive trenching evaluation strategy. This benefits archaeology through removal of the source of harm and reduces the financial costs to the Applicant.	This comment is noted and welcomed by the Applicant.

9.28	The programme of trenching for the main solar array area has been completed (Appendix 8.10 Trial Trenching Report - Solar Array APP-150 and APP-151) and substantial parts of the access route trenching has been done (Appendix 8.10b Trial Trenching Report - Targeted Area on the Access Route APP-152).	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been produced in consultation with LCC to ensure harm is kept to a minimum.
9.29	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.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been produced in consultation with LCC.
9.30	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.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been produced in consultation with LCC.
9.31	The archaeological assessment therefore fulfils the requirements set out within the NPS EN1 (Section 5.8), the NPPF and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states that *"The EIA must identify, describe and assess in an appropriate manner…the direct and indirect significant impacts of the proposed development on…material assets, cultural heritage and the landscape."* (Regulation 5 (2d)).	This comment is noted and welcomed by the Applicant. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

9.32	The methodological approach employed for Beacon Fen Energy Park utilises the Rochdale Envelope (Chapter 4 – Scope & Methodology Document APP-055 Section 4.3). Where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and proportionate mitigation. The Beacon Fen Energy Park project has completed this to the satisfaction of LCC through appropriate and adequate trenching evaluation of the full impact zone and the timely provision of the results to inform the baseline evidence which has been used to create a fit for purpose mitigation strategy in advance of the DCO submission.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been produced in consultation with LCC.
9.33	The draft archaeological mitigation strategy has been provided to the Council for comment, in advance of the submission of DCO (Appendix 8.11 Archaeological Mitigation Strategy Document APP-153.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been produced in consultation with LCC and agreed for Deadline 2.
9.34	The archaeological mitigation strategy 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 mitigation requirements have been set out by field, including the prior survey works, assessment of significance and type of mitigation required.	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has been produced in consultation with LCC.
9.35	The archaeological mitigation strategy sets out the requirements and scope of works for further archaeological intervention, with site and task-specific Written Schemes of	This comment has been noted by the Applicant, and it is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. **Appendix 8.11 Archaeological Mitigation**

	Investigation being produced by the Applicant and approved by the Council.	**Strategy (APP-153)** has been produced in consultation with LCC.
9.36	The updated archaeological mitigation strategy has been submitted to the Council, which has addressed the comments we had raised on the earlier draft. This includes a section specifically covering public engagement and outreach; public benefit is a key component of archaeological work and had been omitted from the initial draft.	**Appendix 8.11 Archaeological Mitigation Strategy (APP-153**) has incorporated the requested additions.
9.37	Where further trenching is proposed within areas where access was not possible previously, this will occur post-DCO. The Council is content for this to occur at that stage. The archaeological mitigation strategy contains the required mechanisms for updating the scope of mitigation to incorporate new areas of archaeological interest, should they be encountered during the next phase of trenching.	This comment has been noted by the Applicant, and it is set out within the **Archaeological Mitigation Strategy (APP-153)**.
9.38	The draft DCO wording for Requirement 11 is appropriate and acceptable to the Council.	The Applicant notes this comment and welcomes it.
9.39	Notwithstanding the substantial level of assessment undertaken to date, both non-intrusive and intrusive, alongside the proposed mitigation that the Applicant has committed to, the Applicant considers the magnitude of impact following said mitigation will be slight adverse, a conclusion that the Council agrees with. Although the ability to preserve archaeological remains *in-situ* is proposed for a number of locations where significant	The Applicant welcomes this comment. No further response is necessary.

	remains have been found, there are other areas where the mitigation is preservation by record, meaning the archaeology would be lost, albeit that a record would be created prior to this loss. There would be some elements of enhancement of the archaeological record within the site, namely via the research value of the excavated material, public archaeology and community engagement programme and dissemination of results. This would not fully offset the loss of archaeology but would certainly contribute to furthering the understanding of the historic environment within this part of Lincolnshire and increase the public benefit derived from scheme. Therefore, the Council agrees with the conclusion within ES Volume 1, 6.2.8 Chapter 8 Cultural Heritage that the residual impact following mitigation would be slight adverse. As such the development would have a **negative** impact on archaeology.	
10	**Access and Traffic**	
10.1	Paragraph 5.14.18 of EN-1 sets out that the SoS should consider the substantial impacts of traffic and therefore should ensure 'that the applicant has sought to mitigate these impacts, including during the construction phase of the development'. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the SoS should consider requirements to mitigate adverse impacts on the transport networks arising from the development. Development consent should not be withheld where applicants are willing to enter planning obligations for funding infrastructure or where requirements can be imposed mitigating adverse impacts (paragraph 5.14.20).	The Applicant acknowledges this statement. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

10.2	Paragraph 5.14.14 of EN-1 states that the SoS may attach requirements to a consent where there is likely to be substantial HGV traffic that control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements, make sufficient provision for HGV parking including to avoid prolonged queuing on approach roads and ensuring satisfactory arrangements for reasonably foreseeable abnormal disruption.	The Applicant acknowledges this statement. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
10.3	The NPPF at paragraph 116 states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."	The Applicant acknowledges this statement. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
10.4	Local Policies: • CLLP Policy S47: Accessibility and Transport • SELLP Policy 3: Climate Change and Renewable and Low Carbon Energy • SELLP Policy 33: Delivering a More Sustainable Transport Network	The Applicant acknowledges this statement. The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
10.5	CLLP Policy S47 (Accessibility and Transport) states that development proposals are required to contribute towards an efficient and safe transport network. All developments should demonstrate, where appropriate, that they have regard to the need to minimise additional travel demand through the use of travel planning, safe and convenient public transport, walking and cycling links, and integration with existing infrastructure. This policy also states that any development that has severe transport implications will not be granted planning permission unless deliverable	The Applicant acknowledges this statement. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

	mitigation measures have been identified, and arrangements secured for their implementation, which will make the development acceptable in transport terms.	
10.6	SELLP Policy 31 (Climate Change and Renewable and Low Carbon Energy) states that development of renewable energy facilities and associated infrastructure will be permitted provided, individually, or cumulatively, there would be no significant harm to highway safety (including public rights of way).	The Applicant acknowledges this statement. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
10.7	SELLP Policy 33 (Delivering a More Sustainable Transport Network) states that Local Planning Authorities will work with developers to make the best use of, and seek improvements to, existing transport infrastructure and services within, and connecting to South East Lincolnshire. Development proposals are required to have regard to the need for better promotion and management of the existing transport network and the provision of sustainable forms of transport. In addition, this policy states that existing footpaths, cycle routes, and particularly public rights of way, will be protected from development.	The Applicant acknowledges this statement. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
10.8	The Applicant's assessment of the likely effect of the proposed development on access and traffic are set out in ES Volume 1, Chapter 9 (Access and Traffic) (APP-060) and Appendix 9.1 Transport Assessment (TA) (APP-155 - 157). These documents consider the potential for likely significant effects of severance to communities, effects of increased traffic, amenity and safety of motorised and non-motorised road users. The assessment considers how the development could cause changes in traffic numbers and vehicle types on local and the strategic road network as	Within **Chapter 9 Access and Traffic (APP-060)** of the Environmental Statement (ES), Table 9.11 Construction Traffic Generation quantifies the Construction Traffic Generation of the Proposed Development on the local highway network and confirms that the anticipated additional HGV traffic two-way Annual Average Daily Traffic (AADT) on A17 is 36, not 38 as stated in the LCC response.

	well as the impact on road users including pedestrians. The greatest impacts are likely to occur during the construction phase. The A17 has been identified as the principal and busiest road in the vicinity of the site. Construction access to the site would predominately be from the A17 via a dedicated bespoke access road, with a left in left out arrangement. During construction the development would be anticipated to generate an additional 168 vehicles (including 38 HGV's) per day on the A17, amounting to a 0.9% increase. On minor local roads (Carterplot Road and Great Hale Drove) there would be an anticipated additional 7 vehicles (including 5 HGV's) per day on average.	
10.9	The Applicant has proposed monitoring and incorporated mitigation measures into the design of the scheme, and these would be set out in the detailed Construction Traffic Management Plan (CTMP) that would be secured through a requirement and subject to approval by the County Council; an outline CTMP (APP-159) has been submitted with the DCO application. The applicant's assessment concludes that the access and traffic effects of the proposed development during construction would be negligible, and not significant. Operational phase impacts are considered not likely to be significant due to negligible traffic flows. Decommissioning phase impacts the potential effects and mitigation would be similar to construction but likely at a lower level of intensity.	The Applicant acknowledges this statement.
10.10	The Applicant has also provided an assessment of the potential cumulative effects of traffic and transport with other projects and concludes that no significant Inter-Cumulative effects would arise.	The Applicant acknowledges this statement.

10.11	The Council in its capacity as Local Highway Authority has reviewed the application documents and has been involved in meetings with the Applicant pre-submission of the DCO application. The Council's position on highway matters remains as stated in our relevant representation (RR-002).	The Applicant can confirm that this statement is addressed in **Applicant Responses to Relevant Representations (Document Ref: 9.2)** An online meeting was held with Lincolnshire County Council (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 Note 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 Note was updated in October 2025 to reflect the outcome of the meeting with LCC. The Technical Note response to LCC's Relevant Representation Note is submitted as an Appendix to **9.2 Applicant Responses to Relevant Representations (Document Ref: 9.2)** submitted at Deadline 1. Following the meeting and reaching agreement with LCC on outstanding matters, it is concluded that the Relevant Representation is resolved.
10.12	In summary, the methodology for the Transport Assessment was agreed with the Council, it provides a reasonable estimate of construction traffic that would be associated with the development. The Local Highway Authority do not expect capacity issues on the highway network as result of this development.	The Applicant acknowledges this statement.

10.13	The main access to the development site would be via a new haul road from the A17, thereby avoiding minor roads. Some traffic to Compounds 3 & 4 would use Carterplot Road and Great Hale Drove, which are narrow roads requiring mitigation through passing places. A similar approach to that proposed in the solar farm application on land south of Little Hale Drove (NKDC Ref: 23/1021/FUL), which was granted consent on appeal on 13 August 2025 (APP/R2520/W/25/3363027), would be expected by the Highway Authority. The applicant has since provided Transport Technical Note dated August 2025 detailing construction traffic volumes on these, and due to the very low numbers the Highway Authority accepts that passing places are not needed on Great Hale Drove and the existing passing places on Carterplot Road would be adequate.	The Applicant acknowledges this statement and confirms that the Technical Note was updated in October 2025 to reflect the outcome of the meeting with LCC. The Applicant liaised with LCC to obtain agreement to the updated document. The Technical Response to LCC's Relevant Representation Note is submitted as an Appendix to **Applicant Responses to Relevant Representations** (**Document Ref: 9.2)** submitted at Deadline 1. Following the meeting and reaching agreement with LCC on outstanding matters, it is concluded that the Relevant Representation is resolved and is reflected in the Statement of Common Ground (SoCG) with LCC submitted at Deadline 1. 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 (Document Ref: 3.1)**. LCC will therefore be consulted on the detail to be included within the CTMP.
10.14	Access layouts and visibility splays are provided in Appendix E of the TA. Section 184 applications under the Highways Act will be needed if the DCO is granted.	The Applicant can confirm that this statement is addressed in **Applicant Responses to Relevant Representations** (**Document Ref: 9.2**). 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 (Document Ref: 3.1)** for the Construction Traffic Management Plan (CTMP) (as

		secured via Requirement 13 of the **Draft DCO (Document Ref: 3.1)**) to be approved by LCC.
10.15	The outline CTMP (APP-159) outlines operational hours, routing, inspections, parking, wheel washing, and AIL delivery. All measures will be required and need to be monitored and must be enforceable to uphold the TA assumptions. Access works and mitigation included in the CTMP must be approved by the Council's Section 184 team and Section 278 minor works team. CTMP should reference the need for future technical approvals. This would be controlled through requirement 13 in the draft DCO (APP-039) which requires the CTMP to be approved by the Council.	The Applicant can confirm that this statement is addressed in **9.2 Applicant Responses to Relevant Representations** (**Document Ref: 9.2**). 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 (Document Ref: 3.1)** for **Appendix 9.3 Outline Construction Traffic Management Plan (oCTMP) (APP-159)** (as secured via Requirement 13 of the **Draft DCO (Document Ref: 3.1)**) to be approved by LCC.
10.16	The draft DCO (APP-039) lacks reference to the Council's Permitting Scheme. The Council would expect similar provisions as in other DCOs (e.g. Viking CCS4). Subject to the necessary mitigations being secured and implemented, the Council concludes that access and traffic impacts of this development during all phases of the development would be **neutral**.	The Applicant can confirm that this statement is addressed in **9.2 Applicant Responses to Relevant Representations** (**Document Ref: 9.2**). For the avoidance of doubt, the **Draft DCO (Document Ref: 3.1)** 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 18 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 18. 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.
10.17	In terms of the cumulative effects, the Highway Authority consider from a traffic capacity aspect, there is currently adequate capacity in the A17 and A15. Key junctions at Holdingham Roundabout and Rugby Club junction A153/A17 have recently been upgraded by LCC and there are no critical pinch points which are likely to be impacted by this scheme and other developments in this area and therefore no significant cumulative access and traffic effects are anticipated as a result of this development. However, table 5.2 (Cumulative Schemes Summary) of Appendix 9.1 (APP-157) requires updating in line with our comments in section 17 (Cumulative effects) of this LIR.	The Applicant acknowledges this statement. The Applicant confirms that Table 5.2 (Cumulative Schemes) of **Appendix 9.1 Transport Assessment (TA) (APP-157)** will be updated to reflect the comments made in this LIR relating to Cumulative Effects. The updated document will be submitted at Deadline 2.
11	**Water Resources and Flood Risk**	
11.1	Section 5.16 of NPS EN-1 focuses on water quality and resources. In the decision-making process, the SoS should note that activities that discharge to the water environment are subject to pollution control. Moreover, the SoS will '*need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework (Water Framework Directive) (England and Wales) Regulations 2017'* (paragraph 5.16.12).	The Applicant has reviewed this statement. **Appendix 11.6 Water Framework Directive Assessment (APP-167)** of the Environmental Statement (ES) concludes that the Proposed Development is unlikely to include any activities that are likely to cause deterioration in the Water Framework Directive (WFD) status for the surface and ground water or prevent the water bodies from achieving its WFD objectives, provided that best practice and established guidance are adhered to. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

11.2	EN-1 also states that the SoS should consider '*whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary*' to mitigate adverse effects on the water environment (paragraph 5.16.16).	The Applicant considers that Requirements 5, 10, 12 and 18 included in the **Draft DCO (Document Ref: 3.1)** are appropriate to mitigate adverse impacts on the water environment. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
11.3	Paragraph 5.8.7 of EN-1 notes that new energy infrastructure should only be permitted by exception in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), and that it should be safe for its lifetime without increasing flood risk elsewhere and, where possible, should reduce flood risk overall. It should also be designed and constructed to remain operational in times of flood. Paragraphs 5.8.9 and 5.8.10 confirm the requirement for the flood risk sequential and exception tests to be applied.	The Sequential Test has been applied as referenced in Section 4.4 of the Site Selection Report (SSR) which is Appendix 2 of the **PS (APP-277). Appendix 11.1 Flood Risk Assessment (APP-162)** of the Environmental Statement (ES) applies the second part of the Exception Test, confirming how mitigation has been embedded into the design of the Proposed Development and detailing the additional mitigation measures that are required to ensure that the Proposed Development will remain operational in times of flood and will be safe for its lifetime, without increasing the risk of flooding elsewhere. This is secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
11.4	NPS EN-3 paragraph 2.10.154 advises that "water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management."	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

11.5	Local Policies: • CLLP Policy S12: Water Efficiency and Sustainable Water Management • CLLP Policy S14 - Renewable Energy • CLLP Policy S21: Flood Risk and Water Resources • CLLP Policy S59: Green and blue infrastructure network • SELLP Policy 2: Development Management • SELLP Policy 3: Design of New Development • SELLP Policy 4: Approach to Flood Risk • North Kesteven Flood Risk Assessment (2009 Revision Report)	The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
11.6	CLLP Policy S12 (Water Efficiency and Sustainable Water Management) states that in addition to the wider flood and water related policy requirements of policy S21, all residential or other development comprising new buildings with outside hard surfacing, must ensure such surfacing is permeable (unless there are technical and unavoidable reasons for not doing so).	The Applicant has reviewed this statement and confirms that the Outline Drainage Strategy (Section 8 **of Appendix 11.1 Flood Risk Assessment (APP-162)**) of the Environmental Statement (ES) adopts the use of Sustainable Drainage Systems (SuDS) including permeable surfacing. The surface water drainage scheme is secured pursuant to Requirement 10 of the **Draft DCO (Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
11.7	CLLP Policy S14 (Renewable Energy) states that proposals for renewable schemes, including ancillary development, will be supported where the direct, indirect, individual, and cumulative impacts of development on flood risk are, or can be made, acceptable. There are no further references to flood risk under the 'additional matters for solar based energy proposals' subheading of this policy.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

11.8	CLLP Policy S21 (Flood Risk and Water Resources) states that all development proposals will be considered against the NPPF, including application of the sequential and, if necessary, the exception test. Proposals should demonstrate that they are informed by and take account of the best available information from all sources of flood risk and by site specific flood risk assessment where appropriate; that the development will be safe during its lifetime taking into account the impacts of climate change; how the wider scope for flood risk reduction has been positively considered; and that they have incorporated Sustainable Drainage Systems (SuDS)/Integrated Water Management into the proposals, unless they can be shown to be inappropriate.	The Applicant has reviewed this statement and confirms that **Appendix 11.1 Flood Risk Assessment (APP-162)** of the Environmental Statement (ES) is based on the best available information including but not limited to bespoke fluvial flood modelling and UKCP18 climate change data. **Appendix 11.1 Flood Risk Assessment** demonstrates that, with appropriate mitigation measures in place, the Proposed Development will be safe for its lifetime and not increase flood risk elsewhere. Section 8 of **Appendix 11.1 Flood Risk Assessment** adopts the use of Sustainable Drainage Systems (SuDS) in the outline surface water drainage strategy. This is secured pursuant to Requirement 10 of the **Draft DCO (Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
11.9	CLLP Policy S59 (Green and Blue Infrastructure Network) states that proposals that cause loss or harm to the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts.	The Applicant has reviewed this statement and confirms that the surface water drainage strategies for the Solar Array Area, Cable Route Corridor and Bespoke Access Road as outlined in Section 8 of **Appendix 11.1 Flood Risk Assessment (APP-162)** of the Environmental Statement (ES) will make use of sustainable green and blue Sustainable Drainage Systems (SuDS) options where feasible to minimise impact on the wider downstream networks. The surface water drainage scheme is secured pursuant to Requirement 10 of the **Draft DCO (Document Ref: 3.1)**. The Applicant has based **Figure 31.1 Landscape Strategy Plan (APP-233** to **APP-235**) on enhancements to the green and blue infrastructure, including hedgerow enhancement, buffers along watercourses and creation of wildflower meadows. This is intended to strengthen ecological

		connectivity throughout and offsite. These enhancements are secured in **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** secured pursuant to Requirement 7 of the **Draft DCO (Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
11.10	SELLP Policy 2 (Development Management) states that proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to any impact upon sustainable drainage and flood risk. Similarly, SELLP Policy 3 (Design of New Development) states that development proposals will be required to demonstrate, where relevant, how the mitigation of flood risk through flood-resilient design and SuDS will be secured.	The Applicant has reviewed this statement and confirms that flood resilience will be incorporated into the design of the development to ensure that it remains operational during times of flooding. The flood resilient design is secured pursuant to Requirement 5 of the **Draft DCO (Document Ref: 3.1)**. The proposed surface water drainage scheme adopts the use of Sustainable Drainage Systems (SuDS). This is secured pursuant to Requirement 10 of the **Draft DCO (Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
11.11	SELLP Policy 4 (Approach to Flood Risk) states that development proposals within an area at risk of flooding (Flood Zones 2 and 3) will be permitted where the application is supported with a site-specific flood risk assessment, covering risk from all sources including the impacts of climate change, and which: • Demonstrates that the vulnerability of the proposed use is compatible with the flood zone; • Identifies the relevant predicted flood risk level, and mitigation measures that demonstrates how the development will be made safe; • Incorporates the use of SuDS (unless it is demonstrated that this is not technically feasible)	The Applicant has reviewed this statement and confirms that **Appendix 11.1 Flood Risk Assessment (APP-162)** of the Environmental Statement (ES) addresses all items of South-East Lincolnshire Local Plan 2011-2036 (SELLP) (adopted March 2019) Policy 4. The Flood Risk Assessment (FRA) confirms that the Proposed Development will remain safe for the life of the project, incorporating the use of Sustainable Drainage Systems (SuDS). This is secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

	and confirms how these will be maintained/managed for the lifetime of development; • Demonstrates that the proposal will not increase risk elsewhere and that opportunities through layout, form of development and green infrastructure have been considered as a way of providing flood betterment and reducing flood risk overall; and • Ensures suitable access is safeguarded for the maintenance of water resources, drainage, and flood risk management infrastructure.	
11.12	ES Volume 1, Chapter 11 (Water Resources and Flood Risk)(APP-062), Appendix 11.1 Flood Risk Assessment (FRA) (APP-0162) and ES Volume 2, Appendix 11.6 Water Framework Directive Assessment (APP-167), considers the likely effects generated by the proposed development during construction, operation (including maintenance), and decommissioning in relation to the impact of the development on water resources and flood risk, in particular the potential for likely significant effects of changes to water quality and the hydrological regime.	The Applicant has reviewed this statement and considers that no response is required.
11.13	The site is located within the South Forty Foot Drain surface water catchment and falls within the Black Sluice Internal Drainage Board (IDB) area. It contains several water features, including Main Rivers, Ordinary Watercourses, and IDB-managed drains. The underlying bedrock geology is not considered a groundwater resource. There are 22 licensed surface water abstraction points downstream of the site. At approximately 100 metres below ground level, the Lincolnshire Limestone Formation (a Principal Aquifer) is present.	The Applicant has reviewed this statement and considers that no response is required.

11.14	A FRA has been prepared for this development as it is partly located within flood zones 2 and 3, flood zone 3 areas are primarily concentrated in the eastern and central parts of the Solar Array Area and parts of the Cable Route Corridor. The FRA assesses the development against the risk of flooding, from multiple sources and concludes that the risk of flooding to the Proposed Development from fluvial, surface water, groundwater and artificial sources varies across the Site. Eastern areas of the Solar Array Area and southern portions of the Cable Route Corridor are located within fluvial Flood Zone 3 (i.e., High risk). These areas are also at risk of reservoir flooding.	The Applicant agrees with the summary of the baseline flood risk provided by Lincolnshire County Council (LCC) in this statement and has no further comment to make.
11.15	The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal. In terms of surface water flood risk, the LLFA agrees with the applicant's conclusion that the flood risk from this development would be low. The bespoke haul road would require mitigation, however, subject to the development being carried out as proposed within the DCO application documents and the outlined mitigation measures being designed, implemented and secured in the DCO, the Council as LLFA for Lincolnshire, consider the surface water flood risk from the development would be acceptable and that impact would be **neutral.**	This comment has been reviewed by the Applicant and confirms that appropriate mitigation for surface water management will be secured by Requirement 10 of the **draft DCO (Document Ref: 3.1)**.
11.16	**Sequential Test** Paragraph 5.8.21 of EN-1 requires a Sequential Test to be followed to ensure that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Even where a flood risk assessment shows the development can be made safe	The Sequential Test is considered in the Site Selection Report at Appendix 2 of the **PS (APP-277)** and **ES Appendix 11.1 Flood Risk Assessment (APP-162)**.

	throughout its lifetime without increasing risk elsewhere, the Sequential Test still needs to be satisfied. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites: within medium risk areas; and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.	
11.17	Planning Practice Guidance (024 Reference ID: 7-024-20220825) states that 'If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied'. Planning Practice Guidance Paragraph: 027 Reference ID: 7-027-20220825 also states that 'For nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary.' and that 'Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available''.	The Sequential Test is considered in the Site Selection Report at Appendix 2 of the **PS (APP-277)** and **ES Appendix 11.1 Flood Risk Assessment (APP-162)**.
11.18	The applicant concludes that the Sequential Test has been passed, as set out in the FRA (paragraphs 2.1.8 and 2.2.8) and the Site Selection Report (SSR) (Appendix 2 APP-277) (paragraph 5.1.7). The principles of site selection adopted by the applicant are set out in Chapter 2 of the SSR.	The Sequential Test is considered in the Site Selection Report at Appendix 2 of the **PS (APP-277)** and **ES Appendix 11.1 Flood Risk Assessment (APP-162)**.
11.19	The current methodology appears to exclude land where there is no willing landowner—specifically, sites not available through voluntary commercial agreements, as opposed to those that might be acquired via compulsory purchase (SSR paragraphs 2.1.3 and 2.2.5). A wider search area above the 10km radius from the Bicker Fen substation also does not appear to have been considered, which the applicant states is based on viability and	While the methodology in the Site Selection Report at Appendix 2 of the **PS (APP-277)** does not exclude land where there is no willing landowner, at Stage 4 (Evaluation of Potential Alternative Sites) it is included as a constraint that makes a site less preferable due to the additional costs and time associated with seeking compulsory purchase of large areas of land as opposed to working with a willing landowner.

	therefore sites where the closest point does not fall within the 10km were not considered (SSR section 4.1)	
11.20	The applicant's methodology also excludes sites that are not considered to be continuous as increased cost would be likely and would impact viability (SSR paragraph 3.4.7). However, there are several other NSIP scale solar projects in Lincolnshire, some of which have had a DCO granted or are currently in examination that are non-continuous, such as Cottam, West Burton, One Earth and Springwell. The Council therefore questions the applicant's assertion that the site must be continuous for viability.	As set out in the Site Selection Report, at Appendix 2 of the **PS (APP-277**), the consider alternatives the Applicant sought continuous sites that were comparable to the Proposed Site. Continuous collections of non-continuous sites which when taken together cover an area greater than 300 ha were not considered as there would be likely increased costs in surveying, designing, screening, connecting and legally securing (with reference to land ownership) multiple separate sites which would impact viability and make them incomparable to the continuous Proposed Site. Though a non-continuous site may be viable in other circumstances, as non-continuous sites would be unable to serve the intended market of the Proposed Development as effectively, the Proposed Development is in accordance with the updated Planning Practise Guidance. Furthermore, this is in accordance with EN-1 at paras. 4.3.22 – 4.3.23, only alternatives that meet the objectives of the proposed development need be considered.
11.21	As such there is considered to be insufficient information/evidence provided in the Beacon Fen DCO application to properly interrogate the assertion that the sequential test has been passed with regard to site selection. Further evidence is therefore required to ensure the sequential and exception tests have been appropriately applied.	As set out in the responses to paragraphs 11.16 to 11.20, the Applicant considers that adequate information has been submitted to demonstrate that the sequential test has been passed with regards to site selection. Section 2.2 of **Appendix 11.1 Flood Risk Assessment (APP-162)** applies the second part of the Exception Test and confirms that with mitigation embedded into the design of the proposed development, it will remain safe and operational during the lifespan of the development with no increase in the risk of flooding to off-site

		areas. This is secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**.
12	**Soils and Agricultural Land**	
12.1	Local Policies • CLLP Policy S14: Renewable Energy • CLLP Policy S21: Flood Risk and Water Resources • CLLP Policy S67: Best and Most Versatile Agricultural Land • SELLP Policy 31: Climate Change and Renewable and Low Carbon Energy • LMWLP Policy DM12: Best and Most Versatile Agricultural Land.	The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
12.2	Under the subheading 'additional matters for solar based energy proposals', CLLP Policy S14 (Renewable Energy) states that proposals for ground-based photovoltaics and associated infrastructure, including commercial large scale proposals, will be under a presumption in favour unless, amongst other things, the proposal is (following a site specific soil assessment) to take place on BMV agricultural land and does not meet the requirements of Policy S67.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
12.3	CLLP Policy (Best and Most Versatile Agricultural Land) states that proposals should protect BMV agricultural land so as to protect opportunities for food production and the continuance of the agricultural economy. Significant development resulting in the loss of BMV agricultural land will only be supported if:	This statement has been reviewed and is noted by the Applicant. The Site Selection Report, as found within **Appendix 2 of the PS (APP-277)** and **Chapter 3 Alternatives and Design Evolution (APP-054)** of the Environmental Statement (ES) outline the various considerations and environmental factors that were taken into account and which informed the site selection process. As part of this, agricultural land quality and seeking to minimise

- The need for the proposed development has been clearly established and there is insufficient lower grade land available;
- The benefits and/or sustainability considerations outweigh the need to protect such land, when taking into account the economic and other benefits of the BMV agricultural land;
- The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and
- Where feasible, once any development which is supported has ceased its useful life, the land will be restored to its former use.

impacts on best and most versatile (BMV) land were key considerations in the Applicant's site selection process.

The Applicant identified that land close to the point of connection was typically subject to higher flood risks and / or higher ALC and sought land that was slightly more distant from the point of connection to minimise the extent of such land being used for solar generation. During the four-stage analysis, all of the alternative sites identified all presented similar or higher quantities of BMV in comparison to the Proposed Development.

It is also important to recognise that while ALC was an important consideration in site selection, it was one of several factors that were balanced to determine a favoured site. Given that the other sites identified by the Applicant during site selection displayed similar ALC qualities, this was not a determining factor in the choice of site location.

Chapter 14 Soils and Agricultural Land (APP-065) of the ES 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. Given the context of the quality of land locally and within the Order Limits, it has not been practicable to remove all BMV. However, the Proposed Development layout has been designed as to minimise the use of BMV land for hard standing and has been designed as to allow for reinstatement of land for agricultural use following decommissioning.

The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

12.4	SELLP Policy 31 (Climate Change and Renewable and Low Carbon Energy) states that the development of renewable energy facilities and associated infrastructure will be permitted provided, individually, or cumulatively, there would be no significant harm to agricultural land. Provision should be made for post-construction monitoring, and removal of the facility and reinstatement of the site if the development ceases to be operational.	This statement has been reviewed and is noted by the Applicant. **Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013 to REP1-014)** includes measures to ensure the protection of agricultural land and soils and includes requirements for ongoing monitoring of the site. Details of site restoration requirements are also provided. The oSMP is to be progressed into a detailed SMP at the detailed design stage; the detailed SMP is secured by the mechanism set out in requirement 16 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**: This requirement stipulates that no part of the authorised development may commence until a soil management plan (substantially in accordance with the Outline Soil Management Plan **Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013)** for that part has been submitted to and approved by the relevant planning authority. All construction works must be carried out in accordance with the approved soil management plan and maintained throughout the operation of the relevant part of the authorised development to which the plan relates. The requirement also stipulates that detailed soil management plans must be submitted prior to the date of final commissioning (relating to the operational phase of the authorised development) and prior to the start of any decommissioning works for any part of the authorised development (relating to the decommissioning phase of the authorised development). These follow up plans must also be substantially in accordance with the Outline Soil Management Plan **Chapter 14 Soils and Agricultural Land (APP-065)**. Supplementary to the above, Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3**

		Embedded Mitigation (APP-076)) details the mitigation measures (secured by the **Draft DCO**) to be implemented as part of the Proposed Development. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
12.5	NPS EN-1 at paragraph 5.11.12 provides similar advice that applicants should seek to minimise impacts on the BMV agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). Paragraph 5.11.34 of EN-1 states that the SoS "should ensure that applicants do not site their scheme on the BMV agricultural land without justification." Where it is sited on BMV, it should "take into account the economic and other benefits of that land" and where it is demonstrated necessary, areas of poorer quality should be preferred to higher quality land.	This statement has been reviewed and is noted by the Applicant. See response to 12.3, above.
12.6	Under the heading of 'Solar Photovoltaic Generation', paragraph 2.10.29 of the NPS EN-3 states that "'While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible."	This statement has been reviewed and is noted by the Applicant. See response to 12.3, above.

12.7	Paragraph 2.10.30 notes that 'Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 - 2.10.92 and 2.10.107 - 2.10.126.'	This statement has been reviewed and is noted by the Applicant; no response required. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
12.8	Paragraph 2.10.31 acknowledges that it is likely that applicants' developments may use some agricultural land, however that 'Applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.'	This statement has been reviewed and is noted by the Applicant. See response to 12.3, above.
12.9	Paragraph 2.10.145 reiterates that the SoS should take into account 'the economic and other benefits of the best and most versatile agricultural land' and that 'The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.'	This statement has been reviewed and is noted by the Applicant. See response to 12.4, above.
12.10	On 15 May 2024, a Written Ministerial Statement ("WMS") was published on solar infrastructure and protecting food security and BMV land. The Council notes that the 15 May 2024 WMS emphasises elements of the 2024 NPSs. In particular the 2024 WMS emphasises that when considering whether planning consent should be granted for solar development the cumulative impacts where several proposals come forward in the same locality should be considered, with the WMS specifically referencing these issues in Lincolnshire *'we are increasingly seeing geographical clustering of proposed solar developments in some rural areas, such as in Lincolnshire'.*	The Applicant notes the Written Ministerial Statement (WMS) as published by the Secretary of State for Energy Security and Net Zero on 15 May 2024 in relation to solar and protecting our Food Security and Best and Most Versatile (BMV) Land. The WMS makes reference to NPS EN-1, which came into force in January 2024 and states: "*due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. Applicants for Nationally Significant*

Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible."

The **Site Selection Report**, found at Appendix 2 of the **PS (APP-277)**, outlines that agricultural land quality, and seeking to minimise the impacts of the Proposed Development on BMV land, was a key consideration in the Applicant's site selection process for the Solar Array Area and the required Site access and grid connection requirements. The Applicant identified that land close to the point of connection was typically subject to higher flood risks and/or higher agricultural land classification and sought land that was slightly more distant from the point of connection to minimise the extent of such land being used for solar generation. During the four-stage analysis, all of the alternative sites identified all presented similar or higher quantities of BMV land in comparison to the Proposed Development site. It is also important to recognise that while ALC was an important consideration in site selection, in accordance with national policy, it was one of several factors which were balanced to determine a favoured preferred site. Given that the other sites identified by the Applicant during site selection displayed similar ALC qualities, this however was not a determining factor in the choice of site location. Given that the other sites identified by the Applicant during site selection displayed similar ALC qualities, this however was not a determining factor in the choice of site location. Given that the other sites identified by the Applicant during site selection displayed similar ALC qualities, this however was not a determining factor in the choice of site location.

The embedded mitigations detailed within section 14.6 of **Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES) and the design alternatives

listed within section 3.6 of **Chapter 3: Alternatives and Design Evolution (APP–054)** of the ES sets out how the Applicant has sought to avoid and reduce the amount of BMV land used for hard infrastructure (that which involves sealing over the land, such as access roads or substation subbase) 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 remove all BMV land. However, the Proposed Development layout has been designed so as to minimise the use of BMV land for hard standing and has been designed as to allow for reinstatement of land for agricultural use following decommissioning. For example, as set out in Table 3.4 of ES **Chapter 3 Alternatives & Design Evolution (APP-054)**, in the siting of the Onsite Substation and BESS the option which resulted in the loss of lower value agricultural land was chosen.

This is also evidenced in the Applicant's **Bespoke Access Road Appraisal (APP-080)**, which sets out the extensive options appraisal carried out with respect to the Bespoke Access Road throughout the pre-examination process. Section 4 of this document sets out the appraisal of various different options, including taking account of Soils and Agriculture. As demonstrated in Table 1, Option 2, the Applicant's chosen option, is the only option to be considered green in the 'RAG' assessment, other options were considered to be red.

The WMS also sets out that the cumulative impact on loss of BMV should be considered where several proposals have come forward in the same locality. A cumulative impact assessment was undertaken as part of the assessment for **Chapter 14 Soils and Agricultural Land (APP-065)**, and **Chapter 18 Cumulative Effects (APP-069)**. Within this, inter-

		cumulative effects for agricultural land have been assessed. The majority of the considered developments are solar developments where most of the land take is considered to be temporary and reversible, with the permanent land take limited to areas of built development. The inter-cumulative impact is deemed to be moderate and, therefore is a significant impact, however, it should be noted that this is a temporary and reversible impact and land will retain its agricultural potential post restoration. In light of the above, it is considered that the Proposed Development accords with the aforementioned WMS.
12.11	The potential impacts on BMV agricultural land in respect of the Beacon Fen proposal and cumulatively with other projects (both NSIP and Town and Country Planning Applications (TCPA)) that are emerging/known about in Lincolnshire are of significant 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. This statement acknowledges that Lincolnshire has a high proportion of best and most versatile agricultural land, which is the basis for its prosperous agricultural industry. The Council will object to proposals on Grade 1, 2 and 3a agricultural land.	This statement has been reviewed and is noted by the Applicant. The Applicant has approached the siting of the Proposed Development in accordance with the NPS policy EN-3. This policy, as stated in paragraph 2.10.30, does not prohibit solar PV developments being sited on BMV land, but that the choice of site should be justified and BMV land avoided where possible. The responses provided to LCC LIR 12.3 and 12.10 provide details of how site selection and avoidance of BMV land has been approached to be in accordance with NPS policy. A cumulative impact assessment was undertaken as part of the assessment for **Chapter 14 Soils and Agricultural Land (APP-065),** and **Chapter 18 Cumulative Effects (ASS-069)**. Within this, inter-cumulative effects for agricultural land have been assessed. The majority of the considered developments are solar developments where most of the land take is considered to be temporary and reversible, with the permanent land take limited to areas of built development. The inter-cumulative impact is deemed to be moderate and,

		therefore is a significant impact, however, it should be noted that this is a temporary and reversible impact.
12.12	Lincolnshire has the largest combinable crop output of any UK county, with about 12% of England's arable crop area. The county's combination of climate, soil type and topography make the county ideal for a variety of crops with 437,591ha of land given over to agriculture and horticulture, 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, which in 2023 amounted to a total crop output of over £1,564 million and a total livestock output of £555 million.	This statement has been reviewed and is noted by the Applicant; no response required.
12.13	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. If this food supply chain is included alongside food retail and catering in the county, the number of employees exceeds 100,000.	This statement has been reviewed and is noted by the Applicant; no response required.
12.14	Landscope Consultants have been commissioned for the benefit of both NKDC and the Council to assist in the consideration and review the Agricultural land and Soils aspects of the Beacon Fen proposal. A full copy of the report prepared by Landscope is attached as an Appendix	This statement has been reviewed and is noted by the Applicant; no response required.

	2. Landscope has reviewed the DCO application documentation and the following summary and conclusions incorporates their comments, and should be read in conjunction with the full document.	
12.15	The ALC land surveyed represents a total area of 529 hectares and 45 hectares of the Bespoke Access Road Corridor.	This statement has been reviewed and is noted by the Applicant; no response required.
12.16	The results contained within the ALC reports are considered to be reliable, and have been undertaken by qualified professionals and in consultation with Natural England.	This statement has been reviewed and is noted by the Applicant; no response required.
12.17	The survey has informed the design of the outline Soil Management Plan (oSMP) (APP- 176) and considers construction, operation and decommissioning phases, as would be expected. The Council considers the oSMP to be broadly in line with national guidance.	This statement has been reviewed and is noted by the Applicant; no response required.
12.18	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.	This statement has been reviewed and is noted by the Applicant; no response required. The Cable Route Corridor will have a detailed Agricultural Land Classification (ALC) survey undertaken pre-construction to define the baseline soil and agricultural land quality to inform soil handling and storage measures within the detailed Soil Management Plan.
12.19	Chapter 14 (Soils and Agricultural Land) (APP-065) of the ES assesses the predicted impact on agricultural land for each area of the development, a Land Use breakdown for each area is provided in table 14.13. Solar Array Area - The total area involved is 529 ha of agricultural land, of this 395 ha is proposed for solar arrays during the 40-year lifespan	This statement has been reviewed and is noted by the Applicant; no response required.

	of the development. 11.69 ha is Grade 2, 180.02ha is subgrade 3a and 209.92 is Subgrade 3b. Land classified as BMV therefore amounts to 191 ha. This is considered to be a temporary loss due to the development's fixed duration. However table 14.13 indicates that 14.25 ha of BMV land would be permanently lost due to built infrastructure (e.g. access roads, compounds, BESS, substations).	
12.20	Bespoke Access Corridor – The total area involved amounts to 45ha of agricultural land. The provisional ALC data shows that this land is comprised entirely of Grade 3 agricultural land with a moderate likelihood of BMV; a small area has a high likelihood of being BMV in the southwest of the Bespoke Access Corridor Area. Table 14.13 indicates that 3.42 ha of BMV land in this area would permanently lost.	This statement has been reviewed and is noted by the Applicant; no response required.
12.21	Cable Route Corridor – The total area involved is 183ha, predominantly Grade 2 (145.73 ha) agricultural land, with portions of Grade 1 (28.18 ha) and Grade 3 (9.24 ha). The Cable Route Corridor shows a high and moderate BMV likelihood. Table 14.13 indicates that 2.7ha of BMV land (all grade 2) would be permanently lost.	This statement has been reviewed and is noted by the Applicant; no response required.
12.22	Over the whole development site, using the breakdown in table 14.13 the applicant's assessment indicates that overall, the proposed development would lead to the loss of 493.27 ha of agricultural land of which 277.3 ha would be BMV land (56%). This can be broken down to 20.37ha permanent loss and 256.93 ha temporary loss of BMV land (47%).	This statement has been reviewed and is noted by the Applicant; no response required.

12.23	The difference between Grade 3a and 3b agricultural land is however quite small and there is a degree of subjectivity about the difference, although the ALC findings are not disputed.	The Agricultural Land Classification (ALC) surveys and reporting followed the MAFF (1988) Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land and was conducted by suitably trained and experienced soil scientists. Strict methodology for surveying and data interpretation has been followed to ensure accurate reporting of ALC grades.
12.24	According to the Institute of Environmental Management & Assessment (IEMA) Guide 'A New Perspective on Land and Soil in Environmental Impact Assessment' (February 2022) *'the permanent loss, or reduction in quality, of more than 20ha of agricultural land due to development is of very high magnitude'* which is acknowledged as 'major' in paragraph 14.7.3 of ES Chapter 14.	This statement has been reviewed and is noted by the Applicant; no response required.
12.25	The Council is concerned that Table 14.13 does not quantify the loss of agricultural land, particularly BMV land, resulting from new green infrastructure and BNG measures within the solar array area and access corridor, both temporary and permanent.	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 the 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, the requirements of this restoration will be specified within the detailed SMP as stated in the oDEMP section 2.10: Soils and Agricultural Land, Mitigation Measures, **Appendix 2.5 Outline Decommissioning Environmental Management Plan (APP-078)**. 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. 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 Land Use Breakdown for the Proposed Development of the Site in Hectares within **Chapter 14 Soils and Agricultural Land (APP-065)**). Including the areas of green infrastructure in this case would result in overestimating the area temporarily removed from agricultural production.
12.26	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 revert to agriculture at the end of the operational period.	This statement has been reviewed and is noted by the Applicant. See response to comment 12.25, above.
12.27	In addition to the permanent loss of BMV agricultural land, which is considered a major impact, the Council is also concerned about the 'temporary' loss of approximately 257 hectares of BMV land for a period of 40 years. Given the duration, this represents a significant long-term reduction in productive BMV land and warrants serious consideration in the overall assessment of impacts, particularly cumulatively with other solar developments.	Adhering to the scope included within **Chapter 4 Scope and Methodology (APP-055)** of the Environmental Statement (ES) and utilising **Appendix 4.2 2 Cumulative Assessment Short List (APP-082)**, a cumulative impact assessment was undertaken as part of the assessment for **Chapter 14 Soils and Agricultural Land (APP-065),** and **Chapter 18 Cumulative Effects (ASS-069)**. Inter-cumulative effects for agricultural land have been assessed. When considering the impact of all considered developments (shown within Table 14.14 Construction Effects for Solar Array Area of Chapter 14) across the Lincolnshire County Council administrative area, 2% (11,962.85 ha) of all the agricultural land is involved of which 0.82% is (4,927 ha) best and most versatile (BMV) land. The majority of the considered developments are solar developments where most of the land take may be considered temporary and reversible, with the permanent land take limited to areas of built development. Assuming that embedded mitigation allows for reinstating these sites to agricultural

		production and that the soil resources are protected during all phases of the developments, the inter-cumulative impact is deemed to be moderate and, therefore, Significant. However, this is a temporary and reversible impact.
12.28	The 2024 UK Food Security Report5 identifies that 'Water and land, important agricultural inputs, are under increasing human and geopolitical competition and are being used at an unsustainable rate. The food system's essential natural resources continue to be depleted without being recovered for future use.' By reducing the amount of BMV land available by incrementally removing land for large infrastructure projects puts additional pressure on the remaining land to keep agricultural production supply stable, or alternatively more food will have to be imported with the sustainability implications of food miles and associated carbon emissions.	This statement has been reviewed and is noted by the Applicant. Potential impacts to the agricultural, energy and construction supply chains were not scoped in during Scoping (see Appendix 1.1 Scoping Report (APP-071) and Appendix 1.2 Scoping Opinion (APP-072)). See the response provided within LCC LIR 12.10 with regards to how BMV land has been factored into the site selection process and that although ALC, and therefore food production, was an important consideration in site selection, in accordance with national policy, it was one of several factors which were balanced to determine a favoured preferred site. The Applicant fully acknowledges the need for the protection of the agricultural supply chain and national food security. The statement made on 15th of May 2024 by the Secretary of State for Energy Security and Net Zero summarises the importance of a balance between protecting best and most versatile (BMV) land while still pursuing energy security, recently threatened by geopolitical changes. The Applicant is considering the option to utilise the Solar Array Area of the Proposed Development for grazing opportunities. In that way, the Proposed Development could still contribute to the agricultural supply chain, if a local grazier was interested in this opportunity. This opportunity is mentioned in the Outline Landscape and Ecological Management Plan (OLEMP) (APP-

		089), secured via Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**.
12.29	Furthermore, the whole area is productive farmland, which would be removed from mainly arable farming for 40 years, replaced with at best, a lower intensity grass based system. The loss of arable production is considered locally significant and in view of other projects in the wider District and County and potentially cumulatively significant. For context, the total cropped and uncropped arable land in Lincolnshire is 385,930ha according to figures published by DEFRA6, the total land proposed to be covered by solar farms, NSIP (order limits) and TCPA applications, is approximately 13,620 ha. On the assumption that the majority of land proposed for solar farms is arable land (of which solar would cover circa 3.23% of the cropped and uncropped arable total) and based on the total crop output figure of £1,564 million for 20237, the potential loss of crop output could be in the region of £50 million.	This statement has been reviewed and is noted by the Applicant. The lower intensity grass based system provides additional benefits to the soils within the Site, As stated in paragraph 14.7.18 of **Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES) "*The soils will provide other ecosystem services during the operational phase including for biodiversity and carbon storage due to the lower intensity land management strategies that will be adopted during operation"* This allows the soils to remain functional over the 40-year operation phase and soil quality within these areas may in fact be improved in terms of organic matter content (carbon storage) resulting in positive effects on soil quality indicators, allowing for the agricultural potential to be retained. This will help secure future cropping potential and value of the fields.
12.30	Section 14.12 of ES Chapter 14 assesses the potential for inter-project cumulative effects. Table 14.15 sets out the baseline conditions relevant to projects within LCC's administrative boundary that have been considered for the assessment. The Council welcomes the inclusion of NSIP scale developments across the County in the assessment as well as other non-NSIP developments.	This statement has been reviewed and is noted by the Applicant; no response required.

12.31	Paragraph 14.12.13 states that "Table 14.11 shows that the total amount of agricultural land within the LCC Boundary is 599,272.2 ha. Of this, 410,507.98 ha is BMV land". The Council broadly agree with these figures, however it must be highlighted that this figure is calculated using a GIS layer which overwashes other elements of the landscape such as settlements, woodland and ponds. As such the amount of BMV land actually available for agriculture would be less than the 410,507 ha stated.	This statement has been reviewed and is noted by the Applicant. The data source (Natural England's Provisional ALC data) used for the assessment (**Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES)) was the most accurate available to provide the required information, given that detailed ALC survey data are not available at a County/National level.
12.32	Paragraph 14.12.5 states that "For solar developments it is assumed that the impact on land is temporary and reversible as the majority of the land can be returned to agriculture in line with IEMA (2022) guidance". The Council do not agree with this statement, as described above for Beacon Fen and other solar schemes such as Springwell there is permanent loss of BMV land that is considered to be 'major'.	The Solar Array Area of the Proposed Development is proposed to include large areas of green infrastructure during operation. The Solar Array Area of the Proposed Development is proposed to be managed to include large areas of green infrastructure during operation. The areas of green infrastructure in the landscape strategy (**Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**), which includes the majority of land under the solar panels, are not expected to have any 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. As stated in paragraph 14.7.18 of **Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES) "*The soils will provide other ecosystem services during the operational phase including for biodiversity and carbon storage due to the lower intensity land management strategies that will be adopted during operation"* This allows the soils to remain functional over the 40-year operation phase and soil quality within these areas may in fact be improved in terms of organic matter content (carbon

		storage) resulting in positive effects on soil quality indicators , allowing for the agricultural potential to be retained. Therefore, there are not anticipated to be permanent adverse 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 following decommissioning. There is no intention by the Applicant or landowner (and no commitment proposed) for the Biodiversity Net Gian (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.
12.33	Paragraph 14.12.7 states that "If all the NSIP solar developments proceed, this would occupy an estimated 1.62% of agricultural land within the LCC boundary and 0.51% of BMV land within the LCC boundary". Paragraph 14.12.13 states "If all the non-NSIP proposed solar developments proceed, this would occupy an estimated 0.22% of agricultural land within the LCC boundary and 0.09% of the BMV land within the LCC boundary". The Council are of the view that the applicant's assessment underestimates the amount of BMV land affected by solar development in Lincolnshire and as such do not agree with these figures. The Council has recently undertaken a review of BMV land impacted by solar development within Lincolnshire and considers highlighting the extent of solar developments within the county to be relevant.	The process and methodology by which the Applicant undertook the cumulative assessment is provided in **Chapter 4- Scope and Methodology (APP-055)**. This sets out the Zone of Influence (ZOI) that was used to establish the list of projects to be considered. Engagement with Lincolnshire County Council (LCC), North Kesteven District Council (NKDC), Boston Borough Council (BBC) and South Holland District Council (SHDC) ensured that this ZOI was extended across the county of Lincolnshire. Publicly available data for these projects were obtained and GIS assessment were carried out using mapped Provisional Agricultural Land Classification (ALC) data and detailed ALC data where available to determine the amount of Best and Most Versatile (BMV) land impacted by the DCO projects included within the ZOI. This follows a best practice process for obtaining the required information for cumulative impact assessments and the approach is considered to be proportionate and robust.

12.34	Using data from the Renewable Energy Planning Database: quarterly extract8 for Lincolnshire, which has been updated to include information up to 23 June 2025, TCPA ground mounted solar farms of 1MW or above which are operational, under construction, granted planning permission and/or approved at appeal, cover 1584ha of BMV land in Lincolnshire, in addition to the 3555.87ha of BMV land covered by NSIP solar developments. Where there is no quantification of BMV, the provisional ALC maps have been used to make an informed estimate and where Grade 3 is shown, an assumption has been made that 50% will be subgrade 3a and 50% subgrade 3b.	This statement is acknowledged by the Applicant. This data included within the assessment (**Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES)) was accurate at the time of undertaking the assessment and preparing the ES.
12.35	Based on a review undertaken by the Council and based on publicly available figures, the amount of BMV land occupied by solar NSIP and TCPA development in Lincolnshire is currently circa 3.23% of all cropped and uncropped land (385,930 ha). Comparing the amount of BMV land covered by NSIP and TCPA solar against the amount of BMV land in Lincolnshire this provides a figure of 1.25% , however as noted earlier, the BMV figure for Lincolnshire is based on an overwash GIS layer which also includes the areas covered by other landscape elements such as settlements and woodlands and therefore a proportion of this BMV land is not available for agriculture.	This statement has been reviewed and is noted by the Applicant. See response to comment 12.31, above.
12.36	The Council notes that Table 14.15 lacks complete data for several NSIP schemes, with some entries relying on early-stage scoping information. The Council considers that assessments for Outer Dowsing, One Earth, Meridian, Grimsby to Walpole, EGL3, and EGL4 require updating. Additionally, emerging schemes currently in the pre-application stage, such as Ossian, EGL5, and Weston	This statement has been reviewed and is noted by the Applicant. The data included within the assessment (**Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES)) was accurate at the time of undertaking the assessment and preparing the ES. As stated within paragraph 4.6.3 of **Chapter 4 Scope and Methodology (APP-055)**, the approach taken by the

	Marsh to East Leicestershire, should also be reviewed as part of the assessment.	Applicant is in accordance with the PINS guidance on Cumulative Effects Assessments (CEA) (2024).
12.37	**Soil Management** Soil structure can be significantly damaged during construction, especially if work is carried out in wet conditions due to heavy vehicle traffic. While some damage can be remedied post-construction, long-term drainage issues may persist. The oSMP includes the cable route to help minimise impacts on soil structure, drainage, and quality. However, contractors often face pressure to meet deadlines, which may lead to work being done in unsuitable conditions. Although soil management clauses can help restore land quality, the layout of solar panels and buried cables often prevents effective remediation during the operational phase. This can reduce carbon sequestration and water infiltration, leading to standing water and degraded soil. A decommissioning and reinstatement programme is proposed, potentially enforceable through DCO requirements or obligations. However, its effectiveness in restoring land to productive agricultural use remains uncertain. Further comments on soil management and the potential for damage are provided in the Landscope Report in Appendix 2 to this report.	Section 5 of **Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013 to REP1-014)** includes 'Stop Conditions' that detail the measures that will be in place to prevent the handling and trafficking of wet and plastic soils. The Principal Contractor will be responsible for ensuring conformance with the measures detailed within the oSMP and ongoing monitoring of the detailed SMP implementation will be carried out by both a Soil Scientist and Agricultural Liaison Officer (ALO). Daily checks that include field testing of soil conditions are a requirement of the oSMP. A detailed soil management plan (substantially in accordance with the Outline Soil Management Plan **Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013)** is secured by the mechanism set out in requirement 16 of schedule 2 of the **Draft DCO (Document Ref: 3.1)**: The oSMP he detailed SMP is secured by the mechanism set out in requirement 16 of schedule 2 of the **Draft DCO (Document Ref: 3.1)**:
12.38	Should development go ahead, there would be a significant loss of the best classifications of agricultural land, with a significant loss of economic and other benefits. In light of other projects in the wider District and County, it is also potentially cumulatively significant. This loss of BMV land is	The responses to 12.3 and 12.10, above, address how the Proposed Development is in accordance with the relevant policy tests in NPS EN1 and EN3 and Policy S67 of the CLLP, as the site selection and design evolution of the Proposed

	contrary to national policy in the NPS EN1 and EN3 and Policy S67 of the CLLP.	Development has considered and sought to minimise the impacts on best and most versatile (BMV) land.
12.39	As such the Council concludes that the proposals would have a **negative** impact on agricultural land.	This statement has been reviewed and is noted by the Applicant; no response required.
13	**Socio-Economics**	
13.1	Local Policies: • CLLP Policy S48: Walking and Cycling Infrastructure • CLLP Policy S54: Health and Wellbeing • CLLP Policy S59: Green and Blue Infrastructure Network	CLLP policies, including policy S48, S54 and S59 are mentioned in **Appendix 15.1 Legislation Policy and Guidance (APP-177)** of the Environmental Statement (ES) and considered in the socio-economic assessment **Chapter 15 Socio-economics (APP-066)** of the ES. The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
13.2	NPS EN-1 section 5.13 deals with the socio-economic effects of major energy infrastructure and requires applications to include an assessment of relevant impacts including: • The creation of jobs and training opportunities. • The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; • Indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains	**Chapter 15 Socio-economics (APP-066))** of the Environmental Statement (ES) considers all the effects listed in Section 5.13 of the NPS EN-1. Paragraphs 15.6.1 to 15.6.14 of **Chapter 15** asses the effect of job creation and Gross Value Added (GVA) during the construction phase of the Proposed Development. Regarding local services and education, paragraph 15.5.38 acknowledges North Kesteven District Council's (NKDC) wish to organise school visits to the Proposed Development. Local supply chain opportunities are explored in **Appendix 15.3: Outline Skills, Supply Chain and Employment Plan**

	• Effects on tourism. • The impact of a changing influx of workers during the different construction, operation, and decommissioning phases of the energy infrastructure. • Cumulative effects.	**(OSSCEP) (APP-179)** (secured pursuant to schedule 2 requirement 17 of **Draft Development Consent Order (Document Ref: 3.1)**), aiming to enhance local services and opportunities. Effects on tourism during construction are considered in paragraphs 15.6.47 to 15.6.50 of **Chapter 15 Socio-economics**. Changing influx of workers in discussed in **Chapter 15 Socio-economics**; impact from influx of workers is covered in paragraphs 15.6.37 to 15.6.39 for construction, and paragraph 15.6.71 for operation. It is expected influx impacts during decommissioning will be similar to those during construction. Cumulative effects for the Proposed Development are considered in Section 15.8 of **ES Chapter 15 Socio-economics (APP-066),** and within **Chapter 18 Cumulative Effect (APP-069)** of the ES. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
13.3	NPS EN-1 makes reference to a list of potential impacts to consider which mirror those set out above, with an additional reference to the contribution to low carbon industries. It also refers to the SoS potentially including a requirement which specifies the approval of an employment and skills plan by the local authority.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
13.4	**Background** ES Chapter 15 Socio-economics (APP-066) provides an assessment of the likely significant effects of the proposed development on socio-economics throughout the scheme's lifetime. It considers the potential for likely significant	This statement has been reviewed and is noted by the Applicant; no response required.

	effects during the construction, operation and decommissioning phases of the Proposed Development on residential properties within the immediate area of the Proposed Development and settlements in the wider surrounding area in terms of employment, local procurement, increased exposure to noise, air pollution and traffic, tourism, livelihoods, recreation, influx of workers, physical resettlement and wellbeing.	
13.5	**Education, skills and supply chain** The bullet pointed measures in paragraph 15.7.2 (such as prioritising local employment) are welcome and must be delivered throughout the construction, operation and decommissioning phases. The Council welcomes the inclusion of a DCO requirement to secure the Skills, Supply Chain and Employment Plan (SSCEP). In addition the Council would recommend that an annual funding contribution of £50,000 is provided for the lifetime of the development to assist the implementation of the SSCEP and support the initiatives identified. In Lincolnshire a similar contribution has been provided by way of a s106 agreement in relation to the Heckington Fen solar farm and has been agreed, in principle, as part of the Springwell solar farm examination.	The Applicant sets out its current position in regards S106 and requests for S106 from HLAs, in response to the Examining Authority's written question GCT.1.11. The Applicant's Responses to the ExAs ExQ1 document is submitted at the same deadline **(Document Ref: 9.6)**. (Low Carbon)
13.6	A summary of the key sensitive receptors in the study area is provided at Table 15.10, however the potential impacts on education, skills and supply chain appears to be missing and should be included as a receptor in the assessment.	Within **Chapter 15 Socio–Economics (APP-066)** of the Environmental Statement (ES), Table 15.10 Receptor Sensitivity Summary presents different groups of residents that could be affected by activities associated with the Proposed Development in a range of different ways. The groups of receptors have been identified and their sensitivity determined, taking into account the different characteristics, including skill set and education. The supply chain impact is assessed throughout the direct and indirect area of influence

		(as described within Section 15.3 Consultation & Scope of Assessment of **Chapter 15 Socioeconomics** and illustrated on both **Figure 15.1 Direct Area of Influence (APP-271)** and **Figure 15.2 Indirect Area of Influence (APP-272)**) on the different receptor groups identified. in line with the presented methodology (Section 15.4), impacts should not be considered as receptors.
13.7	Paragraph 15.5.46 of the ES states that 'Touring caravan and camping sites have not been considered as this is not considered to be appropriate accommodation for workers'. However, it is noted that there are 34 Touring Caravans/Camping sites and the potential impact by the proposed development on these sites should be considered in relation to tourism and the benefit that such sites can have for the local economy.	Paragraph 15.5.46 of **Chapter 15 Socio-economics (APP-066)** of the Environmental Statement (ES) 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 Local Accommodation and 15.8 Total Accommodation in NKDC, 2020 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 Total Accommodation in NKDC, 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 Assessment of Effects 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 the tourism baseline conditions, it will be very short term, localised and affecting a limited number of receptors, resulting in minor adverse (Not Significant) effects. Additionally, **Chapter 6 Landscape and Visual (APP-057)**, **Chapter 10 Noise and Vibration (APP-061)** and **Chapter 16 Air Quality (APP-067)** of the ES do not identify any camping or caravan sites as sensitive receptors or identify any potential effects on these sites.
13.8	**Tourism** Lincolnshire County 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. Please note the Western portion of the Beacon Fen proposed 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 of the development 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. Lincolnshire's landscape and open skies are recognised as significant economic drivers, supporting the visitor economy.	**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) recognises the importance of both the Southern Lincolnshire Edge National Character Area and the Fens National Character Area. Both of these have been assessed and no significant effects are identified. **Chapter 15 Socio-economics (APP-066)** of the ES takes into account the findings of **Chapter 6 Landscape and Visual** assessment when considering the effect of the Proposed Development on tourist and recreation activities identified in the ES. Taking all aspects into account, the overall effect is considered to be Not Significant.

13.9	At paragraph 15.9.3, entirely new information that is not assessed anywhere in ES Chapter 15 is introduced, that '*Touristic attractions rarely attract visitors from outside of the region*' . The Council is unsure to which tourist attractions this refers. Paragraph 15.9.3 also goes on to state 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: which for 2023, generated 2.9 million visitors, a total value of £201 million and directly supported the full time equivalent of over 2,000 jobs across the year. The Council is concerned that the importance of visitor economy in North Kesteven is not being fully acknowledged.	As detailed within paragraph 15.4.7 of **Chapter 15 Socio-economics (APP-066) of the Environmental Statement (ES), t**he baseline information on tourism was carefully collected through desktop research and interviews with local residents and the Economic Development Manager of North Kesteven District Council (NKDC). Tourist attractions are defined within paragraphs 15.5.39 to 15.5.43 and include, though is not limited to, the Heckington Village Trust Railway & Heritage Museum, the Heckington Windmill, Swaton Vintage Day and World Egg Throwing Championships and the Heckington Show. Additional attractions identified are listed within **Chapter 15 Socio-economics**. Paragraphs 15.5.11 to 15.5.22 analyse the main contributors to Gross Value Added (GVA) and jobs in the study area. Tourism is not currently among the largest contributors to GVA or jobs and, thus, the concluding statement is that "*the visitor economy is not a significant contributor to GVA in the study area*". However, it was noted during the NKDC interview that visitor economy is an important Council priority, which is acknowledged in paragraph 15.5.36 and a full assessment of the Proposed Development on identified tourist and recreation activities is presented in paragraphs 15.6.47 to 15.6.50 within **Chapter 15 Socio-economics**, taking into account impacts from increased traffic, increased demand on accommodation and landscape and visual effects.
13.10	**Temporary Workforce** The impacts of a temporary workforce should be a receptor in table 15.10. As identified at paragraph 15.6.43 a peak of 433 workers would require accommodation during November 2027 falling to a peak of 363 by May 2028, however it is not clear how many workers would commute. The chapter focuses on shops, hospitality and	This statement (13.10) has been reviewed and noted by the Applicant. The response provided, below, is also relevant to some of the following statements provided by Lincolnshire County council within this Local Impact Report. Where this is the case, reference is made to '13.10'.

accommodation itself and appears to ignore the potential negative socio-economic effects that could arise including:

- 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, most importantly healthcare and potentially education 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.

Boston Borough and North Kesteven workforces are included as receptors in Table 15.10 Receptor Sensitivity Summary of **Chapter 15 Socio-economics (APP-066)** of the Environmental Statement (ES). 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 the implementation of **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)**, secured pursuant to Schedule 2 Requirement 17 of the **Draft DCO (Document Ref: 3.1)** 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% as a worst-case scenario, therefore a conservative approach.

Adverse effects on services such as education, healthcare and housing market have 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 or health services;
- assumption that a successful implementation of **Appendix 15.3 Outline Skills, Supply Chain and Education Plan (APP-179)** 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)** and **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**, secured in turn via Requirement 17 and 12 in Schedule 2 of the **Draft DCO (Document Ref: 3.1)**, respectively): • 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 (section 3.6 of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**.
13.11	At paragraph 15.9.3, entirely new information that is not assessed anywhere in ES Chapter 15 is introduced, that '*Touristic attractions rarely attract visitors from outside of the region*' . The Council is unsure to which tourist attractions this refers. Paragraph 15.9.3 also goes on to state that '*the visitor economy is not a significant*	As detailed within paragraph 15.4.7 of **Chapter 15 Socio-economics (APP-066) of the Environmental Statement (ES), t**he baseline information on tourism was carefully collected through desktop research and interviews with local residents and the Economic Development Manager of North Kesteven District Council (NKDC). Tourist attractions are

	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: which for 2023, generated 2.9 million visitors, a total value of £201 million and directly supported the full time equivalent of over 2,000 jobs across the year. The Council is concerned that the importance of visitor economy in North Kesteven is not being fully acknowledged.	defined within paragraphs 15.5.39 to 15.5.43 and include, though is not limited to, the Heckington Village Trust Railway & Heritage Museum, the Heckington Windmill, Swaton Vintage Day and World Egg Throwing Championships and the Heckington Show. Additional attractions identified are listed within **Chapter 15 Socio-economics**. Paragraphs 15.5.11 to 15.5.22 analyse the main contributors to Gross Value Added (GVA) and jobs in the study area. Tourism is not currently among the largest contributors to GVA or jobs and, thus, the concluding statement is that "*the visitor economy is not a significant contributor to GVA in the study area*". However, it was noted during the NKDC interview that visitor economy is an important Council priority, which is acknowledged in paragraph 15.5.36 and a full assessment of the Proposed Development on identified tourist and recreation activities is presented in paragraphs 15.6.47 to 15.6.50 within **Chapter 15 Socio-economics**, taking into account impacts from increased traffic, increased demand on accommodation and landscape and visual effects.
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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, most importantly healthcare and potentially education 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.

Chain and Employment Plan (OSSCEP) (APP-179), secured pursuant to Schedule 2 Requirement 17 of the **Draft DCO (Document Ref: 3.1)** 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% as a worst-case scenario, therefore a conservative approach.

Adverse effects on services such as education, healthcare and housing market have 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 or health services;
- assumption that a successful implementation of **Appendix 15.3 Outline Skills, Supply Chain and Education Plan (APP-179)** 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)** and **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**, secured in turn via Requirement 17 and 12 in Schedule 2 of the **Draft DCO (Document Ref: 3.1)**, respectively):

		• 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 (section 3.6 of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**.
13.13	At paragraph 15.9.3, entirely new information that is not assessed anywhere in ES Chapter 15 is introduced, that '*Touristic attractions rarely attract visitors from outside of the region*' . The Council is unsure to which tourist attractions this refers. Paragraph 15.9.3 also goes on to state 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: which for 2023, generated 2.9 million visitors, a total value of £201 million and directly supported the full time equivalent of over 2,000 jobs across the year. The Council is concerned that the importance of visitor economy in North Kesteven is not being fully acknowledged.	As detailed within paragraph 15.4.7 of **Chapter 15 Socio-economics (APP-066) of the Environmental Statement (ES), t**he baseline information on tourism was carefully collected through desktop research and interviews with local residents and the Economic Development Manager of North Kesteven District Council (NKDC). Tourist attractions are defined within paragraphs 15.5.39 to 15.5.43 and include, though is not limited to, the Heckington Village Trust Railway & Heritage Museum, the Heckington Windmill, Swaton Vintage Day and World Egg Throwing Championships and the Heckington Show. Additional attractions identified are listed within **Chapter 15 Socio-economics**. Paragraphs 15.5.11 to 15.5.22 analyse the main contributors to Gross Value Added (GVA) and jobs in the study area. Tourism is not currently among the largest contributors to GVA or jobs and, thus, the

		concluding statement is that "*the visitor economy is not a significant contributor to GVA in the study area*". However, it was noted during the NKDC interview that visitor economy is an important Council priority, which is acknowledged in paragraph 15.5.36 and a full assessment of the Proposed Development on identified tourist and recreation activities is presented in paragraphs 15.6.47 to 15.6.50 within **Chapter 15 Socio-economics**, taking into account impacts from increased traffic, increased demand on accommodation and landscape and visual effects.
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- Public health and safety, depending on age, gender and location of temporary accommodation, with potential for anti-social behaviour.

Adverse effects on services such as education, healthcare and housing market have 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 or health services;
- assumption that a successful implementation of **Appendix 15.3 Outline Skills, Supply Chain and Education Plan (APP-179)** 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)** and **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**, secured in turn via Requirement 17 and 12 in Schedule 2 of the **Draft DCO (Document Ref: 3.1)**, respectively):

- 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 (section 3.6 of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**.
13.15	**Cumulative** The commitment to produce SSCEP is welcomed, however this is set against the temporary nature of the majority of the employment, the more specialist nature of solar suppliers, and indirect 'supply chain' benefits noted in paragraph 15.6.5 the vast majority of which would be confined to the construction phase. The impact of this scheme both alone and more significantly in combination with other NSIPs within a 25km radius will be substantial. The construction phase will impact on accommodation, access to community infrastructure and healthcare, and access local services. At this point impacts associated with the tourism industry and the agricultural supply chains (upstream and downstream) will start to be experienced and will continue through the operational phase and into decommissioning commencing circa 2090. The inter-cumulative impacts of the proposal alongside other NSIP proposals are not sufficiently well analysed or mitigated in this application. The significance of effects is being asserted as Negligible Adverse on the assertion that large-scale infrastructure schemes are a characterising presence, however this is subjective. On balance therefore,	As mentioned in the response to 13.10, above, adverse effect on such 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),** and **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**

the Council considers the impacts associated with matters on socio-economic impact to be **negative**.	via Requirement 17 and 12 in Schedule 2 of **the Draft DCO (APP-038**), respectively: • 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. In terms of the long-term impact on the visitor economy, while cumulatively, it is difficult to predict tourist preferences and behaviours with multiple energy parks being developed in Lincolnshire, it is worth mentioning a perception study undertaken by The South West Research Company in 2013 on the Impact of Renewable Energy Farms on Visitors to Cornwall. While the perceptions might have changed since 2013, it is important to highlight that 80% of visitors surveyed had positive attitudes towards renewable energy parks, with just 6% having negative attitudes towards them. Overall, the report indicates that only 2% of visitors were less inclined to return to the county due to the presence of wind and solar farms. In contrast, 4% were more likely to visit, possibly reflecting the appeal of these developments to some individuals and, more significantly, the perception that the

		county was taking positive steps by embracing renewable energy and supporting environmental initiatives. For long-term economic losses from changes in the use of land, please see response to 13.14, above.
13.16	**Public Rights of Way** Section 2.10 of EN-3 makes several recommendations in relation to accessibility and Public Rights of Way (PRoW), noting at 2.10.35 that the suitability of the access routes to the proposed site for both the construction and operation of the solar farm must be considered, with the former likely to raise more issues. EN-3 advises that applicants should keep, as far as is practicable and safe, all PRoW that cross the proposed development site open during construction and protect users accordingly. They are also encouraged to design the layout and appearance of the site to ensure continued recreational use of PRoW, where possible during construction, and in particular during operation, and to provide enhancements to PRoW and the adoption of new PRoW through the site.	The Applicant considered the Public Right of Way (PRoW) network during the design stage, with careful consideration to assess the impact of temporary closures on the local PRoW network included throughout the design and assessment process. **Chapter 15 Socio-economics (APP-066)** of the Environmental Statement (ES) reports no significant effects on the PRoW network. Moreover, The Applicant is proposing an enhancement of Ewer/12/11 which is considered to provide a considerable addition to the local network of PRoWs. The management of PRoWs during construction is detailed in responses, below.
13.17	Local Policies: • CLLP Policy S48: Walking and Cycling Infrastructure • CLLP Policy S54: Health and Wellbeing • CLLP Policy S59: Green and Blue Infrastructure Network • SELLP Policy 31: Climate Change and Renewable and Low Carbon Energy • SELLP Policy 33: Delivering a More Sustainable Transport Network	The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.

13.18	The theme of the CLLP policies relates to the protection, maintenance, and availability of public rights of way, specifically on the grounds that they provide public access to green/natural spaces as well as provide places for exercise, health, and wellbeing.	The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
13.19	The ES Chapter 15 (Socio-Economic) (APP- 066) and Figure 15.3 Public Rights of Way (APP- 273) identifies a number of PRoW, that depending on the final design, may be temporarily affected during the construction phase. The PRoW all fall within the Cable Route and Access Road Corridors, with the exception of one LL|Ewer|12/1 in the solar array area which the applicant states is inaccessible and not currently not in use. Three PRoWs would affected by temporary closures due to land take for the Bespoke Access Corridor, LL|KkLT|5/1, LL|KkLT|4/2 and LL|KkLT|6/1. PROW crossing the cable route corridor would also be subject to temporary closures. The applicant's assessment is that the impact would be short-term, reversible, and local, resulting in a minor adverse impact and therefore Not Significant.	This statement has been reviewed and is noted by the Applicant; no response required.
13.20	The majority of the construction works would avoid direct impacts on public rights of way, but there are some areas where the PRoW cross or run adjacent to the site. The Council would therefore have expected a PRoW Management Plan to have been included in the DCO application, that considers how these routes, particularly those that cross the transmission lines would be managed.	An **Outline Public Rights of Way Management Plan (Document Ref: 9.5)** that is being prepared for submission at Deadline 2 and will include detail on how construction traffic and activities interact with Public Rights of Way (ProW), the nature of interactions between PRoW users and construction traffic and activities, and measures to safely manage those interactions.
13.21	Specific path closures are set out in Schedule 5, Part 1 of the draft DCO. The Council has reviewed these closures and has the following comments: **Path** **LCC Comments**	An **Outline Public Rights of Way Management Plan (Document Ref: 9.5)** that is being prepared for submission at Deadline 2 will set out how KkLT/4/2 will be managed during temporary closure (estimated to be up to a week). The closure

	Ewer/12/1 The closure is considered to be sensible, the path appears to be a dead end at this point and runs over the operational part of the site KkLT/5/1 The closure is considered to be sensible; the path appears to be a dead end at this point and runs over the operational part of the site KkLT/4/2 LCC **objects** to closure without an alternative arrangement. This path provides the sole off-road link between Asgarby and Kirkby La Thorpe. Closure of this route would sever the connection. A diversion will be required or the path should remain open. Heck/14/1 The closure of this cross field route is considered to be sensible PROVIDED THAT walking along Star Fen Drove is available and safe. The diversion would add approx. 200m to an ongoing journey. Littleworth Drove is a quiet road with a verge suitable for walking (and presumably will stay that way) Heck/2/4 LCC **objects** to closure without an alternative arrangement. This is a long, off-road route from Heckington that provides a useful circular walk from Heckington and links to the east.	will be minimised by use of local diversions and a crossing marshal. The crossing will be clearly defined (and signed) with marshals available during more intense periods of activity (as informed by the Public Rights of Way (PRoW) use survey). The closure of footpath Heck/14/1 and any closure of footpaths crossing the Cable Route, will be managed through sharing information in advance with relevant authorities and PRoW users, introducing signage approaching the construction area(s) and the PRoW, onsite speed limit for construction traffic, driver training, physically defined boundaries to Cable Route works and nominated look out person, and restoration of ground conditions along the PRoW following construction. The Applicant acknowledges the importance of Heck/2/4 for recreation and connectivity. The closure is estimated to be less than a week and the above mitigation measures will be applied. Heck/2/4 is used mostly for recreation and does not constitute a crucial link between villages. Heck/12/1 and Heck/14/1 as well as a wide network of other PRoWs, locally, can constitute an alternative for recreational walk during the one week of closure.
13.22	Schedule 5, Part 2 details permanent use of motor vehicles on PROW, the Council has the following comments: **Path** **Comments on proposal** Ewer/9/1 Further details are needed on this point before the Council could consider agreement to this proposal. If permanent vehicle access is required, details of how the PRoW would be managed in terms of space and	This statement has been reviewed and is noted. The Applicant confirms that permanent interaction with development traffic is proposed on footpath Ewer/9/1. Interaction is likely limited to very low levels of light vehicle traffic for works required for the enhancement of Ewer/12/1. Additional details are provided in the response to 13.23, below.

	surface is required. The PROW would retain priority over motor vehicles and this needs to be taken into account.	
13.23	Schedule 5, Part 3 details temporary use of motor vehicles on PRoW. Further details about how all temporary vehicle use would be managed is required before the Council would agree to this proposal. If the paths are temporarily closed that would be acceptable provided it is reinstated to the Council's satisfaction afterwards, however any path that is open and being used by vehicles would need to be managed carefully in terms of space and surface. The PROW would take priority over vehicular use.	Where vehicles are required to cross or utilise a Public Rights of Way (PRoW) during construction, suitable management measures will be put in place to ensure that the safety of PRoW users is maintained. The details will be agreed as part of the **outline Public Rights of Way Management Plan (Document Ref: 9.5)** (to be submitted at Deadline 2), based on the outline PROWMP. Key measures are likely to include, traffic marshals (where necessary) to manage safe interaction between vehicles and PRoW users, and driver instructions to prioritise PRoW users. Where interactions between construction traffic and PRoW users cannot be safely managed, temporary closures or diversions may need to be agreed. The **outline PRoW Management Plan** identifies that closures will be only introduced when absolutely necessary, and short diversions within working areas are a preferred measure to avoid impacts to users. The **outline PRoW Management Plan** includes measures to inspect and restore PRoW surfaces following use by construction traffic.
13.24	The Council acknowledges the proposal to extend PRoW Ewer/12/1 in a south-westerly direction as a permissive path, terminating in the vicinity of Ewerby Thorpe. This extension, which is intended to remain in place for the operational duration of the project and would be subject to approval through the discharge of requirement process, is viewed positively. It offers the potential to establish a connection with existing PRoW routes, thereby facilitating the creation of a circular walking loop.	This statement has been reviewed and is noted by the Applicant; no response required.

13.25	Nevertheless, the Council maintains that the temporary closure of multiple footpaths during the construction phase is likely to result in a detrimental impact on the accessibility and functionality of the wider PRoW network. Consequently, the overall effect on public rights of way is considered to be **negative**.	The **outline Public Rights of Way (PRoW) Management Plan (Document Ref: 9.5)** that is to be submitted at Deadline 2 commits to liaison with Lincolnshire County Council (LCC) to ensure that and works required on the PRoW network will be managed to limit impacts on users. For example, any short-term closures may be staggered to ensure the network does not become unnecessarily fragmented.
13.26	The Council does have concerns about the wording of Article 15 in the draft DCO which appears to give blanket powers for the undertaker to temporarily close, divert or alter any PROW. Further comments are provided below in section 19 – Draft Development Consent Order below.	The **Draft DCO (Document Ref: 3.1)** includes controls within Article 16 (note the article number has changed in the latest version of the Draft DCO) for relevant authorities to be consulted with, including consent right regarding changes to Public Rights of Way (PROW).
14	**Human Health**	
14.1	Paragraph 4.4.1 of NPS EN-1 states that 'energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health'.	Potential effects of the Proposed Development of relevance to human health have been assessed throughout the Environmental Statement (ES) within **Chapter 9 Access and Traffic (APP-060)**, **Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**, **Chapter 15 Socio Economics (APP-066)** and **Chapter 16 Air Quality (APP-067)**. Human health is then considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**. Where required, mitigation measures will be implemented in order to avoid the potential for adverse impacts relating to human health determinants. No significant adverse effects in relation to human health are considered likely to occur as a result of the 'construction of energy infrastructure and the production,

		distribution and use of energy' associated with the Proposed Development. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
14.2	Paragraph 4.1.7 of EN-1 advises when weighing the impacts and benefits of a proposed development "Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero."	As per above, potential effects of the Proposed Development of relevance to human health have been assessed throughout the Environmental Statement (ES) within **Chapter 9 Access and Traffic (APP-060), Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**, **Chapter 15 Socio Economics (APP-066)**; and **Chapter 16 Air Quality (APP-067)**, and then considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**. Mitigation measures as identified within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures proposed (secured by the **Draft DCO (Document Ref: 3.1)**) will be implemented, where required, in order to avoid the potential for adverse impacts relating to human health determinants and no significant adverse effects in relation to human health are considered likely to occur as a result of the Proposed Development. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
14.3	Local Policies: • CLLP Policy S54: Health and Wellbeing • SELP Policy 30: Pollution	This comment has been reviewed and is noted. It is acknowledged that the Council has referenced *Policy S54: Health and Wellbeing* from the Central Lincolnshire Local Plan (adopted April 2023) and *Policy 30: Pollution* from the South-

		East Lincolnshire Local Plan 2011-2036 (adopted March 2019). The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
14.4	CLLP Policy S54 states that the potential for achieving positive mental and physical health outcomes will be taken into account when considering all development proposals. Where any potential adverse health impacts are identified, the applicant will be expected to demonstrate how these will be addressed and mitigated. The Central Lincolnshire authorities will expect development proposals to promote, support and enhance physical and mental health and wellbeing, and thus contribute to reducing health inequalities. The provision of a Health Impact Assessment for development of 5 ha or above is required to demonstrate how the conclusions of the HIA have been taken into account in the design of the scheme.	Potential effects of the Proposed Development of relevance to human health have been assessed throughout the Environmental Statement (ES) within **Chapter 9 Access and Traffic (APP-060), Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**, **Chapter 15 Socio Economics (APP-066)**; and **Chapter 16 Air Quality (APP-067)**, and then considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**. Mitigation measures as identified within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures proposed (secured by the **Draft DCO (Document Ref: 3.1)**) will be implemented, where required, in order to avoid the potential for adverse impacts relating to human health determinants and no significant adverse effects in relation to human health are considered likely to occur as a result of the Proposed Development. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
14.5	SELP Policy 30 states that "*Development proposals will not be permitted where, taking account of any proposed mitigation measures, they would lead to unacceptable adverse impacts upon: 1. health and safety of the public*;"	Potential effects of the Proposed Development of relevance to human health have been assessed within **Chapter 9 Access and Traffic (APP-060), Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**,

		Chapter 15 Socio Economics (APP-066); and **Chapter 16 Air Quality (APP-067)**, and are considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**. Mitigation measures will be implemented, where required, in order to avoid the potential for adverse impacts relating to human health determinants and no significant adverse effects in relation to human health are considered likely to occur as a result of the Proposed Development. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
14.6	A dedicated chapter on Human Health is not included in the ES, having been scoped out of the assessment. The impact of the development on Human Health has been considered where relevant under other specific topic chapters of the ES and supporting documentation.	This comment has been reviewed and is noted. It is acknowledged that the Council agrees that a dedicated chapter on Human Health was 'scoped out' of the Environmental Statement during Scoping and that potential impacts of the Proposed Development upon human health have been assessed within relevant chapters of the Environmental Statement (ES). For clarity, these are **Chapter 9 Access and Traffic (APP-060), Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**, **Chapter 15 Socio Economics (APP-066)**; and **Chapter 16 Air Quality (APP-067).** The impacts are then considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**.
14.7	A Health Impact Assessment aligned with CLLP Policy S54 (Health and Wellbeing) would have been preferred. Moreover, the lack of a dedicated Human Health chapter within the ES, which could have consolidated both positive and negative health impacts, is disappointing. Notably, the	A health screening exercise was undertaken (in accordance with the Central Lincolnshire Healthy Planning Checklist) and included within **Appendix 1.1 Scoping Report (APP-071) of the Environmental Statement (ES)**. This considered potential impacts on mental health due to stress from construction and decommissioning activities, including

assessment appears to have inadequately addressed mental health impacts.	increased noise and traffic. The Scoping Report proposed that these impacts can be mitigated through adherence to a Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP), which are secured via Requirements 12 and 13 of the draft **DCO (Document Ref: 3.1)**. As stated within **ES Appendix 1.2 Scoping Opinion (APP-072)**, it was agreed that, considering the information provided in the Scoping Report, human health could be scoped out of the ES provided adequate signposting between aspect chapters is included (ID 3.11.8 within Section 3.11 of the Scoping Report). The technical chapters of the ES (i.e. **Chapters 6 to 16 (APP-057 to APP-067)**) consider the potential impacts upon human health to the extent appropriate to the Proposed Development, providing cross-references where required. A summary of the consideration of human health throughout the ES is provided within **Chapter 17 Other Environmental Topics (APP-068). Chapter 15 Socio-Economics (APP-066)** provides baseline data on community health and wellbeing, and further considers related impacts including restricted access to recreation, and increased exposure to noise and traffic. Table 15.3 confirms that the potential impact on the wellbeing of people has been considered when defining the magnitude of change. The potential socio-economic effects of the Proposed Development in terms of human health are assessed to be minor and Not Significant, with no adverse impacts on human health or wellbeing. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277).**

14.8	The Council's Public Health division notes the comments submitted by Ewerby and Evedon Parish Council in its representation (AS-023). It is evident that the prospect of the development on this scale is already causing anxiety and stress to residents due to the loss of farming land and the impact on the countryside over such a large proportion of the parish. The villages, hamlets and roads around the site are in elevated positions looking down on the proposed solar arrays. Newly planted hedgerows as screening will, therefore, do little to improve the visual amenity for residents. New screening that is planted if any development goes ahead must be well developed (i.e., mature trees) and be allowed to settle in before construction commences, such that they are established by the time of operation and looked after throughout the lifespan of the project. Contributing to new accessible woodland would be preferable. Land around and under the panels could potentially still be used for some arable food growing. Where it is not, grazing land or wildflower meadows could be considered rather than just grass to continue food production and/or contribute to biodiversity improvements.	The Applicant understands and acknowledges that limited anxiety and stress can be an inevitable part of any change brought by any development of this scale. Anxiety is often caused by limited information and lack of consultation. To tackle this and reduce anxiety of local residents, the Applicant is committed to recruiting a Community Liaison Officer (CLO) as secured through a requirement in Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. A CLO will be appointed prior to construction commencing (and will continue in this role through until the date of final commissioning of the Proposed Development) as a formal forum for local issues to be raised. While the loss of farming can be a worry for residents, **Chapter 15 Socio-Economics (APP-066)** assesses that the loss of farming jobs will be Not Significant. Additionally, the possibility of grazing during the operational phase is being considered by the Applicant in accordance with **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)**, secured via Requirement 7 of Schedule 2 of the Draft DCO. **Chapter 14** Soils and Agricultural Land **(APP-065) of the ES** confirms that the reversible loss of agricultural land during the operational phase will have a moderate adverse impact as a worst case. At the same time, the pause in agricultural production will bring ecological benefits – Biodiversity Net Gain as described in **Chapter 7 Ecology (APP-058)** and **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089).** Lastly, the reversible loss of agricultural production will be replaced by the production of clean energy, helping to reach ambitious net zero goals, which can be a source of local pride, similar to the pride gained from farming. In terms of concerns regarding visual impact, the landscape proposals for the Proposed Development are illustrated in

Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235). The aim of the strategy is to facilitate integration of the Proposed Development into the landscape context through the retention of existing mature vegetation including hedgerows, individual trees, scrub and woodland combined together with proposed measures to provide further landscape and visual mitigation. These measures include the introduction of native shrub belts with trees to mitigate visual impacts. Specific measures will include strengthening the boundary, perimeter planting to the Solar Array Area through infilling gaps and the introduction of the introduction of native shrub belts with trees for specific receptors. These include residential properties adjacent to the Solar Array Area and to the west of the Battery Energy Storage System (BESS) to provide screening of the BESS and substation from visual receptors to the west, including those at Ewerby and Ewerby Thorpe. **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** set outs the objectives for specific landscape elements and habitat creation measures including outline planting and maintenance specifications intended to provide assurance that the proposed measures will become established and fulfil the intended mitigation purpose. **Chapter 6 Landscape and Visual (APP-057)** of the ES reports that significant effects will not be experienced within defined settlements as a whole although significant effects will be experienced by a limited number of residential receptors, users of the Public Right of Way (PRoW) and minor road network in close proximity to the Proposed Development. Following establishment of mitigation planting the extent and number of receptors experiencing significant effects will be further reduced. The effects of mitigation planting in relation to close distance views are illustrated in the photomontages from

		Ferry Lane, **Figure 6.27a, b and c (APP-229)** and Halfpenny Toll Lane near Ewerby Thorpe (Farm), **Figure 6.29a, b and c (APP-231)**. Woodland was considered an option but was assessed as not suitable with the original landscape of the area and set landscape plans. Wetland habitats and grassland was chosen as a suitable alternative to agricultural land, promoting biodiversity and achieving Biodiversity Net Gain (BNG) through the Proposed Development (as presented in the **Outline Landscape and Ecological Management Plan (OLEMP) (APP-089) and the Biodiversity Net Gain Strategy (APP-280))**.
14.9	Public Health is satisfied that air quality, noise, and glint and glare issues during all phases of the development have been considered in relevant chapters of the ES. However, the ExA should be guided by the opinion of NKDC Environmental Health Services and the UK Health Security Agency (UKHSA) on these issues.	This statement has been reviewed and is noted. It is acknowledged that the Council is satisfied that air quality, noise, and glint and glare issues during all phases of the development have been considered. No further comment required.
14.10	The applicant's consideration of Electromagnetic Fields (EMF) and assessment as not significant is noted and the Council welcome all cabling being underground. It is also noted that EMF from the operation would be below exposure levels specified in health protection guidelines from the International Commission on Non-Ionizing Radiation Protection (ICNIRP) at all residential receptors.	This statement has been reviewed and is noted. It is acknowledged that the Council highlights that the Electromagnetic Fields (EMF) assessment as being Not Significant and the Council welcomes all cabling being underground. The Council also highlights that the EMF from the operation would be below exposure levels specified within health protection guidelines from the International Commission on Non-Ionizing Radiation Protection at all residential receptors. No further comment required.

14.11	The Council's public health comments should be read in conjunction with responses submitted by the Office for Health Improvement and Disparities (OHID) and the UKHSA.	This statement has been reviewed and is noted. It is acknowledged that the Council advises that it's public health comments should be read in conjunction with responses submitted by the Office for Health Improvement and Disparities and the UK Health Security Agency. No further comment required.
14.12	Whilst there are enhancements through this development that may lead to a neutral position on health and wellbeing; overall, it is felt this large-scale development would be visible from nearby villages, and there is more that needs to be done to mitigate the potential mental health effect on the local communities; therefore, on balance the Council considers the impacts associated with health to be **negative**.	A health screening exercise was undertaken, in accordance with the Central Lincolnshire Healthy Planning Checklist, and included within Appendix 1.1 **Scoping Report (APP-071)**, mental health was not scoped in. **Chapter 15 Socio-Economics (APP-066)** of the Environmental Statement (ES) provides baseline data on community health and wellbeing, and further considers related impacts including restricted access to recreation (including visual effects). Table 15.3 Social Receptor sensitivity Scale confirms that the potential impact on the wellbeing of people has been considered when defining the magnitude of change. The potential socio-economic effects of the Proposed Development in terms of human health are assessed to be minor and Not Significant, with no adverse impacts on human health or wellbeing, including mental health. The potential visual effects on users of recreational facilities are also covered within **ES Chapter 15** of the ES.
14.13	Appropriate compensation and demonstrable community benefits from the commencement of the project, such as enhancements to local infrastructure could provide potential health and wellbeing benefits for residents adversely affected by the development. Any proposed Community Fund could contribute to these community gains and other health improvement agendas. The Council's Public Health Division would like to influence the	The Applicant is happy to take into account all suggestions for the ultimate use of a community fund from the Proposed Development. It is important to note that, at present, there is an ongoing consultation, undertaken by Department for Energy Security and Net Zero titled "Community benefits and shared ownership for low carbon energy infrastructure" which, subject to the outcome, may impact the Applicant's ability to decide on the administering of any funds. The direction of

	allocation of a future Community Fund if the DCO is granted.	Government policy on community benefits continues to evolve and the Applicant will need to respond to any changes accordingly.
14.14	The Council also notes that the DCO requires (Requirement 4) a Community liaison group with an intention to disband it at the end of the commissioning phase. Subject to the views of the group/community, we would like to see the possibility of this group, or similar, continuing to facilitate the relationship between the project and local communities throughout the lifetime of the project.	Requirement 4 of the draft DCO provides that the Applicant must establish a community liaison group prior to the commencement of the Proposed Development, in order to facilitate liaison between representatives of people living in the vicinity of the Order Limits, and other relevant organisations in relation to the construction of the Proposed Development. Whilst the Applicant does not consider it proportionate/necessary to be conditioned under the draft DCO to continue the group following the completion of the construction, the Applicant is open to discussing with the relevant LPAs appropriate arrangements for the next phase at that future point and anticipates such discussion would be best facilitated through the operation of the group itself.
15	**Minerals and Waste**	
15.1	**Minerals and Waste Safeguarding** Paragraph 5.11.19 of NPS EN-1 states, "Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place."	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
15.2	The NPPF paragraph 222 emphasises the importance of a sufficient supply of minerals to provide infrastructure, building, energy and goods that the country needs. It goes on to say at paragraph 223 (c) that planning policies should safeguard mineral resources by defining MSA and Mineral	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

	Consultation Areas (MCA); and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked).	
15.3	Local Policies: • LMWLP Policy M11: Safeguarding of Mineral Resources • LMWLP Policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure • LMWLP Policy W8: Safeguarding Waste Management Sites	The performance of the Proposed Development against these policies is appraised in the **PS (APP-277)**.
15.4	LMWLP Policy M11 (Safeguarding of Mineral Resources) requires proposals for development within a mineral safeguarding area (MSA) to be accompanied by a Minerals Assessment and will only be granted where it can be demonstrated that it would not sterilise a mineral resource. Where this is not the case then proposals will need to demonstrate compliance with a range of criteria.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
15.5	LMWLP Policy 12 (Safeguarding of Existing Mineral Sites and Associated Mineral Infrastructure) safeguards existing mineral sites that supply minerals in the county from development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible and uses nearby.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
15.6	LMWLP Policy 8 (Safeguarding Waste Management Sites) seeks to protect safeguarding existing and allocated waste management facilities from redevelopment to a non-waste	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

	use and/or the encroachment of incompatible development.	
15.7	The northern most corner of the Order Limits intersects with a Minerals Safeguarding Area (MSA) for sand and gravel, as shown on Figure 9: Existing Minerals and Waste Sites (North Kesteven District) map of the LMWLP. 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 and relevant representation (RR-002), the Council's view is that there is no requirement to undertake a minerals assessment for this project. Accordingly, the Council does not object to the proposal on mineral or waste safeguarding grounds, and the development is considered to have a **neutral** impact in this regard.	This statement has been reviewed and it is noted that the Council acknowledges that there is 'no requirement to undertake a minerals assessment for the Proposed Development and does not object to the proposal on mineral or waste safeguarding grounds, and that the Proposed Development is considered to have a **neutral** impact in this regard'.
15.8	**Waste Management** NPS EN-1 states at paragraph 5.15.4 that "All large infrastructure projects are likely to generate hazardous and non-hazardous waste. The EA's Environmental Permitting regime incorporates operational waste management requirements for certain activities. When an applicant applies to the EA for an Environmental Permit, the EA will require the application to demonstrate that processes are in place to meet all relevant Environmental Permitting requirements."	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.

15.9	Paragraphs 5.15.14 and 5.15.15 of NPS EN-1 outline that during decision making consideration should be given to the extent the Applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction operation and decommissioning of the proposed development. Waste should be properly managed, both on-site and off-site and can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Waste arisings should not have an adverse effect on the capacity of existing waste management facilities and steps should be taken to minimise the volume of waste arisings.	**Appendix 17.2 Waste and Recycling Strategy (APP-189)** has been prepared in respect of appropriate waste management to be adopted. Paragraph 1.1.3 of this states that "*This strategy has been prepared as an indicative document which is intended to inform the preparation of Site Waste Management Plan(s) (SWMP) during the construction and decommissioning phases of the Proposed Development. SWMPs will be prepared as part of the preparation of detailed Construction Environmental Management Plan(s) and detailed Decommissioning Environmental Management Plan(s) prior to construction and decommissioning of the Proposed Development*". The Construction Environmental Management Plan is secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1**) and the Decommissioning Environmental Management Plan is secured via Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1**). (Note that the requirement numbering has changed in the latest version of the Draft DCO). Additionally, Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures proposed (secured by the **Draft DCO (Document Ref: 3.1)**) in respect of waste. **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** (secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**) and **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)** (secured via Requirement 19 of Schedule 2 in the **Draft DCO)**

		also specify mitigation measures for the management and reduction of waste.
15.10	Local Policy: CLLP Policy S53: Design and Amenity	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
15.11	Part (9) of CLLP Policy S53 requires schemes to minimise the need for resources both in construction and operation of buildings and be easily adaptable to avoid unnecessary waste production. One of the 15 objectives of the CLLP as set out in paragraph 1.5.2, under the heading of 'Waste' is 'To minimise the amount of waste generated across all sectors and increase the reuse, recycling and recovery rates of waste materials'.	Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) detail the mitigation measures proposed in respect of waste. These are secured by the **Draft DCO (Document Ref: 3.1)**. **Appendix 17.2 Waste and Recycling Strategy (APP-189)** has been prepared in respect of appropriate management and reduction of waste. Appendix 17.2 is an 'indicative document that is intended to inform the preparation of Site Waste Management Plan(s) (SWMP) during the construction and decommissioning phases of the Proposed Development'. The SWMPs will be prepared as part of the detailed Construction Environmental Management Plan and detailed Decommissioning Environmental Management Plan. These are secured via Requirement 12 and Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1**), respectively. At this stage, **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** and **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)**

		include mitigation measures for the management and reduction of waste. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
15.12	The Council has reviewed the application in respect of waste matters and whilst waste has been scoped out of the ES as a separate chapter, a Waste and Recycling Strategy (APP-189) has been submitted with the DCO application. The Council has concerns about certain aspects of this document, primarily concerning the anticipated volume of end-of-life photovoltaic panels generated by this project, both in isolation and in conjunction with other proposed NSIP-scale solar developments within the County and adjacent counties, which are similarly experiencing a notable increase in large-scale solar installations. Currently the DCO application contains insufficient information on expected waste arisings, and of their proposed fate, from all phases of the development and cumulatively with other developments.	**Appendix 17.2 Waste and Recycling Strategy (APP-189)** has been prepared as an 'indicative document that is intended to inform the preparation of Site Waste Management Plan(s) (SWMP) during the construction and decommissioning phases of the Proposed Development'. The SWMPs will be prepared as part of the preparation of the detailed Construction Environmental Management Plan and detailed Decommissioning Environmental Management Plan (secured via Requirement 12 and Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1**), respectively) prior to construction and decommissioning.
15.13	As with other solar NSIP's the Council has serious concerns about the lack of current capacity for recycling solar panels, particularly at decommissioning but also with operational failures given the 40 year lifetime, weather related impacts (note the impact of Storm Darragh on the Porth Wen Solar Farm on Anglesey) and the cumulative impacts alongside other proposed NSIP-scale solar farms, particularly in terms of waste management capacity. The impact of adverse weather or other event which would require replacement of panels significantly earlier in the project lifetime would create issues given the lack of current capacity for recycling solar panels. There is no	The Applicant considers that **Appendix 17.2 Waste and Recycling Strategy (APP-189)** confirms the design life and replacement frequency for the main components of the Proposed Development, including the panels and batteries. Recycling routes are generally available for these materials at present beyond the United Kingdom (UK). When the time comes for these elements to be replaced, following the 40 year project lifetime and several decades into the future, it is likely that there will be greater opportunities for recycling, not least because the market will have expanded to meet demand as PV installations increase. Other schemes as part of their obligations and similarly developed waste management

	certainty that sufficient capacity for recycling solar panels will be available in 40 years' time. This has the potential to become a significant issue.	measures will need to address their impacts, ensuring cumulative matters are managed through appropriate channels. **Appendix 17.2 Waste and Recycling Strategy (APP-189)** states: "As maintenance activities are expected to be limited, it is anticipated that operational waste will be negligible in impact upon local waste capacity based upon an initial review in WasteDataInterrogator. Solar panel recycling and arisings are expected to require management through specialist waste management contractors, which may fall outside of the immediate local area, and are as described, with the associated impacts, in Section 7.3 of Appendix 17.2 and below. To manage the solar panel waste that will arise from potential panel replacements during the 40-year operational life of the Proposed Development, there will be a regular review of suitable outlets for reuse and recycling of the panels and associated infrastructure at the end of its viable life to maximise recycling. This is likely to be across offtakers in England, and if required, in Europe"
15.14	In respect of Policy W1 of the LMWLP this requires the Council to make provision for sites to meet predicted future capacity gaps for waste arisings. Currently there are no waste facilities locally to process discarded solar infrastructure as it is replaced during the lifetime of the development and at the decommissioning stage. When combined with the other solar projects in the county and region, cumulatively this will potentially present a significant issue and additional facilities to ensure these products are	**Appendix 17.2 Waste and Recycling Strategy (APP-189)** has been prepared as an 'indicative document that is intended to inform the preparation of Site Waste Management Plan(s) (SWMP) during the decommissioning phase of the Proposed Development'. The SWMP will be prepared as part of the preparation of the detailed Decommissioning Environmental Management Plan (secured via Requirement 19 of Schedule

	sustainably disposed of will be needed. The developer needs to be mindful that local facilities for recycling solar waste don't exist at present and this needs to be taken in account as part of any decommissioning plan.	2 in the **Draft DCO (Document Ref: 3.1)**) prior to decommissioning. The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
15.15	Following a review of the Waste and Recycling Strategy for each phase of the development, the Council wishes to highlight the following points: • Construction Phase – The Council note that the Applicant has not mentioned in the Waste and Recycling Strategy (APP-189, para 7.1.3) the potential waste arising from construction breakages of PV panels. Given that other NSIP scale solar developers have suggested a breakage rate of 0.2% of all panels, the Applicant should take account of, and prepare for the processing of, this large quantity of waste. • Operational Phase – As stated in the Applicant's Waste and Recycling Strategy (APP-189, para 7.2.5), there are likely to be PV panel failures during the Operational Phase of the development, and the applicant should therefore provide an estimate of the annual quantity of failed panels and what they intend to do with them. In light of other NSIP-scale solar farms suggesting an annual failure rate of up to 0.5%, the Applicant should either revise or justify their stated 0.2% assumption. The Applicant should also clarify the basis of their assumption (APP-189, para 7.2.7) that sufficient capacity for treatment and recycling of PV panels will appear	**Appendix 17.2 Waste and Recycling Strategy (APP-189)** has been prepared as an 'indicative document that is intended to inform the preparation of Site Waste Management Plan(s) (SWMP) during the decommissioning phase of the Proposed Development'. The SWMP will be prepared as part of the preparation of the detailed Decommissioning Environmental Management Plan (secured via Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**) prior to decommissioning. The Site Waste Management Plan(s) document will expand upon the breakage rate, asserting a 0.2% rate based upon other trends of similar Nationally Significant Infrastructure Projects (NSIP) developments. Further details are provided in LIR 17.12 on cumulative wastes with failure rates.

	in time to handle the cumulative quantity of failed panels from projects across our area which are likely to commence operations on a similar timeframe. • Decommissioning Phase –no forecast of the quantity of waste, particularly PV panels anticipated at the end of the project has been provided. This is vital given the limited capacity of recycling facilities for PV panels at present, and should be accompanied by a forecast of the cumulative quantity of waste arising from other NSIP-scale solar farms locally which would be decommissioning on a similar timescale.	
15.16	For all phases of the development the applicant is placing considerable reliance on the market response to demand for recycling facilities. Even if it could be assumed that the market would respond to the demand for recycling facilities, it is uncertain where the capacity would be provided. Where possible, local waste facilities should be used but, given that they may not be available locally, transport should be taken into account in assessing the emissions arising from waste.	**Appendix 17.2 Waste and Recycling Strategy (APP-189)** has been prepared as an 'indicative document that is intended to inform the preparation of Site Waste Management Plan(s) (SWMP) during the decommissioning phase of the Proposed Development'. The SWMP will be prepared as part of the preparation of the detailed Decommissioning Environmental Management Plan (secured via Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**) prior to decommissioning. At this stage, facilities for recycling solar waste will be taken into account with appropriate transport options selected to reduce emissions as part of the wider sustainability initiatives of the Decommissioning Environmental Management Plan.
15.17	The Council, in its role as Waste Planning Authority, has a statutory duty to prepare a Waste Local Plan that ensures sustainable waste management within its jurisdiction. The Council must assess the existing and future generation of waste arising over the plan period, and produce a	This statement has been reviewed and is noted by the Applicant.

	comprehensive, long-term plan to identify sufficient opportunities to meet the identified waste management needs of the area, aiming to drive waste management up the waste hierarchy. This involves setting strategic policies, engaging with stakeholders and the public, identifying sites and facilities, where a need is identified, and aligning with national planning policy. The plan must also safeguard existing waste facilities, promote waste reduction and recycling, and support the transition to a circular economy. This process relies on having a complete set of data on the likely waste streams, which we currently do not have for potential future solar waste. Whilst it may be possible for sites to be identified in the plan, it would then still fall to the market to deliver the facilities.	
15.18	Notwithstanding the need to assess the quantity of PV panels which may need to be recycled, the applicant's documentation should reflect an intention to attempt to minimise waste and reuse/repair where possible in accordance with the Waste Hierarchy.	Paragraph 1.1.5 of **Appendix 17.2 Waste and Recycling Strategy (APP-189)** states that "To ensure the promotion of good practice and sustainable development, the Developer will seek to ensure that any/all waste generated in developing the Site is minimised or otherwise reused, recycled, recovered or, if necessary, disposed of in accordance with the waste hierarchy**".** Within paragraph 1.1.6 of Appendix 17.2, **'**Preparing for Reuse' is defined as *"checking, cleaning, repairing, refurbishing, whole items or spare parts***".**
15.19	It is noted at paragraph 7.3.1 of APP-189 that a Site Waste Management Plan (SWMP) would be included as part of the detailed DEMP and this is secured through requirement 18(3) of the draft DCO. A SWMP should be produced for all stages of the development and it is noted at paragraph 5.5.2 of the oCEMP that there is a similar commitment to produce a SWMP with the CEMP. However, no such commitment to produce a SWMP is apparent for the	This statement has been reviewed and is noted by the Applicant. The operational phase will be accounted for in the SWMP.

	operational phase. The Council would have expected the application to also include an Operational Environmental Management Plan but this appears to be absent from the DCO submission.	
15.20	On the basis of the above and until such time as the applicant can provide further information, the Council consider the development would have a **negative** impact in terms of waste. The Council would be happy to engage further with the Applicant regarding these matters, including through the SoCG.	This statement has been reviewed and is noted by the Applicant. The measures discussed throughout **Appendix 17.2 Waste and Recycling Strategy (APP-189)** will aim to ensure that the impact is minimised wherever possible and will therefore not be a Significant impact. Appendix 2.5 ODEMP (Document Ref 6.3, Vol.2, 6.3.8) has been submitted as part of this DCO Application. The detailed DEMP must be substantially in accordance with Appendix 2.5 ODEMP (Document Ref 6.3, Vol.2, 6.3.8) and will further ensure the reduction of the impacts arising from waste. Any waste generated from decommissioning at the end of life will be managed in accordance with the SWMP(s) prepared and as part of the detailed DEMP(s).
16	**Fire Safety**	
16.1	Paragraph 1(8) of Schedule 4 to the EIA Regulations requires consideration to be given to the risks of major accidents and disasters but does not include a definition of these terms. The regulations, however, specifically refer to effect on human health.	Consideration to the risks of major accidents and disasters have been considered within Section 17.5 of **ES Chapter 17 Other Environmental topics (APP-068),** with effects on human health being assessed throughout. Table 17.3 of **ES Chapter 17 Other Environmental topics (APP-068)** outlines specific Major Accidents or Disasters and how they are assessed within the ES and other application documents. The **Outline Battery Safety Management Plan ('OBSMP') (APP-279)** outlines the measures in place in order to promote

		fire safety on site and mitigate the potential for any fire events at the BESS. This is to be secured by requirement at Schedule 12 of the **Draft DCO (Document Ref: 3.1)**.
16.2	EN-1, EN-3 and EN-5 are silent regarding consideration of major accidents and disasters and other safety issues which may arise specifically from solar PV development and associated energy storage systems as well as electricity networks infrastructure.	This comment is reviewed and noted.
16.3	The Planning Practice Guidance section on 'Renewable and low carbon energy' provides specific guidance regarding potential risks arising from BESSs, including engagement with the relevant local fire and rescue service so that its views can be taken into account regarding potential mitigations which could be put into place in the event of an incident.	Section 2.6 of the **OBSMP (APP-279)** outlines how the Planning Practice Guidance ('PPG') was the primary guidance used. It outlines that the detailed BSMP, which must be submitted to, and approved by, the relevant planning authority (LCC) prior to construction of the BESS in accordance with Requirement 6 in Schedule 2 to the **Draft DCO (Document Ref: 3.1)**, will incorporate the prevailing legislative requirements, guidance, and standards Section 6.2 of the **PS (APP-277)** outlines how engagement has been held with Lincolnshire Fire and Rescue Service on the principles of the **OBSMP (APP-279)** and the general layout and access arrangements, and they will also be consulted in the preparation of the detailed version of the **OBSMP (APP-279)** that must be produced, approved and implemented pursuant to Requirement 6 in Schedule 2 to the **Draft DCO (Document Ref: 3.1)**.

16.4	Local Policies: • CLLP Policy S53: Design and Amenity • CLLP Policy S54: Health and Wellbeing	This comment is reviewed and noted. These policies have been assessed within Appendix 4B of the **PS (APP-277)**.
16.5	Part (7) of CLLP policy S53 'Design and Amenity' requires development to avoid adverse impacts associated with noise and vibration taking into account surrounding uses nor result in adverse impacts upon air quality from odour, fumes, smoke, dust and other sources	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**. In relation to air quality, it is considered that no further work is required as **Chapter 16 Air Quality (APP-067)** of the Environmental Statement (ES) concludes that no significant adverse impacts are anticipated.
16.6	Policy S54 seeks to ensure that where any potential adverse health impacts are identified the developer will be expected to demonstrate how these will be addressed and mitigated.	This comment is reviewed and noted. Appendix 4B of the **PS (APP-277)** outlines how the potential impacts of the Proposed Development of relevance to human health were considered by the Applicant throughout the **ES (APP-050 to APP-070)** within the relevant chapters and demonstrates that health impacts have been considered across the Proposed Development and, with the application of suitable mitigation measures, are not significant.
16.7	There is potential for negative effects to arise as a result of fire safety risk from this development. The potential impacts from major accidents and disasters are considered in Chapter 17 (Other Environmental Topics) of the ES (APP-068). Table 17.3 of APP-068 identifies Fire as posing a major accident or disaster risk, sensitive receptors are identified as local residents, habitats and species. The main potential hazard of BESS failure is stated to be thermal runaway and, if not controlled, fire. The applicant sets out key fire safety provisions for the BESS in the outline Battery Safety Management Plan (oBSMP) (APP-279) submitted with the DCO application. In recognition of	This comment is reviewed and noted.

	the emerging technology of BESS and the challenges this poses to Fire and Rescue Services the National Fire Chiefs Council circulated a letter to all Chief Fire Officers on the 22 August 2023 drawing attention to the updating of Renewable and Low Carbon Energy Planning Policy Guidance that was updated in August 2023 by the Department of Levelling Up, Housing and Communities to include reference to BESS9.	
16.8	The planning policy guidance encourages planning authorities to consult with their local Fire and Rescue Service as part of formal planning consultations and directs developers to the National Fire Chiefs Council guidance on BESS schemes. From discussion with Lincolnshire Fire Service (LFR) who have developed standing advice for BESS10 based on national guidance, a program of monitoring and risk assessment has been identified as necessary once the BESS has been established to ensure it complies with the Battery Management Safety Plan and Emergency Response Plan. During the first year of operation this will involve 21 days of work for the Fire Service and then two days in each subsequent year for the lifetime of the development.	The **Statement of Common Ground with Lincolnshire County Council (XX)** as updated at Deadline one outlines in within Table 2.1 the details of the applicant's consultation with the LFR. A meeting introducing LFR to the Proposed Development took place on 27 October 2023. Following this, LFR were consulted via a s42 statutory consultation letter which advised the commencement of statutory consultation period and provided information on the project. LFR returned an initial response to this consultation on 31 January 2024 and provided confirmation on 08 March 2024 that the project changes do not change their initial advise. LFR returned a more detailed response on 25 April 2024. Following this, a meeting between the applicant and LFR took place on 10 May 2024, where legislation and guidance were discussed, as well as the specifics of the Proposed Development including access, layout and water supply options. Following this, the applicant responded to the matters raised by LFR in the s42 consultation on 24 May 2024. LFR were sent a targeted consultation letter on 13 December 2024. An email regarding the framework for draft protective provisions was sent to LFR on 20 December 2024, with a response received from LFR on 12 February 2025 confirming that LFR were happy with the protective provisions

		The abovementioned SoCG also sets out the agreement between the Applicant and LFR with regards to protective provisions included within Part 6 of Schedule 11 of the **draft DCO (Document Ref. 3.1),** the latest version of which is to be submitted alongside this document at Deadline 3. This includes provision for costs related to an annual review of the Site of LFR throughout operation. The Applicant notes the advice from LFR. It is considered that when a detailed Battery Safety Management Plan is drafted and submitted, as secured by Requirement in the draft DCO, this will include the prevailing advice at the time, including incorporating a suitable programme of monitoring and risk assessment.
16.9	The need for this monitoring and assessment will enable early engagement to ensure the required standards are being complied with; to ensure the BESS is constructed to the correct standards with support from the Fire Service; early development of emergency response plans; familiarisations of the BESS for local fire crews and overview by the Fire Service; development of on-going maintenance and updating risk information; and assurance for local residents and communities that the BESS are being independently inspected and monitored to reduce the risk of a fire.	As above.
16.10	A Protective Provision for Lincolnshire Fire and Rescue is included in the draft DCO (APP-039) Schedule 11, Part 6 that would facilitate site inspections, annual reviews and payment of costs to LFR for monitoring of the BESS facility which is considered to be acceptable.	The Applicant notes that the Lincolnshire Fire and Rescue Protective Provision is considered to be acceptable.

16.11	**Outline Battery Safety Management Plan** LFR has reviewed the oBSMP and provided the following comments at this stage: • The current oBSMP at this stage contains generic information, e.g., BESS enclosures, battery technology to be employed etc. LFR will need to be sighted on specific details as they become available, e.g., spacing distances, safety measures based on battery technology and compliance with specific standards. • Installation Standards – Further details will be required as they become available, at this point they are generic. • LFR will require further details on suppression systems to be installed at the design phase within the BESS containers. • Details on site access and accessibility around the site is generic and will also require further details as they become available. • LFR consider that the oBSMP document provides a good framework that mentions all required areas, but as with the above points, LFR encourage on- going engagement as the design phase progresses, and maintain the right to highlight areas that are not compliant with national guidance.	The Applicant notes confirmation from LFC that the oBSMP provides a good framework and mentions all required areas. Requirement 6 in Schedule 2 to the **draft DCO (Document Ref: 3.1)** stipulates that prior to the commencement of construction of the BESS, a detailed BSMP (which must be substantially in accordance with this OBSMP) must be submitted to and, in consultation with NKDC and LFR, approved by LCC.
16.12	However, in the absence of more detailed information, such as comprehensive plans, the response is primarily based on the content provided within the application documents. It is important to note that Requirement 6 of the draft DCO mandates the submission and approval of a	As above.

	detailed BSMP by the Council, in consultation with LFR and NKDC.	
16.13	The Fire Service remains committed to ongoing engagement throughout the examination process and wishes to have its views considered as specific elements of the fire strategy emerge. Subject to Requirement 6 and the Protective Provision for LFR, which would ensure the Fire Service has sufficient resources to conduct regular inspections of the BESS, being secured in any DCO that may be granted, the development's impact on fire safety and pollution is currently assessed as **neutral**, provided all mitigation measures are properly implemented and maintained throughout the project's duration.	The Applicant remains committed to ongoing engagement throughout the examination and post-consent, as secured by Requirement 6 and the LFR Protective Provision within the **draft DCO (Document Ref: 3.1)**.
17	**Cumulative Effects**	
17.1	The EIA Regulations at Schedule 4 require that an ES should include "a description of the likely significant effects on the environment resulting from, inter alia, (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources."	**Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and assess these developments. The potential inter-cumulative impacts are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental Statement (ES) and assessed within **Chapter 18 Cumulative Effects (APP-069)**. It is considered that a proportionate and robust approach has been adopted in terms of identifying and refining the other developments (in agreement the host local authorities) for consideration within the ES, and the assessment undertaken to accord with Schedule 4 of the EIA Regulations.

17.2	NPS EN-1 in section 4 (Assessment Principles), paragraph 4.1.5 states "In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy."	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**.
17.3	Whilst the development plan for the area does not contain any specific stand-alone policies for the consideration of cumulative impacts, CLLP Policy S14 (Renewable Energy) is of relevance for this proposal as it requires cumulative impacts to be taken into consideration when considering the acceptability of development proposals.	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**. The potential inter- and intra-cumulative impacts are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental Statement (ES) and assessed within **Chapter 18 Cumulative Effects (APP-069)**.
17.4	Policy S14 outlines proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect and cumulative impacts on the following considerations are, or will be made acceptable. The following tests will have to be met: (i) The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the historic landscape; and highway safety and rail safety; and (ii) The impacts are acceptable on aviation and defence navigation system/communications; and (iii) The impacts are acceptable on the amenity of sensitive neighbouring uses (including local	The performance of the Proposed Development against this policy is appraised in the **PS (APP-277)**. Potential direct, indirect, inter-cumulative and intra-cumulative impacts are considered, as appropriate, within **Chapters 6** to **17 (APP-057 to APP 068)** of the Environmental Statement (ES), and summarised within **Chapter 18 Cumulative Effects (APP-069)** and **Chapter 19 Summary of Significant Environmental Effects (APP-070)**. As detailed within **Chapter 18**, there will be only one significant adverse intra-cumulative effect on one receptor, which is the Church of St Andrew at Asgarby, a Grade I Listed Building (NHLE 1061832). The intra-cumulative impact will be during the construction phase, only, and will be short-term, temporary and reversable. There will also be one significant adverse inter-cumulative effect on one receptor, which agricultural land. This will also be temporary and will be

	residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.	reversible at the decommissioning phase. As detailed within **Chapter 19**, there will be significant adverse effects in terms of landscape and views, setting and agricultural land, all of which a temporary and reversible. There will also be significant beneficial effects in terms of BNG, climate change and socio-economics. No unacceptable impacts are identified.
17.5	The Applicant's assessment of cumulative effects is set out in ES Chapter 18 - Cumulative Effects (APP-069). It considers intra-cumulative effects, the interactions between residual impacts of the Proposed Development (in isolation) likely to be experienced for each type of receptor and inter-cumulative effects where there is the potential for the Proposed Development to result in significant effects in combination with other developments. In considering inter-project cumulative effects, the ES considered both a long-list and a short-list of projects after consultation with the Council (Appendix 4.1 (APP-081) and 4.2 (APP-082)).	This statement has been reviewed and is noted by the Applicant. The potential inter-cumulative impacts and intra-cumulative impacts are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental Statement (ES) and assessed within **Chapter 18 Cumulative Effects (APP-069)**. In terms of potential inter-cumulative impacts, **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and assess these developments**.**
17.6	The short list of cumulative sites in Appendix 4.2 includes 21 NSIP projects and 47 other existing or proposed developments. Appendix 4.2, dated April 2025, is considered by the Council to now require updating. The assessment should be revised to reflect the current status of other developments (some of which are not up to date), to include the solar farm located on land south of Little Hale Drove (NKDC Ref: 23/1021/FUL), which was granted planning consent on appeal on 13 August 2025. The	The short list of cumulative sites in Appendix 4.2 includes 21 NSIP projects and 47 other existing or proposed developments. Appendix 4.2, dated April 2025, is considered by the Council to now require updating. The assessment should be revised to reflect the current status of other developments (some of which are not up to date), to include the solar farm located on land south of Little Hale Drove (NKDC Ref: 23/1021/FUL), which was granted planning consent on appeal on 13 August 2025. The update should also

	update should also incorporate other emerging NSIP proposals, such as Ossian Offshore Wind and National Grid's EGL5 and the Weston Marsh to East Leicestershire schemes.	incorporate other emerging NSIP proposals, such as Ossian Offshore Wind and National Grid's EGL5 and the Weston Marsh to East Leicestershire schemes.
17.7	The inter-project cumulative effects have been assessed within technical chapters 6 to 16 of the ES, with a summary of the findings presented in Table 18.3 of APP-069. Further updates to the relevant cumulative assessments within the topic chapters should then be undertaken where necessary. The assessment of inter-project cumulative effects should be kept under review as the Beacon Fen project progresses through examination and the lists and assessments updated as information becomes available.	Section 4.6 of **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and assess these developments.
17.8	The nature and scale of current and emerging proposals relating to large scale solar developments and other NSIP scale developments in Lincolnshire is significant. At the time of writing this report 5 NSIP scale solar schemes have been granted a DCO in Lincolnshire and a further 8 schemes (including Beacon Fen) are either progressing through examination or are at pre application stage. In addition the County is host to a further 10 NSIP proposals including five Great Grid Upgrade proposals and a new Lincolnshire reservoir. The cumulative effects of the Beacon Fen Energy Park, in combination with other major infrastructure developments identified, could be considerable. These impacts, in particular impacts on landscape character and visual amenity, ecology, waste management (from construction, operational and decommissioning activities), socio-economic factors, and the permanent loss of BMV agricultural land have been considered in greater detail within the relevant topic-specific chapters above. The Cumulative Development	Section 4.6 of **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments (including the Nationally Significant Infrastructure Projects (NSIP)) that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**). Paragraph 4.6.11 of Chapter 4 explains that the locations of the shortlist schemes are illustrated on **Figure 4.1 Cumulative Development: Nationally Significant Infrastructure Projects (APP-201)** and **Figure 4.2 Cumulative Development: Local (APP-202)**, and states that "*The cut-off date for the cumulative assessment was 31st December 2024*". Whilst point data was used on Figure 4.1 to illustrate the location of each scheme relative to the Proposed Development, each one was reviewed in detail in relation to the potential inter-cumulative impacts considered within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental

	NSIP Map provided in ES Volume 3, 6.4.10 Figure 4.1 (APP-201) only shows point data with regard to the location of other NSIPs within and adjacent to Lincolnshire – this does not provide a true depiction of the extent and location of NSIPs, including the scale and number of linear transmission schemes such as Eastern Green Links 3 and 4, and Grimsby to Walpole National Grid Schemes. On that note, both the Ossian and Outer Dowsing Transmission Routes have been omitted from the plan.	Statement (ES) and assessed within **Chapter 18 Cumulative Effects (APP-069)**.
17.9	There remains a potential for cumulative impacts with other solar developments on ground nesting birds. As such the Council does not agree with the applicant's conclusion in table 18.3 of APP-069 that no inter-cumulative effects are anticipated.	The Applicant has made provisions to minimise the impacts on ground nesting birds outlined in Section 7.6 of the **Chapter 7 Ecology 7 Ecology (APP-058)**. These include enhancing the value of grassland, including buffer strips along water courses and residential buffers, and fencing off areas to avoid mammals (including badgers and hedgehogs) eating ground nesting bird's eggs. These measures, secured in **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** secured pursuant to Requirement 12 of the Draft DCO **(Document Ref: 3.1)**, are expected to mitigate for impacts on ground nesting birds. Taken into account with mitigation measures on other proposed developments there are expected to be no significant cumulative effects on ground nesting birds.
17.10	In relation to effects on landscape character and visual amenity the Council does not agree with the conclusions in table 18.3 of APP-069. As summarised in Section 7 above the cumulative landscape and visual effects with other renewable energy and infrastructure projects across the county present a further concern. Whilst the immediate cumulative schemes within the ES are relatively modest, the scale of other NSIP's and large-scale energy projects	**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 (as detailed within Section 6.4 of **Chapter 6**)). In relation to the other developments considered within the LVIA, it has been found that there will be no significant

	proposed in the wider area raises the potential for extensive alteration of the regional landscape character. The combined effect of these developments could be a marked and enduring change, both directly through a change in land use and introduction of solar as a key element, and also in the perception and experience of the landscape, particularly for visual receptors travelling through the landscape and experiencing sequential effects. This is a clear and marked change to landscape character.	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. Sequentially, the Proposed Development is substantially geographically separated from these schemes with limited potential for meaningful visual associations to be experienced in relation to other solar development.
17.11	As the Waste Planning Authority, the Council is also concerned about the impact from waste arising from solar developments and the lack of existing waste capacity as described above. The waste arisings from these proposals combined, during the construction and operational phases as well as at decommissioning is potentially significant. It must also be highlighted that there is no Waste chapter in the ES having been scoped out.	This statement has been reviewed and is noted.
17.12	Waste management is considered in the Waste and Recycling Strategy (APP-189), however it does not provide any meaningful or quantified assessment of cumulative waste arisings, particularly at decommissioning but also with construction and operational failures and repowering, particularly in terms of waste management capacity. We would therefore expect to see an updated Strategy including forecasts of waste, and particularly PV panels, for each phase of the project – e.g., the Applicant's stated	The Applicant considers that **Appendix 17.2 Waste and Recycling Strategy (APP-189)** is designed as an initial outline of how wastes will be managed onsite. As such, further details on waste quantities will be outlined in the detailed Site Waste Management Plan (SWMP) at the detailed design stage. For further details relating to the preparation of SWMPs, please refer to Section 5 of **Appendix 2.4 Outline Construction Environmental Management Plan (OCEMP) (REP1-009 to REP1-010)** and Section 1.12 of **Appendix 2.5**

figure of a 0.2% failure rate of panels per annum is broadly in line with other NSIP applications but should be converted to an annual tonnage and shown alongside other projects as a cumulative figure.

Outline Decommissioning Environmental Management Plan (ODEMP) (REP1-011 to REP1-012), secured via Requirement 12 and 18 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**, respectively. The final SWMP will be substantially in accordance with **Appendix 17.2 Waste and Recycling Strategy (APP-189)**, with confirmed details of waste type and quantities (available) included, which will then establish how tonnages would arise from Site. As such, providing detailed values and quantities at this stage is not considered proportional.

The detail contained within the **OCEMP**, **ODEMP** and **Appendix 17.2 Waste and Recycling Strategy (APP-189)** sufficiently demonstrates how waste from the Proposed Development will be managed. Notwithstanding the Applicant's position set out above, it provides the following information as supplementary detail to assist LCC's understanding of the waste position. The Applicant does not consider an update to **Appendix 17.2 Waste and Recycling Strategy (APP-189)** is required,

Anticipated outline volumes during construction and operation would be:

Waste Stream	Destination	Estimated Volumes
Cardboard	Authorised recycling, worst case, landfill	From packaging- could be a moderate volume
Wood	Authorised recycling, worst case, landfill	From packaging- could be a moderate volume

Plastic	Authorised recycling, worst case, landfill	Limited
Metal	Authorised Recycling – Metal Recycler	Limited
Paint and Solvents	Authorised recycling, worst case, landfill	Limited
Chemical containers	Authorised recycling	Limited

Decommissioning waste is expected to be minimised to landfill as predominant waste streams in this phase will be the recycling of solar PV infrastructure. Whilst a failure rate of 0.2% is anticipated for solar panels, this will represent a negligible volume of that will be recycled throughout the operational lifetime of the Site that will be added to cumulative sources, given they will be batched and then sent for recycling- circa 52 tonnes. During the decommissioning phase, the waste will be associated with removing the Proposed Development in anticipated volumes are expected to be:

Waste Stream	**Destination**	**Estimated Volumes**
Solar Panels	Authorised recycling	Significant volume
Batteries	Authorised recycling	Significant volume
Concrete or foundation structures (inclusive of metal / composites)	Authorised recycling, worst case landfill	Significant volume

Hardcore or material used for tracks	Authorised recycling, worst case landfill	Moderate Volume
Electrical Equipment	Authorised recycling	Significant Volume
Metal	Authorised recycling	Significant volume
Welfare facility waste	Authorised recycling	Limited Volume

Furthermore, it is not possible to fully determine volumes of wastes anticipated from other Nationally Significant Infrastructure Projects (NSIP) solar developments within Lincolnshire. This information is not publicly available (beyond panel counts), and it is, therefore, not possible to compare tonnages versus other projects due to the discrepancy in panel weights as a cumulative figure (this is not admissible at present). However, based on the Lincolnshire County Council (LCC) Local Impact Report (LIR) Appendix 3 figure, an approximate calculation has been developed based on a 29kg = 500w panel assumption as a rough figure to illustrate cumulative tonnage and how Beacon Fen compares to other NSIP facilities in panels and panel infrastructure (excluding batteries, soil movements and roads). This is inclusive of the expected failure rate of panels per annum, derived from Appendix 3 of the Authority LIR.

NSIP Site	Tonnage of Solar Panels for and Associated Infrastructure for Disposal	Annual Tonnes of PV Failure Rate (where not known, 0.2% rate of panels failing used as per Beacon Fen)
Beacon Fen	25,945	52

Fosse Green	15,567	8
Heckington	25,945	52
Tillbridge	32,431	65
Cottam	38,917	78
West Burton	31,134	125
Gate Burton	34,377	69
Mallard Pass	22,702	45
One Earth	47,998	96
Meridian	48,647	97
Leoda	38,917	78
Springwell	51,890	104
TCPA	59,024	118
Total NSIP Tonnage	473,493	986

As set out in **Appendix 17.2 Waste and Recycling Strategy (APP-189)**, where panels fail, replacements will take place and the old panels will be recycled through appropriate recycling schemes in the United Kingdom or outside of the UK.

17.13	Based on currently available data, the Council estimates that, should all solar NSIPs and Town and Country Planning Act (TCPA) schemes in Lincolnshire be consented, the cumulative number of solar panels potentially requiring recycling or disposal at the point of decommissioning could be in the region of 15 million units. While the Council acknowledges that decommissioning is a long-term consideration, we are increasingly concerned about the ongoing annual failure rates of solar panels across these schemes. Even a modest failure rate of 0.2% would result in approximately circa 31,000 panels requiring replacement each year. It is important to note that some schemes are reporting higher annual failure rates, which could significantly increase this figure. Further detail and the Council's methodology behind these estimates is provided in Appendix 3.	This statement has been reviewed and is noted. The Applicant considers that, in line with the above responses, more companies / facilities are expected to setup / become available in the next decade in order to process solar panels as the current solar farms begin to be decommissioned. Technology removed prior to the end of the Proposed Development's operational life will be recycled as far as possible and will undergo the same process as outlined within the response(s) above. This is not an area that can be fully assessed as the failure rate is likely to alter dependent on technology selected and type utilised. It is likely for other construction or operational wastes produced that they will be processable within the United Kingdom, based on current market capacity for waste tonnage. Where wastes will not be processed within the United Kingdom, it is not feasible to assess wider solar panel market capacity to recycle panels, although it is known a large market exists beyond the United Kingdom to do so.
17.14	In the absence of the aforementioned forecasts of waste arisings tonnages, the Council do not agree with the applicant's conclusion at paragraph 7.3.6 (APP–189) that the cumulative effects from other solar NSIPs would be negligible.	This statement has been reviewed and is noted. Whilst potential inter-cumulative effects are not negligible if occurring at the same period of time, it is likely that, owing to the tonnage cascading at different points across the next 40 years, there is unlikely to be an immediate overlap in the capacity for hauliers and local companies to transport the wastes produced during the construction, operation and decommissioning phases within the same time period managed within and beyond the United Kingdom; particularly in the latter where it is likely offtakers would sequence how materials arrive and are processed at decommissioning in collaboration with NSIP-level solar farms. Materials would be phased in terms of how they would be removed from the Site. This will be developed further as part of the detailed Site Waste Management Plans (SWMP) for inclusion within the Construction environmental

		Management Plan (**REP1-009 to REP1-010**) and the Decommissioning Environmental Management Plan (DEMP) APP-078) (secured via Requirement 12 and 18 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**, respectively), where information is feasible to be identified. This has been addressed in paragraph 4.1.6 of **Appendix 17.2 Waste and Recycling Strategy (APP-189)**, where it is commented that the details are unknown due to the uncertainty around staffing and panel numbers, etcetera, meaning that it is not possible to assert arisings, but it is probable to be negligible due to decommissioning taking place through different time periods.
17.15	In light of the Council's concerns regarding the provision of recycling facilities in the shorter term given the potential annual cumulative impact of panel failures from solar farms across Lincolnshire, the Council welcomes the proposal for a requirement in the Springwell DCO put forward by the ExA to limit the number of solar panels replaced over the lifetime of the authorised development to 5%, with the percentage figure provided annually to the relevant planning authority.	The Applicant strongly opposes the imposition of such a requirement. This comment correctly identifies the concern as being the impact of replacement of parts, rather than the activity itself. It follows from that, that it is appropriate to put measures in place to control and monitor the impact, rather than placing a percentage restriction on the panel replacement. The difficulty with imposing a 5% restriction on panel replacement is that this does not bear a direct relationship to the impact of the replacement. For example, there is no suggestion or evidence that, if 5.5% or 7% of panels was replaced over the 40 year operational lifetime of the Proposed Development, that this would result in environmental effects materially new or different to those assessed in **Appendix 17.2 Waste and Recycling Strategy (APP-189)**. The Applicant notes that the Springwell DCO has not yet been made by the Secretary of State and the latest draft of the DCO for that project put forward by the applicant in that project does

		not include such requirement. Accordingly, Springwell is not a precedent for such requirement being imposed.
17.16	Altogether, Lincolnshire is a host authority to 23 NSIPs which are at various stages in the application process. The Council is concerned about the effects of this potentially significant industrialisation on its local landscape, public access, agriculture, historic and natural environment, and community. The impact on the perception of the county by visitors and tourists as well as residents and businesses is also material to the local economy. The Council is concerned that the socio economic impacts of this development in combination with other NSIPs have not been meaningfully or fully considered. A number of NSIPs within a 25km radius have also been erroneously excluded from the cumulative list in Chapter 15, and as such the potential adverse impacts on sensitive receptors across all stages of the potential development have been underestimated.	This statement has been reviewed and it is noted by the Applicant that the Council is of the opinion that potential impacts recorded in **Chapter 15 Socio-economics (APP-066)** have been underestimated. Section 4.6 of **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and to assess these developments**.** As detailed within paragraph 4.6.13 of Chapter 4, "*The assessment will be proportionate, with regard to the certainty of information available on other developments. Where significant cumulative effects are only likely to arise in relation to one environmental aspect area, the assessment will focus on that issue only. The criteria for determining the significance of any cumulative effect will be based upon:* • *The duration of effect, i.e. will it be temporary or permanent;* • *The extent of effect, e.g. the geographical area of an effect;* • *The type of effect;* • *The frequency of the effect;* • *The 'value' and resilience of the receptor affected; and*

- *The likely success of mitigation.*

Within **Chapter 15 Socio-economics (APP-066)**, paragraph 15.8.2 states that "*The cumulative impact assessment focuses only on key shared receptors with other operational or planned projects in the Area of Influence (AoI). The Chapter identified two inter-cumulative effects 'the demand on local accommodation during the construction phase' and 'stress on local services, due to an influx of construction workers'".* Following this, paragraph 15.8.3 then states that "*As the only impact being considered is that of effect on current accommodation, only projects within 25km have been considered, the determination of effects from each of the sites within 25km is provided in Table 15.17 Developments Considered in the Assessment*". Based upon professional judgement, this is considered a proportionate approach to the assessment of the inter-cumulative impacts identified. Table 15.17 within Chapter 15 details the projects considered, their respective development stage (at the time of the assessment) and whether they are scoped in or scoped out of the assessment (explaining why for each).

The assessment identified Significant adverse impacts in relation to both the 'demand on local accommodation during the construction phase' and 'stress on local services, due to an influx of construction workers'. However, as detailed within paragraph 15.8.9, mitigation will include the implementation of **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (APP-179)** (secured via Requirement 17 of the **Draft DCO (Document Ref: 3.1)**), disclosure of construction timescales with other developments when practical and co-operation with North Kesteven District Council (NKDC) to understand accommodation demands.

		Additionally, paragraph 15.8.9 states that "*If the overlap of peak construction months cannot be avoided, the Applicant will review accommodation capacity in NKDC during peak months and suggest alternative accommodation outside of NKDC if necessary*". With the mitigation measures (secured through the **Draft DCO (Document Ref: 3.1)**) in place, the residual effect could be reduced to Not Significant. It is considered that the approach taken to identify the other developments for consideration and the selection of those considered based upon the inter-cumulative effects identified is proportionate and robust.
17.17	The Council is particularly concerned about the cumulative impact of large scale solar development, on agricultural land. The applicant's summary at paragraph 18.5.3 of APP-069 is that there is potential for significant adverse inter-cumulative effects in relation to agricultural land in terms of the total agricultural land (and BMV land) lost due to the proposed development in combination with other developments. The Council agree with this statement, however as described in Section 12 above it is considered that the applicant's assessment underestimates the amount of BMV land affected by solar development in Lincolnshire.	This statement has been reviewed and it is noted by the Applicant that the Council is of the opinion that potential impacts recorded in **Chapter 14 Soils and Agricultural Land (APP-065)** have been underestimated. **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and assess these developments**.** Within **Chapter 14 Soils and Agricultural Land (APP-065)**, Section 14.12 considers the potential inter-cumulative effects, with Table 14.15 Cumulative Effects Assessment of Developments setting out the baseline conditions relevant to the projects within the Lincolnshire County Council administrative boundary considered to have the potential for a

		cumulative effect with the Proposed Development in accordance with the scope set out within Chapter 4. The inter-cumulative impact assessment within Chapter 14 considered all twenty-one of the Nationally Significant Infrastructure Projects (NSIP) within Appendix 4.2 and twenty-six non-NSIP schemes. In terms of the soil resource, as per paragraph 14.13.34, there are no cumulative effects identified. In terms of the loss of loss of agricultural land, however, paragraph 14.13.35 states that "*When considering the impact of all considered developments (within Table 14.15) across the Lincolnshire County Council administrative area, 2% (11,962.85 ha) of all the agricultural land is involved of which 0.82% is (4,927 ha) BMV land. The majority of the considered developments are solar developments where most of the land take may be considered temporary and reversible, with the permanent land take limited to areas of built development. Assuming that the embedded mitigation allows for reinstating these sites to agricultural production and that the soil resources are protected during all phases of the developments, the inter-cumulative impact is deemed to be Moderate (Significant)*". It is considered that the approach taken to identify the other developments for consideration and the selection of those considered based upon the inter-cumulative effects identified is proportionate and robust.
17.18	The cumulative loss of all agricultural land for arable production when combined with other projects across the District and County, is considered to be potentially cumulatively significant in terms of food production and security and the residual socio-economic impact of this	This statement has been reviewed and it is noted by the Applicant. See response provided within LCC LIR 12.28.

	loss. A recent report, UK Food Security – Outlook to 205011, published by the think-tank Science for Sustainable Agriculture echoes these concerns and warns that up to 23% of the country's farmland could be lost to competing land-use demands by mid-century, including from solar energy and dramatically reducing the nation's ability to feed itself.	
17.19	The potential for significant inter-projects effects to arise from this development in combination with other developments is of particular concern and as such the Council's position on cumulative impacts in the overall balance is **negative**. The Council will make further comments on the potential cumulative impact of the development with other NSIP proposals as further information on the other projects comes forward.	This statement has been reviewed and it is noted by the Applicant. Only one significant adverse inter-cumulative effect has been identified. This is detailed within paragraph 18.5.3 of **Chapter 18 Cumulative Effects (APP-069)**, which states that "*There is potential for significant adverse inter-cumulative effects in relation to the following: Agricultural land in terms of the total agricultural land (and BMV land) lost due to the Proposed Development in combination with the other developments. When considering all the considered developments within the administrative boundaries of Lincolnshire County Council boundary, they equate to 2% (11,962.85 ha) of the agricultural land, of which 0.82% (4,927 ha) is BMV land.*" This impact will be temporary and will cease upon decommissioning of the Proposed Development.
18	**Other Topics**	
18.1	**Decommissioning** The Council is concerned that the applicant's Funding Statement does not evidence how decommissioning would be funded or for dealing with long-term shutdowns. To address this, the Council recommends adding a Requirement to the draft DCO that would ensure funding is in place for decommissioning, both after a long outage and at the end of the project's life. The Council would draw the	The Applicant makes references to its response to Action Point 1 from Issue Specific Hearing 1, included within the **Written Summary of Oral Submissions from ISH1 and Responses to Action Points (REP1-030)** which provides clarifications on the intended funding mechanism for the scheme and how it proposes to ensure that funding obligations are in place for all stages of the development, including decommissioning.

	ExA's attention to two other NSIP projects where this has been considered: • Helios Renewable Energy Project – The draft DCO12 includes provision (Requirement 5(3)) to require the developer to notify the Local Planning Authority that the undertaker has put in place the requisite decommissioning security. • Oaklands Farm Solar Park – page 8, paragraph 4.22 of the SOS's decision letter13 states that 'the Applicant stated a fund was not necessary since Requirement 22 of the dDCO secured decommissioning of the site, was legally enforceable, and was consistent with recent precedent. The Applicant considered its funding statement as part of the application demonstrated it had sufficient funds to construct, operate and decommission the Proposed Development.' This reinforces the Council's argument that if it is not demonstrated that decommissioning funding is not suitably covered within the Funding Statement, then it would be in public interest to ensure that it is covered in the draft DCO by way of an additional Requirement.	In respect of decommissioning, Requirement 19 of the draft DCO provides that decommissioning of Work Nos. 1, 2 and 3 must commence no later than 40 years following the date of final commissioning of the authorised development. This requirement also provides that, unless otherwise agreed in writing with the relevant planning authority, no later than 12 months prior to the date the undertaker intends to decommission any part of the authorised development, the undertaker must notify the relevant planning authority of the intended date of decommissioning.
18.2	The Council may wish to make further representations as appropriate during the examination and at issue specific hearings relating to matters that are not contained within this LIR. Therefore, the comments contained above are provided without prejudice to the future views that may be expressed by the Council in its capacity as an Interested Party in the examination process.	This statement has been reviewed and it is noted by the Applicant. No further comment required.

19	Draft DCO	
19.1	In addition to the comments provided under the relevant topic chapters above in respect of the draft DCO (APP-039), at this stage the Council wishes to raise the following points:	

DCO Article/ Part/ Schedule	LCC Comments	Suggested word
Part 1 Interpretation and Schedule 2 Requirements	The definition of 'maintain' is considered to be too broad and would potentially allow for wholesale replacement of solar panels. In line with comments made in section 15 of this report a requirement to limit the replacement of panels to the percentages stated in the application documents and an annual reporting requirement would be welcomed. The Relevant Planning Authority to be Lincolnshire County Council, as the waste planning authority.	LCC suggest wording similar to that proposed by EXA in its propos changes to the dr Development Consent Order (dDCO) for the Springwell Solar DCO application. The number of sc PV panels replac over the lifetime of the authorised development sha not exceed XX%. Details of the number of solar P panels replaced, including an over percentage figure that includes all previous years, sl be submitted to th

Definition of "maintain":

The Applicant has considered the most up to date precedent in recently made solar DCOs (the latest being the **Tillbridge Solar Order 2025**), and has updated the drafting of the definition of "maintain" in the Draft DCO as follows to make the limitations of the definition clear:

*""maintain" includes inspect, upkeep, repair, refurbish, adjust, alter, remove, reconstruct and replace in relation to the authorised development, **but not remove, reconstruct or replace the whole of,** the authorised development, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement; and any derivative of "maintain" must be construed accordingly;"*

In any event, any maintenance works which comprise the replacement of panels must not give rise to materially new or materially different environmental effects to those identified in the Environmental Statement. Section 9.6 of **Chapter 9 Access and Traffic (APP-060)** assesses the potential effects of maintenance and replacement of panels during the operational phase of the Proposed Development, stating that:

"*At this stage, the level of vehicle trips associated with component replacement (all types of electrical equipment) is expected to be considerably lower than the level of vehicle trips generated during the peak construction phase. For example, even in the instance that full panel replacement is chosen, this would be programmed in stages over a much longer period than the construction phase (when the panels*

		relevant planning authority on a yearly basis.	*will be installed more rapidly). BESS equipment is also likely to be replaced incrementally. This is because the generating station will be an operational asset on the national grid for which it is important to maximise the number of panels which are kept operational at any given time and avoid compromising the electricity generating capacity of the Proposed Development. It can therefore be seen that there is no proposal to install a large operational laydown area as part of the Solar Array Area. Otherwise, components would be replaced as and when required throughout the operational lifetime of the Proposed Development (circa. 40-year period). It is estimated that component lifetimes are intermittently dispersed over the Proposed Development's lifetime*." In light of the controls described above, and as noted above in the response to paragraph 17.15, the Applicant does not consider it necessary for the Proposed Development to require a replacement panel monitoring reporting scheme and would strongly resist the inclusion of this obligation. In recently made solar DCOs, the Secretary of State has not considered it necessary to require this sort of scheme and has instead been satisfied that the scope of the environmental assessment and definition of "maintain" are sufficient controls to ensure that there will be no unforeseen incremental environmental effects. The Applicant sees no reason why this application should be treated differently. The Springwell DCO cited by LCC has not yet been made by the Secretary of State and the latest draft of the DCO for that project put forward by the applicant in that project does not include such requirement. Accordingly, Springwell is not a precedent for such requirement being imposed.
Part 3 (Streets), Articles 11 and 12	As currently written these Articles would give the developer the right to undertake works with no further approvals from the Council. At this stage, the technical details have not been submitted or approved. The Council require highway works to be delivered via the Section 184 or Section 278 process (or equivalent agreement) which would also for consideration of detailed design and allow for the provision of a bond which, if the developer was unable to complete the	As referred to in section 10 above, the Council will expect the need for such further approvals to be included in the DCO application and it has been suggested this could be through the draft CTMP and the final CTMP to be approved by the Council under requirement 13 of the draft DCO.	

	works, the Council would be able to make the Highway safe.		**Application of the permitting scheme:** The Applicant has included the suggested wording in the **Draft DCO (Document Ref: 3.1)**, as a new Article 12. **Article 15 (Temporary prohibition or restriction of use of streets and public rights of way):** The Applicant does not consider that any amendments to the drafting of Article 15 are necessary (note in the latest draft of the DCO this is now Article 16). The drafting of the article is based on well established precedent from similar DCO schemes, the most recent example being Article 12 of the **Fillbridge Solar Order 2025**. The Applicant does not see a reason why the Draft DCO should depart from this established precedent. **Article 43 (Felling or lopping trees or removal of hedgerows):** The Applicant disagrees that Article 44 (note in the latest Draft DCO this is now Article 44) provides the undertaker with a "*blanket approval to remove hedgerows and protected trees without the need to notify the relevant authority or provide replacement planting*". This is because the exercise of the power in Article 43 can and must only be exercised in accordance with the requirements set out in Schedule 2 to the **Draft DCO (Document Ref: 3.1)** (see Article 3(1) of the **Draft DCO)**, particularly requirements 7, 8 and 12. The drafting of Article 44 has been updated to clarify the relationship between the powers in the article and the relevant management plans.
Part 3 (Streets) Article in relation to the Councils Permitting Scheme.	The Council would wish to see the dDCO include an article regarding the Application of the Council's Permitting Scheme. The Lincolnshire Permit Scheme applies to the whole of the Lincolnshire road network. Anyone who wants to carry out highways works in Lincolnshire must apply for a permit. This includes: • utility companies (telephone, gas, electricity, water) • the council itself • anyone working on a permitted	LCC would suggest wording similar to that in the Viking CCS DCO and the dDCO for Springwell Solar. (1) The permit scheme applies with the modifications set out in this article to street works carried out under the power conferred by article 8 (street works) of this Order. (2) For the purposes of this Order— (a) a permit may not be refused or granted subject to conditions which relate to the	

	development that affects the highway The Council are of the opinion that the scheme should apply to the DCO, as it does for statutory undertakers, which is the power sought by the applicant in the DCO.	imposition of moratoria; and (b) a permit may not be granted subject to conditions where compliance with those conditions would constitute a breach of this Order or where the undertaker would be unable to comply with those conditions pursuant to the powers conferred by this Order. (3) References to moratoria in paragraph (2) mean restrictions imposed under section 58A (restrictions on works following substantial street works) of the 1991 Act. (4) Without restricting the undertaker's recourse to any alternative appeal mechanism which may be available under the permit	**Article 45 (Procedure in relation to certain approvals, etc.):** The Applicant considers that the time period of 8 weeks specified in Article 46(4) (note in the latest draft of the DCO this is now Article 46) is appropriate and strikes the correct balance between giving the discharging authority sufficient time to consider the approval/consent/agreement whilst also not unduly delaying the delivery of critical national priority infrastructure. Furthermore, the undertaker and relevant consenting authority may (both acting reasonably) agree a longer period for the determination of any application. The drafting of Article 46 is precedented in numerous solar DCOs, most recently Article 46 of the **Tillbridge Solar Order 2025**. The Applicant sees no reason why it is not appropriate to follow this precedent. **Schedule 2 (Requirements) Requirements 5, 7, 12, 18 and 19:** In response to the Council's comments, the Applicant has updated the drafting of requirement 5 (detailed design approval), requirement 7 (landscape and ecological management plan), requirement 12 (construction environmental management plan) and requirement 19 (decommissioning and restoration) of the **Draft DCO (Document Ref: 3.1)**. It is noted that the previous version of the DCO (submitted at Procedural Deadline A) did not contain a requirement 19, so it is assumed that this is a typographical error. **Requirement 8 (Biodiversity Net Gain):**

		scheme or otherwise, the undertaker may appeal any decision to refuse to grant a permit or to grant a permit subject to conditions pursuant to the permit scheme in accordance with the mechanism set out in Schedule 16 (procedure for discharge of requirements) of this Order.	The Applicant does not consider the proposed drafting change to be necessary. Sub-paragraph (2) of the requirement states that the biodiversity net gain strategy prepared pursuant to the requirement "*must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates*." Paragraph 2.3.8 of the **Outline Landscape and Ecological Management Plan (APP-089) (OLEMP)** commits that the Applicant will 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, calculated using The Statutory Biodiversity Metric published by the Department for Environment, Food and Rural Affairs in July 2024. The requirement does not need to state these percentages again as the commitment is secured through the requirement that the biodiversity net gain strategy be "substantially in accordance" with the **OLEMP**.
Part 3 Streets Article 15 Temporary prohibition or restriction of use of streets and public rights of way	Section 15(1) (general powers to alter or temporarily close any street or public right of way) runs contrary to 15(3) (detailing specific rights of way mentioned in the schedules). This power is considered to be excessive and should reduce to those PROW identified in the DCO application. The section does contain a requirement to consult the street authority for any closures (15(4)). For the avoidance of doubt		**Requirement 16 (Soil Management):** The Applicant notes this request and notes that the Council has not provided reasons for why this change is considered necessary. The inclusion of Lincolnshire County Council as the discharging authority for this requirement follows the recent precedent of **The Gate Burton Energy Park Order 2024** and the **Tillbridge Solar Order 2025**. The Applicant has therefore not made any changes to the drafting of Schedule 2 in response to this statement but is open to discussing this with LCC and NKDC.

this should state the highway authority as well.

Section 15(6) allows the undertaker to use any street or PROW that has been closed as a temporary working site, with a requirement for it to be reinstated to its previous condition after such use ends. This should have a requirement somewhere for the condition to be noted in advance of works so that we have a record of exactly what condition that was, and also for any reinstatement to be completed to the satisfaction of the highway authority.

The section does not contain any timeframes notices periods or consultation requirements with the Council as the Highway authority. There is no requirement for consent

Requirement 18 (Decommissioning and Restoration):

The Applicant does not consider that any change to the drafting of this requirement is necessary. Please refer to the response to paragraph 18.1 above. The Applicant also notes for the avoidance of doubt that this is now requirement 19, not 18.

In addition, it is noted that the application contains a **Funding Statement (APP-043)** which complies with requirements for evidencing availability of funding where an application contains compulsory acquisition powers. There is no policy requirement to provide this sort of evidence of funding in respect of non-compulsory acquisition in matters.

The possibility of requiring a form of bond or alternative security mechanism to be put in place for decommissioning costs was considered during the Examination of The Mallard Pass Solar Farm Order 2024. The ExA's Recommendation Report states at paragraph 7.4.73 that "*Whilst there were suggestions by Interested Parties for provision to be made for a financial bond, consistent with the other made DCO's for solar projects we do not consider this to be necessary given the controls that would already be in place via Requirement 18 [Decommissioning and restoration] of the DCO*". As far as the Applicant is aware, no solar DCO has imposed such a requirement, including the recently granted **West Burton Solar Project Order 2025**, **Heckington Fen Solar Park Order 2025**, **East Yorkshire Solar Farm Order 2025** and **Tillbridge Solar Order 2025**. There is nothing about the

		to the highway authority and there is no maximum timeframe given in the DCO, which runs contrary to the normal procedures for closing public rights of way. LCC consider that this wording is too wide a power to be included, and should contain a requirement for consultation and agreement with the highway authority, advance notice periods (so we know whether it is an enforcement issue or that the undertaker is acting under their powers), maximum timeframes for any diversion (suggest 6 months to be in line with the Road Traffic Regulation Act system), and alternative route arrangements.

Proposed Development which would justify a different approach.

NPS EN-3 provides a clear policy framework for solar NSIPs, and paragraphs 2.10.65 to 2.10.69 deal with project lifetime and decommissioning. There is no reference within this policy to it being necessary for security to be put in place to cover the costs of decommissioning. Indeed, paragraph 2.10.68 notes that "Solar panels can be decommissioned relatively easily and cheaply". Such a requirement would not meet the policy test within NPS EN-1 paragraph 4.1.16 that requirements should only be imposed that are, inter alia, necessary and reasonable. No such requirement has therefore been included in the draft DCO nor would it be appropriate.

Schedule 2 Part 2, 23. Fees:

The Applicant has amended the fee structure and fee amounts in paragraph 24 in Schedule 2 to the **Draft DCO (Document Ref: 3.1)** to reflect the equivalent drafting in the latest version of the Springwell draft DCO. The Applicant also notes for the avoidance of doubt that this is now paragraph 24, not 23.

	Part 6 Miscellaneous and general Article 43 Felling or lopping trees or removal of hedgerows	This article provides a blanket approval to remove hedgerows and protected trees without the need to notify the relevant authority or provide replacement planting. This provision risks undermining the principles and calculation of BNG provision within the site and could result in the loss of valuable trees. The Council recommends that this article is amended to include better safeguards to protected trees.	
	Part 6 Miscellaneous and general Article 45 Procedure in relation to certain approvals etc	The proposed 8 week timeframe for the determination of any consent or, agreement or approvals is considered to be too short. 10 weeks, which would consistent with the timeframe for discharge of requirements, would be considered more appropriate.	

Schedule 2 (Requirements) Requirements 5, 7, 12, 18 and 19	The Council would wish to be a consultee on these requirements, as discharge of aspects of these requirements relate to or would potentially affect other requirements and approvals such as access and traffic management, waste management where the Council is the relevant authority and/or has a statutory duty.
Schedule 2 (Requirements) Requirement 8	LCC suggest that the requirement includes specific reference to the minimum percentage of habitat, hedgerow and watercourse unit gain to be provided as part of the development.

3. Applicant's Comments on North Kesteven District Council Local Impact Report (REP1-054)

Table 3.1 – Applicant's Comments on North Kesteven District Council Local Impact Report (REP1-054)

PARA NO.	LIR TEXT	APPLICANT'S RESPONSE
Legislative and Policy Context – National Policy Statements		
Section 6	Please refer to NKDC LIR Section 6 for full text.	The Applicant has no comments to make on this section.
National Planning Policy Framework, National Planning Policy Guidance and Written Ministerial Statements		
Section 7	Please refer to NKDC LIR Section 7 for full text.	The Applicant has no comments to make on this section.
Central Lincolnshire Local Plan		
Section 8	Please refer to NKDC LIR Section 8 for full text.	The Applicant has no comments to make on this section.
Neighbourhood Plans/ Other Local Policy/ Guidance/ Strategies		
Section 9	Please refer to NKDC LIR Section 9 for full text.	The Applicant has no comments to make on this section.
Alternatives and Design Evolution		
10.1	Chapter 3 of the Environmental Statement (ES) describes the consideration of alternatives and design evolution in relation to the proposed development. It considers four alternatives:	This comment has been reviewed and is noted.

	• No development scenario • Site Selection process • Design Evolution – site extents • Design Evolution – layout and technologies	
10.2	The Site Selection Report (Appendix 2 of the Planning Statement) describes the applicant's subsequent assessment of reasonable alternatives and flood risk sequential approach following the applicant's identification of large landholdings capable of entering into voluntary commercial agreements within timescales that would allow the connection date to be achieved. There was a particular focus on minimising the extent of Flood Zone 3 land and BMV land. The applicant sought continuous areas of unconstrained land of at least 300ha, excluding collections of non-continuous sites due to increased costs and legal processes that would be required and knock-in impact on scheme viability.	This comment has been reviewed and is noted. It is acknowledged that the Council do not identify issues with the methodology of the Appendix 2 Site Selection Report of the ES (APP-277).
10.3	The fixed point of connection to the grid was based on the Bicker Fen National Grid Substation. A connection agreement has been obtained with a connection period between June 2029 and October 2033. The site search area is based on a 10km radius of the Bicker Fen Substation. Sites were sought that were potential suitable in accordance with EN-3 criteria and capable of accommodating a development of 400MW generation capacity. Part of the original site known as 'Beacon Fen South' was removed once it became apparent that it would conflict with the proposed site for the Lincolnshire Reservoir and for other environmental reasons.	This comment has been reviewed and is noted. It is acknowledged that the Council and its consultees do not identify issues with the use of Bicker Fen National Grid Substation as the fixed point of connection to the grid or the use of a 10km radius around the Bicker Fen Substation to identify potential alternative sites.
10.4	A site selection process was also undertaken for the Cable Route Corridor and the Bespoke Access Road Corridor (described in ES Table 3.2 and 3.3). Three potential	This comment has been reviewed and is noted. It is acknowledged that the Council and its consultees have not identified issues with reasons for the discounting of alternative

	alternative sites (PAS) were examined during Stage 4 of the site selection process and discounted for a variety of reasons (as set out in Section 4.4 of the Site Selection Report and Annex D, E and F) including the Flood Risk Sequential Test (paragraphs 4.4.33 to 4.4.30 of the Site Selection Report). PAS1 is located in Flood Zones 2 and 3 and therefore is not considered to be of lower risk than the proposed site.	options for the proposed Cable Route Corridor and Bespoke Access Road Corridor.
10.5	PAS2 does not meet the minimum size criteria and is heavily constrained and therefore was not considered to comprise a viable alternative. PAS3 is located in Flood Zone 1 and meets the size criteria but is heavily constrained and therefore was not considered to comprise a viable alternative. For these reasons, the applicant concludes that there are not suitable, and reasonably available sites appropriate for the development in areas with a lower risk of flooding and that the site accordingly passes the Sequential Test for flood risk.	This comment has been reviewed and is noted. Is is acknowledged that the Council and its consultees do not identify issues with the reasons for the discounting of PAS1, PAS2 and PAS3.
10.6	This is discussed further under section 18 Water Resources and Flood Risk (ES Chapter 11).	This comment has been reviewed and is noted.
	EIA Methodology	
11.1	The ES is required to contain the information specified in regulation 14(2) and must meet the requirements of Regulation 14(3) and 14(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. It must also include any additional information specified in Schedule 4 - Information for Inclusion in Environmental Statements of the EIA Regulations at (Regulation 14(2)) which is relevant to the specific characteristics of the particular development or type of development and to the	This comment has been reviewed and is noted by the Applicant. It is acknowledged that the Council and its consultees do not identify any overarching areas where the submission documents do not accord with the regulations but that some matters in relation to assessment methodology in relation to the temporary / permanent loss of best and most versatile (BMV) agricultural land are highlighted.

	environmental features likely to be significantly affected. The Council and its consultees do not identify any overarching areas where the submission documents do not accord with these regulations, although we do highlight some matters in relation to assessment methodology in relation to the temporary/permanent loss of BMV agricultural land.	
11.2	The Council also notes that where the applicant has identified that flexibility is required in relation to design and layout considerations (in particular the general arrangement within the BESS/substation), guidance produced by the Planning Inspectorate with regard to the use of the 'Rochdale Envelope' has been applied within the relevant ES chapters to ensure a robust assessment of the likely significant (and worse case) environmental effects of the proposed development. We note that this involves assessing the maximum (and where relevant, minimum) parameters, size (footprint, width, and height) technology, and locations of the different elements of the proposed development for the elements where flexibility needs to be retained.	This comment has been reviewed and is noted by the Applicant. It is acknowledged that the Council highlights that, where the Applicant has identified that flexibility is required, guidance produced by the Planning Inspectorate with regards to the use of the 'Rochdale Envelope' has been applied to ensure a robust assessment of the likely significant (worse case) effects by assessing the maximum (or minimum where relevant) parameters, size, technology and locations of the different elements of the Proposed Development.
11.3	The Council also agrees that the applicant has applied relevant 'Zones of Influence' for each environmental topic area based on the extent of likely effects as identified as the study area in each of the individual topic chapters of this ES. In most cases these have been agreed with the Council and its consultees at pre-application stage and in feedback in relation to the Preliminary Environmental Impact Report (PEIR).	This comment has been reviewed and is noted by the Applicant. It is acknowledged that the Council agrees that the Applicant has applied the relevant Zones of Influence (ZoI) for each of the environmental topic chapters (i.e. **Chapters 6** to **16 (APP-057** to **APP 067)** of the Environmental Statement (ES) area based on the extent of likely effects as identified.
11.4	Finally, the Council has also discussed and agreed the 'Cumulative Sites Long List and Shortlist' (Chapter 4, Appendix 4.1 and 4.2 respectively) which presents the	This comment has been reviewed and is noted by the Applicant. It is acknowledged that the Council has discussed and agreed both the cumulative sites long list and short list

	identified long list of existing and/or approved developments within the search area and sets out the threshold criteria applied to identify the shortlist of existing and/or approved developments for each environmental topic.	(**Appendix 4.1 Cumulative Assessment Long List (APP-081)** and **Appendix 4.2 Cumulative Assessment Short List (APP-082)**).
12	**North Kesteven District Council Assessment of Impacts**	
12.1	The following sections identify the relevant policies within the development plan and other local policy, the key issues raised by the proposed development, the extent to which the applicant addresses them and thus the degree to which the Council considers the proposal to comply with local policy and the NPSs.	This comment has been reviewed and is noted by the Applicant. It is acknowledged. No further response is required.
13	**Landscape and Visual**	
13.1	EN-1 states that the Examining Authority (ExA) needs to consider the design of a scheme carefully. They should have regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	This comment has been reviewed and is noted by the Applicant. **Chapter 3 Alternatives and Design Evolution (APP-054)** of the Environmental Statement (ES) sets out the approach to siting of the Proposed Development and how the design has evolved in response to environmental and operational constraints. **Figure 1.4 Indicative Site Layout Plan (APP-195)** provides an overview of how the design of the Proposed Development has responded to specific environmental and operational constraints. **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** provides an illustration of specific landscape mitigation measures in relation to the Solar Array Area. Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** detail the mitigation measures proposed, which includes the production of **Appendix 6.7 Outline Landscape and Ecological**

		Management Plan (APP-089) (secured via Requirement 7 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**).
13.2	Paragraph 5.10.35 of EN-1 states that the ExA should 'judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'. Paragraph 5.10.36 then sets out that the ExA should 'consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable'.	This comment has been reviewed and is noted by the Applicant. **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports the predicted level of landscape and visual effects at construction, operation and decommissioning within the defined LVIA Study Area (detailed within Section 6.4 Assessment Methodology & Significance: Criteria Extent of the Study Area of Chapter 6). During construction, it has been found that temporary Significant visual effects will be experienced within the Solar Array Area, Cable Route Corridor and Bespoke Access Route up to a maximum distance of 500m from the order Limits. These effects would be short-term. The Proposed Development has been designed around the requirement to retain existing vegetation minimising the requirement for removal. During construction this vegetation will be retained and protected by measures set out in **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1)**). This retained vegetation will provide visual mitigation and landscape assimilation particularly because the existing hedgerows will be managed to a height of up to 3.5m during the Construction phase. Overall, it has reported within **Chapter 6 Landscape and Visual (APP-057) (LVIA)** that, following cessation of construction activity, the geographical influence and extent of visibility resulting from the Proposed Development will be limited and will not have a strong visual influence beyond the immediate context of the Site. Accordingly, at operation,

		following establishment of mitigation planting as illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and secured by **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1)**), a relatively restricted number of receptors will experience significant effects. This will include some residents in individual properties adjacent to the Site boundary and users of the PRoW and transport network as summarised in Table 6.8 of **Chapter 6 Landscape and Visual (APP-057)**.
13.3	Paragraph 5.10.5 of EN-1 sates that 'Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation'. Paragraph 5.10.6 then states that projects need to be designed carefully, taking account of the potential impact on the landscape, and that they should have regard to 'siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate'.	This comment is noted and the consideration of the Proposed Development with this policy is set out within the Planning Statement (APP-277).
13.4	The specific guidance relating to Solar Photovoltaic Generation in section 3.10 of EN-3 notes at paragraph 2.10.94 that 'Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure'. Paragraph 3.10.95 states that 'whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised'.	This comment is noted and the consideration of the Proposed Development with this policy is set out within the **Planning Statement (APP-277)**.

13.5	CLLP policy S14 'Renewable Energy' supports proposals for renewable energy schemes subject to the direct, indirect, individual and cumulative impacts of development on, amongst other things, landscape character and visual amenity being acceptable or capable of being made acceptable.	This comment is noted and the consideration of the Proposed Development with this policy is set out within the **Planning Statement (APP-277)**.
13.6	CLLP policy S53 'Design and Amenity' states all development must achieve high quality sustainable design which contributes positively to the local character and landscape. Development should, amongst other things, be based on a sound understanding of the context, integrating into the surrounding, relate well to the site, protect any important local views into, out of or through the site, reflect the identity of area and contribute to the sense of place and maintain landscape quality and minimise adverse visual impacts through high quality building and landscape design.	This comment is noted and the consideration of the Proposed Development with this policy is set out within the **Planning Statement (APP-277)**.
13.7	**Landscape Impact:** no part of Beacon Fen Energy Park or the land surrounding it falls within a designated landscape. There are also no registered parks and gardens close to Beacon Fen Energy Park.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees with this statement relating to designated landscapes and registered parks and gardens.
13.8	The site would be located within the Fenland Landscape Sub Area and is characterised by a low lying and relatively flat fenland landscape crossed with drainage dykes and ditches, dominated by arable land use and open, relatively un-developed, character.	This comment has been reviewed and is noted by the Applicant. Whilst the Applicant generally agrees with this summary of landscape character as it relates to the LVIA Study Area (detailed within Section 6.4 Assessment Methodology & Significance: Criteria Extent of the Study Area of **Chapter 6 Landscape and Visual (APP-057)**), there is a distinction between the north west of the Study Area containing the Solar Array Area and the Bespoke Access Corridor, which is gently undulating and has a greater extent of vegetation cover, and

		the south east containing the Cable Route Corridor, which is flatter and more open in general terms.
13.9	**Visual Impact**: people in the landscape surrounding Beacon Fen Energy Park who are likely to experience views of Beacon Fen Energy Park are: • Residents in settlements; • Property groups; • Individual properties • Recreational receptors using the recreational path network and facilities; and • Users of the transport network.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees with this summary of visual receptor groups with the potential to experience views of the Proposed Development.
13.10	Proposed 'embedded' mitigation includes a reduction in the extent of solar PV panels to provide buffers from nearby residential receptors and PROW, existing hedgerows and trees and drains. The solar arrays will be located within the existing field pattern with associated boundary hedgerows and tree cover retained as much as possible. Native shrub areas with trees will be introduced within the solar array area to provide visual mitigation in relation to specific residential properties and shrub and hedgerow planting will provide landscape and biodiversity enhancements.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees with this summary of embedded mitigation (as detailed within **Appendix 2.3 Embedded Mitigation (APP-076)** of the Environmental Statement (ES) and secured through the **Draft DCO (Document Ref: 3.1)**).
13.11	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 District Council. A copy of AAH's review of the applicant's LVIA is attached at Appendix A. AAH have carried out preapplication landscape and visual consultation with the applicant over a 12 month period.	This comment has been reviewed and is noted by the Applicant. The Applicant acknowledges the involvement of AAH Consultants in a shared arrangement between Lincolnshire County council (LCC) and North Kesteven District Council (NKDC).
13.12	The LVIA and associated figures, appendices and documents provide a generally comprehensive assessment of the proposed development, with an	This comment has been reviewed and is noted by the Applicant. The Applicant notes the comments relating to the appropriate level of detail provided by the LVIA (**Chapter 6**

	appropriate level of detail for a scheme of this scale and context. The assessment process is relatively well presented, with baseline conditions and predicted effects set out in a structured way. Significant effects on both landscape character and visual amenity are identified; however, there are several areas where further clarity or additional work is considered necessary.	**Landscape and Views (APP-057)**). The Applicant also notes that there is a request from the Council for further clarity or additional work required, and has invited North Kesteven District Council (NKDC) to further engagement in the form of an online meeting between Deadline 2 and 3 to discuss these additional information requirements.
13.13	AAH's specific comments on landscape impact and visual impact are set out as follows.	This comment has been reviewed and is noted by the Applicant.
13.14	**AAH comments on Landscape Impact:** the Future baseline is covered in paragraphs 6.5.66 to 6.5.68. The author judges that the landscape of the Site and Study Area will remain in its current state in the future. The development of solar farm projects and energy infrastructure (such as overhead lines and pylons, and associated sub stations and converter stations) in the region is not acknowledged to be a factor in the future baseline of the Study Area. This is a landscape undergoing extensive change to land-use, predominantly changing from agriculture to renewable and energy infrastructure development.	Within Section 6.5 Baseline Conditions of **Chapter 6 Landscape and Views (APP-057)**, paragraphs 6.5.66 to 6.5.68 relate to 'Future Baseline Conditions'. Paragraph 6.5.66 states that the land of the Site would remain in agricultural use (assuming the Proposed Development was not introduced). This is considered to be a reasonable assumption. Paragraph 6.5.67 acknowledges the potential for cumulative development with other renewable schemes. Paragraph 6.5.68 acknowledges the likely influence of climate change on species composition and habitat types. Therefore, it is not agreed that the future baseline section of the LVIA does not acknowledge the likelihood of landscape evolution.
13.15	AAH have concerns regarding effects on the national and regional landscape character areas. The mass and scale of these projects combined has the potential to lead to a change in landscape character over an extensive area across these published character assessments. The landscape character of the 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.	**Chapter 6 Landscape and Visual (APP-057)** and **Chapter 18 Cumulative Effects (APP-069)** of the Environmental Statement (ES) 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 (in accordance with the scope detailed within **Chapter 4 Scope and Methodology (APP-055)** and with **Appendix 4.2 Cumulative Assessment Short List (APP-082)**), it has been found that there will be no

		residual Significant inter-cumulative landscape or visual effects. At a national and county level, the introduction of further development within National Character Area (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.
13.16	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 others 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/DCO schemes as well as Town and Country Planning (TCPA) scale projects. These will all combine to change the character of the wider landscape.	This comment has been reviewed and is noted by the Applicant. The potential for landscape character change at the county level resulting from the widespread introduction of a considerable number of renewable energy schemes and associated infrastructure is acknowledged. However, assessing the cumulative impact of all these schemes at the county level is beyond the scope of the LVIA for the Proposed Development. The Applicant considers that this should be addressed through the production of a county level strategic landscape sensitivity assessment of key land use study for renewable energy and relating this to published landscape character assessments.
13.17	This baseline process, undertaken by the applicant, resulted in several landscape receptors being identified as likely to be affected by the development identified as "Sensitive Receptors". These are presented in Table 6.4 and include both landscape elements or features of the Site	The Applicant notes this comment relating to the use of terminology and the categorisation of landscape receptors within the LVIA (**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES)). The Applicant proposes that this could be considered further and clarified as part of the

	and Study Area (e.g. vegetation and hedgerows, land use, landscape pattern), as well as Landscape Character, which we have assumed are the published landscape character areas as identified in paragraphs 6.5.3 to 6.5.20 of the LVIA, providing an overview of published character assessments. AAH consider that this identification and list is confusing and used inconsistently in the subsequent assessment, which goes on to assess *Landscape Character – Site Level; and Effects on Landscape character – Local landscape character*.	ongoing engagement process. An online meeting between the Applicant, North Kesteven District Council (NKDC), Lincolnshire County Council (LCC) and AAH Consultants to discuss outstanding landscape matters is proposed between Deadline 2 and 3 of the examination timetable.
13.18	The way section 6.5.64 is written is that these are the receptors that the LVIA will assess the change to, however the actual receptors are the Site and wider character areas. Also confusingly, the construction effects on each of the landscape receptors are then broken down with subheadings into landscape elements and landscape character, but the 'Operational' effects are not broken down in the same way, mixing together these two aspects (character and elements). AAH consider that some clarity and re-structuring would assist in clarity of this section, specifically clearly laying out the landscape receptors identified, summarising the likely elements to be affected within these, assessing the list of landscape receptors breaking down into effects on elements and character.	The Applicant notes this comment relating to the use of terminology and the categorisation of landscape receptors within the LVIA (**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES)). The Applicant proposes that this could be considered further and clarified as part of the ongoing engagement process. An online meeting between the Applicant, North Kesteven District Council (NKDC), Lincolnshire County Council (LCC) and AAH Consultants to discuss outstanding landscape matters is proposed between Deadline 2 and 3 of the examination timetable.
13.19	For clarity, AAH have assumed the following are the landscape baseline receptors: • Site level; • Fenland Sub Area; • Central Clays and Gravels Sub Area; • Holland Reclaimed Fen LCA; • Bicker to Wyberton Settled Fen LCA; and • South Holland Fen LCA.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees that this description provides an accurate classification of the landscape receptors considered in the LVIA **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES)).

13.20	The Landscape Assessment is detailed within section 6.6 of the LVIA, referring to Appendix 6.3: Landscape Character Baseline and Sensitivity which includes a clear assessment of 'Value' only, and therefore would suggest Appendix 6.3 is erroneously titled as it does not contain an assessment of 'Susceptibility', or subsequently combine value and susceptibility for a judgement on 'Sensitivity'. Similarly, the statement in paragraph 6.6.7 that "the landscape assessment is based on the determination of relevant landscape sensitivity set out in Appendix 6.3: Landscape Character Baseline and Sensitivity (Document Ref: 6.3 ES Vol. 2, 6.3.15)" is not correct as Appendix 6.3 provides an overall character summary and Value Assessment only. Nowhere within the LVIA have AAH located a detailed assessment of landscape susceptibility, with only a summary (as stated in paragraph 6.6.7: "…summarised in the following section") provided for the 'susceptibility' and 'sensitivity' of the site and local landscape character areas. The applicant should clarify the process adopted.	This comment has been reviewed and is noted by the Applicant. Paragraphs 6.6.8 to 6.6.29 of the **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) provide an assessment of landscape sensitivity combining landscape value and susceptibility to determine sensitivity in accordance with the recommendations of the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3). Whilst it is acknowledged that **Appendix 6.3 Landscape Character Baseline and Sensitivity (APP-085)** does not provide an assessment of susceptibility, it is contained within the LVIA (Chapter 6). The Applicant will discuss the approach to resolve this matter during the proposed engagement with North Kesteven District Council, Lincolnshire County Council and their consultants AAH. An online meeting between the Applicant, North Kesteven District Council (NKDC), Lincolnshire County Council (LCC) and AAH Consultants to discuss outstanding landscape matters is proposed between Deadline 2 and 3 of the examination timetable.
13.21	In line with the methodology, the assessment of the landscape effects considers the change to the identified landscape receptors at construction, operation (both years 1 and 15) and decommissioning. This includes 'Landscape Character Effects' within the Order Limits (which would be direct) and 'Landscape Effects' within 'Published Landscape Character Areas' (which would be both direct and indirect). However, as identified above, only 'Landscape Elements' are considered at the construction stage, not at operation. This provides an inconsistent approach and AAH request the applicant provide clarity as one of the main landscape effects will be the change in land	**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) sets out the assessment of landscape effects. Operational phase effects in relation to landscape elements and character are described under the heading 'Landscape Character' within Chapter 6.

	use of the areas of above ground development from arable fields to a solar development.	
13.22	The LVIA identifies 'Significant' landscape effects at the phases of construction, operation (year 0), operation (year 15), and decommissioning phases. The following effects upon identified landscape receptors are identified in the LVIA: • At Construction the following receptors were assessed as having the following landscape effects: o Site level: Major adverse: Significant o Fenland Sub Area: Moderate adverse (significant) • At Operation (Year 0) the following receptors were assessed as having the following landscape effects: o Site level: Major adverse: Significant o Fenland Sub Area: Moderate adverse: Significant • At Operation (Year 15) the following receptors were assessed as having the following landscape effects: o Site level: Moderate adverse: Significant • At Decommissioning, effects would be similar to those at the construction phase, however, the Site and local landscape will benefit from established planting associated with the scheme.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees with the general summary of Significant landscape effects at the different development phases as set out in the Landscape Effects section of **Chapter 6 Landscape and Visual (APP-057)**, but it should be noted that significant effects at Operation (Year 0 and Year 15) in relation to the Site area will primarily be a result of the presence of the Solar Array Area. Following cessation of construction activity, the characterising influence of the Cable Route Corridor and the Bespoke Access Road will be less notable.
13.23	These 'Significant' effects represent direct effects on the landscape of the entirety of the site. At year 15, the Order Limits (the entirety of the site) has been assessed as having a 'Significant Residual effect' even when mitigation planting has established. The landscape character area of the Fenland Sub Area has been judged by the LVIA author as having 'Significant' effects at Construction and Operation Year 1 only, with landscape effects judged as reducing to	This comment has been reviewed and is noted by the Applicant. It should be noted that the Landscape Effects section (Paragraphs 6.6.55 to 6.6.60) of **Chapter 6 Landscape and Visual (APP-057)** reports significant effects at Operation (Year 0 and Year 15) in relation to the Site area which will primarily be a result of the presence of the Solar Array Area. Following cessation of construction activity, the characterising influence within the Cable Route Corridor will minimal following establishment of reinstatement planting. The

	'Minor Adverse' through the establishment of mitigation planting.	long term presence of infrastructure within the Bespoke Access Corridor will be locally significant at a Site level but its characterising presence would not be perceived more widely.. The Applicant agrees with the summary of effects relating to the Fenland Sub Area.
13.24	While AAH acknowledge the establishing planting as part of the mitigation proposals will add a positive element to this landscape, they consider that the urbanising element of large scale solar on open, agricultural land is a definite and adverse change to the baseline of the Fenland Sub Area. New planting will offset some of the adverse elements of the scheme, however AAH disagree with the applicants' findings that the residual effects on the Fenland Sub Area would subsequently reduce to 'Minor Adverse'; instead AAH judge it would remain as 'Moderate adverse' and therefore 'Significant' (negative).	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 within the Landscape Effects section of **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES)**,** 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 minor adverse (Not Significant) at Operation year 0 following cessation of construction activity. Therefore, the Applicant does not agree that there will continue to be Significant effects on the Fenland Sub Area following establishment of mitigation planting on the basis that the characterising influence of the Proposed Development will be experienced over a limited geographical extent and relatively small proportion of the landscape character area.
13.25	Even with mitigation planting in place, the scheme is still a direct, large scale land use change across all fields in which above ground infrastructure is proposed. This would be an addition of new elements that will replace a key characteristic of this landscape, influencing overall character, and being a major addition, albeit affecting a relatively localised area of the LCA. As acknowledged in	The Applicant agrees that the overall character of the Site itself will be fundamentally affected. Although the landscape is relatively open, the presence of linear vegetation belts and woodland blocks is also characteristic, particularly in relation to the Solar Array Area and the Bespoke Access Road. Views are consistently defined by the presence of this vegetation on the skyline and within intervening layers of vegetation cover.

	paragraph 6.6.63 "The openness of the fenland landscape will be altered with some modifications to the field pattern and greater presence of planting introduced to accommodate the Proposed Development". AAH also have concerns in regards to the mitigation planting itself causing adverse effects by being out of character with this open fenland, e.g. through the introduction of 3.5m high hedgerows.	Some of the road network is open, but much of the local road network in the area adjacent to the Solar Array Area and the Bespoke Access Road is defined by hedgerows that provide visual enclosure. It is acknowledged that the local road network in proximity to the Cable Route Corridor is less enclosed and more open. This context has informed the development of the landscape proposals illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235).** The approach to the landscape scheme has been to strengthen existing boundary features, link existing areas of plantation and scrub and strategically introduce mitigation planting for specific receptors rather than to introduce large scale woodland blocks which would be overly dominant. In this context, it is not considered that hedgerows at 3.5m would be 'out of character 'and this management prescription will aid assimilation and visual mitigation.
13.26	The proposed localised removal of vegetation is identified in the assessment of landscape effects; however, it is unclear whether this includes vegetation works on the wider highways network, and what this would entail. AAH strongly recommend limiting vegetation loss along the site boundaries for access or sight lines, or along construction access routes, because this has the potential to change the character of the local landscape beyond the limits of the development.	The extent of vegetation removal is illustrated in Figure **6.32 Vegetation Removal Plan (APP-236, APP-037 and REP1-015)** (which has been updated (to show the retention of vegetation at the South Forty Foot Drain) and resubmitted at Deadline 1). Vegetation removal in relation to the Solar Array Area is more precisely defined because of the relatively fixed development layout for this element. Vegetation removal in relation to the Cable Route Corridor and the Bespoke Access Corridor is indicated as 'vegetation to be potentially removed' to provide design flexibility for these linear elements. Details of the assumptions regarding the maximum extent of vegetation removal in these corridors is provided in **Appendix 6.7 Outline Landscape and Ecological Management Plan**

		(APP-089) (secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1)**).
13.27	**AAH comments on Visual Impact:** The Visual Assessment is provided within section 6.6 of the LVIA and detailed within Appendix 6.4: Visual Assessment. As outlined above, AAH have not located an assessment of value or susceptibility relating to visual receptors, with only a final judgement of 'Sensitivity' of visual receptor provided within Appendix 6.4 with no explanation as to how this judgement has been arrived at. 13.28 The LVIA chapter does not provide any narrative in regard to the assessment to the value of views experienced by receptors or the susceptibility of receptors to changes in their view. While an assessment of sensitivity is provided within Appendix 6.4 of the baseline panoramas (viewpoints), none is provided for the receptors themselves. This does not fully align with guidance provided within the Landscape Institute's Technical Guidance Note LITGN-2024-01 'Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3)'.	**Appendix 6.4 Visual Assessment (APP-086)** of the Environmental Statement (ES) provides a description of receptor value and susceptibility to determine receptor sensitivity in accordance with the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and in accordance with The Landscape Institute Technical Guidance Note LITGN-2024-01. These sensitivity levels have been used to inform **Chapter 6 Landscape and Visual (APP-057)** for the different receptor groups considered in the LVIA. Receptor sensitivity levels for receptor groups is in accordance with the recommendations in GLVIA3, which are 'high' for residents and Public Rights of Way (PRoW) users and 'medium' for users of the road network.
13.28	The LVIA chapter does not provide any narrative in regard to the assessment to the value of views experienced by receptors or the susceptibility of receptors to changes in their view. While an assessment of sensitivity is provided within Appendix 6.4 of the baseline panoramas (viewpoints), none is provided for the receptors themselves. This does not fully align with guidance provided within the Landscape Institute's Technical Guidance Note LITGN-2024-01 'Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3)'.	**Appendix 6.4 Visual Assessment (APP-086)** of the Environmental Statement (ES) provides a description of receptor value and susceptibility to determine receptor sensitivity in accordance with the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and in accordance with The Landscape Institute Technical Guidance Note LITGN-2024-01. These sensitivity levels have been used to inform **Chapter 6 Landscape and Visual (APP-057)** for the different receptor groups considered in the LVIA. Receptor sensitivity levels for receptor groups is in accordance with the recommendations in

		GLVIA3, which are 'high' for residents and Public Rights of Way (PRoW) users and 'medium' for users of the road network.
13.29	AAH have also raised concerns about other aspect of the Visual Baseline as set out in paragraphs 5.1 to 5.10 and 5.12 of their comments (Appendix A).	The Applicant has reviewed the matters raised in paragraphs 5.1 to 5.10 and 5.12 of Appendix A of the North Kesteven District Council (NKDC) LIR and has set out their response as follows: 5.1 – This comment is noted by the Applicant. 5.2 – This comment is noted by the Applicant. 5.3 –The Visual Baseline section (Paragraphs 6.5.3 – 6.5.58) of **Appendix 6.4 Visual Assessment (APP-086)** provides a description of the visual baseline and includes narrative relating to the visual characteristics of the LVIA Study Area. 5.4 – This comment is noted by the Applicant. It is acknowledged that some residential receptors are in close proximity to the Order Limits and some do have relatively open views, but views from some properties are partially restricted by intervening vegetation within gardens, to highway boundaries or within the wider landscape. 5.5 – This comment is noted by the Applicant. 5.6 – This comment is noted by the Applicant. 5.7 and 5.8 – **Appendix 6.4 Visual Assessment (APP-086)** identifies and provides the assessment of visual effects for individual residential receptors and property groups. **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) provides an overview of key findings in relation to the assessment of effects for residential receptors

		which is informed by the findings of the Visual Assessment. The LVIA is focussed on the identification of effects from publicly accessible location in accordance with good practice the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3). **Appendix 6.5 Residential Visual Amenity Assessment (APP-087)** uses the findings of the visual assessment as part of the process to determine if the RVAA threshold is met in accordance with the 4-stage process advocated in Technical Guidance Note 2/19 (Landscape Institute, March 2019). 5.9 – This comment is noted by the Applicant. 5.10 –The parameters for the visualisations provided in **Figures 6.27 to 6.30 (APP-229 to APP-232)** have been derived from **Chapter 2 Proposed Development (APP-053)** and included within the Development Description section of the **Chapter 6 Landscape and Visual (APP-057) (LVIA).** It is acknowledged that these parameters are not stated on the photomontage figures or explicitly in relation to the photomontage methodology within the LVIA. The Applicant will add the parameters to the photomontage figures or add this to the photomontage methodology subject to agreement with North Kesteven District Council (NKDC). Following agreement on the requirements the Applicant will submit updated Figures at deadline 3. 5.12 - This comment is noted by the Applicant. The Applicant can update **Appendix 6.4 Visual Assessment (APP-086)** to provide specific references subject to agreement with NKDC.
13.30	Regarding the significant visual effects at Construction phase, these are typically identified for receptors on the	This comment has been reviewed and is noted by the Applicant.

	road and PROW network, along with multiple residents in the local area, that are in close proximity to the Development with limited or absent screening allowing for clear views.	
13.31	The significant visual effects at Construction phase are listed in a concise form in paragraph 5.15 of AAH's comments (Appendix A) and below. At construction: (Refer to NKDC LIR Section 13.31 (pages 29 to 31) for listed major adverse (significant) visual effects and moderate adverse (significant) visual effects receptors)	This comment has been reviewed and is noted by the Applicant. The Applicant notes the provision of this summary which relates to Construction phase significant visual effects.
13.32	These 'Moderate' and 'Major Adverse' (negative) effects are considered to be 'Significant' and would result from the proposed construction activity seen at close range across a wide extent of a view. While these receptors are relatively localised, with limited long-range views of the construction activity, AAH disagree with the LVIA that they are low in number, as the list within AAH's full comments (paragraph 5.15 and above) clearly identifies. The construction phase will affect a high number of visual receptors across a wide area.	It is acknowledged within **Chapter 6 Landscape and Visual (APP-057) (LVIA)** and **Appendix 6.4 Visual Assessment (APP-086)** that the visual influence of the Proposed Development will affect a number of visual receptors during the construction phase. The number of significantly affected receptors will reduce following cessation of construction activity and will be further reduced following establishment of mitigation planting. At this point the number of visual receptors experiencing significant visual effects will be limited. Table 6.8 Landscape and Visual Summary Assessment Matrix of the LVIA provides a summary of Significant Landscape and Visual effects at different phases of the Proposed Development.
13.33	The significant visual effects at Operation (Year 1) are listed in a concise form in paragraph 5.15 of AAH's comments (Appendix A) and below. At operation: (Refer to NKDC LIR Section 13.33 (pages 31 and 32) for listed major adverse (significant) visual effects and moderate adverse (significant) visual effects receptors)	This comment has been reviewed and is noted by the Applicant. The Applicant notes this reference.

13.34	These represent a large reduction in receptors experiencing 'Significant' effects and also several receptors have reduced in the level of Significance from 'Major' to 'Moderate' adverse (but which remain 'Significant'). AAH would expect this level of reduction, which is predominantly from the Cable Corridor and Bespoke Access Road having construction effects, but limited adverse effects once completed being either below ground (cable), or through a change in the ground surface (road), which would have limited wider visibility.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees with this summary of the reduction in the number of significant visual effects following establishment of mitigation planting.
13.35	While there are still several receptors identified as experiencing 'Significant' adverse visual effects from the development, AAH query as to how views that are temporary in nature (at construction) to those of a long term/permanent change are able to reduce, especially as at this stage, any mitigation planting is yet to establish and is subsequently providing limited screening or integration of the development. This needs to be clarified.	Within **Chapter 6 Landscape and Visual (APP-057)**, a greater number and range of significant visual effects has been identified at the construction phase because these receptors will experience relatively close distance views of construction activity within the Solar Array Area, the Cable Route Corridor and the Bespoke Access Corridor. Following cessation of the construction phase, the Cable Route Corridor and the Bespoke Access Corridor will retain to a more settled state, albeit hedgerow loss will be initially apparent. Therefore, significant visual effects within the Cable Route Corridor will no longer be experienced. A limited number of Public Right of Way (PRoW) users with close range views of the Bespoke Access Road will continue to experience significant visual effects.
13.36	The significant visual effects at Operation (Year 15) are listed in a concise form in paragraph 5.15 of AAH's comments (Appendix A) and below: At operation:	This comment has been reviewed and is noted by the Applicant..

	(Refer to NKDC LIR Section 13.36 (page 32) for listed major adverse (significant) visual effects and moderate adverse (significant) visual effects receptors)	
13.37	These represent a further reduction in receptors experiencing 'Significant' effects through the establishment of mitigation planting over 15 years from planting. The LVIA therefore identifies that several visual receptors will experience 'Significant' adverse effects over the remaining 30 years (45 years in total) of the development.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees that the establishment of mitigation planting will result in a reduction in the number of receptors experiencing Significant effects. It is also agreed that some receptors will experience Significant effects for the duration of the Proposed Development.
13.38	At decommissioning, effects would be similar to those at the construction phase, however the site and local landscape will benefit from established planting associated with the scheme, which would provide screening and integration in views.	This comment has been reviewed and is noted by the Applicant. The Applicant agrees with the statement that decommissioning effects would result from similar levels of activity as the construction phase but that the establishment of mitigation planting (detailed within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)**and illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will provide increased screening.
13.39	AAH have noted several errors in transcribing 'Significance' of effect from Appendix 6.4 Visual Assessment into the main LVIA text, for example where some effects that are judged as 'Major' in Appendix 6.4 have been described as 'Moderate' in the main narrative, or have not been identified at all. The Council requests this is further reviewed and the main LVIA chapter accurately reflects the assessment carried out in Appendix 6.4 as often 'Significant' effects are underplayed or not identified, leading to a misinterpretation of potential visual effects.	The Applicant has invited Lincolnshire County Council, North Kesteven District Council and the consultants AAH to take part in further engagement. This engagement will provide the opportunity to discuss perceived errors in the LVIA (**Chapter 6 Landscape and Visual (APP-057)**). An online meeting between the Applicant, NKDC, LCC and AAH Consultants to discuss outstanding landscape matters is proposed between Deadline 2 and 3 of the examination timetable. It is the Applicant's to submit an updated **Statement of Common Ground with NKDC (REP1-018)** and an updated **Statement of Common Ground with LCC (REP1-016)** at

		Deadline 3 of the examination which will address the perceived errors in the LVIA (**Chapter 6 Landscape and Visual (APP-057)**).
13.40	One example is for Residential receptors at Gashes Barn (receptor R4); the LVIA chapter and subsequent summary Table 6.8 judges this to have a 'Moderate Adverse' Year 15 residual effect, whereas Table 1.21 of Appendix 6.4 judges year 15 residual effects at 'Major Adverse'. Subsequently, the RVAA judges Gashes Barn (R4) in Table 1.1 as a 'Moderate Adverse' Year 15 residual effects. The Council requests that the judgements are reviewed thoroughly and a tracked change LVIA is provided to fully assess the findings of the visual assessment and comment upon individual judgements.	The Applicant has invited Lincolnshire County Council, North Kesteven District Council and the consultants AAH to take part in further engagement. This engagement will provide the opportunity to discuss perceived errors in the LVIA (**Chapter 6 Landscape and Visual (APP-057)**). An online meeting between the Applicant, NKDC, LCC and AAH Consultants to discuss outstanding landscape matters is proposed between Deadline 2 and 3 of the examination timetable. It is the Applicant's to submit an updated **Statement of Common Ground with NKDC (REP1-018)** and an updated **Statement of Common Ground with LCC (REP1-016)** at Deadline 3 of the examination which will address the perceived errors in the LVIA (**Chapter 6 Landscape and Visual (APP-057)**).
13.41	However, notwithstanding this, the development has been identified in the LVIA as resulting in a significant change to a variety of visual receptors during construction and in the early years of operation and maintenance, with significant residual visual effects much reduced in number, which suggests a potential over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape. AAH's concern is that mitigation planting must be well considered at any detailed design stage, and not simply put in place to screen views of development at the cost of the existing view.	It is agreed that that the LVIA (**Chapter 6 Landscape and Visual (APP-057)**) has found that there are a reduced number of residual significant effects in relation to those identified for earlier phases of the Proposed Development. It is not agreed that there is an over reliance on mitigation planting. Rather, the reduction in the number of residual significant effects is based on reasonable assumptions regarding the establishment and growth rate of mitigation planting. The landscape proposals illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** have been designed to provide visual mitigation for specific receptors and to provide landscape assimilation more generally whilst maintaining perceptions of openness which is a defining characteristic of

		the Fenland landscape. To achieve this balance, the approach has been to introduce linear planting belts native shrubs with trees and species rich hedgerows, rather than larger woodland blocks, to provide linkages between existing areas of vegetation and visual mitigation. 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)** (secured via Requirement 7 of the **Draft DCO (Document Ref: 3.1))**. 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 construction phase to contribute to visual screening of the works.
13.42	These residual 'Significant' effects have been identified as arising from sensitive users on the road and PROW network, along with residents that are in close proximity to the development. The identified reduction in several 'Significant' visual effects relies upon the successful establishment of the mitigation planting scheme and a robust Outline Landscape and Ecological Management Plan (OLEMP) that is carried out for a suitable period of time.	All proposed planting will be implemented and managed in accordance with **Appendix 6.7 - Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (secured via Requirement 7 of **the Draft DCO (Document Ref: 3.1)**). The oLEMP also sets out the requirement to provide (a) detailed LEMP(s) which provides the opportunity to further refine the approach to the implementation and establishment of mitigation planting. As stated within Schedule 2 7(1) of the **Draft DCO**, "*No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the*

		relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities".
13.43	Subsequently, AAH disagree with several reductions in level of significance of effect at year 15 through the establishment of mitigation planting. The assumption made for several receptors is that by screening views of the scheme with planting, the level magnitude of effect will also reduce. In several instances the view from receptors will be completely altered from that of the existing, baseline view, predominantly from blocking or foreshortening expansive views across an open rural landscape. These are predominantly from residential properties in close proximity to the Solar Arrays, for example: • R1 Group Receptor: Ewerby Thorpe Farm and Ewerby Lodge; • R2 Group Receptor: Howell Fen Farmhouse, Asgarby Barns, Westmorelands Farm (potential views of Solar Array Area and Cable Route Corridor); • R3 Group Receptor: Copperhill Kennels Cattery, Waithe Farmhouse, The Grange, Ferry Farm and Mere House; • R4 Gashes Barn; • R20 Group Receptor: (Howell) including Crown Cottage and Keepers Cottage.	The Applicant agrees that screening views of energy infrastructure with planting can contribute to a reduction in the level of effect. It is also recognised that introduction of mitigation planting (detailed within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)** and illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) can and will change the characteristics of views and this has been a consideration in the assessment of visual effects. It is also acknowledged that the character of views for the specific properties mentioned will be changed and that in all examples there will be some loss of openness as perceived from some parts of the property. To a greater or lesser extent, views towards the Solar Array Area from all of these properties are partially influenced by the existing presence of vegetation cover within the external areas of the properties or within the wider landscape. The proposed mitigation planting will become assimilated into this wider pattern of vegetation cover. It is acknowledged that some views will be foreshortened by established mitigation planting, but it is not considered that the visual experience for residents will become excessively enclosed.
13.44	The outlook from residents in these properties will be altered and foreshortened, which is clearly illustrated on the Appendix 6.5 – Residential Visual Amenity Assessment Figure 1a,b,c - Howell Fen Farmhouse; Figure 2a,b,c - Keepers Cottage; and Figure 3a,b,c Crown Cottage.	The Applicant acknowledges that the visual experience for some residential receptors will be changed but that the introduction of strategically placed mitigation planting (detailed within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)**

		and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)** and illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will aid assimilation of the Proposed Development. This change will not be experienced from all aspects of the properties. In relation to Crown Cottage, change will be predominantly experienced from first floor windows in the eastern elevation of the property, existing mature vegetation within the property and to the highway boundaries will largely preclude visibility in ground level views. Views from Keepers Cottage will be experienced from some ground floor windows and external areas. However, these views are already strongly influenced by the presence of existing mature trees and hedgerows, and mitigation planting will be perceived in relation to this existing vegetation.
13.45	AAH judge that the year 15 effect on all these nearby residential receptors will be at least 'Moderate' and 'Significant'. The solar panels are proposed to be located very close to these receptors and the mitigation planting itself, designed to screen panels, is changing the view detrimentally; completely changing the character and openness of the view, and in AAH's opinion appearing out of character in this location. Even with a larger offset of development, or an increased landscape buffer, the open views would predominantly be foreshortened and changed compared with the existing. The year 15 assessment must be compiled based on changes to the baseline, not on how successfully the development is being screened from view.	It is not agreed that these receptors will continue to experience significant residual effects following establishment of mitigation planting (detailed within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)** and illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**). In all cases, solar development will be offset a minimum of 100m from the properties. In most cases, views will not be available from all aspects of properties. It is agreed that the assessment of residual effects should be based on change in relation to the baseline scenario and the Applicant can confirm that this is the approach adopted for the

		assessment of views from these properties. In this respect baseline views are not entirely open or devoid of vegetation cover and in some cases mature tree cover and established hedgerows are a notable element in baseline views. Therefore, it is considered that the proposed planting can be introduced into views without appearing as being an uncharacteristic element and which can provide reasonable assimilation with this existing planting associated with individual properties or within the wider landscape. The visualisations within **Appendix 6.5 Residential Visual Amenity Assessment (APP-087)** demonstrate that views of the Proposed Development can be mitigated, although it is recognised that there will be some loss of openness in relation to some specific views.
13.46	**Residential Visual Amenity:** Residential Visual Amenity has been considered as part of the LVIA. Views from Residential Receptors and Settlements are also considered within the LVIA, however no reference is made within the LVIA to Appendix 6.5, although Figure 6.7 Residential Properties illustrates the location of residential properties and settlements. From this it is unclear as to how the Residential Visual Amenity Assessment (RVAA) and LVIA have been coordinated, relying on the reader cross referencing findings. It would be useful for the LVIA to provide a clear statement in this regard, and also how the RVAA has informed the LVIA assessment of Views from Residential Receptors and Settlements as well as the overall site layout and mitigation.	**Appendix 6.4 Visual Assessment (APP-086)** identifies and provides the assessment of visual effects for individual residential receptors and property groups. **Chapter 6 Landscape and Visual (APP-057)** if the Environmental Statement (ES) provides an overview of key findings in relation to the assessment of effects for residential receptors which is informed by the findings of the Visual Assessment. The LVIA is focussed on the identification of effects from publicly accessible location in accordance with good practice (i.e. the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3)). **Appendix 6.5 Residential Visual Amenity Assessment (RVAA) (APP-087)** uses the findings of the visual assessment as part of the process to determine if the RVAA threshold is met in accordance with the 4-stage process advocated in

		Technical Guidance Note 2/19 (Landscape Institute, March 2019).
13.47	RVAA methodology is included within Section 1.18 of the LVIA methodology within Appendix 6.2. The methodology is considered to be sound and reflects Landscape Institute guidance 'TGN 2/19: Residential Visual Amenity Assessment', however the main LVIA does not state that it has considered this process explicitly, whether the Residential Visual Amenity Threshold (RVAT) has been met by any of the assessed properties. The detailed visual assessment within Appendix 6.4, at Table 1.20, references Appendix 6.5 only once for residents at Ewerby Thorpe Hamlet, however is not mentioned or referenced again for the remainder of the properties, the majority of which appear in both the RVAA and LVIA chapter.	The Applicant acknowledges that the Residential Visual Amenity Assessment (RVAA) methodology is considered to be appropriate and in accordance with Landscape Institute Guidance. In accordance with good practice, **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) focussed on views from publicly accessible locations and has been informed by **Appendix 6.4 Visual Assessment (APP-086)**. **Appendix 6.5 Residential Visual Amenity Assessment (APP-087)** is a separate but related process to the LVIA, focusing on the visual amenity of individual residential receptors as experienced from within the curtilage of properties rather from publicly accessible locations. The RVAA has found that the RVAA threshold for residents within a single property, Gashes Barn, would be met for a period of up to approximately 10 years until mitigation planting is established.
13.48	RVAA is a stage beyond Landscape and Visual Impact Assessment and focuses exclusively on private views and private visual amenity, whereas the LVIA process is typically associated with public views from public areas. The Landscape Institute's Technical Guidance Note 2/19: 'Residential Visual Amenity Assessment' provides further detail and that that the RVAT is reached when the change to visual amenity of residents in individual properties identified as "having the greatest magnitude of change".	This statement has been reviewed and noted by the Applicant. The Applicant agrees with this statement summarising the roles of Residential Visual Amenity Assessment (RVAA) and Landscape and Visual Amenity Assessment (LVIA), respectively.
13.49	The RVAA has utilised a study area of 250m which is reasonable, with TGN 2/19 not being explicit in defining a study area for RVAA. The baseline identified sixteen groups of properties within the 250m study area, which are listed	This statement has been reviewed and noted by the Applicant. The Applicant acknowledges that the 250m Residential Visual Amenity Assessment (RVAA) study area is considered to be reasonable. The Applicant agrees with the summary of

	in Table 1.1. Of these, properties where operational phase 'significant' effects have been predicted are as follows • R1 Group Receptor: Eweby Thorpe Farm; and Ewerby Lodge • R2 Group Receptor; Howell Fen Farmhouse; Asgarby Barns; and Westmorelands Farm • R4 Gashes Barn • R20 Group Receptor; Crown Cottage; and Keepers Cottage	properties where significant operational phase effects will be experienced.
13.50	On this scheme, due to the scale and extents, as well as height of some elements (e.g. substations) we would anticipate that some residents will experience 'Significant' adverse visual effects from several properties, as laid out in the RVAA. Of particular concern is R4 Gashes Barn which is judged to reach the Residential Amenity Threshold due to the proximity of works and the scheme design and layout, which will surround this property.	This statement has been reviewed and noted by the Applicant. The Applicant agrees with this statement regarding significant effects for some residential properties.
13.51	Gashes Barn is an isolated property located within an agricultural landscape, and as set out in the planning history referred to in section 5 it was converted to a residential dwelling by virtue of a 2004 planning permission. It currently has predominantly open boundaries. Gashes Barn would be entirely surrounded by solar arrays at a distance of 150m to the north, 165m to the east, 205m to the south and 185m to the west. The proposed substation and BESS would be approximately 1,030m to the south west. There would be views of the solar arrays from all aspects of the property and its associated access road. The RVAA concludes that this is likely to be perceived as 'overwhelming' but not 'overbearing' in the medium term until Year 10.	This statement has been reviewed and noted by the Applicant. The Applicant agrees with this statement summarising the Residential Visual Amenity Assessment (RVAA) implications for Gashes Barn.

13.52	While it is judged that the degree of effect would reduce with the establishment of planting, this is very much dependent upon the successful implementation of a robust management regime to ensure establishment, and even with established planting the property would remain surrounded by the development, completely changing the current open rural outlook and context for residents, and remains a significant concern. Again, established mitigation planting will aid in screening the development, however the open views will be foreshortened drastically.	The landscape mitigation proposals (secured through the **Draft DCO (Document Ref: 3.1)**) for Gashes Barn are illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and have been developed to achieve a balance between screening views of energy infrastructure whilst maintaining some perceptions of openness. Proposals to the principal northern aspect of the property have been developed in association with the project Heritage Consultant who has stressed the need to maintain some openness, particularly for in relation to views to the north. To achieve this, a species rich native hedgerow is proposed beyond the extent of the property curtilage to the north. The intention is to screen views of solar panels whilst maintaining views of the wider landscape beyond which is framed by mature vegetation to the northern Site boundary and on the skyline. It is acknowledged that this will result in some loss of openness and a change to the visual character of the view. To the south, west and east a linear belt of native shrubs with trees is proposed which will provide more comprehensive screening from these aspects.
13.53	However, we agree with the RVAA that while the remaining properties as assessed will experience 'Significant' effects, it is unlikely that these will reach the RVAT through as a result of the development.	This statement has been reviewed and noted by the Applicant. The Applicant acknowledges the agreement that properties, other than Gashes Barn, considered within **Appendix 6.5 Residential Visual Amenity Assessment (APP-087)** will not meet the Residential Visual Amenity Threshold.
13.54	The 'Embedded Mitigation' section of the LVIA (paragraph 6.3.15 onwards) also goes on to explain how the site layout and mitigation has responded to properties, stating "Reduction in the extent of the proposed solar PV panels to provide buffers from nearby residential receptors", which is	The extent of the buffers from specific residential properties in proximity to the Solar Array Area have been developed to provide an appropriate offset to help reduce visual prominence of energy infrastructure. They have been developed in an iterative manner using the early identification of potential

	also stated in Appendix 2.3 'Embedded Mitigation', however it is not explicit as to how adverse effects from properties have been fully considered as part of an iterative process. Offsets and buffers are mentioned throughout the submission, however these predominantly refer to ecological or drainage constraints, or consideration of noise. Section 5.3.2 of the 'Design and Access Approach Document' mentions discussions with the occupiers of Gashes Barn and discussions of buffers.	visual effects and professional judgement from landscape professional regarding the extent of the offset and how this offset in association with mitigation planting could mitigate potentially significant effects. Where possible the buffers are also logically defined by existing field boundaries and existing linear features to minimise disruption to field pattern. **Figure 1.4 Indicative Site Layout Plan (APP-195)** illustrates how the Proposed Development has responded to specific constraints.
13.55	We have been unable to locate as to what these buffers are, and how they have been established - both in the case of R4 Gashes Barn, but also other properties in close proximity (R1, R2, and R20). Offsets and buffers from sensitive receptors on the whole look minimal, and further clarification on the depth and extent of these and how they have been considered as part of an iterative process would be beneficial. As previously stated in this review, we have concerns regarding the proximity of the development to these properties, and also that the scheme will completely change the baseline views, with panels and subsequently established planting (at year 15) foreshortening views and blocking open and expansive views across this landscape. This is demonstrated on Figure 1a,b,c - Howell Fen Farmhouse; Figure 2a,b,c - Keepers Cottage; and Figure 3a,b,c – Crown Cottage within Appendix 6.5.	The extent of the buffers from specific residential properties in proximity to the Solar Array Area have been developed to provide an appropriate offset to help reduce visual prominence of energy infrastructure. They have been developed in an iterative manner using the early identification of potential visual effects and professional judgement from landscape professional regarding the extent of the offset and how this offset in association with mitigation planting could mitigate likely significant effects. Where reasonably possible, the buffers are also logically defined by existing field boundaries and existing linear features to minimise disruption to field pattern. Gashes Barn is situated in a relatively large land parcel and the approach has been to strengthen existing boundaries through the introduction of mitigation planting to these existing features rather than to fragment existing field pattern by introducing further linear features. In relation to the other properties specified it is not agreed that baseline views will be 'completely' changed on the basis that mature vegetation is present in baseline views and mitigation planting will have a visual association with this existing vegetation. Although it is recognised that the visual composition of views will change as

		a result of the planting. **Figure 1.4 Indicative Site Layout Plan (APP-195)** illustrates how the Proposed Development has responded to specific constraints.
13.56	The success of the landscape mitigation to meet the objectives laid out in the management plan - to integrate and screen proposals, promote conservation and protection of the environment, and encourage ecological and habitat diversity - is highly dependent upon the successful management and maintenance of the new planting, as well as the protection of exiting trees and hedgerows. The maintenance operations provide an initial overview of operations; however, we would expect the management plan to be developed further, well beyond the initial 5-year period, particularly if landscape and visual effects are being assessed at 15 years.	All proposed planting (detailed in Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)** and illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will be implemented and managed in accordance with **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (secured by Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**). The oLEMP sets out the requirement to provide a detailed LEMP which provides the opportunity to further refine the approach to the implementation and establishment of mitigation planting. As stated within Requirement 7(1) of the Schedule 2 of the **Draft DCO**, "*No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*". The oLEMP sets out the outline approach for the initial 5-year establishment maintenance period as well as longer term objectives and monitoring requirements.
13.57	The long-term reduction in landscape and visual effects, presented in the LVIA, are based on the long-term success of the landscape mitigation, and therefore the management	All proposed planting (detailed in Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3**

	plan should cover at least this period, and should be in place and actively managed for the lifetime of the project. Similarly, any early planting (pre-construction) should be included in the maintenance plan as the reduction in effects described in the LVIA are also based on the assumption that this too will have established as planned.	**Embedded Mitigation (APP-076)** illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**) will be implemented and managed in accordance with **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** secured by Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**). The oLEMP sets out the requirement to provide a detailed LEMP which provides the opportunity to further refine the approach to the implementation and establishment of mitigation planting. As stated within Requirement 7(1) of the Schedule 2 of the **Draft DCO**, "*No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*". The oLEMP sets out the outline approach for the initial 5 year establishment maintenance period as well as longer term management beyond his period and monitoring requirements. It is not agreed that the reduction in effects reported in the LVIA is reliant on pre-construction or 'advance' planting. The assessment of effects at Year 0 assumes a recently planted scenario following completion of the Proposed Development.
13.58	Monitoring of the proposals is a key aspect of the mitigation plan and is something which needs further development to ensure there is sufficient robustness to deal with the challenging climatic conditions when it comes to establishing new planting. The updating of the	Paragraph 2.6.43 to 2.4.46 of **Appendix 6.7 - Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (secured by Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) sets out the approach to monitoring and the commitment to develop a full monitoring

	management plan every 5 years after the initial establishment period will go some way to ensuring that it is kept valid and can respond to issues and trends effectively, such as climate change. Plant replacements should also be considered, and also for a longer period then a "standard" 5 years, and cover for scenarios where there are large areas that have not established, or areas of significant die back beyond a 5 years period.	programme, which will be included within the detailed LEMP(s). The detailed approach to plant replacements will be set out within the detailed LEMP(s).
13.59	While the submission includes landscape proposals, these are of a high level and it would be expected that if the project proceeds much more detailed plans would to be submitted and subsequently agreed with the appropriate consultee/authority prior to the commencement of any works, which would be secured as a Requirement of the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification.	The landscape proposals illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** are intended to provide sufficient detail to enable the identification of individual retained and proposed landscape elements intended to provide landscape assimilation and to mitigate key visual effects. A more detailed scheme will be prepared in association with the requirement to prepare a detailed LEMP(s).
13.60	We accept that planting can be an effective way to screen development proposals and add valuable landscape and ecological elements into the landscape, however this needs to be carried out in a way that is sensitive to the existing landscape character or meet any aims of a published character assessment to improve or introduce new planting to an area. While residual visual effects have been assessed as reducing at 15 years through mitigation planting, this is completely dependent upon the successful establishment of the planting and it growing in a manner that is anticipated within the LVIA, and illustrated on the accompanying visualisations. This is always going to be a risk that if the planting does not establish as anticipated, the residual effects will likely be higher than initially judged.	The Applicant agrees that planting can contribute to the screening of development and can provide landscape enhancements. It is also recognised that the planting needs to be introduced in a manner consistent with prevailing landscape characteristics. In this regard, the measures illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** have been designed to complement landscape character through the selection of plant species which are native and characteristic of the locality, adopting measures which reinforce existing landscape pattern and provide linear linkages between existing, isolated areas of vegetation cover. Surface level vegetation cover has been specified in association with an ecologist to maximise biodiversity potential and provide

		enhancements in association with other landscape elements such as hedgerows. To maximise the potential for successful establishment and to fulfil the mitigation requirements the proposed landscape scheme will be implemented and managed in accordance with **Appendix 6.7 - Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (secured by Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**). The oLEMP also sets out the requirement to provide a detailed LEMP which provides the opportunity to further refine the approach to the implementation and establishment of mitigation planting. As stated within Requirement 7(1) of the Schedule 2 of the **Draft DCO**, "*No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*".
13.61	This is an open landscape, and planting to simply screen could have detrimental impacts. The PROW and local roads in the study area enjoy an open aspect across most areas of the Study Area, for example from adjacent residential properties with views across the and land beyond. Therefore, care needs to be taken to prevent the loss of this character through an overbearing set of mitigation proposals. It is noted that appropriate development offsets, and with careful design, will go some way to address the matter raised.	As recognised in **Chapter 6 Landscape and Visuals (APP-057)** of the Environmental Statement, the landscape is relatively open, but the presence of linear vegetation belts and woodland blocks is also characteristic, particularly in relation to the Solar Array Area and the Bespoke Access Road. Views are consistently defined by the presence of this vegetation on the skyline and within intervening layers of vegetation cover. Some of the road network is open but much of the local road network in the area adjacent to the Solar Array Area and the Bespoke Access Road is defined by hedgerows that provide visual enclosure.

		It is acknowledged that the local road network in proximity to the Cable Route Corridor is less enclosed and more open. This context has informed the development of the landscape proposals illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235).** The approach to the landscape scheme has been to strengthen existing boundary features, link existing areas of plantation and scrub and strategically introduce mitigation planting for specific receptors rather than to introduce large scale woodland blocks which would be overly dominant.
13.62	**Cumulative Landscape and Visual Effects:** the ES considers cumulative landscape and visual effects with Heckington Fen Solar Park, Vicarage Drove Solar Farm, Bicker Fen Solar Farm and Little Hale Solar Farm; the latter having recently been granted planning permission on appeal (planning application reference 23/1021/FUL; appeal reference APP/R2520/W/25/3363027).	This statement has been reviewed and noted by the Applicant. The Applicant agrees with the summary of cumulative schemes considered in **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES).
13.63	No 'Significant' landscape or visual cumulative effects are identified in the LVIA. However, we do not support this and have concerns regarding cumulative effects due to the unprecedented number and extent of renewable energy projects and associated infrastructure in the county and region. The mass and scale of several NSIP scale energy projects, along with planned National Grid projects, combined with Beacon Fen has the potential to lead to adverse effects on landscape character over an extensive area across multiple published character areas.	**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. The cumulative assessment has been undertaken in accordance with the scope detailed within **Chapter 4 Scope and Methodology (APP-055)** and utilising **Appendix 4.2 Cumulative Assessment Short List (APP-082)**, the latter of which was agreed by the Council. 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 National Character

		Area (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.
13.64	The landscape character of Lincolnshire will be altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly of agricultural character and land use; solar development is not identified within current published character assessments at a local, regional or national scale. While it is not suggested that agriculture will not remain as a defining characteristic, over a short period of time large scale solar and other energy infrastructure will undoubtably become a widespread characteristic in the county. Subsequently, we judge that solar development would be a key characteristic in any updates to published character assessments from local to national scale.	Concerns relating to wider county level cumulative effects in association with the large number of energy projects within Lincolnshire are acknowledged. However, the cumulative assessment for the Proposed Development needs to take a proportionate approach as recommended in the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3). This has focussed the assessment on development which has the potential to result in significant cumulative effects in association with the Proposed Development rather than considering the cumulative scenario across the county of Lincolnshire which is beyond the scope of the LVIA.
13.65	However, given the absence of a unified, county-wide landscape character baseline across Lincolnshire, this presents a challenge when assessing cumulative effects over a strategic county-wide scale to consider all of these energy projects. Therefore, an approach we are promoting is to extract common landscape attributes of the area from the multiple character area assessments that cover the region, enabling a reasoned, evidence-led baseline, and subsequently assessment, of cumulative landscape effects across the wider county area.	Concerns relating to wider county level cumulative effects in association with the large number of energy projects within Lincolnshire are acknowledged. However, the cumulative assessment for the Proposed Development needs to take a proportionate approach as recommended in the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3). This has focussed the assessment on development which has the potential to result in significant cumulative effects in association with the Proposed Development rather than considering the

		cumulative scenario across the county of Lincolnshire which is beyond the scope of the LVIA. The Applicant has contacted North Kesteven District council (NKDC), Lincolnshire County Council (LCC) and the consultants AAH to set up further engagement opportunities. It is suggested that the approach to cumulative assessment, particularly the wider scope relating to cumulative schemes across Lincolnshire is addressed through this engagement process. An online meeting between the Applicant, North Kesteven District Council (NKDC), Lincolnshire County Council (LCC) and AAH Consultants to discuss outstanding landscape matters is proposed between Deadline 2 and 3 of the examination timetable. However, at this stage, the Applicant considers that the cumulative assessment in relation to the Proposed Development cannot reasonably be expected to consider this wider cumulative scenario.
13.66	For example, across Lincolnshire: • the 'Land Use' is predominantly arable agriculture; • 'Field Patterns' are predominantly medium to large-scale; • the 'Topography' has a predominantly flat to gently undulating landform; • 'Perceptual Qualities' are predominantly quiet and with a rural character and high levels of tranquillity; • the 'Settlement Pattern' is generally dispersed villages and market towns; • 'Vegetation & Tree patterns' are generally open with sparse or isolated tree cover; and • regarding 'Views & Openness', there is generally a strong sense of openness, big skies, and expansive views.	This response has been reviewed and the Applicant agrees with these examples of the point set out and addressed in its response to 13.65.
13.67	Therefore, across the region, based on these shared characteristics large scale solar development and new	This response has been reviewed and is noted by the Applicant. The Applicant acknowledges the concerns relating

	energy infrastructure would create cumulative change of the landscape character through an extensive land use change, directly affecting the perceived openness, and rural tranquillity. We judge large scale solar, battery and energy infrastructure will subsequently be a distinctive key characteristic across the county/region as a whole.	to the wider cumulative scenario. However, taking a proportionate approach in accordance with the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3), it is considered to be beyond the scope of the cumulative assessment to retrospectively consider this wider development scenario in relation to the Proposed Development.
13.68	This would also be an issue when experienced sequentially for visual receptors travelling through the wider landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. However, repeated views and presence of large scale solar would undoubtably increase the susceptibility of receptors to changes in view through 'visual fatigue' in which viewers experience a diminishing capacity to absorb or tolerate repeated or similar visual stimuli (solar development) along routes, eroding the rural landscape character and increasing a broader perception of landscape industrialisation.	The potential for sequential visual effects is acknowledged and has been considered for schemes within the LVIA Study Area (see **Chapter 6 Landscape and Visuals (APP-057)**). It is not agreed that susceptibility of receptors would increase because of 'repeated views and presence of large scale solar'. The term 'visual fatigue' is not recognised in LVIA methodology and references to the ability to tolerate views has implications requiring a level of knowledge beyond the professional capacity of a Landscape Architect. It is agreed that the frequent presence of solar development along a route or journey linking several routes could result in an erosion of rural landscape character. However, the Proposed Development would not notably contribute to sequential effects. This is because of the limited potential for a visual effects pathway to result from transient views of the Proposed Development to the extent that there would be visual associations with other energy infrastructure which is physically separated by considerable distances.
13.69	GLVIA3 defines types of cumulative visual effect as either: Combined (in the same view) or Sequential. Table 7.1 of GLVIA3, regarding Sequential Cumulative visual effects states that "Sequential: Occurs when the observer has to move to another viewpoint to see the same or different	This response has been reviewed and is noted by the Applicant. The Applicant agrees with this definition of cumulative effects.

	developments. Sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths".	
13.70	We judge that the sequential effects would be felt throughout the area, with PROW users, that are more susceptible to changes in their view, moving slowly and often engaging with the landscape attentively. Travel along these PROW presents successive experience with solar infrastructure, creating a sequential visual effect. PROW users traveling along several rights of way have been identified within the applicants LVIA as having significant adverse visual effects at year 15.	It is acknowledged that Public Right of Way (PRoW) users are generally considered to have a higher level of susceptibility. It is also acknowledged that it is possible that some PRoW users may theoretically experience views of the Proposed Development in association with views of other solar infrastructure in a sequential manner. However, considering the separation distances and the nature of the footpath network and linkages, it is considered unlikely that the Proposed Development will be experienced in a sequential manner whereby it evokes strong visual associations with other solar developments.
13.71	If users of these routes had previously, or would subsequently, travel on rights of way or other linear routes with views of other solar schemes (as identified in the LVIAs associated with these projects) the implication is that users would likely experience sequential visual effects across two or more schemes, even at Year 15 when mitigation should have matured. Combined with receptors traveling long distances along road corridors in the region with views of the scheme, this can form a coherent visual narrative; a rural area increasingly defined by clustered energy-infrastructure development.	It is agreed that the frequent presence of solar development along a route or journey linking several routes could result in adverse sequential effects. However, the Proposed Development would not notably contribute to sequential effects. This is because of the limited potential for a visual effects pathway to result from transient views of the Proposed Development to the extent that there would be visual associations with other energy infrastructure, which is physically separated by considerable distances.
13.72	By way of summary and conclusions, AAH state that by virtue of its scale and massing, the development would result in 'Significant' adverse (negative) effects on local landscape character and visual amenity during all key phases (construction, early operation, and at year 15).	**Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports that there would be Significant adverse effects on the Fenland Sub Area and the Holland Reclaimed Landscape Character Area (LCA) at construction as a result of works associated with the Solar Array Area and within the Cable Route Corridor. It is agreed

		that the Proposed Development would fundamentally alter the character of the Solar Array Site area due to the introduction of energy infrastructure within a predominantly agricultural landscape. Effects in relation to landscape elements will be more limited because of the retention of field pattern and associated boundary features and areas of existing vegetation. More widely, the characterising influence of the Proposed Development will be restricted by the retention of perimeter vegetation, proposed supplementary planting and hedgerow management measures that will allow hedgerows to be maintained at a height of up to 3.5m to provide more effective screening. **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) reports that the introduction of the solar arrays and associated energy infrastructure would result in some significant visual effects. These effects would be experienced by a relatively limited number of receptors most of which are in very close proximity to the Proposed Development and up to a maximum distance of ~500m from the order limits A summary of the effects is included within Table 6.8 Landscape and Visual Summary Assessment Matrix of **Chapter 6 Landscape and Visual.** For details of the mitigation measures, reference should be made to Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)**, as well as **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and **Appendix 6.7 outline Landscape and Ecological**

		Management Plan (oLEMP) (secured via Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**).
13.73	The proposals would fundamentally alter the character of the site and its surroundings, replacing open, agricultural fields with extensive solar infrastructure. This represents a substantial and long-term change to the openness, tranquillity, and rural character of the area. Whilst the LVIA categorises residual effects as partially reversible, we consider that, given the likely operational lifespan and scale, the change should be regarded as effectively permanent in landscape and visual terms.	The LVIA **(Chapter 6 Landscape and Visual (APP-057))** reports that the Proposed Development will result in change to the character of the Solar Array Area because of the introduction of energy infrastructure into an agricultural landscape. However, as set out in paragraphs 6.6.5 to 6.6.58 of the LVIA, the landscape structure of the Site area will be largely retained and enhanced. The LVIA also reports that beyond the Site the Proposed Development will have a limited visual influence beyond the immediate context of the Site. This is due to the relatively low height of the solar panels (i.e. 3.5m) and the visual containment provided by retained and proposed vegetation, which will be managed to a height of 3.5m as well as the raised banks associated with the dyke system. The relatively flat nature of the Site and layers of vegetation cover in the wider landscape will also contribute towards limited visual prominence as perceived from the wider landscape. The LVIA has assessed effects associated with the Solar Array Area as long term and partially reversible on the basis that the operation phase of the Proposed Development is anticipated to be for a period of 45 years. After this period the Site could be reinstated to a scenario comparable to the baseline because the existing field pattern, associated drainage ditches and vegetation boundary features will be retained, linked with new mitigation planting and integrated into the scheme design. Therefore, it is considered reasonable to base the assessment on a partially reversible, long term, scenario in accordance with the methodology set out in paragraphs 1.13.10 to 1.13.13 of **Appendix 6.2 Landscape and Visual Methodology (APP-084)** and guidance in paragraph 5.52 of Guidelines for

		Landscape and Visual Impact Assessment (Third Edition, IEMA, 2013).
13.74	Significant adverse visual effects are also predicted for a range of receptors, due to the transformation from rural agricultural views to those containing largescale solar arrays. We have highlighted some issues with the visual assessment within the LVIA and compliance with the recent Landscape Institute Technical Guidance Note LITGN-2024-01, and we also have concerns that the mitigation planting itself could generate adverse visual effects though blocking or foreshortening views and appearing out of context.	It is acknowledged that the Proposed Development would result in Significant adverse visual effects for a range of receptors in close proximity to the Site. These significant adverse effects are considered and balanced against the benefits of the Proposed Development in Chapter 7 of the **Planning Statement (APP-277)**. Following the establishment of mitigation planting, the number of receptors experiencing significant effects will be considerably reduced. **Appendix 6.4 Visual Assessment (APP-086)** provides a description of receptor value and susceptibility to determine receptor sensitivity in accordance with the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and in accordance with The Landscape Institute Technical Guidance Note LITGN-2024-01. These sensitivity levels have been used to inform **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES) for the different receptor groups considered in the LVIA. It should also be noted that receptor sensitivity levels for receptor groups are in accordance with the recommendations in GLVIA3 which are 'high' for residents and PRoW users and 'medium' for users of the road network. In relation to mitigation planting, it is agreed that the baseline landscape is relatively open, but the presence of linear vegetation belts and woodland blocks is also characteristic, particularly in relation to the Solar Array Area and the Bespoke Access Road. Views are consistently defined by the presence of this vegetation on the skyline and within intervening layers

		of vegetation cover. Some of the road network is open, but much of the local road network in the area adjacent to the Solar Array Area and the Bespoke Access Road is defined by hedgerows that provide visual enclosure. It is acknowledged that the local road network in proximity to the Cable Route Corridor is less enclosed and more open. This context has informed the development of the landscape proposals illustrated by **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)**. The approach to the landscape scheme has been to strengthen existing boundary features, link existing areas of plantation and scrub and strategically introduce mitigation planting for specific receptors rather than to introduce large scale woodland blocks, which would be overly dominant. Full details of the mitigation measures are included within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076)** and **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP)** (secured via Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**).
13.75	Cumulative landscape and visual effects with other renewable energy and infrastructure projects across the county present a further concern. Whilst the immediate cumulative schemes within the ES are relatively modest, the scale of other NSIP and large-scale energy projects proposed in the wider area raises the potential for extensive alteration of the regional landscape character. The combined effect of these developments could be a marked and enduring change, both directly through a change in land use and introduction of solar as a key element, and	Concerns relating to wider county level cumulative effects in association with the large number of energy projects within Lincolnshire are acknowledged. However, the cumulative assessment for the Proposed Development needs to take a proportionate approach as recommended in the Landscape Institute's 2013 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3). This has focussed the assessment on development that has the potential to result in significant cumulative effects in association with the Proposed Development rather than considering the cumulative scenario

	also in the perception and experience of the landscape, particularly for visual receptors travelling through the landscape and experiencing sequential effects. This is a clear and marked change to landscape character.	across the county of Lincolnshire which is beyond the scope of the LVIA. It is agreed that the frequent presence of solar development along a route or journey linking several routes could result in an erosion of rural landscape character. However, the Proposed Development would not notably contribute to sequential effects. This is because of the limited potential for a visual effects pathway to result from transient views of the Proposed Development to the extent that there would be visual associations with other energy infrastructure which is physically separated by considerable distances.
13.76	Tree and vegetation removal associated with the development, including wider highways improvements and access for construction, must be clarified through the examination process, and subsequently any works (such as lopping or pruning), or removal of trees and hedgerows must be agreed prior to any works commencing. Prior to any construction activities, all tree and hedgerow protection methods associated with that phase of construction should also be clarified and subsequently agreed with the appropriate authority (in this case the local planning authority) - this would need to be in accordance with BS:5837 'Trees in Relation to Construction' and any subsequent arboriculture method statements, again this should be approved by the appropriate authority.	This response has been reviewed and is noted by the Applicant. The Applicant has invited Lincolnshire County Council, North Kesteven District Council and the consultants AAH to take part in further engagement. This engagement will provide the opportunity to discuss vegetation removal requirements in more detail. At this stage the Applicant can confirm the following: Proposed tree and hedgerow removals, along with pruning and retained tree and hedgerow protection measures that accord with BS 5837:2012 are detailed in **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** for the Bespoke Access Corridor and Solar Array Area. Paragraph 6.14 of the **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** (secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**) includes the provision for BS 5837 compliant Arboricultural Method Statements and Tree Protection Plans to be prepared at the detailed design

		stage. These will be completed for the Bespoke Access Corridor, the Solar Array Area and the Cable Route Corridor.
13.77	In particular, this should ensure that existing trees, and associated root protection areas, are suitably protected throughout the entire construction period. This would also likely include areas within the order limits, but away from construction activity, such as storage areas for materials which may suffer from tracking by plant that would damage tree root protection zones.	This response has been reviewed and is noted by the Applicant. **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** for the Bespoke Access Corridor and Solar Array Area, includes protection details for the retained trees and hedgerows. The Arboricultural Method Statements and Tree Protection Plans that will be produced at the detailed design stage will include protection for all retained tree and hedgerows, including those that are 'away from construction activity'.
13.78	While the submission includes landscape proposals (as shown on Figure 6.31: Landscape Strategy Plan, secured via Work Order 9 on the Works Plans and DCO), these are of a high level and it would be expected that if the project proceeds much more detailed plans would to be submitted and subsequently agreed with the appropriate authority prior to the commencement of any works and secured through Requirements of the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification. The mitigation illustrated on the layout plans has been utilised to assess the landscape and visual effects of the scheme; therefore, we would expect any detailed landscape proposals to consist of the area and extent shown on these plans as a minimum.	The landscape proposals illustrated in **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** are intended to provide a sufficient level of detail to demonstrate the range of proposed landscape elements, how they relate to existing landscape features and the Proposed Development layout. It is recognised that further details will be required and a commitment to provide this further detail is provided and how it is secured is described in **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (in turn secured by Requirement 7 of the **Draft DCO (Document Ref: 3.1)**).
13.79	The Council considers that there is a negative impact on the landscape character of the whole site during construction and the initial years of operation. The impact on visual amenity is negative in respect of 12 residential properties at Ewerby Thorpe Farm, Ewerby Lodge, Howell	The Applicant acknowledges within **Chapter 6 Landscape and Visual (APP-057) of the Environmental Statement (ES)** that the Proposed Development would result in adverse effects on landscape character at the Site level in relation to the Solar Array Area, the Cable Route Corridor and the

	Fen Farmhouse, Asgarby Barns, Westmorelands Farm, Copperhill Kennels, Waithe Farmhouse, the Grange, Ferry Farm, Mere House, Gashes Barn, Crown Cottage and Keepers Cottage. In particular, the residents of Gashes Barn will experience 'overwhelming' residential visual impacts as the property will exceed the RVAA threshold. There would be negative cumulative landscape character and visual effects across the wider area beyond the site.	Bespoke Access Corridor. At operation, Significant adverse landscape effects would be experienced in relation to the Solar Array Area but would reduce to Not significant levels within the Cable Route Corridor and the Bespoke Access Corridor. Significant effects on visual amenity of the specified residential properties would be experienced at Year 0 but would reduce to Not Significant levels following establishment of mitigation planting at year 15 for all properties except Gashes Barn.
14	**Ecology**	
14.1	Paragraph 5.4.42 of EN-1 states that 'development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (…); where significant harm cannot be avoided, then appropriate compensation measures should be sought'.	Section 5.4 of NPS EN-1, along with the Environment Improvement Plan 2023 and Environment Act 2021 have been taken into account in **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** of the Environmental Statement (ES) and in the **Biodiversity Net Gain Strategy (APP-280)** secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1)**. Impacts on ecological receptors have been considered and the mitigation hierarchy applied to first avoid, then minimise impacts and finally where impact remains to compensate for these. Full details of the mitigation measures are included within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**).
14.2	It also notes that due consideration should also be given to regional and local biodiversity and geological designations this is because these sites have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education.	Section 7.5 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** of the Environmental Statement (ES) has reviewed regional and local designated sites. Mitigation for impacts on these is incorporated within Sections 7.6 and 7.7 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** and secured pursuant to Requirement 12 of the **Draft**

		DCO (Document Ref: 3.1). Full details of the mitigation measures are included within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**).
14.3	EN-3 also highlights that solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. Paragraph 2.10.89 notes that "in some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains and which is encouraged'.	The design of the Proposed Development has incorporated biodiversity enhancements where feasible. These enhancements are included in the **Biodiversity Net Gain Strategy (APP-280)** and secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1).**
14.4	CLLP policy S14 'Renewable Energy' states that proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts are, or will be made, acceptable, including in relation to biodiversity and geodiversity considerations	Impacts on biodiversity have been considered in sections 7.6 and 7.8 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** with mitigation for these impacts incorporated in Sections 7.6. and 7.7 of Chapter 7 **Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)**. The mitigation is secured in the **oCEMP (APP-077)** secured pursuant to Requirement 12 of the **Draft DCO (Document Ref: 3.1).** Full details of the mitigation measures are included within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**).
14.5	CLLP policy S59 'Green and Blue Infrastructure Network' states that the Central Lincolnshire Authorities 'will safeguard green and blue infrastructure in Central Lincolnshire from inappropriate development and work actively with partners to maintain and improve the quantity, quality, accessibility and management of the green	The Applicant has based **Figure 6.31 Landscape Strategy Plan (APP-233** to **APP-235**) on enhancements to both the green and blue infrastructure, including hedgerow enhancement, buffers along watercourses and creation of wildflower meadows. This is intended to strengthen ecological connectivity throughout and offsite. These enhancements are

	infrastructure network'. Continuing, the policy notes that 'Proposals that cause loss or harm to the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts. Where adverse impacts on green infrastructure are unavoidable, development will only be supported if suitable mitigation measures for the network are provided'.	secured in **Appendix 6.7 outline Landscape Ecological Management Plans (oLEMP)** (**APP-089**) secured pursuant to Requirement 7 of the Draft DCO **(Document Ref: 3.1)**.
14.6	CLLP policy S60 'Protecting Biodiversity and Geodiversity' states that development proposals will be considered in the context of the relevant Local Authority's duty to promote the protection and recovery of priority species and habitats. If the proposals do cause adverse impacts, then the benefit of the scheme will need to provide benefits the clearly outweigh the harms.	Impacts on biodiversity have been considered in sections 7.6 and 7.8 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)**, with mitigation for these impacts incorporated in Sections 7.6. and 7.7 of the **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)**. In each case, the mitigation hierarchy (avoidance and minimisation of impacts followed by compensation as a last resort) has been applied. The mitigation is secured in **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP) (REP1-009 to REP1-010)** secured pursuant to Requirement 12 of the **Draft DCO (Document Ref: 3.1)**. Full details of the mitigation measures are included within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**).
14.7	Development will only be supported where the proposed measures for mitigation and/or compensation along with details of net gains are acceptable. All developments are required to meet the tests of: Protecting, managing, enhancing and extending the ecological network of habitats, species and sites of international, national and local importance.	The design of the Proposed Development seeks to incorporate biodiversity where feasible. Protection and enhancement of habitats, species and designated sites are detailed in Sections 7.6 to 7.8 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** and secured pursuant to Requirement 12 of the **Draft DCO (Document Ref: 3.1)**. Enhancement of the ecological networks has been

	Minimising impacts on biodiversity and geodiversity value. Delivering measurable and proportionate net gains in biodiversity. Protecting and enhancing the aquatic environment within or adjoining the site, including water quality and habitat.	detailed in the **Biodiversity Net Gain Strategy (APP-280)** and secured pursuant to Requirement 8 of the **Draft DCO.**
14.8	Part 2 of CLLP policy S60 requires developments to seek to preserve, restore and re-create priority habitats, ecological networks and the protection and recovery of priority species set out in the Natural Environment and Rural Communities Act 2006, Lincolnshire Biodiversity Action Plan, Lincolnshire Geodiversity Strategy and Local Nature Recovery Strategy. It further requires that where adverse impacts are likely, 'development will only be supported where the need for and benefits of the development clearly outweigh these impacts' and in such cases, 'appropriate mitigation or compensatory measures will be required'.	The design of the Proposed Development has incorporated biodiversity enhancements where feasible. These enhancements are included in the **Biodiversity Net Gain Strategy (APP-280**) and secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1)**. The impacts on biodiversity resulting from the proposed development have been assessed within Sections 7.6 to 7.8 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** with mitigation set out in Sections 7.6 and 7.7 of the **Ecology Chapter (Document Ref: 6.2 ES Volume 1: 6.2.7).** This mitigation has been secured pursuant to Requirement 12 of the **Draft DCO (Document Ref: 3.1)**
14.9	CLLP policy S61 'Biodiversity Opportunity and Delivering Measurable Net Gains' requires development to deliver at least a 10% measurable biodiversity net gain (BNG) attributable to the development. The net gain for biodiversity should be calculated using Natural England's Biodiversity Metric, and should be provided on-site wherever possible. Unless specifically exempted, a biodiversity gain plan should be submitted providing clear and robust evidence for biodiversity net gains and losses, and which includes details of the pre-development biodiversity value of the onsite habitat, the post-development biodiversity value of the onsite habitat following implementation of the proposed ecological	The **Biodiversity Net Gain Strategy (APP-280)** secured pursuant to Requirement 8 of the **Draft DCO (Document Ref: 3.1)** sets out the biodiversity net gain for the Site. The Proposed Development will achieve an exceedance of the general policy level (10%) of BNG, with a commitment to provide 30% gain in habitat units and a 10% gain in hedgerow units and a 10% gain in watercourse units delivered on-site for 30 years. .

	enhancements/interventions and on ongoing management strategy for any BNG proposals.	
14.10	Finally, CLLP policy S66 'Trees, Woodland and Hedgerows' requires proposals to provide evidence that they have been subject to adequate consideration of the impact of the development on any existing trees and woodland. New developments will also be to retain existing hedgerows where appropriate and integrate them fully into the design having regard to their management requirements. There is an interface here with CLLP policy S60 given the impacts on hedgerows, a habitat of principal importance.	**Appendix 6.6 Arboricultural Impact Assessment (APP-088)** has been produced to assess the arboricultural impacts arising from the proposed development. Hedgerows are retained, where feasible to do so, with hedgerow loss minimised through careful design of the proposed development. **Figure 6.31 Landscape Strategy Plan (APP-233** to **APP-235**) illustrates the vegetation to be retained and **Figure 6.32 Vegetation Removal Plan (APP-236** to **APP-238)** illustrates the vegetation to be removed as part of the Proposed Development.
14.11	The Council has commission specialist advice from AECOM on the topic of ecology. AECOM's full detailed comments are attached at Appendix B.	This statement is noted by the Applicant and the responses are set out, below.
14.12	Overall, AECOM's assessment is that the ecological information and assessments accompanying the application contain a significant number of omissions and/or lack clarity on relevant points. These include matters relating to how prior advice (at EIA Scoping or Preliminary Environmental Impact Report 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, however, as currently submitted the ES chapter on ecology is not considered sufficiently robust to accurately assess the likely impacts on ecological interests across the site.	The Applicant held an initial meeting with North Kesteven District Council (NKDC) and their ecologist on 14th August 2025 discuss the points raised . **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** has been reviewed and further clarification on the approach to the assessment, including the mitigation, presented where necessary below. The Applicant proposes to continue discussions with NKDC on residual points of concern once NKDC have had an opportunity to consider the Applicant's responses and updates at this Deadline 2.
14.13	In summary, omissions highlighted include:	Water bodies were assessed during the **Phase 1 Habitat Survey (Appendix 7.3, APP-092).** No further botanical assessment was identified as necessary for the water courses

	Insufficient discussion and evidence relating to aquatic surveys and whether impacts on aquatic plants were considered The survey effort for quail (a Schedule 1 bird species) notes only four phases of survey in the period mid-May to the end of July as opposed to the required six surveys as set out in prior advice There is an inconsistent approach to the assessment of impact on wintering birds whereby the solar array has been aggregated with the Cable Route and Bespoke Access whereas the latter are two geographically discrete areas No attempt appears to have been made to update the survey baseline on Schedule 1 birds (barn owl, quail and other species that could occur) since the 2022 survey of the solar array area. While the consequences of development for skylark is covered, the consequences for the long term suitability of the site for wintering birds of open farmland is not clearly assessed. This includes further consideration of cumulative impacts. Supplementary data should be provided to verify the status and value of individual hedgerows. If hedgerows are assessed as being of Local Wildlife Site quality they would have a 'county' nature conservation value, not 'local' as stated. This data is also required to support agreement of the BNG baseline. A number of significant adverse effects on the conservation status of ecological receptors are predicted during construction, however the mitigation for these impacts is not confirmed or demonstrated to be adequate so 'significant residual effects' cannot be discounted. This includes significant effects on:	as these are likely to be influenced by agricultural chemical inputs (including fertilisers and herbicides) which would reduce or eliminate biodiversity. Breeding bird surveys were spaced out to cover the whole season (March to July) and capture passage bird species. On the four visits in the late spring/early summer period, no quails were detected (quail were heard in the southern area). However, acknowledging this is a secretive species, Table 7.1 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** has been updated at this Deadline 2 regarding quail to clarify that the mitigation includes preventing access to predators through fencing and the improved food supply uses a worst case approach for ground nesting bird species, such as quail.. The mitigation in Section 7.7 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** is incorporated in a further update to the **Appendix 2.4 outline Construction Environmental Management Plan (oCEMP)** submitted at this Deadline 2 (secured via Requirement 12 of Schedule 2 of the **Draft DCO (AS-088)**) and Appendix 6.7 outline Landscape and Ecological Management Plan **(oLEMP) (APP-089)** (secured via Requirement 7 of Schedule 2 of the **Draft SCO (AS-088)**) Furthermore the impact on ground nesting birds from the development has been reviewed. There will be loss of arable land, however there will be a mix of new grassland types and additional hedgerows to improve the quality of habitats. These will be managed with areas left uncut on a rotational basis which will provide food (seeds and berries) into the winter as well as a greater variety of dwelling opportunities. Compared to the current homogenous arable land the proposed habitats

	Qualifying bird species of The Wash SPA and Ramsar site; The qualifying otter population of The Wash and North Norfolk Coast SAC; Great crested newt – a European Protected Species; Barbastelle bat – a protected and threatened species; and (v) Water vole – a protected and threatened species	will provide much more support for a range of ground nesting birds. With the assessment of wintering birds the Solar Array Area has been treated separately to the Bespoke Access Road and Cable Route Corridor. Once constructed the Solar Array Area will have structures (the solar panels, substation and infrastructure) over the long team (40 years). By contrast on the Bespoke Access Road and Cable Route Corridor there will be little above-ground features post construction with the exception of the Bespoke Access Road itself, which will be the same height as the surrounding features. The landscape for wintering birds will alter. However, following construction, land under the panels will still be available to wintering birds. The newly enhanced / created habitats, including hedgerows and grassland, will provide greater foraging opportunities for birds over winter, whilst the surrounding landscape is still largely open fields. Altogether, this provides a range of opportunities for the local populations of birds over winter. Table 7.7 Importance of Ecological Features in **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** has been updated to include reference to hedgerows of LWS quality being at County value and submitted at Deadline 2. Mitigation for qualifying species of the Wash Special Protection Area (SPA) and Ramsar site and the Wash and North Norfolk Coast SPA have been agreed with Natural England through the **Habitats Regulations Assessment (APP-050)** and secured in the **oCEMP (APP-077).**

		A draft licence for great crested newt was submitted to Natural England and a Letter of no Impediment was received 23rd September 2025. Mitigation for bats, including the avoidance of impacts to flightlines and a commitment to a sensitive lighting strategy, have been outlined in Section 7.7 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** and secured in the **oCEMP (APP-077)**. Mitigation for water vole, including updated surveys once the detailed design is known, and application for licences (discussed with Natural England) has been outlined in Section 7.7 of **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** and secured in the **oCEMP (APP-077).** Full details of the mitigation measures are included within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**).
14.14	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.	The Applicant has previously supplied the full BNG Metric to NKDC for review, based on the Biodiversity Net Gain methods valid at the time of application (DEFRA 2024). The BNG Strategy was based on the biodiversity opportunities proposed in discussion with local planning authorities (meeting 7th February 2024). The Applicant discussed some of the concerns regarding Biodiversity Net Gain (BNG) at the meeting on 14th August 2025, and further discussion is proposed in the context of the SoCG to seek to resolve this matter.

		The Applicant's aim is to submit an updated **Statement of Common Ground with NKDC (REP1-018)** at Deadline 3 of the examination which will address the BNG Metric further.
14.15	AECOM's comments on the BNG Metric are attached at Appendix C. Examples of specific concerns include that the baseline information provided with the report does not account for all habitats, certain habitats have been mistranslated, and the habitat mapping does not appear sufficiently accurate. The 'proposed' habitat plan does not account for all land within the Order Limits; for example, the bespoke access road is not accounted for. Furthermore there does not appear to be any consideration of, and compensation for, impacts on woodland and trees within the submitted BNG information.	The Applicant has provided a Biodiversity Net Gain Strategy (APP-280) and supporting metric which notes baseline habitat units primarily from arable land (1300 units) with some from grassland (500 units) and woodland (approximately 110 units). In light of priority habitat mapping changes shown on Magic maps (DEFRA 2025) around the time of submission the Applicant has reviewed the BNG metric and has amended this at Deadline 2. Further discussions are proposed around small areas of individual habitats with the North Kesteven District Council (NKDC) ecologist in order to identify how biodiversity enhancements can best be acheivd in the region. As the detail of the Bespoke Access Road Route is not known (i.e. the Bespoke Access Corridor / Order Limits cover a wider corridor than will be needed for the Bespoke Access Road), it was not possible to map which habitats will be permanently affected. Habitats along the Cable Route Corridor will be reinstated to their pre-construction state. With the exception of a small area of plantation woodland in the area of Bicker Fen Substation, as referred to in Section 2.4.8 of the **Biodiversity Net Gain Strategy (APP-280)** the woodland habitats will not be impacted.
14.16	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	The Applicant notes the target for development has been exceeded for all biodiversity unit types. Where possible the Applicant has sought to introduce habitats in keeping with Natural England's Natural Character Areas, and the Central Lincolnshire Biodiversity Opportunities Mapping. It also should be noted that the Applicant's scope to deliver higher

	to by Requirement. In 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 of 10% 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'.	watercourse units is more limited as these watercourses are in part controlled by the Internal Drainage Board. NPS EN-1 states that in considering the planning balance, biodiversity net gain should be given "appropriate weight" (paragraph 4.6.3). The Proposed Development would deliver a number of very clear and substantial benefits, including the provision BNG. It will provide, at minimum, a 30% gain in habitat units and a 10% gain in hedgerow units and a 10% gain in watercourse units delivered on-site 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 oLEMP (APP-089)** and secured by a Requirement in Schedule 2 of the **Draft DCO (Document Ref: 3.1)**. The Applicant considers that this commitment, particularly in the absence of any existing target for 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. Details of the calculations are set out in the BNG Metric Calculation spreadsheet provided to NKDC on 8 July 2025.
14.17	On the basis of the advice from AECOM regards the inadequacy of the ES chapter on Ecology, the Council must conclude that the proposals would have a **negative** impact until demonstrated otherwise. Whilst we agree that BNG of over 10% is likely to be secured, and would be **positive**, further details are needed to ensure that it would be in accordance with Central Lincolnshire's BNG guidance. As	This is noted and, as above, the Applicant welcomes the opportunities to discuss the clarifications and / or additional details to demonstrate that there is no negative impact.

	submitted, and summarised above, there are a number of potentially significant omissions from the applicant's BNG submissions meaning that the baseline metric cannot be accepted as accurate at this stage.	
	Cultural Heritage	
15.1	Section 5.9 of EN-1 states that the SoS should consider the impact of a proposed development on any heritage assets and that they should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development.	This comment has been noted by the Applicant. **Chapter 8 Cultural Heritage (APP-059)** supported by **Appendix 8.1 Archaeological Desk Based Assessment (APP-117) and Appendix 8.2 Heritage Statement (APP-118)** sets out the significance of heritage assets as per policy and guidance. Measures to minimise effects to significance through setting change are set out as are avoidance measure to avoided physical impact to buried archaeological remains of relatively higher significance. avoidance measure to avoided physical impact to buried archaeological remains of relatively higher significance.
15.2	In terms of archaeological assets, paragraph 5.9.21 states that where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, then Requirements should be considered to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	. This comment has been noted by the Applicant, and the relevant detail is set out within **Chapter 8 for Cultural Heritage (APP-059)** and **Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. The potential for undiscovered assets during the construction stage has been considered and mitigation is outlined within section 7.9 of **Appendix 8.1 Archaeological Mitigation Strategy (APP-153)**.
15.3	EN-1 seeks consistency with the current National Planning Policy Framework and expands the definition of heritage significance to acknowledge the contribution that can be	This comment has been noted by the Applicant. The importance of setting towards the significance of heritage assets and the potential impact to heritage assets through

	made by setting and alters the wording of paragraphs 5.9.5 and 5.9.6 regarding non-designated archaeological heritage assets of demonstrably equivalent significance to Scheduled Monuments.	setting change is discussed within **Appendix 8.2 Heritage Statement (APP-118**).
15.4	EN-1 also recommends that the applicant prepares proposals that enhance heritage significance and mitigate heritage harm, and considers whether the development effects will be direct, indirect, temporary or permanent. It further identifies a need to weigh any identified less than substantial harm to the significance of a designated heritage asset against the public benefits of the proposal.	This comment has been noted by the Applicant. The policy cited and all impacts are set out within **Chapter 8 Cultural Heritage (APP-059)**, supported by **Appendices 8.1 & 8.2 – Archaeological Desk Based Assessment and Heritage Assessment (APP-117/118)**.
15.5	CLLP policy S47 'the Historic Environment' requires development proposals to protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire including through protecting the significance of heritage assets (including where relevant their setting), and taking into account the desirability of sustaining and enhancing non-designated heritage assets and their setting.	This comment has been noted by the Applicant. Embedded mitigation referenced within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.2 Heritage Statement (APP-118)** references measures to protect the significance of heritage assets through minimising harm through setting change. This includes stand-offs and planting.
15.6	Continuing, the policy states that where a development proposal would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits, including, where appropriate, securing its optimum viable use, outweigh the harm. Finally, development affecting archaeological remains (whether known or potential, designated or undesignated) should take every practical and reasonable step to protect and, where possible, enhance their significance.	This comment has been noted by the Applicant. Compliance with policy is set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.2 Heritage Statement (APP-118)**. Fieldwork undertaken to inform the Proposed Development has sought to avoid archaeological remains of relatively higher significance such that they are protected from adverse impact; their significance being preserved.
15.7	**Above-ground Heritage Assets:** subject to the comments below, the Council is broadly satisfied with the methodology, analysis and outcomes of the ES chapter on Cultural Heritage in relation to the above ground heritage	This comment has been noted by the Applicant. No further response is necessary.

	assets. The key sensitive designated receptors are listed at paragraph 8.6.5 of the ES Chapter on Cultural Heritage while non-designated receptors are listed at paragraph 8.6.6. Embedded mitigation includes creating buffer areas to increase the distance between the site and nearby heritage assets.	
15.8	The Council agrees that at the construction stage, the Bespoke Access Road would have a Moderate Adverse (significant) effect on Grade I Listed St Andrew's Church, Asgarby (paragraph 8.7.7 and Table 8.8). It considers, however, that there would be a similar impact on Grade II Listed Asgarby Hall whose principal elevations look over the historic parkland where the new road would be in full view. Asgarby Hall is not included in Table 8.8 for assessment during the construction phase despite being listed as a key sensitive designated receptor in paragraph 8.6.5. The Heritage Statement identifies that there is potential for impacts to the hall as a result of the introduction of the access road.	The assessment undertaken to inform **Chapter 8 Cultural Heritage (APP-059)** 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 the Proposed Development may cause change, it should be acknowledged that change does not necessarily equate to harm (as set out within Sections 8.4 to 8.7 of **Chapter** 8). During the construction and decommissioning phases of the Proposed Development, there will be a short-term slight adverse effect upon Asgarby Hall due to this asset being set back from the road, with intervening landscape and screening from the dyke boundary; sound and movement from the A17 (to the south) is more perceptible and takes the eye away to the south. During the construction and decommissioning phases, the effect is considered to be slight adverse and not moderate adverse because, even with this (short-term) change, it is still possible to appreciate that the Hall was part of a rural settlement once associated with the church and the agricultural community. It is possible that the assessment from NKDC does not consider the association and functionality of the settlement and the close proximity of

		the very busy A17 road. NB - With the embedded mitigation identified (see **Appendix 2.3 Embedded Mitigation (APP-076)** of the Environmental Statement (ES) and secured through the **Draft DCO (AS-008)**) in place, the impact may be reduced further. The Bespoke Access Road will not change the appreciation of the setting of Asgarby Hall during the operational phase Subsequent to the provision of **Chapter 8 Cultural Heritage (APP-059)** considers and **Appendix 8.2 Heritage Statement (APP-118)** an online (remote) meeting was held with NKDC and LCC on the 15 August 2025 during which it was agreed to undertake an in-person site meeting to view and discuss issues regarding the setting of designated and non-designated heritage assets. The site meeting was undertaken at and near various heritage assets on 5 September 2025. The information gathered from the site meeting is reflected within this response on the individual assets referenced (in that the impact to the specified assets has been clarified). 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). This confirms the assessment as set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.2 Heritage Statement (APP-118)**. 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. This confirms the assessment as set out within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.2 Heritage Statement (APP-118)**.
15.9	During the operational stage, due to the use of the Bespoke Access Route for maintenance purposes, the Council considers that a medium magnitude of impact should be ascribed to Grade I Listed St Andrew's Church leading to a Moderate Adverse (significant) effect.	Within **Chapter 8 Cultural Heritage (APP-059)** and **Appendix 8.2 Heritage Statement (APP-118)**, the impact to St Andrew's Church from the Bespoke Access Route during the operational phase of the Proposed Development would result in a slight adverse effect that is not significant. As set out in the Applicant's response to 15.8, above, the effect of the Proposed Development on St Andrews Church, as identified within **Chapter 8** and **Appendix 8.2** has been confirmed through site observations with NKDC and LCC (undertaken 5 September 2025). The church of St Andrew, Asgarby is set within its own boundary and faces the east and the road running through the settlement. It has the former plantation to the west that once provided a buffer from the graveyard and

		the nearby fields, suggesting seclusion and intimacy for the graveyard. This element of setting has been retained. Combined with the intervening landscape and the screening from the dyke boundary, there would be a moderate (short term) effect during the construction and decommissioning phases and a slight adverse effect during the operational phase were the road will not be viewed; the movement and sound would be greatly reduced and should not be noticed. Sound and movement from the A17 to the south is more perceptible and takes the eye and ear away to the south. Therefore during the construction and decommissioning phases, the effect would be moderate adverse because, even with this change, you can still appreciate that the church was part of a rural settlement once associated with the Hall and the agricultural community. The assessment from NKDC is possibly not considering the association and functionality of the settlement and the close proximity of the very busy A17 road, and that the Bespoke Access Road will be low lying and screened behind existing boundaries.
15.10	The Bespoke Access Route would also impact on the setting of Grade II Listed Boughton House which is not particularly considered in the ES leading to a slight adverse effect being identified during the Operational Phase only (Table 8.9). Boughton House is not included in Table 8.8 for assessment during the construction phase despite being listed as a key sensitive designated receptor in paragraph 8.6.5. The Council considers that the assessment undertaken in relation to Boughton House is insufficient. The Heritage Statement identifies that there is potential for impacts to the house as a result of the introduction of the access road.	To clarify, as referenced within **Appendix 8.2** (**APP-118**) the Bespoke Access Road will have a slight adverse effect on the setting of Boughton House (Grade II Listed). The lack of significant impact is due to the intervening distance and landscape that provides a sufficient buffer. The land rises between the settlements 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 non significant effect 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.

		The impact on these key views is considered limited such that a slight adverse effect only in the worst cases should be included in Table 8.8 of **Chapter 8 Cultural Heritage (APP-059)**.
15.11	Turning to the Solar Array Area, the impact on Howell Hall (Grade II listed) during the operation phase (Table 8.9) 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.	Table 8.9 within **Chapter 8 Cultural Heritage** (**APP-059**) identifies a significance of impact of slight adverse effect. This acknowledges a low magnitude of effect (through setting change) on as asset of medium significance. A request to alter this effect to minor adverse would not be in accordance with the terminology of impacts as referenced by Section 8.4 of **Chapter 8**. To provide reassurance, however, minor adverse and slight adverse could be regarded as interchangeable in terms of the significance of effect.
15.12	Kyme Tower (Grade I listed and associated 'Remains of medieval monastery, moated manor house, fishponds and post-medieval garden'; a scheduled monument) has been considered under the operational phase (Table 8.9) 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*	This is a reasonable summary of the setting of Kyme Tower and that harm would equate to less than substantial harm to the setting of the asset from the proposed development. The application of Tables 8.2-8.4 presented in **Chapter 8 Cultural Heritage** (**APP-059**) during the assessment of impacts provides for the proportionate weighting of an assets' significance in the understanding of overall impact. Table 8.9 clearly assigns a 'High' level of importance to Kyme Tower such that its level of importance is acknowledged appropriately in the overall assessment matrix. The Applicant therefore disagrees that sufficient weighting has not been given. The Applicant also confirms that the correct magnitude of impact, in accordance with Table 8.3 would be low not medium. This is clarified below.

	therefore agrees 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.'	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 Applicant has assesed that the resultant impact would be slight adverse effect on significance.. The embedded mitigation proposed which firmly secures the magnitude of impact within the low parameter as opposed to the medium parameter. (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. This would result in less than substantial harm.
15.13	Finally, the Council considers that insufficient weight has been ascribed to non-designated heritage farmsteads. Despite an acknowledgement of a high magnitude of impact on some occasions with the result of a slight 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)	The application of Tables 8.2-8.4 presented in **Chapter 8 Cultural Heritage** (**APP-059**) during the assessment of impacts provides for the proportionate weighting of an assets' significance in the understanding of overall impact. Table 8.9 clearly assigns a 'Low' level of importance to the farmsteads which are classified as such due to their non designated status reflecting their limited architectural and historic interest. This provides for their correct level of weighting in the assessment of impact. The Applicant therefore disagrees that sufficient weighting has not been given. Therefore, sufficient weight has been given to these assets regarding the effect on their setting resulting within change to the wider and surrounding landscape. The embedded mitigation measures considered during the assessment of impact 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)** (secured through the **Draft DCO (Document Ref: 3.1)**).
15.14	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, Asgarby 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.	As set out in response to questions 15.12 and 15.13 the correct level of weight has been assigned to Kyme Tower and the non-designated farmsteads. The issues regarding Asgarby Church of St Andrew, Asgarby Hall, Kyme Tower, Howell Hall and Boughton House have been viewed in greater detail with NKDC. 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 imbued functional and historic association. For all three assets this immediate setting will not be compromised and, as such, effects through setting from change are Not Significant. The embedded mitigation is flexible enough to allow for bespoke individual assets and reduce the impact through change within the historic landscape.
15.15	In view of these conclusions, the Council considers that there will be a **negative** impact on above-ground heritage assets as listed above.	Sufficient weight has been given to these assets regarding the effect on their setting resulting within change to the wider and surrounding landscape and it is accepted that a there would

		be a negative impact on above ground assets resulting in less than substantial harm. ot 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, slight adverse effect. 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. 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 is agreed that there would be a negative impact on above ground heritage assets. That impact would equate to less than substantial harm.
15.16	**Archaeology:** the Council has an arrangement with Lincolnshire County Council for the provision of archaeological advice on behalf of NKDC. The Council supports the views of the LCC's Historic Environment (Infrastructure) Officer which are provided below.	This comment has been noted by the Applicant. No further comment is necessary.

15.17	The authorities are satisfied that the assessment in the ES 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. It has allowed the early identification of any issues and opportunities to allow easy incorporation of solutions into the programme and production of a fit for purpose archaeological mitigation strategy.	This Applicant welcomes this comment. No further comment is necessary.
15.18	Consultation and communication between the applicant and LCC have been effective and timely, with feedback and comments incorporated into the documents throughout the process. This has benefitted the archaeological assessment, improved the methodology employed and enhanced the final output.	The Applicant welcomes this comment. No further response is necessary.
15.19	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). These have been completed to the required level, utilising the appropriate sources and to the appropriate standards set out by the Chartered Institute for Archaeologists, Historic England and guidance within the Lincolnshire Archaeological Handbook1 (Lincolnshire County Council 2024).	The Applicant welcomes this comment. No further response is necessary.
15.20	The desk-based assessment has been accompanied by aerial investigation and mapping survey (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	The Applicant welcomes this comment. No further response is necessary.

	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), which have been completed to the appropriate standards.	
15.21	These desk-based and non-intrusive surveys, particularly the aerial investigation and mapping and the geophysical survey, have facilitated a comprehensive understanding of the landscape within which the Beacon Fen Energy Park and associated connection infrastructure is proposed. This has allowed the proposed scheme to identify and design out potential impacts at an early stage and inform the intrusive trenching evaluation strategy.	The Applicant welcomes this comment. No further response is necessary.
15.22	The programme of trenching for the main solar array area has been completed (Appendix 8.10 Trial Trenching Report - Solar Array Appendix 6.3.73) and furthermore substantial parts of the access route trenching has been done (Appendix 8.10b Trial Trenching Report - Targeted Area on the Access Route Appendix 6.3.74).	The Applicant welcomes this comment. No further response is necessary.
15.23	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.	The Applicant welcomes this comment. No further response is necessary.
15.24	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 Applicant welcomes this comment. No further response is necessary.
15.25	The archaeological assessment therefore fulfils the requirements set out within the National Planning Statement Policy EN1 (Section 5.8), the National Planning	The Applicant welcomes this comment. No further response is necessary.

	Policy Framework and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states that *"The EIA must identify, describe and assess in an appropriate manner…the direct and indirect significant impacts of the proposed development on…material assets, cultural heritage and the landscape."* (Regulation 5 (2d)).	
15.26	The methodological approach employed for Beacon Fen Energy Park utilises the Rochdale Envelope (Chapter 4 – Scope & Methodology Document Reference: 6.2 ES Volume 1, 6.2.4 Chapter 4 Section 4.3). Where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and proportionate mitigation. The Beacon Fen Energy Park project has completed this to the satisfaction of the authorities through appropriate and adequate trenching evaluation of the full impact zone and the timely provision of the results to inform the baseline evidence which has been used to create a fit for purpose mitigation strategy in advance of the DCO submission.	The Applicant welcomes this comment. No further response is necessary.
15.27	The draft archaeological mitigation strategy was provided to LCC for comment, in advance of the submission of DCO (Appendix 8.11 Archaeological Mitigation Strategy Document Reference: 6.3 ES Volume 2, 6.3.74).	The Applicant notes this comment. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** sets out the strategy for assessing, evaluating the potential for archaeology across the Proposed Development and the methods for avoiding impact on that potential, and where necessary recording areas of low significance that may be impacted by the Proposed Development.

15.28	The archaeological mitigation strategy 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 mitigation requirements have been set out by field survey, including the prior survey works, assessment of significance and type of mitigation required.	The Applicant notes this comment. No further comment is necessary.
15.29	The archaeological mitigation strategy 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 LCC.	The Applicant notes this comment. No further comment is necessary.
15.30	The updated archaeological mitigation strategy has been submitted to LCC, which has addressed the comments we had raised on the earlier draft. This includes a section specifically covering public engagement and outreach; public benefit is a key component of archaeological work and had been omitted from the initial draft.	. This comment has been noted by the Applicant. **Appendix 8.11 Archaeological Mitigation Strategy (APP-153**) has incorporated the requested additions and the approach for mitigation has now been agreed.
15.31	Where further trenching is proposed within areas where access was not possible previously, this will occur post-DCO. The authorities are content for this to occur at that stage. The archaeological mitigation strategy contains the required mechanisms for updating the scope of mitigation to incorporate new areas of archaeological interest, should they be encountered during the next phase of trenching.	This comment has been noted by the Applicant, and it is set out within **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)**.
15.32	The draft DCO wording for Requirement 11 is appropriate and acceptable to the authorities and there is no need for any revision. As drafted, it provides a robust and enforceable Requirement that is suitable for the Beacon Fen Energy Park DCO, should it be consented.	This comment has been noted by the Applicant

15.33	On that basis the Council considers that there is a **neutral** impact on below-ground heritage assets.	The Applicant welcomes this comment. No further response is necessary
	Access and Traffic	
16.1	Paragraph 5.14.18 and 5.14.19 of EN-1 sets out the that the SoS should consider the substantial impacts of traffic and therefore should ensure 'that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the SoS should consider requirements to mitigate adverse impacts on transport networks arising from the development'. Moreover, applicants may be willing to enter planning obligations to for funding infrastructure and otherwise mitigating adverse impacts.	The Applicant acknowledges this statement and the consideration of the Proposed Development with this policy is set out within the **Planning Statement (APP-277)**.
16.2	With regards to mitigation, EN-1 states that the SoS may attach requirements to a consent where there is likely to be substantial HGV traffic that control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements, make sufficient provision for HGV parking including to avoid prolonged queuing on approach roads and ensuring satisfactory arrangements for reasonably foreseeable abnormal disruption (paragraph 5.14.14).	The Applicant acknowledges this statement and has no further comment to make.
16.3	Section 2.10 of EN-3 makes a number of recommendations in relation to accessibility and public rights of way, noting that the suitability of the access routes to the proposed site for both the construction and operation of the solar farm must be considered, with the former likely to raise more	The Applicant acknowledges this statement and has no further comment to make.

	issues. With reference to public rights of way, the draft advises that applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users accordingly. They are also encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation, and to provide enhancements to public rights of way and the adoption of new public rights of way through the site.	
16.4	CLLP Policy S47 'Accessibility and Transport' requires development to contribute towards an efficient and safe transport network and that proposals should demonstrate, where appropriate, that they have had regard to the need to minimise additional travel demand through the use of measures such as travel planning, safe and convenient public transport, walking and cycling links and integration with existing infrastructure. The policy also sets out that any development that has severe transport implications will not be granted planning permission unless deliverable mitigation measures have been identified, and arrangements secured for their implementation, which will make the development acceptable in transport terms.	The Applicant acknowledges this statement and has no further comment to make.
16.5	For Beacon Fen Energy Park, construction vehicles will primarily access the Site via the proposed Bespoke Access Route from the A17. A secondary construction access route is from Halfpenny Toll Lane at the northern boundary of the site.	Within **Appendix 9.1 Transport Assessment (TA) (APP-155-157)**, paragraph 4.2.21, details the proposed emergency and operational access to the Solar Array Area. The Applicant confirms that access from Halfpenny Toll Lane at the northern boundary of the Site is a secondary access point to facilitate emergency and operational vehicular access, not construction access as detailed in the North Kesteven District Council (NKDC) comment.

16.6	Appendix 3.2 of the ES comprises a Bespoke Access Road Options Appraisal which sets out an appraisal of the existing highway access and options, describing the general constraints to construction access utilising the existing highway. It is followed by an appraisal of the options for a Bespoke Access Road. The Council notes that use of the existing public highway routes (ultimately, via the A17) were deemed unsuitable without significant mitigation measures and upgrade works to facilitate the proposed development due to their inability to accommodate the required traffic volume and type of traffic, in particular Abnormal Indivisible Loads (AILs). Furthermore the impact to local communities would likely be extensive given the rural and agricultural nature of the surrounding area.	The Applicant acknowledges this statement and has no further comment to make.
16.7	Since the Council is not the Local Highway Authority, it defers comment on traffic and transport matters to LCC. The ES notes that the Baseline Annual Average Daily Traffic (AADT) for the A17 is around 18,000 to 19,000 vehicles for the period 2021 to 2028 (future baseline) of which around 16% is comprised of HGV movements. Principal construction access to the site will be from the A17, with a left-in/left-out arrangement with connectivity to the site via the Bespoke Access Road.	The Applicant acknowledges this statement and has no further comment to make.
16.8	The Bespoke Access Road also provides embedded mitigation in respect of proposed abnormal loads. The ES notes that there are two types of abnormal loads that will need to access the main solar array. Firstly, flatbed HGVs for the delivery of cable drums, which are oversized loads of approximately 80 tonne gross weight, and are less manoeuvrable than standard articulated HGVs. Secondly, transformers which are anticipated to be circa 160 tonnes in weight, with a total gross vehicle weight of 240 tonnes.	The Applicant acknowledges this statement and has no further comment to make.

	The transformers are transported by girder frame vehicles of approximately 57m in length.	
16.9	Over the 34-month estimated construction period, for the totality of the project (including the cable corridor and Bicker Fen substation works) the ES calculates a generation of 118,819 two-way light vehicle movements and 37,230 two-way HGV Vehicle movements. This represents a 0.9% to 1.2% increase above the baseline levels in terms of movements on the A17, and up to a 5% increase along Carterplot Road and Cowbridge Road associated with the cable corridor and Bicker Fen substation works. The applicant notes that these traffic levels are substantially below the IEMA guidance which recommends adopting a 30% change threshold for where a 'significant' effect might occur. The combination of the use of the A17 and the Bespoke Access Road will account for 93% and 75.7% respectively of all light and HGV vehicle movements associated with the construction phase.	Table 9.12 Access and Traffic - Summary Assessment Matrix of **ES Chapter 9 Access and Traffic (APP-060)** quantifies the construction traffic impact compared to baseline and shows a percentage change of 1.5% on Carterplot Road. The Applicant agrees with the summary provided by North Kesteven District Council (NKDC) in this statement, but wanted to provide clarification regarding the percentage change on Carterplot Road, as detailed above.
16.10	However, whilst the Council notes that the proposed Bespoke Access Road represents the applicant's preferred highway solution its benefits will require to be balanced against its impacts on the landscape of the area and – as above - the nearby above and below ground heritage assets.	The Applicant acknowledges this statement. The indicative route of the Bespoke Access Road has evolved on balance, taking into account potential adverse and beneficial impacts upon a range of wider environmental considerations and aiming to minimise adverse impacts. Section 4.5 Option 2 of **Appendix 3.2 Bespoke Access Road Appraisal (APP-080)** discusses the benefits and limitations of the route, with potential benefits in terms of landscape and views included within paragraph 4.5.8 and potential limitations in respect of heritage and archaeology included within paragraph 4.5.10. As stated within paragraph 3.5.14 of **Chapter 3 Alternatives & Design Evolution (APP-054)** of the Environmental Statement (ES), the Applicant undertook a

		number of rounds of review in order to identify the most suitable access route for the Solar Array Area, and a summary of this is included within Table 3.3 Identification of Bespoke Access Corridor of **Chapter 3**. It was through the review process that Option 2 emerged as the preferred option and, following the development of the Bespoke Access Corridor, it was considered within the 2024 **Preliminary Environmental Information Report (PEIR) (Document Ref: ST19595-REP-002)**. Statutory Consultation was then undertaken as part of the continued design evolution, having regard to the consultation feedback that was received. As per Table 3.3 of **Chapter 3**, the corridor was narrowed and refined in respect of archaeology and dense areas of archaeological potential avoided (informed by the geophysical survey (see **Appendix 8.8 Geophysical Survey Report - Cable and Access Routes (APP-128 to APP-148)**) and the targeted trial trenching (see **Appendix 8.10b Trial Trenching Report - Targeted Access Route (APP-152)**) that were undertaken), as well as hedgerows and veteran trees; avoiding these wherever possible (see **Appendix 6.6 Arboricultural Impact Assessment (APP-088)**). In respect of archaeology, **Chapter 8 Cultural Heritage (APP-059)** of the ES initially identifies a significant adverse effect in relation to below ground heritage within two fields (i.e. fields A5 and A6), but with the mitigation measures described in paragraph 4.1.4 of **Appendix 8.11 Archaeological Mitigation Strategy (AMS) (APP-153)** (agreed by Lincolnshire County Council and secured via Requirement 11 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**) in place, this would be reduced to not significant. In respect of above ground heritage assets, **Chapter 8** draws upon

		Appendix 8.2 Heritage Assessment (APP-118) and the embedded mitigation included within the **Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)**, **Appendix 2.5 Outline Decommissioning Environmental Management Plan (APP-078)** and **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)**, secured by Requirements 12, 7 and 18 of the Draft DCO, respectively. Within **Chapter 8**, Section reports a significant adverse effect upon the Church of St Andrew, Asgarby, a Grade I Listed Building (NHLE 1061832) during both construction and decommissioning. This will, however, be short-term and reversible and only lasting for the duration of each phase and will cease once each phase comes to an end. As the Bespoke Access Road would be a low-lying feature in the landscape and screened by existing boundaries, the effect during operation will reduce to not significant. In respect of landscape and views, the indicative alignment of the Bespoke Access Road has been informed by the requirement to minimise landscape impacts by, where possible, routing the road to the edge of field boundaries and utilising existing gaps in hedgerows to minimise disruption to landscape pattern and reduce vegetation loss, as illustrated in **Figure 1.4 Indicative Site Layout Plan (APP-195)**. Within **Chapter 6 Landscape and Visual (APP-057)**, Table 6.8 Landscape and Visual Summary Assessment Matrix provides a summary of the likely significant effects. In relation to the Bespoke Access Road, Table 6.8 reports significant adverse effect on the landscape of the Bespoke Access Road site, but that this effect would be contained and would not extend beyond the immediate context of the Bespoke Access Corridor

		(or significantly affect the Central Clays and Gravels Sub Area). Residual significant visual effects would be similarly limited and experienced by a single receptor group; Public rights of Way (PRoW) to the west of Asgarby and only in relation to short sections of the network. These effects would cease following completion of the decommissioning phase of the Proposed Development. At circa 3 km (see paragraph 2.2.10 of **Chapter 2 Proposed Development (APP-053)**), Option 2 is the shortest of the route options considered. It also connects the Solar Array Area directly to the existing A17, which was the preference of the consultees approached (see Table 9.1 Access & Traffic Consultation within **Chapter 9 Access and Traffic (APP-060)**). As reported within paragraphs 9.6.15 and 9.6.16 of **Chapter 9**, the Bespoke Access Road will minimise potential impacts upon local roads (including upon local communities and other road users) by removing construction traffic (including Abnormal Indivisible Loads (AIL)) from the existing highway network. The public roads present within the vicinity of the Solar Array Area are not designed to support the weight and demands of heavy equipment and their use may result in damage, leading to costly maintenance and repairs. By utilising the Bespoke Access Road, construction, maintenance and decommissioning activities can be carried out efficiently whilst preserving the condition of public roads and avoiding unnecessary disruptions.
16.11	It is notable that the applicant had not fixed the access strategy at the point of their s42 statutory consultation. In its PEIR response, the Council noted that they considered: *'there to be limited justification for the retention of the haul road post-construction mindful of the limited number of*	The Applicant acknowledges the comments made by North Kesteven District Council (NKDC). Justification for the retainment of the Bespoke Access Road is not related to traffic volume during operational period, but the

	operational/maintenance vehicles anticipated. In this context paragraph 9.3.13 notes that "whilst equipment replacement traffic has not been quantified, intensity of activity on site, and hence traffic generation, will be substantially lower than during the construction phase. Therefore, it is likely that traffic impact on local roads during equipment replacement will not be material."	potential for transformer failure during the life of the Proposed Development, which was identified during further work that fell after statutory consultation. The Applicant has detailed this justification in its response to TT.1.2 in its **Responses to ExQ1 (Doc. Ref. 9.6).**
16.12	Furthermore, the Council noted paragraph 9.6.17 of the draft ES which concluded that: *"given that the Construction Effects of the Proposed Development are negligible, and allowing for access during equipment replacement via lightly trafficked local roads, it is very likely that Equipment Replacement would have negligible and Not Significant effects". This seems to support a proposition that the haul road does not need to be retained beyond the construction phase and that local roads between the A17 and the site can thereafter be used. However, the applicant should supply tracking/swept paths details for all vehicle types expected for operational phases to demonstrate accessibility and whether any localised highway improvements are required".*	The Applicant acknowledges this response and provides justification for retaining the Bespoke Access Road beyond the construction phase of development in the response to point 16.11 above. Furthermore, paragraphs 9.6.11 to 9.6.17 of **Chapter 9 Access and Traffic (App-060)** of the Environmental Statement (ES) outline the benefits of retaining the Bespoke Access Road during the operational phase of development. Swept Path Analysis (SPA) for the maximum length vehicles that will be required to access the Solar Array Area during construction are provided in Appendix E and F of **Appendix 9.1 Transport Assessment (TA) (APP-155-157)**. These include a 16.5m articulated Heavy Goods Vehicle (HGV), 27.6m lowbed trailer Abnormal Indivisible Load (AIL) and 16-axle girder trailer AIL. It is assumed that the same type of vehicles may be required to facilitate Equipment Replacement. The TA concludes that the SPA drawings in Appendices E and F demonstrate that the vehicles can enter/egress the Site safely (refer paragraphs 4.2.11 and 4.2.18 of the TA). Any streets subject to street works, alteration of layout or temporary alteration of layout are outlined in Schedule 4 of the

		Draft DCO (Document Ref: 3.1) and illustrated on **2.5 Streets, Rights of Way and Access Plans (AS-007)**.
16.13	As above, the proposal to incorporate the Bespoke Access Road has only been fixed in the period post-statutory consultation and therefore whilst we defer comment on traffic and transport matters to LCC as the Highway Authority, we would encourage the examining authority to balance the consideration of the access options to the main solar array area against its impacts on the landscape of the area and above and below ground heritage assets; notwithstanding the Council's overall assessment of impacts in relation to the latter.	The Applicant acknowledges this statement and has no further comment to make. Table 6.8 within the LVIA **(Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement (ES)) provides a summary of significant effects and which aspect of the Proposed Development is predicted to result in those effects. In relation to the Bespoke Access Road it has been found that there would be significant adverse effects on the landscape of the Site but that these effects would be contained and would not extend beyond the immediate context of the Bespoke Access Corridor or significantly affect the Central Clays and Gravels Sub Area. Residual significant visual effects would be similarly limited and experienced by a single receptor group; PRoW to the west of Asgarby and only in relation to short sections of the network. The indicative alignment of the Bespoke Access Road has been informed by the requirement to minimise landscape impacts by, where possible, routing the road to the edge of field boundaries and utilising existing gaps in hedgerows to minimise disruption to landscape pattern and reduce vegetation loss as illustrated in **Figure 1.4 Figure 1.4 Indicative Site Layout Plan (APP-195).** For archaeology **Appendix 8.11 Archaeological Mitigation Strategy (APP-153)** has set out how this section of the Bespoke Access Road will be mitigated, archaeological monitoring followed by strip, map and record excavation, and this approach has been agreed by LCC. This will result in

		mitigation by record the accepted method for archaeological mitigation. For above ground heritage this is set out in sections 8.4 to 8.7 of **Chapter 8 Cultural Heritage (APP-059)** were there will be an impact during the construction and decommissioning phases on the heritage cluster at Asgarby and a lesser impact during the operational phase, and that this will be mitigated by the buffer and intervening landscape and the screening from the dyke boundary which will be infilled and enhanced as set out within **Appendix 2.3 Embedded Mitigation (APP-076).**
16.14	The development also seeks to protect and enhance the existing public right of way network. The Council would also defer comment on Public Rights of Way to LCC although the Council recognises that the provision of an extension to PROW Ewer/12/1 (subject to the final routeing being agreed) would respond positively to broader policy objectives in the CLLP. In particular, the Council would be supportive of the creation of a circular walking route that could be provided from the connection of this extension to the surrounding PROW network. The socio-economic, community and public health benefits are more fully described in paragraph 22.17.	Comment noted. The Applicant is familiar with Stepping Out Walks and considers the existing Heckington Walk in the assessment of recreation in **Chapter 15 Socio-economics (APP-066)**. The Applicant proposes to submit plans to show a circular route, secured through the enhancement of footpath Ewer/12/1, and commits to providing signage to raise awareness of the route The circular route will be included in Stepping Out Walks library with a PDF route map. The applicant also commits to design, erect and maintain suitable signage of the route.
16.15	The extension would be a permissive path for the duration of the development. While the precise route would be determined following the designed design of the development and would be discharged via draft DCO Requirement 15, it is anticipated that it would extend in a south and easterly direction along the Car Dyke then head south-west on the north side of Hodge Dike. An undetermined number of footbridges (unlikely to be more	The Applicant acknowledges this statement and has no further comment to make.

	than eight in total) will be required to cross existing watercourses and will require Internal Drainage Board agreements. The path would be provided and open to the public one year following the date of final commissioning of the solar arrays.	
16.16	The Council is concerned regards the temporary closure of PROW KkLT/4/2 save under the direction of the undertaker as there is no definition of the timescale for the temporary period or provision for an alternative route in the draft DCO, though it is assumed that it will be for the duration of the construction period only (as stated in ES paragraph 15.5.16). This footpath provides the sole off-road link between Asgarby and Kirkby La Thorpe.	Public Right of Way (PRoW) KkLT/4/2 crosses the Bespoke Access Road between the villages of Asgarby and Kirkby la Thorpe. Temporary closure of KkLT/4/2 is proposed during construction of the Bespoke Access Road, as set out at Schedule 5 Part 1 of the **Draft DCO (Document Ref: 3.1)**. A Public Rights of Way (PRoW) Management Plan (Document Ref: 9.5) is being prepared and will be submitted at Deadline 2. The PRoW Management Plan details the temporary closure of KkLT/4/2 and proposes management measures proposed including; survey of use, information, signage, site speed limit, managed PRoW diversions within construction boundary (to minimise temporary closure), defined boundaries to Cable Corridor works and look out person, driver training and surface quality to be agreed with Lincolnshire PRoW team (refer Table 1).
16.17	The Council is also concerned regards the temporary closure of PROW Heck/2/4 save under the direction of the undertaker as there is no definition of the timescale for the temporary period or provision for an alternative route in the draft DCO, though it is assumed that it will be for the duration of the construction period only (as stated in ES paragraph 15.5.17). This footpath is part of the Heckington Fen route of Stepping Out Walk network of footpaths across North Kesteven. The network is of local importance to the tourism economy and for public health.	Public Right of Way (PRoW) Heck/2/4 crosses the Cable Route Corridor to the north-east of Heckington. Short term closures of Heck/2/4 to ensure safety of vulnerable users during Cable Route construction activities are proposed, as set out at Schedule 5 Part 1 of the **Draft DCO (Document Ref: 3.1)**. A Public Rights of Way (PRoW) Management Plan (Document Ref: 9.5) is being prepared and will be submitted at Deadline 2. The PRoW Management Plan details the closure of Heck/2/4 is anticipated to be temporary (up to a week likely),

		with management measures proposed including information, signage, site speed limit, driver training, defined boundaries to works and look out person and restoration.
16.18	The Council raises concerns that farm accesses will be cut off by the Bespoke Access Road and requests that the proposed plans demonstrate how landowner access to the fields adjacent to the energy park will be maintained.	The Bespoke Access Road Construction Method Statement (APP-075) states: '*Designated farm accesses will be provided along the Bespoke Access Road to enable continued farming on the surrounding land. Location, gradient, and length of access will be agreed with landowners during detailed design prior to construction and once the design of the Bespoke Access Road has been confirmed.'* Whilst the document does defer this to detailed design, there are indicative access and crossing points shown in the indicative alignment within the Bespoke Access Road Construction Method Statement. Affected landowners were consulted on the plans prior to submission.
16.19	In summary the proposed development would have a **neutral** impact on access and traffic.	The Applicant acknowledges the statement and has no further comment to make.
	Noise and Vibration	
17.1	Paragraph 5.12.15 of EN-1 states that developments should demonstrate good design through selection of the quietest cost-effective plant available; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.	This statement is acknowledged and noted by the Applicant; no further response required.
17.2	The NPS also states that the decision maker should not grant development consent unless it is satisfied that the proposals will avoid significant adverse impacts on health and quality of life from noise, mitigate and minimise other adverse impacts on health and quality of life from noise and	This statement is acknowledged and noted by the Applicant; no further response required.

	where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	
17.3	Moreover the decision maker should consider if mitigation methods needed for construction and operational noise over and above any which may form part of the project application. The mitigation methods may include consideration of layout to ensure adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural barriers, or other buildings and administrative controls such as restricting activities allowed on the site including specifying acceptable noise limits.	This statement is acknowledged and noted by the Applicant; no further response required.
17.4	EN-3 includes construction (including traffic and transport noise and vibration) as a specific factor to consider. The accompanying text does not however identify specific effects related to noise (aside from the volume of traffic potentially associated with construction activities).	This statement is acknowledged and noted by the Applicant; no further response required.
17.5	CLLP policy S14 'Renewable Energy' supports the principle of new renewable energy schemes, including ancillary development, subject to the direct, indirect, individual and cumulative impacts on (inter alia) the amenities of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic being satisfactorily addressed.	This statement is acknowledged and noted by the Applicant; no further response required.
17.6	CLLP policy S53 'Design and Amenity' requires all development, including extensions and alterations to existing buildings, to achieve high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all. Under the 'Uses' sub-heading of the	This statement is acknowledged and noted by the Applicant. No significant effects are concluded and reported **in Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES).

	policy, this includes a requirement for development to 'not result in adverse noise and vibration taking into account surrounding uses nor result in adverse impacts upon air quality from odour, fumes, smoke, dust and other sources'.	
17.7	In addition, the value of retaining trees and hedgerows in terms of reduced noise impacts from development is recognised in paragraph 11.7.2; the preface to CLLP policy S66 'Trees and Hedgerows'.	This statement is acknowledged and noted by the Applicant. Tree and hedgerow retentions for the Bespoke Access Corridor and Solar Array Area are detailed in the **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** and accompanying Tree Protection Plans within the report.
17.8	Paragraph 10.2.3 of the ES state that activities associated with the construction and decommissioning phases of the proposed development have the potential to give rise to significant noise effects at the nearest Environmentally Sensitive Receptors (ESRs). The ES measured noise from 4 locations within the proposed development. Overall, 28 noise sensitive receptors, comprising primarily residential properties and farms, were identified up to a distance of 675m from the boundary of the application site. The location of the receptors were agreed in advance with NKDC Environmental Health officers.	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience short-term and reversible negligible adverse to minor adverse significance of effect from construction and decommissioning activities, which are Not Significant.
17.9	Section 10.7 of the ES concludes that following the implementation of the Construction Environmental Management Plan (CEMP); the residual effects from construction traffic, site construction works and decommissioning will be negligible and not significant.	This statement is acknowledged and noted by the Applicant; no further response required.
17.10	Paragraph 10.7.7 concludes that for all ESRs, however, there will be a moderate adverse effect as a result of operational noise due to industrial noise from electrical components installed within the solar arrays. The specific infrastructure components which emit sound are the inverters, transformers and Power Conditioning Units	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience long-term and reversible moderate adverse significance of effect from operational activities which is Not Significant.

	associated with the solar PV and BESS. Noise emissions from the solar inverters will not occur during periods of darkness.	
17.11	However, the BESS, which includes inverters, transformers and PCUs is required to operate at any time which may include during periods of darkness, and therefore the noise emissions from it have been assessed on their own during this period. There are 11 receptors located close to the boundary of the solar array area which will have noise impacts. These are not deemed to be significant as assessed in Section 10.5. These results are shown in Tables 10.23 to Table 10.26. The proposals have been designed to locate the BESS and onsite substation within the centre of the site to maximise the distance from ESRs, ensuring a minimum distance from ESRs to any noise emitting plant.	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience long-term and reversible moderate adverse significance of effect from operational activities which is Not Significant.
17.12	The 11 receptors which will experience noise impacts are: R1: The Farm Kitchen Limited, Thorpe Road, Ewerby R2: Ewerby Thorpe Lodge, Ewerby R3: Austhrope Top House, Ewerby R4: Copperhill Kennels Cattery, Ewerby R5: Cooks Farm House, Ewerby R6: Gashes Barn, Ewerby R7: West Grange, Howell R8: Fen Farm, Howell Fen R8: The Old Rectory, Howell R10: Tythe Lodge, Howell R11: Crown Cottage, Howell	This statement is acknowledged and noted by the Applicant; no further response required.
17.13	There will the potential for inter-project cumulative effects in relation to construction activity in the event that the construction of the proposed development (including the Cable Route Corridor and works at Bicker Fen Substation)	Paragraph 10.8.1 to 10.8.8 of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that inter-cumulative effects associated with construction activities of the Proposed Development and the

	overlaps with that of the nearby developments. These are not considered to be significant and would be temporary in nature.	committed development schemes in Table 10.27 Summary of cumulative developments of **Chapter 10 Noise and Vibration** would experience a negligible significance of effect should the schemes overlap that is Not Significant.
17.14	The Council is satisfied that the assessment methodology is correct and concur with the outcomes. The Council is also satisfied that potential sensitive receptors have been identified. There is a high risk of adverse impacts during the construction and decommissioning phases, however, mitigation is proposed, and noise/vibration can be addressed through a CEMP by using best practicable means. This will ensure a risk of noise that is deemed to be not significant.	This statement is acknowledged and noted by the Applicant; no further response required.
17.15	For the operational phase, there is a potential risk of noise impacts to sensitive receptors based on the data provided by the applicant. The applicant proposes that a full noise assessment and mitigation scheme will be provided as part of Requirement 14 prior to the commencement of the solar array, BESS and onsite substation.	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience short-term and reversible negligible adverse to minor adverse significance of effect from construction and decommissioning activities which are Not Significant
17.16	The ES notes, at table 10.24 that for the daylight period between 07:00 and 19:00 (Solar Panels and BESS), sound rating levels of between 42-45db will be experienced at Receptors R1 to R11, equivalent to between a 5-12db increase above existing background noise levels. For the period between 19:00 and 22:00 (Solar Panels and BESS), the level of change varies between 8-18db above background.	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience long-term and reversible moderate adverse significance of effect from operational activities which are is Significant.
17.17	For all receptors R1 to R11 the ES notes that the worst-case magnitude of change is 'Medium', and the sensitivity of the receptor is 'Medium' and as such, the significance of effect is 'Moderate Adverse' and 'Potentially Significant'.	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience long-term and reversible moderate adverse

	However, the applicant has confirmed that when considering the internal ambient sound level within an ESR, a worst-case scenario has been used which assesses internal sound levels through a partially open window; which otherwise provides approximately 15 dB attenuation. The applicant notes that as such, the recommended internal sound levels (in accordance with BS 8233) will be achieved for habitable spaces, where the daytime period effect is judged as 'Negligible' and 'Not Significant'.	significance of effect from operational activities which is Not Significant.
17.18	For the nighttime period (between 23:00 and 04:00) and for the BESS only, the ES estimates that noise levels will vary between 11-20db above background. For receptors R1 to R11 and where the background sound level is ≤35 dB LA90, the worst-case magnitude of change is 'Medium', and the sensitivity of the receptor is 'Medium' and as such, the significance of effect is 'Moderate Adverse' and 'Potentially Significant'. However, the same window attenuation performance has then been assumed, reducing the overall impact to 'not significant'.	Table 10.28 Noise & Vibration - Summary Assessment Matrix of **Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES) reports that receptors will experience long-term and reversible moderate adverse significance of effect from operational activities which is Not Significant.
17.19	The ES also confirms that specific noise attenuation measures have not yet been developed (pending finalising of the scheme design) and as such that other than providing for a tonal element, the submitted operational noise estimates do not include any further reduction/s based on site-specific acoustic mitigation being applied. Instead, the ES advises that a further noise assessment/modelling will be undertaken once the site layout is confirmed so that precise mitigation methods can be provided. However, it is expected that mitigation will bring the noise impacts down to not being significant.	Embedded mitigation for operational noise is reported in **Paragraph 10.5.10** to **10.5.16 of Chapter 10 Noise and Vibration (APP-061)** of the Environmental Statement (ES). The assessment assumes **that the embedded mitigation (detailed within Appendix 2.3 Embedded Mitigation (APP-076)**) will be in place. With the embedded mitigation in place, **Chapter 10 Nosie and Vibration (APP-061)** reports that receptors will experience long-term and reversible moderate adverse significance of effect from operational activities which is Not Significant.
17.20	Cumulative impacts have been considered for noise and deemed as not being significant.	Inter-cumulative and intra-cumulative effects have been considered within Section 10.8 of **Chapter 10 Noise and**

		Vibration (APP-061) and **within Chapter 18 Cumulative Effects (APP-069)** of the Environmental Statement (ES). No significant cumulative effects are reported.
17.21	The Council is satisfied that the oCEMP has considered all relevant matters which would normally be outlined. The Council recommends that site working hours during the construction phase are amended and brought into line with NKDC guidance (07:00 to 18:00 hours Monday to Friday and 08:00 to 13:00 hours on Saturdays with no noisy construction work on Sundays or Bank Holidays). As per section 2.3.3, out of hours working should be agreed with the Council, in advance of them taking place. Noise, vibration and dust have been considered, along with potential sensitive receptors. The CEMP appears to be aiming to achieve Best Practical Means.	This statement is acknowledged and noted by the Applicant; no further response required.
17.22	The Council considers that the impact of noise and vibration is **neutral** however this would be predicated on a layout-specific acoustic mitigation scheme being prepared which addresses and mitigates the change in decibel levels summarised above for both the daytime and nighttime periods.	This statement is acknowledged and noted by the Applicant; no further response required.
	Water Resources and Flood Risk	
18.1	Sections 5.8 and 5.16 of EN-1 focuses on flood risk as well as water quality and resources. In the decision-making process, the SoS should note that all activities that discharge to the water environment are subject to pollution control. Moreover, the SoS will 'generally need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework Directive'.	The Applicant has reviewed this statement. **Appendix 11.6 Water Framework Directive (WFD) Assessment** (**APP-167**) concluded that the Proposed Development is unlikely to include any activities that are likely to cause deterioration in the WFD status for the surface and ground water or prevent the water bodies from achieving its WFD objectives, provided that best practice and established guidance are adhered to.

18.2	EN-1 also states that the SoS 'should consider whether appropriate requirements should be attached to any development consent and/or planning obligations entered into to mitigate adverse effects on the water environment' (paragraph 5.16.16).	The Applicant considers that Requirements 5, 10, 12 and 18 included in the **Draft DCO (Document Ref: 3.1)** are appropriate to mitigate adverse impacts on the water environment.
18.3	Paragraph 5.8.7 of EN-1 notes that new energy infrastructure should only be permitted by exception in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), and that it should be safe for its lifetime without increasing flood risk elsewhere and, where possible, should reduce flood risk overall. It should also be designed and constructed to remain operational in times of flood. Paragraphs 5.8.9 and 5.8.10 confirm the requirement for the flood risk sequential and exception tests to be applied.	The Sequential Test has been applied as referenced in Section 4.4 of the Site Selection Report (SSR) which is Appendix 2 of the **Planning Statement (APP-277).** Environment Statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** applies the second part of the Exception Test, confirming how mitigation has been embedded into the design of the Proposed Development and detailing the additional mitigation measures that are required to ensure that the Proposed Development will remain operational in times of flood and will be safe for its lifetime, without increasing the risk of flooding elsewhere. This is secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**.
18.4	The guidance confirms that the Exception Test should only be engaged where "the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified". The examples of such 'relevant policies' which would provide a clear reason for refusing potential alternative sites are those relating to landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites.	The Applicant has reviewed this statement and considers that no response is required.

18.5	Paragraph 2.10.60 of EN-3 also set out that applicants for solar generating stations will need to consider several factors when considering the design and layout of sites, including "proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land – use and ability to mitigate environmental impacts and flood risk".	The Applicant has reviewed this statement and considers that no response is required.
18.6	Paragraph 2.10.84 then notes that where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES and will need to consider the impact of drainage. It notes that as solar PV panels will drain to the existing ground, "the impact will not, in general, be significant".	The Applicant has reviewed this statement and confirms that Environmental statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** was submitted as an appendix to ES **Chapter 11 Water Resources and Flood Risk (APP-062)**, and provides an Outline Drainage Strategy (Section 8 of ES **Appendix 11.1 Flood Risk Assessment (APP-162)).**
18.7	Paragraph 54.10.145 also notes that where previous management of the site has involved intensive agricultural practice, "solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management".	The Applicant has reviewed this statement and considers that no response is required.
18.8	CLLP policy S21 'Water Efficiency and Sustainable Water Management' sets out that in addition to the wider flood and water related policy requirements contained in policy S21, all residential development or other development comprising new buildings with outside hard surfacing, must ensure such surfacing is permeable unless technical considerations dictate otherwise.	The Applicant has reviewed this statement and confirms that the Outline Drainage Strategy (Section 8 of Environmental statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)**) adopts the use of Sustainable Drainage Systems (SuDS), including permeable surfacing. The surface water drainage scheme is secured pursuant to Requirement 10 of the **Draft DCO (Document Ref: 3.1)**.
18.9	CLLP policy S14 'Renewable Energy' supports proposals for renewable energy schemes, including ancillary development, where the direct, indirect, individual and cumulative impacts are or can be made acceptable, which with reference to point (i) includes flood risk, albeit there are	The Applicant has reviewed this statement and considers that no response is required.

	no further references to flood risk under the 'Additional matters for solar based energy proposals' subheading.	
18.10	CLLP policy S20 'Resilient and Adaptable Design' requires design proposals to be adaptable to future social, economic, technological and environmental requirements in order to make buildings both fit for purpose in the long term and to minimise future resource consumption, including that they are resilient to flood risk, from all forms of flooding.	The Applicant has reviewed this statement and confirms that Environmental statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** demonstrates that with mitigation embedded into the design of the Proposed Development, it will be resilient to all forms of flooding and remain operational during the lifespan of the development. This is secured pursuant to Requirements 5 and 10 of the Draft **DCO (Document Ref: 3.1)**.
18.11	CLLP policy S21 'Flood Risk and Water Resources' requires all proposals that are likely to impact on surface or ground water to consider the requirements of the Water Framework Directive and that with specific relevance to flood risk that they will be considered against the NPPF, including application of the sequential and, if necessary, the exception test.	The Applicant has reviewed the statement and confirms that **Appendix 11.6 Water Framework Directive Assessment** (**APP-167**) of the Environmental statement (ES) considers the likely impacts on surface and groundwater in relation to the Water Framework Directive (WFD). The Applicant confirms that the proposals have been considered against the National Planning Policy Framework (NPPF) and that the Sequential Test has been applied as referenced in Section 4.4 of the Site Selection Report (SSR), which is Appendix 2 of the **Planning Statement (APP-277).** ES **Appendix 11.1 Flood Risk Assessment (APP-162)** applies the second part of the Exception Test, confirming how mitigation has been embedded into the design of the proposed development and detailing the additional mitigation measures that are required to ensure that the proposed development will remain operational in times of flood and will be safe for its lifetime, without increasing the risk of flooding elsewhere. This is secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**.

18.12	Amongst other things proposals are required to demonstrate that they are informed by and take account of the best available information from all sources of flood risk and by site specific flood risk assessments where appropriate; that the development will be 'safe' during its lifetime taking into account the impacts of climate change, that flood defence integrity is not impacted, that wider scope for flood risk reduction has been considered and that where appropriate they have incorporated Sustainable Drainage Systems (SuDS).	The Applicant has reviewed this statement and confirms that Environmental statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** is based on the best available information including but not limited to bespoke fluvial flood modelling and UKCP18 climate change data. The layout of the development and the proposed construction methods ensures that the integrity of flood defences will not be impacted and will remain fully accessible for maintenance. The Outline Drainage Strategy (Section 8 of ES **Appendix 11.1 Flood Risk Assessment (APP-162)**) adopts the use of Sustainable Drainage Systems (SuDS), including permeable surfacing. These measures are secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**.
18.13	Finally CLLP policy S59 'Green and Blue Infrastructure Network' states that proposals that cause loss or harm to the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts.	The Applicant has reviewed this statement and confirms that the surface water drainage strategies for the Solar Array Area, Cable Route Corridor and Bespoke Access Road as outlined in Section 8 of Environmental statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** will make use of sustainable green and blue Sustainable Drainage Systems (SuDS) options where feasible to minimise impact on the wider downstream networks. The surface water drainage scheme is secured pursuant to Requirement 10 of the **Draft DCO (Document Ref: 3.1)**. The Applicant has based **Figure 6.31 Landscape Strategy Plan (APP-233** to **APP-235**) on enhancements to the green and blue infrastructure, including hedgerow enhancement, buffers along watercourses and creation of wildflower meadows. This is intended to strengthen ecological

		connectivity throughout and off-site. These enhancements are secured in **Appendix 6.7 outline Landscape and Ecological Management Plan (oLEMP)** (**APP-089**), secured via Requirement 7 of Schedule 2 of the **Draft DCO**.
18.14	A Flood Risk Assessment has evaluated multiple sources of flooding and has evaluated that the western areas of the Solar Array Area are location in Flood Zone 1 (little or no risk) while the eastern areas are located in Flood Zone 3 high probability. The maximum depth of fluvial flooding within the Solar Array Area is estimated as being 0.69m within the fields south of Gashes Barn and adjacent to Hodge Dike. The risk of flooding within the Cable Route Corrider range between low to high. For example, the Bicker Fen Substation, which requires expansion as part of the development, is located within Flood Zone 3. The risk of fluvial flooding within the Bespoke Access Corridor is generally considered to be low with areas of high risk. No parts of the main solar array site are located in a Source Protection Zone.	The Applicant agrees with the summary of the baseline flood risk provided by North Kesteven District Council (NKDC) in this statement and has no further comment to make.
18.15	Those parts of the site located in Flood Risk Zones 1 and 2, meet the Sequential Test, however, as there are some parts of the development which are not located in lower flood risk areas then the Sequential Test much be applied.	The Applicant confirms that the Sequential Test has been applied as referenced in Section 4.4 of the Site Selection Report (SSR) which is Appendix 2 of the **Planning Statement (APP-277).**
18.16	The submitted Flood Risk Assessment refers to the site selection process as the means by which potential development sites within 10km of Bicker Fen Substation were identified as suitable for a solar development of 400-600MW generation. Paragraph 2.2.6 of the FRA states that land around the Bicker Fen Substation is located within Flood Zone 3 and that owing to the size of the Solar Array Area, it would not be feasible to locate all panels and	The Applicant agrees with the summary provided by NKDC in this statement and has no further comment to make. We also note that in recent weeks government has published revised Planning Practice Guidance in respect of sequential test which removes some specificity and now requires a

	infrastructure solely within the areas of Flood Zone 1 and 2 to the west of the substation. Paragraph 2.2.8 of the FRA confirm that no parts of the development will be impacted by flooding from any source that would render it inoperable and therefore, that the Sequential Test is passed.	proportionate approach to be adopted in sequential assessment.
18.17	The site selection process is also presented as Appendix 2 of the Planning Statement, the Site Selection Report which is discussed at Section 10 of this LIR. It concludes that the three PASs did not present more favourably in terms of a lower risk of flooding when considered against other constraints such as proximity to heritage assets or land ownership consideration.	The Applicant agrees with the summary provided by NKDC in this statement and has no further comment to make. The Applicant also notes that in recent weeks government has published revised Planning Practice Guidance in respect of sequential test which removes some specificity and now requires a proportionate approach to be adopted in sequential assessment.
18.18	The Exception Test provides a method of allow necessary development to proceed in situations where suitable sites at lower risk of flooding are not available as demonstrated by the Sequential Test. EN-1 paragraph 5.8.10 states that: *'The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural*	The Applicant agrees with the summary provided by NKDC in this statement and has no further comment to make.

	Beauty, SSSIs and World Heritage Sites which would not usually be considered appropriate.'	
18.19	The Council notes the conclusions of the FRA at paragraphs 2.1.8 and 2.2.8 and Site Selection Report at paragraph 5.1.7 that the Sequential Test has been passed. However, the Council notes that the applicant, in applying the Sequential Test, has discounted sites which are not contiguous in nature. This approach has not been fully justified since there are examples of other solar farms within North Kesteven which are not contiguous in nature such as Springwell Solar Farm and Fosse Green. The applicant has also ruled out sites where there is not a willing landowner thus discounting the use of Compulsory Acquisition procedures. The Council considers that this is a matter which the Examining Authority should examine further alongside the site selection process described in Chapter 3 of the ES.	This statement is acknowledged and noted by the Applicant. As set out in paragraph 3.4.7 of the Site Selection Report (Appendix 2 of the **Planning Statement (APP-277)**), collections of non-continuous sites which when taken together cover an area greater than 300 ha were not considered as there would be likely increased costs in surveying, designing, screening, connecting and legally securing (with reference to land ownership) multiple separate sites which would impact viability and make them incomparable to the continuous Proposed Development. For example, non-continuous sites pose issues around the need for additional cabling (for inter-array connections) and electrical infrastructure (for example, substations). This has an impact on the timing for delivery and the viability of the scheme.
18.20	As the development cannot fully be located within Flood Risk Zones 1 and 2, it requires to be assessed against the Exception Test.	This statement is acknowledged and noted by the Applicant.
18.21	It must demonstrate that: It would provide wider sustainability benefits to the community that outweigh the flood risk; and Will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall.	This statement is acknowledged and noted by the Applicant.
18.22	The FRA includes details on how the development would meet the Exception Test in paragraphs 2.2.11 to 2.2.16. This includes the significant contribution that the	The Applicant agrees with the summary provided by NKDC in this statement and has no further comment to make.

	development will make providing a source of renewable energy, that the mitigation measures will ensure the development will remain operational at all times, that safe access and egress routes will be incorporated into the development, that surface water runoff will be managed sustainably and that necessary fluvial floodplain compensation will be provided.	
18.23	The FRA paragraphs 7.2.3 to 7.2.11 describe the mitigation to address the implications of the fluvial flooding within the solar array area. Transformers will be located on raised bunds extending to 600mm above the maximum depth of flooding. Based on the proposed layout plans, 74 transformers will be located within the flood extent and would need to be on raised bunds. The exact height of the bunds will be confirmed with the Environment Agency (EA). A small area in the north-east corner of the proposed BESS and onsite substation is also to be located within the extent of the flooding.	The Applicant agrees with the summary provided by NKDC in this statement and has no further comment to make.
18.24	The construction of a plateau for the BESS and onsite substation will result in a minor loss of floodplain storage and will require mitigation at detailed design stage. This will comprise lowering areas of higher ground adjacent to the flood extent to create additional storage in continuity with the floodplain. The solar panel tables will have a maximum height of 3.5m with a minimum leading edge of 0.8m above ground level. Where flood depths are deeper than 0.2m, the panels will be taller with a maximum height of 3.9m and a minimum leading edge of 1.3m above ground level. This will allow for up to 600mm freeboard above the maximum modelled flood depth of 0.69m (figure 2.4 shows the variation in panel heights).	The Applicant agrees with the summary provided by NKDC in this statement and has no further comment to make.

18.25	Further surface and foul water drainage details would be agreed as part of the draft DCO requirements via Requirement 10. In agreement with the EA, the Council considers that an additional Requirement should be provided to ensure that details of the proposed floodplain compensation measures are submitted and agreed with the relevant planning authority in consultation with the EA.	The Applicant considers that floodplain compensation measures are secured in Requirement 5 (Part 1c) of Schedule 2 of the **Draft DCO (Document Ref: 3.1),** which requires detailed design approval for proposed finished ground levels. 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 Environment Agency at its own discretion during the determination of the requirement should it determine the Environment Agency's input is required.
18.26	The Council notes that the ExA [document reference PE-009] has suggested an amendment to the draft DCO relating to the Springwell Solar Farm development that would remove solar panels from areas of Flood Zone 3B (EN010149-000883-ExA Schedule of Changes to dDCO.pdf) on the basis that the ExA is unconvinced that there is an operational need for solar PV panels within this area of high flood risk. The Council considers that the Examining Authority should adopt a similar approach in respect of the Beacon Fen development in satisfying himself that there is an operational need for locating solar panels outwith Flood Zones 1 and 2.	Environment Statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** assess the risk of flooding to the Site and the impact of the Proposed Development on flood risk. Flood risk mitigation has been embedded into the design of the Proposed Development (as detailed within Appendix 2.3 Embedded Mitigation (APP-076)) and the Flood Risk Assessment provides detail on the additional mitigation measures that are required to ensure that the Proposed Development will remain operational and safe for users in times of flood for its lifetime without increasing flood risk elsewhere. This is in accordance with the second part of the Exception Test outlined in Paragraph 031 of the Planning Practice Guidance for Flood Risk and Coastal Change. The proposed development will also result in no net loss of floodplain storage or impede water flows. This is in accordance with the requirements for Essential Infrastructure within Flood Zone 3b as outlined in Paragraph 079 of the Planning Practice Guidance for Flood Risk and Coastal Change. This is secured pursuant to Requirements 5 and 10 of the **Draft DCO (Document Ref: 3.1)**.

18.27	The Council considers the risk associated with flooding to be negative.	This comment is acknowledged by the Applicant. It is considered that Environment Statement (ES) **Appendix 11.1 Flood Risk Assessment (APP-162)** demonstrates that all existing flood risk can be mitigated to ensure that the site will be operational and safe for users during flooding, without increasing the risk of flooding to offsite areas. The overall impact is, therefore, considered to be neutral.
	Climate	
19.1	Section 4.10 of EN-1 addresses climate change adaptation in energy infrastructure development. It notes that the SOS should take the effects of climate change into account when developing and consenting infrastructure, referring also to the potential long-term impact of climate change.	This statement is acknowledged and noted by the Applicant.
19.2	EN-1 further states that new energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure (paragraph 4.10.8).	This statement is acknowledged and noted by the Applicant.
19.3	The SoS should be satisfied that applicants for new energy infrastructure have considered the potential impacts of climate change using the latest UK Climate Projections available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure (EN-1 paragraph 4.10.3).	This statement is acknowledged and noted by the Applicant.
19.4	EN-1 notes the energy NPSs should speed up the transition to a low carbon economy and thus help to realise UK	This statement is acknowledged and noted by the Applicant.

	climate change commitments sooner than continuation under the current planning system.	
19.5	Paragraph 2.3.5 notes the UK economy is reliant on fossil fuels, and they are likely to play a significant role for some time to come. Most of our power stations are fuelled by coal and gas. The majority of homes have gas central heating, and on our roads, in the air and on the sea, our transport is almost wholly dependent on oil.	Historically, coal-fired power generation provided a significant proportion of the UK's grid electric. It is important to note that there is virtually no coal generation left anymore, in large part due to the introduction of solar PV schemes, such as the Proposed Development.
19.6	Paragraph 2.3.6 identifies that the UK needs to wean itself off such a high carbon energy mix; to reduce greenhouse gas emissions, and to improve the security, availability, and affordability of energy through diversification. EN-1 also notes that storage has a key role to play in achieving net zero and providing flexibility to the energy system.	This statement is acknowledged and noted by the Applicant.
19.7	Section 4.10 of EN-1 focuses on climate change adaptation and reiterates the need to minimise the most dangerous impacts of climate change.	This statement is acknowledged and noted by the Applicant.
19.8	EN-3 (paragraphs 2.10.65 and 3.10.149), requires the applicant to consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.	This statement is acknowledged and noted by the Applicant.
19.9	CLLP Policy S11 'Embodied Carbon' requires schemes to reduce the development's embodied carbon content, through the careful choice, use and sourcing of materials. Policy S11 also requires applicants to demonstrate that they have considered options and opportunities for the use of lower embodied carbon materials; and which gains weight from 1 January 2025, with a further requirement to take opportunities to minimise embodied carbon.	This statement is acknowledged and noted by the Applicant.

19.10	CLLP policy S14 'Renewable Energy' sets out the position that renewable energy schemes will be supported where the direct, indirect, individual and cumulative impacts on the following considerations are, or will be made, acceptable. The criteria-based sections of the policy, including under the sub-heading of 'Additional matters for solar based energy proposals' are considered elsewhere in this LIR.	This statement is acknowledged and noted by the Applicant.
19.11	The supporting text to policy S14, at paragraph 3.3.4 sets out that in Central Lincolnshire, 'the aim of the Joint Committee that prepared this Plan is to maximise appropriately located renewable energy generated in Central Lincolnshire, as confirmed in Policy S14 below. The Policy sets no floor or cap on the scale of renewable energy targeted to be generated, preferring, instead, an approach which supports all appropriate proposals that meet the policy requirements set out.'	This statement is acknowledged and noted by the Applicant.
19.12	In addition, and with particular relevance to the BESS, paragraph 3.3.19 sets out that 'in order to support a move to a zero carbon Central Lincolnshire there is a need to move away from fossil fuels (gas, petrol, diesel, oil) towards low carbon alternatives and this transition needs to take place with increasing momentum in order to stay within identified carbon saving targets'. Continuing, it sets out that 'Energy storage including battery storage, consideration of existing and new electricity substations and energy strategies for large developments are required to help support the future energy infrastructure needs for Central Lincolnshire'.	This statement is acknowledged and noted by the Applicant.
19.13	CLLP policy S16 'Wider Energy Infrastructure' notes that the Joint Committee is 'committed to supporting the transition to net zero carbon future and, in doing so, recognises and supports, in principle, the need for	This statement is acknowledged and noted by the Applicant.

	significant investment in new and upgraded energy infrastructure'. The policy offers support for proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, including energy storage facilities and upgraded or new electricity facilities (such as transmission facilities, sub-stations or other electricity infrastructure).	
19.14	However, the policy caveats that any such proposals should take all reasonable opportunities to mitigate any harm arising, not only in terms of the appropriate locations for such facilities but also design solutions (cross referring to CLLP Policy S53) which minimises harm arising.	This statement is acknowledged and noted by the Applicant.
19.15	As set out above, the 'green thread' running through the NKDC the Climate Action Plan (CAP), the Climate Response Strategy, its Environment Policy, the NK Plan 24-27 and its Community Strategy is the Council's vision for a sustainable carbon reduction transition by 2030 for both North Kesteven District Council (NKDC) and the District of North Kesteven, supported by mitigation measures to reduce emissions and adaptation measures to improve resilience to the effects of climate change.	This statement is acknowledged and noted by the Applicant.
19.16	The Council's Climate Response Strategy is the corporate strategy for the Council's carbon reduction ambitions within North Kesteven. 'Aim 2' of the Climate Response Strategy is to 'support the district of North Kesteven to move towards a 95% reduction in carbon emissions from energy compared to 2005 levels, by 2030, with offsetting and/or negative emissions technologies to be used only for the final 5% of emissions from hard to eliminate sources'.	This statement is acknowledged and noted by the Applicant.
19.17	The ES states that while Beacon Fen Energy Park will produce some greenhouse gas emissions throughout its lifecycle (from construction, operational maintenance and	This statement is acknowledged and noted by the Applicant.

	repair, and decommissioning), a whole lifecycle greenhouse gas assessment has been carried out in order to assess the net greenhouse gas impact. This assessment considers the potential emissions caused by the development against the potential emissions savings by the renewable energy generated. The design of Beacon Fen Energy Park includes embedded mitigation measures such as the reuse of materials onsite and recycling of waste materials. Furthermore, there will be strategy of landscape enhancement.	
19.18	The nature of Beacon Fen Energy Park is to have a beneficial positive impact compared to the generating technology it is most intended to replace in terms of greenhouse gas emissions. The ES estimates that the Embodied Carbon for the proposed development amounts to 865,997 tonnes (CO2) (tCO2e) – including assumptions for the replacement of components. It is expected that it will take 4.33 years to offset this (through the displacement of fossil fuel generation) and that compared with a natural gas equivalent generation potential, it will save 7,993,168 tCO2e over the 40-year operational lifetime, which is a beneficial impact.	This statement is acknowledged and noted by the Applicant.
19.19	Paragraph 12.6.1 states that an annual panel replacement rate of 0.2% has been used in the ES. It is also assumed in paragraph 12.6.5 that the BESS would be replaced every 10 years.	This statement is acknowledged and noted by the Applicant.
19.20	The Council notes that its suggestion that the scheme should investigate methods to increase in-situ carbon sequestration over and above leaving the land under solar arrays in a fallow state has not been addressed in Table 12.2.	The proposed option of leaving the land below the panels in a fallow state will increase carbon storage through the accumulation of organic matter in soils, as well as above ground biomass.

		There are limited options to increase carbon sequestration beyond this panels. The planting of specific CO_2 absorbing grasses is one option, but these would still need to be maintained to a low level to prevent interference with the panel's generation potential. As reported in Tables 3, 4 and 5 of the **Biodiversity Net Gain Strategy (APP-280)**, in part to compensate for the 511.71 ha loss of habitat across the Solar Array Area, with a further 6.63 ha loss across the Bespoke Access Corridor, and 0.69 ha loss across Cable Route Corridor, there is proposed habitat creation covering 519.04 ha, mainly comprising 461.07ha of modified grassland and 14.60 ha of lowland meadow. These areas of planting will sequester carbon as the vegetation grows. Additional sequestration potential would arise from the 2.78 km of native hedgerow planting proposed at various locations around the Solar Array Area, with an additional 1.38 km of enhanced hedgerow. These hedgerows will provide additional screening and ecological enhancement as well as providing carbon storage and sequestration.
19.21	In terms of cumulative effects, the ES at Table 12.2 (in relation to consultee response 12.9) states that 'Emissions saving during the operational phase will also affect the global receptor, rather than specific local receptors, and generation exported to the grid is not a direct local benefit, as it could be used anywhere across the UK. Its generation effects are therefor in cumulation with all the other solar farms in the country rather than those within the list of local cumulative receptors addressed in the rest of the application. As a result, we take a slightly different stance	It is obviously very important to consider most environmental effects at the local level. Landscape and visual impacts, glint and glare, transport, etcetera will all have potential for obvious local effects. Generation from the solar farm can be nominally attributed to the local area, but as referenced in paragraph 2.5.14 of **Chapter 12 Climate Change (APP-063)** of the Environmental Statement (ES), once exported to the national, grid the electricity could be used anywhere where demand

	to that discussed in the Heckington Fen application.' Despite this global and national view, it is still necessary to understand the impacts locally as this global/national view could ultimately see panels covering every open agricultural area in Lincolnshire and may not be considered cumulatively significant if compared to a national focus.	exists, albeit with greater losses incurred the further it travels across the network. Any direct carbon emissions associated with the onsite construction and operation, will be released to atmosphere and will not be in any way constrained to the local area. They will be blown on the winds and disperse around the planet, contributing to global climate change. Similarly, any embodied emissions associated with the construction of the panels, transformers, substation and Battery energy Storage System (BESS), which may well occur outside the UK, will contribute to the global receptor. In terms of climate resilience, this does have potential to effect local receptors. The loss of local agricultural land is evidently a cause for concern for North Kesteven District Council (NKDC), and there is a potential for this to have some climate implications in terms of increasing food miles if food has to be imported from elsewhere. However, as set out in **Chapter 12 Climate Change**, it is not possible to accurately estimate where such food imports may be sourced from. If crops in East Anglia replace the loss of crops in Lincolnshire, the change in emissions levels is likely to be marginal. The Ukraine still exports cereals to the UK despite the conflict it faces. These will likely have slightly higher emissions than cereals from the UK due to increased food miles, soil degradation and fertilizer use. Food imports from Europe may benefit from carbon emission reduction programmes such as the LIFE carbon farming project.

19.22	Within the ES, it is stated that no formal monitoring is required (paragraph 12.8.7) in relation to climate change matters. However, the Council strongly recommends ongoing monitoring as best practice to ensure transparency in regard to how this proposal helps the national net zero/carbon reduction agenda and how this would be contributing over the 40-year period. Specifically, the Council's view is that monitoring and reporting requirements should be imposed in relation to emissions data and renewable energy generation figures. This is especially relevant where it is recognised that the Greenhouse Gas assessments within the ES are dependent on the quality of data and in some cases have been estimated.	Although not recorded as 'formal monitoring' within the ES, there will be ongoing monitoring of generation from the Proposed Development undertaken at the export meters and other electrical meters onsite and these could be used to directly confirm the carbon emissions saved versus other technologies generating on the electricity network. Additionally, emissions from construction and operation are monitored, audited, verified and reported on a portfolio level for all of the Applicant's existing sites. The Applicant monitors emissions and carbon intensity (emissions per unit of energy generated) on a site-level basis internally. The Applicant would be willing to provide this information once per annum once the data is gathered as part of its own annual monitoring activities. Normal annual operating emissions are expected to be minimal, with ground upkeep, panel cleaning, and infrastructure maintenance all contributing very small amounts to total annual emissions. Nevertheless, the Applicant agrees that transparency in monitoring and reporting on carbon intensity and avoided emissions is an essential and beneficial element of renewable energy companies, as it evidences and communicates the alignment with the national net zero/carbon reduction agenda.
19.23	Overall, the proposed methodology is reasonable and it is agreed that the proposal would have a **positive** impact in regard to the national net zero/carbon reduction targets and green energy agenda.	This statement is acknowledged and noted by the Applicant.
	Glint and Glare	
20.1	EN-1 does not contain specific guidance on glint and glare in respect of solar farms. Paragraph 5.5.55 of EN-1 refers	This statement is acknowledged and noted by the Applicant.

	to the design of lighting in such a way that it avoids glare or dazzle to pilots and/or ATC and prevention of confusion with aeronautical lighting. Paragraph 2.10.158 of EN-3 states that 'while there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no significant evidence that glint and glare from solar farms results in significant impairment on aircraft safety'.	
20.2	At 2.10.102 EN-1 states that 'solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor'. The main likely impacts of glint and glare would be on nearby homes, motorist, public rights of way and aviation infrastructure.	This statement is acknowledged and noted by the Applicant.
20.3	Policy S53: Design and Amenity, sub-section 8 (d) sets out that development proposals 'should not result in harm to people's amenity either within the proposed development or neighbouring it through overlooking, overshadowing, loss of light or increase in artificial light or glare'.	This statement is acknowledged and noted by the Applicant.
20.4	Solar PV modules are specifically designed to absorb light rather than reflect it. Light reflecting from Solar PV modules results in the loss of energy output. Solar PV modules are dark in colour due to their antireflective coatings and are manufactured with low-iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors significantly	This statement is acknowledged and noted by the Applicant.

	increases electrical energy production of the panels and at the same time significantly reduces reflected rays.	
20.5	Chapter 13 of the ES addresses glint and glare. The assessment pertains to the possible impact upon key sensitive receptors comprising: • Motorists: driving on local roads • Railway line: effects on the train driver • Aerodromes in the area: pilots and air traffic control; and • Occupants of residential/commercial properties.	This statement is acknowledged and noted by the Applicant.
20.6	Embedded mitigation to reduce the glint and glare impacts, in the form of proposed new planting will help to screen the proposed development as is shown on the Landscape Strategy Plan (Figure 6.31). Currently, the combination of existing and proposed planting provides a high degree of screening around much of the solar array area. The choice of fixed panels and heights of the panel arrays are design decisions that affect the amount of glare possible at specific receptors. The use of anti-reflective coating on the panels reduces their reflective properties.	This statement is acknowledged and noted by the Applicant.
20.7	**Aviation activity:** the Applicant has assessed the impact on a number of RAF and private airfields. Overall, the assessment demonstrated that no significant adverse effects were identified.	This statement is acknowledged and noted by the Applicant.
20.8	**Railway Operations and Infrastructure:** Grantham to Skegness line runs through the 5km buffer area. Some glare was predicted at the railway line, but no yellow glare was detected. Screening from trees, hedgerows and the village of Heckington will prevent visibility to any glare expected from the railway. No significant adverse effects were identified.	This statement is acknowledged and noted by the Applicant.
20.9	**Road Safety:** numerous roads and country lanes are located within the 5km buffer area. The A17 is the only road	This statement is acknowledged and noted by the Applicant.

	in the study are where cars might be travelling at higher speeds. The model predicts yellow glare being visible along several of the roads. Of the 12 routes identified within the study area no significant adverse effects were identified due to limited visibility.	
20.10	Residential Properties: the ES assessed potential impact on 32 residential, 5 commercial and 2 church observational points. The receptors selected represented more than one property in the area. Further analysis was undertaken at 21 observational points. The results showed that no significant adverse effects were identified. Of the further analysis undertaken at those points, theoretical glint and glare periods of up to 5,945 minutes per property per year were estimated (i.e. 1.13% of the overall time) and generally during early morning periods of 04.30am to 06.00am or during the early evening between 18.00pm-19.30pm.	This statement is acknowledged and noted by the Applicant.
20.11	As no significant residual effects are predicted, no further mitigation for glint and glare is considered necessary in the ES.	This statement is acknowledged and noted by the Applicant.
20.12	The Council considers that the proposals would have a **neutral** impact in respect of glint and glare.	This statement is acknowledged and noted by the Applicant.
	Soils and Agricultural Land	
21.1	Paragraph 5.11.12 of EN-1 outlines that 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 (ALC)) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations'.	This statement is acknowledged and noted by the Applicant.
21.2	Paragraph 5.11.34 of EN-1 states that the decision maker should ensure that 'applicants do not site their scheme on	This statement is acknowledged and noted by the Applicant.

	the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land, the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'.	
21.3	Under the heading of 'Solar Photovoltaic Generation', paragraph 2.10.29 of EN-3 states that 'While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" (BMV) agricultural land where possible'.	This statement is acknowledged and noted by the Applicant.
21.4	Paragraph 2.10.30 notes that 'Whilst the development of ground mounted solar arrays is not prohibited on BMV agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 - 92 and 2.10.107 – 2.10.126'.	This statement is acknowledged and noted by the Applicant.
21.5	Paragraph 2.10.31 acknowledges that it is likely that applicants' developments may use some agricultural land, however that 'Applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land'.	This statement is acknowledged and noted by the Applicant.
21.6	Paragraph 3.10.32 states that where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be	This statement is acknowledged and noted by the Applicant.

	co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.	
21.7	Paragraph 3.10.145 of EN-3 reiterates that the SoS should take into account 'the economic and other benefits of the best and most versatile agricultural land' and that 'The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources'.	This statement is acknowledged and noted by the Applicant.
21.8	Under the sub-heading of 'Additional matters for solar based energy proposals', CLLP policy S14 'Renewable Energy' states that proposals for ground based photovoltaics and associated infrastructure, including commercial large scale proposals, will be under a presumption in favour (of approval) unless, amongst other things, 'the proposal is (following a site specific soil assessment) to take place on BMV agricultural land and does not meet the requirements of Policy S67'.	This statement is acknowledged and noted by the Applicant.
21.9	CLLP policy S67 'Best and Most Versatile Agricultural Land' states that significant development resulting in the loss of the best and most versatile agricultural land will only be supported if: The need is clearly established; The benefits outweigh the need to protect such land, when taking into account the economic and other benefits of the best and most versatile agricultural land; The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and Once the development has ceased its useful life then the land should be returned to its former use'.	This statement is acknowledged and noted by the Applicant.

21.10	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'*.	This statement is acknowledged and noted by the Applicant. A response has been provided within Examiners Written Questions 1 (LUS 1.1) on how the Proposed Development is in accordance with the Written Ministerial Statement (WMS) on Solar Infrastructure (15 MAY 2024). Specifically, to address the comment from NKDC, the following is provided: A cumulative impact assessment was undertaken as part of the assessment for **Chapter 14 Soils and Agricultural Land (APP-065),** and **Chapter 18 Cumulative Effects (APP-069)**. Within this, inter-cumulative effects for agricultural land have been assessed. The majority of the considered developments are solar developments where most of the land take is considered to be temporary and reversible, with the permanent land take limited to areas of built development. The inter-cumulative impact is deemed to be moderate and therefore is a significant impact, however, it should be noted that this is a temporary and reversible impact and land will retain its agricultural potential post restoration. In light of the above, it is considered that the Proposed Development accords with the aforementioned WMS.
21.11	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 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.	Appendix 2 Site Selection Report of the **Planning Statement (APP-277)** and **Chapter 3 Alternatives and Design Evolution (APP-054)**, outline agricultural land quality and seeking to minimise impacts on Best and Most Versatile (BMV) land, was a key consideration in the Applicant's site selection process. The Applicant identified that land close to the point of connection was typically subject to higher flood risks and/or higher agricultural land classification and sought land that was slightly more distant from the point of connection to minimise

		the extent of such land being used for solar generation. During the four-stage analysis, all of the alternative sites identified all presented similar or higher quantities of BMV in comparison to the Proposed Development. It is also important to recognise that while agricultural land classification (ALC) was an important consideration in site selection, it was one of several factors that were balanced to determine a favoured site. Given that the other sites identified by the Applicant during site selection displayed similar ALC qualities, this however was not a determining factor in the choice of site location. **Appendix 14.4 Outline Soil Management Plan (oSMP) (REP1-013 to REP1-014)** (pf which the provision of detailed versions is secured via Requirement 16 of Schudule 2 of the **Draft DCO (Document Ref: 3.1)**) provides measures that will ensure the protection of soil resources to enable reinstatement of agricultural land to its previous quality and use following decommissioning. Reinstatement of agricultural land to its previous quality will be a requirement within the detailed SMPs which are secured through requirement 16 in Schedule 2 to the **Draft DCO** states that: "*No part of the authorised development may commence until a soil management plan (which must be substantially in accordance with the outline soil management plan as relevant to construction activities) for that part has been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*".
21.12	The Council has appointed Landscope agricultural consultants to provide it with specialist advice on soils and agriculture. The full comments by Landscope are attached at Appendix D.	This statement is acknowledged and noted by the Applicant.

21.13	**Agricultural Land Classification:** the agricultural land surveyed represents a total of 529ha of Solar Array Area and 45ha of Bespoke Access Route Corridor. Landscope found that a detailed Agricultural Land Classification (ALC) survey has been undertaken by a professional team in agreement with Natural England and the results are considered reliable. The survey has informed the design of the development and the outline Soil Management Plan (oSMP).	This statement is acknowledged and noted by the Applicant.
21.14	The Cable Route Corridor has not been surveyed but the ES is based on higher grades of agricultural land (predominantly Grade 2 with some Grade 1 and Grade 3 land) and it would be unlikely that the impact would be worse after survey unless all the land is Grade 1 classification.	This statement is acknowledged and noted by the Applicant.
21.15	As shown in Table 14.13 of Chapter 14 of the ES, the predicted 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. Of this, 191ha will comprise BMV land (ES paragraph 14.6.2) and is considered to be a temporary loss due to the fixed lifespan of the development for 45 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.	This statement is acknowledged and noted by the Applicant.

	Bespoke Access Corridor: this comprises 45 ha of agricultural land. The provisional ALC data show that it is comprised entirely of Grade 3 agricultural land i.e. showing a predominantly moderate likelihood of BMV land (ES paragraph 14.5.9). The area that would be utilised during construction will be 18.91ha. Within the Bespoke Access Corridor, there will be a permanent loss of 3.42ha of BMV land and temporary loss of 12.94ha of BMV land during the construction of the access road. During the operational phase, the road together with associated drainage ditches and verges will cover an area of 4.42ha. This land is considered to be permanently 'sealed over' for the duration of the solar farm given that the Bespoke Access Corridor is stated as likely being retained for the operational duration of the development. 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 yet been surveyed but using provisional ALC data, it shows that 28.18ha would be Grade 1 and 145.73ha would be Grade 2 agricultural land i.e. showing a high and moderate BMV likelihood (ES paragraph 14.4.7). 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 around 2.70ha using the provisional ALC data approach.	
21.16	The amount of BMV land across the whole development likely to be permanently lost due to 'sealing over' as a result	This statement is acknowledged and noted by the Applicant.

	of the proposed development would therefore be in the region of 20.37ha. The total permanent loss of agricultural land (in general, across all 5 grades) would be 56ha. IEMA guidelines say that the permanent sealing of land above 20ha (including temporary development where there would be a reduction in soil quality) is a major adverse environmental impact. This threshold would be reached for the permanent 'sealing over' of land of BMV land assuming that the soil augering/sampling and subsequent ALC gradation has been carried out in line with industry standards, and it would also be reached for agricultural land across all grades. It is noted that paragraph 14.13.18 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 (23.31ha).	The statement, *"IEMA guidelines say that the permanent sealing of land above 20ha (including temporary development where there would be a reduction in soil quality) is a major adverse environmental impact"* by NKDC is only addressing the magnitude of the impact. The receptor sensitivity (in this case land quality) also needs to be taken into account to determine the overall significance of effect. If there are medium or low sensitivity in the receptors (Non-BMV) land then the significance of effect can be moderate. Clarification is required from NKDC on the following statement: *"The total permanent loss of agricultural land (in general, across all 5 grades) would be 56ha."* This value is not correct. The statement below provides a summary of what has been used for the assessment of loss of agricultural land within **Chapter 14 Soils and Agricultural Land (APP-065)**. The areas of permanent land take for the Proposed Development totals 29.99 ha across the Solar Array Area (23.31 ha), Cable Route Corridor (2.7 ha) and Bespoke Access Corridor (3.98 ha). This puts it above the 20 ha threshold for a high magnitude of impact. The estimates for the permanent land take are conservative worst case and include the access road at a width that is likely to be reduced, construction compounds that will be removed during the operational phase and access tracks that will be removed during operation or are already in place as part of the existing farm infrastructure. The values also include part of the substation extension area that has already been consented by Heckington Fen (2.4 ha). Accounting for this, only an additional 0.3 ha will be required for the Proposed Development's generation bay. The removal of these temporary design elements from the permanent land

		take values and the reduction in land for the substation extension could see the total land take of BMV land fall below the 20 ha threshold for high magnitude of impact. The Agricultural Land Classification (ALC) surveys and reporting followed the MAFF (1988) Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land and was conducted by suitably trained and experienced soil scientists. Strict methodology for surveying and data interpretation has been followed to ensure accurate reporting of ALC grades.
21.17	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.	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 the 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, the requirements of this restoration will be specified within the detailed SMP as stated in the oDEMP section 2.10: Soils and Agricultural Land, Mitigation Measures, **Appendix 2.5 Outline Decommissioning Environmental Management Plan (APP-078)**. 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. 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 Land Use Breakdown for the Proposed Development of the Site in Hectares within **Chapter 14 Soils and Agricultural Land (APP-065)**). Including the areas of green infrastructure in this

		case would result in overestimating the area temporarily removed from agricultural production.
21.18	Overall, Table 14.13 shows that the proposed development would lead to the loss of 493.27ha of agricultural land of which 277.3ha would be BMV land (56%). This can be broken down to 20.37ha permanent loss and 256.93ha temporary loss of BMV land (47%).	This statement is acknowledged and noted by the Applicant.
21.19	**Soil Management:** Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post-construction but not all and it is possible that long term drainage issues occur on the site due to the construction.	**Section 5 of Appendix 14.4 Outline Soil Management Plan (oSMP) (REP1-013 to REP1-014)** (secured via Requirement 16 of Schedule 2 of the Draft **DCO (Document Ref: 3.1)**) includes Stop Conditions that detail the measures that will be in place to prevent the handling and trafficking of wet and plastic soils. The Principal Contractor will be responsible for ensuring conformance with the **oSMP** and ongoing monitoring of the detailed SMP implementation will be carried out by both a Soil Scientist and Agricultural Liaison Officer (ALO). Daily checks that include field testing of soil conditions are a requirement of the oSMP.
21.20	The oSMP includes the cable route in order to minimise the impact on soil structure, land drainage and ultimately on soil quality. This is covered in ES paragraphs 14.4.19-20 and 14.6.8. Landscope advise that the reality is that contractors are under immense pressure to complete works in accordance with a work programme and will inevitably undertake works in substandard conditions in order to complete their contractual obligations.	This statement has been reviewed and is noted by the Applicant. It is considered that this statement is addressed by the response provided for 21.19, above.
21.21	Suitable soil management and restoration clauses would be needed in order to secure the land's quality at the end of the term. Whilst many of the damaging operations can be remedied using agricultural equipment, the layout of the panels and buried cables will often prohibit this during the	**Appendix 14.4 Outline Soil Management Plan (oSMP) (REP1-013 to REP1-014)** has been prepared in order to mitigate the effects on soil identified in **Chapter 14 Soils and Agricultural Land (APP-057)** of the ES as a result of the Proposed Development. Requirement 16(1) in Schedule 2 to

	life of the solar farm and as such remedies can only be completed at the end of term when all infrastructure has been removed. If the soil is in a substandard condition during the operation of the solar farm, carbon sequestration is reduced and infiltration of water can also be reduced, leading to localised standing water and the reduction in soil quality.	the **Draft DCO** states that "*No part of the authorised development may commence until a soil management plan (which must be substantially in accordance with the outline soil management plan as relevant to construction activities) for that part has been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities".* Requirement 16 also stipulates that detailed soil management plans must be submitted prior to the date of final commissioning (relating to the operational phase of the Proposed Development) and prior to the start of any decommissioning works for any part of the Proposed Development (relating to the decommissioning phase of the Proposed Development). These follow up plans must also be substantially in accordance with the **oSMP**. The mitigation set out in the **oSMP** is therefore secured by the **Draft DCO**. The **oSMP** provides measures that will ensure the protection of soil resources to enable reinstatement of agricultural land to its previous quality and use following decommissioning. Reinstatement of agricultural land to its previous quality will be a requirement within the detailed SMPs. These will be produced for approval by the LPA prior to construction commencing. The soil handling measures and stop conditions will ensure that soil quality is not impacted during the construction and operational phases. The oSMP includes Stop Conditions that detail the measures that will be in place to prevent the handling and trafficking of wet and plastic soils. These measures will ensure the soils will retain good structure

		and quality and only limited restoration will be required at the decommissioning phase to return the land to its previous quality and use.
21.22	There is a programme for decommissioning and re-instatement of the land. Whilst this is detailed and can be conditioned as part of a consent, even possibly with a s106 planning obligation, it remains to be seen whether it will be effective in leading to the land being returned to productive agriculture.	The Applicant notes this comment, and can confirm that the Decommissioning Environmental Management Plan or DEMP is secured via condition (termed a requirement in the DCO process), number 18 (requirement to produce a detailed DEMP prior to commencing decommissioning). There is also a requirement stipulating to produce a Soil Management Plan prior to decommissioning commencing (Requirement 16(5)) which must be substantially in accordance with the OSMP. The main commitment of the detailed SMP will be to ensure the protection of soil resources, through site specific soil handling measures, to enable reinstatement of agricultural land to its previous quality and use following decommissioning. The detailed SMP will utilise baseline soil data obtained from the detailed ALC surveys **(Appendix 14.2 ALC Report 2023 APP176/Appendix 14.3 ALC Report Beacon Fen Construction Access Track 2024 APP-175)** (Cable Route Corridor Survey to be carried out pre-construction) to ensure soils are reinstated to their baseline condition. Breach of a requirement of a DCO is a criminal offence pursuant to section 161 of the Planning Act 2008. Therefore, if the undertaker were to fail to decommission the Proposed Development or decommission the Project without preparing, submitting and obtaining the approval of the detailed SMP and DEMP in accordance with requirements 16 and 19

		respectively, this would amount to an offence, which is considered to be a sufficient deterrent to ensure compliance.
21.23	With reference to cumulative impacts at a District and County Level, the Council considers that the scale of the project and the amount of BMV land impacted, makes the impact significant at both District and County level. The ES argues that the area amounts to only 1% of the farmed area of Lincolnshire, however, the cumulative effect is assessed by the Council as being significant for both the District and across Lincolnshire. There are several other large solar schemes approved or proposed across the wider area that contribute to this impact.	A cumulative impact assessment for soil and agricultural land was carried out (in accordance with the scope detailed within **Chapter 4 Scope and Methodology (APP-055)** and utilising **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) as part of the assessment detailed within **Chapter 14 Soils and Agricultural Land (APP-065)** and **Chapter 18 Cumulative Effects (APP-069) of the Environmental Statement (ES)**. Inter-cumulative effects for the agricultural land have been assessed. When considering the impact of all considered developments (within **Chapter 14 Soils and Agricultural Land**) across the Lincolnshire County Council administrative area, 2% (11,962.85 ha) of all the agricultural land is involved of which 0.82% is (4,927 ha) BMV land. The majority of the considered developments are solar developments where most of the land take may be considered temporary and reversible, with the permanent land take limited to areas of built development. Assuming that embedded mitigation allow for reinstating these sites to agricultural production and that the soil resources are protected during all phases of the developments, the inter-cumulative impact is deemed to be moderate and, therefore, Significant. It is considered that a robust and proportionate inter-cumulative assessment has been undertaken.
21.24	For a project of this scale, there is an impact as the development will tie up the land for up to 45 years. The loss of such a large area of land would normally be considered significant at District level, even though the majority of the use by area is 'temporary' and reversible. Any permanent	This statement is acknowledged and noted by the Applicant.

	loss of land due to construction or through biodiversity enhancements may affect this assessment.	
21.25	The ES acknowledges that the broader loss of agricultural land for built development within the development would be a Major Adverse impact. However, there are 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.	This statement has been reviewed and is noted by the Applicant. It is considered that this statement is addressed by the response provided for 21.17, above.
21.26	As above, other NSIP projects (such as the Springwell Solar Farm) have assessed that certain element 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.	This statement has been reviewed and is noted by the Applicant. It is considered that this statement is addressed by the response provided for 21.17, above.
21.27	Across Lincolnshire, the estimated proportion of BMV is 71.2% while across North Kesteven the proportion of BMV is 67%, slightly lower than the Lincolnshire average. This still covers two-thirds of agricultural land and is well above the national average. The table of effects in ES Chapter 14 indicates that on a site specific level there will be a loss of 529ha of agricultural land associated with the Beacon Fen main solar array, of which 250ha will be BMV land – and as above comprised of areas of BMV which are variously classed as either temporary/reversible or where 'sealing over' is assumed.	This statement is acknowledged and noted by the Applicant.
21.28	The amount of BMV land lost on a permanent basis to green infrastructure is significant while the loss of BMV land	This point is acknowledged, however, it should be noted that the cessation of intensive farm management at (the Solar

	on a temporary basis through 'sealing' the land under hardstanding is also considered to be significant in terms of its environmental impact (exceeding the 20ha IEMA guidance threshold) especially given the 45-year lifespan of the solar farm. The site is currently productive farmland which will be removed from mainly arable farming for 40 years at best and a lower intensity grass-based system will replace it.	Array Area of) the Proposed Development is only temporary (albeit long term). Through implementation of the detailed SMP(s), substantially in accordance with **Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013 to REP1-014)**, the soil resource across the Proposed Development will be protected through the implementation of site specific soil handling measures that will enable the previous land use to be reinstated upon decommissioning. The lower intensity grass based system provides additional benefits to the soils within the Site, As stated in paragraph 14.7.18 of **Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES) "*The soils will provide other ecosystem services during the operational phase including for biodiversity and carbon storage due to the lower intensity land management strategies that will be adopted during operation"* This allows the soils to remain functional over the 40-year operation phase and soil quality within these areas may in fact be improved in terms of organic matter content (carbon storage) resulting in positive effects on soil quality indicators, allowing for the agricultural potential to be retained. This will help secure increased future cropping potential and value of the fields.
21.29	Finally, as confirmed in the ES there is no current commitment to mitigation by grazing. The ES does not assume that grazing under the solar panels will be provided, instead it takes a worst case scenario where the land is removed from agricultural production during the operational phase (paragraph 14.7.18). The applicant advises that whilst the land within the Solar Array Area may be available for grazing during the operational phase, however, this has not been confirmed at this stage. The	This statement is acknowledged and noted by the Applicant.

	applicant therefore confirms that their assessment is 'based on a "worst case" assessment that approximately 529 ha of land within the Solar Array Area remains out of agricultural production for the duration of the operational phase'.	
21.30	The oSMP, however, includes guidance on how grazing could be incorporated into the operational phase to maintain agricultural production whilst also providing biodiversity benefits. The applicant has based the guidance on the BRE (2014) guidance document and the Solar Energy UK (2022) good-practice document.	This statement is acknowledged and noted by the Applicant.
21.31	As there is no guarantee of grazing as a means of managing the grassland below the solar panels, there will be a significant loss of agricultural land for 40 years as a result of the solar farm and the contribution that agriculture makes towards economic activity within North Kesteven and more widely across the County. The latter is recognised in paragraph 187(b) of the NPPF. The provision of conservation grazing beneath the solar panels would offer some continuation of agricultural use on the agricultural land including BMV land. The Council's position is that it should be provided in line with best practice guidance by BRE (2014) 'Agricultural Good Practice Guidance for Solar Farms'.	During the operational life of the Proposed Development, the possibility of co-utilising (the Solar Array Area of) the Proposed Development for grazing (thereby allowing some agricultural use) will be investigated by the Applicant and the viability of this will be determined at the detailed design stage. This would depend on a number of factors beyond the Applicant's control such as nearby existing livestock farming enterprises/tenancies, and whether they hold interest in tenanting further land and for how long.
21.32	The Council considers that a Requirement to ensure that conservation grazing is provided would give more certainty that the land could continue in agricultural use both during operation and at the end of the decommissioning. A further option to enhance the value of the land while not in agricultural production would be planting to help with nitrification (e.g. non-edible legumes such as vetches).	As per the statement above, during the operational life of the Proposed Development, the possibility of co-utilising (the Solar Array Area of) the Site for grazing (thereby allowing some agricultural use) will be investigated by the Applicant and the viability of this will be determined at the detailed design stage.
21.33	The Council therefore concludes that the loss of arable production is locally significant and in view of other projects	This statement is acknowledged and noted by the Applicant.

	in the wider District and County, potentially cumulatively significant. The loss of BMV agricultural land is considered to be a **negative** impact and where is it noted that scope for mitigation by grazing has not yet been committed to.	
	Socio-Economics	
22.1	Paragraph 5.13.9 of EN-1 states that the decision maker 'should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the IPC considers to be both relevant and important to its decision'. EN-1 goes on to say the decision maker 'should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development'.	This statement is acknowledged and noted by the Applicant; no further response required.
22.2	EN-1 makes reference to an extended list of potential impacts to consider as relevant, including (at paragraph 5.13.4) creation of jobs and training opportunities, contribution to low-carbon industries, provision of additional local services and improvements to local infrastructure, any indirect beneficial impacts for the region, effects on tourism, impact of a changing influx of workers, and cumulative effects.	**ES Chapter 15 Socio-economics (APP-066)**, considers effects listed in section 5.13 of the NPS EN-1. Paragraphs 15.6.1 to 15.6.14 of **ES Chapter 15 (APP-066)** asses the effect of job creation and GVA during construction. Regarding local services and education, paragraph 15.5.38 acknowledges North Kesteven District Council's (NKDC) wish to organise school visits to the Proposed Development. Local supply chain opportunities are explored in **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)**, aiming to enhance local services and opportunities and secured via Schedule 2 Requirement 17 of the **Draft Development Consent Order (Document Ref: 3.1)**. Effects on tourism during construction are discussed in paragraphs 15.6.47 to 15.6.50 of **ES Chapter 15 Socio-economics (APP-066).**

		Changing influx of workers in discussed in ES **Chapter 15 Socio-economics (APP-066)**. Impact from influx of workers is discussed in paragraphs 15.6.37 to 5.6.39 for construction, and paragraph 15.6.71 during operations. It is expected influx impacts during decommissioning will be similar to those during construction. Cumulative effects for the Proposed Development are considered in Section 15.8 of **ES Chapter 15 Socio-economics (APP-066)** and Chapter 18 Cumulative Effects (APP-069).
22.3	Furthermore, EN-1 also makes reference to the need to consider development of accommodation strategies, if appropriate, to address any potential impacts during the construction and decommissioning phases. In addition, it also refers to the potential for the SoS to require the approval of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, and additionally consideration of solar and potential for associated socio-economic effects is referenced in respect of the potential for socio-economic benefits of the site infrastructure being retained after the operational life of solar photovoltaic generation.	**ES Chapter 15 Socio-economics (APP-066)** considers the effect of worker influx on accommodation and proposes such mitigation measures as collaboration with North Kesteven District Council's (NKDC) to understand up to date accommodation demands and suggest alternative accommodation to workers if necessary (see Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**). The Applicant also commits to the monitoring of accommodation capacity during peak construction months. **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179),** secured via Schedule 2 Requirement 17 of the **Draft DCO (Document Ref: 3.1)** has been developed, and its implementation will be carried out in agreement with local authorities. The Applicant retains an option to keep the roadways comprised within the Bespoke Access Road after

		decommissioning, depending on landowner preferences. Should landowners assess that the Bespoke Access Road would benefit to their farming enterprise (e.g. improving ease of moving machinery between fields or sharing machinery between farming enterprises), the roadways and gates/fences will be retained in whole or part. The Applicant assumed that no other infrastructure of the Proposed Development would bring socio-economic benefits after the operational stage.
22.4	CLLP policy S10 'Supporting a Circular Economy' recognises the high energy and material use consumed on a daily basis, and, consequently, is fully supportive of the principles of a circular economy. As such, proposals will be supported, in principle, which demonstrate their compatibility with, or the furthering of, a strong circular economy in the local area.	This comment is noted, no additional response is required.
22.5	CLLP policy S20 'Resilient and Adaptable Design' requires design proposals to be adaptable to future social, economic, technological and environmental requirements in order to make buildings both fit for purpose in the long term and to minimise future resource consumption.	The Proposed Development is an excellent example of a forward-looking infrastructure, contributing to the nation's pathway to net zero. Moreover, the change of land use from intensive agricultural use to grassland and wetland habitat, detailed in **Chapter 7 Ecology (Document Ref: 6.2 ES Volume 1: 6.2.7)** of the Environmental Statement (ES) and the **Outline Landscape and Ecological Management Plan (OLEMP) (APP-089)** (secured via Schedule 2 Requirement 7 of the **Draft DCO (Document Ref: 3.1)**) will create benefits for biodiversity, promoting future sustainability.
22.6	CLLP policy S28 'Spatial Strategy for Employment' requires employment related proposals to be consistent with meeting the overall spatial strategy for employment. The strategy is to strengthen the Central Lincolnshire economy offering a wide range of employment opportunities focused mainly in and around the Lincoln urban area and the towns	Local supply chain opportunities are discussed in **Appendix 15.3 Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)**, aiming to enhance local services and opportunities, including opportunities in Sleaford. This is

	of Gainsborough and Sleaford, with proportionate employment provision further down the Settlement Hierarchy.	secured via Schedule 2 Requirement 7 of the **Draft DCO (Document Ref: 3.1).**
22.7	The preface to the CLLP 'employment' policies notes at paragraph 5.1.2 that Central Lincolnshire is located within the Greater Lincolnshire Local Enterprise Partnership (GLLEP) area and represents roughly 30% of the GLLEP area's population, employment and business base. Greater Lincolnshire has an economy of £20.7bn with an ambition to grow the Gross Value Added (GVA) by £3.2bn by 2030, and boasts a mix of traditional manufacturing, a comprehensive agri-food sector, energy and services, and is strong in health and care and the visitor economy.	Gross Value Added (GVA) has been included as part of the baseline information within **Chapter 15 Socio-economics (APP-066**) of the Environmental Statement (ES). This is focussed on more localised GVA to North Kesteven District Council's (NKDC) as well as GVA provided by certain industries (see paragraphs 15.5.11 to 15.5.15 within Chapter 15). The figures provided for GLLEP are from 2019 as part of the Greater Lincolnshire Local Enterprise Partnership (GLLEP) Local Industrial Strategy, which are likely to be outdated and have, therefore, not been included within the baseline. In addition, Chapter 15 provides a calculation of GVA as part of the assessment, with regards to construction workers. This has been included within Table 15.14 Calculations of GVA from construction workers per AoI and is described in paragraphs 15.6.10 to 15.6.14.
22.8	The ES states that the net number of additional construction jobs associated with Beacon Fen Energy Park is estimated to be around 373 full time equivalent jobs per year within the North Kesteven District area and 44 full time equivalent jobs within a 60-minute travel area from the site. The operation phase (including maintenance) of Beacon Fen Energy Park is estimated to create 4-5 net full time equivalent jobs in North Kesteven District Area and 8-9 within a 60-minute travel area from the site.	This statement has been reviewed and is noted by the Applicant. This information is from **Chapter 15 Socio-economics (APP-066)** of the ES and no further response is required.
22.9	By way of additional mitigation and enhancement measures, to help maximise the positive gain for the local economy from the beneficial effect arising from	This statement has been reviewed and is noted by the Applicant and no further response is required.

	employment generation during the construction, operational (including maintenance) and decommissioning phase, an outline Employment, Skills and Supply Chain Plan (ESSCP) has been submitted and would be provided under draft DCO Requirement 17. As described in paragraph 15.7.2, the plan is proposed to include measures such as: Prioritising local employment Reskilling of temporary farm workers to avoid economic displacement or support in finding alternative agricultural work Reskilling of workers after the operational phase Potential upskilling of local residents through apprenticeships	
22.10	The production of the outline Employment, Skills and Supply Chain Plan (ESSCP) is seen to be critical to minimise some of the adverse impacts of the solar farm, particularly given that numerous NSIP solar farms are consented or planned within the District (Heckington Fen, Beacon Fen, Fosse Green and Leoda with others to follow) and more within the wider Lincolnshire county. The Council will raise further points regarding the outline ESSCP in its Written Representations.	This statement has been reviewed and is noted by the Applicant. Consideration will be given in response to the Written Representation.
22.11	The Council considers that the outline ESSCP requires a financial contribution to enable its delivery. The relatively recently consented Longfield and Heckington Fen DCOs were subject to s106 Agreements which provide for a £50,000 index-linked payment per annum (in the case of the latter) for increasing employment, education and skills opportunities in the local areas for individuals in the renewable energy, sustainable farming/agricultural diversification, ecology and sustainable development	The Applicant sets out its current position in regards S106 and requests for S106 from HLAs, in response to the Examining Authority's written question GCT.1.11. The Applicant's Responses to the ExAs ExQ1 document is submitted at the same deadline and has the document reference 9.6.

	sector and which may include the provision of training and apprenticeships and education bursary payments.	
22.12	The Council broadly agrees with the assessment provided in the ES Chapter on Socio Economic effects. It is agreed that the economic impact of the construction phases in terms of direct employment will be minimal and that the jobs created will be temporary, the majority imported due to low levels of unemployment in North Kesteven albeit a proportion may come from Boston as suggested.	This statement has been reviewed and is noted by the Applicant; no further response is required.
22.13	The cumulative impacts of a number of NSIP and other TCPA solar projects is of concern. Tourism is a key growth sector for the District and a significant net contributor to the local economy worth £201m and growing just over 5% in 2023. One of the Council's Tourism Strategy's aims is to continue to increase the length of visitor stay and thereby expenditure, while at the same time reducing emissions by cutting the volume of day trips. In order for this goal to be achieved there is a need to increase the volume of serviced accommodation in the District, which both STEAM (a tourism economic modelling tool) and the Council's own recent Hotel Study (2024) show are insufficient to meet current, let alone future, levels of demand. There are shortages at key times of the year.	The Applicant acknowledges the growing importance of tourism to the local economy. Within the assessment to inform **ES Chapter 15 Socio-economics (APP-066)**, the baseline information on tourism was carefully collected through desktop research and interviews with local inhabitants and the Economic Development Manager of North Kesteven District Council's (NKDC) (see paragraph 15.4.7 of **Chapter 15**). It was noted during the NKDC interview that visitor economy is an important council priority, which is acknowledged in paragraph 15.5.36 and a full assessment of the Proposed Development on tourism is presented in paragraphs 15.6.47 to 15.6.50, taking into account impacts from increased traffic, increased demand on accommodation and landscape and visual effects. Response to accommodation demand is included, below.
22.14	The cumulative impacts of a number of large scale NSIP developments on the availability of serviced visitor accommodation across the District is a cause for concern. Any upside in construction worker spend will potentially be cancelled out by loss of visitor numbers and therefore visitor spend in the District with additional direct impacts on visitor attractions.	The Applicant acknowledges the concern and the assessment in **ES Chapter 15 Socio-economics (APP-066)** has given thorough consideration to the inter-cumulative impacts of a number of large scale Nationally Significant Infrastructure Project (NSIP) developments on the availability of accommodation. The assessment presents a worst-case scenario where all construction schedules of NSIPs overlap.

		In practice, it is considered unlikely that all projects will be constructed at the same time, and peak months will vary across projects. Disclosure of the construction schedule, mentioned in **ES Chapter 15 (APP-066)**, can give a chance for different projects to co-ordinate and avoid the overlap of peak construction months. Accommodation stress will be naturally spread across several counties for different NSIPs, this will be enhanced by the Applicant's collaboration with NKDC authorities to monitor demand and accommodate workers in districts with less accommodation demand during peak construction months. Finally, successful implementation of the **Outline Skills, Supply Chain and Employment Plan (APP-179)** will likely reduce demand for accommodation thanks to increased local hiring. This is secured via Schedule 2 Requirement 17 of the **Draft DCO (Document Ref: 3.1)**. Direct impacts on visitor attractions have been considered in **ES Chapter 15 Socio-economics (APP-066)** and main touristic attractions have been found to be the Heckington Windmill, the Heckington Village Show and the Swaton Vintage Show. As presented in **ES Chapter 15 (APP-066)**, there will be negligible (Not Significant) impact from construction traffic on the Heckington Village Show and Swaton Vintage Show.
22.15	The cumulative impacts of a large number of NSIP developments over a prolonged period on the visitor economy, PROW network, access to the countryside, walking and cycling activities etc will need to be monitored. The Council regularly monitors the footfall on the Stepping Out Network while visitor numbers are captured by STEAM. While there may be some local displacement in the short-term, longer-term impacts on the attractiveness of	The Public right of Way (PRoW) network will not be significantly affected. Temporary closures lasting for up to a week are planned for four footpaths. As detailed within **Chapter 6 Landscape and Visuals (APP-057**) of the Environmental Statement (ES), visual impacts on PRoW included in the Stepping Out Initiative Route, the Heckington Walk (Heck/2/4 and Heck/12/1 will be Not

	significantly changed rural landscapes to visitors will need to be captured.	Significant during the operation phase of the Proposed Development. Potential impacts on non-motorised road users such as cyclists and horse-riders are assessed in **Chapter 15 Socio-economics (APP-066).** The assessment found no significant effect on the safety or amenity of cyclists and equestrians. While cumulatively, it is difficult to predict tourist preferences and behaviours with multiple energy parks being developed in NKDC and Lincolnshire, it is worth mentioning a perception study undertaken by The South West Research Company in 2013 on the Impact of Renewable Energy Farms on Visitors to Cornwall. While the perceptions might have changed since 2013, it is important to highlight that 80% of visitors surveyed had positive attitudes towards renewable energy parks, with just 6% having negative attitudes towards them. Overall, the report indicates that only 2% of visitors were less inclined to return to the county due to the presence of wind and solar farms. In contrast, 4% were more likely to visit, possibly reflecting the appeal of these developments to some individuals and, more significantly, the perception that the county was taking positive steps by embracing renewable energy and supporting environmental initiatives
22.16	The Council has further key areas of concern for the local economy, specifically: **The cumulative impact of land take on the Agri food sector locally both in terms of Food Security and land use:** It is possible that a significant proportion of land in the District (up to 10% of the total area of NK - roughly 100,000ha) will be given over to NSIP solar energy production. Agriculture accounts for 90% of land use in the	This commented is noted and the Applicant fully acknowledges the need for the protection of the agricultural supply chain and national food security. The Statement made on 15th of May 2024 by the Secretary of State for Energy Security and Net Zero summarises the importance of a balance between protecting agricultural land while still

	District and so the impact will be proportionately greater. Impacts on the agri-food sector and its supply chains are considered relevant here. The de facto replacement of agricultural production with energy generation may have far-reaching impacts on the local economy, GVA, skills, future land values as well as more generally countywide in the construction and agri-food sectors. The move towards the 'monetisation' of the environment and biodiversity suggested by subsidy regimes and Biodiversity Net Gain legislation will allow the value of land and its potential outputs to be measured in different ways. Solar energy generation (in lieu of agricultural production) to drive profitability, productivity, or resilience both alongside and instead of primary agricultural production should therefore be considered. Aggregating direct economic benefits: North Kesteven has a nationally significant role in feeding and defending the nation. In the future, mindful of the number of projects being proposed, it may have a similarly significant role in powering the nation. The value of the electricity produced could be of considerable direct economic benefit over time to impacted businesses and communities, the wider District and Greater Lincolnshire. Given that the Council is concerned with measuring the cumulative impacts of NSIP developments, it is logical to explore the case for aggregating the cumulative financial benefits of a large number of such schemes in order to assess the potential to contribute to strategic economic and socio-economic goals, particularly in respect of green infrastructure growth, carbon reduction and the building of green capital in the rural economy.	pursuing energy security, recently threatened by geopolitical changes. During the Scoping phase, effects to the agricultural, energy and construction supply chains were not scoped in (**Appendix 1.1 Scoping Report (APP-071)**). However, an assessment of net Gross Value Added (GVA) from the Proposed Development through construction workers was undertaken, taking into account direct loses of agricultural jobs. This has been included within Table 15.14 and is described in paragraphs 15.6.10 to 15.6.14 in **Chapter 15 Socio Economics (APP-066)** of the Environmental Statement (ES). It should be noted that the Proposed Development will likely have a positive effect on the Solar PV, Energy and Construction supply chains, as evidenced through the calculation of a GVA gain through the creation of construction jobs. Further, the Applicant is considering the option to open the Proposed Development for grazing opportunities. In that way, the Proposed Development could still contribute to the agricultural supply chain if a local grazier was interested in this opportunity. This opportunity is described in the **Outline Landscape and Ecological Management Plan (OLEMP) (APP-089)**, secured via Requirement 7 of Schedule 2 of the **Draft DCO (Document Ref: 3.1)**. The acknowledgement of the cumulative financial benefits, and secondary positive effects, of developing Nationally Significant Infrastructure Projects (NSIP) is noted and the Applicant agrees with this. In regard to the staggered decommissioning of Solar PV, the comment and concern is noted and it is agreed that this should

	Future Energy needs: Solar Farms have a lifespan of 25-40 years. This raises questions about how decommissioning could be staggered across the Grid and how energy produced will be replaced if output is to be maintained and what will the land take be in 40-100 years' time given that energy demands are likely to increase.	be considered closer to the point of decommissioning. The national benefits of the Proposed Development over its forty year operational life to the urgent need for low carbon electricity have been set out in the application. It is considered an appropriate operational lifetime. It is clearly possible to speculate on numerous future energy demand and supply scenarios but making a 25 or a 40-year prediction is not possible. Technology, population and the nature of demand, to name a few examples, will also evolve in ways which are difficult to predict. The evolution of the grid will continue well into the future and adjustments will be made a numerous points in the future that impact the composition of our energy supply. These are not matters that this application can address.
22.17	Finally, the Council considers that the temporary closure of several footpaths during construction will adversely impact on the use of the PROW network generally and the use of the Heckington Fen Stepping Out walk, which utilises footpath Heck/12/1. .	As per **Chapter 15 Socio-economics (APP-066)** of the Environmental Statement (ES),with the embedded mitigation detailed within **Appendix 2.3 Embedded Mitigation (APP-076)** (secured through the **Draft DCO (Document Ref: 3.1)**) in place, the Public Right of Way (PRoW) network will not be significantly affected by closures. Temporary closures lasting for up to one week are planned for four footpaths (including the Stepping Out Walk Heck/12/1 and Heck/2/4) and will be carried out in stages, meaning that only one footpath will be closed or diverted at a time. The closure of footpath Heck/14/1 and Heck/2/4, and any closure of footpaths crossing the Cable Route, will be managed through sharing information in advance with relevant authorities and PRoW users, introducing signage approaching the construction Site and the PRoW, onsite speed limit for construction traffic, driver training, physically defined

		boundaries to Cable Route works and nominated look out person, and restoration of ground conditions along the PRoW following construction. Further detail and mitigation measures will be provided in the **Outline Public Rights of Way Management Plan (Document Ref: 9.5)**, which is being submitted at Deadline 2.
22.18	In conjunction with the cumulative impacts on footpaths across North Kesteven from other large scale solar farm developments, the Council considers that there is potential for the change in the landscape from predominantly agricultural to solar energy generation which will have an unforeseen effect on the attractiveness of the District for walking and hence on the tourism economy, as well as the health of local residents.	Regarding visual impacts, **Chapter 6 Landscape and Visual (APP-057)** records that no significant effects will be experienced within defined settlements as a whole, although significant effects will be experienced by a limited number of residential receptors, users of the PRoW and minor road network in close proximity to the Proposed Development. Following the establishment of the mitigation planting (as illustrated upon **Figure 6.31 Landscape Strategy Plan (APP-233 to APP-235)** and detailed within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** (secured through the **Draft DCO (Document Ref: 3.1)**), the extent and number of receptors experiencing significant effects will be further reduced. The effects of mitigation planting in relation to close distance views are illustrated in the photomontages from Ferry Lane, **Figure 6.27a, b and c (APP-229)** and Halfpenny Toll Lane near Ewerby Thorpe (Farm), **Figure 6.29a, b and c (APP-231)**. Finally, a robust assessment of cumulative visual and landscape impacts has been carried out in **Chapter 6 Landscape and Visual (APP-057)** and no significant adverse cumulative landscape and visual effects were identified. With no significant cumulative impacts on landscape and visual

		effect, it is highly unlikely that touristic attractiveness of the area will reduce and further impact the tourism economy. Owing to the aforementioned Not Significant effects as a result of temporary closures of PRoW and lack of significant cumulative landscape and visual effects, it can be concluded that use of the existing PRoW network, and hence the physical health of those users, will be maintained. A health screening exercise was undertaken in accordance with the Central Lincolnshire Healthy Planning Checklist, and included within **Appendix 1.1 Scoping Report (APP-071)**. This considered potential impacts on mental health due to stress from construction and decommissioning activities, including increased noise and traffic. Chapter 15 Socio-Economics (APP-066) provides baseline data on community health and wellbeing, and further considers related impacts including restricted access to recreation, and increased exposure to noise and traffic. Table 15.3 Social Receptor sensitivity Scale confirms that the potential impact on the wellbeing of people has been considered when defining the magnitude of change.
22.19	The provision of an extension to footpath Ewer/12/1 which will run through the Solar Array Area is welcomed as it offers the potential to link with existing PROWs to the north of the site along the River Slea to create a circular walking loop. The Council recommends that the potential to create a new Stepping Out Walks route is explored during the Examination as there is a lack of these routes within this part of the District, with the Heckington Fen route being the only route in place. The Stepping Out Walks are a well-used resource by the local community for exercise and public health purposes. They also form an important part of the	Comment noted. The Applicant is familiar with Stepping Out Walks and considers the existing Heckington Walk in the assessment of recreation in **Chapter 15 Socio-economics (APP-066)**. The applicant proposes to submit plans to show a circular route, secured through the enhancement of footpath Ewer/12/1, and commits to providing signage to raise awareness of the route The circular route will be included in Stepping Out Walks library with a PDF route map. The applicant also commits to design, erect and maintain suitable signage of the route.

	Council's tourism offer for easy leisure walking within the District as described in the Council's Tourism Strategy. The walks are well publicised via the website: Stepping Out - Hill Holt Wood and via the AllTrails app. The Council actively monitors their usage via footfall counters with usage statistics provided on a monthly basis. The quarterly and annual monitoring reports demonstrate their popularity. The creation of a designated Stepping Out Walk would require the provision of a small car park, bins, signage along the route, footfall counters and creation of a pdf route map for publication on the Stepping Out Walks and AllTrails website.	The Applicant also would refer to the Applicant's response to question G T.1.11 within the Applicants Response to ExAs ExQ1 (Document Reference 9.6) submitted at this deadline.
22.2018	Given the commitment to improving skills, employment and the local supply chain and provision of a new permissive path but potential adverse cumulative impacts on the tourism economy and visitor accommodation, the Council considers the impacts on socio-economics to be **neutral**.	This comment has been reviewed and is noted by the Applicant, responses to comments on the tourism economy and visitor accommodation are included above; no response is required.
	Air Quality	
23.1	Paragraph 5.2.9 of EN-1 states that the decision maker 'should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area or leads to a new area where air quality breaches any national air quality limits.' In all cases the decision maker must take account of any relevant statutory air quality limits.	This statement is acknowledged and noted by the Applicant; no further response required.
23.2	The UK Air Quality Strategy (AQS) identifies nine ambient air pollutants that have the potential to cause harm to human health and two for the protection of vegetation and ecosystems. The AQS defines objectives for these pollutants that aim to reduce the impacts of these pollutants	This statement is acknowledged and noted by the Applicant; no further response required.

	to negligible levels. The objectives are not mandatory but rather targets that local authorities should try to achieve.	
23.3	CLLP Policy S14 'Renewable Energy' states that whilst renewable energy scheme will be supported, this is subject to an assessment as to whether the impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters including dust and air quality.	This statement is acknowledged and noted by the Applicant; no further response required.
23.4	CLLP Policy S53 'Design and Amenity' requires that all development will not result in adverse noise and vibration taking into account surrounding uses nor result in adverse impacts upon air quality from odour, fumes, smoke, dust and other sources.	This statement is acknowledged and noted by the Applicant; no further response required.
23.5	The quality of the air at the site is generally good, based on the review of North Kesteven District Council air quality monitoring data, and there is not a designated Air Quality Management Area declared within the District.	This statement is acknowledged and noted by the Applicant; no further response required.
23.6	The NKDC Air Quality Strategy 2024 to 2029 confirms that historically, air quality within North Kesteven has complied with the AQS objectives, with no exceedances of the NO2 annual mean reported in the last five years. Therefore, due to this consistent compliance, no AQMA's have been declared and no AQAP has been published. The Strategy does however confirm the Council's commitment to taking actions that improve air quality to further reduce, and mitigate, pollution concentrations to ensure that no exceedances arise within the District in the future. Therefore, impacts of road traffic emissions associated with the construction phase following the implementation of mitigation measures are expected to be not significant. No additional mitigation is proposed for construction or operation phase traffic generation.	This statement is acknowledged and noted by the Applicant; no further response required.

23.7	The ES states at paragraph 16.7.4 that Beacon Fen Energy Park will incorporate a range of site-specific dust mitigation measures during construction which will be implemented via a Dust Management Plan and/or as part of the oCEMP. No specific requirements for mitigation in the operational phase have been identified.	This statement is acknowledged and noted by the Applicant; no further response required.
23.8	Any effects on air quality experienced during decommissioning will be controlled through the implementation of mitigation measures, which are detailed in and secured by the Outline Decommissioning Environmental Management Plan.	This statement is acknowledged and noted by the Applicant; no further response required.
23.9	The Council's position is that there are no positive construction, operation and decommissioning impacts in relation to air quality and that overall, the construction and operational impacts are **neutral**.	North Kesteven District Council's Local Impact Report (LIR) is in agreement with the conclusions and recommendations of **Chapter 16 Air Quality (APP-067)** and it is considered that no further input is required to respond.
	Other Environmental Topics	
24.1	ES Chapter 17 over other topics including Arboriculture, Ground Conditions, Waste, Major Accidents and Disasters, Utilities Telecommunications and Television Reception, Human Health, Electromagnetic Fields (EMF) and the Health and Safety Executive (HSE). These topics were agreed not to be included as individual chapters but which warranted further consideration or a standalone assessment.	This statement has been reviewed and it is noted. It is acknowledged that the Council identifies the environmental topics that were agreed not to require standalone chapters within the Environmental Statement (ES), but which were, instead, considered within **Chapter 17 Other Environmental Topics (APP-068)**.
24.2	**Arboriculture**: 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	There will be no impacts to the six veteran trees located within and adjacent to the Bespoke Access Corridor. This is why they are not listed in Table 9 of **Appendix 6.6 Arboricultural Impact Assessment (APP-088)**, which only details

	to increased usage of the access track for construction purposes e.g. 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 not referred to in Table 9 of the AIA) they would not be impacted by any construction works.	arboricultural impacts arising from the Bespoke Access Corridor development. Two of the veteran trees are located outside of the DCO Order Limits and their crowns, root protection areas (RPA) and veteran buffer zones fall within the Bespoke Access Corridor DCO Order Limits. The remaining four veteran trees are located within or on the DCO Order Limit boundary for the Bespoke Access Corridor, which has been designed to avoid impacts to these four veteran trees. These four veteran trees are to be retained and will be fully protected during the Bespoke Access Corridor construction. Only one potential impact was identified for veteran trees within the Solar Array Area in **Appendix 6.6 Arboricultural Impact Assessment (APP-088),** which is the installation of site fencing within the buffer zone of this tree. The **Appendix 6.6 Arboricultural Impact Assessment (APP-088)** states "*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 Construction Environmental Management Plan (CMEP)"*. The CEMP is to be secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1**).

		With regards to T1124, which is within the proposed Cable Route Corridor, this 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. This 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* (within the 2006 guidance) *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 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". As stated, the aforementioned 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. 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. It should be noted that 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. Furthermore, **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 (REP1-009 to REP1-010)** secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**.
24.3	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.	**Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** details at 6.6.8 that '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' and that 'key proposed mitigation measures are anticipated to be further refined during the detailed design stage of the Proposed Development'. Individually ash trees and any tree groups where a majority of the trees in the group are comprised of ash, that substantially decline due to ash dieback disease to the extent that they have to be removed on health safety grounds and those that die in their entirety will be replaced during the timeframe of 20 years from commissioning of the Solar Array PV and BESS infrastructure. The LEMP can include this requirement, when it is produced at the detailed design stage. Ash trees that die that are located within the four woodland blocks within the Solar Array Area will not be replaced, as natural regeneration through seeding is expected to fill any gaps within the canopy of these woodlands. A twenty-year timeframe is appropriate for replacement, as after this time period, it is expected that the new tree planting within the site will have grown sufficiently to

		provide amenity and ecosystem services benefits mitigation for any ash trees that die after the twenty-year timeframe has expired.
24.4	**Ground Conditions**: section 17.3 of ES chapter 17 covers ground conditions noting that significant effects on ground conditions during construction and operation are unlikely (paragraph 17.3.1) and that due to the agricultural nature of the site, there is a low risk from past land use, surrounding land use, ground instability and contamination (paragraph 17.3.3).	This statement has been reviewed and is noted. It is acknowledged that the Council has no comment on this point. No further response is required.
24.5	The ES does not address potential contamination that may arise from the decommissioning stage. The Council raises a concern regarding potential contamination from solar panels during decommissioning particularly if they are damaged and stored during this phase.	**Appendix 2.5 Outline Decommissioning Environmental Management Plan (oDEMP) (REP1-011 to REP1-012)** has been prepared and is secured via Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**. (Note that the requirement numbering has changed in the latest version of the Draft DCO). Requirement 19(3) of the Draft DCO states that "*Within 12 months of the date notified pursuant to sub-paragraph (2), the undertaker must submit to the relevant planning authority for that part a decommissioning environmental management plan for approval (following consultation with the Environment Agency) which must include a decommissioning traffic management plan and site waste management plan*". Requirement 19(4) of the Draft DCO states that "*Where the undertaker decides to decommission a part of the authorised development that falls within the administrative areas of multiple planning authorities, the decommissioning environmental management plan must be submitted to each relevant planning authority and the approval of all relevant*

		planning authorities is required for the purposes of this paragraph". Requirement 19(5) of the Draft DCO states that "*The decommissioning environmental management plan must be substantially in accordance with the outline decommissioning environmental management plan. (6) No decommissioning works may be carried out until the relevant planning authority has approved the decommissioning environmental management plan submitted in relation to those works*". These permit the opportunity for measures to manage potential contamination as a result of decommissioning to be agreed at the decommissioning stage.
24.6	The Council recommends that a schedule of the condition of the land is prepared prior to decommissioning works being commenced. This should include some soil testing comprising a Phase II contaminated land assessment after decommissioning is completed and before the site is returned to agricultural use. Intrusive sampling can be carried out to determine the risk, from which remediation and verification (if needed) can be carried out to address any concerns.	**Appendix 2.5 Outline Decommissioning Environmental Management Plan (oDEMP) (REP1-011 to REP1-012)** has been prepared and is secured via Requirement 19 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**. Requirement 19(3) of the Draft DCO states that "*Within 12 months of the date notified pursuant to sub-paragraph (2), the undertaker must submit to the relevant planning authority for that part a decommissioning environmental management plan for approval (following consultation with the Environment Agency) which must include a decommissioning traffic management plan and site waste management plan*". Requirement 19(4) of the Draft DCO states that "*Where the undertaker decides to decommission a part of the authorised development that falls within the administrative areas of multiple planning authorities, the decommissioning environmental management plan must be submitted to each relevant planning authority and the approval of all relevant*

		planning authorities is required for the purposes of this paragraph". Requirement 19(5) of the Draft DCO states that "*The decommissioning environmental management plan must be substantially in accordance with the outline decommissioning environmental management plan. (6) No decommissioning works may be carried out until the relevant planning authority has approved the decommissioning environmental management plan submitted in relation to those works*". These permit the opportunity for the potential requirement for soil testing to be agreed at the decommissioning stage.
24.7	**Waste:** the Council defers to the views of Lincolnshire County Council as the relevant Waste Planning Authority. The Council requests that the outline Decommissioning Management Plan includes a protocol for the disposal of solar panels. The Council would support an additional Requirement to fix the replacement rate of solar panels and other equipment to that set out in the DCO application.	This statement has been reviewed and is noted.
24.8	**Major Accidents and Disasters:** the Council is principally concerns with the BESS and fire safety. Paragraph 1(8) of Schedule 4 to the EIA Regulations requires consideration to be given to the risks of major accidents and disasters but does not include a definition of these terms. The regulations, however, specifically refer to effect on human health.	Major accidents and disasters is considered within Section 17.5 Major Accidents and Disaster of **Chapter 17 Other Environmental Topics (APP-068)** of the Environmental Statement (ES). Table 17.3 Major Accidents and Disasters Associated with the Proposed Development of Chapter 17 sets out the types of accidents and disasters of relevance to the Proposed Development based upon the location of the Site and proposed land use and the relating receptor(s). Table 17.3 also includes reference to corresponding technical chapters within the ES, assessments and management plans (where relevant).

		Fire is identified as a potential risk and paragraph 17.5.6 sets out the Applicant's consideration of the topic and summary conclusion that, along with the safety measures secured through the **Outline Battery Safety Management Plan (APP-279)** (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**), 'Given the robust testing and stringent legislative controls that are in place regarding battery manufacture, significant effects in relation to fire are not considered to be likely and the topic, therefore, does not require further consideration within this ES'. Potential effects of the Proposed Development of relevance to human health have been assessed throughout the ES within **Chapter 9 Access and Traffic (APP-060)**, **Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**, **Chapter 15 Socio Economics (APP-066)** and **Chapter 16 Air Quality (APP-067)**. Human health is then considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**. Where required, mitigation measures are identified (see Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **ES Appendix 2.3 Embedded Mitigation (APP-076),** to be secured by the **Draft DCO (Document Ref: 3.1)**) and implemented in order to avoid the potential for adverse impacts relating to human health determinants. No significant effects upon human health are identified.

24.9	EN-1, EN-3 and EN-5 are silent regarding consideration of major accidents and disasters and other safety issues which may arise specifically from solar PV development and associated energy storage systems as well as electricity networks infrastructure.	The general point is acknowledged, although it is noted safety is considered in these NPSs in regards glint and glare, good design, and other topics.
24.10	The Planning Practice Guidance section on 'Renewable and low carbon energy' provides specific guidance regarding potential risks arising from BESSs, including engagement with the relevant local fire and rescue service so that its views can be taken into account regarding potential mitigations which could be put into place in the event of an incident.	An **Outline Battery Safety Management Plan (oBSMP) (APP-279)** (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**) has been prepared and submitted as part of the application. Section 3 of this details the stakeholder engagement that was undertaken to inform the development of the oBSMP. The Lincolnshire Fire and Rescue Service were included as part of the engagement process. Additionally, within Section 2 of the oBSMP, paragraph 2.3.3 states that "*…prior to the commencement of construction of the BESS, a detailed BSMP (which must be substantially in accordance with this oBSMP) must be submitted to and, in consultation with North Kesteven District Council and Lincolnshire Fire and Rescue, approved by the relevant planning authority (this being Lincolnshire County Council)*". As such, it is demonstrated that the Applicant has undertaken previous engagement with Lincolnshire Fire and Rescue Service in respect of the oBSMP and is committed to undertake further engagement with respect of the detailed BSMP (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**).
24.11	Part (7) of CLLP policy S53 'Design and Amenity' requires development to avoid adverse impacts associated with noise, dust and air quality, and part (9) requires schemes to minimise the need for resources both in construction and	This statement has been reviewed and is noted. It is acknowledged that the Council references Policy S53 of the Central Lincolnshire Local Plan (adopted April 2023). Section 19.2 Additional Mitigation of **Chapter 19 Summary of**

	operation of buildings and be easily adaptable to avoid unnecessary waste production.	**Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** (secured via the **Draft DCO (Document Ref: 3.1)**) detail the mitigation measures to reduce these impacts. With the identified mitigation measures, which include the preparation of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** (secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**), **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)** (secured via Requirement 19 of Schedule 2 to the **Draft DCO)**, **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (secured via Requirement 7 of Schedule 2 in the **Draft DCO**)**,** and **Appendix 9.3 Outline Construction Traffic Management Plan (APP-159)** (secured via Requirement 13 of Schedule 2 in the **Draft DCO**)**.** It should be noted that a Dust Management Plan (DMP) and a Soils Management Plan (SMP) will be integrated into the detailed Construction Environmental Management Plan (CEMP).
24.12	CLLP policy S54 seeks to ensure that where any potential adverse health impacts are identified the developer will be expected to demonstrate how these will be addressed and mitigated.	Potential effects of the Proposed Development of relevance to human health have been assessed throughout the ES within **Chapter 9 Access and Traffic (APP-060)**, **Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 13 Climate Change (APP-064)**, **Chapter 15 Socio Economics (APP-066)** and **Chapter 16 Air Quality (APP-067)**. Human health is then considered within Section 17.7 of **Chapter 17 Other Environmental Topics (APP-068)**. Where required, mitigation measures (detailed within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**

		(secured via the **Draft DCO (Document Ref: 3.1)**) will be implemented in order to avoid the potential for adverse impacts relating to human health determinants. No significant effects upon human health are identified.
24.13	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 (still in draft) that was due in 2024.	This statement has been reviewed and is noted. It is acknowledged that the Council has identified emerging guidance. No further response is required.
24.14	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.	Fire is identified as a potential risk within Section 17.5 Major Accidents and Disasters of **Chapter 17 Other Environmental Topics (APP-068)** of the Environmental Statement (ES) and is discussed within Table 17.3 Major Accidents and Disasters Associated with the Proposed Development and within paragraph 17.5.6 of the chapter. As stated within Table 17.3. "*Consultation with Lincolnshire Fire & Rescue service and relevant legislation has influenced the overall Proposed Development design to ensure adequate siting of BESS and grid infrastructure away from sensitive receptors*". Paragraph 17.5. sets out the Applicant's consideration of this topic and summary conclusion that, along with the safety measures secured through the **Outline Battery Safety Management Plan ('oBSMP') (APP-279)**, "*Given the robust testing and stringent legislative controls that are in place regarding battery manufacture, significant effects in*

		relation to fire are not considered to be likely and the topic, therefore, does not require further consideration within this ES". Appendix 1 of **oBSMP (APP-279)** contains an Assessment of Unplanned Atmospheric Emissions from Battery Energy Storage Systems. This contains the results of detailed air dispersion modelling using ADMS-6of unplanned atmospheric emissions from a potential fire at the proposed battery storage park. For the purposes of assessing impacts on sensitive human receptors (identified residential properties in Figure 4.1) short term emissions from NO2, CO, HF and CH4 were included in the dispersion modelling. The dispersion model results were compared against the relevant assessment levels (set out in section 2). HF is particularly associated with battery fires and for the 8-hour mean HF PCs are below 10% of the relevant assessment level at all discrete modelled receptors. As such, predicted effects of 8-hour mean HF concentrations on sensitive human receptors is considered insignificant. In summary, the impacts of emissions of NO2, CO, HF and CH4 from the proposed development on existing sensitive human receptors is predicted to be insignificant. As detailed within Section 2 of the **oBSMP (APP-279)**, paragraph 2.3.3 states that "*…prior to the commencement of construction of the BESS, a detailed BSMP (which must be substantially in accordance with this oBSMP) must be submitted to and, in consultation with North Kesteven District Council and Lincolnshire Fire and Rescue, approved by the relevant planning authority (this being Lincolnshire County Council)*".

		Thus, in addition to the previous engagement undertaken by the Applicant in respect of the oBSMP, the Applicant is committed to undertake further engagement (including with *North Kesteven District Council*) with respect of the detailed BSMP (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**).
24.15	The ES notes that there are several battery storage technologies available to system designers, and while it is likely that the chosen BESS design at Beacon Fen will be based on a lithium-ion battery cell type, the exact technology and system will be determined at the detailed design stage. The applicant notes though that it has been assumed that Lithium Iron Phosphate (LFP) cells, a popular type of chemistry within the lithium-ion battery type, and used on other sites being developed in the UK market, will be utilised. The applicant suggests that this is a 'reasonable worst-case' scenario for the purposes of evaluating fire risks and outlining safety provisions.	Paragraph 2 of the Executive Summary of the **OBSMP (APP-279)** states that "*To support the preparation of this OBSMP, it has been assumed that Lithium Iron Phosphate (LFP) cells, a popular type of chemistry within the lithium-ion family used on other sites being developed in the UK market, will be utilised. This is considered to be a reasonable worst-case for the purposes of evaluating risk and outlining safety provisions*". This is also reiterated within paragraph 2.3.2 of the oBSMP. As confirmed in the **OBSMP (APP-279)**, the Applicant intends to have regard to NFCC guidance in the preparation of the detailed BSMP, which must be submitted to and, in consultation with NKDC and LFR, approved by the relevant planning authority in accordance with Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**. This **OBSMP (APP-279)** outlines the key fire safety provisions for the BESS. 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. Further, the protective provisions included in the **Draft DCO (Document Ref: 3.1)** enable LFR to undertake an annual site familiarisation exercise (funded by the Applicant) and to provide the

		necessary assurance to LFR that all the required systems and measures are in place.
24.16	The degree to which the Planning Act (2008) can compel what is essentially and ultimately a matter of customer choice is unclear. However, research suggests that LFP cells have an advantage over other lithium-ion chemistries in relation to thermal and chemical stability, which improves battery safety, as well as having a higher charge/discharge cycle life. The Council's view is that the ExA should consider this matter through the Examination.	As discussed above, the **oBSMP (APP-279)** assumed LFP cells, as a reasonable worst-case for the purposes of evaluating risk and outlining safety provisions. The Applicant's position on this matter is set out in the Applicant Responses to Relevant Representation (REP1-039) document, in particular in its response to NKDC (RR-004) on pages 23 and 24.
24.17	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's position on this matter is set out in the **Applicant Responses to Relevant Representation (REP1-039)**, in particular in its response to NKDC (RR-004) on pages 23 and 24.
24.18	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 planned 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	The Applicant's position on this matter is set out in the **Applicant Responses to Relevant Representation (REP1-039)**, in particular its response to NKDC (RR-004) on pages 23 and 24. As discussed above, the **oBSMP (APP-279)** assumed LFP cells, as a reasonable worst-case for the purposes of evaluating risk and outlining safety provisions. This **oBSMP (APP-279)** outlines the key fire safety provisions for the BESS. The detailed design of the BESS must accord with design commitments and project parameters, and must also be in accordance with the BSMP.

	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.	
24.19	Table 17.3 of the ES briefly explains that the main potential hazard of BESS failure is thermal runaway and, if not controlled, fire. The Council notes that Lincolnshire Fire and Rescue Service have been consulted and the relevant legislation has influenced the proposal design. ES paragraph 17.5.6 also describes the fire safety precautions that will be taken and makes reference to the outline Battery Safety Management Plan (oBSMP).	This statement has been reviewed and is noted. It is acknowledged that the Council has highlighted that **Chapter 17 Other Environmental Topics (APP-068) states that** 'the main potential hazard of BESS failure is thermal runaway and, if not controlled, fire' and that an **oBSMP (APP-279)** has been prepared in consultation with the Lincolnshire Fire and Rescue Service. No further response is required.
24.20	As above the Council notes from the outline Battery Safety Management Plan (oBSMP) that it has been assumed the BESS would utilise Lithium Iron Phosphate (LFP) lithium-ion battery technology. The oBSMP includes at Appendix 1, an Assessment of Unplanned Atmospheric Emissions from BESSs which concludes that the overall impact of unplanned emissions on existing sensitive human receptors would not be significant. The Appendix, Table 4.2 'Modelled Human Health Sensitive Receptor Locations' considers 14 sensitive receptor locations, meteorological and land topography data, and assesses the location and size/composition of the proposed BESS as shown on the submitted site layout plan.	This statement has been reviewed and is noted. It is acknowledged that the Council has highlighted that the **oBSMP (APP-279)** states the use of LFP lithium-ion battery technology. It is acknowledged that the Council has referenced the findings of Appendix 1 of the **oBSMP (APP-279).** No further response is required.
24.21	Dispersion modelling was undertaken and for the purposes of assessing impacts on sensitive human receptors, short term emissions from nitrogen dioxide, carbon monoxide, hydrogen fluoride and methane were included in the dispersion modelling. The modelling states that the concentrations of these substances associated with an unplanned atmospheric emission from a potential fire at the	This statement has been reviewed and is noted. It is acknowledged that the Council has referenced the dispersion modelling included within Appendix 1 of the **oBSMP (APP-279)**. No further response is required.

	BESS are less than 10% of the relevant National Air Quality Objectives and Workplace Exposure Limits.	
24.22	The oBSMP describes the proposed BESS layout, fire service access and provision of firefighting water and equipment. Further fire risk-focussed studies will be undertaken to inform the overall design solution at detailed design stage in consultation with the Lincolnshire Fire and Rescue Service (LFRS) and in accordance with the National Fire Chiefs Council guidance. It is not clear whether a further Assessment of Unplanned Atmospheric Emissions will be undertaken at detailed design stage.	The Applicant is committed to undertake further engagement with NKDC with respect of the detailed BSMP (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**). The necessity to undertake a second Assessment of Unplanned Atmospheric Emissions will be considered at that time.
24.23	Notwithstanding the isolated location of the BESS relative to centres of population and noting a separation distance of over 800m to the closest residential property, the Council still maintains concerns about the potential risk to human health arising from fire related accidents at BESS developments.	Fire is identified as a potential risk within Section 17.5 Major Accidents and Disasters of **Chapter 17 Other Environmental Topics (APP-068)** of the Environmental Statement (ES) and is discussed within Table 17.3 Major Accidents and Disasters Associated with the Proposed Development and within paragraph 17.5.6 of the chapter. As stated within Table 17.3. "*Consultation with Lincolnshire Fire & Rescue service and relevant legislation has influenced the overall Proposed Development design to ensure adequate siting of BESS and grid infrastructure away from sensitive receptors*". Paragraph 17.5. sets out the Applicant's consideration of this topic and summary conclusion that, along with the safety measures secured through the **oBSMP (APP-279)**, "*Given the robust testing and stringent legislative controls that are in place regarding battery manufacture, significant effects in relation to fire are not considered to be likely and the topic, therefore, does not require further consideration within this ES"*. As detailed within Section 3 of the **oBSMP (APP-279)**, stakeholder engagement was undertaken to inform the

		development of the oBSMP and included engagement with the Lincolnshire Fire and Rescue Service. Additionally, within Section 2 of the oBSMP, paragraph 2.3.3 states that "*…prior to the commencement of construction of the BESS, a detailed BSMP (which must be substantially in accordance with this oBSMP) must be submitted to and, in consultation with North Kesteven District Council and Lincolnshire Fire and Rescue, approved by the relevant planning authority (this being Lincolnshire County Council)*". Thus, in addition to the previous engagement undertaken by the Applicant in respect of the oBSMP, the Applicant is committed to undertake further engagement (including with NKDC) with respect of the detailed BSMP (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**).
24.24	The Council will defer to comments from LFRS to be provided as part of LCC's LIR and also advise the ExA to have regard to advice from the UK Health Security Agency (UKHSA).	This statement has been reviewed and is noted. No further response is required.
24.25	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. 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's position on this matter is set out in the **Applicant Responses to Relevant Representation (REP1-039)**, in particular its response to NKDC (RR-004) on pages 23 and 24.

24.26	The Council considers that there would be a **negative** impact as a result of fire safety risk on human health until the LFRS's requirements are agreed; including securing a monitoring contribution through the DCO.	The Applicant can confirm the Draft DCO submitted with the application and subsequent versions secure provision of these contributions. Please refer to the Protective Provisions Part 6 of Schedule 11 of the **Draft Development Consent Order (APP-039 – application version - and AS-008 – Deadline 1 version)**. The Applicant is committed to undertake engagement with both the LFR and NKDC with respect of the detailed BSMP (secured via Requirement 6 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**).
24.27	**Utilities Telecommunications and Television Reception**: no comments	It is acknowledged that the Council has no comment in respect of utilities telecommunications and television reception. No further response is required.
24.28	**Human Health**: comments have been made in respect of air quality, noise and vibration, climate change and socio-economics above. The Council would also defer to the views of Lincolnshire County Council in respect of public health.	It is acknowledged that the Council has made comments in respect of in respect of air quality, noise and vibration, climate change and socio-economics (above) and defers to Lincolnshire County Council in respect of public health. No further response is required.
24.29	**Electromagnetic Fields**: no comment	This statement has been reviewed and is noted. It is acknowledged that the Council has no comment in respect of electromagnetic fields. No further response is required.
24.30	**Health and Safety Executive (HSE)**: no comment on presence of Major Accident Hazard Pipeline and defer to the views of the HSE.	This statement has been reviewed and is noted. It is acknowledged that the Council has no comment in respect the presence of Major Accident Hazard Pipeline and defers to the views of the Health and Safety Executive. No further response is required.
24.31	**Extended Period of Outage**: In line with another DCO decision in North Kesteven (Heckington Fen solar farm)	In the event the Proposed Development should stop generating electricity for any continuous period, the Applicant

	and a DCO that is under examination (Springwell Solar Farm), the Council suggests that provision is made for periods of extended outage. In line with the provision made within Heckington Fen solar farm outline Operational Environmental Management Plan (oOEMP), the Council suggests that such a provision would cover a situation whereby the development should stop generating electricity for a continuous period of 12 months for non-maintenance reasons and would enable the applicant to provide details on the steps it is taking to rectify the issue along with an expected timeframe for when generation is predicted to re-commence operation.	would have a commercial interest in repairing the solar farm as quickly as possible as outgoing would not cease. The Applicant disagrees that a specific provision is required for a situation whereby the development should stop generating electricity for a continuous period of 12 months. This would also be duplicative of the controls and reporting that will be operated by NESO as grid operator around non supply, and does not meet the planning test of necessity.
24.32	The Council does not anticipate that the provision would be triggered by a force majeure event or if the outage occurred as a result of the National Grid undertaking any activities to the connection substation and/or transmission network. The Council would welcome discussions with the applicant on this matter as to whether this should be included in the outline Decommissioning Management Plan or as an additional Requirement in the DCO as it is noted that there is no oOEMP submitted with the application.	As above.
24.33	The Council also notes that no provision is made within the applicant's Funding Statement for decommissioning nor an extended period of outage. The Council consider that funding for decommissioning is not suitably addressed within the draft DCO. The Council notes that the submitted Funding Statement, while it may be adequate for compulsory acquisition purposes, does not include evidence for the funding of decommissioning. The scheme thus does not provide sufficient security that decommissioning could be funded by the applicant. Consequently, the Council would support an additional	The Applicant makes references to its response to Action Point 1 from Issue Specific Hearing 1, included within the **Written Summary of Oral Submissions from ISH1 and Responses to Action Points (REP1-030)** which provides clarifications on the intended funding mechanism for the scheme and how it proposes to ensure that funding obligations are in place for all stages of the development, including decommissioning. In light of the above, the Applicant does not consider any additional requirements are necessary.

	Requirement requiring theprovision for funding (by way of a bond or other form of security) for decommissioning both as a result of an extended period of outage and at the end of the lifespan of the development.	
24.34	The Council would draw the ExA's attention to two NSIP examples where this matter has been considered: **Helios Renewable Energy Project (under Recommendation**): p37 of the draft DCO, Requirement 5(3) includes provision for notification to the local planning authority that the undertaker has put in place the requisite decommissioning security. This was required as the Funding Statement did not include provision for decommissioning funding. Requirement 5(3) states 'No later than year 15 of operation the undertaker must notify the local planning authority that the undertaker has put in place the requisite decommissioning security in the form as required by the landowners.' EN010140-001078-3.1 Draft Development Consent Order (Clean).pdf **Oaklands Farm Solar Park (determined):** p8 paragraph 4.22 of the SOS's decision letter states that 'the Applicant stated a fund was not necessary since Requirement 22 of the dDCO secured decommissioning of the site, was legally enforceable, and was consistent with recent precedent. The Applicant considered its funding statement as part of the application demonstrated it had sufficient funds to construct, operate and decommission the Proposed Development.' This reinforces the Council's argument that if it is not demonstrated that decommissioning funding is not suitably covered within the Funding Statement, then it	In respect of the draft DCO, Requirement 19 provides that decommissioning of Work Nos. 1, 2 and 3 must commence no later than 40 years following the date of final commissioning of the authorised development. This requirement also provides that, unless otherwise agreed in writing with the relevant planning authority, no later than 12 months prior to the date the undertaker intends to decommission any part of the authorised development, the undertaker must notify the relevant planning authority of the intended date of decommissioning. Please refer to the **Applicants Response to ExAs ExQs (Document 9.6)** submitted at this deadline, specifically the Applicant's response to question GCT.1.14.

	would be in public interest to ensure that it is covered in the draft DCO by way of an additional Requirement. Decision Letter - Oaklands Farm Solar Park - 19.06.2025	
24.35	The Council considers that there would be a **negative** impact on the landscape until the provisions are made for unexpected cessation of energy generation are made as part of the DCO; including through an amendment to the Funding Statement.	The Applicant notes this comment.
	Cumulative Effects	
25.1	The EIA Regulations at Schedule 4 require that an ES should include '*a description of the likely significant effects on the environment resulting from, inter alia, (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affect or the use of natural resources.'*	The potential inter-cumulative impacts and intra-cumulative impacts are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental Statement (ES) and assessed within **Chapter 18 Cumulative Effects (APP-069)**. In terms of potential inter-cumulative impacts, **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and assess these developments**.** Overall, it is considered that a proportionate and robust approach has been adopted in terms of identifying and refining the other developments (in agreement the host local authorities) for consideration within the ES, and the assessment undertaken.
25.2	EN-1 states at paragraph 4.1.5 '*In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account; its potential adverse impacts, including on the environment, and including any long-term*	This statement has been reviewed and is noted. No further response is required.

	and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.'	
25.3	CLLP policy S14 supports proposals for renewable energy schemes where the direct, indirect and cumulative impacts on the following consideration are met or will be made acceptable. The following tests will have to be met: The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the historic landscape; and highway safety and rail safety; and The impacts are acceptable on aviation and defence navigation system / communications; and The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.	Table 18.3 Summary of Inter-Cumulative Effects of **Chapter 18 Cumulative Effects (APP-069)** details the inter-cumulative impacts that have been considered, the relating mitigation measures (detailed within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** and secured via the **Draft DCO (Document Ref: 3.1)**) and the residual effects with these measures in place. With the identified mitigation measures, which include the preparation of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**, **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)**, **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** and **Appendix 9.3 Outline Construction Traffic Management Plan (APP-159)** in place, only one significant inter-cumulative impact is identified. This is in respect of 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. Table 18.4 Summary of Intra-Cumulative Effect Interactions during Construction and Decommissioning of Chapter 18 details the intra-cumulative impacts that have been considered, the relating mitigation measures (listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects** and **Appendix 2.3 Embedded Mitigation**) (secured via the **Draft**

		DCO (Document Ref: 3.1)) and the residual effects with these measures in place. With the identified mitigation measures in place, only one significant intra-cumulative impact is identified. This is in respect of the Grade I Listed Church of St Andrew at Asgarby due to intervisibility, new movement in the landscape, an increase in traffic noise, increase in vehicular lighting, an increase in air pollutants and the presence of new highway infrastructure within a predominantly agricultural and historical landscape. Overall, it is considered that no 'unacceptable' cumulative impacts have been identified.
25.4	The ES has considered intra-project combined effects and inter-project cumulative effects. In considering inter-project cumulative effects, the ES considered both a long-list and a short-list of projects after consultation with the Council (Appendix 4.1 and 4.2).	This statement has been reviewed and it is noted that the Council acknowledges preparation of **Appendix 4.1 Cumulative Assessment Long List (APP-081)** and **Appendix 4.2 Cumulative Assessment Short List (APP-082)**), the latter of which was agreed with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council and the cumulative impact assessment that is included within **Chapters 6** to **16 (APP-057 to APP 067)** and **Chapter 18 Cumulative Effects (APP-069)** of the Environmental Statement (ES). No further response is required.
25.5	The short list of cumulative sites included 21 NSIP projects and 47 other existing or proposed developments such as residential developments, solar parks, quarry extensions, industrial and employment parks and infrastructure.	This comment has been reviewed and is noted. It is acknowledged that the Council highlights **Appendix 4.2 Cumulative Assessment Short List (APP-082)**.
25.6	The ES considered the inter-project cumulative effects on landscape and visual, ecology, cultural heritage, access and transport, noise and vibration, water resources and flood risk, climate change, soils and agriculture, socio-economic and air quality. At paragraph 18.5.3 it identifies	Table 18.3 Summary of Inter-Cumulative Effects of **Chapter 18 Cumulative Effects (APP-069)** details the inter-cumulative impacts that have been considered, the relating mitigation measures (listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant**

	that there is potential for significant adverse inter-cumulative effects in relation to agricultural land in terms of the total agricultural land (and BMV land) lost due to the proposed development in combination with other developments. The ES calculates that when all the considered developments within the administrative boundaries of LCC are taken into account, they equate to 2% (11,962.85ha) of which 0.82% (4,927ha) is BMV land.	**Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) (secured via the **Draft DCO (Document Ref: 3.1)**) and the residual effects with these measures in place. With the identified mitigation measures, in place, only one significant inter-cumulative impact is identified. This is in respect of 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.
25.7	The Council disagrees with the conclusion set out in Table 18.3, Summary of Inter-Cumulative Effects, on Landscape and Visual impacts. As stated in paragraphs 13.44-49 and summarised at 13.53 of the LIR, 'cumulative landscape and visual effects with other renewable energy and infrastructure projects across the county present a further concern. Whilst the immediate cumulative schemes within the ES are relatively modest, the scale of other NSIP and large-scale energy projects proposed in the wider area raises the potential for extensive alteration of the regional landscape character. The combined effect of these developments could be a marked and enduring change, both directly through a change in land use and introduction of solar as a key element, and also in the perception and experience of the landscape, particularly for visual receptors travelling through the landscape and experiencing sequential effects. This is a clear and marked change to landscape character.'	**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. The cumulative assessment has been undertaken in accordance with the scope detailed within **Chapter 4 Scope and Methodology (APP-055)** and utilising **Appendix 4.2 Cumulative Assessment Short List (APP-082)**, the latter of which was agreed by the Council. 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 National Character Area (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.

25.8	The Council disagrees with the conclusion set out in Table 18.3, Summary of Inter-Cumulative Effects, on Ecology. The Council refers to the comments by AECOM (attached at Appendix B) which state that; *'There is insufficient clarity on the mitigation for ground nesting birds (wintering birds may also have relevance) so it is not possible to agree there would be no cumulative impacts. Some of the other schemes assessed are in development or at Examination and their mitigation is yet to be confirmed as sufficient. These birds cannot be discounted unless it is agreed that the Beacon Fen mitigation is sufficient to address the project-specific impact on ground nesting birds. My reading of Chapter 7 (7.6.53) is that an impact is predicted but it is not considered significant in isolation. It is also not stated that mitigation will be provided, and the Outline LEMP does not appear to include mitigation for ground nesting birds. Therefore the assessment in Chapter 7 does not preclude potential for cumulative impacts and effects. Further assessment and information is required.'*	The impact on ground nesting birds from the development has been reviewed. There will be loss of arable land, however there will be a large increase in food supply from different grassland types and new hedgerows to improve the quality of habitats. Recent studies (e.g Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated landscape. Bird Study, 1–6) have shown that the diversity and abundance of birds can increase on solar farms compared to arable habitats, with management being key. The applicant has committed to varying timings of cuts of both grassland and hedgerows within the oLEMP (APP-089) to produce heterogenous landscapes. Further mitigation includes inclusion of fencing in Section 7.6.65 (secured in the oCEMP, APP-077), to prevent mammalian predators accessing ground nesting birds' eggs or chicks. By varying the timings of cutting grassland and hedgerows there will be a reserve of food overwinter for birds to feed on. Under the present management the fields are mostly bare earth and many hedges are cut back, stripping them of seeds and berries as well as removing potential dwellings or wintering birds. The management of the vegetation in this way will benefit birds that normally use the Site as well as those roosting in the surrounding farmland, which will be able to come to the Site to feed. When considering the cumulative impact in combination with other projects the Applicant has considered factors including the ecological receptor impacted (in this case breeding and wintering birds), distance and size of the proposed projects and timing (i.e. could the impacts overlap). The Nationally Significant Infrastructure Projects were all located well away

		(at least 5 km) from the Solar Array Area where the long-term impacts on birds could occur. Furthermore, with the exceptions of gadwall and lapwings bird numbers were low (relative to the Lincolnshire population). Therefore, the Proposed Development is unlikely to have a cumulative impact with other projects locally (due to the distances between projects) or at a county level (due to the relatively low numbers on site).
25.9	The Council also disagrees with the conclusion set out in Table 18.3, Summary of Inter-Cumulative Effects, on Socio-economics. The Council refers to its commentary above which express concerns about cumulative effects in respect of serviced visitor accommodation, on the visitor economy and the agri-food sector.	This statement has been reviewed and is acknowledged by the Applicant. In respect to the Council's commentary above, a detailed reply to Council's concerns regarding cumulative effects in respect of serviced visitor accommodation is answered in response to comments 22.13 and 22.14. A reply regarding cumulative impact on the visitor economy is provided in response to point 22.15. An answer to Council's concern regarding the agri-food sector is included in a response to comment 22.16.
25.10	The Council considers that there is potential for significant inter-project effects to arise and that this would lead to a **negative** impact.	Potential inter-cumulative impacts are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental Statement (ES) and assessed within **Chapter 18 Cumulative Effects (APP-069)**. In terms of potential inter-cumulative impacts, **Chapter 4 Scope and Methodology (APP-055)** details the four-stage approach that was adopted to establish and agree (with Lincolnshire County Council, North Kesteven District Council, Boston Borough Council and South Holland District Council) the other developments considered that are listed within **Appendix 4.2 Cumulative Assessment Short List (APP-082)**) and assess these developments**.** Table 18.3 Summary of Inter-Cumulative Effects and Table 18.4 Summary of Intra-Cumulative Effect Interactions during

		Construction and Decommissioning of **Chapter 18 Cumulative Effects (APP-069)** details the cumulative impacts that have been considered, the relating mitigation measures (listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** secured via the **Draft DCO (Document Ref: 3.1)**) and the residual effects with these measures in place. With the identified mitigation measures in place, only one significant inter-cumulative impact and one significant intra-cumulative impact have been identified. These are in respect of: 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; and The Grade I Listed Church of St Andrew at Asgarby due to intervisibility, new movement in the landscape, an increase in traffic noise, increase in vehicular lighting, an increase in air pollutants and the presence of new highway infrastructure within a predominantly agricultural and historical landscape. Overall, it is considered that a proportionate and robust approach has been adopted in terms of identifying and refining the other developments (in agreement the host local authorities) for consideration within the ES.
26.1	With reference to the Draft Development Consent Order, in addition to the comments provided above, the Council	The Applicant notes the comment.

	wishes to raise the following points on a without prejudice basis.	
26.2	a. Part 1 (Interpretation) The Council considers that the definition of 'maintain' is too broad in that it would allow for the wholesale replacement of up to 99% of solar panels over the life of the development which would bring potential incremental environmental effects. It would be difficult for the relevant authority to monitor ongoing panel replacements unless provisions were put into place within the DCO such as an additional requirement to limit the replacement of panels to the percentage stated in the ES and a replacement panel monitoring reporting scheme where deviations from the approved plans are reported to the relevant planning authority on an annual basis.	The Applicant has considered the most up to date precedent in recently made solar DCOs (the latest being the *Tillbridge Solar Order 2025*), and has updated the drafting of the definition of "maintain" in the **Draft DCO (Document Ref: 3.1)** as follows to make the limitations of the definition clear: *""maintain" includes inspect, upkeep, repair, refurbish, adjust, alter, remove, reconstruct and replace in relation to the authorised development, **but not remove, reconstruct or replace the whole of, the authorised development,** provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement; and any derivative of "maintain" must be construed accordingly;"* In any event, any maintenance works which comprise the replacement of panels must not give rise to materially new or materially different environmental effects to those identified in the Environmental Statement. Section 9.6 of **Chapter 9 Access and Traffic (APP-060)** assesses the potential effects of maintenance and replacement of panels during the operational phase of the Proposed Development, stating that: *"At this stage, the level of vehicle trips associated with component replacement (all types of electrical equipment) is expected to be considerably lower than the level of vehicle trips generated during the peak construction phase. For example, even in the instance that full panel replacement is chosen, this would be programmed in stages over a much longer period than the construction phase (when the panels will be installed more rapidly). BESS equipment is also likely*

		to be replaced incrementally. This is because the generating station will be an operational asset on the national grid for which it is important to maximise the number of panels which are kept operational at any given time and avoid compromising the electricity generating capacity of the Proposed Development. It can therefore be seen that there is no proposal to install a large operational laydown area as part of the Solar Array Area. Otherwise, components would be replaced as and when required throughout the operational lifetime of the Proposed Development (circa. 40-year period). It is estimated that component lifetimes are intermittently dispersed over the Proposed Development's lifetime." In light of the controls described above, the Applicant does not consider it necessary for the Proposed Development to require a replacement panel monitoring reporting scheme. In recently made solar DCOs, the Secretary of State has not considered it necessary to require this sort of scheme and has instead been satisfied that the scope of the environmental assessment and definition of "maintain" are sufficient controls to ensure that there will be no unforeseen incremental environmental effects. The Applicant sees no reason why this application should be treated differently.
26.3	b. Part 6 (Miscellaneous and General), Article 43 and 45 Article 43 provides a blanket approval to remove hedgerows and protected trees without the need to notify the relevant authority or provide replacement planting. This provision risks undermining the principles and calculation of BNG provision within the site and could result in the loss of valuable trees. The Council recommends that this article is amended to include better safeguards to protected trees.	The Applicant disagrees that Article 44 (note in the latest Draft DCO this is now Article 44) provides the undertaker with a "*blanket approval to remove hedgerows and protected trees without the need to notify the relevant authority or provide replacement planting*". This is because the exercise of the power in Article 44 can and must only be exercised in accordance with the requirements set out in Schedule 2 to the **Draft DCO (Document Ref: 3.1)** (see Article 3(1) of the **Draft DCO (Document Ref: 3.1)**), particularly requirements 7, 8 and

		12. The drafting of Article 44 has been updated to clarify the relationship between the powers in the article and the relevant management plans.
26.4	Article 45 provides for a time period of 8 weeks for determination of any consent, agreement or approval required (save for applications made pursuant to Part 2 of Schedule 2). The Council considers that a time period of 10 weeks would be more consistent with the timeframe for the discharge of requirements.	The Applicant considers that the time period of 8 weeks specified in Article 46(4) (note in the latest Draft DCO this is now Article 46) is appropriate and strikes the correct balance between giving the discharging authority sufficient time to consider the approval/consent/agreement whilst also not unduly delaying the delivery of critical national priority infrastructure. Furthermore, the undertaker and relevant consenting authority may (both acting reasonably) agree a longer period for the determination of any application. The drafting of Article 46 is precedented in numerous solar DCOs, most recently Article 46 of the **Tillbridge Solar Order 2025**. The Applicant sees no reason why it is not appropriate to follow this precedent.
26.5	c. Schedule 2 - Requirements The Council provides comments on the draft requirements in the table below: **No.** **Requirement** **NKDC Suggested Amendment** 6 Battery Safety Management NKDC suggest that the UKHSA is added as a consultee 8 Biodiversity Net Gain NKDC suggest that the Requirement includes specific reference to the minimum percentage of habitat, hedgerow and watercourse unit gain to be	The Applicant responds as follows: **Requirement 6 (Battery Safety Management):** The Applicant does not consider it necessary to add UK Health Security Agency (UKHSA) as a named consultee in Requirement 6 for the following reasons: Despite submitting a relevant representation (RR-016) UKHSA has not requested to be a named consultee for the discharge of this requirement; UKHSA has not been included as a named consultee in the equivalent requirements in other recent solar DCOs (see, for

			provided as part of the development.	example, requirement 6 in Schedule 2 to the **Tillbridge Solar Order 2025**); and
	15	Permissive Path	NKDC would be agreeable for the discharging Relevant Planning Authority to be changed to LCC	As the requirement is drafted, there is nothing precluding Lincolnshire County Council (as the relevant planning authority) from consulting with UKHSA on the Battery Safety Management Plan if they consider that necessary.
	16	Soil Management	NKDC suggests that the Relevant Planning Authority is changed to NKDC	**Requirement 8 (Biodiversity Net Gain):**
	18	Decommissioning and Restoration	NKDC suggest that an additional clause is provided for a) how a period of extended outage would be managed (if not dealt with through the management plans) and b) funding for decommissioning both as a result of an extended period of outage and at the end of the lifespan of the development – see also paragraphs 24.31 and 24.32 above.	The Applicant does not consider the proposed drafting change to be necessary. Sub-paragraph (2) of the requirement states that the biodiversity net gain strategy prepared pursuant to the requirement "*must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates*." Paragraph 2.3.8 of the **Outline Landscape and Ecological Management Plan (APP-089) (OLEMP)** commits that the Applicant will 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, calculated using The Statutory Biodiversity Metric published by the Department for Environment, Food and Rural Affairs in July 2024. The requirement does not need to state these percentages again as the commitment is secured through the requirement that the biodiversity net gain strategy be "substantially in accordance" with the **OLEMP**.
	New	Replacement Panels	NKDC suggest an additional Requirement to limit the replacement of panels to the percentage stated in the ES and a	**Requirement 15 (Permissive Path):**

		replacement panel monitoring reporting regime should be agreed with the Relevant Planning Authority	The Applicant notes this comment. Requirement 15 does not contain a mechanism for its discharge. **Requirement 16 (Soil Management):** The Applicant notes this request and notes that NKDC has not provided reasons for why this change is considered necessary. The inclusion of Lincolnshire County Council as the discharging authority for this requirement follows the recent precedent of **The Gate Burton Energy Park Order 2024** and the **Tillbridge Solar Order 2025**. The Applicant has therefore not made any changes to the drafting of Schedule 2 in response to this request but is open to discussing this with LCC and NKDC. **Requirement 18 (Decommissioning and Restoration):** The Applicant does not consider that any change to the drafting of this requirement is necessary. Please refer to the response to paragraph 24.31 above. The Applicant also notes for the avoidance of doubt that this is now requirement 19, not 18. In addition, it is noted that the application contains a **Funding Statement (APP-043)** which complies with requirements for evidencing availability of funding where an application contains compulsory acquisition powers. There is no policy requirement to provide this sort of evidence of funding in respect of non-compulsory acquisition in matters. The possibility of requiring a form of bond or alternative security mechanism to be put in place for decommissioning costs was considered during the Examination of The Mallard Pass Solar Farm Order 2024. The ExA's Recommendation

		Report states at paragraph 7.4.73 that "*Whilst there were suggestions by Interested Parties for provision to be made for a financial bond, consistent with the other made DCO's for solar projects we do not consider this to be necessary given the controls that would already be in place via Requirement 18 [Decommissioning and restoration] of the DCO*". As far as the Applicant is aware, no solar DCO has imposed such a requirement, including the recently granted West Burton Solar Project Order 2025, Heckington Fen Solar Park Order 2025, East Yorkshire Solar Farm Order 2025 and Tillbridge Solar Order 2025. There is nothing about the Proposed Development which would justify a different approach. NPS EN-3 provides a clear policy framework for solar NSIPs, and paragraphs 2.10.65 to 2.10.69 deal with project lifetime and decommissioning. There is no reference within this policy to it being necessary for security to be put in place to cover the costs of decommissioning. Indeed, paragraph 2.10.68 notes that "Solar panels can be decommissioned relatively easily and cheaply". Such a requirement would not meet the policy test within NPS EN-1 paragraph 4.1.16 that requirements should only be imposed that are, inter alia, necessary and reasonable. No such requirement has therefore been included in the draft DCO nor would it be appropriate. **Replacement panels requirement:** The Applicant does not consider this to be necessary for the reasons explained in the response to paragraph 26.2 above.
26.6	d. Schedule 16 Procedure for Discharging Requirements, Article 19-22 No suggested amendments.	The Applicant notes this comment.

26.7	e. Schedule 16 Procedure for Discharging Requirements, Article 23 – Fees The Council considers that the proposed fee structure is overly complicated and would not cover the Council's reasonable costs in discharging Requirements. The Council recommends that the fee structure provided within a number of recent Lincolnshire NSIPs, allowing for a corresponding increase in line with the increase in national planning fees introduced in April 2025, is followed. An example of the most up-to-date fee structure and amounts can be found within the Springwell solar farm draft DCO. The latest version was submitted at Deadline 3, referenced REP 3-005 (schedule 16). The Council has been advised informally by the applicant that they are willing to amend the fee structure and fee amounts to reflect the schedule provided in the Springwell solar farm DCO.	The Applicant has amended the fee structure and fee amounts in paragraph 24 (note in the latest Draft DCO this is now paragraph 24) in Schedule 2 to the **Draft DCO (Document Ref: 3.1)** to reflect the equivalent drafting in the latest version of the Springwell draft DCO.
26.9	The Council would welcome further discussions with the applicant to progress a s106 planning obligation to secure funding for BNG monitoring and the skills and education package and to set up an Ecology Steering Group. With reference to BNG monitoring the Council will provide an indicative BNG monitoring fee based on the broad principles contained in the adopted Central Lincolnshire BNG monitoring fee schedule at part of its Written Representation.	With regards to BNG monitoring, the Applicant notes that paragraph 019 of the Biodiversity net gain Planning Practice Guidance, which can be considered of some relevance to the Proposed Development, states that *"Prior to the determination of the planning application, decision makers will also want to discuss with the applicant whether any section 106 planning obligations are required to secure either significant onsite habitat enhancements or offsite gains for the development."* NKDC have previously notified the Applicant about their preference for BNG monitoring to be secured by way of s106. Please refer to our answer to question GCT.1.11 in the **Applicants Response to ExAs ExQs (Document Ref 9.6)** submitted at this deadline.

26.10	With reference to skills and education funding, the Council would recommend that an annual funding contribution of £50,000, for the lifetime of the development, is made to assist the delivery and implementation of the outline Skills, Supply Chain and Employment Plan (oSSCEP). A similar contribution has been provided by way of a s106 agreement in relation to the Longfield and Heckington Fen solar farms and has been agreed, in principle, as part of the Springwell solar farm examination. The purpose of the funding would be help support the initiatives identified within the oSSCEP such as the implementation and provision of apprenticeships, training workshops, bursaries, courses and qualifications.	Please refer to our answer to question GCT.1.11 in the **Applicants Response to ExAs ExQs (Document Ref 9.6)** submitted at this deadline.
26.11	With reference to the formation of an Ecological Steering Group, the Council, alongside LCC, would welcome the formation of such a group to, amongst other things, monitor progress of the oLEMP and to consider and recommend remedial measures where objectives are not being met, especially in the initial years of establishment. The group would enable cross-referencing with other large scale solar farms where similar species or habitats are impacted, or mitigation is being provided. Such a group has been provided by way of a s106 agreement as part of the consent for the Outer Dowsing Offshore Wind (Generating Station). The Council sees the benefit of such a group given the large number and clustered nature of solar farms and associated BESSs that have recently been proposed or approved within North Kesteven.	The Applicant notes NKDCs desire for a s106 to cover an ecology steering group and refers to our answer to question GCT.1.11 in the **Applicants Response to ExAs ExQs (Document Ref 9.6)** submitted at this deadline.

4. Applicant's Comments on Boston Borough Council's Local Impact Report (REP1-059)

Table 4.1 – Applicant's Comments on Boston Borough Council's Local Impact Report (REP1-059)

PARA NO.	LIR TEXT	APPLICANT'S RESPONSE
Introduction		
Section 1	Please refer to BBC LIR Section 1.	This section has been reviewed and the Applicant has no comments to make.
Description of the Area		
Section 2	Please refer to BBC LIR Section 2.	This section has been reviewed and the Applicant has no comments to make.
Local Planning Policy Context		
Section 3	Please refer to BBC LIR Section 3.	This section has been reviewed and the Applicant has no comments to make.
Summary of the Proposed Development		
Section 4	Please refer to BBC LIR Section 4.	This section has been reviewed and the Applicant has no comments to make.
Local Impacts **Overarching Comments and Principle of Development**		
5.1.1	It is acknowledged that the Project would make a significant contribution to the provision of renewable energy, however, there are number of matters of significant	The Applicant notes this comment. Mitigation, enhancement and compensation proposals are outlined in the **Environmental Statement ('ES') (APP-050 to APP-069)**

	concern that are presented within this LIR. Therefore, it is crucial that essential mitigation, enhancement, and compensation is in place to ensure that the Project leaves a positive lasting legacy within the Borough.	with mitigation measures summarised within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)**) and secured through relevant control documents referenced in requirements.
5.1.2	The principle for the solar array site will be considered against national policy and the policy of the Central Lincolnshire Local Plan, which is the Local Plan for NKDC. It is the relevant local plan for the site of the solar array.	Noted. The **Planning Statement ('PS') (APP-277)** considers the principle for the proposed development against national policy and local policy, including the Central Lincolnshire Local Plan (2018-2040).
5.1.3	The cable route and extension to the Bicker Fen Substation lies within Boston Borough and the issues will be considered against national policy and Policy 31: Climate Change and Renewable and Low Carbon Energy of the SELLP (See Appendix A), which is the Local Plan for Boston Borough.	The **Planning Statement ('PS') (APP-277)** considers the Cable Route and extension to the Bicker Fen Substation against principal policy (the National Policy Statements) as well as other national policy and the South East Lincolnshire Local Plan (2011-2036), including Policy 31.
5.1.4	Policy 31 of the SELLP is split into two parts, A: climate change and B: renewable energy. Part B states that with the exception of wind energy the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies on existing or proposed structures will be permitted provided individually or cumulatively they would not cause significant harm to the following; visual amenity, landscape character or quality, residential amenity, highway safety, agricultural land take, aviation and radar safety, heritage assets and the natural environment.	The Applicant notes this comment. Environmental factors are assessed and mitigated within the **Environmental Statement ('ES') (APP-050 to APP-069)** with mitigation measures summarised within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)**).

5.1.5	In the context of Policy 31 Part B the principle of development is therefore reliant upon whether individually or cumulatively the Project would not cause significant harm to the following: visual amenity, landscape character or quality, residential amenity, highway safety, agricultural land take, aviation and radar safety, heritage assets and the natural environment. Therefore, the proposed mitigation of adverse effects is an important consideration.	The Applicant notes this comment. The effects on environmental factors are assessed and mitigated within the **Environmental Statement ('ES') (APP-050 to APP-070).**
5.1.6	In this regard BBC and other stakeholders must have confidence that the commitments and mitigation measures proposed by the Applicant to reduce the adverse effects presented, are secured sufficiently with the control documents and dDCO.	The Applicant notes this comment. The commitments and mitigation measures are outlined in the **ES (APP-050 to APP-069)** and mitigation measures summarised within Section 19.2 Additional Mitigation of **ES Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **ES Appendix 2.3 Embedded Mitigation (APP-076)** are to be secured by the **Draft Development Consent Order ('Draft DCO') (Document Ref: 3.1)**.
5.1.7	The Project offers significant positive impacts in terms of the production of clean renewable energy and the transition and movements towards Net Zero, but it must be demonstrated that there are no significant adverse environmental impacts that cannot be appropriately managed or mitigated through the DCO process.	The Effects on environmental factors are assessed and mitigated within the **Environmental Statement ('ES') (APP-050 to APP-070)** with mitigation measures summarised within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)**). The Applicant notes the position set out, and observes that the decision-making framework under Section 104 of the PA 2008 does not require that any and all impacts are avoided. National Policy Statements are the principal policy applicable and its policies acknowledge the potential for residual effects to remain after the application of mitigation. One example is NPS EN-1 which acknowledges at

		paragraph 5.10.5 that 'virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape'. Section 6.2 of the **PS (APP-277)** further outlines that certain residual effects remaining after the application of mitigation are outweighed by important and relevant considerations relating to the benefits and need for the Proposed Development. This is through the Proposed Development being identified as of Critical National Priority ('CNP') as shown in paragraph 4.2.5 of EN-1. The Applicant has sought to avoid, minimise and compensate for impacts where possible having regard to the purpose of the nationally significant infrastructure.
5.1.8	The sections below consider the potential impacts of the development upon agricultural land, landscape and visual effects, ecological effects, socio economic impacts, cultural heritage, air quality, noise and vibration and effects of Construction including Cumulative Impacts which the Examining Authority will need to balance these positive impacts against any negative impacts identified within this LIR.	The potential impacts of the Proposed Development are assessed within the **ES (APP-050 to APP-070)** with mitigation measures outlined within **Appendix 2.3 Embedded Mitigation (APP-076)** aimed to address any negative impacts identified.
Agricultural Land		
5.2.1	Policy 31 of the SELLP is split into two parts, A: climate change and B: renewable energy. Part B states that with the exception of wind energy the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies on existing or proposed structures will be permitted provided individually or cumulatively they would not cause significant harm to the following; visual amenity, landscape character or quality, residential amenity, highway safety, agricultural	This statement is noted by the Applicant. Within **Chapter 14 Soils and Agricultural Land (APP-065)**, Section 14.12 considers the potential inter-cumulative effects, with Table 14.15 Cumulative Effects Assessment of Developments setting out the baseline conditions relevant to the projects within the Lincolnshire County Council administrative boundary considered to have the potential for a cumulative effect with the Proposed Development in

land take, aviation and radar safety, heritage assets and the natural environment.	accordance with the scope set out within **Chapter 4 Scope and Methodology (APP-055).** In relation to the loss of agricultural land, paragraph 14.13.35 states that "*When considering the impact of all considered developments (within Table 14.15) across the Lincolnshire County Council administrative area, 2% (11,962.85 ha) of all the agricultural land is involved of which 0.82% is (4,927 ha) BMV land. The majority of the considered developments are solar developments where most of the land take may be considered temporary and reversible, with the permanent land take limited to areas of built development. Assuming that the embedded mitigation allows for reinstating these sites to agricultural production and that the soil resources are protected during all phases of the developments, the inter-cumulative impact is deemed to be Moderate (Significant)*". As stated in paragraph 14.7.2 of **Chapter 14 Soils and Agricultural Land (APP-065),** During the construction phase, all land within the Solar Array Area will be removed from agricultural production. However, the temporary nature of the solar arrays means that the land take is not all permanent, and the land-take associated with the solar arrays can be returned to agriculture after decommissioning. In respect of the Cable Route Corridor, paragraph 14.8.4 of **Chapter 14 Soils and Agricultural Land (APP-065)** states that, ***"****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. Construction compounds will cover approximately 13.71 ha of land within the Cable Route Corridor. However, given that*

these 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".

Paragraph 14.9.3 of **Chapter 14 Soils and Agricultural Land (APP-065)** states that ***"t**he removal of 18.91 ha of land within the Bespoke Access Corridor from agricultural production during the construction phase is expected to be a temporary impact as following construction of the Bespoke Access Road the surrounding land can be reinstated to agricultural use (or its predevelopment use). As a worst-case assessment, the 3.98 ha of 'hard development' where the Bespoke Access Road is sited has been assessed as 'permanent' loss of BMV land and associated soil', consistent with the approach taken for areas of built infrastructure within the Solar Array Area. Therefore, the magnitude of change is assessed as being Low*".

The areas of permanent land take for the Proposed Development have been calculated based on a conservative worst case scenario approach and total 29.99 ha across the Solar Array Area, Cable Route Corridor and Bespoke Access Road. This is above the 20 ha threshold denoted for there being a high magnitude of impact. The estimates for the permanent land take are conservative worst case and include the access road at a width that is likely to be reduced, construction compounds that will be removed during the operational phase and access tracks that will be removed during operation or are already in place as part of the existing farm infrastructure. The values also include part of the substation extension area that has already been consented by Heckington Fen (2.4 ha). Accounting for this,

only an additional 0.3 ha will be required for the Proposed Development's generation bay. The removal of these temporary design elements from the permanent land take values and the reduction in land for the substation extension could mean in reality that the total land take of BMV land falls below the 20 ha threshold for high magnitude of impact.

Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013 to REP1-014) includes measures to ensure the protection of agricultural land and soils and includes requirements for ongoing monitoring of the site. Details of site restoration requirements are also provided. The oSMP will ensure the soils stripped within areas assessed as being permanent land take will be protected and ensure their suitability for use during restoration of those areas back to agricultural use.

The oSMP is to be progressed into a detailed SMP at the detailed design stage; the detailed SMP is secured by the mechanism set out in requirement 16 of Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. This requirement stipulates that no part of the authorised development may commence until a soil management plan (substantially in accordance with the oSMP **(REP1-013)**) for that part has been submitted to and approved by the relevant planning authority. All construction works must be carried out in accordance with the approved soil management plan and maintained throughout the operation of the relevant part of the authorised development to which the plan relates. The requirement also stipulates that detailed soil management plans must be submitted prior to the date of final commissioning (relating to the operational phase of the authorised development) and prior to the start of any decommissioning works for any part of the authorised

		development (relating to the decommissioning phase of the authorised development). These follow up plans must also be substantially in accordance with the oSMP **(REP1-013).**
5.2.2	The ES contains Chapter 14 on land use and agricultural land (APP-065) and the ES identifies significant adverse effects from the loss of best and most versatile agricultural land (for the whole development across NKDC and BBC).	This statement has been reviewed and is noted by the Applicant. The finding of Significant Effects is found during the construction stage of the Proposed Development and in large part those effects are reversible at the decommissioning stage. Please refer to the response provided in 5.2.1 regarding the breakdown of BMV agricultural land loss across the three components of the development and how the majority of the land take is temporary and reversible. The inclusion of soil protection measures within the oSMP **Appendix 14.4 outline Soil Management Plan (oSMP) (REP1-013)** will ensure the restoration to agricultural land is achievable. The oSMP sets out measures that will ensure the soils stripped within areas assessed as being permanent land take will be protected and ensure their suitability for use during restoration of those areas back to agricultural use. These areas have been assessed as resulting in permanent land take as a conservative worst case scenario, however, it is likely that the agricultural land within these areas will be returned to agricultural use through restoration using the stored soils.
5.2.3	The ES identifies the permanent loss of 2.7 hectares of BMVAL as a result of the construction of the extension to the substation and the cable sealing end. The ES	This statement has been reviewed and is noted by the Applicant.

	considers the cable route as a temporary loss and the outline soil management plan is proposed as mitigation.	Of the approximately 2.7 ha of BMV agricultural land required for the extension works at Bicker Fen substation, 2.4 ha have already been consented within the Heckington Fen DCO. The Proposed Development is subsequently seeking to consent an additional area of approximately 0.3 ha for the generation bay required for this project.
5.2.4	Requirement 16 of the draft DCO relates to the soil management plan, which will be substantially in accordance with the outline soil management plan (APP-176). The soil management plan will be discharged by BBC and NKDC respectively.	This statement has been reviewed and is noted by the Applicant. While this refers to SMP singular, the requirement provides that three plans must be prepared, each dealing with a different stage of the Proposed Development.
5.2.5	The ALC map suggests Grades 1 and 2 land for the southern extent of the Cable Corridor and the Extension to the Substation and Cable sealing end within the Borough. For the purposes of the ES The Applicant has made assumptions that the land is the highest Grade of Agricultural Land.	This statement has been reviewed and is noted by the Applicant.
5.2.6	Unlike the Solar Array site no soil survey has been carried out for the cable corridor or the Bicker Fen Substation extension site to determine the Grade of Agricultural Land (ES Chapter 14 (APP-065) confirms this at paragraph 14.4.7). Albeit paragraph 14.6.8 of the same ES chapter confirms a detailed soil survey of the cable corridor will be carried out pre-construction.	As set out in **Chapter 14 Soils and Agricultural Land (APP-065)**, with the embedded mitigation measures (detailed within **Appendix 2.3 Embedded Mitigation (APP-076)** in place, 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 cable installation over a 12 to 24 month period (see paragraph 1.8.14 of **Appendix 2.1 Grid Connection Construction Method Statement (APP-074)),** these have been assessed as being short term and temporary impacts, unlike the Solar Array Area compounds

		which will be required for a longer period of time (albeit not permanently). As such, it is considered unnecessary and disproportionate to undertake Agricultural Land Classification (ALC) surveys along the Cable Route Corridor pre-consent. However, ALC surveys will be undertaken pre-construction, which will inform detailed Soil Management Plan (SMP). The **Outline Soil Management Plan (oSMP) (REP1-013)** will be progressed into the detailed SMP at the detailed design stage; the detailed SMP is secured by the mechanism set out in requirement 16 of Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. This requirement stipulates that no part of the authorised development may commence until a soil management plan (substantially in accordance with the **oSMP (REP1-013)**) for that part has been submitted to and approved by the relevant planning authority. Paragraph 1.2.24 of the oSMP states that *"A soil survey of the Cable Route Corridor will be carried out pre-construction to provide soil data to inform the detailed SMP."* Therefore, the requirement to survey the Cable Route Corridor is secured via the **Draft DCO (Document Ref: 3.1)**.
5.2.7	Loss of high grade BMVAL is a concern to BBC. The ES identifies the loss of BMVAL as significant adverse effect which the Borough agree with. BBC questions how the use of BMVAL has been minimised in relation to the Substation extension site and the southern extent of the cable corridor without detailed soil surveys. ALC survey is required including cable corridor and substation extension site, to inform avoidance/minimisation and reinstatement.	The Cable Route Corridor has been designed wider than the working width for the cable installation to allow for routing to factor in the various planning, environmental and technical constraints that need to be considered. With regards to Best and Most Versatile (BMV) land specifically, the results of the Cable Route Corridor Agricultural Land Classification (ALC) survey, which will be carried out pre-construction, will identify the grading of the land. All environmental 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 National Policy Statement (NPS) policy (paragraphs 5.11.12 and 6.11.34 of EN-1 and paragraph 2.10.29-32 of EN-3). Within the larger construction compound areas, while the location of these are fixed, lower quality land will be used for the siting of design features involving soil disturbance, where possible and proportionate. The location of the Bicker Fen substation extension has been determined by NGET in accordance with their requirements and constraints for construction and therefore ALC survey data cannot be used to inform the design and location. It should be noted that the majority of this extension area (2.4 ha) has already been consented through the Heckington Fen DCO.
5.2.8	BBC supports Natural England's advice that the 'Applicant to update the oSMP to make clear commitment to restoring the original ALC grade of all restored agricultural land' and 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.'	Following decommissioning, the soils will be reinstated to match the baseline soil profile characteristics of soil type, horizon depth and soil structure. As stated in the response to RR-015 of the **Applicant Responses to Relevant Representations (REP1-029)**, the resulting Agricultural Land Classification (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 over a 40 year period. 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. The **Outline Soil Management Plan (oSMP) (REP1-013)** contains measures relating to soil protection and management, and will be progressed into the detailed SMP at the detailed design stage; the detailed SMP is secured by the mechanism set out in requirement 16 of Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. This requirement stipulates that no part of the authorised development may commence until a soil management plan (substantially in accordance with the **oSMP (REP1-013)**) for that part has been submitted to and approved by the relevant planning authority.
5.2.9	Even with this commitment to ensure that agricultural land is restored to the original ALC grade there will be a temporary impact on agriculture and soils that will result in the temporary loss of agricultural production in the cable corridor area generally mostly very good and excellent quality agricultural land.	This statement has been reviewed and is noted by the Applicant.
5.2.10	The proposed development is likely to have a mainly temporary impact on agriculture and soils that will result in the temporary loss of agricultural production in the cable corridor area generally mostly very good and excellent quality agricultural land.	This statement has been reviewed and is noted by the Applicant.
5.2.11	There will also be the permanent loss of agricultural land from production from assumed excellent quality agricultural land (no ALC Survey has been carried out to determine the Grade of Agricultural Land lost) as a result of the extension to the existing Bicker Fen Substation.	This statement has been reviewed and is noted by the Applicant. The quality of the land has been assumed to be the highest grade (Very High sensitivity) as a worst case scenario as part of the assessment in **Chapter 14 Soils and**

		Agricultural Land (APP-065) – please see paragraph 14.8.3. Please also refer to the response provided against paragraph 5.2.7 regarding the loss of land from the extension of the Bicker Fen Substation and the constraints around its location.
5.2.12	There are therefore potential negative effects from the permanent loss of Best and Most Versatile Agricultural Land of approximately 2.7 hectares and temporary impact on agriculture and soils that will result in the temporary loss of agricultural production.	This statement has been reviewed and is noted by the Applicant. Please also refer to the response provided against paragraph 5.2.7 regarding the loss of land from the extension of the Bicker Fen Substation and the constraints around its location. It should also be noted that the Bicker Fen extension is contained wholly within NGET's non-operational land which is already subject to multiple easement restrictions from various constructed schemes and could not be used for agricultural uses even without the existence of the Proposed Development. With regard to the rest of the Proposed Development, as outlined in Sections 6.6 and 7.6 of the **Planning Statement (APP-277)**, whilst there are some residual significant adverse impacts from the Proposed Development, it is considered that the Applicant has provided substantial and appropriate mitigation and that residual impacts are outweighed by material considerations in the form of the benefits and need for the Proposed Development.
	Landscape and Visual	

5.3.1	**Local Planning Policy** The SELLP does not have a single policy that considers this issue. However, Policy 2: Development Management (See Appendix A), Policy 3: Design of New Development (See Appendix A) and Policy 31: Climate Change and Renewable and Low Carbon Energy (See Appendix A) do refer to elements of the proposal that impact landscape and visual impacts i.e. size, scale, layout, density, orientation, design, improving the character and quality of an area, protecting or incorporating existing built assets and green infrastructure.	Appendix 4C of the **Planning Statement (APP-277)** outlines how the Proposed Development is compliant with the local policies outlined. The scale of permanent infrastructure associated with the Bicker Fen Substation extension will be proportionate to the scale of existing development, including the existing Bicker Fen Substation, overhead line infrastructure and adjacent large scale renewable energy development. In relation to this development context, the Proposed Development will not appear as a dominant structure(s). Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** (both secured by the **Draft DCO (Document Ref: 3.1)**), and **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (this is secured in requirement 7 of the **Draft DCO (Document Ref: 3.1)**)) detail the mitigation measures proposed in respect of landscape and visual. **Figure 6.32 Vegetation Removal Plan (REP1-015) (**updated and resubmitted at Deadline 1) illustrates the extent of existing vegetation that will be retained to provide a degree of visual assimilation.
5.3.2	**ES Significant Effects** The ES contains Chapter 6 on Landscape and Visual Effects (APP-057). The ES finds a Significant Adverse Landscape Effects within the Borough to: • the Holland Reclaimed Fens Landscape Character Area. • at Residential properties 10, 11, 12, 13, 14, & 15.	This statement has been reviewed and is noted by the Applicant, and agrees with the summary of the findings of **Chapter 6 Landscape and Visual Effects (APP-057)** relating to the identification of Significant adverse effects within the administrative boundaries of Boston Borough Council but notes that these are temporary and limited to the construction phase.

	• The ES contains Chapter 6 on Landscape and Visual Effects (APP-057). The ES finds a Significant Adverse Landscape Effects within the Borough to: • the Holland Reclaimed Fens Landscape Character Area. • at Residential properties 10, 11, 12, 13, 14, & 15. Requirement 7 of the dDCO relates to the landscape ecological management plan (LEMP), which will be substantially in accordance with the outline landscape ecological management plan. The LEMP will be discharged by BBC and NKDC respectively.	
5.3.3	**Baseline** The surrounding land falls with National Character Area 46 'The Fens' and Landscape Character Area Holland Reclaimed Fens that adjoins the Wash Saltmarshes Landscape Character Area within the Borough.	This statement has been reviewed and is noted by the Applicant and the Applicant agrees with the landscape character context stated.
5.3.4	Visual Receptors include Residential Properties are within 250 metres, 1km and 2 km of the Order Limits. These are Groups R10, R11, R12 and R15g at 250 metres, 13a, 14b, 14c, 15 a to f and 16a to 16e at 1km and at 2 km 13b and 14a. PROW Bick 1/1 and Bick 2/1 are in close proximity to the order limits.	This statement has been reviewed and the Applicant Agrees with this summary of visual receptors.
5.3.5	**Landscape and Visual Effect from the extension to the Bicker Fen Substation** BBC are concerned regarding the landscape and visual effect of the extension to the Bicker Fen Substation. Both the AIS and GIS Design options are 15 metres high as is the cable sealing end. Plantation Removal Plan ST 19595-381 REV1 shows the removal of:	**ES Chapter 6 Landscape and Visual (APP-057)** reports significant visual effects as a result of close to middle distance views of construction activity associated with the Bicker Fen Substation extension. Upon completion of the construction phase, the presence of the Bicker Fen Substation will be visible but perceived in relation to the

	• 0.71 ha of woodland and grassland/scrub to the South of the Substation. • 0.29 ha of grassland/scrub to the west of the substation • 0.76 ha of grassland/semi-improved grassland to the south of the Substation and • A line of trees totalling 0.17 ha to the south of the substation The embedded mitigation is Design, OLEMP, OCEMP and ODEMP. There is no additional mitigation or a Landscape Strategy Plan for the extension to the Substation. The OLEMP mentions no mitigation just summarises the removal, the retention of a line of trees and what the effect is.	context of the existing substation and associated large scale energy infrastructure in views. The location and extent of the Bicker Fen Substation extension works is subject to NGET's detailed design process, and the precise extent and locations of vegetation removal will, therefore, be confirmed at that stage. As such, the extent of vegetation indicated represents a 'worst-case' scenario to provide flexibility as set out in paragraph 2.4.5 of the **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (this is secured in requirement 7 of the **Draft DCO (Document Ref: 3.1)**). 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**. 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) (REP1-009 to REP1-010)** which is secured in requirement 12 of the **Draft DCO (Document Ref: 3.1)** and the **Appendix 6.7 oLEMP (APP-089)** which is secured in requirement 7 of the **Draft DCO (Document Ref: 3.1)**. A line of mature vegetation, within the highway boundary, will be retained along the southern boundary of the Bicker Fen Substation extension to provide partial screening / filtering of views as perceived from receptors to the south-west, south and south-east of the Bicker Fen Substation.
5.3.6	The Work Plans show areas for BNG, landscaping and drainage to the north east and the north west but not the South West where the extension to the Substation is	The **Vegetation Removal Plan (REP1-015)** shows the specific vegetation which will be retained to the south west of the substation. This embedded mitigation has been

	proposed. There is no detail as what work number 5E in this location is meant to be i.e. BNG, Landscaping or drainage work nor is there any details on any proposals even if they would be illustrative at this stage.	considered by the Applicant in its assessment of landscape and visual effects (as reported in **Chapter 6 Landscape and Visual Effects (APP-057)**) and it has been concluded that such embedded mitigation would be sufficient to mitigate the impacts of works at the substation. Notwithstanding the Applicant's position that no further landscaping mitigation would be required in the south west corner of the substation land, the Applicant will continue to engage constructively with Boston Borough Council in relation to the provision of appropriate enhancement measures that may be possible, subject to detailed design work to be carried out by National Grid. The Applicant has contacted Boston Borough Council to arrange a meeting to discuss vegetation removal, landscape and visual effects and whether any further enhancement measures may be possible.
5.3.7	There is therefore currently no mitigation plans for the landscape and visual effects of the extension to the Substation. Mitigation measures should be included either through site specific measures or via contributions secured via S106 Agreement.	The Applicant will continue to engage constructively with Boston Borough Council in relation to the provision of appropriate measures. The mitigation proposed addresses effects identified to the extent possible within the operational and land constraints present. With regard to this, the Applicant will contact Boston Borough Council to arrange a meeting to discuss vegetation removal, landscape and visual effects and whether any further measures may be appropriate and how these might be secured. The Applicant sets out its current position in regards S106 and requests for S106 from HLAs, in response to the Examining Authority's written question GCT.1.11. The Applicant's Responses to the ExAs ExQ1 document is submitted at the same deadline and has the document reference 9.6.

5.3.8	**Landscape and Visual Effect to Sensitive Receptors** Mitigation of Visual Effects to sensitive receptors Residential Properties (R10, 11, 12, 13,14 & 15) and PROW (Bick 2/1) is in the form of retention of existing vegetation and replacement within 2 years of vegetation removed within the cable corridor. The sensitive receptors Residential Properties are all outside of the Order Limits also so the Borough Council question how such a retention is controlled and whether in fact this is effective mitigation.	The retention of existing vegetation refers to vegetation within the Cable Route Corridor which will be retained in accordance with the measures set out in **Appendix 6.7 Outline Landscape and Ecological Management Plan (oLEMP) (APP-089)** (this is secured in requirement 7 of the **Draft DCO (Document Ref: 3.1)**). Details of the assumptions regarding the maximum extent of vegetation removal in this corridor and specifically in relation to the Bicker Fen Substation is provided in the **oLEMP** (Paragraphs 2.4.7 to 2.4.11). This provides the assurance that, although all of the vegetation within the Cable Route Corridor is identified as being potentially removed, the maximum extent of removal for any vegetation is 30m for the installation of the Cable Route (see paragraph 2.4.6 of the oLEMP).
5.3.9	**Loss of Landscape Features** BBC also seek clarity on the loss of landscape features in order to clarify whether losses are adequately justified and mitigated against. BBC's raises matters of clarification as follows: • Vegetation Removal at the extension to Bicker Fen Substation- Vegetation Removal Plan 6.4.43c Fig 6.32 doesn't clearly show the same vegetation removed as above. The Applicant should provide clarification on Vegetation Removal Plans for the extension to Bicker Fen Substation i.e. potential to remove all the vegetation within the Order Limits associated with the Bicker Substation. • Vegetation Removal at South Forty Foot Drain a LWS -Vegetation Removal Plan 6.4.43c Fig 6.32	**Figure 6.32 Vegetation Removal Plan (REP1-015)** has been updated and resubmitted at Deadline 1. The updated plan demonstrates the extent of potential vegetation removal within the within the Cable Route Corridor. The plan provides an indication of the extent of 'vegetation to be potentially removed to provide design flexibility for this linear element. Details of the assumptions regarding the maximum extent of vegetation removal in this corridor and, specifically, in relation to the Bicker Fen Substation is provided within Paragraphs 2.4.6 to 2.4.11 of **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089) (oLEMP)** (this is secured in requirement 7 of the **Draft DCO (Document Ref: 3.1)**). The **oLEMP** identifies specific areas of vegetation that can be retained and includes large areas of existing vegetation to the south-eastern and north-eastern boundaries of the

	(APP-237) appears to show the removal of all vegetation within the LWS South Forty Foot Drain when HDD crossing is Proposed. The Applicant should provide Clarification on Vegetation Removal Plans for South Forty Foot Drain as the Borough Council are not why there is the need to show potential removal when the crossing method is committed as HDD trenchless crossing.	substation area that will be retained and protected. Notably, this will include the extensive woodland to the east (W1006) and to the north (W1007 and W1008). The updated and resubmitted **Figure 6.32 Vegetation Removal Plan (REP1-015)** illustrates that the vegetation associated with the South Forty Foot Drain will be retained because there is a commitment to the use of trenchless methods to install the cable such as Horizontal Directional Drilling (HDD) at sensitive locations including the South Forty Foot Drain. This is also illustrated in **Figure 11.6 Watercourse Crossings (APP-262)**).
5.3.10	**Conclusions** There are therefore potential negative effects from the Landscape and Visual Effect of the extension to the Bicker Fen Substation and the construction of the cable corridor. The Borough Council are also not clear on the loss of landscape features and whether losses are adequately justified and mitigated against.	The Landscape and Visual Impact Assessment (LVIA) within **Chapter 6 Landscape and Visual (APP-057)** of the Environmental Statement reports that significant adverse landscape and visual effects arising from the installation of the Cable Route and Bicker Fen Substation extension would be experienced at the construction phase, only. Residual operation phase effects would be experienced as a result of the presence of the Bicker Fen Substation extension, but these would be Not Significant. The updated and resubmitted **Figure 6.32 Vegetation Removal Plan (REP1-015)** illustrates the extent of potential vegetation removal and retention.
	Ecology	
5.4.1	**Local Planning Policy** The SELLP contains Policy 28: The Natural Environment (See Appendix A). This includes internationally and nationally designated sites such as the Wash SPA, SAC, Ramsar and SSSI designations. It also contains locally designated sites, Local Wildlife Sites and Local Nature	This statement has been reviewed and is noted by the Applicant.

	Reserves. The policy also seeks to increase biodiversity on site as a result of development and to address gaps in the ecological network.	
5.4.2	**ES Significant Effects** The ES contains Chapter 7 on Ecology (APP-058) and a Shadow HRA (APP-050) to inform Appropriate Assessment has also been prepared. The ES identifies no significant residual effects upon ecology in the Borough. Requirement 7 of the dDCO relates to the landscape ecological management plan (LEMP), which will be substantially in accordance with the outline landscape ecological management plan. The LEMP will be discharged by BBC and NKDC respectively.	This statement has been reviewed and is noted by the Applicant. As stated within Requirement 7(1) of the **Draft DCO (Document Ref: 3.1)**, "*No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*".
5.4.3	**Baseline** Within the Borough the South Forty Foot Drain is a LWS that the Cable Corridor crosses as it enters the Borough.	This statement has been reviewed and is noted by the Applicant.
5.4.4	**Biodiversity Net Gain** BBC welcomes the Applicants commitment to BNG, in the Biodiversity Net Gain Strategy (APP-280) particularly as BNG is not yet a mandatory requirement for NSIPs. However, none of that BNG benefits the Borough as all of the measures are outside of its administrative area.	The Applicant has developed the **Biodiversity Net Gain (BNG) strategy (APP-280)** that is to be included as a mechanism set out in requirement 8 of the **Draft DCO (Document Ref: 3.1)**, based on a landscape approach; where possible, increasing connectivity for biodiversity over the area. The BNG process mandates that the habitats must be managed for 30 years. As the land within Boston Borough Council (BBC) remains under the control of the landowner (and the majority will return to working fields after the cabling is installed), it will not be possible to guarantee enhanced habitats to meet BNG requirements. The Applicant is committed to delivering BNG within the Solar Array Area, which it will be in control of for more than 30 years post construction. The Applicant is looking to set up a meeting

		with BBC to discuss site specific measures at the extension of the substation and does not believe a s106 agreement will be required. Further, 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 to discuss approaches to provide greater biodiversity gains within the region. We understand this would meet once or twice per year but would need to understand heads of terms proposed.
5.4.5	**Impact upon South Forty Foot Drain** Vegetation Removal Plan 6.4.43c Fig 6.32 shows all vegetation removed (potentially) despite the crossing being confirmed as HDD. BBC are concerned that if there is potential to remove all the vegetation within the LWS then the Applicants confirmed use of the HDD trenchless crossing to cross the South Forty Foot Drain may not be as fixed as the ES suggests.	The Applicant can confirm that the crossing at the South Forty Foot Drain will be crossed using trenchless techniques such as HDD, therefore, the LWS will not be impacted. **Figure 6.32 Vegetation Removal Plan (REP1-015**) was updated to clarify this and resubmitted at Deadline 1
5.4.6	There is therefore concern that the 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 is uncertain and maybe worse if all the vegetation was removed and the crossing technique changed.	As above, **Figure 6.32 Vegetation Removal Plan (REP1-015**) was updated and resubmitted at Deadline 1 to clarify that vegetation will be retained.
5.4.7	**Conclusion** There are therefore potential negative effects from the ecological/BNG effects of the extension to the Bicker Fen Substation and the construction of the cable corridor.	The **Ecology Chapter (APP-058)** identified no significant residual adverse effects along the Cable Route Corridor. Trenchless methods for crossing the South Forty Foot Drain are included within Sections 2.8.2 to 2.8.3 of the outline Construction Environmental Management Plan (**oCEMP) (REP1-009 to REP1-010)** secured through requirement 12

		of the **Draft DCO (Document Ref: 3.1)**. **Figure 6.32 Vegetation Removal Plan (REP1-015**) has been updated and was resubmitted at Deadline 1 to show that vegetation will be retained at the South Forty Foot Drain. The Applicant notes that, owing to the BNG requirement for long-term maintenance of habitats (as detailed in our answer to Comment 5.4.4 above), it is not possible to deliver net gain within the boundary of Boston Borough Council (BBC). However, with the exception of some habitat loss around the substation at Bicker Fen where there is no scope for replacement, the habitats along the Cable Route Corridor will be replaced and there will be no net biodiversity change along the route. The **Biodiversity Net Gain Strategy (APP-280)** that is to be secured by requirement 8 of the **Draft DCO (Document Ref: 3.1)**, sets out how the project overall will deliver BNG.
	Socio-Economics	
5.5.1	**Local Planning Policy** The SELLP does not have a single policy that considers this issue. However, Policy 31: Climate Change and Renewable and Low Carbon Energy (See Appendix A) does relate to this issue in part owing to it supporting renewable energy development. As a consequence, it encourages economic activity through the construction of such schemes and with its links to mitigating climate change ameliorates societal impact.	This statement has been reviewed and is noted by the Applicant; no response required.
5.5.2	**ES Significant Effects** The ES contains Chapter 7 on Socio Economics (APP-066). The ES identifies moderate beneficial effects	This statement has been reviewed and is noted by the Applicant; no response required.

	(significant) to the Borough upon generation of employment and GVA during construction. Requirement 17 of the dDCO relates to the skills supply chain and employment plan, which will be substantially in accordance with the outline skills supply chain and employment plan (APP-179). The skills, supply chain and employment plan will be discharged by BBC and NKDC respectively.	
5.5.3	**Socio Economic Benefits** BBC welcomes the OESP but are uncertain about how the overarching positive impacts will benefit members of the local community within the BBC area.	This statement has been reviewed and is noted by the Applicant. As set out in Appendix 15.3: Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179), the social Area of Influence (AOI) of the OSSCEP includes Boston Borough. Thus, the measures included within **Appendix 15.3: Outline Skills, Supply Chain and Employment Plan (OSSCEP) (APP-179)**, that is to be included as a mechanism set out in requirement 17 of the **Draft DCO (Document Ref: 3.1)**, will apply to residents within Boston Borough. Such measures include support for training, local supply chain enhancement, development of partnerships with local education institutes and employers. Boston Borough will be a key target for all initiatives. Such initiatives are mainly: prioritising local employment and local procurement and potential upskilling of local residents through apprenticeships and partnerships with local educational institutions. Section 1.5 of the document includes OSSCEP partners and stakeholders in the AoI for these initiatives. Identified partners in Boston include: Boston College, Haven High Academy and Bridge House Independent School in Boston (secondary schools), Boston Job centre and MA Labour in Boston, among others. To best tailor the outlined initiatives to local realities, the detailed

		SSCEP will be discussed with the Local Planning Authority's economic development team before being finalised.
5.5.4	BBC are also concerned regarding the impact upon the agricultural sector in terms of the impact on agriculture and soils that will result in the temporary loss of agricultural production.	See response provided for 5.2.7 regarding the loss of land from the extension of the Bicker Fen Substation and the constraints around its location. It should also be noted that the Bicker Fen extension is contained wholly within NGET's non-operational land which is already subject to multiple easement restrictions from various constructed schemes and could not be used for agricultural uses while the Bicker Fen substation is functional, even without the Proposed Development's existence. With regard to the rest of the Proposed Development, as outlined in Sections 6.6 and 7.6 of the **PS (APP-277)**, whilst there are some residual significant adverse impacts from the Proposed Development, it is considered that the Applicant has provided substantial and appropriate mitigation and that residual impacts are outweighed by material considerations in the form of the benefits and need for the Proposed Development. This statement has been reviewed and is noted by the Applicant. It should be noted that the cessation of intensive farm management at (the Solar Array Area of) the Site for the duration of the life of the Proposed Development and a switch to a lower intensity grass based system will provide additional benefits to the soils within the Site, as stated in paragraph 14.7.18 of **Chapter 14 Soils and Agricultural Land (APP-065)** of the Environmental Statement (ES) "*The soils will provide other ecosystem services during the*

		operational phase including for biodiversity and carbon storage due to the lower intensity land management strategies that will be adopted during operation" This allows the soils to remain functional over the 40-year operation phase and soil quality within these areas may in fact be improved in terms of organic matter content (carbon storage) resulting in positive effects on soil quality indicators, allowing for the agricultural potential to be retained. This will help secure increased future cropping potential and value of the fields.
5.5.5	**Conclusions** There are therefore potential neutral effects from the socio-economic effects of the extension to the Bicker Fen Substation and the construction of the cable corridor.	This statement has been reviewed and is noted by the Applicant; no response required.
	Air Quality	
5.6.1	**Local Planning Policy** The SELLP contains Policy 30: Pollution which considers air quality as well as other issues including fumes and odour, light levels and noise and vibration. Policy 30 states that Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon: health and safety of the public; the amenities of the area; or the natural, historic and built environment; by way of: air quality, including fumes and odour; noise including vibration; light levels; land quality and condition; or surface and groundwater quality.	This statement has been reviewed and is noted by the Applicant. In respect of air quality, we acknowledge Policy 30: Pollution of the South East Lincolnshire Local Plan 2011-2036 (adopted March 2019) but note that this refers to "*unacceptable adverse impacts"*. **Chapter 16 Air Quality (APP-067)** concludes that, with the implementation of mitigation measures (detailed within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)) (to be secured by the Draft DCO (Document Ref: 3.1)** the residual impacts of the Proposed Development will be Not Significant and, therefore, complies with Policy 30.

5.6.2	**ES Significant Effects** The ES contains Chapter 16 on Air Quality (APP-067) and Chapter 10 on Noise and Vibration (APP-061). The ES identifies no significant residual effects upon air quality and noise and vibration.	This statement has been reviewed and is noted by the Applicant; no response required.
5.6.3	Requirement 12 of the draft DCO relates to the construction environmental management plan (CEMP), which will be substantially in accordance with the outline construction environmental management plan (APP-077). The CEMP will be discharged by BBC and NKDC respectively.	This statement has been reviewed and is noted by the Applicant. As stated within Requirement 12(1) of the **Draft DCO (Document Ref: 3.1)**, "*No part of the authorised development may commence until a construction environmental management plan (which must be substantially in accordance with the outline construction environmental management plan) for that part has been submitted to and approved by the relevant planning authority, or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*".
5.6.4	The Councils Environmental Health team considered the details regarding impacts on air quality and noise/vibration of the development and operational phases. The risks of significant impacts are very low.	This statement has been reviewed and is noted by the Applicant; no further response required.
5.6.5	**Conclusions** There are therefore potential neutral effects from the Air Quality, Noise and Vibration Effect of the extension to the Bicker Fen Substation and the construction of the cable corridor.	This statement has been reviewed and is noted by the Applicant; no further response required.
	General Impact of Construction Activities	
5.7.1	**Local Planning Policy**	This statement has been reviewed and is noted by the Applicant. These aspects have been considered in detail

Policy 30 states that Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon: health and safety of the public; the amenities of the area; or the natural, historic and built environment; by way of: air quality, including fumes and odour; noise including vibration; light levels; land quality and condition; or surface and groundwater quality.	within **Chapter 6 Landscape and Visual (APP-057)**, **Chapter 7 Ecology (APP-058)**, **Chapter 8 Cultural Heritage (APP-)**, **Chapter 9 Access and Traffic (APP-060)**, **Chapter 10 Noise and Vibration (APP-061)**, **Chapter 11 Water Resources and Flood Risk (APP-062)**, **Chapter 12 Climate Change (APP-063)**, **Chapter 13 Glint and Glare (APP-064)**, **Chapter 14 Soils and Agricultural Land (APP-067)**, **Chapter 15 Socio Economics (APP-066)**, **Chapter 16 Air Quality (APP-067)**, **Chapter 17 Other Environmental Topics (APP-068) and Chapter 18 Cumulative Effects (APP-069)** of the Environmental Statement (ES). With the mitigation measures identified within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)**) (to be secured by the **Draft DCO (Document Ref: 3.1)** implemented, no 'unacceptable' impacts are identified. As summarised within **Chapter 19 Summary of Significant Environmental Effects (APP-070)**, Significant beneficial impacts are identified in respect of the 'ecology', 'climate change' and the 'socio-economic' assessments. There will be no Significant impacts in respect of the 'access and traffic', 'noise and vibration', 'water resources and flood risk' and 'air quality' assessments. Whilst significant adverse effects are identified in respect of the 'landscape and visual', 'cultural heritage', 'soils and agricultural land' assessments, these are all temporary and reversible and typical of this type of development and need to be considered in the planning balance. Section 6.2 of the **Planning Statement (APP-277)** outlines that any residual impacts are outweighed by material considerations in the form of the benefits and need

		for the Proposed Development. This is through the Proposed Development being identified as of Critical National Priority ('CNP') as shown in paragraph 4.2.5 of EN-1. This section also outlines that in paragraph 4.2.15 of EN-1, it states that "where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts." Therefore, we disagree that it must be demonstrated that there are no significant adverse environmental impacts that cannot be mitigated through the DCO process.
5.7.2	**Construction Activities disruption** BBC are concerned about the significant disruption that will be caused to the community during the construction phase taking account of construction timelines being for the extension works to Bicker Fen Substation are proposed to take 60 weeks, the cable route 12 to 24 months and generally 2.5 to 5 years.	The potential impacts that would arise as a result of activities associated with the 'construction phase' of the Proposed Development have been considered within **Chapters 6** to **16 (APP-057 to APP 067)** of the Environmental Statement (ES), with mitigation measures detailed within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and within **Appendix 2.3 Embedded Mitigation (APP-076)** (secured through the **Draft DCO (AS-088)**). These mitigation measures include the production of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**, **Appendix 9.3 Outline Construction Traffic Management Plan (APP-159)** and **Appendix 15.3 Outline Skills Supply Chain and Employment Plan (APP-179)**, secured through requirements 12, 13 and 17 of the **Draft DCO (Document Ref: 3.1)**, respectively.

In terms of potential disruption to the community during the construction phase of the Proposed Development, only Significant adverse effects in terms of views have been identified; reversible upon decommissioning. No Significant adverse effects were identified on communities in Boston Borough in **Chapter 15 Socio-economics (APP-066)**. Moreover, 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 (section 3.6 of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)**.

Chapter 9: Access and Traffic (APP-060) sets out that the access strategy for the development is that the majority of traffic construction utilises the A17 and Bespoke Access Road, to access minimise impacts on the local unclassified roads. The change in traffic on the A17 will be imperceptible in comparison with existing traffic flows.

The only traffic utilising unclassified roads during the construction phase will be for enabling works on the Solar Array Area, and for access to compounds for construction of the Cable Route. These will be low volumes of traffic and for relatively short periods of time (3-4 months per compound) and will have no material impact on the operation of the local highway network.

Access to Bicker Fen Substation is via the Triton Knoll Substation Access Road (a private road) and via very lightly trafficked public highway (Vicarage Drove and Bicker Drove) in the immediate vicinity of the Substation. Left-in, left-out movements only between the Triton Knoll access and the

		A17 will be permitted during the construction phase. No use of Bicker Drove south of Vicarage Drove or of Cowbridge Road is required for construction traffic (other than in case of emergency). This is in response to community feedback received at Statutory Consultation, and as with all access to the Proposed Development, is designed to minimise impacts on the local community. This access strategy for access to Bicker Fen Substation extension works aligns with that of the Heckington Fen Solar Park. Additionally, as stated within Table 19.11: Socio-Economics - Summary of Likely Significant Residual Effect of **Chapter 19 Summary of Significant Environmental Effects (APP-070),** there will be a moderate beneficial (Significant) impact or the Boston Borough workforce in respect of 'generation of local employment' and a moderate beneficial (Significant) impact for Boston Borough businesses and residents in respect of 'Gross Value Added (GVA)'.
5.7.3	**Cumulative Construction Activities Effects** BBC are also concerned over the potential for Cumulative Impact of Construction Activities form as number of NSIP Projects within the area.	**Appendix 4.2 Cumulative Assessment Short List (APP-082)** details the other developments (including Nationally Significant Infrastructure Projects (NSIP)) considered in relation to potential inter-cumulative impacts. This was agreed with the host local authorities in advance of the Environmental Impact Assessment (EIA) that was undertaken to inform the Environmental Statement (ES). The potential inter-cumulative in respect of construction (and decommissioning) are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the ES and assessed within **Chapter 18 Cumulative Effects (APP-069)**. Table 18.3 Summary of Inter-Cumulative Effects of Chapter 18 details the inter-cumulative impacts that have been

			considered, the relating mitigation measures (listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) (secured through the **Draft DCO) (Document Ref: 3.1)**) and the residual effects with these measures in place. With the identified mitigation measures, which include the preparation of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** (secured via Requirement 12 of Schedule 2 in the **Draft DCO**), **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)** (secured via Requirement 19 of Schedule 2 in the **Draft DCO** – note that the requirement numbering has changed at this Deadline), **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (secured via Requirement 7 of Schedule 2 in the **Draft DCO),** and **Appendix 9.3 Outline Construction Traffic Management Plan (APP-159)** (secured via Requirement 13 of Schedule 2 in the **Draft DCO**) in place, only one significant inter-cumulative impact is identified. This is in respect of 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 (and is described within paragraph 18.5.3 of Chapter 18).
5.7.4	4.1.1	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. For context HGV traffic and construction	**Appendix 4.2 Cumulative Assessment Short List (APP-082)** details the other developments (including the Heckington Fen Solar Farm Nationally Significant Infrastructure Project (NSIP) and other NSIPs) considered in relation to potential inter-cumulative impacts. This was

routes for HGV's is a concern locally with all the development in and around Bicker Fen Substation.	agreed with the host local authorities in advance of the Environmental Impact Assessment (EIA) that was undertaken to inform the Environmental statement (ES). The potential inter-cumulative impacts in respect of construction (and decommissioning) are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the ES and assessed within **Chapter 18 Cumulative Effects (APP-069)**. Table 18.3 Summary of Inter-Cumulative Effects of Chapter 18 details the inter-cumulative impacts that have been considered, the relating mitigation measures listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** (secured by the **Draft DCO (Document Ref: 3.1)**) and the residual effects with these measures in place. With the identified mitigation measures, which include the preparation of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** (secured via Requirement 12 of Schedule 2 in the **Draft DCO**), **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)** (secured via Requirement 19 of Schedule 2 in the **Draft DCO** – note that the requirement numbering has changed at this Deadline), **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (secured via Requirement 7 of Schedule 2 in the **Draft DCO),** and **Appendix 9.3 Outline Construction Traffic Management Plan (APP-159)** (secured via Requirement 13 of Schedule 2 in the **Draft DCO**) in place, only one significant inter-cumulative impact is identified. This is in respect of

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 (and is described within paragraph 18.5.3 of Chapter 18).

In terms of inter-cumulative impacts, the other developments with potential to result in inter-cumulative impacts are identified within **Chapter 4: Scope and Methodology (APP-055)** and reviewed in relation to traffic as part of Table 5.2 in **Appendix 9.1: Transport Assessment (APP-155 to APP-157)**. The majority of other developments are considered to either result in traffic impacts that do not impact the study area for the Proposed Development or they are unlikely to generate traffic during the construction phase of the development. Those that do overlap have been assessed cumulatively and there are negligible transport effects within the study area during the proposed construction programme.

Building on the commitments to local communication to support this application, set out in **Appendix 9.3: Outline Construction Traffic Management Plan (APP-159)**, the detailed CTMP (and wider project planning) will ensure effective liaison to minimise impacts on local roads. Section 4.2 of **Appendix 9.3 oCTMP** 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." Under Requirement 13 of the **Draft DCO (Document Ref: 3.1)**, 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. **Chapter 9: Access and Traffic (APP-060)** sets out that access to Bicker Fen Substation is via the Triton Knoll Substation Access Road (a private road) and via very lightly trafficked public highway (Vicarage Drove and Bicker Drove) in the immediate vicinity of the Substation. Left-in, left-out movements only between the Triton Knoll access and the A17 will be permitted during the construction phase. No use of Bicker Drove south of Vicarage Drove or of Cowbridge Road is required for construction traffic (other than in case of emergency). This is in response to community feedback received at Statutory Consultation, and as with all access to the Proposed Development, is designed to minimise impacts on the local community. This access strategy for access to Bicker Fen Substation extension works aligns with that of the Heckington Fen Solar Park. Overall, no significant inter-cumulative (traffic) effects are identified.
5.7.5	There are a number of other NSIPs within the area some of which are consented and others that are at various stages within the process. These are Heckington Fen Solar Farm which the DCO is made and a whole host of National Grid Projects including EGL 3 & 4, EGL 5, G to W and WMEL. There are also Meridian Solar Farm, Outer	**Appendix 4.2 Cumulative Assessment Short List (APP-082)** includes the other developments considered in relation to potential inter-cumulative impacts. This includes, amongst others, the Heckington Fen Solar Farm, Eastern Green Link (EGL) 3 and 4, the Meridian Solar Farm and the Outer Dowsing Offshore Windfarm.

	Dowsing Offshore Windfarm and Ossian Offshore Windfarm. There are common connection points with Heckington Fen and this Project connect into Bicker Fen Substation.	Whilst EGL 5 (G to W), WMEL and Ossian Offshore Windfarm are not included, **Appendix 4.2 Cumulative Assessment Short List** was agreed with the host local authorities in advance of the Environmental Impact Assessment (EIA) that was undertaken to inform the Environmental statement (ES). The potential inter-cumulative impacts are considered, as appropriate, within **Chapters 6** to **16 (APP-057 to APP 067)** of the ES and assessed within **Chapter 18 Cumulative Effects (APP-069)**. Table 18.3 'Summary of Inter-Cumulative Effects' of Chapter 18 details the cumulative impacts that have been considered, the relating mitigation measures listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)** (to be secured by the **Draft Development Consent Order (Document Ref: 3.1)**) and the residual effects with these measures in place. With the identified mitigation measures in place, as per paragraph 18.5.3 of **Chapter 18 Cumulative Effects (APP-069)**, in place, only one significant inter-cumulative is identified, which relates to the loss of agricultural land.
5.7.6	**Conclusions** There are therefore potential negative effects from the Construction Activity of the extension to the Bicker Fen Substation and the construction of the cable corridor.	This statement has been reviewed and is noted by the Applicant. It should be noted that, in order to identify the other developments for inclusion within the assessment of inter-cumulative effects, a four-stage approach was adopted. Table 18.3 Summary of Inter-Cumulative Effects of **Chapter 18 Cumulative Effects (APP-069)** details the inter-

cumulative impacts that have been considered, the relating mitigation measures (listed in detail within Section 19.2 Additional Mitigation of **Chapter 19 Summary of Significant Environmental Effects (APP-070)** and **Appendix 2.3 Embedded Mitigation (APP-076)**) (to be secured by the **Draft DCO (Document Ref: 3.1)**) and the residual effects with these measures in place.

With the identified mitigation measures, which include the preparation of **Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009 to REP1-010)** (secured via Requirement 12 of Schedule 2 in the **Draft DCO (Document Ref: 3.1)**), **Appendix 2.5 Outline Decommissioning Environmental Management Plan (REP1-011 to REP1-012)** (secured via Requirement 19 of Schedule 2 in the **Draft DCO** – note that the requirement numbering has changed at this Deadline), **Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089)** (secured via Requirement 7 of Schedule 2 in the **Draft DCO)** and **Appendix 9.3 Outline Construction Traffic Management Plan (APP-159)** (secured via Requirement 13 of Schedule 2 in the **Draft DCO)** in place, only one significant inter-cumulative impact is identified. This is in respect of 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.

Overall, it is considered that a proportionate and robust approach has been adopted in terms of identifying and refining the other developments (in agreement the host local authorities) for consideration within the ES.

		It is important to note that the principle of the Bicker Fen Substation Works has already been approved in the decision for Heckington Fen Solar Park. The only difference between the Proposed Development and the approved works relate to an additional circa 0.3 hectares of land to be developed to accommodate the Beacon Fen Energy Park generation bay to connect into the Substation and the impacts are considered to be broadly the same.
	Cultural Heritage	
5.8.1	**Local Planning Policy** The SELLP contains Policy 29: The Historic Environment which seeks to Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.	This statement has been reviewed and is noted by the Applicant; no response required.
5.8.2	**ES Significant Effects** The ES contains Chapter 8 on Cultural Heritage (APP-059) and a Heritage Statement at Appendix 8.2 (APP-118). The ES identifies no significant residual effects upon Heritage Assets within the Borough. Requirement 7 of the draft DCO relates to the landscape ecological management plan (LEMP), which will be substantially in accordance with the outline landscape ecological management plan. The LEMP will be discharged by BBC and NKDC respectively.	This statement has been reviewed and is noted by the Applicant on heritage matters. With regard to Requirement 7 (ecology) -no response required As stated within Requirement 7(1) of the **Draft DCO (Document Ref: 3.1)**, "*No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*".
5.8.3	**Baseline** There are no Designated Heritage Assets within the Order Limits. There are two Designated Heritage Assets within 1 km of the Order Limits (1232857 Bridge House & 1232896 The Mill) and three within 2 km of the Order limits (1232859	This statement has been reviewed and is noted by the Applicant. All designated heritage assets were considered and assessment following expected criteria as set out within Section 8.3 of **Chapter 8 Cultural Heritage (APP-059)** of the Environmental Statement (ES). The specified assets

	The Cottage, 1062017 Fore Lane Farmhouse and Stable & 1360492 Gaunlet House). All Grade II Listed Buildings.	were not taken through for assessment due to lack of potential for impact to their significance through setting change.
5.8.4	There is one Non-Designated Heritage Assets (MLI 187509) within the Order Limits. This is identified as Neolithic flint scraper on land at Bicker Fen; this was found close to a geotechnical borehole as part of evaluation works at Bicker Fen Substation in 2005. There are four outside the Order Limits (MLI 90719, MLI 12574, MLI 12570, MLI 12569) which are all related to find spot records.	This statement has been reviewed and is noted by the Applicant. All non-designated archaeological assets have been considered **within Appendix 8.1 Archaeological Desk Based Assessment (APP-117)**. The findspots referenced were taken into account in ascertaining overall archaeological potential as set out within the Archaeological Desk Based Assessment.
5.8.5	BBC also have an agreement with the County Council, that they will act on the Boroughs behalf in relation to Archaeology and the contents are however confined to built heritage matters.	This statement has been reviewed and is noted by the Applicant.
5.8.6	Due to the location of the Heritage Assets in relation to the Order Limits it's unlikely that those Heritage Assets identified would be significantly affected by the Proposed Development.	This statement has been reviewed and is noted by the Applicant.
5.8.7	**Conclusions** There is therefore potential neutral impact upon above ground Heritage Assets.	This statement has been reviewed and is noted by the Applicant.
	Overall Conclusion	
6.1	This LIR has undertaken a consideration of the potential impacts of the Beacon Fen Energy Park at the local level in respect of the BBC administrative area. It has considered both positive, negative and neutral impacts.	This comment has been reviewed and the applicant has no comments to make.

6.2	The LIR does not reflect the views of the County and nor does it make comments upon matters that are the County Councils Statutory Function such as acting as Local Highway and Transport Authority, Minerals & Waste Planning Authority and Lead Local Flood Authority.	This comment has been reviewed and the applicant has no comments to make.
6.3	BBC also have an agreement with the County Council, that they will act on the Boroughs behalf in relation to Archaeology matters.	This comment has been reviewed and the applicant has no comments to make.
6.4	BBC notes the national benefits of the scheme in terms of the provision of renewable energy and the positive impact this will have on climate change.	This comment has been reviewed and the applicant has no comments to make.
6.5	However, there is uncertainty about how the overarching positive impacts will benefit members of the local community within the BBC area. BBC therefore considers that the socio-economic impact of the Project is neutral. BBC also notes other potential neutral impacts for Air Quality, Noise and Vibration and Cultural Heritage.	**ES Chapter 15 Socio-economics (APP-066)** outlines benefits related to the Proposed Development. This is supported by **Appendix 15.3 Outline Skills Supply Chain and Employment Plan (APP-179)** that is to be included as a mechanism set out in requirement 17 of the **Draft DCO (Document Ref: 3.1)**. Table 15.20 of the **ES Chapter 15 Socio-economics (APP-066)** outlines how during the construction phase, the impact on 'Generation of local employment' and 'Gross Value Added' are Moderate Beneficial and considered to be significant benefits. The **ES (APP-050 to APP-070)** outlines the impacts on environmental receptors for the proposed development, including impacts for Air Quality, Noise and Vibration and Cultural Heritage.
6.6	BBC have also identified a number of potential negative impacts, as follows: -	The effects on agricultural land are assessed within **ES Chapter 14 Soils and Agricultural Land (APP-065)** and whilst significant impact on the loss of agricultural and has

- The loss of agricultural land, including high quality Best and Most Versatile Agricultural Land.
- The scale and significance of the impact on the landscape and visual amenity of the area including the impacts on Landscape Character Area, nearby residential properties and Public Rights of Way.
- Biodiversity Net Gain and impact upon LWS South Forty Foot Drain.
- The significance of disruption to the community during the construction phase

been identified in construction phase, embedded mitigations measures are secured through the **ES Appendix 14.4 Outline Soil Management Plan ('OSMP') (REP1-013 to REP1-014)**. The OSMP details the requirements for the development of a site-specific Soil Management Plan ('SMP') which will be required as part of the construction phase. A detailed soil survey of the Cable Route Corridor will be carried out pre-construction to inform the SMP. Industry best practice guidance is secured within the **ES Appendix 14.4 OSMP (REP1-013 to REP1-014)** which provides guidance on soil management, handling, storage, replacement and mitigation for soil works during the construction of the Solar Array Area and Bespoke Access Road, and the installation of the Cable Route.

ES Chapter 6 Landscape and Visual (APP-057) outlines the impacts on the landscape and visual amenity of the area. Whilst significant effects have been identified during construction phase at the Site level, the Fenland Sub Area and Holland Reclaimed Fen LCA, the effects of construction will be short term and reversible and will include the implementation of mitigation measures and landscape mitigation measures outlined in **ES Figure 6.31 Landscape Strategy Plan (APP-233, AS-021 and APP-235).** This is to be secured through the **ES Appendix 6.7 Outline Landscape and Ecological Management Plan ('OLEMP')**.

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.

The **Biodiversity Net Gain Strategy (APP-280)** outlines that direct impacts to the South Forty Foot Drain will be avoided as the Cable Route will be installed using trenchless techniques such as horizontal directional drilling (HDD). This is outlined within the **Applicant Responses to Relevant Representations (REP1-029)**, with **Figure 6.32 Vegetation Removal Plan (APP-236 to REP1-015)** having been updated and submitted alongside this document at Deadline 1 to clarify and respond to the issue raised regarding 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, it is not proposed to remove existing vegetation on the South Forty Foot Drain.

The **Biodiversity Net Gain Strategy (APP-280)** outlines that the proposed development is anticipated to result in the following project-wide overall percentages changes for BNG:

- 36.43% net gain in Habitat units;
- 10.79% net gain in Hedgerow units, and
- 15.95% net gain in Watercourse units.

ES Chapter 9 Access and Traffic (APP-060) and **ES Appendix 9.3 Outline CTMP (APP-159)** outlines the mitigation measures to be implemented in order to minimise the disruption to the community during construction phase. **ES Chapter 9 Access and Traffic (APP-060)** goes on to outline that the access and traffic effects of the Proposed Development during construction are negligible, and not significant. The access to Bicker Fen Substation is via the Triton Knoll Substation Access Road (a private road) and via very lightly trafficked public highway (Vicarage Drove and Bicker Drove) in the immediate vicinity of the Substation. Left-in, left-out movements only between the Triton Knoll access and the A17 will be permitted during the construction phase. No use of Bicker Drove south of Vicarage Drove or of Cowbridge Road is required for construction traffic (other than in case of emergency). This is in response to community feedback received at Statutory Consultation, and as with all access to the Proposed Development, is designed to minimise impacts on the local community. This access strategy for access to Bicker Fen Substation extension works aligns with that of the Heckington Fen Solar Park.

Appendix 1: Applicant Responses to NKDC's Appendix C

Report	Section of Report	Comment	Applicant Response
General	N/A	The Applicant welcomes the comments from the NKDC Ecologist and the opportunity to discuss these at a meeting on 14th August 2025. The Applicant has reviewed and made updates to Chapter 7 Ecology (APP-058), the outline Construction Environmental Management Plan (oCEMP) (APP-077), the Habitats Regulations Assessment (HRA)(APP-050) and Biodiversity Net Gain Strategy (APP-280) at Deadline 2. As noted in the response to the relevant representations at Deadline 1 the Applicant has identified themes in the comments: The applicant has considered the Rochdale Envelope and likely worst case scenarios assumed where impacts cannot be full identified, in accordance with the parameters set out within Chapter 2 Proposed Development (APP-053). As discussed in the meeting between the Applicant and NKDC (14th August 2025), further clarification will be provided. The mitigation for breeding birds (including ground nesting birds) has been considered within Chapter 7 Ecology (APP-058). The Applicant acknowledges the comments within the Relevant Representation and discussions during the meeting with NKDC (14th August 2025) and will clarify within the updated Chapter 7 Ecology (APP-058) where mitigation has been adopted. Chapter 7 Ecology (APP-058) will be updated where necessary to clarify the justification for choosing habitat types. This will include responding on the methodology used in the survey works. A review of the local strategy will be made to highlight where the biodiversity enhancements within the Biodiversity Net Gain Strategy (APP-280) accords with the local and county planning objectives. Recognising that biodiversity net gain is not mandatory, the Applicant and reviewer discussed the level of detail required at this stage during the meeting with NKDC (14th August 2025). The Applicant would welcome the opportunity for further discussion with NKDC once they have had the opportunity to consider the Applicant's responses to its comments and the updated information/clarification submitted into the Examination..	
Chapter 7 Ecology	Table 7.1 – Summary of Consultations	Not all of the responses provided address the prior comments, and some comments cannot be verified. As noted elsewhere, the botanical survey results do not evidence attention to scarce arable flora, with implications for the impact assessment. The response on the approach to aquatic surveys references the terrestrial invertebrate survey approach. It also cannot be verified from the method and results that the botanical report specifically addressed aquatic plants.	Comments have been addressed throughout the process with ongoing adjustments to survey effort, approach and related mitigation requirements. Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) and Appendix 7.15 Botanical Survey Report (Cable Route and Access Road) (APP-104) include reference to survey

		The response to survey effort for quail (a Schedule 1 bird species) is incorrect. The survey dates given in the breeding bird survey report clearly identify (Table 3-2) four phases of survey in the period mid-May to the end of July which is the survey period for quail. Therefore the required six surveys in this period (as fully referenced in the prior advice) were not completed. **Supplementary information should be provided that addresses the above points and the original comments.**	of arable field margins for scarce arable flora in line with the Lincolnshire Biodiversity Action Plan (Lincolnshire Biodiversity Partnership). The water bodies were assessed during the phase 1 habitat survey (Appendix 7.3, APP-092). No further botanical assessment was identified as necessary for the water courses, these are likely to be influenced by agricultural chemical inputs (including fertilisers and herbicides) which would reduce or eliminate biodiversity. Breeding bird surveys were spaced out to cover the whole season and capture passage bird species; six surveys were carrid out over this period. On the four visits in the late spring/early summer period no quails were detected (quail were heard in the Beacon Fen South area which no longer makes up part of the Site). However acknowledging this is a secretive species table 7.1 of Chapter 7 Ecology (APP-058) will be updated regarding quail to clarify that the mitigation within Section 7.7 of this Chapter describes how potential effects on quail are mitigated..
Chapter 7 Ecology	General (birds)	The assessment of birds within the chapter and appendices is not consistent. The solar array in isolation is stated to be of local value for wintering birds, whilst the data for	The value to birds is based on the assemblage of species recorded on the

		the Cable Route and Bespoke Access (two geographically discrete areas connected via the land in the solar array) appears to have been aggregated and county value has been concluded for this combined area. **This approach needs to be explained given the solar array is also likely to have an elevated value if the data is aggregated with that for other areas.** Potential impacts on barn owl have not been assessed despite the identification of nesting habitat at the southeast corner of the solar array near Carr Dyke. **What are the implications for this protected species?** No attempt appears to have been made to update the baseline on Schedule 1 birds (barn owl, quail and other species that could occur) since the 2022 survey of the solar array. This could be overlooked if a more precautionary approach had been taken. However, no clear attention is given to such species in the Chapter and no mitigation provision is identified for Schedule 1 birds, either in terms of the embedded mitigation or the additional mitigation. What would the approach be to reconfirming the status of such species prior to construction and protecting them, and how will this be secured? The impact assessment of birds is rather weak given the limited coverage and the decision to assess wintering and breeding birds together. The relevant considerations in relation to wintering and breeding birds are not fully comparable, and the consequences for species dependent on arable farmland are different from those dependent on other habitats. While the consequences for skylark is covered, the consequences for the long term suitability of the site for wintering birds of open farmland is not clearly assessed. This also has potential relevance for the cumulative impact assessment. A more robust, evidence based assessment should be provided for this diverse assemblage of species with divergent habitat requirements and sensitivities.	survey. The surveys were carried out for the three components of the Site and split out as follows: Solar Array Area, Cable Route Corridor and Bespoke Access Corridor, hence the value level is directly related to the areas surveyed. The impacts resulting from the Solar Array Area will be through the life of the project whereas the cable route corridor and bespoke access road impacts will mainly occur during construction. For wintering birds as stated in Section 7.6 and Table 7.7 of Chapter 7 Ecology (APP-058) both the Solar Array Area (in isolation) and the combined Bespoke Access Corridor and Cable Route Corridor were of County value with 71 and 66 bird species respectively. For breeding birds the Solar Array Area (in isolation) was of Local value and the combined Bespoke Access Corridor and Cable Route Corridor was of County value with 45 and 78 bird species recorded respectively. . Further clarification will be included in Table 7.7 of Chapter 7 Ecology (APP-058) at Deadline 3. As outlined in section 6.7.10 of the oCEMP (APP-077) a nesting bird check will be undertaken pre-works, this includes for barn owls. This includes an appropriate sized and

			timed buffer to be decided by the ecologist at the time. As an example referring specifically to the box in the south-east corner by Carr Dyke, as referenced in the nesting bird report (APP-092) this is also used by jackdaw and kestrel simultaneously and it was concluded that the barn owls here may accept a greater amount of disturbance (and therefore require a reduced buffer) than where a box has just been occupied by barn owls. Barn owl impacts are covered by breeding bird impacts within Table 7.7 of Chapter 7 Ecology (APP-058). It should be noted that the provision of vegetated buffers along ditches and other areas of grassland as outlined in the oLEMP (APP-089) will result in a greater food resource for barn owls and result in more successful breeding for birds on and off site. Section 7.6 of Chapter 7 Ecology (APP-058) is being updated to separate the assessment of effects on birds generally and then separately breeding and wintering birds to make it clearer to the reader which effects are being assessed. This will be submitted by Deadline 3. .

Chapter 7 Ecology	7.5.16-7.5.17 (baseline)	Scarce arable flora are discussed within a section on grassland. Such species would not be expected in grassland, so it is not surprising that none were found. It is also noted that the underpinning Appendix contains no methods or results to demonstrate attention to this specialist group of plants dependent on cultivated land. **Further explanation is required to explain why these species were surveyed for within unsuitable habitats rather than within cultivated land**.	Section 7.5.17 of the ecology chapter APP-058 refers to scarce arable flora and has been included in the grassland section. However Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) and Appendix 7.15 Botanical Survey Report (Cable Route and Access Road) (APP-104) both include reference to surveying arable margins which is the appropriate habitat to support scarce arable flora (see Lincolnshire Biodiversity Partnership: Lincolnshire Biodiversity Action Plan 2011 – 2020). Notable or protected plants are described as being assessed in the methods of both reports.
Chapter 7 Ecology	Table 7.7	It is stated that most hedgerows are species-poor which is not supported by the habitat map in the botanical survey report for the solar array. It is also stated that none are of LWS quality, which again is not supported by the botanical survey report for the solar array (paragraph 4.1.14). Hedgerows of LWS quality would have a county nature conservation value, not local as stated. Supplementary data should be provided to allow review and verification of the status and value of individual hedgerows. This data is also required to support agreement of the BNG baseline.	Table 7.7 in Chapter 7 Ecology (APP-058) states that the majority of hedgerows on the Solar Array Area were species poor; 11 of 21 were species poor. The numbers will be added in to make it clear this is a small majority. It is noted that the table refers to the hedgerows within the Cable Route Corridor / Bespoke Access Road as not of LWS criteria, but makes no mention of the LWS criteria for the Solar Array Area. Table 7.7 in Chapter 7 Ecology (APP-058) will be updated to include reference to hedgerows

			of LWS quality being at County value and submitted as Deadline 2 . Report 7.3 Biodiversity Net Gain Strategy (APP-280) will also be updated with the hedgerow data and submitted at Deadline 3.
Chapter 7 Ecology	Table 7.8	It is stated that no trees suitable for roosting bats will be removed or affected. This statement requires review (given the incorrect assumption elsewhere that all trees will be retained and protected) with reference to the schedule of Tree Works given in the Arboricultural Impact Assessment. **Clarification is required on this point.**	The text in Table 7.8 of Chapter 7 Ecology (APP-058) will be adjusted to reflect that, whilst not all trees are being retained, the design of the Proposed Development has incorporated minimal loss of habitat, including hedgerows and trees. Where removal of trees is outlined within Appendix 6.6 Arboricultural Impact Assessment (APP-088), this has been cross referenced with Appendix 7.13 Bat Roost Assessment Report (Solar Array Area) (APP-102) and Appendix 7.16 Bat Roost Assessment Report (Cable Route and Access Road) (APP-105). As no trees with bat roost potential have been outlined for removal, no further survey action is required.
Chapter 7 Ecology	Section 7.4	It is not explained how the Rochdale Envelope has been applied in relation to ecology to ensure a robust worst case (pending detailed design post- determination) assessment of potential impacts and effects. For example, the works at the Bicker Fen substation, and the potential tree and woodland losses identified in the Arboricultural Impact Assessment do not appear to have been considered. Further, the assumptions	The uncertainty around sections of the works, (as mentioned including the substation) has been mentioned in different sections of the chapter (APP-058). For example under impacts for standing water (section 7.6.81) where due to uncertainty

		on retention of habitats after decommissioning (e.g. 7.6.92) seem (without further explanation) unreasonable and not securable. **Clarification is required on this point.**	over retention of the pond near the substation the impact has been elevated. Section 7.7 of the chapter identifies that in some areas, the precise location or method of works may impact species in different ways therefore update surveys will be undertaken (section 7.7.1). An example is that water voles and otters may be affected dependent on the final route of the cable. Update surveys along this route will confirm impacts and identify further mitigation. This has been secured in the oCEMP (APP-077). The removal of trees on the Site, including those within the Bicker Fen substation, will be included within Chapter 7 Ecology (Document Ref. 6.2.7), the latest version of which is submitted alongside this document at Deadline 2, and the assessment in Section 7.6 and Table 7.8 updated accordingly. This has been submitted alongside this document at Deadline 2.
Chapter 7 Ecology	7.6.55 CONFIDENTIAL	CONFIDENTIAL The assessment of badger is not adequate, particularly given the baseline is incomplete. I identify no baseline data to understand the impact on badger from the Bespoke Access and Cable Route. The number of setts that would be affected by the Proposed Development is not stated, and it is not identified whether a development licence would be needed.	A baseline badger assessment was undertaken alongside the Preliminary Ecological Appraisal (PEA) for these areas and further information will be included in Appendix 7.20 – Preliminary Ecological Appraisal Report Cable Route and Access

		Standing advice states “Where possible development proposals should avoid negative effects on badgers. Where this is not possible, the developer will need to include adequate mitigation or, as a last resort, compensation measures in their development proposal to allow you to make a planning decision.” As a transparent assessment has not been provided it is not possible to verify that these requirements have been met. It is not clear if any mitigation or compensation strategies need to be secured. Additional information and assessment should be provided. The relevant impact pathways to address are given in the standing advice.	Road (APP-112) to provide further clarity. This will be submitted by Deadline 3. The shape of the Solar Array Area has been designed to avoid known setts; to avoid potential persecution, these have not been highlighted, but the setts are referred to in the Badger Survey Report (APP-097). For the Cable Route and Bespoke Access Road, the exact alignment is not yet confirmed, and it is not possible to detail what number and types of setts will be on the routes at this point. Further surveys are proposed (see Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)) to update the baseline close to construction and identify any mitigation required at that point. This will follow the mitigation hierarchy and setts will be avoided where possible (e.g. by amending the alignment) and as a last resort they will be closed under licence. A specific Badger Appendix Report for the Bespoke Access Road and Cable Route has not been provided as the badger results are summarised in Appendix 7.20 Preliminary Ecological Appraisal Report Cable route and access road (APP-112).

Chapter 7 Ecology	7.6.58-7.6.60	Insufficient assessment has been provided to understand the worst case implications for water vole. The number of crossings of occupied habitat, and the number of animals likely to be affected is not clearly defined. The impact assessment does not address the extensive impacts on ditch habitats stated in Section 7.7 i.e. 30m of habitat disturbance on each ditch crossed by the Cable Route and up to 50m (motorway width!) for the Bespoke Access. **Supplementary assessment should be provided to address the need for a robust, evidence-based assessment of potential impacts.**	The riparian mammal survey effort that is included in Chapter 7 Ecology (APP-058) 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 record within the Solar Array Area. Where evidence of water voles has been found within the Cable Route Corridor, worse case implications have been assessed. This includes assessment of the worst case disturbances based on losing 30m of riparian habitat for the Cable Route and 50m for the Bespoke Access Road to account for their respective construction corridors. Detailed mitigation has not been identified at this stage where the final footprint of the Cable Route and Bespoke Access Road is undetermined. Updated riparian mammal surveys closer to the date of construction have been identified as necessary to detail mitigation (see Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)). Nonetheless as the corridors for both the Bespoke Access Road and the Cable Route have been assessed for potential impacts to riparian species, the worst case impacts have been fully

			considered, and sufficient secured mitigation is in place to ensure no significant adverse effects will arise.
Chapter 7 Ecology	Section 7.6 (impact assessment)	A number of significant adverse effects on the conservation status of ecological receptors are predicted during construction. The mitigation for these impacts is not confirmed or demonstrated to be adequate so significant residual effects cannot be discounted. This includes significant effects on the: - Qualifying bird species of The Wash SPA and Ramsar site; - The qualifying otter population of The Wash and North Norfolk Coast SAC; - Great crested newt – a European Protected Species; - Barbastelle bat – a protected and threatened species; and - Water vole – a protected and threatened species. The impact on LWSs appears to worse at decommissioning than at construction, which merits review. The decommissioning effect is stated to be significant as the conservation status of LWS would be adversely affected. Significant effects on conservation status are also predicted for: - Qualifying bird species of The Wash SPA and Ramsar site; - Great crested newt – a European Protected Species; - Wintering birds; and - Barbastelle bat – a threatened species. This assessment, if correct and unmitigated (see below for comment on this), would indicate a development that conflicts with legislation and planning policy.	Section 7.6 of Chapter 7 Ecology (APP-058) will be updated by Deadline 3 to reiterate that with suitable and specific mitigation, any significant adverse effects for the listed ecological receptors are reduced to acceptable levels. Throughout the ecology assessment it has been demonstrated that the mitigation to reduce significant adverse impacts is achievable to reduce any effects to an acceptable and minimal level. For the qualifying bird species of the Wash SPA and Ramsar a review was made of whether significant numbers of each bird species uses the Site. This is defined by if the Site supports a population of at least 1% of the SPA and Ramsar population of each species. Following this review it was found gadwall and lapwing met this threshold (i.e. the population of those two species was at least 1% of the size of the Wash SPA and Ramsar population). As the likely impacts of the Proposed Development come from disturbance of these species over winter the mitigation included an appropriate no-work buffer during the winter months (November

			to February) during construction. This has been secured in the oCEMP (APP-077). For Great Crested Newt (GCN) the Applicant has been issued a Letter of No Impediment (received 23rd September 2025). Appendix 5.4 Other Consents and Licences Statement (APP-276) will be updated to reflect this. Mitigation outlined within the licence has been agreed with Natural England and no significant adverse impacts are expected. For water voles and otters surveys found these species using the Cable Route Corridor with the water vole using the Bespoke Access Route Corridor. Impacts could occur from disturbance or damage of habitats during construction. As the precise route of the cable installation and access route have not been defined, update surveys will be undertaken pre-construction with the results used to inform any mitigation required. This has been secured in the oCEMP (APP-077). For barbastelles (and other bats) impacts could occur due to loss of hedgerows and/or poorly designed lighting. Where hedgerows will be removed, temporary crossings will be installed to maintain commuting routes. The

			timing of works will be designed to avoid the need for lighting at night, and will prevent or minimise light spill. These actions will avoid impacts on barbastelles and other bat species This has been secured in the oCEMP (APP-077). At decommissioning the impacts will be similar to construction for the Bespoke Access Road and Solar Array Area. The Bespoke Access Road may be removed or left in place if requested by the landowners. For assessment of effects the 'worst case' option, that it will be removed with associated disturbance and pollution risks has been assumed. For the Cable Route Corridor, there will not be the same impacts as the cable will be left in situ rather than dug up and no 'de-construciton' effects will occur.' effects will occur. For qualifying bird species of the Wash SPA and Ramsar site, and wintering birds, gadwall and lapwing have the potential to be impacted. As at decommissioning a no-work buffer will be set up during the winter months (November to February) to avoid impacts on these species. This has been secured in the outline Decommissioning

			Environmental management plan (oDEMP, APP-078). With regards to great crested newts, update surveys will be undertaken to determine the need for mitigation, including application for a licence (if required). This has been secured in the oDEMP (APP-078). For barbastelles and other bat species there could be impacts as a result of lighting during the decommissioning works. To avoid this a sensitive lighting scheme will be implemented. oDEMP (APP-078). In summary mitigation measures have been outlined in the OCEMP (APP-077) and oDEMP (APP-078) to avoid these adverse effects on the ecological receptors outlined above. It is therefore considered that the Proposed Development will have no adverse effects on the ecological receptors considered in Chapter 7 Ecology (APP-058) Section 7.2 of Chapter 7 considers the legislation and policy relevant to the assessment of Ecology and explains how the Proposed Development addresses the same.

Chapter 7 Ecology	Section 7.7 (Additional Mitigation):	This links with the above points on Section 7.6. It is agreed that where licences are needed these would only be granted if conservation status can be maintained. However, confidence is needed that licences are likely to be granted. In relation to the species named above (Section 7.6): - The mitigation for the impact on qualifying birds (gadwall) is not confirmed as agreed with the Appropriate Nature Conservation Body (Natural England). Based on my prior experience, the 70dB threshold for impact would seem rather high and further assessment and mitigation may be required before it is agreed that there is no likely effect on conservation status. This is primarily a matter for Natural England to resolve/ agree in relation to the HRA, but the EcIA cannot be agreed without confirmation that the mitigation is sufficient. **Further information is required.** - It is not confirmed what mitigation is required for great crested newt or that Natural England has provided a Letter of No Impediment. So, it is not demonstrated that favourable conservation status can be maintained. **Further information is required.** - As the preceding impact assessment should have been made with regard to the embedded mitigation that is integral to the development, it is assumed that additional mitigation is necessary for wintering birds to address the significant effect. No mitigation is identified to address this. - The only mitigation for bats is the proposed 'temporary crossings'. It is not clear that this addresses the impacts on bats leading to the conclusion of a significant effect. The Bespoke Access will result in permanent breaches of habitat that will not be resolved by temporary crossings during construction, and it needs to be confirmed that it will be possible to adequately reinstate suitable habitat over	Natural England were consulted on May 2024 and September 2024 (as per Table 7.1 of Chapter 7 Ecology (APP-058)) through the DAS with regards to wintering birds, Gadwall and the HRA. The methodology, assessment and conclusions which informed the mitigation were discussed and agreed by Natural England in the Relevant Representations (July 2025). Mitigation for Great Crested Newt (GCN) will be finalised as part of the licencing requirement and agreed with Natural England. A draft licence was submitted to Natural England 21st August 2025 which outlines the proposed GCN mitigation. A Letter of No Impediment has subsequently been issued on 23rd September 2025 that conditions population surveys. This follows the process that was agreed with Natural England regarding the GCN requirement for the project. The riparian mammal survey effort that is included in Chapter 7 Ecology (APP-058) 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 record within the Solar Array Area. Where

		the Cable Route after construction. A clearer impact assessment is required to permit agreement that the mitigation is sufficient. - It is stated that a licence may be needed for water vole. Given the scale of habitat loss indicated in 7.7.11 (which seems unnecessarily large for watercourse crossings), a development licence may be needed. Such licences require enhancement as well as mitigation, but it has not been demonstrated that enhancement is deliverable and securable. Insufficient information is provided to understand the magnitude of impact and consequently demonstrate the predicted impact and significant effect can be adequately addressed.	evidence of water voles has been found within the Cable Route Corridor, worse case implications have been assessed. Updated riparian mammal surveys closer to the date of construction have been identified as necessary to detail mitigation (see Appendix 2.4 Outline Construction Environmental Management Plan (APP-077)). Nonetheless as the corridors for both the Bespoke Access Road and the Cable Route have been assessed for potential impacts to riparian species, the worst case impacts have been fully considered, and sufficient secured mitigation is in, the licence is achievable. Mitigation for water voles is in place to ensure no significant adverse effects will arise. Embedded mitigation includes buffers of watercourses (a minimum buffer of 5m within which there will be no new infrastructure) and this will provide substantial enhancement of riparian habitat. A water vole licence is not considered necessary at this stage, given the mitigation measures and enhancement of watercourses across the Proposed Development. However, should it be required after the detailed design, this would be applied for from Natural England.

			The mitigation for wintering birds includes an appropriate no-work buffer during the winter months (November to February) during construction for gadwall and lapwing. This has been secured in the oCEMP (APP-077). With regards to other wintering bird species, these were generally spread throughout the Site. As the Proposed Development will be built in sections (rather than all at once) the impacts of disturbance would be isolated to each construction section. The relatively low numbers of birds would be able to move to other sections where construction was not occurring, or adjacent fields outside the Order Limits and the resultant impact on wintering birds will be not significant. Mitigation for bats also includes timing of works which will avoid the need for lighting at night, and will prevent or minimise light spill. These actions will avoid impacts on barbastelles and other bat species This has been secured in the oCEMP (APP-077). Additionally, the majority of barbastelle records relate to the Cable Route Corridor where impacts are temporary. Hedgerow protection and enhancement as outlined within Appendix 6.7 Outline Landscape and

			Ecological Management Plan (APP-089) will provide additional foraging and commuting habitat for bats.
Chapter 7 Ecology	Section 7.7.12	This identifies habitat losses for works within Bicker Fen substation that do not appear to have been addressed within the impact assessment (Section 7.6) or mitigated e.g. woodland loss. It is stated that worst-case habitat compensation for this may need to be provided within the solar array, it is not demonstrated that this can be accommodated. It is not allowed for in the BNG Strategy. **Supplementary assessment should be provided.**	Habitat losses as per Figure 6.32 Vegetation Removal Plan (APP-236) within the Bicker Fen substation have been included within Section 7.6 of Chapter 7 Ecology (APP-058). 7.3 Biodiversity Net Gain Strategy (APP-280) has been written to ensure habitat losses at the Bicker Fen substation are appropriately accounted for, these are considered in the BNG strategy (APP-280) in Section 2.4.8 and compensation is provided based on worst-case assumptions.
Chapter 7 Ecology	Section 7.8 (Enhancement)	Measures should only be presented as enhancement if they are certain to be successful. In the case of the waterbody enhancement in 7.8.2 it is not demonstrated that de-silting dry waterbodies will result in ponds that will hold water. The reasons for the current lack of water are not given and there appears to be no corroborating assessment from an appropriate specialist (e.g. a hydrologist). Given this, I would expect Natural England to make similar observations should this be relied on for purposes of a great crested newt licence application. Further information is required. No enhancement is offered for water vole. As noted above, this could be necessary to secure a licence. Further information is required.	As the ponds are situated more than 500 m away from the ponds with positive eDNA for Great Crested Newt (GCN), these have been removed from the mitigation required for GCN. This measure of waterbody enhancement is not considered necessary and does not affect the assessment. The updated mitigation was proposed within the draft licence application has been accepted and a Letter of No Impediment from Natural England has been provided. Section 7.8.2 of Chapter 7 Ecology (APP-058) will be updated

			on the basis that onsite waterbodies are not required to be enhanced. This will be submitted by Deadline 3 to review new opportunities for enhancement following Magic map (DEFRA 2025) updates. Appropriate buffers have been included in the design as part of the embedded mitigation. This includes a minimum 5m buffer to all watercourses and waterbodies, within which there will be no development; and 9m buffer to all watercourses and waterbodies, within which there will be no new infrastructure that would impede access to the watercourse or waterbody. The creation of buffers around watercourses will in turn create enhancement for riparian species including water voles.
Chapter 11 Cumulative	General	There is insufficient clarity on the mitigation for ground nesting birds (wintering birds may also have relevance, see the comment above), so it is not possible to agree there would be no cumulative impacts. Some of the other schemes assessed are in development or at Examination and their mitigation is yet to be confirmed as sufficient. These birds cannot be discounted unless it is agreed that the Beacon Fen mitigation is sufficient to address the project- specific impact on ground nesting birds. My reading of Chapter 7 (7.6.53) is that an impact is predicted but it is not considered significant in isolation. It is also not stated that mitigation will be provided, and the Outline LEMP does not appear to include mitigation for ground nesting birds.	The impact on ground nesting birds from the development has been reviewed. There will be loss of arable land, however there will be a large increase in food supply from different grassland types and new hedgerows to improve the quality of habitats. Recent studies (e.g Copping, J. P., Waite, C. E., Balmford, A., Bradbury, R. B., Field, R. H., Morris, I., & Finch, T. (2025). Solar farm management influences breeding bird responses in an arable-dominated

		Therefore the assessment in Chapter 7 does not preclude potential for cumulative impacts and effects. **Further assessment and information is required.**	landscape. Bird Study, 1–6) have shown that the diversity and abundance of birds can increase on solar farms compared to arable habitats, with management being key. The applicant has committed to varying timings of cuts of both grassland and hedgerows within the oLEMP (APP-089) to produce heterogenous landscapes. Further mitigation includes inclusion of fencing in Section 7.6.65 (secured in the oCEMP, APP-077), to prevent mammalian predators accessing ground nesting birds' eggs or chicks.

Appendices – Energy Park or Whole Development

Report	Section of Report	Comment	Applicant Response
Appendix 2.3 Embedded Mitigation	EM2	The statement on retention/protection of all woodlands and trees **should be reviewed** (see related comments below and above).	The text in line EM2, Appendix 2.3 Embedded Mitigation (APP-076) will be adjusted to reflect that, whilst not all trees are being retained, the design of the Proposed Development has incorporated minimal loss of habitat including hedgerows and trees. This will be submitted by Deadline 2.

Appendix 2.4 Outline CEMP	6.7	The details are largely sufficient for current purposes. More precision, e.g. in relation to the locations and coverage of habitat buffers, will be expected from the final CEMP.	The Applicant has noted this response. At the time the detailed Construction Environmental Management Plan (CEMP) is prepared, this point will be addressed at that time.
Appendix 2.4 Outline CEMP	General	**A commitment should be included** for the provision of a Fish Management Plan to demonstrate suitable mitigation and legislative compliance. This commitment will need to be carried into other documents.	Details of the fish management including suitable mitigation and legislative compliance has been included within Appendix 2.4 Outline Construction Environmental Management Plan (REP1-009) at Deadline 1.
Appendix 2.4 Outline CEMP	6.7.6	The referenced HRA needs to be completed and agreed pre-determination. It is not a matter for agreement post-determination.	The Habitat Regulation Assessment (HRA, APP-050) has been completed and agreed with Natural England. The oCEMP (APP-077) will be updated at Deadline 2 to amend this reference.
Appendix 2.4 Outline CEMP	6.7.11	Specifications for bird and bat boxes are matters to be agreed with the relevant planning authority rather than Natural England, unless they form part of the mitigation strategy for a protected species licence.	Section 6.7.11 of Appendix 2.4 Outline Construction Environmental Management Plan (APP-077) will be updated to include a statement that specifications will be agreed with the planning authority.
Appendix 6.6 Arboricultural Impact Assessment		Three veteran trees were identified within the solar array area, and an additional tree is almost veteran. Nine veteran trees/tree groups occur on the cable route corridor. Six veteran trees occur in the access route corridor.	Fox covert, identified as woodland W3 in the Arboricultural Impact Assessment (APP-088) has been allocated a Root Protection Area which is 3m beyond the crown spread of the

		Protective buffers have been applied in accordance with good practice (paragraph 11.1.9), so the requirements of planning policy have been met in relation to the identified trees. The status and level of protection of the veteran trees identified by ecologists in Fox Covert is not stated. **Supplementary information should be provided.** There are some trees that **merit further review and agreement with the NKDC Tree Officer in relation to veteran status**. The recorded sizes and descriptions merit a second opinion to provide confidence that all veteran trees are protected. The relevant trees are T76, T1124 and T1125. The latter two trees are black poplars so are otherwise notable.	woodland's edge trees. This takes into account the average crown spread of 4.2m for the edge trees, giving a total Root Protection Area of 7.2m which is in accordance with British Standard 5837:2012 guidance on allocating Root Protection Areas. No veteran trees were found close to the edge of the woodland; the trees in question are further into the interior of the woodland. The woodland is to be retained, and its Root Protection Areas fully protected with fencing, thus any veteran trees within the interior of the woodland will be protected by the protection fencing specified in the Arboricultural Impact Assessment (APP-088). N.B. the trees are considered for botanical purposes as the presence of veteran and ancient trees influences the ecology of the woodland. Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) Tree T76 is the remains of a tree, with only a 4.6m tall stump remaining. This tree has no crown, with only minor epicormic growth growing from the stump. This tree has been allocated a Root Protection Area in accordance with British Standard 5837:2012, of 707m² by area and 15m radius. Due the

			stump having no crown and having very few vascular functional units left, it is very likely that the stump's roots system will have shrunk significantly from the size it would have been when this tree had a crown. It is considered that the allocated Root Protection Area for this stump is sufficient to protect the stump and what remains of its root system. Tree 1124 has been recorded as a veteran tree during the survey and has been allocated a veteran tree buffer zone, in addition to its standard BS 5837:2012 Root Protection Area. There is an existing farm track within this tree's Root Protection Area and Veteran Buffer Zone, which will be utilised by the Cable Route Corridor cable installation traffic. Due to the compacted nature of this track, it is not considered that the underlying soil will become anymore compacted than it currently is. The reminder of this tree's Root Protection Area and Veteran Buffer Zone will be protected with fencing to prevent damage to the soil within the Root Protection Area and Veteran Buffer Zone. 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. **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**). Tree 1125 does not have sufficient veteran features for this tree to classed as a veteran tree. This tree has been allocated a Root Protection Area totalling 707m², in accordance with the guidance set out British Standard 5837:2012. As with tree T1124, a stoned farm track is within this tree's Root Protection Area and this track is to be utilised by the cable installation traffic. This track is a well-used and compacted aggregate stoned track and thus it is not considered that the use of the track for cable installation vehicles will cause any further compaction of the soil underneath the track. The reminder of this

			tree Root Protection Area will be protected with fencing during the use of the track for the cable installation works. Therefore, it is considered that this tree will be adequately protected during the Cable Route Corridor cable installation works. The Applicant had an online TEAMS meeting with NKDC's Tree Officer, Graham Wilson, on the 3rd October 2025 to discuss Fox Covert and trees T76, T1124 and T1125. Mr Wilson was satisfied that as no veteran trees were found on or near the boundaries of Fox Covert that any veteran further into the centre of the woodland would be adequately protected by the BS 5837 RPA set for this woodland. Mr Wilson was also satisfied that T1124 was already recorded as a veteran and that trees T76 and T1125 are not classified as veteran trees.
Appendix 7.1 Legislation	-	This refers to the relevance of the Hedgerow Regulations and indicates that important hedgerows are addressed in Chapter 7. I can identify no mention of important hedgerows in the chapter or the Heritage chapter, and there is no method statement or data within Appendix 7.11 to indicate that a Hedgerow Regulations survey was completed to identify important hedgerows. **Supplementary information should**	Important hedgerows were assessed from a biodiversity perspective and outlined within Appendix 6.6 Arboricultural Impact Assessment (APP-088), as per the Hedgerow Regulations (1997). The methodology and criteria used to identify important hedgerows under the Hedgerow Regulations

		be provided to explain the approach taken and to clarify the relevance of the Hedgerow Regulations.	(1997) will be provided in Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100). This will be updated by Deadline 3.
Appendix 7.2 Planning policy	-	No comments.	The Applicant notes that no comment is provided; thereby no response is required.
Appendix 7.3 PEA	-	This document was provided with the PEI Report. The comments made at that time are still applicable. **The habitat information remains limited as a baseline suitable to support a BNG assessment**.	Limitations of the baseline data are acknowledged and worse-case assumptions have been made for Biodiversity Net Gain (BNG) assessment, as appropriate.
Appendix 7.4 Great crested newt survey	-	This document was provided with the PEI Report. The survey data is now 3 years old. Updated information has been provided as Appendix 7.12. No further comment.	The Applicant notes that, following the provision of updated information, no further comment is provided; thereby no further response is required.
Appendix 7.5 Wintering bird survey	-	This document was provided with the PEI Report. No comments.	The Applicant notes that, following the provision of the document with the PEI Report, no comment is provided; thereby no response is required.
Appendix 7.6 Breeding bird survey	-	This document was provided with the PEI Report. The comments made at that time are still applicable. The approach in relation to Schedule 1 birds is not sufficiently defined, and the survey effort for quail was not sufficient to conclude likely absence or determine the extent of habitat usage.	The mitigation within Section 7.7 of Chapter 7 Ecology (APP-058) ensures that the Rochdale Envelope is considered for species such as quail. Barn owls were the only schedule 1 species recorded breeding within the Site. As outlined in section 6.7.10 of the oCEMP (APP-077) a nesting bird check will be

			undertaken pre-works, this includes for barn owls. This includes an appropriate sized and timed buffer to be decided by the ecologist at the time. As an example referring specifically to the box in the south-east corner by Carr Dyke, as referenced in the nesting bird report (APP-092) this is also used by jackdaw and kestrel simultaneously and it was concluded that the barn owls here may accept a greater amount of disturbance (and therefore require a reduced buffer) than where a box has just been occupied by barn owls. Barn owl impacts are covered by breeding bird impacts within Table 7.7 of Chapter 7 Ecology (APP-058). It should be noted that the provision of vegetated buffers along ditches and other areas of grassland as outlined in the oLEMP (APP-089) will result in a greater food resource for barn owls and result in more successful breeding for birds on and off site.
Appendix 7.7 Bat survey	-	This document was provided with the PEI Report. No comments.	The Applicant notes that, following the provision of the document with the PEI Report, no comment is provided; thereby no response is required.

Appendix 7.8 Badger survey (CONFIDENTIAL)		CONFIDENTIAL The report identifies a number of badger setts within the solar array site including at least four main setts. Buffers have been applied to protect main setts, but there does not seem to be consistent protection of other sett types. Therefore it is not certain setts will not be affected and a badger licence will not be needed. I can identify no comparable baseline data for the Bespoke Access and the Cable Route. This information is not in Appendix 7.20 (Document Ref: 6.3 ES Vol 2 6.3.42), despite a statement to this effect in Chapter 7. **Supplementary information should be provided to provide a full baseline for badger.**	Appendix 7.8 Badger Report (APP-097) will be reviewed to ensure all active setts have appropriate buffers. A baseline badger assessment was undertaken alongside the PEA for these areas and further information will be included Appendix 7.20 Preliminary Ecological Appraisal Report (Cable Route and Access Road) (APP-112) to provide further clarity. A specific badger appendix report for the Bespoke Access Road and the Cable Route has not been provided as the badger results are summarised in Appendix 7.20 Preliminary Ecological Appraisal Report (Cable Route and Access Road) (APP-112).
Appendix 7.9 Riparian mammal survey	-	This document was provided with the PEI Report. No comments.	The Applicant notes that, following the provision of the document with the PEI Report, no comment is provided; thereby no response is required.
Appendix 7.10 Reptile survey		I agree with the survey approach. No reptiles were found. No further comment.	The Applicant notes that no further comment is provided; thereby no response is required.
Appendix 7.11 Botanical survey	Section 2	No suitable methods are described for appraising the status and value of scarce arable flora. Appropriate considerations and methods were identified in the North Kesteven District Council response at PEI	Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) and Appendix 7.15 Botanical Survey Report (Cable Route and Access Road) (APP-104) both include

		Report stage. The relevance of this was first raised in the Council's response to the Scoping Report in 2023. Late July is not an appropriate time to be surveying for arable flora given this period is during or just after the typical period of harvest (as supported by some of the photos within Table 3 of the report) for the cited crops of wheat, oats, field beans and oilseed rape. A post-harvest flush of arable flora (which may not be representative of the assemblage) in fields disturbed by harvest would not reasonably be expected until after early autumn rainfall to stimulate germination. Any conclusions reached in relation to the presence/absence of scarce arable flora are therefore not valid. Late July is also not optimal for appraising grassland and woodland habitats, but there is no reason to expect that any of these habitats will be of county or higher nature conservation value. There remains scope to address comments on arable flora in May and June 2025 so that data can be considered during Examination. **Supplementary information should be provided.**	reference to surveying arable margins, which is the appropriate habitat to survey scarce arable flora. Notable or protected plants are described as being assessed in the methods of both reports. The surveyors used an adapted National Vegetation Classification survey to assess the plant assemblage across the Proposed Development. The botanical surveys focused on arable field margins to sample the diversity of plants including scarce arable flora. Given the high nutrient input and disturbance, the interior of the fields were not specifically targeted for the quadrat sampling. As such timing the survey to avoid harvest was not necessary and followed the National Vegetation Classification methodology.
Appendix 7.11 Botanical survey	Table 2	The habitat identified as 'arable field margins – tussocky' and 'arable field margins – pollen and nectar' would seem to be permanent grassland habitats based on the species lists and photographs provided. In contrast the priority arable field margin habitats apply to temporary habitats sown and managed for biodiversity. Further evidence should be provided to support the habitat classification. Where grassland habitats have been mis-classification then this has implications for agreement of the BNG assessment, which will need to be revised. Supplementary information should be provided.	Botanical survey followed UK Habitats (UK Hab ltd 2023) criteria (see Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100)). Assessment was made based on factors including proximity to arable field and historic management.

Appendix 7.11 Botanical survey	Table 2	The method statement does not explain how the named hedgerows were surveyed and therefore does not demonstrate beyond reasonable doubt that the necessary methods and species lists have been applied to correctly classify the hedgerows. This has implications for agreement of the BNG baseline. A number of hedgerows appear, with reference to the information on Figure 1, to have been incorrectly delimited with reference to standard methods. For example, H9 would appear to border 4 fields so would be 4 hedgerows, H1, H2, H4, H8 are each along two fields and should have been split. Other hedgerows are not clearly labelled and is not clear how these have been delimited. This means has implications for the number of survey sections needed and the data gathered to baseline the hedgerows . For example, two connected 300m hedgerows would each require three survey sections to gather data i.e. six sections in aggregate. If they are treated as one 600m hedgerow then the surveyor would have (if following standard methods) gathered data for just three survey sections. **A supplementary method statement should be provided to clarify the above points.**	Methodology within Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) will be updated to include reference to hedgerow classification.
Appendix 7.11 Botanical survey	Table 3	Woodland 3 – the description and species list indicates this is lowland mixed deciduous woodland, a priority habitat, not 'other woodland'. This woodland is shown on the 1st Edition Ordnance Survey map, indicating a long history that would be inconsistent with the current habitat type assigned. Further, it is mapped as the priority habitat within the MAGIC website, and on the Applicant's Figure 7.4. Mis-classification has implications for agreement of the BNG assessment,	Assessment and classification of woodlands will be revised within Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) where necessary to ensure the correct information feeds into the BNG assessment and 7.3 Biodiversity Net Gain

		which will need to be revised. **Supplementary information should be provided.** Figure 7.4 and MAGIC also identify Woodlands 4 and 5 as priority habitat. Woodland 3 may also include irreplaceable habitats. Confirmation is needed that the mentioned trees with veteran features have been appropriately assessed to determine veteran/ancient status, and whether they are relevant to the Proposed Development. **Supplementary information should be provided. If veteran trees are present this had implications for the management actions given in the Outline LEMP.**	Strategy (APP-280). Specifically Woodland 3, 4 and 5 will be updated to a Priority habitat. Where habitats are mapped as priority habitats, supplementary information will be provided on these habitats including assessment of irreplaceable habitats. This will be submitted by Deadline 3.
Appendix 7.11 Botanical survey	Section 4	There is nothing to indicate specific regard to scarce arable plant species and, as noted above, the survey timing and the indicated target habitats were not appropriate for such species. The narrative strongly implies that the focus of the survey was identification of arable field margin priority habitats. The examples of this habitat given would not be locations where scarce arable flora would reasonably be expected. Appendix 1 indicates a clear focus in sampling towards areas supporting perennial flora rather than cultivated ground supporting annual plant species. Insufficient attention has been given to scarce arable flora and the related advice given by North Kesteven District Council at PEI Report stage in early 2024. **Supplementary information should be provided, see comment above.**	Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) and Appendix 7.15 Botanical Survey Report (Cable Route and Access Road) (APP-104) both include reference to surveying arable margins which is the appropriate habitat to survey scarce arable flora. Notable or protected plants are described as being assessed in the methods of both reports.

Appendix 7.11 Botanical survey	4.1.14	Hedgerows meeting LWS criteria will be of county value, not local value as stated in Table 2.	Table 2 of Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) will be updated to correct conservation value. This will be submitted by Deadline 2.
Appendix 7.11 Botanical survey	4.1.16/17	This aligns with my position in relation to the woodlands identified in Table 3 i.e. three woodlands are priority habitats. However, this is not reflected by the habitat map provided with the report. **It should be confirmed that the correct habitat type has been used in the BNG assessment.** The results of the LWS assessment (which can only be a partial assessment given the timing of the survey could not address ground flora or fungi robustly) identifies that Woodland 3 meets the LWS criteria. It is therefore of county value not local as stated in Table 2.	The habitat map will be updated to show that Woodlands 3, 4 and 5 are Priority habitats and the BNG assessment checked for consistency. 7.3 Biodiversity Net Gain Strategy (APP-280) will be updated accordingly. This will be submitted by Deadline 2.
Appendix 7.12 Great crested newt survey	-	I agree with the survey approach. No further comment.	The Applicant notes that no further comment is provided; thereby no response is required.
Appendix 7.13 Bat roost assessment	-	Further survey is needed to confirm the relative suitability of trees for bats. PRF-I and PRF-M cannot be confirmed for features at height based on ground level appraisal alone. However, if all potentially suitable trees are retained no further action would be required and the Proposed Development would align with good practice (impact avoidance). **However, clarification is needed of any implications arising from the tree removal identified in the Arboricultural Impact Assessment.**	Where removal of trees is outlined within Appendix 6.6 Arboricultural Impact Assessment (APP-088), the outlined trees have been cross referenced with Appendix 7.13 Bat Roost Assessment Report (Solar Array Area) (APP-102) and Appendix 7.16 Bat Roost Assessment Report (Cable Route And Access Road) (APP-105) to ensure that trees with bat roost potential are to be retained post development. As no trees with bat roost

			potential have been outlined for removal, no further survey action is required.
Appendix 7.14 Invertebrate survey	-	No comments.	The Applicant notes that no comment is provided; thereby no response is required.

Appendices – Cable Route and Access Road

Report	Section of Report	Comment	Applicant Response
Appendix 7.15 Botanical survey	-	The survey was optimally time for early to mid-June. The survey is subject to the same limitations and the same requirements for clarifications as Appendix 7.11. Scarce arable flora is not a relevant consideration where land take is temporary and arable fields will be reinstated back to their baseline state. **Supplementary information should be provided in relation to permanent habitat losses.**	Appendix 7.11 Botanical Survey Report (Solar Array Area) (APP-100) and Appendix 7.15 Botanical Survey Report (Cable Route And Access Road) (APP-104) both include reference to surveying arable margins, which is the appropriate habitat to survey scarce arable flora. Notable or protected plants are described as being assessed in the methods of both reports.
Appendix 7.16 Bat roost assessment	-	All potentially suitable trees are stated to be retained, so no further action would be required and the Proposed Development would align with good practice (impact avoidance). **However, clarification is needed of any implications arising from the tree removal identified in the Arboricultural Impact Assessment.**	Where removal of trees is outlined within Appendix 6.6 Arboricultural Impact Assessment (APP-088), the outlined trees have been cross referenced with Appendix 7.13 Bat Roost Assessment Report (Solar Array Area) (APP-102) and Appendix 7.16 Bat Roost Assessment Report (Cable route and access road) (APP-105) to ensure that trees with bat roost potential have not been

			outlined for removal. As no trees with bat roost potential have been outlined for removal, no further survey action is required.
Appendix 7.17 Wintering bird survey		I agree with the survey approach. No further comment.	The Applicant notes that no further comment is provided; thereby no response is required.
Appendix 7.18 Bat activity survey	-	I agree with the survey approach. No further comment.	The Applicant notes that no further comment is provided; thereby no response is required.
Appendix 7.19 Riparian mammal survey	-	I agree with the survey approach. The presence of otter and water vole was confirmed, with the latter occurring widely. No further comment.	The Applicantnotes that no further comment is provided; thereby no response is required.
Appendix 7.20 PEA	Page 33	Grassland at Bicker Substation with Galium verum and Primula veris is not consistent with poor semi-improved grassland. The data was gathered in March which is not an appropriate time of year for grassland survey. This grassland requires re-survey at an appropriate time of year to verify the grassland type given the potential for impact from the development. **Supplementary information should be provided.**	The grassland within the substation were of low diversity and until recently (ca 2005) arable fields and managed by regular cuts until at least 2020. Where the grassland will be impacted regardless of habitat type, the habitat will be reinstated within the Proposed Development for the operational phase as outlined within 7.3 Biodiversity Net Gain Strategy (APP-280).
Appendix 7.21 Great crested newt survey	-	I agree with the survey approach. I agree the un-surveyed ponds are low risk given their positions and the types of works proposed. No further comment.	It is noted that no further comment is provided; thereby no response is required.

Appendix 7.22 Breeding bird survey	-	Only four of the six survey visits was within the survey period for quail (mid- May to end of July), a Schedule 1 and Endangered bird species. So, the survey effort was less than appropriate to conclude the absence of this species or the extent of habitat usage. Consistent with the preceding solar projects in the District, quail is **a relevant consideration that needs further attention**. Precautionary working methods can be agreed in relation to the cable route given this involves temporary land take.	The mitigation within Section 7.7 of this Chapter considers describes how potential effects on quail are mitigated.
Figure 6.31 Landscape Strategy Plan	Part B	This seems to be a series of bird survey Figures, is this correct? If not, **the correct Figures should be provided.**	Figures to be checked and correct figures provided if necessary.

Biodiversity Net Gain and Outline Landscape and Ecological Management Plan (Outline LEMP)

Report	**Section of Report**	**Comment**	**Applicant Response**
Biodiversity Net Gain Strategy (Document Ref. 7.3)	General	The metric has not been provided for review and this prevents agreement of the Strategy. **Supplementary information should be provided. The metric and report also require further review by the Applicant in relation to the observations made below.**	Once finalised, the metric will be provided directly for review as an appendix of 7.3 Biodiversity Net Gain Strategy (APP-280). This will be submitted by Deadline 2.
Biodiversity Net Gain Strategy (Document Ref. 7.3)	1.3.14	Reference has not been made to the Central Lincolnshire BNG Guidance. **Confirmation is needed that the Strategy aligns with this**, including the guidance for assigning Strategic Significance, and determining the programme for monitoring. Monitoring should align with the Outline LEMP.	Confirmation will be provided within Section 1.3.14, 7.3 Biodiversity Net Gain Strategy (APP-280) that the relevant guidance on strategic significance and monitoring was checked and fed into the metric. This will be submitted by Deadline 2.

Biodiversity Net Gain Strategy (Document Ref. 7.3)	General	The baseline information provided with the report does not account for all habitats, certain habitats have been mistranslated, and the habitat mapping does not appear sufficiently accurate. Specifically: - The priority woodland habitat identified in Appendix 7.11 is not included. - Examination of aerial imagery shows more grassland within the solar array, on field boundaries and in association with ditches, than appearsto have been mapped. - The previously (see above) queried distinction between grassland and arable habitats has relevance to the BNG assessment. I note that some of the arable habitats have been treated as grassland in the Strategy. The inconsistencies between reports needs to be addressed – there can be only one habitat baseline for assessment purposes. - I do not agree with the translation of marshy grassland as cropland. This should be reviewed against the relevant habitat definitions and further explanation provided. - The tall ruderal habitat has been mis-translated for BNG purposes. However, I believe the metric weightings are comparable. - Rural trees are not accounted for. The Arboricultural Impact Assessment identifies at least one hedgerow tree (T81) and two tree groups (G11, G56) that are of sufficient size to need accounting for. The vegetation removal plans indicate that there	The Biodiversity Net Gain metric shows that arable crops provide around 1300 of approximately 1950 units at the baseline, with grassland 500 units and woodland around 110. As small areas of priority habitats have been amended on Magic maps around the time of submission the Applicant will review 7.3 Biodiversity Net Gain Strategy (APP-280). This will be submitted by Deadline 3. The woodland habitat will be amended within the Biodiversity Net Gain metric and 7.3 Biodiversity Net Gain Strategy to reflect its priority status. Where field boundaries meet the minimum mapping unit they will be adjusted within the metric to grassland. The translation of marshy grassland will be updated to match the assessment of the botanical survey which found it be other neutral grassland. Trees as outlined within Appendix 6.6 Arboriculture Impact Assessment (APP-088) will be included within the Biodiversity Net Gain metric and 7.3 Biodiversity Net Gain Strategy.

		are other trees that may need to be removed and that should be accounted for on a precautionary basis (in accordance with the Rochdale Envelope approach). These are T001 and T019, although others may also have relevance. - Habitats mentioned in Chapter 7 are not covered (or are mistranslated). Specifically, coastal and floodplain grazing marsh. - The length of species-rich hedgerow within the solar array site (30m) given in Table 5 seems way below the extent mapped on the Figure provided in Appendix 7.11. **Supplementary information should be provided.**	
Biodiversity Net Gain Strategy (Document Ref. 7.3)	Table 5	The accounting of habitat losses does not appear correct: - There are hedgerow losses identified on the vegetation removal plans that have not been recorded. Where the design is subject to change worst case precautionary assumptions should be made in accordance with the Rochdale Envelope approach so that the impacts of the development are adequately assessed. This can be revised later if this changes at detailed design. - The woodland losses on the bespoke access and cable route corridors recorded in the Arboricultural Impact Assessment do not appear to have not been accounted for. **Supplementary information should be provided.**	The Biodiversity Net Gain metric will be reviewed, and 7.3 Biodiversity Net Gain Strategy (APP-280) will be updated if required.. This will be submitted by Deadline 2. Where there are woodland losses, these have been accounted for within the Biodiversity Net Gain metric.
Biodiversity Net Gain Strategy (Document Ref. 7.3)	General	The post-development proposals provided within the report do not account for all habitats, certain habitats have been mistranslated, and the habitat mapping does not appear sufficiently accurate:	The Biodiversity Net Gain metric will be reviewed, and 7.3 Biodiversity Net Gain Strategy (APP-280) will be updated

		- The proposed habitat plan does not account for all land within the Order Limits. For example, the bespoke access road is not accounted for. - The plan is hard to interpret as it covers the entire site (potentially there are some sheets missing from the document given the plan is not consistent with the baseline plans). Confirmation is required that the calculation of habitat areas e.g. grassland is correct and not over-estimated. The Landscape Strategy Plans (Figure 6.31) appears to show grassland drawn over tracks e.g. the track to Gashes Barn. - It is not clear from the Landscape Strategy Plans (Figure 6.31) if habitat is proposed to be created in the On-site Substation compound and if this is realistic. The colouring of this area is green which could indicate grassland. - Further explanation is needed for the proposed creation of floodplain grazing marsh. There is no record of this habitat at the proposed location north of Gashes Barn within MAGIC so habitat restoration is not possible. Further explanation is needed for how the habitat definition is met, including the hydrological requirements, and how it can function as floodplain grazing marsh for relevant species (which is integral to the definition) given the presence of solar panels. - Use of lowland meadows as a proxy for floodplain grazing marsh (Table 2) needs to be explained, particularly given the emphasis placed on restoration of the latter habitat elsewhere e.g. within Chapter 7 (paragraph 7.6.68). If the latter habitat is proposed then it needs to be demonstrated that the definition	accordingly. This will be submitted by Deadline 2. Regarding the Landscape Strategy Plans (Figure 6.31) - The Biodiversity Net Gain mapping and associated calculations includes reference to tracks and is therefore considered reliable. Additionally, the habitat within the On-site Substation is mapped for BNG purposes as retained hard standing so has been accounted for from a biodiversity perspective. Regarding the proposed creation of floodplain grazing marsh – This is the long-term target habitat based on the hydrological conditions of the area and targets of Natural England's National Character Areas, in order to make biodiversity enhancements. However, within the Biodiversity Net Gain metric it will be altered to other neutral grassland based on updated criteria for achieving this habitat type. The distinctiveness of the other neutral grassland can be raised over time but for the purposes of the metric the initial proposed habitat will be updated to other neutral grassland.

		for this habitat can be met, as queried above. - It needs to be clarified how the proposed wildflower meadows align with the definition of lowland meadow and that it is reasonably certain (given the definition and practicalities) that this habitat can be delivered. The seed mixture referred to on the Landscape Strategy Plan (EM2) does not meet the species requirements. - There does not appear to be compensation for impacts on woodland and trees. - New culverts over ditches do no not appear to have been accounted for within the watercourse element. **Supplementary information should be provided.**	
Biodiversity Net Gain Strategy (Document Ref. 7.3)	2.5.6	The approach detailed is not correct where there are losses of hedgerow trees. **All tree loss should be accounted for in the BNG assessment**.	Tree losses outlined within Appendix 6.6 Arboriculture Impact Assessment (APP-088) will be included within the Biodiversity Net Gain metric and 7.3 Biodiversity Net Gain Strategy. This will be submitted by Deadline 2.
Biodiversity Net Gain Strategy (Document Ref. 7.3)	General	Insufficient information has been provided to demonstrate that the assumed post-development habitats and condition weightings are reasonably certain and securable e.g. good condition Lowland Meadow, how hedgerows are to be enhanced to species-rich status, and ditch enhancement. **Supplementary information should be provided.**	The Biodiversity Net Gain metric will be reviewed, and 7.3 Biodiversity Net Gain Strategy (APP-280) will be updated accordingly. Further information included such as details of additional planting to demonstrate that post-development

		Enhancement of ditches could arise from conversion of arable farmland to grassland but, before agreeing this, confidence is needed that all pre-existing grass headlands have been accounted for (see comment above) as these could influence this assessment. **Supplementary information should be provided.**	habitats and enhancement are achievable. This will be submitted by Deadline 2.
Outline LEMP	General	The Outline LEMP needs to be considered within the framework of inter-related documents and there are comparable issues to those raised in relation to Chapter 7 and the BNG Strategy. There are omissions of commitments made elsewhere (e.g. pond enhancement/reinstatement within Chapter 7 – if this is viable (see related comments)). It does not achieve the purpose set out in 2.3.3 to "demonstrate that the broad landscape and ecological mitigation measures … are achievable." **More detail is required to support the statements and commitments made elsewhere in the Application.**	Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089) to be updated by Deadline 2 to be consistent with any updates throughout Chapter 7 Ecology (APP-058) and 7.3 Biodiversity Net Gain Strategy (APP-280).
Outline LEMP	2.2.3	Woodland stand-offs are not consistent with the 15m stand-offs set elsewhere. **Minor amendment is required.** There are no clear proposals within the application for floodplain grazing marsh creation that demonstrate this is deliverable and conforms with standard habitat definitions. **Supplementary information should be provided.**	Buffer stand offs updated in Section 2.2.3 of Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089).
Outline LEMP	2.4.9-2.4.10	The clear Rochdale Envelope parameters set here are welcome. It is not clear elsewhere in the application that this is what has been assessed and mitigated.	The Rochdale Envelope parameters have been considered throughout. Where specific species have been outlined in comments above, these will be specifically addressed where necessary.

Outline LEMP	2.5.5	Why is the target for native hedgerow creation not 100% native? **Minor amendment is required.**	Section 2.5.5 of Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089) will include minor update to reiterate that native hedgerows will be created. This will be submitted by Deadline 2.
Outline LEMP	2.5.10	Further review and explanation is needed to demonstrate the ability to provide long term management of hedgerows (and any other habitat) on land within the Site that is outside the Applicant's long term control e.g. within the Cable Route. Where management and monitoring is not certain to be possible long-term this will need to be factored into the BNG assessment. **Supplementary information should be provided.**	As outlined within 7.3 Biodiversity Net Gain Strategy (APP-280) habitats will be reinstated following development and have been treated as temporary habitat loss in-line with Biodiversity Net Gain guidance with no change in units. This is consistent with equivalent DCO applications in the area.
Outline LEMP	Table 1.2	I estimate a combined cover of trees species in the order of 50% based on the proportions given. This is not consistent with the definition for scrub habitat. **The habitat type should be reviewed.**	The habitat outlined within this table includes tree species alongside scrub species to encourage a structured habitat to establish in the long-term.
Outline LEMP	2.5.3 onwards	This refers to and provides management prescriptions for woodland, despite this section being indicated as covering scrub habitat. No woodland is allowed for in the BNG Strategy. **The habitat type should be reviewed.**	The habitat type will be reviewed and clarity provided within Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089). 7.3 Biodiversity Net Gain Strategy (APP-280) will reflect any habitat updates if required. This will be reviewed by Deadline 2.
Outline LEMP	2.5.10	The seed mixture proposed, a grass only EG1 mixture, is not consistent with the definition for neutral grassland. Therefore the Outline LEMP	At this stage, the specific seed mixture is outline only. Further detail on plant species

		does not match the commitment made on the BNG Strategy or the details provided on the Landscape Plan. **The habitat type should be reviewed.**	will be provided once a local supplier has been sourced at the detailed design stage as secured by Section 2.5 of the oLEMP (APP-089). The seed mixtures will be reviewed by the ecologists to ensure that habitats outlined within 7.3 Biodiversity Net Gain Strategy (APP-280) are achieved.
Outline LEMP	2.5.12	Noting the above, the reference to conservation grazing seems erroneous in a grassland type of minimal biodiversity value.	At this stage, the specific seed mixture (and, therefore, the best suited management) is outline only. Further detail to be provided once local supplier has been sourced as secured by Section 2.5 of the oLEMP (APP-089).
Outline LEMP	2.5.14	The management here is not consistent with grassland completely lacking in a wildflower component.	At this stage, the specific seed mixture (and, therefore, the best suited management) is outline only. Further detail to be provided once local supplier has been sourced as secured by Section 2.5 of the oLEMP (APP-089)..
Outline LEMP	2.5.17	**Evidence needs to be provided** to demonstrate that the area for floodplain grazing marsh is prone to flooding and therefore suitable. This is not obviously supported by the assessment in Appendix 11.1 Flood Risk Assessment. See comments elsewhere on this proposed habitat.	Chapter 11 Water Resources and Flood Risk (APP-062) verifies the area is prone to flooding and, therefore, suitable for the proposed habitat. Within Appendix 11.1 (AP-0P-162) the plan ST19595-442 Flood Map for Planning (Solar Array Area) (see page 213)

			shows the proposed land for floodplain grazing marsh is in Flood Zone 3 with an annual probability of flooding of over 1 in 100. Bespoke fluvial flood modelling also shows that the area has a greater than 1 in 100 annual probability of flooding. The modelling is subject to approval from the Environment Agency at the time of writing. Based on the information presently available, it is considered this area has a high likelihood of flood. Furthermore. the development will retain the existing baseline flood risk and widespread ground level raising is not proposed in this area of the Solar Array Area and any losses of floodplain storage will be compensated for. It is considered, therefore, that this land will continue to regularly flood when the development is operational. This is secured pursuant to Requirements 5 of the Draft DCO.
Outline LEMP	2.5.19	It is not acceptable to provide a lengthy list of plant species and state that species will be chosen from this list. What species and how many are needed to achieve conformity with the target habitat? I would question whether seed is available for a substantial proportion of	At this stage, the specific quantity and species of plants required has not been provided. Further detail to be provided once local supplier has been sourced as secured by Section 2.5 of the oLEMP (APP-089).

		these species, even if it can be evidenced that the site is suitable for them. **An unambiguous specification should be provided.**	
Outline LEMP	2.6	This is stated to be section on habitat enhancement. Much of the content relates to habitat protection and retention not enhancement. Proposals for enhancement must be clearly linked to addressing issues with the baseline status, the evidence for this (e.g. in relation to hedgerows) is weak at present. **This section should be reviewed and supplementary information provided.**	The section is intended to cover enhancement of the retained habitats. For the hedgerows enhancement has included improvements to the ground flora (Section 2.6.5), management to allow the existing hedgerows to grow greater structure and, timing cuts to retain berries and seeds longer. Habitat retention with appropriate management will enhance the Site.
Outline LEMP	2.6.19 onwards	There is little here that is clearly additional and therefore agreeable as substantive enhancement. Low intervention management of woodland is not obviously enhancement and, in all likelihood, reflects the status quo. Pruning trees, retention of existing deadwood, and felling of senescent and diseased trees is not obviously management for landscape and biodiversity. The latter would seem to be a valuable biodiversity resource (and is encouraged elsewhere in the Outline LEMP e.g. creation of veteran features). Why would they need felling on a site with no public access? If felling is necessary for the development (e.g. to protect solar panels) then this tree loss should be accounted for in the BNG assessment. Confidence is also needed that this does not apply to veteran trees. **Supplementary information should be provided.**	The management of trees (outlined in Section 2.6.19 of the oLEMP, APP-089) does refer to felling of senescent or diseased trees but Section 2.6.20 details that diseased trees would only be removed *where there is a clear risk of disease or pest transmission. This will only be undertaken following consultation with, and under the direction of, the Forestry Commission and the Animal and Plant Health Agency, where appropriate.* Where this is not the case the Applicant agrees that trees should be left in situ and retained as features suitable for biodiversity as detailed in the second point of Section 2.6.20 of the oLEMP (APP-089).

			As discussed in the meeting between the Applicant and NKDC (14th August 2025), the applicant is happy to provide further high level information on the enhancement including reducing the nutrient enrichment noted in the botanical survey of the woodland (Appendix 7.11 Botanical Survey Report Solar Array Area APP-100). This will be provided at Deadline 3.
Outline LEMP	2.6.21	Please confirm that the proposed management of ditches does not conflict with the requirements of the Internal Drainage Board.	Requirements of the Internal Drainage Board will be reviewed to confirm there is no conflict with ditch management proposed. This will be stated within Section 2.6.21 of Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089).
Outline LEMP	2.6.22 onwards	This section is stated to be protected species enhancement. Very little is actually enhancement, the majority of the content is maintenance of existing habitats and protection measures. **This section should be reviewed and supplementary information provided.**	The appropriate management of habitats will enhance the Site for protected species.
Outline LEMP	2.6.30	Contrary to the statement in Chapter 7, no provisions are made for ground nesting birds such as skylark. **Supplementary information should be provided.**	Section 2.5 of Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089) includes management of the post development habitats to best provide a food source for all birds including ground nesting birds. The mitigation within Section 7.7 of Chapter 7 Ecology (APP-058) and Section

			2.6.30 of Appendix 6.7 Outline Landscape and Ecological Management Plan (APP-089) will be reviewed to ensure the mitigation covers ground nesting birds and the amendments made at Deadline 3.